

## **Comment 1 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Defense Council  
Last Name: Natural Resources  
Email Address: oakdale75@yahoo.com  
Affiliation: Members

Subject: Form Letter #1  
Comment:

Nov 8, 2011

California Air Resources Board members  
1001 I Street  
Sacramento, CA 95814

Dear Air Resources Board members,

I urge you to uphold and protect California's low carbon fuel standard, which is reducing our state's oil dependency, lowering the global warming pollution caused by oil, and ensuring that oil companies are investing in cleaner alternatives.

Nearly a year ago, California voters rejected attempts by oil companies to undermine our state's clean energy law by soundly defeating Proposition 23. Now oil companies are attempting to weaken the low carbon fuel standard, a core part of the law, by weakening requirements and exempting dirty, high-carbon fuels. The board should reject these attempts.

Oil companies have the ability to invest in cleaner solutions, and the standard ensures they do so. By reaffirming your strong support for the standard, you will send a strong signal that California is serious about moving from being one of the biggest importers of oil to a leading exporter of clean energy. California can lead the world in investing in cleaner and safer sources of fuels. Hundreds of companies today are involved in helping fuel our cars and trucks from alternatives such as electricity, hydrogen, advanced biofuels and natural gas.

The board should also vote to ensure that oil companies are not only phasing in cleaner fuels, but phasing out the dirtier ones. I urge you to direct Air Resources Board staff to strengthen their proposal by

ensuring that each oil refinery properly accounts for its use of dirtier oil sources -- like tar sands -- that only take us backwards.

California must move forward and help grow the clean fuels industry with this standard. Again, please vote to strengthen California's leadership in clean fuels and to reject attempts by oil companies to undermine our low carbon fuel standard.

Sincerely,

Ms. Laura Lynch  
167 Hancock St  
Meriden, CT 06451-3805

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-11-08 14:14:05

771 Duplicates.

**Comment 2 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Jason

Last Name: Wolf

Email Address: Non-web submitted comment

Affiliation:

Subject: ECOtality, Inc.

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/3-lcfs.pdf](http://www.arb.ca.gov/lists/lcfs2011/3-lcfs.pdf)

Original File Name: LCFS.pdf

Date and Time Comment Was Submitted: 2011-11-10 14:48:30

No Duplicates.

## **Comment 3 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Jeanne  
Last Name: Keith-Ferris  
Email Address: jkferris@shaw.ca  
Affiliation: retired RN

Subject: California clean air and dirty oils (tar sands)  
Comment:

I am a native born California as were my parents. My grandparents moved to California in the early 1900's. They were contributing citizens who helped build the marvellous state of California.

Though I no longer live in California, I have relatives still in the state and visit frequently; therefore, I follow California politics and activities.

I am very proud of California's government leadership and visionary position taken with regards to clean air and improved car fuel efficiency/reduction of GHG emissions.

For the last 20 years I have lived in Calgary, and now on Vancouver Is. were resource extraction occurs in our backyard...it is enormously distressing.

California needs to strengthen its light truck, car GHG emissions and clean air policies. Why? Because countries like Canada have very weak governments who swoon to big oil, gas and coal interests.

The only way to save our environment and the native americans who are dying (due to tar sands extraction) is to cut back on the demand side for our resources. That is the role California plays. California with strong legislative rules for GHG mitigation, by its action, will show the way for other gas consuming governments how they too can legislate positive polices to bring about a transition to alternative energy.

Please help us up here in Canada to save our environment.

Don't forget, the tar sands extraction in Northern Alberta is the largest open pit mind on the plant, with little government oversight and devastating consequences to our environment and slow death to the small populations of Native Americans living downstream from the tar sands extraction.

Thank you

Jeanne Keith-Ferris  
Vancouver, Island

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-11-17 06:57:56

No Duplicates.

## **Comment 4 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Sierra

Last Name: Scott

Email Address: indovol2005@yahoo.com

Affiliation:

Subject: Support of LCFS regulation

Comment:

Our dependence on hydrocarbon fuels is unsustainable for many reasons:

- 1) Burning them causes atmospheric carbon to increase which results in climate change, which will result in shifting concentrations of drought, more intense Atlantic hurricanes, threats to existing food supply chains, unknowable damage to biodiversity and more.
- 2) Known reserves of fossil fuels, while still vast, are getting harder and more expensive to extract. Spending money on coming up with new ways to extract these hydrocarbons is a bad decision not only for our planet but also for our wallets. Money is much better spent on developing technology to improve the harnessing of renewable energy.
- 3) If dependence remains high, the location of new fossil fuel reserves can cause contentious relations among nations and can even lead to (more) wars.
- 4) The location of known reserves such as Alaska are home to precious wildlife and nature preserves and drilling will damage these pristine habitats.
- 5) The rise of developing nations such as China, India and Brazil is happening largely with coal and through vast deforestation. This will accelerate the already expected global warming trajectory and soon we will find that we have spent too much time trying to win support for further extraction of fossil fuels and not enough on a backup plan.

For these reasons and more it is vital that California be brave in leading the way toward a more sustainable future. Do not back down to Big Oil, instead you should get each oil company to commit to developing renewable energy laboratories. At the very least you should impose an abatement program for the emissions they are responsible for in the state. The answer is in front of us. Let this not be another example of how being presented with the solution too early can lead to inaction. We have learned our lesson and it is time to act now. This can be done and CA will set the tone for the rest of the nation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-11-28 16:31:00

No Duplicates.

**Comment 5 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Lily  
Last Name: Mitchell  
Email Address: l Mitchell@hanmor.com  
Affiliation: SCPPA

Subject: SCPPA comments on proposed changes to LCFS Regulation  
Comment:

Please find attached the comments of the Southern California Public Power Authority on the proposed changes to the Low Carbon Fuel Standard Regulation.

Attachment: [www.arb.ca.gov/lists/lcfs2011/6-300226001lmm12021101\\_scppa\\_45-day\\_comment\\_on\\_lcfs\\_regs.pdf](http://www.arb.ca.gov/lists/lcfs2011/6-300226001lmm12021101_scppa_45-day_comment_on_lcfs_regs.pdf)

Original File Name: 300226001lmm12021101 SCPPA 45-day comment on LCFS regs.pdf

Date and Time Comment Was Submitted: 2011-12-02 18:36:41

No Duplicates.



**Comment 6 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Association  
Last Name: American Lung  
Email Address: msweinberger@hotmail.com  
Affiliation: in California Supporters

Subject: Form Letter # 2  
Comment:

Dec 5, 2011

Chairman Nichols  
1001 I Street  
Sacramento, CA 95812

Dear Nichols,

I support the California Air Resources Board's leadership in bringing about landmark laws and policies to fight climate change and protect public health. The Low Carbon Fuel Standard is a critical piece of California's AB 32 program and I urge you to reject the oil industry's efforts to weaken the standard.

The Low Carbon Fuel Standard must properly account for dirtier, higher carbon fuels and CARB must stay the course in implementing this critical clean air program on schedule. I urge CARB to support a strong LCFS that fully accounts for all the air quality and environmental impacts of petroleum fuels and does not give a "pass" to dirtier fuels.

I join with the American Lung Association in California in urging you to ensure that California's fuels become cleaner over the next decade to support clean air, public health and spur investment in alternatives to dirty oil.

Sincerely,

Mr. Mark Weinberger  
391 28th Ave  
San Francisco, CA 94121-1867

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-06 10:29:43

671 Duplicates.

**Comment 7 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Clark  
Last Name: Nakamura  
Email Address: clarknakamura@yahoo.com  
Affiliation: Oil Supply and Distribution

Subject: LCFS Regulation  
Comment:

To Whom It May Concern:

Given that we aren't even sure that there will be sufficient blending stocks to comply with this measure, why are we moving forward? Would it hurt to do more research on how this regulation could actually be successful before pushing an extremely costly burden on an economically crippled region? Fuel prices account for a larger portion of our budgets than they ever have, yet we are thinking of ways to increase them further during the largest recession we've seen in our generation. We all want clean air and we all want to find ways to become more independent in our fuel supply. Please reconsider more attainable and achievable goals for this regulation.

Respectfully,  
Clark Nakamura

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-08 09:44:16

No Duplicates.

**Comment 8 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Tony  
Last Name: Andreoni  
Email Address: tandreoni@cmua.org  
Affiliation: California Municipal Utilities Assoc.

Subject: LCFS Rule Amendments - Comments  
Comment:

Please see our attached comment letter.

Attachment: [www.arb.ca.gov/lists/lcfs2011/13-arb\\_lcfs\\_comment\\_doc\\_w\\_header\\_12\\_8\\_2011\\_letterhead\\_final.pdf](http://www.arb.ca.gov/lists/lcfs2011/13-arb_lcfs_comment_doc_w_header_12_8_2011_letterhead_final.pdf)

Original File Name: ARB LCFS Comment doc w header 12\_8\_2011\_letterhead final.pdf

Date and Time Comment Was Submitted: 2011-12-08 16:30:55

No Duplicates.

**Comment 9 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Max

Last Name: Baumhefner

Email Address: mbaumhefner@nrdc.org

Affiliation: Natural Resources Defense Council

Subject: Comments of NRDC on Proposed Amendments to the LCFS

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/15-comments\\_of\\_nrdc\\_on\\_proposed\\_amendments\\_to\\_the\\_lcfs.pdf](http://www.arb.ca.gov/lists/lcfs2011/15-comments_of_nrdc_on_proposed_amendments_to_the_lcfs.pdf)

Original File Name: Comments of NRDC on Proposed Amendments to the LCFS.pdf

Date and Time Comment Was Submitted: 2011-12-09 13:19:50

No Duplicates.

**Comment 10 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Heywood

Last Name: Sobel

Email Address: sobel@go2cec.com

Affiliation:

Subject: Low Carbon Fuel Standard Regulations

Comment:

It would be a bad idea to weaken the Low Carbon Fuel Standard Regulations. Yes, it will cost money to implement them; however, it will take employees to do it. Carbon Dioxide and other hydrocarbons in the atmosphere are a significant source of climate change. We, in the US, are not stepping up to our responsibilities to help slow the global rate of carbon emissions. At the least California should not back off from what is an acceptable step in the right direction.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 07:50:21

No Duplicates.

**Comment 11 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Jim  
Last Name: Nixon  
Email Address: jimnixon2000@yahoo.com  
Affiliation:

Subject: Amendments to the Low Carbon Fuel Standard Regulation  
Comment:

I am very concerned for my daughter's and grandson's health in the future. DO NOT KICK THE GAS CAN DOWN THE ROAD. Doing so is dangerous to my daughter and grandson's physical health.

More and more I am becoming aware of the cost of "Kicking the Can" Just look at the problems caused by Local, County, State and Federal agencies for doing so.

I hope what seems obvious and straight forward to me becomes clear to you and you consider the human health issue versus the corporate health issue.

Thank you

Jim Nixon

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 07:50:14

No Duplicates.

**Comment 12 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Scott

Last Name: Weikart

Email Address: scott@benetech.org

Affiliation:

Subject: Low Carbon Fuel standard addresses massive market failure

Comment:

Our auto fueling infrastructure exists in the context of a massive market failure. There's a tiny tax on gasoline, totally inadequate to the task of paying for the health effects of auto pollution, and minimizing the existential threat to our climate from global warming due to human creation of greenhouse gases.

I urge you to stand firm on requirements in our Low Carbon Fuel standard.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 08:28:44

No Duplicates.



**Comment 13 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Joseph S.

Last Name: Cox

Email Address: exact1er@yahoo.com

Affiliation:

Subject: Low carbon fuel standards change

Comment:

I am writing to you today to say I am for any and all improvements to the current low fuel carbon standard that is in operation. I however do not agree with certain emission restriction standards, particularly those concerning the addition of some aftermarket headers that are not CARB certified but offer more than sufficient air to fuel ratios and are better than some that are certified.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 08:48:13

No Duplicates.

**Comment 14 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Donald  
Last Name: McLeod  
Email Address: mcsas@att.net  
Affiliation:

Subject: I Appreciate Your Efforts  
Comment:

I've been following the efforts of the ARB over the years and I appreciate your work to give us better air. Please continue to do all you can to give our citizens and especially our kids with respiratory problems clean molecules to breathe.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 08:53:30

No Duplicates.

