

## **Comment 1 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Tim

Last Name: Carmichael

Email Address: [tim@cngvc.org](mailto:tim@cngvc.org)

Affiliation: California Natural Gas Vehicle Coalition

Subject: Comments on CA-GREET model update for LCFS Reauthorization

Comment:

Please see the attached comments submitted jointly on behalf of the California Natural Gas Vehicle Coalition, NGVAmerica, and the Coalition for Renewable Natural Gas.

Attachment: [www.arb.ca.gov/lists/com-attach/1-lcfs2015-WihVNIQmUXIFbFM9.pdf](http://www.arb.ca.gov/lists/com-attach/1-lcfs2015-WihVNIQmUXIFbFM9.pdf)

Original File Name: Response Letter to Richard Corey January 21 2015\_Final (2).pdf

Date and Time Comment Was Submitted: 2015-01-22 08:48:13

No Duplicates.

## **Comment 2 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Marc

Last Name: Rauch

Email Address: mjrauch@theautochannel.com

Affiliation: The Auto Channel

Subject: Low Carbon Standard

Comment:

If I was to write a kind response to your Low Carbon Standard initiative I would say, "Shucks, looks like you missed the mark again."

The problem with that response is that I would be dishonest. The honest response is to say that once again the California government and it's self-interested appointee organizations is about to level another scam that milks and bilks the working public of its hard-earned income.

If CARB or CALSTART really had any interest in low-carbon fuels; freeing us from foreign oil dependency; and trying to make the environment healthier; they would have long ago mandated the use of the two fuels that are available to do the job. These two fuels are compressed natural gas (CNG) and ethanol. Instead, they continue to favor electric power, a solution that won't be affordable and in meaningful availability for 2, 3, 4, 5 maybe 6 decades from now.

CNG and ethanol is available right now - today - and can be used by the overwhelming majority of passenger vehicles that are currently on the road; and in the case of ethanol, these vehicles would not even require any engine conversions to use the fuel. Starting immediately we could make an enormous reduction in harmful emissions, while saving the public billions of dollars.

Nearly three years ago, to the day, California's Air Resources Board unanimously approved a package of new emissions rules that they claimed would save drivers money, create jobs, and cut smog and greenhouse gases under what was labeled "The Advanced Clean Car Program."

This program only referred to electric. They never talked about the contribution that ethanol and CNG could make. What was particularly ironic was that the report from CARB stated that they relied in part on Ron Cogan and his GREEN CAR JOURNAL to help them make their decision to support their electric car program. But there was a problem with this: they never consulted Ron Cogan, and Mr. Cogan was not in favor of CARB's program. I know this because I discussed it with him at the Los Angeles Auto Show that convened a few months later.

Even more interesting was the fact that just prior to CARB unveiling this program, Mr. Cogan had bestowed (one again) his company's Green Car Of The Year Award on the Honda Civic GX, car powered exclusively by CNG. Honda won this award for virtually the same vehicle just a few years earlier.

In addition, although CNG has received great press in the past couple of years, California continues its refusal to allow existing gasoline-powered passenger vehicles to be converted to CNG. If you purchase a vehicle that was legally converted to CNG in another state, and bring it into California, you can not register the vehicle. CNG conversions are performed everyday around the rest of the world. If there was a danger in doing so, we would be hearing terrible stories about this everyday, rather than the terrible stories we do hear everyday caused by people who are supported by oil dictators.

Moreover, although today's CALSTART article finally does mention CNG, they never said anything about the dearth of available new CNG powered cars. For the past several years only Honda is regularly producing CNG-powered vehicles - that is, if you can describe annual production runs of about 2,000 vehicles to be regular. The auto manufacturers make more electric vehicles per year than that, and that low number is just a totally meaningless. If California (and the EPA) removed their unjustified restrictions on CNG conversions, at least millions of cars could be converted even if there is no increase in the production of new CNG vehicles.

Not only is the number of electric cars being produced meaningless, they are too expensive: for the consumers and for the auto manufacturers. Consumers who purchase an electric car are paying a significant premium over the true value of the car, and auto manufacturers lose thousands of dollars on every electric car they sell. Sergio Marchione, CEO of Chrysler-Fiat says it best: "Our electric Fiat 500 is great, but please don't buy them; we lose too much money."

Added to the cost and availability problems with electric cars is the fact that battery production makes us dependent on China. At present, there's little to suggest that reliance on China is any better than reliance on foreign petroleum oil.

Incidentally, 100% of our CNG and ethanol supply is produced domestically, and none of the ethanol producers are owned by foreign or terrorist controlled regimes. No American serviceman or woman have ever been killed defending the domestic production and distribution of ethanol.

So when CARB, CALSTART, Jerry Brown and the California Legislature say "Let's Keep Going," what they mean is let's keep milking and bilking the working public; let's keep padding our staffs with additional friends, relatives and campaign donors.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-02-03 18:45:42

No Duplicates.

### **Comment 3 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: george

Last Name: sterzinger

Email Address: gsterzinger@gmail.com

Affiliation: american waste to energy

Subject: COMMENTS ON Statement of Reasons for Proposed Rulemaking

Comment:

Please find attached the Comments of American Waste to Energy on the Proposed Rulemaking.

Attachment: [www.arb.ca.gov/lists/com-attach/3-lcfs2015-VzZWJwBkVlpVMAhn.docx](http://www.arb.ca.gov/lists/com-attach/3-lcfs2015-VzZWJwBkVlpVMAhn.docx)

Original File Name: AWE Comments on the LCFS.docx

Date and Time Comment Was Submitted: 2015-02-04 10:41:45

No Duplicates.

## **Comment 4 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Mike

Last Name: Mielke

Email Address: [mmielke@svlg.org](mailto:mmielke@svlg.org)

Affiliation: Silicon Valley Leadership Group

Subject: Support for LCFS

Comment:

Please find attached Silicon Valley Leadership Group's letter of support for the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/4-lcfs2015-AHMGdIA9WGxRCAZq.pdf](http://www.arb.ca.gov/lists/com-attach/4-lcfs2015-AHMGdIA9WGxRCAZq.pdf)

Original File Name: SVLG\_LCFS\_Re-adoption\_Support\_Letter.pdf

Date and Time Comment Was Submitted: 2015-02-10 12:26:19

No Duplicates.

**Comment 5 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Jeremy

Last Name: Martin

Email Address: JMartin@ucsusa.org

Affiliation:

Subject: UCS Comment on LCFS

Comment:

Please see attached ZIP file.

Attachment: [www.arb.ca.gov/lists/com-attach/5-lcfs2015-USQAZQR2V1tQO1Iz.zip](http://www.arb.ca.gov/lists/com-attach/5-lcfs2015-USQAZQR2V1tQO1Iz.zip)

Original File Name: UCS Materials on LCFS.zip

Date and Time Comment Was Submitted: 2015-02-12 10:01:53

No Duplicates.

**Comment 6 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Eileen

Last Name: Tutt

Email Address: eileen@caletc.com

Affiliation: California Electric Transportation Coali

Subject: Low Carbon Fuels Standard re Adoption

Comment:

Please see attached CalETC comments

Attachment: [www.arb.ca.gov/lists/com-attach/6-lcfs2015-WzgGYQZrBzEGdAZl.pdf](http://www.arb.ca.gov/lists/com-attach/6-lcfs2015-WzgGYQZrBzEGdAZl.pdf)

Original File Name: CalETC Comments February CARB Board meeting FINAL (02-13-2015).pdf

Date and Time Comment Was Submitted: 2015-02-13 12:29:36

No Duplicates.

**Comment 7 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Harry  
Last Name: Simpson  
Email Address: [hsimpson@crimsonrenewable.com](mailto:hsimpson@crimsonrenewable.com)  
Affiliation: Crimson Renewable Energy LP

Subject: comments on proposed ADF regulations and LCFS reauthorization  
Comment:

Dear Clerk of the Board,

Pls see attached letter to Chairwoman Mary Nichols with cc: to all other ARB board members and forward to these individuals.

Tks and Rgds  
Harry Simpson  
President  
Crimson Renewable Energy LP

Attachment: [www.arb.ca.gov/lists/com-attach/8-adf2015-VTkHZFQhVXJXNFAi.pdf](http://www.arb.ca.gov/lists/com-attach/8-adf2015-VTkHZFQhVXJXNFAi.pdf)

Original File Name: Letter to ARB Chair\_ADF and LCFS comments\_02-13-15.pdf

Date and Time Comment Was Submitted: 2015-02-13 11:29:57

No Duplicates.



## **Comment 8 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Geoff  
Last Name: Cooper  
Email Address: gcooper@ethanolrfa.org  
Affiliation: RFA

Subject: RFA Comments on 2015 ISOR: LCFS Re-Adoption  
Comment:

See attached comments

Attachment: [www.arb.ca.gov/lists/com-attach/9-lcfs2015-WigAYAZmV1sLbgdo.pdf](http://www.arb.ca.gov/lists/com-attach/9-lcfs2015-WigAYAZmV1sLbgdo.pdf)

Original File Name: RFA Comments 2015 ISOR Final.pdf

Date and Time Comment Was Submitted: 2015-02-16 08:51:51

No Duplicates.

## **Comment 9 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: John

Last Name: Duff

Email Address: john@sorghumgrowers.com

Affiliation: National Sorghum Producers

Subject: National Sorghum Producers Comments on LCFS Re-adoption

Comment:

Thanks for the opportunity to comment. Please see the attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/11-lcfs2015-BnQGZQRkUWZXPIIi.pdf](http://www.arb.ca.gov/lists/com-attach/11-lcfs2015-BnQGZQRkUWZXPIIi.pdf)

Original File Name: readoption\_comments.pdf

Date and Time Comment Was Submitted: 2015-02-16 14:13:19

No Duplicates.

## **Comment 10 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Lyle  
Last Name: Schlyer  
Email Address: lschlyer@calgren.com  
Affiliation: Calgren Renewable Fuels

Subject: Comments on LCFS Readoption  
Comment:

Dear Chairman:

Calgren Renewable Fuels is a California ethanol producer that desires to use more grain sorghum as feed stock. Sorghum is low-water and, we believe, will help us reduce the carbon intensity of our fuel ethanol. We are in close touch with the National Sorghum Producers (NSP) and understand they will also submit comments.

While bemoaning the fact that others in the ethanol industry saw the need to file suit against the ARB regarding the LCFS, we applaud the ARB's reaction - re-authorizing the LCFS and working to improve the accuracy of carbon intensity scores sends the right message.

As will the NSP, we thank the ARB for paying special attention to sorghum iLUC, sorghum fertilizer requirements, and nitric oxide emissions from sorghum stover. We would ask that the ARB be alert for future information on sorghum root;shoot ratios and incorporate it into future versions of CA-GREET.

Lyle Schlyer  
President, Calgren Renewable Fuels

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-02-16 16:20:17

No Duplicates.

## **Comment 11 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Mary

Last Name: Solecki

Email Address: mary@e2.org

Affiliation: E2 (Environmental Entrepreneurs)

Subject: E2 comments LCFS re-adoption

Comment:

E2 supports the Air Resources Board vote to re-adopt the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/13-lcfs2015-AGVVYVAOBDYBdQhq.pdf](http://www.arb.ca.gov/lists/com-attach/13-lcfs2015-AGVVYVAOBDYBdQhq.pdf)

Original File Name: E2 ARB letter 2.17.15.pdf

Date and Time Comment Was Submitted: 2015-02-16 22:07:26

No Duplicates.

## **Comment 12 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Derek  
Last Name: Peine  
Email Address: dpeine@wpellc.com  
Affiliation: Western Plains Energy, LLC

Subject: LCFS and Sorghum ILUC  
Comment:

Chairman Nichols,

Western Plains Energy, LLC (WPE) is a Kansas-based sorghum ethanol producer. WPE feels that sorghum has an important role to play in helping California meet the greenhouse gas reduction goals set by the LCFS and reducing water usage on irrigated acres.

We have a strong affiliation with the National Sorghum Producers (NSP) and understand they are submitting comments as well. As NSP does, we applaud the ARB for its update of the LCFS and appreciate its special attention to sorghum iLUC, sorghum fertilizer requirements and N2O emissions from sorghum stover. We also recommend that the ARB focus attention on information related to sorghum root:shoot ratios, and as it becomes available and incorporate this information into future versions of CA-GREET.

Thank you for the opportunity to comment.

With Kindest Regards,  
Derek Peine  
Chief Executive Officer  
Western Plains Energy  
Oakley, KS

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-02-17 06:41:20

No Duplicates.

## **Comment 13 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Matt

Last Name: Durler

Email Address: matt.durler@conestogaenergy.com

Affiliation: Conestoga Energy Partners

Subject: Conestoga Energy Partners Comments on LCFS Re-adoption

Comment:

Chairman Nichols,

As I stated in the previous comment period, Conestoga Energy Partners owns and operates 3 ethanol plants in Southwest Kansas and the Texas panhandle. I believe that sorghum plays an important role in helping California reach its greenhouse gas reduction goals and our company to improve the sustainability of agriculture in our production region by reducing water usage.

I would like to echo the comments of the National Sorghum Producers applauding the ARB for its update of the LCFS and am particularly supportive of the attention given to the sorghum production systems. I would however encourage ARB to continue to focus attention on sorghum root:shoot ratios and as the information becomes available incorporate it into future versions of CA-GREET.

I appreciate the opportunity to comment, and your continued efforts in GHG reduction.

Sincerely,

Matt Durler

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-02-17 06:31:43

No Duplicates.

**Comment 14 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Jamieat

Last Name: Hall

Email Address: jhall@calstart.org

Affiliation:

Subject: CALSTART comments supporting LCFS re-adoption

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/16-lcfs2015-VzRVMU4ACBSIABh.pdf](http://www.arb.ca.gov/lists/com-attach/16-lcfs2015-VzRVMU4ACBSIABh.pdf)

Original File Name: CALSTART Comments on LCFS - Feb 2015.pdf

Date and Time Comment Was Submitted: 2015-02-17 08:03:10

No Duplicates.

## **Comment 15 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Jamie

Last Name: Knapp

Email Address: jamie@jknappcommunications.com

Affiliation: J Knapp Communications

Subject: Diverse group urges state to maintain commitment to LCFS

Comment:

A diverse collection of companies, business associations, utilities, public officials, investors, community and faith leaders, organized labor, and advocates for the environment, public health, consumers, low-income families and veterans are voicing their unwavering support for the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/17-lcfs2015-BmoFYARjBCQGbfQx.pdf](http://www.arb.ca.gov/lists/com-attach/17-lcfs2015-BmoFYARjBCQGbfQx.pdf)

Original File Name: LCFSLetter-Feb2015-FINAL-Formatted.pdf

Date and Time Comment Was Submitted: 2015-02-17 09:13:41

No Duplicates.



## **Comment 16 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Eric  
Last Name: McCarthy  
Email Address: emccarthy@proterra.com  
Affiliation: Proterra

Subject: Low Carbon Fuel Standard Energy Economy Ratio Update  
Comment:

Thank you for allowing us to submit comments. Please see attached Proterra's comments for the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/18-lcfs2015-UTICa1UmBwsBNldi.pdf](http://www.arb.ca.gov/lists/com-attach/18-lcfs2015-UTICa1UmBwsBNldi.pdf)

Original File Name: COR\_150213\_Waugh\_LCFS\_Update.pdf

Date and Time Comment Was Submitted: 2015-02-17 09:23:56

No Duplicates.

**Comment 17 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Shelby

Last Name: Neal

Email Address: sneal@biodiesel.org

Affiliation: National Biodiesel Board

Subject: Comments on ADF and LCFS Regulations

Comment:

Please accept these written comments on behalf of the National Biodiesel Board.

Shelby Neal

Attachment: [www.arb.ca.gov/lists/com-attach/9-ADF2015-AmNUNIQzU18Lbgdo.pdf](http://www.arb.ca.gov/lists/com-attach/9-ADF2015-AmNUNIQzU18Lbgdo.pdf)

Original File Name: ADF Comments 2-16-15.pdf

Date and Time Comment Was Submitted: 2015-02-16 16:14:47

No Duplicates.

## **Comment 18 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Bernardo

Last Name: Silva

Email Address: [bernardo@abbi.org.br](mailto:bernardo@abbi.org.br)

Affiliation: Brazilian Industrial Biotechnology Assc.

