

From: Lisa McGhee [<mailto:lisamcghee@aol.com>]

Sent: Monday, July 11, 2016 4:39 PM

To: Aguila, Jim@ARB; Lawver, Renee@ARB; King, Sara@ARB

Cc: tbrotherton@calstart.org; JBoesel@calstart.org

Subject: arbcombo -- LCFS Public Workshop to Discuss Potential Regulation Revisions including Addition of Third-Party Verification

Dear ARB and CalStart:

I appreciate that ARB and CalStart are working toward a more accurate LCFS reporting for all fuels. I have 2 comments of concern to report and a request for revisions on the credit reporting for the following:

1) We are an early adopter of Medium Duty 10,000 GVW ZEV buses; however, my concern is that we are reducing GHG at a higher rate than light duty EV vehicles; but the LCFS credit reporting does not have a category the is suitable for a multiplier for our GV weight. Large buses are in the heavy duty LCFS reporting category; but you have categorized my Medium duty bus the same as a light duty passenger car yet my bus is 2.5 times heavier. What are going to do about the credit for the Medium Duty category to make it more accurate? Will this be on the agenda? I will look forward to a response.

2) The remaining of our fleet is diesel Sprinter passenger shuttles and we have been using either Bio Diesel Fuel or Renewable Diesel Fuel since 2010 in our Diesel buses. I would like to know why or have you considered what you will make available as an incentive for the fleets. If the goal is to be met to adopt LCF then why not provide an incentive for the diesel fleets who also choose to refuel with a Low Carbon Fuel. It only makes sense and brings us that much closer to enticing others to make the cleaner fuel choice. A low carbon credit should be applied and available to fleets who refuel with Bio Diesel fuel or Renewable Diesel fuel. Is this on the agenda or is it being considered?

I will look forward to your response. Thank you in advance for your time. ~Lisa McGhee

Lisa McGhee, operations manager
San Diego Airport Parking Company
2771 Kurtz St., San Diego, CA. 92110
www.sdap.net
714-881-4856, direct
619-574-1177, work

The California Air Resources Board (ARB) staff invites you to participate in a Low Carbon Fuel Standard public workshop to discuss potential regulation revisions to improve data quality and reporting methods in the Program, including the addition of third-party verification provisions.

The LCFS, a regulation to reduce the carbon intensity of fuels sold in California ten percent by 2020, is one of the measures adopted by ARB, pursuant to Health and Safety Code Sections 38500-38599 (AB 32) to reduce California's greenhouse gas emissions. It is designed to help clean the air, protect the environment, and drive the development of clean, low-carbon fuels.