**Comment 15 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Richard  
Last Name: Cohen  
Email Address: campcohen@aol.com  
Affiliation: Retired

Subject: Clean air  
Comment:

Let's continue to have CA be a state I can be proud to live in! Since I moved here from NJ (Yes, near the Turnpike with all the refineries!), I have really enjoyed the cleaner air and happier lungs. So I'm not just happier, but will be able to gloat for even longer as people in other states die early from refinery and tailpipe emissions!

(Dr.)Richard Cohen

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 09:21:27

No Duplicates.

**Comment 16 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Susan

Last Name: Walp

Email Address: susanwalp@gmail.com

Affiliation:

Subject: less air pollution

Comment:

Please advocate cleaner-burning fuels or energy sources that don't require combustion at all. Southern California is beautiful when you can see the mountains, and it should always be this way.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 09:26:47

No Duplicates.

**Comment 17 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: marcy

Last Name: vaj

Email Address: themarce2000@yahoo.com

Affiliation:

Subject: airline fuel

Comment:

I live near the Santa Monica Airport (SMO) where fuel garbage rains down on us daily. I know firsthand the deleterious effects of dirty fuel. I feel it is your responsibility to protect me from these harmful materials. It is know that small aircraft fuel is still leaded and yet no one seems to be monitoring this or changing regulations. I demand, as a tax-paying citizen, that you take the health of our population to heart and rule to clean up aircraft fuel.

Marcy Vaj, Venice, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 09:57:18

No Duplicates.

**Comment 18 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Janet

Last Name: Westbrook

Email Address: jwest@ridgenet.net

Affiliation:

Subject: Strengthen the Low Carbon Fuel Standards!

Comment:

We've done a good job cleaning up the air from the mess it was in the 60's, but we need to keep at it!! I urge you to do whatever it takes to strengthen the low carbon fuel standards for California and keep them that way, and do whatever it takes to ignore lobbyists who try to convince you otherwise. Those "big oil" people don't live in California - we do. Cleaner air is a good thing!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 10:25:23

No Duplicates.

**Comment 19 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Rainer  
Last Name: Heckmaier  
Email Address: Uhachinger@aol.com  
Affiliation: NONE

Subject: Clean environment  
Comment:

Without being a "treehugger", common sense and the realization that my family as well as I are DEEPLY affected by the largely self-serving, INDUSTRY DRIVEN AND INDUSTRIAL FINANCIALLY supported votes being cast, represent a "1 STEP FORWARD AND 10 STEP BACKWARD" solution to a world-wide problem.

Constantly running for re-election, I can only surmise, that their "involvement" eventually results in "personal" gain for these individuals, who's singular real goals are driven by their desire to keep feeding from the public "trough" as long as possible. With some exceptions, most of these "leaders" arrive, after being elected, at their "posts" with limited funds and otherwise mostly average future expectations. These expectations "miraculously" allow them to rise in income and with benefits few would attain, had they pursued career paths like the "Real Taxpayers" do, of whose, ever increasing taxes in various forms, they live.

PLEASE MAKE AN EFFORT TO ACT IN THE INTERESTS OF THE PUBLIC AND THOSE OF THE DECEDEENTS OF TODAYS VOTERS.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 10:35:07

No Duplicates.

**Comment 20 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Diane  
Last Name: Reeve  
Email Address: dcharlotter@yahoo.com  
Affiliation:

Subject: Reducing Air Pollution  
Comment:

I live in Benicia. The San Francisco Bay Area is experiencing the fourth "spare the air day" in a row. Some of the blame is due to wood burning fireplace, but the main culprit is still the pollutions from cars and trucks. How can you seriously think that allowing higher polluting fuel will not make this situation worse? Please continue your policies of encouraging and enforcing low pollution fuels so that we all have a chance to have air we can breathe.

Thank you, Diane C. Reeve

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 10:35:40

No Duplicates.



## **Comment 21 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Ellen  
Last Name: McRae  
Email Address: siwaban@gmail.com  
Affiliation:

Subject: Clean fuel laws  
Comment:

I am a native Californian born with severe asthma. When I was a child growing up the air quality in some places like LA, San Fernando Valley and San Bernardino was horrendous. Frequently my eyes burned and my need for medication went up. Thank God some people wised up and passed some clean fuel requirements, enabling the smog to go down at least somewhat since the 1970s.

The selfishness and small-mindedness of the oil and coal industries who, recognising that these resources are finite and who now want freedom to engage in any form of high-pollution production and/or composition of fuel, or any relaxation of air quality regulations. There are many people like myself, born with asthma and other severe respiratory allergies--for whom smog represents a consignment to early death. Just because we were born with this handicap does not make us 2nd class citizens, forced to give up part of our lives to let the industries fill their bank accounts.

The oil and coal industries need to move forward, not backward. It is past time for American ingenuity to come up with something better than tar sands mining, fracking and other energy sources fraught with more extreme pollution. It's time to get engineers and scientists on the job designing the energy sources of the 21st Century--fund these efforts with the money now used to subsidise old dirty technologies. And don't cave into the old industry hacks who want to prolong the 20th Century thinking.

Sincerely,  
Ellen McRae

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 11:28:15

No Duplicates.

**Comment 22 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Mark

Last Name: Hein

Email Address: markheindr@yahoo.com

Affiliation:

Subject: Carbon Fuel Standard

Comment:

I fully support California's low carbon fuel standard, and I urge you to resist industry efforts to weaken it. CARB was created to safeguard California's air quality -- not to make corporations profitable. And frankly, corporations that have money to waste on funding false science and on lobbying deserve to go out of business.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 12:19:25

No Duplicates.

**Comment 23 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Bruce  
Last Name: Ackerman  
Email Address: brucea@laughingcrows.net  
Affiliation:

Subject: Comment for lcfs2011: Support vehicle electrification  
Comment:

We drive a Chevy Volt, and absolutely love it. In over 10,000 miles so far, we have averaged 136 miles per gallon. It is a roomy, well-equipped, extremely safe and responsive vehicle, and we use it almost exclusively. As a medical professional, my wife needs extremely reliable transportation, and this is it.

When we can, we hope to buy an all-electric as well, to replace our second car (which is now rarely used).

There is major pent-up demand for new cars, as people have been unable to afford them during the recession.

Please do everything you possibly can to support the continued leadership of California in bring electric vehicles and plug-in hybrids (Extendd range electric vehicles) to market at scale.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 12:42:57

No Duplicates.

**Comment 24 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Fritz  
Last Name: Sparks  
Email Address: emsfritz@yahoo.com  
Affiliation:

Subject: Low carbon fuel  
Comment:

When will the need of the entire population be considered and not just those whose interests lie in maximizing their profits. I am a small businessman and have no fear or concern over the word profit, but I do have a concern for not only me, but for my children and grandchildren as well. In our capitalistic society we need profits in order for us to grow and prosper, but not when profits are originated from policies that endanger us all and our health.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 13:20:18

No Duplicates.

**Comment 25 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Charlotte  
Last Name: Pirch  
Email Address: dpirch@socal.rr.com  
Affiliation: none

Subject: Low Carbon Fuel Standard  
Comment:

I strongly support the low carbon standard as proposed. Any rollback would make our air less breathable. It is important to set a standard that supports cleaner air than that which we currently have.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 16:25:49

No Duplicates.

**Comment 26 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Carole  
Last Name: Estrup  
Email Address: Carole@caroleestrup.com  
Affiliation: citizen

Subject: Clean Energy  
Comment:

My husband and I have lived in the lower Sierras in California for over 30 years, and during this time we have run our entire home on solar energy. Back in "those" days, not a lot of information was available on solar energy, but through books and articles we taught ourselves how to set up an installation of panels. I might add, this was done on a very limited budget, and as money was available, we added and updated our setup. When power outages occur in this area, it has no effect on us and our neighbors who have followed suit. Needless to say, we have had reliable energy, minus no interruptions and no utility bills. And, no negative impact on the environment. Goooo solar!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 17:36:00

No Duplicates.

**Comment 27 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Mathias

Last Name: van Thiel

Email Address: mvthiel@sbcglobal.net

Affiliation:

Subject: assure clean fuels and clean producton

Comment:

To avoid the devastating effects of the Climate Change currently under way, as the oceans warm, it is imperative that the power sources we use are as clean as possible to counter the warming effect that they have. both production and consumption need to improve to limit the warming of our globe and the devastating effects of storms floods and rise in ocean levels.

Please make sure tat fuel production and extraction are also clean and free fron polluting accidents.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 20:28:43

No Duplicates.

**Comment 28 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Roy

Last Name: Nakadegawa

Email Address: rnakadegawa@myfastmail.com

Affiliation:

Subject: Support Cleaner Burning Fuels

Comment:

ARB should press for the use of Cleaner Burning Fuels and not just Electric Powered Vehicles.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-10 21:40:55

No Duplicates.



**Comment 29 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Alan

Last Name: Francisco

Email Address: alanfrancisco@hotmail.com

Affiliation:

Subject: Low Carbon Fuel Standard

Comment:

I support the proposed amendments to the Low Carbon Fuel Standard.  
I hope you will adopt them. Thank you for your time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-11 10:29:02

No Duplicates.

**Comment 30 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Max

Last Name: Baumhefner

Email Address: mbaumhefner@nrdc.org

Affiliation: Natural Resources Defense Council

Subject: Additional Comments of NRDC on Proposed Amendments to the LCFS

Comment:

Please see attached for additional comments.

Attachment: [www.arb.ca.gov/lists/lcfs2011/37-additional\\_comments\\_of\\_nrdc\\_on\\_proposed\\_amendments\\_to\\_the\\_lcfs.pdf](http://www.arb.ca.gov/lists/lcfs2011/37-additional_comments_of_nrdc_on_proposed_amendments_to_the_lcfs.pdf)

Original File Name: Additional Comments of NRDC on Proposed Amendments to the LCFS.pdf

Date and Time Comment Was Submitted: 2011-12-11 16:02:18

No Duplicates.

## **Comment 31 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: brad

Last Name: roon

Email Address: bradroon@yahoo.com

Affiliation: alleged human being

Subject: Air quality

Comment:

I suspect we all know that in 1949 General Motors was convicted of "a conspiracy to destroy the mass transit system of the United States." We also know they received a slap on the wrist and then did it with the collusion of many companies dealing in expendables, chief among the expendables being petro.

In essence, when an elder or person with a compromised respiratory system must stay inside or actually dies from pollution - and it happens - we can lay these deaths and loss of freedoms at the feet of a corporation which had become sociopathic. One which placed the monetary interests of it's officers and shareholders above the public good, and public health. This is literally psychotic, and this same mindset is trying to convince you that somehow the exacerbation of these problems is in your best interest.

The actual truth is somewhat contrary to that. Even if they bribe you and lobby you for these adverse impacts on public health, you still will be forced to breathe the bad air. You will have more unhealthy toxins flood the environment and settling into your water and food supplies. Your children and grandchildren will be adversely impacted. Why? So that a few other people make even more money than they already do as they rake in record profits in hard economic times.

Don't you question why they see a huge need for increased pollution when they personally are quite comfortable? It would seem that if they are having corporate difficulty they could take the billions of dollars in shareholder payouts, executive bonuses and salaries, and reinvest these monies in improved technologies and processes. Maybe even build a new refinery for the first time in over 30 years in the US. Wow, crazy!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-12 08:08:36

No Duplicates.

**Comment 32 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Valerie

Last Name: Ughetta

Email Address: vughetta@autoalliance.org

Affiliation: Alliance of Automobile Manufacturers

Subject: LCFS Proposed Amendments 10-26-11

Comment:

Steve Douglas of the Alliance California office will attend the hearing and make a very short statement. His telephone number is: 916-538-1197.

Attachment: [www.arb.ca.gov/lists/lcfs2011/39-11-12-12\\_alliance\\_comments\\_on\\_lcfs\\_amendments\\_october\\_26\\_\\_2011.pdf](http://www.arb.ca.gov/lists/lcfs2011/39-11-12-12_alliance_comments_on_lcfs_amendments_october_26__2011.pdf)

Original File Name: 11-12-12 Alliance Comments on LCFS Amendments October 26, 2011.pdf

Date and Time Comment Was Submitted: 2011-12-12 08:57:58

No Duplicates.

**Comment 33 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Douglas

Last Name: Heath

Email Address: Douglas.Heath@NRCan-RNCan.gc.ca

Affiliation:

Subject: Natural Resources Canada

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/40-canada.pdf](http://www.arb.ca.gov/lists/lcfs2011/40-canada.pdf)

Original File Name: Canada.pdf

Date and Time Comment Was Submitted: 2011-12-12 09:41:15

No Duplicates.