Subject: ABBI's Comments on Porposed Re-Adoption of the LCFS

Comment:

Please find attached the Brazilian Industrial Biotechnology Association's comments on the proposed re-adoption of the Low Carbon Fuel Standard.

Kind regards,  
Bernardo Silva

Attachment: [www.arb.ca.gov/lists/com-attach/20-lcfs2015-B2ECbQRrBTdROwJd.pdf](http://www.arb.ca.gov/lists/com-attach/20-lcfs2015-B2ECbQRrBTdROwJd.pdf)

Original File Name: Final ABBI Comments - Greet 2.0\_LCFS.pdf

Date and Time Comment Was Submitted: 2015-02-17 11:14:00

No Duplicates.

## **Comment 19 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Eileen  
Last Name: Tutt  
Email Address: eileen@caletc.com  
Affiliation:

Subject: Support for LCFS re Adoption  
Comment:

Dear Honorable Chairman Nichols and Members of the Board:

Please consider the attached documents supporting the California Electric Transportation Coalition comments which were submitted on February 13, 2015:

1. An assessment by ICF International characterizing the macroeconomic impacts and associated co-benefits of LCFS compliance.
2. An assessment by ICF International in cooperation with industry leaders and investors showing the alternative fuels market has evolved much faster than anticipated and the Low Carbon Fuel Standard is exceeding expectations. The report analyzes recent developments in the transportation sector and presents three scenarios that ratchet down the carbon intensity of transportation fuels 10 percent, to meet the goal of California's Low Carbon Fuel Standard by 2020. All three projections point to an increasingly diverse fuel supply, with more innovation leading to more renewable fuels and advanced vehicles.
3. An assessment by TIAX, LLC demonstrating that electricity consumption in on-road and off-road applications has the potential to produce a significant quantity of LCFS credits.
4. A powerpoint summarizing a related assessment by ICF International and E3 which demonstrates the benefits of transportation electrification for all Californians, whether or not they drive electric. These benefits extend beyond the air quality and greenhouse gas benefits to include benefits to ratepayers. The full reports are available online at [www.caletc.com](http://www.caletc.com).

Thank you for your consideration.  
Regards,  
Eileen Wenger Tutt, Executive Director  
California Electric Transportation Coalition

Attachment: [www.arb.ca.gov/lists/com-attach/21-lcfs2015-BmoGY1E2VnYGXwh7.zip](http://www.arb.ca.gov/lists/com-attach/21-lcfs2015-BmoGY1E2VnYGXwh7.zip)

Original File Name: LCFS Supporting Documents.zip

Date and Time Comment Was Submitted: 2015-02-17 11:11:25

No Duplicates.

**Comment 20 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Timothy V.  
Last Name: Johnson, Sc.D.  
Email Address: JohnsonTV@Corning.com  
Affiliation: Corning Incorporated

Subject: Corning Incorporated Comments on the Low Carbon Fuel Standard  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/22-lcfs2015-VzNUPVE1WFRVIAVx.pdf](http://www.arb.ca.gov/lists/com-attach/22-lcfs2015-VzNUPVE1WFRVIAVx.pdf)

Original File Name: DOE Storing CO2 with EOR 2009 - with email thread.pdf

Date and Time Comment Was Submitted: 2015-02-17 11:42:14

No Duplicates.

**Comment 21 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Jeremy

Last Name: Martin

Email Address: [jmartin@ucsusa.org](mailto:jmartin@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: Comments on indirect land use change

Comment:

Please accept the attached comments on the updates to indirect land use change accounting.

Regards,

Jeremy Martin

Attachment: [www.arb.ca.gov/lists/com-attach/23-lcfs2015-B3IBZFAiWVVRPlc7.pdf](http://www.arb.ca.gov/lists/com-attach/23-lcfs2015-B3IBZFAiWVVRPlc7.pdf)

Original File Name: UCS ILUC Comments.pdf

Date and Time Comment Was Submitted: 2015-02-17 12:18:52

No Duplicates.

## **Comment 22 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Simon

Last Name: Mui

Email Address: smui@nrdc.org

Affiliation:

Subject: Promotum Study on LCFS Compliance to 2025

Comment:

Please find attached a study by Promotum, a fuels and chemicals consultancy, that was commissioned by Natural Resources Defense Council, Union of Concerned Scientists, and Environmental Defense Fund.

The study demonstrates that a 10% target by 2020 is achievable using a variety of lower carbon fuels as well as technologies to reduce the carbon-intensity of refining and crude oil production. If the LCFS provides the credit incentive value assessed in ARB staff's proposed ISOR, a 15% reduction target could even be achieved by 2025.

Additional information can be found at:  
<http://www.nrdc.org/media/2015/150202.asp>

Best regards,  
Simon Mui, Ph.D.  
Senior Scientist and Director  
California Vehicles and Fuels  
Natural Resources Defense Council

Attachment: [www.arb.ca.gov/lists/com-attach/24-lcfs2015-UCAGcgZoBTtSOwRw.zip](http://www.arb.ca.gov/lists/com-attach/24-lcfs2015-UCAGcgZoBTtSOwRw.zip)

Original File Name: Promotum Study.zip

Date and Time Comment Was Submitted: 2015-02-17 12:15:44

No Duplicates.



## **Comment 23 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Simon

Last Name: Mui

Email Address: smui@nrdc.org

Affiliation:

Subject: Tetrattech/NRDC Study on Five Technologies to Reduce GHGs from Petro Supply Chain

Comment:

Please find attached a joint study by Tetrattech and NRDC on several opportunities to reduce GHG emissions and carbon-intensity directly at refineries and crude oil production facilities.

Five approaches to reducing carbon pollution directly from the petroleum supply chain were analyzed. The study's results point to a significant portion of LCFS compliance and credit generation being possible through these technologies.

Additional information can be found at:

<http://www.nrdc.org/energy/california-petroleum-carbon-reduction.asp>

Best regards,  
Simon Mui, Ph.D.  
Senior Scientist and Director  
California Vehicles and Fuels  
Natural Resources Defense Council

Attachment: [www.arb.ca.gov/lists/com-attach/25-lcfs2015-USUHZFciV3ZVMgh8.zip](http://www.arb.ca.gov/lists/com-attach/25-lcfs2015-USUHZFciV3ZVMgh8.zip)

Original File Name: Tetrattech Study.zip

Date and Time Comment Was Submitted: 2015-02-17 12:32:19

No Duplicates.

## **Comment 24 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Brent  
Last Name: Erickson  
Email Address: berickson@bio.org  
Affiliation: BIO

Subject: Comments on LCFS Readoption Plan  
Comment:

Please see attached for BIO's comments on the LCFS Readoption plan.

Attachment: [www.arb.ca.gov/lists/com-attach/26-lcfs2015-AWNTPANtUFxVMANs.pdf](http://www.arb.ca.gov/lists/com-attach/26-lcfs2015-AWNTPANtUFxVMANs.pdf)

Original File Name: BIO comments to CARB re LCFS readoption plan 02 17 15.pdf

Date and Time Comment Was Submitted: 2015-02-17 12:39:17

No Duplicates.

## **Comment 25 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Alexander  
Last Name: Menotti  
Email Address: amenotti@airlines.org  
Affiliation: Airlines for America

Subject: LCFS Readoption  
Comment:

Dear ARB,

Attached please find Airlines for America's comments on the proposed LCFS readoption.

Sincerely,  
Alex Menotti  
Environmental Affairs Regulatory Manager  
Airlines for America (A4A)

Attachment: [www.arb.ca.gov/lists/com-attach/27-lcfs2015-VzYAMl09VlpRNABv.pdf](http://www.arb.ca.gov/lists/com-attach/27-lcfs2015-VzYAMl09VlpRNABv.pdf)

Original File Name: A4A Comments on LCFS readoption 02-17-12.pdf

Date and Time Comment Was Submitted: 2015-02-17 12:34:58

No Duplicates.

**Comment 26 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Andy  
Last Name: Foster  
Email Address: andy.foster@aemetis.com  
Affiliation: Aemetis, Inc.

Subject: Sorghum LCFS Comment  
Comment:

Please see attached letter. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/28-lcfs2015-AWBcKARnV1sGYwRr.pdf](http://www.arb.ca.gov/lists/com-attach/28-lcfs2015-AWBcKARnV1sGYwRr.pdf)

Original File Name: ARB\_Commentltr\_Aemetis.pdf

Date and Time Comment Was Submitted: 2015-02-17 13:17:08

No Duplicates.

**Comment 27 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Carol

Last Name: Tjong

Email Address: ctjong@white-energy.com

Affiliation:

Subject: White Energy Comments on the LCFS Re-adoption

Comment:

Thanks for the opportunity to comment. See the attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/29-lcfs2015-ADIGMF1tAGYDKwk5.pdf](http://www.arb.ca.gov/lists/com-attach/29-lcfs2015-ADIGMF1tAGYDKwk5.pdf)

Original File Name: 2015.02.17 White Energy comments on CARB Proposed Regulation Order.pdf

Date and Time Comment Was Submitted: 2015-02-17 13:37:37

No Duplicates.

## **Comment 28 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

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

Subject: Comments on LCFS Reauthorization  
Comment:

Please find attached GlassPoint's comments on the proposed re-adoption of the Low Carbon Fuel Standard.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/30-lcfs2015-VzBXPVMzWXISJwd3.pdf](http://www.arb.ca.gov/lists/com-attach/30-lcfs2015-VzBXPVMzWXISJwd3.pdf)

Original File Name: GlassPoint-LCFS-comments-150217.pdf

Date and Time Comment Was Submitted: 2015-02-17 13:41:17

No Duplicates.

## **Comment 29 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Jonathan

Last Name: Lewis

Email Address: jlewis@catf.us

Affiliation: Clean Air Task Force

Subject: CATF Comments on Re-Adoption of LCFS

Comment:

Please accept the attached comments of the Clean Air Task Force concerning the re-adoption of the Low Carbon Fuel Standard and ARB proposals related to the lifecycle GHG emissions of biofuels.

Attachment: [www.arb.ca.gov/lists/com-attach/31-lcfs2015-VzQGYVInBzILUgZl.pdf](http://www.arb.ca.gov/lists/com-attach/31-lcfs2015-VzQGYVInBzILUgZl.pdf)

Original File Name: CATF Comments to ARB on LCFS Readoption\_021715.pdf

Date and Time Comment Was Submitted: 2015-02-17 13:57:53

No Duplicates.

## **Comment 30 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Lyle  
Last Name: Schlyer  
Email Address: lschlyer@calgren.com  
Affiliation: Calgren Renewable Fuels

Subject: CI Calculations re Fuel Ethanol  
Comment:

As with the sorghum issue, Calgren Renewable Fuels applauds the ARB for its handling of the re-authorization of the LCFS. Perhaps the re-authorization was prompted by the lawsuit brought by others in the ethanol industry. If so, we applaud the ARB for its measured and appropriate response. While Calgren did not and does not support the lawsuit, it does support the ARB's attempts to strengthen the LCFS.

To be stronger, the LCFS must be based upon good science. Calculation of life-cycle carbon intensities is inherently complicated and a few anomalies are to be expected. We believe our consultant has discovered one such anomaly regarding the CI impact of denaturant. Please review his comments as reflected in the attached summary. Correcting what appear to be inconsistencies and errors regarding the CI impact of denaturant on fuel ethanol will help strengthen the LCFS.

On a somewhat related subject, we applaud the ARB for correcting the erroneous 1:1 distillers grain-to-corn displacement ratio that appears in GREET 1.8. But we firmly believe and have previously submitted data showing that the displacement ratio varies somewhat depending upon whether distillers grain is fed to hogs, poultry, feedlot cattle or dairy cows. We urge the ARB to take note of relevant research in this area and apply it where applicable.

Thank you for the opportunity to comment.

Attachment: [www.arb.ca.gov/lists/com-attach/32-lcfs2015-UDZdLIM3WWYLUgZj.zip](http://www.arb.ca.gov/lists/com-attach/32-lcfs2015-UDZdLIM3WWYLUgZj.zip)

Original File Name: Fuel Ethanol Denaturant Issues.zip

Date and Time Comment Was Submitted: 2015-02-17 14:07:53

No Duplicates.



**Comment 31 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Curtis

Last Name: Wright

Email Address: cwright@iwpusa.com

Affiliation: Imperial Western Products

Subject: Comments on Low Carbon Fuel Standard and ADF regulations

Comment:

Please see my attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/33-lcfs2015-Bm9QIQR1Ag5RNAVq.doc](http://www.arb.ca.gov/lists/com-attach/33-lcfs2015-Bm9QIQR1Ag5RNAVq.doc)

Original File Name: IWP comments for LCFS-ADF feb 19 2015.doc

Date and Time Comment Was Submitted: 2015-02-17 14:08:34

No Duplicates.

**Comment 32 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Ralph

Last Name: Moran

Email Address: ralph.moran@bp.com

Affiliation:

Subject: BP America Comments on LCFS Re-adoption

Comment:

BP America Comments

Attachment: [www.arb.ca.gov/lists/com-attach/34-lcfs2015-UTMGcF0DU2MHbgk.pdf](http://www.arb.ca.gov/lists/com-attach/34-lcfs2015-UTMGcF0DU2MHbgk.pdf)

Original File Name: BP comments to CARB on LCFS Re-adoption 2 15.pdf

Date and Time Comment Was Submitted: 2015-02-17 14:27:21

No Duplicates.

## **Comment 33 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Rock  
Last Name: Zierman  
Email Address: rock@cipa.org  
Affiliation: CIPA

Subject: CIPA Comments on LCFS Innovative Crude Provisions  
Comment:

Attached are CIPA's comments on the Proposed LCFS Innovative Crude Provisions.

Attachment: [www.arb.ca.gov/lists/com-attach/35-lcfs2015-VTYFagd2BTdWD1I+.pdf](http://www.arb.ca.gov/lists/com-attach/35-lcfs2015-VTYFagd2BTdWD1I+.pdf)

Original File Name: CIPA LCFS Comment Letter with enclosure 2-17-2015.pdf

Date and Time Comment Was Submitted: 2015-02-17 14:55:24

No Duplicates.

**Comment 34 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Celia  
Last Name: DuBose  
Email Address: [celia.dubose@cabiodieselalliance.org](mailto:celia.dubose@cabiodieselalliance.org)  
Affiliation: California Biodiesel Alliance

Subject: Comment: LCFS and ADF proposals for Feb. 19th board hearing  
Comment:

Clerk of the Board:

Please accept the attached letter of public comment to Chair Nichols from the California Biodiesel Alliance, the state's biodiesel industry trade association. Thank you.

Sincerely,

Celia DuBose  
Executive Director  
California Biodiesel Alliance  
[www.californiabiodieselalliance.org](http://www.californiabiodieselalliance.org)

Attachment: [www.arb.ca.gov/lists/com-attach/36-lcfs2015-VjVXM1ExUI4Kbwhn.pdf](http://www.arb.ca.gov/lists/com-attach/36-lcfs2015-VjVXM1ExUI4Kbwhn.pdf)

Original File Name: CBA Comments\_LCFS & ADF Hearing 2.19.15.pdf

Date and Time Comment Was Submitted: 2015-02-17 15:06:16

No Duplicates.

## **Comment 35 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Kelly  
Last Name: Stone  
Email Address: Kelly.Stone@actionaid.org  
Affiliation: ActionAid USA

Subject: Global Impacts of Rising Biofuel Mandates on Food Security  
Comment:

Via Electronic Mail

February 17, 2015

Mary Nichols and Board Members  
California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Re: Low Carbon Fuel Standard

Dear Chairman Nichols and CARB Board Members:  
ActionAid USA, a nonprofit organization working with millions of people around the world and the US to fight the causes of poverty and injustice, applauds the California Air Resources Board's (CARB) proactive approach to climate change mitigation. However, as the Board considers re-adoption of the Low Carbon Fuel Standard (LCFS), we strongly urge it not to lower the indirect land use change (ILUC) score for corn ethanol.  
Attached you will find a working paper by Timothy A. Wise and Emily Cole of the Global Development and Environment Institute at Tufts University, "Mandating Food Insecurity: The Global Impacts of Rising Biofuel Mandates and Targets." This paper studies the impact of government biofuel mandates and estimates that mandates will drive a 43% growth in demand for biofuels over the next decade. This level of growth has extremely concerning implications for food security, as well as land and water use. Further incentivizing the use of corn ethanol, which undermines food security and has questionable environmental benefits, would be step in the wrong direction.  
Crop-based biofuels, particularly corn ethanol, undermine food security around the world by driving up food prices and increasing price volatility.  
This not only true for corn products people consume directly; corn is one of the most popular feeds for animals, so an increase in the price of corn also increases the price of meat and dairy products. A 2012 study published by ActionAid estimated that US ethanol expansion cost net corn importing countries \$11.6 billion between 2006 and 2011. \$6.8 billion of this additional cost was born by developing countries. In fact, during fiscal year 2011, the U.S. spent as much on food aid to Guatemala as the additional money Guatemala paid to import corn at the increased prices.

