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From: Jody Endres [mailto:jendres2@igb.uiuc.edu]
Sent: Thursday, June 17, 2010 12:14 PM
To: LCFS Expert Workgroup@ARB
Subject: question

I missed a little of the hearing. . . but, did anyone discuss whether and how these models treat potential restraint on land conversion in Brazil due to implementation of the Agro-ecological zoning plan (Agro-ecologico Zonemento)?

Thanks,
Jody Endres

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From: Jody Endres [mailto:jendres2@igb.uiuc.edu]
Sent: Thursday, June 17, 2010 12:30 PM
To: LCFS Expert Workgroup@ARB
Subject: FW: question

Follow up question to Bruce's answer:

I saw that the AEZ's are in the slide presentation, but are those AEZ's based on the new Brazilian *federal law* that says no development of sugar cane for ethanol, for example, in the Patanal or the Amazon?

It's not clear from the slide that the "AEZ's," as you call them, are consistent with the Brazilian Zoneamento Agro-Ecologico *law*.

If the legal constraint on expansion for sugar cane ethanol is not included in the model, shouldn't it be?

Thank you,
Jody Endres, University of Illinois Energy Biosciences Institute

From: kshepherd@growthenergy.org [mailto:kshepherd@growthenergy.org]
Sent: Thursday, June 17, 2010 1:19 PM
To: LCFS Expert Workgroup@ARB
Subject: Comments

Today's grain ethanol fuel is a finely-developed, low-carbon alternative to oil. The Yale Journal of Industrial Ecology published a peer-review study that found that grain ethanol is 59 percent cleaner than conventional gasoline. With a 59 percent reduction in GHGs, there is no question that grain ethanol is a low-carbon fuel.

The production of grain ethanol is getting cleaner and more efficient. The ethanol makers are the ones who are driving that development of new bio-refinery technology -- whether it is the recycling of energy in ethanol plants, or reducing water use in plants.

Growth Energy's position is in support of a low carbon fuel standard -- if it is done right. We believe that applying controversial indirect land use change penalties against grain ethanol, and not fossil fuels, puts our only commercially-viable alternative to oil at an unfair advantage.

New modeling from Purdue University's Wally Tyner raises the question of whether CARB should revisit ILUC penalties on grain ethanol -- something we would urge CARB to do.

From: Paul Wikoff [mailto:prwikoff@yahoo.com]
Sent: Thursday, June 17, 2010 2:10 PM
To: LCFS Expert Workgroup@ARB
Subject: LCFS Indirect Effects - Petroleum

Good day,

Since the last EWG meeting I notice that the indirect effects of petroleum and other fuels are now being assessed; thank you kindly. I am viewing the pdf document titled Sub-group 6: Indirect Effects of Other Fuels, which contains 6 slides. It does include on slide 4 topics such as "deforestation, water use, and oil spills." These are excellent items to include, and I am wondering if these in particular will focus on assigning an LCFS value to petroleum that relates to tar sands, oil shale, and an average annual world wide oil spill value. Each unit of alternative fuel used instead of petroleum will offset a unit of tar sand and oil shale petroleum, as well as deep water drilling that obviously now can lead to a massive oil spill, so I do believe with conviction that the LCFS value of petroleum should be that of deep water drilling, tar sand and oil shale petroleum; not that of average in-state California petroleum produced today--that is, one can pull up to a Californian Arco/BP gasoline pump today and 6/24/2010fill up with gasoline, or

soon buy products made with petro chemicals, that are available due to deep water drilling. If the logic is to include the worst case scenario for biofuels including the controversial indirect land use change aspect, it only makes logical sense to include the worst case (though very real) scenario for petroleum, which is deep water drilling, tar sands and oil shale. I propose that the oil spill value include all the additional indirect effects including the ships, airplanes, vehicles, chemicals, increased use of media including newspapers and magazines (paper and chemicals), television and internet (electrical use), and decomposition of wildlife (which releases carbon and methane) that are related. You may consider subtracting out the savings of carbon due to canceled oil executives' summer vacation plans--though please do include their PR-related travels from Europe to North America.

As well the military protection of foreign oil fields, shipping channels, and oil tankers absolutely must be considered for their indirect effects as well. This is a massive effect that would be considerably decreased should most nations produce their needs for alternative fuels domestically. The indirect effects of oil industry lobbyists as well is a justified variable to include.

There is no doubt that the indirect effects caused by the negative health impacts of petroleum use need to be included in the indirect effect value. Personally, a family member of mine became mortally ill from a disease that is most often connected to exposure to benzene, a chemical most often found in gasoline, plastics, and other petroleum products. This resulted in significant indirect effects not only for many members of my family, some still continuing years later as miracously she survived the grueling treatments, but also for countless other families impacted by various negative health impacts caused by petroleum products in the

United States alone, not to mention world wide. The indirect effect value for the negative health impact of petroleum is very likely immense, and it would be a disservice to these affected families to not include an accurate value for this, especially at a time when the health effects due to the BP-Gulf of Mexico oil spill are now being discussed of major concern.

As you know, the control item considered in science must first be accurately measured; only then can the other variables be assessed for comparison. Petroleum, for now, is the control. Again, much praise to you for tackling this very important indirect effect subject and its wide-reaching aspects.

Thank you,
Paul Wikoff