**Comment 34 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Conservation Voters  
Last Name: California League of  
Email Address: reinhardt@stanford.edu  
Affiliation: Supporters

Subject: Form Letter # 3  
Comment:

Dear California Air Resources Board Members:

I urge you to uphold and protect California's low carbon fuel standard. The standard protects the health of Californians, helps cure us of our dangerous addiction to oil, and creates jobs producing cleaner fuels to help meet our long-term climate goals.

By reaffirming your strong support for the standard, you will send a strong signal that California is serious about moving from being one of the biggest importers of oil to a leading exporter of clean energy. The board should also vote to ensure that oil companies are not only phasing in cleaner fuels, but phasing out the dirtier ones. I urge you to direct Air Resources Board staff to strengthen their proposal by ensuring that each oil refinery properly accounts for its use of dirtier oil sources -- like tar sands -- that only take us backwards.

Please vote to strengthen California's leadership in clean energy and reject attempts by oil companies to undermine our low carbon fuel standard.

Trudi Reinhardt  
3440 Kenneth  
Palo Alto, CA 94303

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-12 10:10:52

4949 Duplicates.

**Comment 35 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Simon  
Last Name: Mui  
Email Address: smui@nrdc.org  
Affiliation:

Subject: NRDC Supplemental Information on Investments  
Comment:

Attached,  
Please find supplemental information from NRDC on investments in  
renewable fuels.

Thank you

Attachment: [www.arb.ca.gov/lists/lcfs2011/42-  
comments\\_of\\_nrdc\\_on\\_oil\\_industry\\_investments\\_lcfs.pdf](http://www.arb.ca.gov/lists/lcfs2011/42-comments_of_nrdc_on_oil_industry_investments_lcfs.pdf)

Original File Name: Comments of NRDC on Oil Industry Investments\_LCFS.pdf

Date and Time Comment Was Submitted: 2011-12-12 11:14:39

No Duplicates.

**Comment 36 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Doug  
Last Name: Morris  
Email Address: dougmorriscs@earthlink.net  
Affiliation: Private citizen and voter

Subject: Low Carbon Fuel Standard Regulation  
Comment:

Greetings,

Many of us live in areas where there is a blanket of smog during much of the year. I just paid \$1,000 for two bicycles so my wife and I can pollute less - so please continue the fight for cleaner air and resist changing these standards. Going backwards is not an option as would make San Joaquin Valley air even more filthy.

Thanks,

Doug Morris  
1406 Birch Ave.  
Clovis, CA 93611

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-12 14:27:58

No Duplicates.



**Comment 37 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Edwin

Last Name: Lombard

Email Address: edwin@lombardmgmt.com

Affiliation: Advocate Black Chambers of Commerce

Subject: Low Carbon Fuel Standard

Comment:

This would create higher fuel cost to minority owned businesses at a time when they least afford it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-12 15:50:11

No Duplicates.

**Comment 38 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison Company

Subject: SCE Comments to CARB on LCFS Amendments

Comment:

Please see attached comments from SCE on the LCFS regulatory amendments.

Attachment: [www.arb.ca.gov/lists/lcfs2011/45-sce\\_comments\\_to\\_carb\\_on\\_isor\\_december\\_2011.pdf](http://www.arb.ca.gov/lists/lcfs2011/45-sce_comments_to_carb_on_isor_december_2011.pdf)

Original File Name: SCE Comments to CARB on ISOR December 2011.pdf

Date and Time Comment Was Submitted: 2011-12-12 16:31:16

No Duplicates.

**Comment 39 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Nancy  
Last Name: Stein  
Email Address: Nancysteinar@gmail.com  
Affiliation:

Subject: low carbon fuel std regulation  
Comment:

Please do not weaken this law. I would like you to know that I recently bought a diesel - which cost half of what I make each year. I am so frustrated with the lack of action and care from gas/oil companies, and I want to do my part. Please don't let them whine that the public won't pay for carbon reduction. We, the 99%, will be the ones who suffer when there is no air/water. The 1% will always have the money to visit the moon, patagonia in a helicopter, etc. Back here on earth, we want change, and we are willing to both sacrifice and speak out, and VOTE to get it. This law has been passed. Please do not weaken the standards we must have to keep a liveable earth.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-12 20:23:25

No Duplicates.

**Comment 40 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Sophie Beth  
Last Name: Pettigrew  
Email Address: sophieb@sonic.net  
Affiliation:

Subject: Amendments to the Low Carbon Fuel Standard Regulation  
Comment:

I support a pipeline from Canada. I support our having enough of our own gasoline, propane, and fossil fuels to provide all our own fuels and not be beholden to Saudi Arabia and other oil producing countries. Going totally to "clean" fuels is now and will be too expensive to be economically sound policy. I do not support forcing any company to spend for additional cleaner burning fuel. I do not support adding to California's current carbon fuel standards. They are difficult enough to adhere to already.

Mandated California gasoline has fewer miles per gallon than gasoline provided in other states. Lower mileage makes for foolish economics.

Don't increase restrictions on gasoline. Don't make steeper and more restrictive carbon fuel standards the norm in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-12 22:02:41

No Duplicates.

**Comment 41 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: creheis@wspa.org  
Affiliation:

Subject: Western States Petroleum Association  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/51-wspa\\_comment.pdf](http://www.arb.ca.gov/lists/lcfs2011/51-wspa_comment.pdf)

Original File Name: WSPA comment.pdf

Date and Time Comment Was Submitted: 2011-12-13 11:07:40

No Duplicates.

**Comment 42 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 43 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Tom  
Last Name: Boellstorff  
Email Address: tboellst@gmail.com  
Affiliation:

Subject: support cleaner burning fuels  
Comment:

Today, I will be purchasing an all-electric Nissan Leaf - I'm very excited about this and that I'm doing all I can to protect our air in California. I need you to be just as proactive in this regard.

It's for this reason that I urge you to uphold and protect California's low carbon fuel standard. The standard protects the health of Californians, helps cure us of our dangerous addiction to oil, and creates jobs producing cleaner fuels to help meet our long-term climate goals.

By reaffirming your strong support for the standard, you will send a strong signal that California is serious about moving from being one of the biggest importers of oil to a leading exporter of clean energy. The board should also vote to ensure that oil companies are not only phasing in cleaner fuels, but phasing out the dirtier ones. I urge you to direct Air Resources Board staff to strengthen their proposal by ensuring that each oil refinery properly accounts for its use of dirtier oil sources -- like tar sands -- that only take us backwards.

Please vote to strengthen California's leadership in clean energy and reject attempts by oil companies to undermine our low carbon fuel standard.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-13 12:48:46

No Duplicates.



## **Comment 44 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Ronald

Last Name: Cohen, PhD

Email Address: rcohen1308@sbcglobal.net

Affiliation:

Subject: We Must Take Steps Reduce Greenhouse Gas Emissions Now

Comment:

To Whom It May Concern:

The world-wide "greenhouse effect" caused by man's emission of CO<sub>2</sub>, CH<sub>4</sub> and other well known "greenhouse gases" is of immediate and vital concern to national security, public health and ultimately, survival of our civilization. This story is well known in all its details and time scales, and scientifically validated. This is not a linear problem: once we cross some thresholds, they take millennia to be "re-crossed."

We in CA must very significantly reduce our emission of greenhouse gases in the near and far terms, and one near-term way is to reduce/prohibit the use of "high carbon fuels" such as coal, heavy oil fractions, tar sands and other "reduced" forms of fossil fuels as sources of energy throughout, including in "power generating plants." To accomplish that, we need a strong reduction in the use of fossil fuels, and, of course, we need to support the development and evolution of non-fossil sources of energy at the scales needed to support the public's needs. These "green" power sources include solar, bird-safe wind, tidal and nuclear power, and advanced batteries for mobile applications.

If we don't take the lead in reduction and ultimate elimination of the use of fossil fuels, the cost of replacing our great coastal cities, inland agricultural, forestry and animal food production areas (note that most of the farming areas are within a few feet of sea level), changing our very expectations from all conventional sources of food from the land and the sea (already in danger from acidification from increased CO<sub>2</sub> burden), and protecting ourselves and our plant and animal life from tropical diseases and others will far far exceed the immediate costs of moving from a fossil fuel economy to a "renewable" power economy. Please do not bow down to the lobbying of the rich and powerful fossil fuel economy: they will take their profits and invest in survival homes in Switzerland and other mountainous areas, leaving us to drown, die of hunger or disease. Seems extreme? Not if we ignore this problem and follow the lead of the spokesmen of the fossil fuel companies.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-13 13:09:56

No Duplicates.

**Comment 45 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: LINDA

Last Name: STOCK

Email Address: ljstock@earthlink.net

Affiliation: Retired Teacher & Current Airbreather

Subject: Air Standards

Comment:

California has done so much to clean up our air since I was a child and the smog burned my skin, eyes, and lungs, especially during the summer when I wanted to play. We still see the smog when we return into the valley from the north. It lays like a layer of soot over us.

I know you have taken a lot of heat from the business community, who are also vital to our survival. However, without clean air to breathe, we would all die--although our pockets may be full of worthless dollars--because without clean air, there would be no life.

Please hold the line. California is a gift to the people. Please don't dirty it, not just for me, but for future generations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-13 13:19:13

No Duplicates.

**Comment 46 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Meg  
Last Name: Meal  
Email Address: mmeal@swater.org  
Affiliation: SFPUC

Subject: Comments Regarding Initial Statement of Reasons and Proposed Amendments to the LCFS

Comment:

Please see the attached comments from SFPUC regarding the considered amendments to the Low Carbon Fuel Standard Regulation.

Attachment: [www.arb.ca.gov/lists/lcfs2011/59-sfpuc\\_lcfs\\_45day\\_comments.pdf](http://www.arb.ca.gov/lists/lcfs2011/59-sfpuc_lcfs_45day_comments.pdf)

Original File Name: SFPUC\_LCFS\_45day\_Comments.pdf

Date and Time Comment Was Submitted: 2011-12-13 13:42:58

No Duplicates.

**Comment 47 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Betty Jane  
Last Name: Wilhoit  
Email Address: bettyjanesnow@gmail.com  
Affiliation:

Subject: Protect California's clean air standards  
Comment:

The health of our communities should take precedence over special interests'heavily funded attempts to weaken our air standards!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-13 13:43:42

No Duplicates.

**Comment 48 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Patrick  
Last Name: Neargarder  
Email Address: pat100@pnear.com  
Affiliation: Independent

Subject: Hearing to Consider Amendments to the Low Carbon Fuel Standard Regulation  
Comment:

I did a tour a China last April. I had a hard time breathing and had a cough while there and for a week after leaving. I do not want to see that happen here.

I urge you to uphold and protect California's low carbon fuel standard. The standard protects the health of Californians.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-13 14:41:46

No Duplicates.

**Comment 49 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Frances

Last Name: Goff

Email Address: frananth@netzero.com

Affiliation:

Subject: Low Carbon Fuel Standard Regulation

Comment:

Do not let Big Energy off the hook; part of the problem with converting to sustainable, non-climate-threatening energy is that there is no regulation or weak regulation. Oil companies have proved they cannot, will not police themselves. You have to do it. Plus, get some enforcement into it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-13 17:36:36

No Duplicates.

**Comment 50 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Terry Ellen

Last Name: Robinson

Email Address: terobinson07@gmail.com

Affiliation:

Subject: Low Carbon Fuel Standard Regulation

Comment:

California has been steadily working on reducing carbon in California air. We must continue to do this to keep our lungs healthy and avoid preventable deaths.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-13 18:33:08

No Duplicates.



**Comment 51 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Jamie

Last Name: Knapp

Email Address: jamie@jknappcommunications.com

Affiliation:

Subject: Environmental, health, groups from around the world support LCFS

Comment:

Comment letter attached

Attachment: [www.arb.ca.gov/lists/lcfs2011/73-ngo\\_lcfs\\_sign-on\\_letter-final12-14-11.pdf](http://www.arb.ca.gov/lists/lcfs2011/73-ngo_lcfs_sign-on_letter-final12-14-11.pdf)

Original File Name: NGO\_LCFS\_Sign-on\_letter-final12-14-11.pdf

Date and Time Comment Was Submitted: 2011-12-13 21:19:18

No Duplicates.

**Comment 52 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Ashley

Last Name: Wyatt

Email Address: ashlemo8@gmail.com

Affiliation:

Subject: I support cleaner burning fuels

Comment:

Oil companies and their well-funded lobbyists are hard at work in Sacramento to undermine California's "low carbon fuel standard," which requires oil companies to invest in alternative energy sources. It also prevents some of the dirtiest fossil fuel sources—such as tar sands—from being used in California.