Corn ethanol also presents environmental concerns.

In addition to the emissions from direct and indirect land use change, corn ethanol undermines water quality. The nitrogen, phosphorous and other chemicals applied to corn crops are washed from those crops into drainage, local water supplies, rivers and eventually oceans. This poisons the water, and in the case of nitrogen, creates algae blooms that reduce the oxygen levels in the water. The resulting dead zones kill fish and aquatic life or force them to move elsewhere. In 2014, the dead zone in the Gulf of Mexico was 5,052 square miles. The impact of biofuel expansion on water quantity should not be ignored. Corn uses more irrigated water than any other crop in the US, even though the overwhelming majority of corn is currently rain-fed. In recent years, irrigated corn crops increased with the growth in corn production. Perhaps not surprisingly, 87% of irrigated corn crops are grown in areas already showing extremely high water stress. Considering the water demands of growing corn and the strain current corn production is placing on water levels, policy makers should be cautious about policies that encourage further demand.

One other lesson to take from "Mandating Food Insecurity," is that government policies continue to profoundly shape the biofuels industry. Government mandates have and will continue to drive demand growth for first-generation biofuels, such as corn ethanol, that undermine food security and hurt the environment. I strongly urge the Board to ensure that the LCFS does not further incentivize corn ethanol expansion.

Thank you for your consideration and please do not hesitate to contact us should you need additional information.  
Sincerely,

Kelly Stone  
Biofuels Policy Analyst  
ActionAid USA  
Kelly.Stone@actionaid.org

"Fueling the Food Crisis: The Cost to Developing Countries of US Corn Ethanol Expansion." ActionAid USA. October 2012.

<http://water.epa.gov/type/watersheds/named/msbasin/zone.cfm>

<http://voices.nationalgeographic.com/2015/02/10/corn-remains-king-in-usda-irrigation-survey/>

Attachment: [www.arb.ca.gov/lists/com-attach/37-lcfs2015-VjtQNwRrUmUFYgZy.pdf](http://www.arb.ca.gov/lists/com-attach/37-lcfs2015-VjtQNwRrUmUFYgZy.pdf)

Original File Name: Mandating Food Insecurity\_The Global Impacts of Rising Biofuel Mandates and Targets.pdf

Date and Time Comment Was Submitted: 2015-02-17 15:04:28

No Duplicates.

**Comment 36 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Jennifer

Last Name: Case

Email Address: jennifer@newleafbiofuel.com

Affiliation:

Subject: LCFS comments

Comment:

Attached

Attachment: [www.arb.ca.gov/lists/com-attach/38-lcfs2015-UT9RO1c0BwsFc1Ug.pdf](http://www.arb.ca.gov/lists/com-attach/38-lcfs2015-UT9RO1c0BwsFc1Ug.pdf)

Original File Name: NLB public comment ADF LCFS 2.15.pdf

Date and Time Comment Was Submitted: 2015-02-17 15:13:30

No Duplicates.

## **Comment 37 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Chris

Last Name: Ryan

Email Address: [chris.ryan@gov.ab.ca](mailto:chris.ryan@gov.ab.ca)

Affiliation: Government of Alberta

Subject: Government of Alberta Submission on Low Carbon Fuel Standard Re-adoption  
Comment:

Please see attached letter and technical submission from the  
Government of Alberta.

Attachment: [www.arb.ca.gov/lists/com-attach/39-lcfs2015-BmECawN0U2VSJlc5.zip](http://www.arb.ca.gov/lists/com-attach/39-lcfs2015-BmECawN0U2VSJlc5.zip)

Original File Name: Government of Alberta LCFS 2015.zip

Date and Time Comment Was Submitted: 2015-02-17 14:58:35

No Duplicates.



**Comment 38 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Don  
Last Name: Gilstrap  
Email Address: dgilstrap@chevron.com  
Affiliation: Chevron

Subject: Chevron Comments on the Proposed LCFS Re-Adoption  
Comment:

Chevron comments

Attachment: [www.arb.ca.gov/lists/com-attach/40-lcfs2015-B2QHaVYyUndWIGJt.pdf](http://www.arb.ca.gov/lists/com-attach/40-lcfs2015-B2QHaVYyUndWIGJt.pdf)

Original File Name: Chevron LCFS Re-Adoption Comments.pdf

Date and Time Comment Was Submitted: 2015-02-17 15:33:54

No Duplicates.

**Comment 39 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Matthew  
Last Name: Plummer  
Email Address: m3pu@pge.com  
Affiliation: PG&E

Subject: PG&E Comments on February 19 Board Hearing on LCFS Re-Adoption  
Comment:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the proposed re-adoption of the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/41-lcfs2015-WytVNANnWVUKb1Q7.pdf](http://www.arb.ca.gov/lists/com-attach/41-lcfs2015-WytVNANnWVUKb1Q7.pdf)

Original File Name: PGE Comments February 19 Board Hearing on LCFS Re-Adoption.pdf

Date and Time Comment Was Submitted: 2015-02-17 15:30:51

No Duplicates.

**Comment 40 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

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

Subject: WSPA Comments on LCFS Hearing  
Comment:

Attached please find WSPA's comment letter on the February 19th  
CARB Board Hearing item on the LCFS Reauthorization.

Attachment: [www.arb.ca.gov/lists/com-attach/42-lcfs2015-AnVQJQFwBzUHXglq.pdf](http://www.arb.ca.gov/lists/com-attach/42-lcfs2015-AnVQJQFwBzUHXglq.pdf)

Original File Name: WSPA Comments on CA LCFS Reauthorization 2015 final.pdf

Date and Time Comment Was Submitted: 2015-02-17 15:35:03

No Duplicates.

**Comment 41 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Miles

Last Name: Heller

Email Address: miles.t.heller@tsocorp.com

Affiliation: Tesoro

Subject: Comments on LCFS Re-Adoption

Comment:

Attached are Tesoro's comments to the 45-day package related to the LCFS re-adoption for your consideration. Tesoro appreciates the opportunity to share our thoughts.

Attachment: [www.arb.ca.gov/lists/com-attach/43-lcfs2015-UCQFZIUnVmoEcFQ7.pdf](http://www.arb.ca.gov/lists/com-attach/43-lcfs2015-UCQFZIUnVmoEcFQ7.pdf)

Original File Name: Tesoro LCFS comment letter 2-2015 final.pdf

Date and Time Comment Was Submitted: 2015-02-17 15:35:58

No Duplicates.

## **Comment 42 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Simon

Last Name: Mui

Email Address: smui@nrdc.org

Affiliation:

Subject: NGO Coalitiion Letter Supporting LCFS Readoption and ADF Rule  
Comment:

On behalf of a coalition of environmental, public health, and science-based organizations, I am submitting a comment letter supporting the Air Resources Board staff's proposal to readopt the Low Carbon Fuel Standard (LCFS) together with the Alternative Diesel Fuel (ADF) Rulemaking. The comments also reinforce ARB's continued progress on the LCFS in key areas over the mid and longer-term.

Please feel to contact me if you have further questions.

Best regards,

Simon Mui, Ph.D.  
Senior Scientist and Director  
California Vehicles and Fuels  
Natural Resources Defense Council

Attachment: [www.arb.ca.gov/lists/com-attach/44-lcfs2015-WjQFZFM9AH4CaFAz.pdf](http://www.arb.ca.gov/lists/com-attach/44-lcfs2015-WjQFZFM9AH4CaFAz.pdf)

Original File Name: NGO-LCFS-Technical-Policy-Letter-Final.pdf

Date and Time Comment Was Submitted: 2015-02-17 15:50:27

No Duplicates.

**Comment 43 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Joshua

Last Name: Willter

Email Address: [jwillter@sierraresearch.com](mailto:jwillter@sierraresearch.com)

Affiliation: Sierra Research

Subject: POET Comments

Comment:

POET Comments (Part 1 of 1)

Attachment: [www.arb.ca.gov/lists/com-attach/45-lcfs2015-ViYHbgZiVXICWwNg.pdf](http://www.arb.ca.gov/lists/com-attach/45-lcfs2015-ViYHbgZiVXICWwNg.pdf)

Original File Name: POET\_comment\_filing\_2015-02-17.pdf

Date and Time Comment Was Submitted: 2015-02-17 16:03:43

No Duplicates.

## **Comment 44 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Daniel

Last Name: Sinks

Email Address: h.daniel.sinks@p66.com

Affiliation: Phillips 66

Subject: Comments on LCFS Re-Adoption

Comment:

Thank you for the opportunity to comment. Our comments are attached.

Attachment: [www.arb.ca.gov/lists/com-attach/46-lcfs2015-USFSYgE2BQkDZIU6.pdf](http://www.arb.ca.gov/lists/com-attach/46-lcfs2015-USFSYgE2BQkDZIU6.pdf)

Original File Name: P66 Comments on LCFS Amendments 2\_17\_15.pdf

Date and Time Comment Was Submitted: 2015-02-17 15:56:32

No Duplicates.

**Comment 45 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Joyce

Last Name: Dillard

Email Address: dillardjoyce@yahoo.com

Affiliation:

Subject: Low Carbon Fuel Standard Regulation Draft Environmental Assessment

Comment:

Attached.

Attachment: [www.arb.ca.gov/lists/com-attach/47-lcfs2015-BmVWP1E9UW9VNgZo.pdf](http://www.arb.ca.gov/lists/com-attach/47-lcfs2015-BmVWP1E9UW9VNgZo.pdf)

Original File Name: Comments ARB Low Carbon Fuel Standard Regulation Draft Environmental Assessment due 2.17.2015.pdf

Date and Time Comment Was Submitted: 2015-02-17 16:13:26

No Duplicates.



## **Comment 46 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Joshua

Last Name: Willter

Email Address: jwillter@sierraresearch.com

Affiliation: Sierra Research

Subject: GrowthEnergy Comments / Part 1 of 6

Comment:

Due to the file size limit for each filing, we are submitting a total of 6 parts.

Attachment: [www.arb.ca.gov/lists/com-attach/48-lcfs2015-AWYFcVU7VnIHdQRs.pdf](http://www.arb.ca.gov/lists/com-attach/48-lcfs2015-AWYFcVU7VnIHdQRs.pdf)

Original File Name: GrowthEnergy\_Comment\_Filing\_2015-02-17.pdf

Date and Time Comment Was Submitted: 2015-02-17 16:18:41

No Duplicates.

**Comment 47 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Joshua  
Last Name: Willter  
Email Address: jwillter@sierraresearch.com  
Affiliation: Sierra Research

Subject: GrowthEnergy Comments / Part 2 of 6  
Comment:

Due to the file size limit for each filing, we are submitting a total of 6 parts.

Attachment: [www.arb.ca.gov/lists/com-attach/49-lcfs2015-VDFQLgBpWWNQNA11.zip](http://www.arb.ca.gov/lists/com-attach/49-lcfs2015-VDFQLgBpWWNQNA11.zip)

Original File Name: Exhibit 1.zip

Date and Time Comment Was Submitted: 2015-02-17 16:20:43

No Duplicates.

## **Comment 48 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Joshua

Last Name: Willter

Email Address: [jwillter@sierraresearch.com](mailto:jwillter@sierraresearch.com)

Affiliation: Sierra Research

Subject: GrowthEnergy Comments / Part 3 of 6

Comment:

Due to the file size limit for each filing, we are submitting a total of 6 parts.

Attachment: [www.arb.ca.gov/lists/com-attach/51-lcfs2015-UDVWKF6UWsKbglg.zip](http://www.arb.ca.gov/lists/com-attach/51-lcfs2015-UDVWKF6UWsKbglg.zip)

Original File Name: Exhibit 2.zip

Date and Time Comment Was Submitted: 2015-02-17 16:22:28

No Duplicates.

**Comment 49 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Joshua

Last Name: Willter

Email Address: [jwillter@sierraresearch.com](mailto:jwillter@sierraresearch.com)

Affiliation: Sierra Research

Subject: GrowthEnergy Comments / Part 4 of 6

Comment:

Due to the file size limit for each filing, we are submitting a total of 6 parts.

Attachment: [www.arb.ca.gov/lists/com-attach/52-lcfs2015-UjdWKFc+WGICZgRt.zip](http://www.arb.ca.gov/lists/com-attach/52-lcfs2015-UjdWKFc+WGICZgRt.zip)

Original File Name: Exhibit 3.zip

Date and Time Comment Was Submitted: 2015-02-17 16:23:31

No Duplicates.

## **Comment 50 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Joshua

Last Name: Willter

Email Address: [jwillter@sierraresearch.com](mailto:jwillter@sierraresearch.com)

Affiliation: Sierra Research

Subject: GrowthEnergy Comments / Part 5 of 6

Comment:

Due to the file size limit for each filing, we are submitting a total of 6 parts.

Attachment: [www.arb.ca.gov/lists/com-attach/53-lcfs2015-BmNWKABpADpRNVA5.zip](http://www.arb.ca.gov/lists/com-attach/53-lcfs2015-BmNWKABpADpRNVA5.zip)

Original File Name: Exhibit 4.zip

Date and Time Comment Was Submitted: 2015-02-17 16:25:25

No Duplicates.

**Comment 51 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Joshua

Last Name: Willter

Email Address: [jwillter@sierraresearch.com](mailto:jwillter@sierraresearch.com)

Affiliation: Sierra Research

Subject: GrowthEnergy Comments / Part 6 of 6

Comment:

Due to the file size limit for each filing, we are submitting a total of 6 parts.

Attachment: [www.arb.ca.gov/lists/com-attach/54-lcfs2015-AmcFe1U8Bz0KblU8.zip](http://www.arb.ca.gov/lists/com-attach/54-lcfs2015-AmcFe1U8Bz0KblU8.zip)

Original File Name: Exhibit 5.zip

Date and Time Comment Was Submitted: 2015-02-17 16:27:11

No Duplicates.

**Comment 52 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Melinda

Last Name: Hicks

Email Address: mhicks@kernoil.com

Affiliation: Kern Oil & Refining Co.

Subject: Comments on LCFS Re-Adoption

Comment:

Attached please find Kern Oil's comments on the LCFS proposal.  
Thank you for the opportunity to comment.

Attachment: [www.arb.ca.gov/lists/com-attach/55-lcfs2015-UTpTOIMgVVkKYFU2.pdf](http://www.arb.ca.gov/lists/com-attach/55-lcfs2015-UTpTOIMgVVkKYFU2.pdf)

Original File Name: KOR LCFS Readoption Comment Letter 2\_17\_15 final.pdf

Date and Time Comment Was Submitted: 2015-02-17 16:23:11

No Duplicates.

## **Comment 53 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Jenny

Last Name: Bard

Email Address: jenny.bard@lung.org

Affiliation:

Subject: CA health group letter in support of LCFS

Comment:

Attached please find letter signed by 31 health and medical organizations in CA in support of the re-adoption of the Low Carbon Fuel Standard. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/56-lcfs2015-Vj4BYIMzUm0Bcwhg.pdf](http://www.arb.ca.gov/lists/com-attach/56-lcfs2015-Vj4BYIMzUm0Bcwhg.pdf)

Original File Name: Health Group letter re 2015 LCFS Re-Adoption.pdf

Date and Time Comment Was Submitted: 2015-02-17 16:28:42

No Duplicates.



## **Comment 54 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Reid

Last Name: Detchon

Email Address: rdetchon@unfoundation.org

Affiliation: Energy Future Coalition

Subject: Comments Submitted by the Energy Future Coalition and the Urban Air Initiative  
Comment:

Comments on Proposed Re-Adoption of the Low Carbon Fuel Standard  
are attached. Item 1 of 5: Comments.

