



November 21, 2016

Sam Wade  
Jim Aguila  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Via Electronic Submittal

RE: Comments on October 24, 2016 ARB staff presentation—Timing and Proposed Broader Amendments to LCFS.

Dear Sam and Jim,

We would like to thank you and your staff for previewing the expanded scope and timeline of the proposed amendments to the Low Carbon Fuel Standard Regulations (LCFS or Regulation). Extending the information gathering process, rather than rushing into formal rulemaking allows Renewable Products Marketing Group (RPMG) and other stakeholders the opportunity to digest and thoughtfully comment on the sweeping staff proposal to expand the scope and complexity of the LCFS. RPMG appreciates the acknowledgement of work still to be done that is inherent with the additional time being allotted. We particularly appreciate and support the planned individual fuel workshop discussions.

Based on our extensive experience with biofuel markets and credit quality assurance programs outside of the LCFS, RPMG offers the following high-level comments.

- ARB's MVS program must be practical, cost-effective, fairly implemented and provide the means to mitigate risk exposure.
- The staff approach of conducting fuel-specific workshops is a positive continuation in understanding the differences between fuel types and their associated risk thresholds.
- Conflict of Interest and forced transitions between Verification Bodies remain points of concern.
- ARB and all impacted stakeholders need to have a full and complete understanding of the potential costs of this broad proposal prior to moving forward to the formal adoption stage.

RPMG is reviewing the MVS whitepaper and will reach out to ARB to discuss the various positions related to harmonization with other existing programs.

RPMG is committed to working closely with ARB and will continue to participate in the monitoring and verification system (MVS) process outlined. If you have questions, please contact me at (952) 465-3247 or [jwhoffmann@rpmgllc.com](mailto:jwhoffmann@rpmgllc.com).

Sincerely,

A handwritten signature in blue ink, appearing to read 'J Hoffmann'.

Jessica Hoffmann  
Regulatory and Compliance Manager  
RPMG, Inc.