I support your plans to propose changes. Please ensure that companies use cleaner, low carbon fuel.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-14 00:45:30

No Duplicates.

**Comment 53 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Manly  
Last Name: Norris  
Email Address: ManlyNorris@gmail.com  
Affiliation:

Subject: Oil Lobbying  
Comment:

How is it that Western States Petroleum Association and Chevron can spend \$7 million on lobbying their case in California, without breaking some kind of rule? The public interest is what matters, and I have hope that California will continue to set an excellent example for everyone else. Thank you.

Whatever happiness is in the world  
Has all arisen from a wish for the  
Welfare of other beings.  
Whatever misery there is has arisen  
From indulging in selfishness.

Buddhist precept

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-14 05:51:48

No Duplicates.

**Comment 54 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Jay  
Last Name: McKeeman  
Email Address: jaymck@cioma.com  
Affiliation: CIOMA

Subject: Request to Suspend LCFS  
Comment:

Please see attached letter to all CARB Board members.

Attachment: [www.arb.ca.gov/lists/lcfs2011/77-cioma\\_suspend\\_lcfs\\_letter\\_12-14-11.pdf](http://www.arb.ca.gov/lists/lcfs2011/77-cioma_suspend_lcfs_letter_12-14-11.pdf)

Original File Name: CIOMA suspend LCFS letter 12-14-11.pdf

Date and Time Comment Was Submitted: 2011-12-14 09:05:14

No Duplicates.

**Comment 55 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Ralph  
Last Name: Moran  
Email Address: moranrj1@bp.com  
Affiliation:

Subject: LCFS Treatment of Crude Oil  
Comment:

BP Comments

Attachment: [www.arb.ca.gov/lists/lcfs2011/78-dan\\_sperling\\_lcfs\\_hcico\\_12\\_11.pdf](http://www.arb.ca.gov/lists/lcfs2011/78-dan_sperling_lcfs_hcico_12_11.pdf)

Original File Name: Dan Sperling LCFS HCICO 12 11.pdf

Date and Time Comment Was Submitted: 2011-12-14 10:03:39

No Duplicates.

**Comment 56 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Hal  
Last Name: Voege  
Email Address: halvoege@yahoo.com  
Affiliation:

Subject: Low carbon fuel  
Comment:

Seven of the most smoggy cities in the country are in California's central valley. I moved from there because I didn't want to breathe that air. Many people don't have that option. Please continue to work to limit carbon emissions in spite of industry opposition. We, who live in this beautiful state, understand and accept that additional refining will effect the cost of fuel, but improved air quality is worth the price.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-14 10:01:17

No Duplicates.

**Comment 57 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Tom

Last Name: Faust

Email Address: tfaust@redwoodrenewables.com

Affiliation: Redwood Renewables

Subject: Support for Low Carbon Fuel Standard

Comment:

We support the Low Carbon Fuel Standard. This standard will provide an economic stimulus for economic growth in California. Why because rather than paying \$4 a gallon for fuel residents will be able refuel their Lithium battery cars at a cost of 25¢ a gallon equivalent saving about \$2,000 a year of fuel costs by going Renewables as opposed to gasoline. New financing is available through Residential lease financing offering Zero Down systems and through Housing and Urban Development Administration to make the cost of acquiring distributed energy affordable and economic as opposed to maintaining the status quo.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-14 11:20:02

No Duplicates.

**Comment 58 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: California  
Last Name: Fueling  
Email Address: bfl@platinumadvisors.com  
Affiliation:

Subject: Low Carbon Fuel Standard  
Comment:

Please accept this letter from Fueling California regarding the public hearing to consider amendments to the Low Carbon Fuel Standard Regulation.

Attachment: [www.arb.ca.gov/lists/lcfs2011/85-fueling\\_ca\\_-\\_lcfs\\_letter.doc](http://www.arb.ca.gov/lists/lcfs2011/85-fueling_ca_-_lcfs_letter.doc)

Original File Name: Fueling CA - LCFS Letter.doc

Date and Time Comment Was Submitted: 2011-12-14 11:27:36

No Duplicates.



**Comment 59 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Michael  
Last Name: Whatley  
Email Address: [mwhatley@consumerenergyalliance.org](mailto:mwhatley@consumerenergyalliance.org)  
Affiliation:

Subject: Form Letter #4  
Comment:

Attached are 63 form letters from the Consumer Energy Alliance relating to the Consideration of Amendments to the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/lcfs2011/87-form\\_letter\\_4.pdf](http://www.arb.ca.gov/lists/lcfs2011/87-form_letter_4.pdf)

Original File Name: Form Letter 4.pdf

Date and Time Comment Was Submitted: 2011-12-14 11:44:24

63 Duplicates.

**Comment 60 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Annie

Last Name: Pham

Email Address: annie.pham@sierraclub.org

Affiliation: Sierra Club California

Subject: Form Letter #5: Keep the Low Carbon Fuel Standard Strong

Comment:

Please find attached 2662 comments from Sierr Club California member

Attachment: [www.arb.ca.gov/lists/lcfs2011/88-86-low\\_carbon\\_standard\\_letters\\_to\\_carb.zip](http://www.arb.ca.gov/lists/lcfs2011/88-86-low_carbon_standard_letters_to_carb.zip)

Original File Name: 86-low\_carbon\_standard\_letters\_to\_carb.zip

Date and Time Comment Was Submitted: 2011-12-14 12:04:52

2662 Duplicates.

**Comment 61 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Geoff

Last Name: Cooper

Email Address: gcooper@ethanolrfa.org

Affiliation: Renewable Fuels Association

Subject: RFA Comments re: Amendments to LCFS

Comment:

Comments attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/92-rfa\\_comments\\_lcfs\\_amendments\\_dec16.pdf](http://www.arb.ca.gov/lists/lcfs2011/92-rfa_comments_lcfs_amendments_dec16.pdf)

Original File Name: RFA Comments\_LCFS Amendments\_DEC16.pdf

Date and Time Comment Was Submitted: 2011-12-14 13:33:04

No Duplicates.

## Comment 62 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.

First Name: Harvey

Last Name: Eder

Email Address: harveyederpspc@yahoo.com

Affiliation: Public Solar Power Coalition & Self

Subject: Natural Gas GREET LCFS Emissions Should Be Increased Now

Comment:

Howdy CARB,

Cc: "Harvey Eder" <harveyederpspc@yahoo.com>Message contains attachments4 Files (2467KB) | Download  
AllEmissionsCNG&DieselBuses.pdfShindell-Methane34&105.pdfGHG footprint of natural gas from shale formations.pdfLandfill-gas-to-energyIncreasesGHG-Jul11.pdfCorrect the LCFS GREET to account for fugitive natural gas emissions

The GREET standards used for the LCFS do not correctly account for fugitive natural gas emissions and other GHG emissions.

1. CARB still uses a methane carbon intensity of 25 times CO<sub>2</sub>, instead of the latest science saying it is 34 over 100 years or 105 over the next crucial 20 years, as shown in the paper by Drew T. Shindell, et al., "Improved Attribution of Climate Forcing to Emissions," Science 326, 716 (2009). (attached) When will CARB use the latest science?

2. The latest science says that methane produced by fracking has more fugitive emissions than conventional natural gas, which should be included in any LCFS for methane produced by fracking. The paper by Howarth, et al., says fracking "methane emissions are at least 30% more than and perhaps more than twice as great as those from conventional gas..) See attached paper, "Methane and the greenhouse-gas footprint of natural gas from shale formations," Climatic Change (2011) 106:679-690, downloadable from: DOI 10.1007/s10584-011-0061-5

3. GHG emissions from aged natural gas engines are considerably more than new engines, and should be included in the calculations. The paper by Melendez, et al., indicates in Fig. 14 on p. 22 that older natural gas engines could emit as much as 50% more emissions than new buses. See attached paper, "Emission Testing of Washington Metropolitan Area Transit Authority (WMATA) Natural Gas and Diesel Transit Buses," downloadable from:  
<http://www.afdc.energy.gov/afdc/pdfs/36355.pdf>

4. CARB has failed to account for even the EPA acknowledged 75% fugitive emissions related to methane from landfills (and it is probably more than 75% over the full life of a landfill), as compared to methane from contained anaerobic digesters of waste with 0 % fugitive emissions. See attached paper by Jim R. Stewart, "Landfill Gas-to-Energy Projects May Release More Greenhouse Gases Than Flaring,"

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(WINDOWS-1254) Arabic (ISO-8859-6, ASMO-708) Arabic  
(WINDOWS-1256) Hebrew (856) Hebrew (862) Hebrew (WINDOWS-1255) Chinese  
Simplified (GB-2312-80) Chinese Simplified (GB18030) Chinese  
Simplified (HZ-GB-2312) Chinese Simplified (ISO-2022-CN) Chinese  
Simplified (WINDOWS-936) Chinese Trad.-Hong Kong (BIG5-HKSCS) Chinese  
Traditional (BIG5) Chinese Traditional (EUC-TW) Japanese  
(SHIFT\_JIS) Japanese (EUC-JP) Japanese (ISO-2022-JP) Korean  
(ISO-2022-KR) Korean (EUC-KR) Thai (TIS-620-2533) Thai  
(WINDOWS-874) Vietnamese (TCVN-5712) Vietnamese (VISCII) Vietnamese  
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Attached is information that has been submitted to CARB staff over the past several months and several years for GHG LCFS from natural gas that needs to be addressed now in this review.

More data will be submitted.

This is off by orders of magnitude when combined and at the very least by several factors. Example, in CARB February 27, 2009 GREET for CNG a "placeholder" figure of 0.0375 grams methane per mile is used for natural gas emissions while the CARB papers sent for review of this issue on Washington D.C cng buses sent by Michael Benjamin & visa via Cody Livingston documents from 10 to 17+ grams CH<sub>4</sub> emitted per mile. More recently the April 2010 study of natural gas GHG methane emissions provided by SCAQMD has data of from 40 to 100 grams methane/CH<sub>4</sub> per mile emitted for heavy duty vehicles. Suspiciously the same number was used for nitrous oxide N<sub>2</sub>O of 0.0375 grams emitted per mile. This is off by over 100 to 1000 times the number used by CARB staff and nothing was done about it when brought up to staff on the record or by the Expert Work Group (several times). This will all be documented in detail in future litigation following CARB's Board's decision not addressing these issues.

Thanks, take care

Harvey Eder/ Public Solar Power Coalition

PS Natural Gas is the main competition for solar electric and solar hydrogen and our resources are limited and increasingly scarce.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-14 14:11:19

No Duplicates.

## **Comment 63 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: David  
Last Name: Atwater  
Email Address: gm@vandepol.us  
Affiliation: Business Person

Subject: LCFS

Comment:

I wish someone in government was actually here to help businesses survive instead of trying to, yet again, KILL CALIFORNIA. This theoretical plan is just that an unfeasible attempt to create draconian short term solutions to long term issues without listening OR RESPONDING, in any meaningful way, to the true stakeholders in the State. I am talking about businesses. We pay most of the taxes, provide all the services, feed and clothe every Californian. CARB does NONE OF THIS!

If there is going to be a plan it must be a REAL SOLUTION. Not a one sided attempt to "get those baaad polluters." CARB has showed no creativity, but expects an endless supply of patience and money from the businesses that make this State function.

Our Government is broke, businesses are struggling and/or leaving the state and yet we are continually force fed pipe dream regulation by an omnipotent organization that cares not for the regulated community, but only for the interests of this unionized bureaucracy and its continued growth.

Get real, use real science, and real technology, be practical and quit making up statistics to get what you want. The old saying in business is figures don't lie, but liars sure can figure.

Time for real long term solutions, not a parade of political gamesmanship.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-14 15:21:39

No Duplicates.

**Comment 64 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: John  
Last Name: Browning  
Email Address: johnbrowning@silvasoil.com  
Affiliation: Employee / Silvas Oil Company

Subject: Suspension of Low Carbon Fuel Standard (LCFS)  
Comment:

Silvas Oil Company is a Petroleum Marketer of fuels within Fresno,CA, Bakersfield,CA, Kingsburg,CA, Oxnard,CA and Santa Maria, CA. We respectfully requests that you immediately suspend the Low Carbon Fuel Standard (LCFS). This regulatory package could have the most significant impact on California fuel costs than ANY previous legislative/regulatory program has ever had. We are of the opinion that more information needs to be gathered before this standard is implemented.