Attachment: [www.arb.ca.gov/lists/com-attach/57-lcfs2015-VjVRNIEiV2YHbQVm.docx](http://www.arb.ca.gov/lists/com-attach/57-lcfs2015-VjVRNIEiV2YHbQVm.docx)

Original File Name: CARBlcfscomments final.docx

Date and Time Comment Was Submitted: 2015-02-17 15:54:10

No Duplicates.

**Comment 55 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Reid

Last Name: Detchon

Email Address: rdetchon@unfoundation.org

Affiliation: Energy Future Coalition

Subject: Comments Submitted by the Energy Future Coalition and the Urban Air Initiative  
Comment:

Comments on Proposed Re-Adoption of the Low Carbon Fuel Standard  
are attached. Item 2 of 5: Appendix I.

Attachment: [www.arb.ca.gov/lists/com-attach/58-lcfs2015-UTAFc1YnVGIHbwt.docx](http://www.arb.ca.gov/lists/com-attach/58-lcfs2015-UTAFc1YnVGIHbwt.docx)

Original File Name: Appendix I.docx

Date and Time Comment Was Submitted: 2015-02-17 15:54:10

No Duplicates.

**Comment 56 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Reid

Last Name: Detchon

Email Address: rdetchon@unfoundation.org

Affiliation: Energy Future Coalition

Subject: Comments Submitted by the Energy Future Coalition and the Urban Air Initiative  
Comment:

Comments on Proposed Re-Adoption of the Low Carbon Fuel Standard  
are attached. Item 3 of 5: Appendix II.

Attachment: [www.arb.ca.gov/lists/com-attach/59-lcfs2015-AGFSJFUKVWMBaQBk.docx](http://www.arb.ca.gov/lists/com-attach/59-lcfs2015-AGFSJFUKVWMBaQBk.docx)

Original File Name: Appendix II.docx

Date and Time Comment Was Submitted: 2015-02-17 15:54:10

No Duplicates.

**Comment 57 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Ross  
Last Name: Nakasone  
Email Address: rossn@bluegreenalliance.org  
Affiliation: BlueGreen Alliance

Subject: Comments on Low Carbon Fuel Standard Re-adoption  
Comment:

Please see the attached document.

Attachment: [www.arb.ca.gov/lists/com-attach/60-lcfs2015-AG4GcgNmADAGX1Q2.pdf](http://www.arb.ca.gov/lists/com-attach/60-lcfs2015-AG4GcgNmADAGX1Q2.pdf)

Original File Name: NRDC BGA LCFS RegAdoption Comments\_FINAL\_20150217.pdf

Date and Time Comment Was Submitted: 2015-02-17 16:25:43

No Duplicates.

**Comment 58 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Reid

Last Name: Detchon

Email Address: rdetchon@unfoundation.org

Affiliation: Energy Future Coalition

Subject: Comments Submitted by the Energy Future Coalition and the Urban Air Initiative  
Comment:

Comments on Proposed Re-Adoption of the Low Carbon Fuel Standard  
are attached. Item 4 of 5: Alverson paper.

Attachment: [www.arb.ca.gov/lists/com-attach/61-lcfs2015-WjtdN1QjBTMKfgBz.pdf](http://www.arb.ca.gov/lists/com-attach/61-lcfs2015-WjtdN1QjBTMKfgBz.pdf)

Original File Name: Alverson.pdf

Date and Time Comment Was Submitted: 2015-02-17 15:54:10

No Duplicates.

## **Comment 59 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Reid

Last Name: Detchon

Email Address: rdetchon@unfoundation.org

Affiliation: Energy Future Coalition

Subject: Comments Submitted by the Energy Future Coalition and the Urban Air Initiative  
Comment:

Comments on Proposed Re-Adoption of the Low Carbon Fuel Standard  
are attached. Item 5 of 5: MathPro paper.

Attachment: [www.arb.ca.gov/lists/com-attach/62-lcfs2015-UD0FYgN2Vm0Bd1Ig.pdf](http://www.arb.ca.gov/lists/com-attach/62-lcfs2015-UD0FYgN2Vm0Bd1Ig.pdf)

Original File Name: MathPro.pdf

Date and Time Comment Was Submitted: 2015-02-17 15:54:10

No Duplicates.

## **Comment 60 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Brian

Last Name: Nowicki

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

Affiliation: Center for Biological Diversity

Subject: Support

Comment:

The Center for Biological Diversity strongly supports the LCFS as a crucial tool in addressing the large proportion of California's greenhouse gas emissions and other air pollutants that comes from the production, transport, refining, and combustion of transportation fuels.

Attachment: [www.arb.ca.gov/lists/com-attach/63-lcfs2015-VDcAYwBvVHMDYAV3.pdf](http://www.arb.ca.gov/lists/com-attach/63-lcfs2015-VDcAYwBvVHMDYAV3.pdf)

Original File Name: Center for Biol Divers support for LCFS 02 17 2015.pdf

Date and Time Comment Was Submitted: 2015-02-17 16:35:33

No Duplicates.

**Comment 61 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Dayne

Last Name: Delahoussaye

Email Address: dayne.delahoussaye@nesteoil.com

Affiliation:

Subject: LCFS Re-Adoption Comments

Comment:

Neste Oil Comments to LCFS

Attachment: [www.arb.ca.gov/lists/com-attach/64-lcfs2015-WmgHMQAwbGJWfQY2.pdf](http://www.arb.ca.gov/lists/com-attach/64-lcfs2015-WmgHMQAwbGJWfQY2.pdf)

Original File Name: 2015-02-17 Coments to ARB Board - LCFS readoption proposal.pdf

Date and Time Comment Was Submitted: 2015-02-17 16:37:06

No Duplicates.



## **Comment 62 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Stefan

Last Name: Unnasch

Email Address: Unnasch@lifecycleassociates.com

Affiliation: Life Cycle Associates, LLC.

Subject: Comments on the Treatment of Nitrogen Fixation in Soybeans

Comment:

This comment addresses the impact of nitrogen fixation in soybeans and details the effects on the soy biodiesel and corn ethanol pathway.

Please don't hesitate to contact me if you have any questions,

Best regards,

Stefan Unnasch

Attachment: [www.arb.ca.gov/lists/com-attach/65-lcfs2015-ViNWPIY5AzEKf1Az.pdf](http://www.arb.ca.gov/lists/com-attach/65-lcfs2015-ViNWPIY5AzEKf1Az.pdf)

Original File Name: Unnasch\_-\_LCFS\_N2O\_Comments\_Feb\_2015\_v1.pdf

Date and Time Comment Was Submitted: 2015-02-17 16:26:07

No Duplicates.

**Comment 63 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Dayne

Last Name: Delahoussaye

Email Address: dayne.delahoussaye@nesteoil.com

Affiliation:

Subject: LCFS Re-Adoption Comments

Comment:

Attachment A to Neste Oil Comments

Attachment: [www.arb.ca.gov/lists/com-attach/66-lcfs2015-UmBTZVdnVDIFLIdn.pdf](http://www.arb.ca.gov/lists/com-attach/66-lcfs2015-UmBTZVdnVDIFLIdn.pdf)

Original File Name: 2015-02-17 Coments to ARB Board - iLUC - Attachment A.pdf

Date and Time Comment Was Submitted: 2015-02-17 16:40:18

No Duplicates.

**Comment 64 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Ted  
Last Name: Kniesche  
Email Address: [tkniesche@fulcrum-bioenergy.com](mailto:tkniesche@fulcrum-bioenergy.com)  
Affiliation: Fulcrum BioEnergy Inc

Subject: Re-Adoption of the CA LCFS  
Comment:

Please find attached comments from Fulcrum BioEnergy regarding the Re-Adoption of the CA LCFS.

Sincerely,

Ted Kniesche  
Fulcrum BioEnergy, Inc.

Attachment: [www.arb.ca.gov/lists/com-attach/67-lcfs2015-AmRcL1U4VGRWIgVw.pdf](http://www.arb.ca.gov/lists/com-attach/67-lcfs2015-AmRcL1U4VGRWIgVw.pdf)

Original File Name: Fulcrum BioEnergy Comments - LCFS Re-Adoption 02.17.15.pdf

Date and Time Comment Was Submitted: 2015-02-17 16:55:36

No Duplicates.

## **Comment 65 for Low Carbon Fuel Standard 2015 (lcfs2015) - 45 Day.**

First Name: Stefan

Last Name: Unnasch

Email Address: Unnasch@lifecycleassociates.com

Affiliation: Life Cycle Associates, LLC.

Subject: California GREET Marginal Power

Comment:

This comment addresses the California marginal electricity mix deficit in CA\_GREET2.0.

Please don't hesitate to contact me if you have any questions,

Best regards,

Stefan Unnasch

Attachment: [www.arb.ca.gov/lists/com-attach/68-lcfs2015-USQHb1M8UGJVIAJh.pdf](http://www.arb.ca.gov/lists/com-attach/68-lcfs2015-USQHb1M8UGJVIAJh.pdf)

Original File Name: Unnasch\_-\_CA\_GREET\_Marginal\_Power v2.pdf

Date and Time Comment Was Submitted: 2015-02-17 16:40:50

No Duplicates.

## **Comment 1 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Leticia

Last Name: Phillips

Email Address: Non-web submitted comment

Affiliation: UNICA

Subject: UNICA's Comments on CARB Staff Report: Initial Statement of Reasons

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/69-lcfs2015-BmoHZF0oWWMCZwNq.pdf](http://www.arb.ca.gov/lists/com-attach/69-lcfs2015-BmoHZF0oWWMCZwNq.pdf)

Original File Name: Leticia Phillips Written Submission 15-2-4.pdf

Date and Time Comment Was Submitted: 2015-02-24 12:07:33

No Duplicates.

## **Comment 2 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Susan

Last Name: Lafferty

Email Address: Non-web submitted comment

Affiliation: Sutherland

Subject: Comments on the Re-adoption of the Low Carbon Fuel Standard

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/70-lcfs2015-VSYGdVMhBzVQOARb.pdf](http://www.arb.ca.gov/lists/com-attach/70-lcfs2015-VSYGdVMhBzVQOARb.pdf)

Original File Name: Susan Lafferty Written Submission 15-2-4.pdf

Date and Time Comment Was Submitted: 2015-02-24 12:07:33

No Duplicates.

### **Comment 3 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Thomas

Last Name: Darlington

Email Address: Non-web submitted comment

Affiliation: POET

Subject: Status of Recommended Items

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/72-lcfs2015-UiYCbFY4UmxVMgh7.pdf](http://www.arb.ca.gov/lists/com-attach/72-lcfs2015-UiYCbFY4UmxVMgh7.pdf)

Original File Name: Thomas Darlington Written Submission 15-2-4.pdf

Date and Time Comment Was Submitted: 2015-02-24 12:07:33

No Duplicates.

## **Comment 4 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Shannon

Last Name: Baker-Bransletter

Email Address: Non-web submitted comment

Affiliation: Consumers Union & Consumer Reports

Subject: Comments Regarding California's Low Carbon Fuel Standard

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/73-lcfs2015-VyRRPwRkVmsFbQdo.pdf](http://www.arb.ca.gov/lists/com-attach/73-lcfs2015-VyRRPwRkVmsFbQdo.pdf)

Original File Name: Shannon Baker-Bransletter Written Submission 15-2-4.pdf

Date and Time Comment Was Submitted: 2015-02-24 12:07:33

No Duplicates.



## **Comment 5 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Gary

Last Name: Grimes

Email Address: Non-web submitted comment

Affiliation: ALON USA

Subject: Comments on the LCLE Provisions in the Proposed LCFS Regulation

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/74-lcfs2015-AGdWMVwvU3lRCAJl.pdf](http://www.arb.ca.gov/lists/com-attach/74-lcfs2015-AGdWMVwvU3lRCAJl.pdf)

Original File Name: Gary Grimes Written Submission 15-2-4.pdf

Date and Time Comment Was Submitted: 2015-02-24 12:07:33

No Duplicates.

## **Comment 6 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Bonnie

Last Name: Holmes-Gen

Email Address: Non-web submitted comment

Affiliation: American Lung Association

Subject: Low Carbon Fuel Standard: Health and Medical Support

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/75-lcfs2015-VjQBafC4Az4Fagdi.pdf](http://www.arb.ca.gov/lists/com-attach/75-lcfs2015-VjQBafC4Az4Fagdi.pdf)

Original File Name: Bonnie Holmes-Gen Written Submission 15-2-4.pdf

Date and Time Comment Was Submitted: 2015-02-24 12:07:33

No Duplicates.

## **Comment 7 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Jonathan

Last Name: Lewis

Email Address: Non-web submitted comment

Affiliation: Clean Air Task Force

Subject: Comments on the Proposed Re-Adoption of the Low Carbon Fuel Standard  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/76-lcfs2015-AGoFbARrBTcLeQBo.pdf](http://www.arb.ca.gov/lists/com-attach/76-lcfs2015-AGoFbARrBTcLeQBo.pdf)

Original File Name: Jonathan Lewis Written Submission 15-2-4.pdf

Date and Time Comment Was Submitted: 2015-02-24 12:07:33

No Duplicates.

## **Comment 8 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Colin

Last Name: Murphy

Email Address: Non-web submitted comment

Affiliation: NextGen Climate

Subject: Comments on the Proposed Re-Adoption of the Low Carbon Fuel Standard

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/78-lcfs2015-VzRUPQRpUWtSOIUK.pdf](http://www.arb.ca.gov/lists/com-attach/78-lcfs2015-VzRUPQRpUWtSOIUK.pdf)

Original File Name: Colin Murphy Written Submission 15-2-4.pdf

Date and Time Comment Was Submitted: 2015-02-24 12:07:33

No Duplicates.

## **Comment 9 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Graham

Last Name: Noyes

Email Address: Non-web submitted comment

Affiliation: Low Carbon Fuels Coalition

Subject: Comment Regarding the Proposed Re-Adoption of an Updated Low Carbon Fuel Standard

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/79-lcfs2015-UTYHcwdnU2gEYwVo.pdf](http://www.arb.ca.gov/lists/com-attach/79-lcfs2015-UTYHcwdnU2gEYwVo.pdf)

Original File Name: Graham Noyes Written Submission 15-2-4.pdf

Date and Time Comment Was Submitted: 2015-02-24 12:07:33

No Duplicates.

## **Comment 10 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Joe

Last Name: Gershen

Email Address: Non-web submitted comment

Affiliation: Biodiesel Industry Veteran

Subject: Support for LCFS Readoption and ADF Regulation Adoption

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/81-lcfs2015-VjxQOVYyAw9WN1I3.pdf](http://www.arb.ca.gov/lists/com-attach/81-lcfs2015-VjxQOVYyAw9WN1I3.pdf)

Original File Name: Joe Gershen Written Submission 15-2-4.pdf

Date and Time Comment Was Submitted: 2015-02-24 12:07:33

No Duplicates.

**Comment 11 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Lisa

Last Name: Mortenson

Email Address: Non-web submitted comment

Affiliation: Community Fuels

Subject: Low Carbon Fuel Standard Re-adoption

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/82-lcfs2015-AW1TPFAiUWNQCQRp.pdf](http://www.arb.ca.gov/lists/com-attach/82-lcfs2015-AW1TPFAiUWNQCQRp.pdf)

Original File Name: Lisa Mortenson Written Submission 15-2-3.pdf

Date and Time Comment Was Submitted: 2015-02-24 12:52:14

No Duplicates.

## **Comment 12 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Joshua

Last Name: Willter

Email Address: Non-web submitted comment

Affiliation: Sierra Research

Subject: Growth Energy's Additional Exhibits to Comments Filed February 17, 2015

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/83-lcfs2015-AXYFcQZuV3BSIFM2.zip](http://www.arb.ca.gov/lists/com-attach/83-lcfs2015-AXYFcQZuV3BSIFM2.zip)

Original File Name: Written Submission #12 Received at the 02-19-2015 Board Hearing.zip

Date and Time Comment Was Submitted: 2015-03-04 14:24:23

No Duplicates.



## **Comment 13 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: John

Last Name: Kinsey

Email Address: Non-web submitted comment

Affiliation: Growth Energy

Subject: Proposed Amendments to the CA LCFS and ADF

Comment:

Please see attached.

A CD was also submitted along with this comment and is available upon request from the Clerk of the Board.

