



Western States Petroleum Association  
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**Thomas A. Umenhofer, CCM, REPA**  
Vice President

April 14, 2017

Mr. Sam Wade  
Branch Chief  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

sent via email: [LCFSworkshop@arb.ca.gov](mailto:LCFSworkshop@arb.ca.gov)

Re: WSPA Comments on ARB March 17, 2017 Alternative Jet Fuel Working Session

Dear Sam,

The Western States Petroleum Association (WSPA) appreciates this opportunity to provide initial feedback on the California Air Resources Board (ARB) staff presentation at the Alternative Jet Fuel Working Session, held on March 17, 2017 in Sacramento, CA. WSPA is providing these comments as part of a continuous effort to provide feedback on the LCFS-related items presented by ARB. WSPA is a non-profit trade association representing companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California and four other western states.

- WSPA is not opposed to the inclusion of credit generation from renewable jet fuel. However, we would be opposed to any obligation being placed on petroleum-based jet fuel. WSPA requests that ARB verify the ARB staff assertion during the Working Session that ARB cannot impose an obligation based on their inability to impose regulations on jet fuel due to preemption by federal law/regulation or some other reason.
- WSPA requests that ARB provide estimates of how many credits are anticipated to come from renewable jet fuel in 2019 and 2020, along with an estimate of how many credits would be available today if the regulations enabled such credits.
- WSPA believes that, in any case, safety and quality should remain a priority for bio-jet fuel blends.
- Will ARB perform an emission analysis for substitution of renewable jet fuel for petroleum jet fuel for the Environmental Impact Report (EIR)?
- In the NREL presentation, Slide 14, it appears that the third D4 RIN should read \$1.58 instead of \$1.70.

WSPA appreciates this opportunity to provide our initial input regarding the Alternative Jet Fuel Working Session. If you have any questions, please contact me at (805) 701-9142 or via e-mail at [tom@wspa.org](mailto:tom@wspa.org).

Sincerely,

Cc: Cathy Reheis-Boyd, WSPA