Sincerely,

John Browning  
Special Projects Manager  
Silvas Oil Company  
PO Box 1048  
Fresno, CA 93714-1048

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-14 15:29:42

No Duplicates.



**Comment 65 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Mary  
Last Name: Solecki  
Email Address: mary@e2.org  
Affiliation:

Subject: E2 Clean Fuels  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/96-mary\\_solecki.pdf](http://www.arb.ca.gov/lists/lcfs2011/96-mary_solecki.pdf)

Original File Name: Mary Solecki.pdf

Date and Time Comment Was Submitted: 2011-12-14 15:51:38

No Duplicates.

**Comment 66 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: john  
Last Name: shipley  
Email Address: john@manningfuel.com  
Affiliation:

Subject: lcfs2011  
Comment:

The responsible analysis of LCFS regulations has NOT been done.  
The cost is too high for what could be zero improvements.  
This regulation plays with tens of millions of lives. It should not be implemented on a hope and prayer.  
Under all circumstances the following guarantee should be included in all regulations.

If this provision does not achieve the following empirical data by this year and month then the regulation will be null and void and the government will be responsible for reimbursing all citizens the LCFS related costs to their person.

Thank you for your time

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-14 16:02:52

No Duplicates.

**Comment 67 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Jenny

Last Name: Bard

Email Address: jenny.bard@lung.org

Affiliation: American Lung Association in California

Subject: Public Health Support for Low Carbon Fuel Standard

Comment:

Attached please find our letter in support of a strong LCSF signed by 24 health and medical organizations in California.

Attachment: [www.arb.ca.gov/lists/lcfs2011/99-public\\_health\\_group\\_lcfs\\_letter\\_12.14.11.pdf](http://www.arb.ca.gov/lists/lcfs2011/99-public_health_group_lcfs_letter_12.14.11.pdf)

Original File Name: Public Health Group LCFS Letter\_12.14.11.pdf

Date and Time Comment Was Submitted: 2011-12-14 16:47:36

No Duplicates.

**Comment 68 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Shelly  
Last Name: Sullivan  
Email Address: ssullivan@onemain.com  
Affiliation:

Subject: LCFS Comments  
Comment:

The attached coalition letter voices serious concerns about CARB's implementation of the LCFS regulation.

Should you have any questions or need anything further, please feel free to contact me.

Attachment: [www.arb.ca.gov/lists/lcfs2011/100-lcfs\\_coalition\\_letter\\_final\\_12-14-11.pdf](http://www.arb.ca.gov/lists/lcfs2011/100-lcfs_coalition_letter_final_12-14-11.pdf)

Original File Name: LCFS\_Coalition\_Letter\_FINAL\_12-14-11.pdf

Date and Time Comment Was Submitted: 2011-12-14 16:46:15

No Duplicates.

**Comment 69 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Newton

Last Name: H

Email Address: NewtHoenikker21@gmail.com

Affiliation:

Subject: NO MORE EXPENSIVE BRAZIL ETHANOL

Comment:

STOP THIS MADNESS

Attachment: [www.arb.ca.gov/lists/lcfs2011/101-brazil\\_ethanol.doc](http://www.arb.ca.gov/lists/lcfs2011/101-brazil_ethanol.doc)

Original File Name: Brazil ethanol.doc

Date and Time Comment Was Submitted: 2011-12-14 17:12:33

No Duplicates.

**Comment 70 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Betsy

Last Name: Reifsnider

Email Address: [betsy@interfaithpower.org](mailto:betsy@interfaithpower.org)

Affiliation: California Interfaith Power and Light

Subject: Low Carbon Fuel Standard

Comment:

California Interfaith Power and Light strongly supports the Low Carbon Fuel Standard and urges the Air Resources Board to resist any attempts to weaken it. With the strongest possible standard, California can continue to lead the way to a cleaner, healthier, and productive future that benefits all the people of our state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-14 19:57:30

No Duplicates.

**Comment 71 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Stephanie  
Last Name: Batchelor  
Email Address: stephaniebatchelor@hotmail.com  
Affiliation:

Subject: BIO LCFS comments  
Comment:

Thank you for your consideration of these comments.

Attachment: [www.arb.ca.gov/lists/lcfs2011/104-new\\_compressed\\_\\_zipped\\_\\_folder.zip](http://www.arb.ca.gov/lists/lcfs2011/104-new_compressed__zipped__folder.zip)

Original File Name: New Compressed (zipped) Folder.zip

Date and Time Comment Was Submitted: 2011-12-14 20:13:22

No Duplicates.

**Comment 72 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Robert

Last Name: Meyer

Email Address: sbharbor@west.net

Affiliation:

Subject: Low Carbon Fuel Standard Regulation

Comment:

To the Board Members of CARB. Please-Please Please use good judgement concerning implementation of Low Carbon fuel plan. Our state of California can NOT stand this type of burden on our economy now. Not now!! PLEASE !!! I sell fuel to our commercial fishing fleet in Santa Barbara. They are barely hanging on at today's fuel prices. Please don't put any more of them out of business with any more unnecessary regulations. Bob Meyer  
805.963.3808

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-14 20:54:57

No Duplicates.



**Comment 73 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: William  
Last Name: Coffey  
Email Address: Bilcofy@aol.com  
Affiliation:

Subject: stop tar-sands oil  
Comment:

To the Members of the California Air Resources Board:

I urge you to uphold and protect California's low-carbon fuel standard to reduce our dependence on dirty energy and fight global warming. I ask you to reject any rule changes that would weaken the standard.

The oil industry's attempt to exempt dirty, high-carbon fuels such as oil mined from Canadian tar sands is unacceptable. As currently crafted, the fuel standard is intended to encourage oil companies to invest in cleaner fuel solutions, reducing greenhouse gas pollution in California. The changes proposed by the oil industry would undermine these intentions.

The standard must ensure that oil companies are not only ramping up cleaner fuels but phasing out dirtier ones. The rule should be strengthened to require each oil refinery to properly account for its reliance on dirtier oil sources. By no means should the low-carbon fuel standard be weakened to accommodate the use of dirty and highly energy-intensive fuels like tar-sands oil.

Please vote to strengthen California's leadership on clean fuels and reject oil-company efforts to undermine the low-carbon fuel standard.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-14 22:43:27

No Duplicates.

**Comment 74 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Alex

Last Name: Kim

Email Address: akim@semprautilities.com

Affiliation: San Diego Gas & Electric

Subject: Incentivizing Electric Transportation

Comment:

Developing and facilitating the EV market is an important aspect of achieving CARB's greenhouse gas reduction goals. Using the value of LCFS credits to encourage the development of the market by benefiting PEV consumers is a major component of satisfying this goal. SDG&E concurs with statements by CARB staff in various LCFS workshops that it's paramount that the value of LCFS credits should be given to those who invest in EVs, as well as those who help to transform the market for electricity as a transportation fuel.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-14 23:11:24

No Duplicates.

**Comment 75 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Jay  
Last Name: Friedland  
Email Address: jay@pluginamerica.org  
Affiliation: Plug In America

Subject: Comments in Support of the LCFS regulation and LCFS credits for EVs  
Comment:

Please see attached file.

Attachment: [www.arb.ca.gov/lists/lcfs2011/108-arb\\_lcfs\\_pia\\_support\\_121411.pdf](http://www.arb.ca.gov/lists/lcfs2011/108-arb_lcfs_pia_support_121411.pdf)

Original File Name: ARB\_LCFS\_PIA\_Support\_121411.pdf

Date and Time Comment Was Submitted: 2011-12-14 23:15:56

No Duplicates.

## **Comment 76 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Amy  
Last Name: Ehlers  
Email Address: ayeh@novozymes.com  
Affiliation: Novozymes

Subject: Novozymes written statement to CARB - LCFS  
Comment:

Novozymes written statement to California Air Resources Board  
Public Hearing to Consider Amendments to the Low Carbon Fuel  
Standard Regulation  
December 16, 2011

On behalf of Novozymes and its 829 employees across America - from California to North Carolina - we thank you for the opportunity to submit this statement for the record.

We appreciate the dedication of the California Air Resources Board (ARB) and its staff to creating a low carbon future and incentivizing technologies which can realize that low carbon fuel standard (LCFS) future. We share that commitment.

Today, we would like to highlight ARBs open working process and facilitation with regulated parties, supplier industries and other stakeholders. We believe this process has already enhanced the LCFS and should serve as a model for other carbon-limiting legislative and regulatory efforts.

Novozymes  
Novozymes is a technology and science company; we respect and encourage both. We have more than 5,000 patents and 700 products at work in 130 countries: enzymes that remove trans-fats in food, lower the temperature needed to wash a consumer's clothes - and convert biomass, from switch grass or corn stover, into biofuels. Our technology saves consumers money and protects the environment for our children. California continues to lead the nation in environmental stewardship and, at our research facility in Davis, we are proud to continue that stewardship with cutting-edge research.

Like ARB, we imagine a world where everyday products are made with organic materials instead of oil, creating a lower carbon society:

- Transportation fuels made from agricultural and forestry waste and non-food energy crops, with greenhouse gas emission reductions up to 90 percent of their fossil fuel counter parts
- Detergents that clean thoroughly in cold water, reducing energy consumption, consumer spending and water pollution
- Plastics and polymers based on renewable biomass - not petroleum
- Renewable chemicals that are less harsh to the environment
- Food crops that require less fertilizer and water, yet produce higher per-acre yields

- Animal feed that promotes greater nutrient absorption, and reduce harmful by-products in animal waste

#### Technology Readiness

Biofuels are the only currently available option which notably limits CO2 emissions in transport in commercial quantities. That gives them a central role in the world's future, sustainable energy mix.

The industry is constantly improving technologies and processes, delivering increasingly green and sustainable energy. But as an indication of the technology readiness of the domestic advanced biofuels industry, Novozymes is nearing completion of a state-of-the-art enzyme manufacturing plant in the Midwest, a \$200 million investment in America's future. Our Blair, Nebraska enzyme facility has already created 140 construction jobs and will bring 100 permanent jobs when it opens in 2012. In fact, 45 full-time employees are already at work. These are good-paying, sustainable jobs for families creating sustainable energy for our country. Advanced biofuels projects can replicate this type of local economic development all over America, including California.

We believe private industry drives America's economy. However, we also believe a strong partnership is vital to the success of any emerging industry, where the private sector provides the innovation and lion's share of capital to develop it - and the public sector provides consistent policy support to grow it. This is just one reason why we are heavily invested in the creation, administration and adoption of the California LCFS.

#### Sustainability

Novozymes is committed to sustainable business and recognizes the importance of sustainable development for society to meet future needs while minimizing impacts on our environment. Sustainability is rooted in our company values and expressed in our ambition to "drive the world toward sustainability with our customers." Measurement and innovation are key aspects of success. We conduct Life Cycle Assessments on our products to understand their environmental impact and use that understanding to create solutions that help our customers improve the environmental performance of their products and processes. Taking a life cycle perspective also helps us understand global sustainability trends in climate change, pollution and water consumption. We continue to be a science-based voice that advocates for improvement in these and other issues that face our world.

Novozymes also continues to reduce our own environmental footprint.

We have set ambitious goals of increasing our energy efficiency by 50 percent and water use efficiency by 40 percent over our 2005 baseline by 2015. These and other sustainability strategies have garnered numerous third-party recognitions including Gold Class status in the Dow Jones Sustainability Index.

GHG emission reduction for cellulosic biofuels are not yet based on large scale production, but the GHG emission reductions are repeatedly estimated to be between 80 and 110 percent. These results seem to be rather robust, particularly for crop residues. This is because there are no or low indirect land use change impacts and because the lignin co-product ensures that both biofuels and power are produced.

Advanced Biofuels: Many Benefits

We believe the review report from ARB staff should focus on the administration of the LCFS. Nevertheless, we also believe we must address world hunger, and we have continually acted on that belief.

Recently Novozymes made a commitment at the Clinton Global Initiative where, together with environmental venture group CleanStar Ventures, we established an integrated food-energy business in Mozambique, which is one of the countries pointed out in the new report from FAO on food insecurity.

The project will create incentives for rural Mozambicans to plant and maintain trees and grow crops, including cassava -- a starchy root -- for biofuels. It will also replace thousands of charcoal-burning cookstoves with cleaner ethanol stoves. Agriculture in the developing world holds an enormous potential. Through this partnership, local communities in Africa will be able to produce more food and energy while at the same time improving their health, restoring forests, cleaning the air, and growing the economy. We work with smallholder farmers to implement sustainable farming practices, create a food and ethanol cooking fuel production facility, and lay the groundwork for economically and ecologically sustainable communities in Sub-Saharan Africa.