Attachment: [www.arb.ca.gov/lists/com-attach/168-lcfs2015-B21TOgFoBzoKU1A7.pdf](http://www.arb.ca.gov/lists/com-attach/168-lcfs2015-B21TOgFoBzoKU1A7.pdf)

Original File Name: John Kinsey 15-7-1 & 15-7-2.pdf

Date and Time Comment Was Submitted: 2015-09-28 09:54:31

No Duplicates.

## **Comment 14 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Bonnie

Last Name: Holmes-Gen

Email Address: Non-web submitted comment

Affiliation:

Subject: Health And Medical Support for LCFS

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/169-lcfs2015-BmRcNVc4Aj8HaFM2.pdf](http://www.arb.ca.gov/lists/com-attach/169-lcfs2015-BmRcNVc4Aj8HaFM2.pdf)

Original File Name: Bonnie Holmes-Gen 15-7-2.pdf

Date and Time Comment Was Submitted: 2015-09-28 09:54:31

No Duplicates.

## **Comment 15 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Gary

Last Name: Grimes

Email Address: Non-web submitted comment

Affiliation: Alon USA

Subject:

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/170-lcfs2015-UjUHYABzACoBWAnk.pdf](http://www.arb.ca.gov/lists/com-attach/170-lcfs2015-UjUHYABzACoBWAnk.pdf)

Original File Name: Gary Grimes 15-7-2.pdf

Date and Time Comment Was Submitted: 2015-09-28 09:54:31

No Duplicates.

## **Comment 16 for Low Carbon Fuel Standard 2015 (lcfs2015). (At Hearing)**

First Name: Tim

Last Name: Taylor

Email Address: Non-web submitted comment

Affiliation: Airlines 4 America

Subject: Statement of Airlines for America

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/171-lcfs2015-USVSPVQ4Ag4Acgdm.pdf](http://www.arb.ca.gov/lists/com-attach/171-lcfs2015-USVSPVQ4Ag4Acgdm.pdf)

Original File Name: Tim Taylor 15-7-2.pdf

Date and Time Comment Was Submitted: 2015-09-28 09:54:31

No Duplicates.

## **Comment 1 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: F. Kent  
Last Name: Leacock  
Email Address: kleacock@comcast.net  
Affiliation: Proterra

Subject: Low Carbon Fuel Standard Energy Economy Ratio Update  
Comment:

Please see our comment attached.

Attachment: [www.arb.ca.gov/lists/com-attach/84-lcfs2015-BWlcNVAmAw9XMgRl.pdf](http://www.arb.ca.gov/lists/com-attach/84-lcfs2015-BWlcNVAmAw9XMgRl.pdf)

Original File Name: Low Carbon Fuel Standard Comments\_Proterra\_June 2015.pdf

Date and Time Comment Was Submitted: 2015-06-04 17:42:40

No Duplicates.

## **Comment 2 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Elon  
Last Name: Rubin  
Email Address: elon@evcredits.com  
Affiliation: Beyond Energy

Subject: Proposed Readoption of and Modified Regulation Order to the Low Carbon Fuel Standard

Comment:

Dear Madams and Sirs:

We appreciate this opportunity to comment on the Air Resources Board's ("ARB") proposed readoption of and modified regulation order to the Low Carbon Fuel Standard. Attached in PDF format please find our comment.

We very much welcome ARB's comments, are available to answer any questions ARB may have on these comments, and respectfully request setting up a meeting with staff as soon as practicable.

Respectfully submitted,

Elon D. Rubin, Esq.

Attachment: [www.arb.ca.gov/lists/com-attach/86-lcfs2015-UzECYV0lVWkDa1M3.pdf](http://www.arb.ca.gov/lists/com-attach/86-lcfs2015-UzECYV0lVWkDa1M3.pdf)

Original File Name: Beyond Energy Comments Proposed Readoption of and Modified Regulation Order to the Low Carbon Fuel Standard.pdf

Date and Time Comment Was Submitted: 2015-06-09 12:26:09

No Duplicates.

### **Comment 3 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Rocky

Last Name: Elgie

Email Address: rocky.elgie@bnsf.com

Affiliation:

Subject: Comments on LCFS reauthorization

Comment:

Comments to LCFS reauthorization in attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/87-lcfs2015-VztVMFYxUnIAWQJh.pdf](http://www.arb.ca.gov/lists/com-attach/87-lcfs2015-VztVMFYxUnIAWQJh.pdf)

Original File Name: LCFS Comments.pdf

Date and Time Comment Was Submitted: 2015-06-16 14:31:31

No Duplicates.

## **Comment 4 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: John

Last Name: O'Donnell

Email Address: john@glasspoint.com

Affiliation: GlassPoint Solar

Subject: Innovative Crude Provision Comments

Comment:

Please find attached GlassPoint Solar's comments on the LCFS's 15-day regulatory package and final language.

Attachment: [www.arb.ca.gov/lists/com-attach/88-lcfs2015-Wj1dNwRkBycEcVIi.pdf](http://www.arb.ca.gov/lists/com-attach/88-lcfs2015-Wj1dNwRkBycEcVIi.pdf)

Original File Name: GlassPoint LCFS 15 day Comment Letter.pdf

Date and Time Comment Was Submitted: 2015-06-16 16:01:02

No Duplicates.



## **Comment 5 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Tom

Last Name: Koehler

Email Address: tomk@pacificethanol.net

Affiliation:

Subject: CI of denaturaunt

Comment:

The denaturaunt used by domestic ethanol producers is Natrual Gasoline. This product has a lower CI than CARBOB. Brazilian Ethanol marketers use CARBOB for their denaturant. There should be a new default pathway for domestic ethanol denaturuant reflecting the use of Natural Gasoline.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-06-17 10:17:26

No Duplicates.

## **Comment 6 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Senator Andy Vidak  
Last Name: Senator Jean Fuller  
Email Address: Senator.Vidak@senate.ca.gov  
Affiliation:

Subject: Comments on Low Carbon Fuel Standard's (LCFS) provisions for Low Complexity – Low Energy ( Comment:

June 17, 2015

The Honorable Mary Nichols, Chairwoman  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: Comments on Low Carbon Fuel Standard's (LCFS) provisions for Low Complexity – Low Energy (LCLE) Refiners

Thank you for allowing us to provide our comments on the Low Carbon Fuel Standard's (LCFS) provisions for Low Complexity – Low Energy (LCLE) Refiners. These provisions recognize that not all refineries are the same. We believe that there are policy and technical justifications for a distinction in the LCFS. The Air Resources Board, as well as, the U.S. Environmental Protection Agency has traditionally recognized the unique value small refineries occupy in the oil and finished fuel markets, as well as, their unique configurations and operating constraints.

Given the value of LCLE Refiners, we were concerned that the proposed final regulatory proposal for the re-adoption of California's LCFS fails to recognize Alon's Bakersfield Refinery as a LCLE producer. The facility is configured and engineered to produce low carbon intensive base fuels. Board staff had an opportunity to make the LCFS's LCLE provisions work for all low carbon intensity refineries in California, but decided against various compromise proposals presented, including proposals to limit the benefit any single LCLE refiner could receive.

As the final LCFS regulation is before you, we ask that the Board please look again at the value of all LCLE refineries and the benefits that they provide to the state. Thank you again for allowing us to provide our comments on the re-adoption of the LCFS.

Sincerely,

ANDY VIDAK  
Senator, 14th District

JEAN FULLER,  
Senator, 16th District

Attachment: [www.arb.ca.gov/lists/com-attach/90-lcfs2015-VWdUYgY2BGIAKAc3.pdf](http://www.arb.ca.gov/lists/com-attach/90-lcfs2015-VWdUYgY2BGIAKAc3.pdf)

Original File Name: 2015.06.17 Alon LCFS LCLE.PDF

Date and Time Comment Was Submitted: 2015-06-17 11:42:00

No Duplicates.

## **Comment 7 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Jim

Last Name: Elrod

Email Address: jim@ibew428.org

Affiliation:

Subject: Comments on the 15 Day Regulatory Package for the LCFS Regulation

Comment:

Please see attached letter.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/91-lcfs2015-UzBTNF0uAEDWgZq.pdf](http://www.arb.ca.gov/lists/com-attach/91-lcfs2015-UzBTNF0uAEDWgZq.pdf)

Original File Name: CARB Letter.pdf

Date and Time Comment Was Submitted: 2015-06-18 11:44:27

No Duplicates.

## **Comment 8 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Steven

Last Name: Gomez

Email Address: lu460@sbcglobal.net

Affiliation: Plumbers & Steamfitters Local Union 460

Subject: Alon Refinery

Comment:

Please see attachment

Attachment: [www.arb.ca.gov/lists/com-attach/92-lcfs2015-B2RRNIQnAzIHXgBs.pdf](http://www.arb.ca.gov/lists/com-attach/92-lcfs2015-B2RRNIQnAzIHXgBs.pdf)

Original File Name: CARB Letter 2015.pdf

Date and Time Comment Was Submitted: 2015-06-18 16:25:25

No Duplicates.

## **Comment 9 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Gary  
Last Name: Grimes  
Email Address: ggrimes@ppcla.com  
Affiliation: Paramount Petroleum

Subject: Comments from Alon USA  
Comment:

Attached are our comments.

Attachment: [www.arb.ca.gov/lists/com-attach/93-lcfs2015-BWRcNlc5WGVWD1A8.pdf](http://www.arb.ca.gov/lists/com-attach/93-lcfs2015-BWRcNlc5WGVWD1A8.pdf)

Original File Name: Alon LCFS 15 Day Comment Letter 6-19-15.pdf

Date and Time Comment Was Submitted: 2015-06-18 19:14:51

No Duplicates.

## **Comment 10 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Shelby

Last Name: Neal

Email Address: sneal@biodiesel.org

Affiliation: National Biodiesel Board

Subject: NBB Comments on LCFS Re-adoption

Comment:

Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/94-lcfs2015-VztQNVQzUnICWwVm.docx](http://www.arb.ca.gov/lists/com-attach/94-lcfs2015-VztQNVQzUnICWwVm.docx)

Original File Name: LCFS Comments Final 6-18-15.docx

Date and Time Comment Was Submitted: 2015-06-18 21:30:33

No Duplicates.

## **Comment 11 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Christopher  
Last Name: Hessler  
Email Address: chessler@ajw-inc.com  
Affiliation: AJW, Inc.

Subject: LCFS2015  
Comment:

Please see attached letter. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/95-lcfs2015-BjdQY1RIBGECNQc+.pdf](http://www.arb.ca.gov/lists/com-attach/95-lcfs2015-BjdQY1RIBGECNQc+.pdf)

Original File Name: 150619 15day RH clarification doc.pdf

Date and Time Comment Was Submitted: 2015-06-19 06:46:26

No Duplicates.



## **Comment 12 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Elena

Last Name: Guilfoil

Email Address: ksideco@arb.ca.gov

Affiliation: Washington State Department of Ecology

Subject: suggestion

Comment:

see attached

Attachment: [www.arb.ca.gov/lists/com-attach/96-lcfs2015-BmNQNQN7U18FXFMg.pdf](http://www.arb.ca.gov/lists/com-attach/96-lcfs2015-BmNQNQN7U18FXFMg.pdf)

Original File Name: ECY\_ suggestion.pdf

Date and Time Comment Was Submitted: 2015-06-19 08:15:29

No Duplicates.

## **Comment 13 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Eileen  
Last Name: Tutt  
Email Address: ksideco@arb.ca.gov  
Affiliation: CalETC

Subject: LCFS Regulation  
Comment:

see attached

Attachment: [www.arb.ca.gov/lists/com-attach/98-lcfs2015-VjVUMwRpWW8LeQhr.pdf](http://www.arb.ca.gov/lists/com-attach/98-lcfs2015-VjVUMwRpWW8LeQhr.pdf)

Original File Name: CalETC\_LCFS regulation.pdf

Date and Time Comment Was Submitted: 2015-06-19 09:16:18

No Duplicates.

## **Comment 14 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Jon

Last Name: Costantino

Email Address: ksideco@arb.ca.gov

Affiliation: Manatt, Phelps & Phillips, LLP

Subject: 95849 typo

Comment:

see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/99-lcfs2015-VzoGYV0yVGYBcwRw.pdf](http://www.arb.ca.gov/lists/com-attach/99-lcfs2015-VzoGYV0yVGYBcwRw.pdf)

Original File Name: Manatt\_ 95849 typo.pdf

Date and Time Comment Was Submitted: 2015-06-19 09:26:48

No Duplicates.

## **Comment 15 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Tom  
Last Name: Darlington  
Email Address: ksideco@arb.ca.gov  
Affiliation: POET

Subject: Conference call on records needed  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/100-lcfs2015-VydQOVUxWX4KU1U2.pdf](http://www.arb.ca.gov/lists/com-attach/100-lcfs2015-VydQOVUxWX4KU1U2.pdf)

Original File Name: POET\_Conference call on records needed.pdf

Date and Time Comment Was Submitted: 2015-06-19 10:55:21

No Duplicates.

## **Comment 16 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Tom  
Last Name: Darlington  
Email Address: ksideco@arb.ca.gov  
Affiliation: POET

Subject: guidance  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/101-lcfs2015-UCBXPlczV3AHXgZZ.pdf](http://www.arb.ca.gov/lists/com-attach/101-lcfs2015-UCBXPlczV3AHXgZZ.pdf)

Original File Name: POET\_ guidance.pdf

Date and Time Comment Was Submitted: 2015-06-19 11:08:00

No Duplicates.

**Comment 17 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Logan

Last Name: Caldwell

Email Address: LC@HBIOC.NET

Affiliation: Houston BioFuels Consultants LLC

Subject: Comments on LCFS 15-day Notice

Comment:

Attached please find a zip folder with five files containing comments pertaining to the documentation of Tier 1 Application Input Data

Attachment: [www.arb.ca.gov/lists/com-attach/102-lcfs2015-UiZQPwZiVndWD1Jj.zip](http://www.arb.ca.gov/lists/com-attach/102-lcfs2015-UiZQPwZiVndWD1Jj.zip)

Original File Name: Tier 1 Input Data Documentation Comments 19Jun15.zip

Date and Time Comment Was Submitted: 2015-06-19 10:15:26

No Duplicates.

## **Comment 18 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Todd  
Last Name: Campbell  
Email Address: ksideco@arb.ca.gov  
Affiliation: Clean Energy Fuels

Subject: Memo addressing CE's concerns and need for clarification on the 15 Day Proposed Regulation

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/103-lcfs2015-BmVcNgBkVGZVPQZZ.pdf](http://www.arb.ca.gov/lists/com-attach/103-lcfs2015-BmVcNgBkVGZVPQZZ.pdf)

Original File Name: Clean Energy\_Memo.pdf

Date and Time Comment Was Submitted: 2015-06-19 11:29:27

No Duplicates.

## **Comment 19 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Elena

Last Name: Guilfoil

Email Address: ksideco@arb.ca.gov

Affiliation: Washington State Department of Ecology

Subject: Typo

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/104-lcfs2015-VjNcOQB4Ag4EdgN6.pdf](http://www.arb.ca.gov/lists/com-attach/104-lcfs2015-VjNcOQB4Ag4EdgN6.pdf)

Original File Name: ECY\_typo.pdf

Date and Time Comment Was Submitted: 2015-06-19 12:00:40

No Duplicates.



## **Comment 20 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Philip

Last Name: Guillemette

Email Address: ksideco@arb.ca.gov

Affiliation: Flint Hills Resources, LP

Subject: ARB Proposed Regulation 95488(d)(2) Provisional Pathways - Question  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/105-lcfs2015-VzEGbFw0WGUEdII6.pdf](http://www.arb.ca.gov/lists/com-attach/105-lcfs2015-VzEGbFw0WGUEdII6.pdf)

Original File Name: FlintHills\_95488.pdf

Date and Time Comment Was Submitted: 2015-06-19 12:15:23

No Duplicates.

## **Comment 21 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Rob  
Last Name: Del Core  
Email Address: rdelcore@hydrogenics.com  
Affiliation:

Subject: Comment on LCFS  
Comment:

To Clerk of the Board, thank you very much for the opportunity to submit our comments. Please see comments attached.  
Sincerely,  
Rob Del Core  
Hydrogenics USA.

Attachment: [www.arb.ca.gov/lists/com-attach/106-lcfs2015-AmpdIII3VXQLYgVi.pdf](http://www.arb.ca.gov/lists/com-attach/106-lcfs2015-AmpdIII3VXQLYgVi.pdf)

Original File Name: Hydrogenics LCFS Comments (2015).pdf

Date and Time Comment Was Submitted: 2015-06-19 12:20:35

No Duplicates.

## **Comment 22 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Evan

Last Name: Edgar

Email Address: [evan@edgarinc.org](mailto:evan@edgarinc.org)

Affiliation: Efgar & Associates

Subject: CIs and EERs - Support with one page chart

Comment:

CARB:

We have participated in and supported the CI pathways for HSAD.

Edgar & Associates, Inc. has produced the attached table taking the new CIs and EERs and placed them in one place to compare life-cycle and economic efficiencies of transportation fuels.

CARB staff should produce a similar graph for all stakeholders to use.

Thanks

Evan

Attachment: [www.arb.ca.gov/lists/com-attach/107-lcfs2015-UTQGYQBeAjIFYgJw.pdf](http://www.arb.ca.gov/lists/com-attach/107-lcfs2015-UTQGYQBeAjIFYgJw.pdf)

Original File Name: EA Carbon Intensity Graph Handout 1.pdf

Date and Time Comment Was Submitted: 2015-06-19 13:04:56

No Duplicates.

## **Comment 23 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: John

Last Name: Duff

Email Address: john@sorghumgrowers.com

Affiliation: National Sorghum Producers

Subject: LCFS re-adoption comments

Comment:

Please see our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/108-lcfs2015-WjwGaVU6WGoHbQNc.docx](http://www.arb.ca.gov/lists/com-attach/108-lcfs2015-WjwGaVU6WGoHbQNc.docx)

Original File Name: final\_readoption\_comments.docx

Date and Time Comment Was Submitted: 2015-06-19 13:03:58

No Duplicates.

## **Comment 24 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Jennifer

Last Name: Pont

Email Address: ksideco@arb.ca.gov

Affiliation: Life Cycle Associates, LLC

Subject: Question about proposed provisional pathway language

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/109-lcfs2015-VDgAZVQ0VSsFcgRx.pdf](http://www.arb.ca.gov/lists/com-attach/109-lcfs2015-VDgAZVQ0VSsFcgRx.pdf)

Original File Name: LCA-Question\_about\_proposed\_provisional\_pathway\_language.pdf

Date and Time Comment Was Submitted: 2015-06-19 13:12:13

No Duplicates.

**Comment 25 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Logan

Last Name: Caldwell

Email Address: ksideco@arb.ca.gov

Affiliation: Houston BioFuels Consultants LLC

Subject: Documenting DGS Yield per gallon of ethanol production

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/110-lcfs2015-Vz8AaQB0UHBWJFU6.pdf](http://www.arb.ca.gov/lists/com-attach/110-lcfs2015-Vz8AaQB0UHBWJFU6.pdf)

Original File Name: HoustonBiofuels\_Documenting DGS Yield per gallon of ethanol.pdf

Date and Time Comment Was Submitted: 2015-06-19 13:25:28

No Duplicates.

## **Comment 26 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Bryce  
Last Name: Meeker  
Email Address: [bmeecker@mrgkc.com](mailto:bmeecker@mrgkc.com)  
Affiliation: AltEn, LLC

Subject: Lagoon Emissions Modeling  
Comment:

June 19th, 2015

California Air Resources Board  
Transportation Fuels Branch, SSD  
Fuels Evaluation Section  
1001 I Street  
Sacramento, CA 95814

Re: Comments on Calculating GHG Reduction Credits for the  
Displacement of an Open Anaerobic Lagoon with an Anaerobic  
Digester

Dear CARB Staff,

We are submitting comments regarding the credits assigned to methane emissions from an open anaerobic waste treatment lagoons. The conversion of these operations into anaerobic digestion facilities represents a significant reduction in methane emissions from these operations as methane that was emitted to the atmosphere is captured (with the exception of fugitive emissions). Correctly accounting the credits these operations receive will have an impact on whether or not open anaerobic lagoons will be converted and will divert methane from the atmosphere.

Methane is a potent greenhouse gas that has 25 times higher global warming potential than carbon dioxide, and has been generated from anaerobic waste lagoons and emitted directly to the atmosphere at many cattle operations across the country. Diverting the manure created at these facilities to an anaerobic digester avoids releasing methane emissions to the atmosphere, and reduces the negative impact of these facilities. Therefore, we believe the avoided methane emissions should be counted as a credit towards the biogas produced from anaerobic digesters used to replace these open lagoons.

The current methodology adopted by CARB and Argonne National Laboratory for the analysis of anaerobic digestion-based renewable natural gas (RNG) production assumes that CH<sub>4</sub> generated is flared, and that the resulting CO<sub>2</sub> emissions and fugitive methane are the only credits received by the biogas produced by the digester. This assumed baseline is reasonable because the original destination of these wastes would be a landfill where the collection and flaring of biogas is feasible and has already been implemented.

However, in most current open anaerobic lagoon systems, no biogas is being collected. Furthermore, once the biogas is collected from a covered lagoon and/or a bio-digester, the biogas will likely be sold or used for on-site energy generation. It is highly unlikely that biogas collected would be flared after the capital and operational costs have been put into the facility to capture and use the gas.

In a report published by US EPA in 2010, of the 157 digester projects operating on commercial scale livestock facilities, only 15 (or 9.6%) were flaring the biogas full time . Based on this information, it is at least questionable that the flaring of biogas should be used as a reference case since it does not reflect actual operations at a high percentage of digester projects.

We believe the reference case for calculating the avoided methane emissions should be that all the biogas generated from the open anaerobic lagoon is fugitive to the atmosphere. Consequently, the CH<sub>4</sub> emissions captured by the anaerobic digester should be accounted for as credits in the GREET model.

We would like to encourage you to take this into consideration when finalizing the GREET 2.0 model to allow for reductions based on the methane emissions that are captured and utilized. This will allow for better accounting and encourage reducing ghg emissions from these operations, and from other emerging technologies.

Thank you for the opportunity to submit these comments and to participate in the re-adoption of the LCFS. Please let us know if you need any additional information or have any questions on the above points!

Sincerely,

Dennis M. Langley  
President  
AltEn, LLC  
1344 County Road 10  
Mead, NE, 68041

Attachment: [www.arb.ca.gov/lists/com-attach/111-lcfs2015-BmcBawF0BDIBaVUK.pdf](http://www.arb.ca.gov/lists/com-attach/111-lcfs2015-BmcBawF0BDIBaVUK.pdf)

Original File Name: AltEn\_Comments on Lagoon Emissions Modeling\_19June2015.pdf

Date and Time Comment Was Submitted: 2015-06-19 13:18:34

No Duplicates.



## **Comment 27 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Jan

Last Name: Koninckx

Email Address: Jan.Koninckx@dupont.com

Affiliation:

Subject: DuPont comments on Proposed Modified Text for LCFS Re-Adoption

Comment:

DuPont respectfully submits the attached comments.

Best Regards,

Jan Koninckx

Global Business Director, Biorefineries

Attachment: [www.arb.ca.gov/lists/com-attach/112-lcfs2015-AGQAcwNyADwHb1Im.pdf](http://www.arb.ca.gov/lists/com-attach/112-lcfs2015-AGQAcwNyADwHb1Im.pdf)

Original File Name: DuPont\_ReadoptRegs\_LCFS\_061915.pdf

Date and Time Comment Was Submitted: 2015-06-19 13:37:33

No Duplicates.

## **Comment 28 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Logan

Last Name: Caldwell

Email Address: ksideco@arb.ca.gov

Affiliation: Houston BioFuels Consultants LLC

Subject: Documenting ethanol transportation from the Production Facility to the California Blending

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/113-lcfs2015-WjIGb1UhVHRQIgdo.pdf](http://www.arb.ca.gov/lists/com-attach/113-lcfs2015-WjIGb1UhVHRQIgdo.pdf)

Original File Name: HoustonBiofuels\_Documenting ethanol transportation.pdf

Date and Time Comment Was Submitted: 2015-06-19 13:38:30

No Duplicates.

## **Comment 29 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Logan

Last Name: Caldwell

Email Address: ksideco@arb.ca.gov

Affiliation: Houston BioFuels Consultants LLC

Subject: Documenting Tier 1 Ethanol Pathway chemical, enzyme and yeast use

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/114-lcfs2015-Vz9TOgZyAiILeVc4.pdf](http://www.arb.ca.gov/lists/com-attach/114-lcfs2015-Vz9TOgZyAiILeVc4.pdf)

Original File Name: HoustonBiofuels\_Documenting Tier 1 Ethanol Pathway chemical.pdf

Date and Time Comment Was Submitted: 2015-06-19 13:46:18

No Duplicates.

**Comment 30 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Logan

Last Name: Caldwell

Email Address: ksideco@arb.ca.gov

Affiliation: Houston BioFuels Consultants LLC

Subject: Documenting transportation distances and mode for Tier 1 applications

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/116-lcfs2015-Bm5TOIAkV3dVJ1c4.pdf](http://www.arb.ca.gov/lists/com-attach/116-lcfs2015-Bm5TOIAkV3dVJ1c4.pdf)

Original File Name: HoustonBiofuels\_ Documenting transportation distances.pdf

Date and Time Comment Was Submitted: 2015-06-19 13:52:22

No Duplicates.

## **Comment 31 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Lisa  
Last Name: Draney  
Email Address: ldraney@murexltd.com  
Affiliation: Murex LLC

Subject: Comment on Provisional Pathways  
Comment:

Thank you for the opportunity to comment. Please see attached comments on the proposed changes regarding provisional pathways on facilities that have been in operation for less than two years.

Attachment: [www.arb.ca.gov/lists/com-attach/117-lcfs2015-WmoCMgcoVjRRbgEv.pdf](http://www.arb.ca.gov/lists/com-attach/117-lcfs2015-WmoCMgcoVjRRbgEv.pdf)

Original File Name: 06.19.15 LCFS Proposed Changes Comment.pdf

Date and Time Comment Was Submitted: 2015-06-19 13:51:11

No Duplicates.

## **Comment 32 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Logan

Last Name: Caldwell

Email Address: ksideco@arb.ca.gov

Affiliation: Houston BioFuels Consultants LLC

Subject: Definition and Qualifications of an Independent, Third Party Auditor?

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/118-lcfs2015-VT1QOVwoBSUHdQRr.pdf](http://www.arb.ca.gov/lists/com-attach/118-lcfs2015-VT1QOVwoBSUHdQRr.pdf)

Original File Name: HoustonBiofuels\_Definition and Qualifications.pdf

Date and Time Comment Was Submitted: 2015-06-19 13:55:42

No Duplicates.

## **Comment 33 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Gus

Last Name: Block

Email Address: gblock@nuvera.com

Affiliation: Nuvera Fuel Cells

Subject: LCFS Credit Proposal

Comment:

Nuvera Fuel Cells is a provider of fuel cell systems for mobility applications and of hydrogen generation and refueling equipment. The company is owned by NACCO Materials Handling Group, a global manufacturer of industrial vehicles, including Hyster(R) and Yale(R) brand forklift trucks.

Nuvera endorses the proposed inclusion of hydrogen fuel for fuel cell-powered forklifts as a means for generating LCFS credits. We also propose extending the application beyond forklifts to other industrial vehicles, such as ground support equipment, transport refrigeration, and container handling equipment. These measures will help drive the adoption of low carbon fuel alternatives within California's large industrial vehicle sector, which includes distribution centers, warehouses, manufacturing facilities, ports, and other venues that are concentrated emissions sources.

Nuvera advises against the adoption of the proposed Provisional Credit clause that would allow companies to earn provisional LCFS credits but would not allow them to be traded for two years. This provision would be a significant disincentive for prospective producers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-06-19 13:57:04

No Duplicates.

## **Comment 34 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Philip

Last Name: Guillemette

Email Address: philip.guillemette@fhr.com

Affiliation: Flint Hills Resources

Subject: Provisional Pathway Provision

Comment:

See attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/120-lcfs2015-Am5UMVA3BSULUgl5.pdf](http://www.arb.ca.gov/lists/com-attach/120-lcfs2015-Am5UMVA3BSULUgl5.pdf)

Original File Name: LCFS Proposed Rule Comments.pdf

Date and Time Comment Was Submitted: 2015-06-19 14:04:15

No Duplicates.



## **Comment 35 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Tim  
Last Name: Carmichael  
Email Address: [tim@cngvc.org](mailto:tim@cngvc.org)  
Affiliation: California Natural Gas Vehicle Coalition

Subject: Comments on Proposed 15-Day Regulation Order for the Low-Carbon Fuel Standard  
Comment:

Dear Executive Officer Corey:

The California Natural Gas Vehicle Coalition (CNGVC), NGVAmerica (NGVA), and the Coalition for Renewable Natural Gas (RNGC) are pleased to provide these joint comments regarding ARB's proposed re-adoption of the Low Carbon Fuel Standard (LCFS) regulation. Specifically, this letter provides our detailed joint comments on ARB's "Attachment A: Proposed 15-Day Regulation Order," which was released for public comment on June 4, 2015.

Thank you for the opportunity to comment. If we can provide additional information, please contact any of us.

Sincerely,  
Tim Carmichael

Attachment: [www.arb.ca.gov/lists/com-attach/122-lcfs2015-W2oBMgEtUmUFYlAp.pdf](http://www.arb.ca.gov/lists/com-attach/122-lcfs2015-W2oBMgEtUmUFYlAp.pdf)

Original File Name: 15-day Comment Letter to Richard Corey June 19 2015\_Final.pdf

Date and Time Comment Was Submitted: 2015-06-19 14:02:32

No Duplicates.

**Comment 36 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Logan

Last Name: Caldwell

Email Address: ksideco@arb.ca.gov

Affiliation: Houston BioFuels Consultants LLC

Subject: Use of Revised CI values prior to recertification?

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/123-lcfs2015-Bm5ROAdzU3NSIFM8.pdf](http://www.arb.ca.gov/lists/com-attach/123-lcfs2015-Bm5ROAdzU3NSIFM8.pdf)

Original File Name: HoustonBiofuels-Use\_of\_Revised\_CI\_values.pdf

Date and Time Comment Was Submitted: 2015-06-19 14:10:20

No Duplicates.

**Comment 37 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Logan

Last Name: Caldwell

Email Address: ksideco@arb.ca.gov

Affiliation: Houston BioFuels Consultants LLC

Subject: Exclusion from Resubmitting Lifecycle Analysis for Existing Tier 1 Pathways?

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/125-lcfs2015-Bm4FbFcjVXULeQdo.pdf](http://www.arb.ca.gov/lists/com-attach/125-lcfs2015-Bm4FbFcjVXULeQdo.pdf)

Original File Name: HoustonBiofuels-Exclusion\_from\_Resubmitting\_LCA.pdf

Date and Time Comment Was Submitted: 2015-06-19 14:19:40

No Duplicates.

**Comment 38 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Logan

Last Name: Caldwell

Email Address: ksideco@arb.ca.gov

Affiliation: Houston BioFuels Consultants LLC

Subject: Batch processing applications

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/126-lcfs2015-WzNROFwoAyMEdgRr.pdf](http://www.arb.ca.gov/lists/com-attach/126-lcfs2015-WzNROFwoAyMEdgRr.pdf)

Original File Name: HoustonBiofuels\_Batch processing applications.pdf

Date and Time Comment Was Submitted: 2015-06-19 14:25:02

No Duplicates.

**Comment 39 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Leticia  
Last Name: Phillips  
Email Address: ksideco@arb.ca.gov  
Affiliation: UNICA

Subject: CA GREET 2.0 Comments - UNICA  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/127-lcfs2015-UjEBZIZ6BDACdgBl.pdf](http://www.arb.ca.gov/lists/com-attach/127-lcfs2015-UjEBZIZ6BDACdgBl.pdf)

Original File Name: CA-GREET2\_UNICA.pdf

Date and Time Comment Was Submitted: 2015-06-19 14:31:03

No Duplicates.

## **Comment 40 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Miles

Last Name: Heller

Email Address: miles.t.heller@tsocorp.com

Affiliation: Tesoro

Subject: Comments to LCFS 15-day package

Comment:

Tesoro appreciates the opportunity to submit our comments on the LCFS 15-day package.