Just last month, Bank of America Merrill Lynch signed an agreement to generate carbon credits for every metric ton of carbon dioxide that is avoided from displacing charcoal used in cookstoves. The upfront carbon finance obtained from voluntary carbon markets will go to purchase and maintain cookstoves.

Despite uncertainty in alternative energy policy, and an oil and gas industry that is able to count on long term favorable incentives and policies, the biofuels industry has accomplished significant advancements and innovations. If we have been able to achieve so much in so short a time with these uncertainties, imagine what we could do with more stability.

The technology is here and with continued public support, we can continue to provide viable, innovative solutions.

We thank ARB and its staff for its diligent work establishing and administering the LCFS. We look forward to working with CARB as California's LCFS continues to be evaluated and implemented and continue to be available as a resource as you move forward.

Attachment: [www.arb.ca.gov/lists/lcfs2011/109-novozymes\\_comments\\_to\\_carb\\_2011\\_dec15-16mtg\\_lcfs\\_amendments\\_final.pdf](http://www.arb.ca.gov/lists/lcfs2011/109-novozymes_comments_to_carb_2011_dec15-16mtg_lcfs_amendments_final.pdf)

Original File Name: Novozymes Comments to CARB\_2011\_Dec15-16mtg\_LCFS Amendments\_Final.pdf

Date and Time Comment Was Submitted: 2011-12-15 04:51:36

No Duplicates.

**Comment 77 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Kurt  
Last Name: Blase  
Email Address: kurt.blase@hklaw.com  
Affiliation:

Subject: CNAES Comments on LCFS Proposal  
Comment:

Attached for filing are the comments of the Center for North American Energy Security (CNAES) on the proposed changes to the low carbon fuel standard. Please direct questions or comments to the Center staff listed in the comments. Thank you for your assistance.

Attachment: [www.arb.ca.gov/lists/lcfs2011/110-comments\\_on\\_ca\\_lcfs\\_proposal\\_\\_12-15-11\\_.pdf](http://www.arb.ca.gov/lists/lcfs2011/110-comments_on_ca_lcfs_proposal__12-15-11_.pdf)

Original File Name: Comments on CA LCFS Proposal (12-15-11).pdf

Date and Time Comment Was Submitted: 2011-12-15 06:04:35

No Duplicates.

**Comment 78 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Carol Lee  
Last Name: Rawn  
Email Address: rawn@ceres.org  
Affiliation: Ceres

Subject: BICEP comments on CA LCFS  
Comment:

I have attached comments in favor of a strong LCFS from Business in Favor of Climate and Energy Policy (BICEP). Thank you  
Carol Lee Rawn  
Ceres

Attachment: [www.arb.ca.gov/lists/lcfs2011/111-bicep\\_ca\\_lcfs\\_12-15-11.pdf](http://www.arb.ca.gov/lists/lcfs2011/111-bicep_ca_lcfs_12-15-11.pdf)

Original File Name: BICEP CA LCFS 12-15-11.pdf

Date and Time Comment Was Submitted: 2011-12-15 08:05:08

No Duplicates.



## **Comment 79 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Jim  
Last Name: Stewart  
Email Address: Jim@EarthDayLA.org  
Affiliation: Earth Day Los Angeles

Subject: Correct the LCFS GREET to account for fugitive natural gas emissions  
Comment:

Correct the LCFS GREET to account for fugitive natural gas emissions

The GREET standards used for the LCFS do not correctly account for fugitive natural gas emissions and other GHG emissions.

1. CARB still uses a methane carbon intensity of 25 times CO<sub>2</sub>, instead of the latest science saying it is 34 over 100 years or 105 over the next crucial 20 years, as shown in the paper by Drew T. Shindell, et al., "Improved Attribution of Climate Forcing to Emissions," Science 326, 716 (2009). (attached) When will CARB use the latest science?

2. The latest science says that methane produced by fracking has more fugitive emissions than conventional natural gas, which should be included in any LCFS for methane produced by fracking. The paper by Howarth, et al., says fracking "methane emissions are at least 30% more than and perhaps more than twice as great as those from conventional gas..) See attached paper, "Methane and the greenhouse-gas footprint of natural gas from shale formations," Climatic Change (2011) 106:679-690, downloadable from: DOI 10.1007/s10584-011-0061-5

3. GHG emissions from aged natural gas engines are considerably more than new engines, and should be included in the calculations. The paper by Melendez, et al., indicates in Fig. 14 on p. 22 that older natural gas engines could emit as much as 50% more emissions than new buses. See attached paper, "Emission Testing of Washington Metropolitan Area Transit Authority (WMATA) Natural Gas and Diesel Transit Buses," downloadable from:  
<http://www.afdc.energy.gov/afdc/pdfs/36355.pdf>

4. CARB has failed to account for even the EPA acknowledged 75% fugitive emissions related to methane from landfills (and it is probably more than 75% over the full life of a landfill), as compared to methane from contained anaerobic digesters of waste with 0 % fugitive emissions. See attached paper by Jim R. Stewart, "Landfill Gas-to-Energy Projects May Release More Greenhouse Gases Than Flaring,"

Attachment: [www.arb.ca.gov/lists/lcfs2011/112-archive.zip](http://www.arb.ca.gov/lists/lcfs2011/112-archive.zip)

Original File Name: Archive.zip

Date and Time Comment Was Submitted: 2011-12-15 08:13:49

No Duplicates.

**Comment 80 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: H. Daniel

Last Name: Sinks

Email Address: h.daniel.sinks@conocophillips.com

Affiliation: ConocoPhillips

Subject: LCFS Rule Amendments - COP Comments

Comment:

Thank you for the opportunity to comment. Attached are ConocoPhillips' comments regarding this rulemaking.

Attachment: [www.arb.ca.gov/lists/lcfs2011/113-cop\\_comments\\_on\\_lcfs\\_\\_12\\_15\\_11\\_.pdf](http://www.arb.ca.gov/lists/lcfs2011/113-cop_comments_on_lcfs__12_15_11_.pdf)

Original File Name: COP Comments on LCFS \_12\_15\_11\_.pdf

Date and Time Comment Was Submitted: 2011-12-15 08:53:44

No Duplicates.

**Comment 81 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Sam  
Last Name: Leavitt  
Email Address: samuel.leavitt@gmail.com  
Affiliation:

Subject: Compliance Schedule, Credit Market, Harmonization, WSPA Response  
Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/lcfs2011/114-lcfs\\_comments\\_r\\_power\\_biofuels\\_121511.doc](http://www.arb.ca.gov/lists/lcfs2011/114-lcfs_comments_r_power_biofuels_121511.doc)

Original File Name: LFCS comments R Power Biofuels 121511.doc

Date and Time Comment Was Submitted: 2011-12-15 09:12:21

No Duplicates.

**Comment 82 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Don  
Last Name: Karner  
Email Address: dkarner@ecotality.com  
Affiliation:

Subject: Testimony and Attachments for Public Hearing to Consider Amendments to LCFS Regulation  
Comment:

In Support of LCFS Regulation for Parties of Electricity with Amendments

Attachment: [www.arb.ca.gov/lists/lcfs2011/115-final\\_-\\_carb\\_board\\_karner\\_testimony\\_\\_coalition\\_position\\_recommendations\\_and\\_attachments.zip](http://www.arb.ca.gov/lists/lcfs2011/115-final_-_carb_board_karner_testimony__coalition_position_recommendations_and_attachments.zip)

Original File Name: FINAL - CARB Board Karner Testimony, Coalition Position Recommendations and Attachments.zip

Date and Time Comment Was Submitted: 2011-12-15 08:41:51

No Duplicates.

**Comment 83 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Carol Lee  
Last Name: Rawn  
Email Address: rawn@ceres.org  
Affiliation: Ceres

Subject: INCR comment letter supporting strong CA CLFS  
Comment:

Attached please find a letter from the Investor Network on Climate Risk supporting a strong LCFS in CA. Thank you  
Carol Lee Rawn

Attachment: [www.arb.ca.gov/lists/lcfs2011/116-incr\\_ca\\_lcfs\\_letter.pdf](http://www.arb.ca.gov/lists/lcfs2011/116-incr_ca_lcfs_letter.pdf)

Original File Name: INCR CA LCFS letter.pdf

Date and Time Comment Was Submitted: 2011-12-15 09:33:00

No Duplicates.

**Comment 84 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Melinda

Last Name: Hicks

Email Address: mhicks@kernoil.com

Affiliation: Kern Oil & Refining Co.

Subject: Comments on Proposed Amendments to LCFS Regulation

Comment:

Please reference attached letter from Kern Oil & Refining Co. containing our particular comments as relate to Agenda Item 11-10-2, Amendments to the LCFS Regulation.

Attachment: [www.arb.ca.gov/lists/lcfs2011/117-kern\\_lcfs\\_comment\\_letter\\_12-15-11.pdf](http://www.arb.ca.gov/lists/lcfs2011/117-kern_lcfs_comment_letter_12-15-11.pdf)

Original File Name: Kern LCFS Comment Letter 12-15-11.pdf

Date and Time Comment Was Submitted: 2011-12-15 09:42:17

No Duplicates.

**Comment 85 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Bill

Last Name: Haskins

Email Address: center@biologicaldiversity.org

Affiliation:

Subject: Please uphold and protect California's low-carbon fuel standard

Comment:

The attached comments are submitted on behalf of supporters of the  
Center for Biological Diversity

Attachment: [www.arb.ca.gov/lists/lcfs2011/118-cbd\\_comments\\_lcfs2011.pdf](http://www.arb.ca.gov/lists/lcfs2011/118-cbd_comments_lcfs2011.pdf)

Original File Name: CBD\_Comments\_lcfs2011.pdf

Date and Time Comment Was Submitted: 2011-12-15 10:05:26

5041 Duplicates.



**Comment 86 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Cathy  
Last Name: Reheis-Boyd  
Email Address: cathy@wspa.org  
Affiliation:

Subject: WSPA Comments on Board Hearing Item 11-10-2 - LCFS Regulatory Amendments  
Comment:

Board Secretary: Per my voicemail today, please replace the WSPA comment letter from late yesterday with this attached zipped file. Thank you.

Attachment: [www.arb.ca.gov/lists/lcfs2011/119-wspa\\_lcfs\\_comments2.zip](http://www.arb.ca.gov/lists/lcfs2011/119-wspa_lcfs_comments2.zip)

Original File Name: WSPA LCFS Comments2.zip

Date and Time Comment Was Submitted: 2011-12-15 10:19:36

No Duplicates.

**Comment 87 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: June

Last Name: Christman

Email Address: jchristman@ppcla.com

Affiliation: Paramount Petroleum Corporation

Subject: Paramount Petroleum's Comments on Proposed Amendments to LCFS

Comment:

Please see the attached letter summarizing Paramount's comments to the proposed amendments to LCFS regs.

Attachment: [www.arb.ca.gov/lists/lcfs2011/120-lcfs\\_11-15-2011\\_comments.pdf](http://www.arb.ca.gov/lists/lcfs2011/120-lcfs_11-15-2011_comments.pdf)

Original File Name: LCFS 11-15-2011 Comments.pdf

Date and Time Comment Was Submitted: 2011-12-15 10:14:25

No Duplicates.

**Comment 88 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: John  
Last Name: Reese  
Email Address: John.Reese@Shell.com  
Affiliation: Shell Oil Products US

Subject: Agenda Items 11-10-1 and 11-10-2  
Comment:

Please find attached comments pertaining to Agenda items 11-10-1 and 11-10-2.

Attachment: [www.arb.ca.gov/lists/lcfs2011/121-sopus\\_lcfs\\_comments\\_december\\_15\\_2011.pdf](http://www.arb.ca.gov/lists/lcfs2011/121-sopus_lcfs_comments_december_15_2011.pdf)

Original File Name: SOPUS lcfs comments december 15 2011.pdf

Date and Time Comment Was Submitted: 2011-12-15 10:32:36

No Duplicates.

**Comment 89 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Brian

Last Name: Nowicki

Email Address: [bnowicki@biologicaldiversity.org](mailto:bnowicki@biologicaldiversity.org)

Affiliation: Center for Biological Diversity

Subject: Comments of the Center for Biological Diversity

Comment:

The Center for Biological Diversity strongly supports the Low Carbon Fuel Standard. We urge the Board to strengthen the Proposed Amendments, and to reject proposals by the oil industry that would weaken the LCFS and exempt dirty, high-carbon fuels.

Attachment: [www.arb.ca.gov/lists/lcfs2011/122-cbd\\_comments\\_to\\_proposed\\_amends\\_to\\_lcfs\\_12\\_15\\_11.pdf](http://www.arb.ca.gov/lists/lcfs2011/122-cbd_comments_to_proposed_amends_to_lcfs_12_15_11.pdf)

Original File Name: CBD comments to proposed amends to LCFS 12 15 11.pdf

Date and Time Comment Was Submitted: 2011-12-15 10:39:35

No Duplicates.

**Comment 90 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Alfred  
Last Name: Padula  
Email Address: alpadula@aol.com  
Affiliation:

Subject: Oil Industry Greenwash  
Comment:

Dear Carb,

Small states like Maine depend on California to lead the way towards cleaner air and a more sustainable planet.

It's very important that CARB deflate oil company claims that they are making substantial investments in renewables, when in fact--according to the NRDC---they are not.

Sincerely,

Alfred Padula  
DownEast

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-15 11:22:02

No Duplicates.

**Comment 91 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: David  
Last Name: Chase  
Email Address: dchase@smallbusinessmajority.org  
Affiliation: Small Business Majority

Subject: Letter from Small Business Majority re: LCFS  
Comment:

Hello,

Please find the attached letter from Small Business Majority Founder and CEO John Arensmeyer about the importance of a strong LCFS.

If you have any questions, I am available at 916-479-1045.

Thank you.

---

David Chase  
California Outreach Director  
Small Business Majority  
921 11th Street, Suite 901  
Sacramento, California 95814  
(916) 479-1045  
DChase@SmallBusinessMajority.org  
www.SmallBusinessMajority.org

Attachment: [www.arb.ca.gov/lists/lcfs2011/127-sbm\\_letter\\_-\\_chairman\\_mary\\_nichols\\_-\\_lcfs\\_-\\_12.14.11.pdf](http://www.arb.ca.gov/lists/lcfs2011/127-sbm_letter_-_chairman_mary_nichols_-_lcfs_-_12.14.11.pdf)

Original File Name: SBM Letter - Chairman Mary Nichols - LCFS - 12.14.11.pdf

Date and Time Comment Was Submitted: 2011-12-15 11:45:14

No Duplicates.

## **Comment 92 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Todd  
Last Name: Campbell  
Email Address: tcampbell@cleanenergyfuels.com  
Affiliation: Clean Energy

Subject: Clean Energy supports ARB staff's proposed LCFS Amendments  
Comment:

December 15, 2011

Mary D. Nichols, Chair  
Members of the Governing Board  
California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

RE: Clean Energy strongly supports the proposed Amendments to the Low Carbon Fuel Standard Regulation as presented by staff.

Dear Chairman Nichols and Members of the Air Resources Board,

Clean Energy is in strong support of the proposed amendments to the Low Carbon Fuel Standard (LCFS) Regulation before the Governing Board. It is our belief that staff has carefully reviewed the program's progress through this initial year and has determined that not only is the program solvent for compliance purposes, but that low carbon fuel production is continuing to ramp up to meet the needs of regulated parties to achieve the standard's 2020 low carbon fuel reduction goal of 10 percent.

Clean Energy staff has worked very closely with Air Resources Board (ARB) staff over the past few years to address a number of the Natural Gas Vehicle Industry's concerns pertaining to the initial rulemaking. These concerns dealt with the original Energy Efficiency Ratio applied to medium- and heavy-duty natural gas vehicles, fuel quality concerns for mobile applications for territories covered by Southern California Gas Company and San Diego Gas & Electric utilities, and the ability for renewable natural gas fuel providers to deliver this ultra low carbon product to the California market in an efficient and enforceable manner. Further, Clean Energy was an active participant of the LCFS Advisory Committee and would like to commend the leadership of Mr. Richard Corey and his staff for professionally addressing many stakeholders concerns by providing reasonable and well thought out solutions that make the LCFS regulation functional.

Clean Energy was proud to make up nearly nine percent of the LCFS credit market for the first quarter of 2011. As we start to deploy our American Natural Gas Highway in 2012 and ramp up our production of renewable natural gas (also known as biomethane) through our

subsidiary, Clean Energy Renewable Fuels, we hope to demonstrate to this agency that natural gas, conventional and renewable, can and will provide a meaningful low carbon fuel solution to the transportation sector for decades to come. Thank you.

Sincerely,

Todd R. Campbell

Attachment: [www.arb.ca.gov/lists/lcfs2011/129-clne\\_ltr\\_of\\_support\\_for\\_arb\\_staff\\_proposed\\_lcfs\\_amendments\\_12.15.11.pdf](http://www.arb.ca.gov/lists/lcfs2011/129-clne_ltr_of_support_for_arb_staff_proposed_lcfs_amendments_12.15.11.pdf)

Original File Name: CLNE Ltr of support for ARB Staff proposed LCFS Amendments 12.15.11.pdf

Date and Time Comment Was Submitted: 2011-12-15 11:57:52

No Duplicates.



**Comment 93 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Brooke

Last Name: Coleman

Email Address: bcoleman@advancedethanol.org

Affiliation: Advanced Ethanol Council

Subject: LCFS Comments

Comment:

Please accept for submission, from the Advanced Ethanol Council, public comments related to the proposed amendments to the LCFS regulation.

Attachment: [www.arb.ca.gov/lists/lcfs2011/130-aec\\_lcfs\\_letter\\_final.pdf](http://www.arb.ca.gov/lists/lcfs2011/130-aec_lcfs_letter_final.pdf)

Original File Name: AEC\_LCFS letter\_final.pdf

Date and Time Comment Was Submitted: 2011-12-15 11:52:05

No Duplicates.

## **Comment 94 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Jeremy  
Last Name: Bautista  
Email Address: jbautista@rcpfuel.com  
Affiliation:

Subject: Request to Postpone LCFS  
Comment:

On behalf of River City Petroleum, we represent our concerns regarding the Low Carbon Fuel Standards set to be implemented in January for the upcoming year. After reading, analyzing and speaking with peers in the industry, it is apparent numerous unanswered questions remain regarding the regulation. Will the costs of the implementation truly outweigh its benefits? It is apparent that it will cost a significant amount of money to achieve the stated goals as the standard is currently laid out. What is troublesome is that a definitive answer as to what is to be accomplished has yet to be answered. Whatever it is, the costs will ultimately be passed on to consumers. How much of an increase will they pay at the pump? Is it realistic to expect consumers to pay these increases with the current economy in such an unstable state? Accompanying our concern for costs; how it is expected the supply of "low carbon" fuel to be sustainable, especially if other states are expected to implement similar programs. The LCFS bill makes clear the methods for finding the Carbon Intensity are imperfect and "subject to change" based on new findings. This instills very little confidence in the program, when there are many questions left unanswered. River City Petroleum therefore requests the implementation of the Low Carbon Fuel Standard be postponed until all costs and benefits of the program are weighed out and a more accurate measurement of them are able to be derived.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-15 12:05:36

No Duplicates.

**Comment 95 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Eileen

Last Name: Tutt

Email Address: Eileen@caletc.com

Affiliation:

Subject: California Electric Transportation Coalition

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/132-eileen.pdf](http://www.arb.ca.gov/lists/lcfs2011/132-eileen.pdf)

Original File Name: Eileen.pdf

Date and Time Comment Was Submitted: 2011-12-19 09:15:53

No Duplicates.

**Comment 96 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: Kim  
Last Name: Folkins  
Email Address: kim.folkins@capp.ca  
Affiliation:

Subject: Canadian Association of Petroleum Producers  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/139-capp\\_letter\\_to\\_carb.pdf](http://www.arb.ca.gov/lists/lcfs2011/139-capp_letter_to_carb.pdf)

Original File Name: CAPP Letter\_to\_CARB.pdf

Date and Time Comment Was Submitted: 2011-12-21 12:41:27

No Duplicates.

**Comment 97 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Roger  
Last Name: Potash  
Email Address: rogerpotash@earthlink.net  
Affiliation: retired engineer

Subject: Clean Fuels  
Comment:

Dear CARB members,

I read with interest the S.F. Chronicle editorial this morning regarding your upcoming meeting tomorrow to consider amendments relaxing the Low Carbon Fuel Standards. I am writing to ask that the Board reject the oil industries requests to annually review these standards in light of progress in their reductions of greenhouse gas emissions from burning fossil fuels.

This is the time to stand firm behind these standards. Our state is a leader, nationally and internationally, in recognizing the need to take mitigating actions to move our economy to less polluting sources of fuels in order to avoid major climate change impacts to our society. We have seen in our recent history that establishing standards for change, and holding firm to these standards, creates the incentive and persuasion needed to establish new products to meet the tougher standards. We saw this with the automobile industry response to mileage standards: hold firm to the standard and the performance will come along, in fits and starts, with much objection and push back by the industry. Look at the progress the Western European countries have made in this regard, where gasoline is priced and taxed high enough to lead to small, efficient cars, less pollution, more public transit, etc. Certainly we can do as well in the United States, and even better here in California.

Thank you for considering my comments.  
Roger Potash

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-28 13:34:35

No Duplicates.

**Comment 98 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Tom  
Last Name: Crosser  
Email Address: crosser.tom@gmail.com  
Affiliation:

Subject: Low Carbon Fuel Standard-proposed amendments  
Comment:

Please do not adopt any amendments that would weaken California's Low Carbon Fuel Standard. Growing evidence suggests that human caused climate change is happening much faster than previously predicted with potentially devastating consequences for the future.

Industry will not make the necessary changes in energy practices without solid mandates such as the Low Carbon Fuel Standard. Please maintain California's leadership in the fight against climate change by leaving the Low Carbon Fuel Standard intact and even strengthening it where possible.

Thank you.

Tom Crosser

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-28 13:34:35

No Duplicates.

**Comment 99 for Amendments to the Low Carbon Fuel Standard (lcfs2011) -  
45 Day.**

First Name: David  
Last Name: Calvo  
Email Address: dcalvoman@gmail.com  
Affiliation: Calvo Associates

Subject: Air Quality Standards  
Comment:

We would like to encourage you to continue to uphold the standards  
you have already established and have in place at the moment.  
Do NOT ALLOW the standards to be weakened by the Industries that  
have to comply.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-28 13:34:35

No Duplicates.

**Comment 100 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 45 Day.**

First Name: Emmanuel  
Last Name: Martinez  
Email Address: mtzeman006@gmail.com  
Affiliation:

Subject: Oil Industry Proposed Regulation Changes  
Comment:

Dont let the oil industry disinvest in clean energy goals. We need to create a market that allows for the investment in clean technologies. Please keep pressure on the oil industry to do the right thing for public health, climate and the well-being of future generations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-28 13:34:35

No Duplicates.



**Comment 1 for Amendments to the Low Carbon Fuel Standard (lcfs2011).  
(At Hearing)**

First Name: Ron  
Last Name: Chapman  
Email Address: Non-web submitted comment  
Affiliation:

Subject: Weaver, LLP  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/133-ron\\_chapman.pdf](http://www.arb.ca.gov/lists/lcfs2011/133-ron_chapman.pdf)

Original File Name: Ron Chapman.pdf

Date and Time Comment Was Submitted: 2011-12-19 15:51:39

No Duplicates.

**Comment 2 for Amendments to the Low Carbon Fuel Standard (lcfs2011).  
(At Hearing)**

First Name: Cassie

Last Name: Doyle

Email Address: Non-web submitted comment

Affiliation:

Subject: Consulate General Canada

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/134-cassie\\_doyle.pdf](http://www.arb.ca.gov/lists/lcfs2011/134-cassie_doyle.pdf)

Original File Name: Cassie Doyle.pdf

Date and Time Comment Was Submitted: 2011-12-19 15:51:39

No Duplicates.

**Comment 3 for Amendments to the Low Carbon Fuel Standard (lcfs2011).  
(At Hearing)**

First Name: Chris  
Last Name: Carney  
Email Address: CCarney@ucsusa.org  
Affiliation:

Subject: Union of Concerned Scientist  
Comment:

Please see attached.

Along with attached is a CD of 363 letters. To see a copy of the CD please see the Air Resources Board's Clerk of the Board.

Attachment: [www.arb.ca.gov/lists/lcfs2011/135-chris\\_carney.pdf](http://www.arb.ca.gov/lists/lcfs2011/135-chris_carney.pdf)

Original File Name: Chris Carney.pdf

Date and Time Comment Was Submitted: 2011-12-19 15:51:39

No Duplicates.