Attachment: [www.arb.ca.gov/lists/com-attach/128-lcfs2015-UCRWNVMhVmpXI1Q7.pdf](http://www.arb.ca.gov/lists/com-attach/128-lcfs2015-UCRWNVMhVmpXI1Q7.pdf)

Original File Name: Tesoro 15-day package comments LCFS 6-19-15.pdf

Date and Time Comment Was Submitted: 2015-06-19 14:50:52

No Duplicates.

## **Comment 41 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Anne

Last Name: Smart

Email Address: anne.smart@chargepoint.com

Affiliation:

Subject: ChargePoint Comments on Proposed Changes

Comment:

We appreciate this opportunity to provide the comments of ChargePoint, Inc. (ChargePoint) on proposed changes to the regulations governing California's Low Carbon Fuel Standard (LCFS) issued on June 4, 2015 pursuant to the Notice of Public Availability of Modified Text and Availability of Additional Documents and Information (Notice) relating to the Proposed Re-Adoption of the LCFS. We strongly support the goals of the LCFS program, and recognize the California Air Resources Board (ARB) as a national leader in implementing this important program as part of the state's larger effort to reduce the carbon intensity of transportation fuels and decrease greenhouse gas (GHG) emissions for the benefit of all Californians. For the reasons discussed in our attached comments, ChargePoint urges you to modify the proposed changes in the regulations addressing requirements for Regulated Parties for Electricity.

Attachment: [www.arb.ca.gov/lists/com-attach/129-lcfs2015-Uz9cOQBnBSULUgZl.pdf](http://www.arb.ca.gov/lists/com-attach/129-lcfs2015-Uz9cOQBnBSULUgZl.pdf)

Original File Name: LCFS ChargePoint Comments June 19 2015.pdf

Date and Time Comment Was Submitted: 2015-06-19 14:51:34

No Duplicates.

**Comment 42 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: John  
Last Name: Van de North  
Email Address: [jvandenorth@nexsteppe.com](mailto:jvandenorth@nexsteppe.com)  
Affiliation: NexSteppe Inc.

Subject: Comments to Proposed Re-Adoption of the LCFS  
Comment:

Dear Mr. Wade,

Please see our attached comments.

Best regards,

John Van de North  
NexSteppe Inc.

Attachment: [www.arb.ca.gov/lists/com-attach/130-lcfs2015-BWtTMFMqV3cDcQdi.docx](http://www.arb.ca.gov/lists/com-attach/130-lcfs2015-BWtTMFMqV3cDcQdi.docx)

Original File Name: NexSteppe LCFS Comments June 19 2015 (1).docx

Date and Time Comment Was Submitted: 2015-06-19 15:10:09

No Duplicates.



**Comment 43 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Catherine  
Last Name: Reheis Boyd  
Email Address: joey@wspa.org  
Affiliation: WSPA

Subject: Proposed Re-Adoption of the LCFS  
Comment:

Please see attached Proposed Re-Adoption of the Low Carbon Fuel Standard Notice of Public Availability of Modified Text and Availability of Additional Documents and Information.  
Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/131-lcfs2015-ViFRJFQIAjBRCANg.pdf](http://www.arb.ca.gov/lists/com-attach/131-lcfs2015-ViFRJFQIAjBRCANg.pdf)

Original File Name: WSPA Comments on CARB LCFS 15 day Package final 61915.pdf

Date and Time Comment Was Submitted: 2015-06-19 15:27:36

No Duplicates.

## **Comment 44 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Jessica  
Last Name: Hoffmann  
Email Address: [jwhoffmann@rpmglc.com](mailto:jwhoffmann@rpmglc.com)  
Affiliation: RPMG, Inc.

Subject: RPMG Comments on Proposed Re-adoption of the Low Carbon Fuel Standard  
Comment:

RPMG Comments on Proposed Re-adoption of the Low Carbon Fuel Standard attached.

Attachment: [www.arb.ca.gov/lists/com-attach/132-lcfs2015-ViQFc1I+WGwHXIVk.pdf](http://www.arb.ca.gov/lists/com-attach/132-lcfs2015-ViQFc1I+WGwHXIVk.pdf)

Original File Name: RPMG 15-day LCFS Re-adoption Comments.pdf

Date and Time Comment Was Submitted: 2015-06-19 15:27:48

No Duplicates.

## **Comment 45 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Joshua

Last Name: Willter

Email Address: [jwillter@sierraresearch.com](mailto:jwillter@sierraresearch.com)

Affiliation: Sierra Research

Subject: Growth Energy 15-Day Comments

Comment:

Growth Energy 15-Day Comments (1 zipped file containing):

- T. Darlington Declaration
- J. Lyons Declaration
- 15-Day Comments

Attachment: [www.arb.ca.gov/lists/com-attach/133-lcfs2015-UDdWIgBuU3cBc1I6R.zip](http://www.arb.ca.gov/lists/com-attach/133-lcfs2015-UDdWIgBuU3cBc1I6R.zip)

Original File Name: Growth Energy LCFS 15-Day Comments.zip

Date and Time Comment Was Submitted: 2015-06-19 15:45:06

No Duplicates.

## **Comment 46 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Rudy

Last Name: Salas

Email Address: Asssemblymember.Salas@asm.ca.gov

Affiliation:

Subject: LCLE CARB ltr

Comment:

Please revisit this issue.

Attachment: [www.arb.ca.gov/lists/com-attach/134-lcfs2015-UT0AZVM+AjRQCQVm.pdf](http://www.arb.ca.gov/lists/com-attach/134-lcfs2015-UT0AZVM+AjRQCQVm.pdf)

Original File Name: LCLE CARB Ltr.pdf

Date and Time Comment Was Submitted: 2015-06-19 15:42:34

No Duplicates.

## **Comment 47 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Jeremy

Last Name: Waen

Email Address: [jwaen@mcecleanenergy.org](mailto:jwaen@mcecleanenergy.org)

Affiliation: Marin Clean Energy

Subject: Comments Regarding the Low Carbon Fuel Standard 2015 15-1

Comment:

Please see the attached document for MCE's comments on this matter.

Attachment: [www.arb.ca.gov/lists/com-attach/135-lcfs2015-BjZcbFZ6UjAHOFB9.pdf](http://www.arb.ca.gov/lists/com-attach/135-lcfs2015-BjZcbFZ6UjAHOFB9.pdf)

Original File Name: 06-19-15 MCE Comments on LCFS 15-Day Regulation Order (FINAL).pdf

Date and Time Comment Was Submitted: 2015-06-19 15:55:55

No Duplicates.

## **Comment 48 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Carol  
Last Name: Tjong  
Email Address: ctjong@white-energy.com  
Affiliation: White Energy

Subject: Provisional Pathways  
Comment:

Please see attached letter. Thank you for allowing this feedback.

Attachment: [www.arb.ca.gov/lists/com-attach/136-lcfs2015-BTcGMAExVTNQeAMz.pdf](http://www.arb.ca.gov/lists/com-attach/136-lcfs2015-BTcGMAExVTNQeAMz.pdf)

Original File Name: 2015.06 White Energy comments on CARB 15-day Notice.pdf

Date and Time Comment Was Submitted: 2015-06-19 15:44:23

No Duplicates.

**Comment 49 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Melinda

Last Name: Hicks

Email Address: mhicks@kernoil.com

Affiliation: Kern Oil & Refining Co,

Subject: Comments on LCFS 15-day Proposed Order

Comment:

Thank you for the opportunity to provide comments. Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/137-lcfs2015-VD9VPFQnVloAaglq.pdf](http://www.arb.ca.gov/lists/com-attach/137-lcfs2015-VD9VPFQnVloAaglq.pdf)

Original File Name: KOR LCFS Readoption Comment Letter 6\_19\_15.pdf

Date and Time Comment Was Submitted: 2015-06-19 15:24:23

No Duplicates.

## **Comment 50 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Stephanie

Last Name: Batchelor

Email Address: sbatchelor@bio.org

Affiliation:

Subject: BIO Comments on LCFS re-adoption proposal

Comment:

Please don't hesitate to contact us with questions.

Attachment: [www.arb.ca.gov/lists/com-attach/138-lcfs2015-UjAAbwRqVloFYFc4.pdf](http://www.arb.ca.gov/lists/com-attach/138-lcfs2015-UjAAbwRqVloFYFc4.pdf)

Original File Name: BIO comments to CARB 06-19-2015.pdf

Date and Time Comment Was Submitted: 2015-06-19 15:56:05

No Duplicates.



## **Comment 51 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Will

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association in California

Subject: LCFS 2015

Comment:

Please see attached comments submitted on behalf of the American Lung Association in CA, NRDC and CEERT.

Attachment: [www.arb.ca.gov/lists/com-attach/139-lcfs2015-VTIUJ1E+VGAHXgBu.pdf](http://www.arb.ca.gov/lists/com-attach/139-lcfs2015-VTIUJ1E+VGAHXgBu.pdf)

Original File Name: Lung\_NRDC\_CEERT letter re LCFS 15 Day.pdf

Date and Time Comment Was Submitted: 2015-06-19 16:10:09

No Duplicates.

**Comment 52 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Jessica

Last Name: Hoffmann

Email Address: ksideco@arb.ca.gov

Affiliation: Renewable Products Marketing Group, LLC

Subject: RPMG Comments on Proposed Re-adoption of the Low Carbon Fuel Standard  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/140-lcfs2015-UCIFc1c7UWVVVDAk.pdf](http://www.arb.ca.gov/lists/com-attach/140-lcfs2015-UCIFc1c7UWVVVDAk.pdf)

Original File Name: RPMG Comments on Proposed Re-adoption of LCFS.pdf

Date and Time Comment Was Submitted: 2015-06-19 16:18:08

No Duplicates.

## **Comment 53 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Kevin  
Last Name: Lee  
Email Address: kevin.lee@nrg.com  
Affiliation: NRG EVgo

Subject: NRG EVgo comments to proposed amendments  
Comment:

June 19, 2015

Clerk of the Board  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Low Carbon Fuel Standard Program Amendments for Regulated  
Parties for Suppliers of Electricity Used as a Fuel Substitute.  
Dear Madam or Sir:

NRG EVgo ("EVgo") appreciates the opportunity to review and comment on the referenced amendments to the Low Carbon Fuel Standard Program as they affect suppliers of electricity used as a fuel supplement.

EVgo is a leading Electric Vehicle Services Provider ("EVSP") in the state of California seeking to grow the market for the future of California's EV drivers and the environment. EVgo has a multi-faceted business model engaged in expanding both private and public access EV charging infrastructure throughout California. As a company heavily engaged in the development of EV charging infrastructure, we believe the LCFS credit program can be beneficial to the continued expansion of our business operations and the growth of the EV market in California. The proposed amendments restrict the ability of EVSPs to generate credits to public access charging alone, which unnecessarily constrains incentives for EVSPs in expanding charging opportunities at multifamily dwellings and workplaces. The success of the EVSP industry hinges on the viability of a complete ecosystem of EV charging products covering: home, public access, workplace, and multifamily. EVgo would like to see the California Air Resources Board maximize credit generating opportunities for EVSPs across all public and private access chargers.

EVgo aims to enroll in the LCFS program shortly and looks forward to working closely with the California Air Resources Board to maximize EV adoption.

\*Generally, EVgo objects to the elimination of the general category "electricity services supplier" as a regulated party eligible for the full suite of credit generation opportunities.\*

The policy objectives supporting the use of electricity in the LCFS should incentivize all market participants to increase electrification and reduce carbon intensity. Restricting certain

categories of LCFS eligibility to Electrical Distribution Utilities creates a skewed playing field that unfairly favors utilities over private market participants such as EVSPs.

\*EVgo respectfully objects to the proposed language of § 95483(e)(1) for failing to include EVSPs as an eligible regulated party at single- or multi-family residences.\*

Expanding EV charging into multi-family residences is a critical component of EV adoption in California. EVgo's business model includes contracting with apartment communities to provide turnkey charging services to its residents. The ability to generate credits through these relationships would provide a significant incentive to increasing deployment. Owners of multi-family residences have generally been hesitant to invest in EV infrastructure and manage the authentication, networking, maintenance and billing activities needed to serve residents. Permitting EVSPs to generate credits through the provision of private access residential charging services would encourage further development and lead to more opportunities for EV drivers to charge their vehicles during off-peak hours.

EVgo requests that § 95483(e)(1) be amended to include verbiage similar to § 95483(e)(2) or § 95483(e)(4) (assuming "site host" would include EVSPs) such that EVSPs who have contractual relationships with property owners or managers to provide charging services are permitted to generate credits at single- and multi-family residences.

\*EVgo respectfully supports the proposed language of § 95483(e)(2) including EVSPs as an eligible regulated party at public access EV charging stations.\*

EVgo is investing heavily in public access EV charging stations across the state of California. Generating credits through the LCFS will enable us to expand our offerings and increase the pace of deployment. Additionally, the public education requirements align closely with many of EVgo's current programs and its ultimate business objectives.

\*EVgo respectfully requests clarification of the term "Site Host" in § 95483(e)(4) to include EVSPs in connection with business and workplace charging.\*

Workplace charging is an essential component of EV adoption in California. EVgo welcomes the opportunity to generate credits as the EVSP of private access charging stations at a business or workplace. The term "site host" should be clarified to include EVSPs who have contractual relationships with a business or property owner to provide charging services.

Attachment: [www.arb.ca.gov/lists/com-attach/141-lcfs2015-AW9cKFcxVVkCYQRy.pdf](http://www.arb.ca.gov/lists/com-attach/141-lcfs2015-AW9cKFcxVVkCYQRy.pdf)

Original File Name: NRG EVgo Comments on LCFS Proposed Amendments [FINAL].pdf

Date and Time Comment Was Submitted: 2015-06-19 16:29:00

No Duplicates.

## **Comment 54 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Bill  
Last Name: Elrick  
Email Address: belrick@cafcp.org  
Affiliation: CaFCP

Subject: CaFCP comments on suggested modifications Low Carbon Fuel Standard language  
Comment:

Dear Air Resources Board staff,

Find attached the CaFCP comments on the revised LCFS language as part of ARB's LCFS (June 2015) 15-day comment period.

Best regards,

Bill Elrick  
Executive Director  
California Fuel Cell Partnership

Attachment: [www.arb.ca.gov/lists/com-attach/142-lcfs2015-VzQAZwBnADAAdglW.pdf](http://www.arb.ca.gov/lists/com-attach/142-lcfs2015-VzQAZwBnADAAdglW.pdf)

Original File Name: CaFCP Letter\_LCFS\_15 Day Comments\_June2015.pdf

Date and Time Comment Was Submitted: 2015-06-19 16:33:09

No Duplicates.

**Comment 55 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Clarke

Last Name: Pauley

Email Address: [clarkep@crrmail.com](mailto:clarkep@crrmail.com)

Affiliation: CR&R Environmental Services

Subject: Comment Letter to Re-Adoption of the LCFS- 15 Day Regulation Order

Comment:

We are pleased to submit our comment letter pertaining to the above referenced proposed Regulation Order. If you have any questions, please feel free to contact us.

Best,

Clarke Pauley  
for Paul Relis

Attachment: [www.arb.ca.gov/lists/com-attach/143-lcfs2015-AWJRJVcJUnMHLAFt.pdf](http://www.arb.ca.gov/lists/com-attach/143-lcfs2015-AWJRJVcJUnMHLAFt.pdf)

Original File Name: CR&R-LCFS Readoption Comment Letter- Final.pdf

Date and Time Comment Was Submitted: 2015-06-19 16:40:08

No Duplicates.

**Comment 56 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Graham

Last Name: Ellis

Email Address: gellis@solazyme.com

Affiliation: Solazyme, Inc.

Subject: Solazyme Comments On The Proposed Re-Adoption of the LCFS

Comment:

Comments are in the attached PDF

Attachment: [www.arb.ca.gov/lists/com-attach/144-lcfs2015-VyRWP1Q5WGoLdwV8.pdf](http://www.arb.ca.gov/lists/com-attach/144-lcfs2015-VyRWP1Q5WGoLdwV8.pdf)

Original File Name: Solazyme Comments On Revised LCFS Rules.pdf

Date and Time Comment Was Submitted: 2015-06-19 16:29:00

No Duplicates.



**Comment 57 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Celia

Last Name: DuBose

Email Address: [celia.dubose@cabiodieselalliance.org](mailto:celia.dubose@cabiodieselalliance.org)

Affiliation: California Biodiesel Alliance

Subject: CBA Comments on LCFS 15-Day Modifications

Comment:

Attached comments for your considerations. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/145-lcfs2015-WjkHYwNjVloHYgNs.pdf](http://www.arb.ca.gov/lists/com-attach/145-lcfs2015-WjkHYwNjVloHYgNs.pdf)

Original File Name: CBA Comments\_LCFS 15 Day Modifications\_6.15.15.pdf

Date and Time Comment Was Submitted: 2015-06-19 16:54:24

No Duplicates.

**Comment 58 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: John

Last Name: Spaulding

Email Address: Non-web submitted comment

Affiliation:

Subject: Comments of the 15 Day Regulatory Package for the LCFS Regulation

Comment:

see attached

Attachment: [www.arb.ca.gov/lists/com-attach/146-lcfs2015-VjoHYlw7UnIFXANg.pdf](http://www.arb.ca.gov/lists/com-attach/146-lcfs2015-VjoHYlw7UnIFXANg.pdf)

Original File Name: LCFS\_Comment Letter.pdf

Date and Time Comment Was Submitted: 2015-06-24 09:36:14

No Duplicates.

**Comment 59 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-1.**

First Name: Eileen

Last Name: Tutt

Email Address: Non-web submitted comment

Affiliation: California Electric Transportation Coali

Subject: SUPPORT for Re-Adoption of the LCFS as modified by the proposed 15-da  
Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/154-lcfs2015-UTICZVc6UWcCcFc0.pdf](http://www.arb.ca.gov/lists/com-attach/154-lcfs2015-UTICZVc6UWcCcFc0.pdf)

Original File Name: CalETC Comments July CARB Board meeting FINAL.pdf

Date and Time Comment Was Submitted: 2015-07-02 14:02:14

No Duplicates.

## **Comment 1 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: Logan

Last Name: Caldwell

Email Address: ksideco@arb.ca.gov

Affiliation: Houston BioFuels Consultants LLC

Subject: Which "CI" is the reference for the 20% reduction Tier 2 requirement?

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/149-lcfs2015-AGgCa1cjBCRWJAZp.pdf](http://www.arb.ca.gov/lists/com-attach/149-lcfs2015-AGgCa1cjBCRWJAZp.pdf)

Original File Name: HoustonBiofuelsConsultant.pdf

Date and Time Comment Was Submitted: 2015-06-30 11:52:02

No Duplicates.

**Comment 2 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: Logan

Last Name: Caldwell

Email Address: ksideco@arb.ca.gov

Affiliation: Houston BioFuels Consultants LLC

Subject: Assertion in 2nd Notice Summary that no data needed for many legacy pathways

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/150-lcfs2015-UTkHYwNhAAwHYAZ1.pdf](http://www.arb.ca.gov/lists/com-attach/150-lcfs2015-UTkHYwNhAAwHYAZ1.pdf)

Original File Name: HBC\_Assertion in 2nd Notice Summary.pdf

Date and Time Comment Was Submitted: 2015-06-30 13:02:34

No Duplicates.

### **Comment 3 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: Logan

Last Name: Caldwell

Email Address: ksideco@arb.ca.gov

Affiliation: Houston BioFuels Consultants LLC

Subject: What is the Executive Officer likely to request for Recertifications

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/152-lcfs2015-UDgCZgFjV1sDcghg.pdf](http://www.arb.ca.gov/lists/com-attach/152-lcfs2015-UDgCZgFjV1sDcghg.pdf)

Original File Name: HBC\_What is the Executive Officerer.pdf

Date and Time Comment Was Submitted: 2015-06-30 13:27:03

No Duplicates.

## **Comment 4 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: Logan

Last Name: Caldwell

Email Address: ksideco@arb.ca.gov

Affiliation: Houston BioFuels Consultants LLC

Subject: Question regarding: Requirements to be Classified as a Tier 1 Pathway  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/153-lcfs2015-BW0FYVw+WVUDd1Qx.pdf](http://www.arb.ca.gov/lists/com-attach/153-lcfs2015-BW0FYVw+WVUDd1Qx.pdf)

Original File Name: HBC\_Requirements to be Classified.pdf

Date and Time Comment Was Submitted: 2015-06-30 13:42:18

No Duplicates.

## **Comment 5 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: John  
Last Name: Greene  
Email Address: [jmgreene@ghienergy.com](mailto:jmgreene@ghienergy.com)  
Affiliation:

Subject: Comments to June 23 LCFS Revisions  
Comment:

Our comments are attached.

Attachment: [www.arb.ca.gov/lists/com-attach/155-lcfs2015-Am4CZ1UyVnYDWIAk.pdf](http://www.arb.ca.gov/lists/com-attach/155-lcfs2015-Am4CZ1UyVnYDWIAk.pdf)

Original File Name: LCFS Tier 1 Provisional GHI 070615.pdf

Date and Time Comment Was Submitted: 2015-07-06 13:12:14

No Duplicates.



## **Comment 6 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: Karen

Last Name: Connors

Email Address: kconnors@ensyn.com

Affiliation:

Subject: Ensyn Corporation LCFS comments

Comment:

Dear Sir/Madam:

Please see attached letter from Ensyn Corporation, which contains comments regarding proposed modified regulatory language with respect to the re-adoption of the Low Carbon Fuel Standard.

Sincerely,

Karen Connors

VP & Associate General Counsel

(212) 220-8680

Attachment: [www.arb.ca.gov/lists/com-attach/156-lcfs2015-AWRVPVwuUHpROQgl.pdf](http://www.arb.ca.gov/lists/com-attach/156-lcfs2015-AWRVPVwuUHpROQgl.pdf)

Original File Name: Ensyn-CARB LCFS Comments (July 8, 2015).pdf

Date and Time Comment Was Submitted: 2015-07-08 11:25:16

No Duplicates.

## **Comment 7 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: Marie-Helene  
Last Name: Labrie  
Email Address: mlabrie@enerkem.com  
Affiliation:

Subject: Enerkem comments on the modified text for LCFS re-adoption  
Comment:

July 8, 2015

Dear Sir/Madam,

Enerkem appreciates the opportunity to submit comments on the modified text for the proposed re-adoption of the Low Carbon Fuel Standard (LCFS).

Enerkem is a leading waste-to-biofuels and chemicals company. We produce clean fuels and green chemicals from non-recyclable municipal solid waste, thus helping diversify energy sources while offering a sustainable alternative to landfilling and incineration. Our facility in Edmonton, Alberta (Canada) is the world's first commercial biorefinery to use municipal solid waste to produce biomethanol and ethanol. We are currently developing biorefineries in North America and globally, based on our modular and standardized manufacturing approach and using our proprietary biofuels technology, developed in-house since 2000.

The LCFS makes California a very attractive market for the low carbon ethanol to be produced at our Edmonton biorefinery (currently beginning operations), and also an attractive investment environment for developing future Enerkem facilities in the state.

We would first like to thank the Air Resources Board for taking low carbon fuel producers' concerns into account following the first 15-Day Modified Regulation Order by removing the limitations on the sale and transfer of credits generated under provisional pathways. Dropping this limitation removes a significant barrier to financing of projects to develop new capacity for low carbon fuel production in California and for the California market.

This change, while very important, does not resolve all issues relating to new low carbon fuel production facilities. The proposed rule still requires that facilities be in "full commercial production" for at least one full calendar quarter before even applying for a new pathway. The rule places new facilities in an extremely difficult commercial position, by effectively requiring facilities to be in commercial production but without possibility to sell the fuel produced. Considering the time from submission of a new pathway application to publishing of the CI, new facilities would, in effect, have to be in "full commercial production" for approximately one year before being able to sell fuel into the California market.

This places a significant damper on any plans to develop new low carbon fuel production facilities in California, as it is unclear how such facilities could sell fuel produced during the first year of commercial operations. The uncertainty concerning revenue streams following plant construction, and the barrier to selling fuel in the first year of operations, will undermine financing for projects utilizing innovative fuel technologies and thereby hinder attainment of the Air Resources Board's aggressive CI and petroleum reduction goals.

The provision also creates a barrier for out-of-state new production facilities that could potentially supply low carbon fuel to the California market, as without a CI it is nearly impossible to secure off-take agreements for low carbon fuel.

Enerkem urges the Air Resources Board to remove the requirement to have been in full commercial production for one quarter prior to applying for a new pathway, in order to encourage the production and commercialization of new low carbon fuels such as municipal waste to ethanol.

Enerkem believes that the power of the Executive Officer to adjust the number of credits or reverse any provisional credit in the producer's account, until the provisional CI has been successfully corroborated by operational records covering a full two years of commercial operation, is sufficient to enable verification of carbon intensity data from new production facilities. However, if the Air Resources Board considers it necessary to have operational data to verify the proposed carbon intensity of the new pathway at the time of application, greater flexibility could be afforded to companies by allowing some of this data to come from the company's existing pilot or demonstration facilities or from commissioning activities at the facility for which the pathway is being requested.

If the Air Resources Board wishes to limit pathway applications to commercial facilities that are being built, rather than leave the door open to the creation of pathways for which commercial projects have not yet been developed, Air Resources Board could consider requiring an independent engineering review and a site visit to be included with the application for a new pathway.

We thank the Air Resources Board for the opportunity to submit comments on the modified text for the proposed re-adoption of the Low Carbon Fuel Standard (LCFS), and hope that the Board will make the small changes necessary to enable low carbon fuel producers to secure the financing required to develop new production facilities, which will be needed to achieve the Board's greenhouse gas emissions reductions goals.

Sincerely,

Marie-Helene Labrie  
Senior Vice-President, Government Affairs and Communications

Attachment: [www.arb.ca.gov/lists/com-attach/157-lcfs2015-Wj9SOIM3AyIEaQht.pdf](http://www.arb.ca.gov/lists/com-attach/157-lcfs2015-Wj9SOIM3AyIEaQht.pdf)

Original File Name: Enerkem comments LCFS 08 07 2015.pdf

Date and Time Comment Was Submitted: 2015-07-08 11:53:17

No Duplicates.

## **Comment 8 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: Joshua  
Last Name: Willter  
Email Address: [jwillter@sierraresearch.com](mailto:jwillter@sierraresearch.com)  
Affiliation: Sierra Research

Subject: Growth Energy 2nd 15-Day LCFS Comments  
Comment:

Growth Energy Second 15-Day LCFS Comments.pdf

Note: We previously attempted to upload a zipped file containing the attached pdf file and a MP4 file but received an error message.

This is a second attempt to upload only the pdf file.

A video was submitted along with this comment and is available upon request from the Clerk of the Board.

Attachment: [www.arb.ca.gov/lists/com-attach/159-lcfs2015-AmUAdANtWX0GdAVt.pdf](http://www.arb.ca.gov/lists/com-attach/159-lcfs2015-AmUAdANtWX0GdAVt.pdf)

Original File Name: Growth Energy Second 15-Day LCFS Comments.pdf

Date and Time Comment Was Submitted: 2015-07-08 14:36:07

No Duplicates.

## **Comment 9 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: Tim

Last Name: Carmichael

Email Address: [tim@cngvc.org](mailto:tim@cngvc.org)

Affiliation: California Natural Gas Vehicle Coalition

Subject: Comments on ARB's "Attachment A: Second 15-Day Modified Regulation Order" (LCFS)  
Comment:

Please see the attached letter, which was jointly prepared and submitted by the California Natural Gas Vehicle Coalition, NGVAmerica, and the Coalition for Renewable Natural Gas.

Attachment: [www.arb.ca.gov/lists/com-attach/160-lcfs2015-BXZQMwdlBDhWPIM3.docx](http://www.arb.ca.gov/lists/com-attach/160-lcfs2015-BXZQMwdlBDhWPIM3.docx)

Original File Name: Second 15-day Comment Letter to Richard Corey July 8 2015\_Final.docx

Date and Time Comment Was Submitted: 2015-07-08 15:12:38

No Duplicates.

## **Comment 10 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: Carol  
Last Name: Tjong  
Email Address: ctjong@white-energy.com  
Affiliation: White Energy

Subject: 2nd 15-day Notice to Proposed LCFS Regulations  
Comment:

Please see attached document, thank you for allowing this comment period.

Attachment: [www.arb.ca.gov/lists/com-attach/161-lcfs2015-BjRXYVFhVjBQeAQ0.pdf](http://www.arb.ca.gov/lists/com-attach/161-lcfs2015-BjRXYVFhVjBQeAQ0.pdf)

Original File Name: 2015.07.08 White Energy comments on CARB 2nd 15-day Notice.pdf

Date and Time Comment Was Submitted: 2015-07-08 14:48:31

No Duplicates.

## **Comment 11 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: Jan

Last Name: Koninckx

Email Address: Jan.Koninckx@dupont.com

Affiliation:

Subject: DuPont comments on Second Notice of Proposed Modified Text for LCFS Re-Adoption  
Comment:

DuPont respectfully submits the attached comments on the Second  
Notice of Modified Text for the Amendments to the LCFS.

Best Regards,  
Jan Koninckx

Attachment: [www.arb.ca.gov/lists/com-attach/162-lcfs2015-AGRSIVcmWWULYwZy.pdf](http://www.arb.ca.gov/lists/com-attach/162-lcfs2015-AGRSIVcmWWULYwZy.pdf)

Original File Name: DuPont\_ReadoptRegs\_LCFS\_070815.pdf

Date and Time Comment Was Submitted: 2015-07-08 16:27:41

No Duplicates.



**Comment 12 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: Geoff

Last Name: Cooper

Email Address: gcooper@ethanolrfa.org

Affiliation:

Subject: RFA Comments on 2nd 15-Day Notice re: LCFS Re-adoption

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/163-lcfs2015-WigFZQdnAg5XMgZp.pdf](http://www.arb.ca.gov/lists/com-attach/163-lcfs2015-WigFZQdnAg5XMgZp.pdf)

Original File Name: RFA comments on LCFS re-adoption\_2nd 15-day notice.pdf

Date and Time Comment Was Submitted: 2015-07-08 16:53:32

No Duplicates.

## **Comment 13 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-2.**

First Name: Graham

Last Name: Ellis

Email Address: gellis@solazyme.com

Affiliation: Solazyme, Inc.

Subject: Proposed Re-Adoption of the LCFS

Comment:

Solazyme's comments are in the attached PDF.

Attachment: [www.arb.ca.gov/lists/com-attach/164-lcfs2015-AjNQYwc2WDxVYwE5.pdf](http://www.arb.ca.gov/lists/com-attach/164-lcfs2015-AjNQYwc2WDxVYwE5.pdf)

Original File Name: 150708 Solazyme Comments on Revised LCFS Proposal.pdf

Date and Time Comment Was Submitted: 2015-07-08 16:42:11

No Duplicates.

## **Comment 1 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-3.**

First Name: Jan

Last Name: Koninckx

Email Address: Jan.Koninckx@dupont.com

Affiliation:

Subject: DuPont comments on Third Notice of Proposed Modified Text for LCFS Re-Adoption  
Comment:

Thank you for the opportunity to comment on the Third Notice of  
Proposed Modified Text for the LCFS Readoption.  
Best Regards,  
Jan Koninckx

Attachment: [www.arb.ca.gov/lists/com-attach/165-lcfs2015-AmZUJ1QIU28LYwdz.pdf](http://www.arb.ca.gov/lists/com-attach/165-lcfs2015-AmZUJ1QIU28LYwdz.pdf)

Original File Name: DuPont\_\_CA LCFS Readopt\_081715.pdf

Date and Time Comment Was Submitted: 2015-08-17 15:58:52

No Duplicates.

## **Comment 2 for Low Carbon Fuel Standard 2015 (lcfs2015) - 15-3.**

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Subject: LCFS Third 15-Day Comments  
Comment:

GrowthEnergy LCFS Third 15-Day Comments (1 zipped file)

Attachment: [www.arb.ca.gov/lists/com-attach/166-lcfs2015-UzRTJ1A+VnIEdlU9.zip](http://www.arb.ca.gov/lists/com-attach/166-lcfs2015-UzRTJ1A+VnIEdlU9.zip)

Original File Name: GrowthEnergy Third 15-Day Comments.zip

Date and Time Comment Was Submitted: 2015-08-17 16:32:21

No Duplicates.