**Comment 4 for Amendments to the Low Carbon Fuel Standard (lcfs2011).  
(At Hearing)**

First Name: Norm

Last Name: Plotkin

Email Address: Non-web submitted comment

Affiliation:

Subject: California Independent Petroleum Association

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/136-norm\\_plotkin.pdf](http://www.arb.ca.gov/lists/lcfs2011/136-norm_plotkin.pdf)

Original File Name: Norm Plotkin.pdf

Date and Time Comment Was Submitted: 2011-12-19 15:51:39

No Duplicates.

**Comment 5 for Amendments to the Low Carbon Fuel Standard (lcfs2011).  
(At Hearing)**

First Name: Eric  
Last Name: Eisenhammer  
Email Address: eric@coalitionofenergyusers.org  
Affiliation:

Subject: Coalition of Energy Users  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/137-eric\\_eisenhammer.pdf](http://www.arb.ca.gov/lists/lcfs2011/137-eric_eisenhammer.pdf)

Original File Name: Eric Eisenhammer.pdf

Date and Time Comment Was Submitted: 2011-12-19 15:51:39

No Duplicates.

**Comment 6 for Amendments to the Low Carbon Fuel Standard (lcfs2011).  
(At Hearing)**

First Name: Lisa  
Last Name: Hoyos  
Email Address: lisah@bluegreenalliance.org  
Affiliation:

Subject: Blue-Green Alliance  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/138-lisa\\_hoyos.pdf](http://www.arb.ca.gov/lists/lcfs2011/138-lisa_hoyos.pdf)

Original File Name: Lisa Hoyos.pdf

Date and Time Comment Was Submitted: 2011-12-19 15:51:39

No Duplicates.

**Comment 1 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-1.**

First Name: Lily  
Last Name: Mitchell  
Email Address: l Mitchell@hanmor.com  
Affiliation: SCPPA

Subject: SCPPA comments on changes to Low Carbon Fuel Standard Regulation  
Comment:

Please find attached the comments of the Southern California Public Power Authority on the April 10, 2012 proposed changes to the Low Carbon Fuel Standard regulation.

Attachment: [www.arb.ca.gov/lists/lcfs2011/145-300226001lmm04251201\\_scppa\\_comment\\_to\\_arb\\_on\\_lcfs\\_reg\\_15-day\\_changes.pdf](http://www.arb.ca.gov/lists/lcfs2011/145-300226001lmm04251201_scppa_comment_to_arb_on_lcfs_reg_15-day_changes.pdf)

Original File Name: 300226001lmm04251201 SCPPA comment to ARB on LCFS Reg 15-day changes.pdf

Date and Time Comment Was Submitted: 2012-04-25 15:04:27

No Duplicates.

**Comment 2 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-1.**

First Name: Cathy  
Last Name: Reheis-Boyd  
Email Address: cathy@wspa.org  
Affiliation:

Subject: WSPA Comments on LCFS 15 Day Package  
Comment:

Please find attached WSPA's comment letter on the LCFS 15 day package.

Attachment: [www.arb.ca.gov/lists/lcfs2011/146-wspa\\_comments\\_arb\\_april\\_15\\_day\\_lcfs\\_modification\\_package\\_doc\\_\\_finalx\\_.pdf](http://www.arb.ca.gov/lists/lcfs2011/146-wspa_comments_arb_april_15_day_lcfs_modification_package_doc__finalx_.pdf)

Original File Name: WSPA Comments ARB April 15 Day LCFS Modification Package DOC (finalx).pdf

Date and Time Comment Was Submitted: 2012-04-25 15:09:32

No Duplicates.



**Comment 3 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-1.**

First Name: Nancy  
Last Name: Allred  
Email Address: nancy.allred@sce.com  
Affiliation: Southern California Edison Company

Subject: Comments of SCE on the LCFS 15-Day Modifications  
Comment:

Please see attached comments of Southern California Edison Company on the LCFS Modified Regulation Order.

Attachment: [www.arb.ca.gov/lists/lcfs2011/147-2012-04-25\\_comments\\_to\\_carb\\_on\\_lcfs\\_15-day\\_amendments.pdf](http://www.arb.ca.gov/lists/lcfs2011/147-2012-04-25_comments_to_carb_on_lcfs_15-day_amendments.pdf)

Original File Name: 2012-04-25 Comments to CARB on LCFS 15-Day Amendments.pdf

Date and Time Comment Was Submitted: 2012-04-25 15:56:14

No Duplicates.

**Comment 4 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-1.**

First Name: Melinda  
Last Name: Hicks  
Email Address: mhicks@kernoil.com  
Affiliation: Kern Oil & Refining Co.

Subject: Modified Text re: Reporting Obligations  
Comment:

Attached are comments presented on behalf of Kern Oil & Refining Co. Thank you for the opportunity.

Attachment: [www.arb.ca.gov/lists/lcfs2011/148-kern\\_lcfs\\_hcico\\_mcon\\_comments\\_04-25-2012.pdf](http://www.arb.ca.gov/lists/lcfs2011/148-kern_lcfs_hcico_mcon_comments_04-25-2012.pdf)

Original File Name: Kern LCFS HCICO MCON Comments 04-25-2012.pdf

Date and Time Comment Was Submitted: 2012-04-25 15:39:54

No Duplicates.

**Comment 5 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-1.**

First Name: Meg  
Last Name: Meal  
Email Address: MMeal@SFWater.org  
Affiliation: SFPUC

Subject: SFPUC and SFMTA Comments Regarding Staff Report on LCFS Modified Regulation Order

Comment:

Please see attachment for our comments.

Attachment: [www.arb.ca.gov/lists/lcfs2011/149-sfpuc\\_and\\_sfmta\\_comments\\_on\\_lcfs\\_modified\\_regulation\\_order\\_\\_4-25-12.pdf](http://www.arb.ca.gov/lists/lcfs2011/149-sfpuc_and_sfmta_comments_on_lcfs_modified_regulation_order__4-25-12.pdf)

Original File Name: SFPUC and SFMTA Comments on LCFS Modified Regulation Order, 4-25-12.pdf

Date and Time Comment Was Submitted: 2012-04-25 15:58:01

No Duplicates.

**Comment 1 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-2.**

First Name: Melinda  
Last Name: Hicks  
Email Address: mhicks@kernoil.com  
Affiliation: Kern Oil & Refining Co.

Subject: Comments on Proposed Amendments to LCFS - Second Notice  
Comment:

Kern Oil & Refining Co. respectfully submits comments by means of the attached file, "Kern LCFS Comments August 24 2012 FINAL.pdf"

Kern appreciates the opportunity to provide comments and respectfully requests the points made be taken into consideration.

Thank you.

Attachment: [www.arb.ca.gov/lists/lcfs2011/150-kern\\_lcfs\\_comments\\_august\\_24\\_2012\\_final.pdf](http://www.arb.ca.gov/lists/lcfs2011/150-kern_lcfs_comments_august_24_2012_final.pdf)

Original File Name: Kern LCFS Comments August 24 2012 FINAL.pdf

Date and Time Comment Was Submitted: 2012-08-24 16:22:24

No Duplicates.

**Comment 2 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-2.**

First Name: Catherine

Last Name: Boyd

Email Address: Non-web submitted comment

Affiliation:

Subject: : WSPA Comments on LCFS Second 15 Day Package

Comment:

see attached

Attachment: [www.arb.ca.gov/lists/lcfs2011/151-wspa\\_comments\\_on\\_2nd\\_15\\_day\\_pkg\\_lcfs\\_812final.pdf](http://www.arb.ca.gov/lists/lcfs2011/151-wspa_comments_on_2nd_15_day_pkg_lcfs_812final.pdf)

Original File Name: WSPA comments on 2nd 15 day pkg LCFS 812final.pdf

Date and Time Comment Was Submitted: 2012-08-29 09:28:35

No Duplicates.

**Comment 1 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-3.**

First Name: Cathy  
Last Name: Reheis-Boyd  
Email Address: cathy@wspa.org  
Affiliation:

Subject: WSPA Comments on 3rd 15 Day LCFS Package  
Comment:

Please find attached WSPA's comment letter on the 3rd 15 day package amendments.

Attachment: [www.arb.ca.gov/lists/lcfs2011/152-wspa\\_comments\\_on\\_lcfs\\_3rd\\_15\\_day\\_package\\_912final.pdf](http://www.arb.ca.gov/lists/lcfs2011/152-wspa_comments_on_lcfs_3rd_15_day_package_912final.pdf)

Original File Name: WSPA comments on LCFS 3rd 15 day package 912final.pdf

Date and Time Comment Was Submitted: 2012-10-01 11:20:46

No Duplicates.

**Comment 2 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-3.**

First Name: Robert  
Last Name: Nelson  
Email Address: robert.e.nelson@shell.com  
Affiliation: Shell Oil Products US

Subject: Comments on LCFS Third 15 Day Package  
Comment:

Attached are Shell's comments on the Third 15 Day Package for proposed ammendments to the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/lcfs2011/153-shell\\_comments\\_to\\_arb\\_3rd\\_15\\_day\\_package\\_lcfs\\_10-1-2012\\_\\_final\\_.pdf](http://www.arb.ca.gov/lists/lcfs2011/153-shell_comments_to_arb_3rd_15_day_package_lcfs_10-1-2012__final_.pdf)

Original File Name: Shell Comments to ARB 3rd 15 day package LCFS 10-1-2012 (FINAL).pdf

Date and Time Comment Was Submitted: 2012-10-01 13:26:00

No Duplicates.

**Comment 3 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-3.**

First Name: Ralph  
Last Name: Moran  
Email Address: moranj1@bp.com  
Affiliation: BP America

Subject: BP Comments on LCFS 3rd 15-day package  
Comment:

v

Attachment: [www.arb.ca.gov/lists/lcfs2011/154-bp\\_comments\\_on\\_lcfs\\_3rd\\_15\\_day\\_package\\_10\\_12.pdf](http://www.arb.ca.gov/lists/lcfs2011/154-bp_comments_on_lcfs_3rd_15_day_package_10_12.pdf)

Original File Name: BP comments on LCFS 3rd 15 day package 10 12.pdf

Date and Time Comment Was Submitted: 2012-10-02 10:42:42

No Duplicates.



**Comment 4 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-3.**

First Name: Jessica  
Last Name: Wiechman  
Email Address: [jwiechman@rpmgllc.com](mailto:jwiechman@rpmgllc.com)  
Affiliation: RPMG, Inc.

Subject: RPMG LCFS Comments  
Comment:

Comments provided in pdf attachment. Thank you.

Attachment: [www.arb.ca.gov/lists/lcfs2011/155-rpmg\\_lcfs\\_comments\\_oct\\_2012.pdf](http://www.arb.ca.gov/lists/lcfs2011/155-rpmg_lcfs_comments_oct_2012.pdf)

Original File Name: RPMG LCFS Comments Oct 2012.pdf

Date and Time Comment Was Submitted: 2012-10-02 11:55:20

No Duplicates.

**Comment 5 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-3.**

First Name: John  
Last Name: O'Donnell  
Email Address: john@glasspoint.com  
Affiliation: GlassPoint Solar, Inc.

Subject: Public Comment Re Third 15-Day Modified Regulation Order  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/lcfs2011/156-gp-lcfs-letter.pdf](http://www.arb.ca.gov/lists/lcfs2011/156-gp-lcfs-letter.pdf)

Original File Name: GP-LCFS-letter.pdf

Date and Time Comment Was Submitted: 2012-10-02 15:41:28

No Duplicates.

**Comment 6 for Amendments to the Low Carbon Fuel Standard (lcfs2011) - 15-3.**

First Name: Melinda

Last Name: Hicks

Email Address: mhicks@kernoil.com

Affiliation: Kern Oil & Refining Co,

Subject: Kern Oil Comments on LCFS Third Notice of Modified Text

Comment:

Kern Oil & Refining Co. appreciates the opportunity to provide the attached comment letter.

Attachment: [www.arb.ca.gov/lists/lcfs2011/157-kern\\_lcfs\\_comments\\_october\\_2\\_2012\\_final.pdf](http://www.arb.ca.gov/lists/lcfs2011/157-kern_lcfs_comments_october_2_2012_final.pdf)

Original File Name: Kern LCFS Comments October 2 2012 FINAL.pdf

Date and Time Comment Was Submitted: 2012-10-02 15:44:24

No Duplicates.