

## **Comment 1 for Phase 3 Reformulated Gasoline (carfg07) - 45 Day.**

First Name: Gina

Last Name: Grey

Email Address: gina@wspa.org

Affiliation: WSPA

Subject: WSPA Comments

Comment:

Please find attached the WSPA written comments on Item 07-6-3 -  
Public Hearing to Consider Amendments to the Phase 3 CA RFG  
Regulations.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/38-carfg3hr-g-wspacomments.607-1.pdf'

Original File Name: CaRFG3HRG-WSPAComments.607-1.pdf

Date and Time Comment Was Submitted: 2007-06-04 18:34:55

No Duplicates.

## **Comment 2 for Phase 3 Reformulated Gasoline (carfg07) - 45 Day.**

First Name: Dave

Last Name: Smith

Email Address: David.Smith8@bp.com

Affiliation: BP America, Inc.

Subject: BP Comments on June 14, 2007 Agenda Item: 07-6-3 Amendments to the Phase 3 CA Reformulated

Comment:

Please see the attached comment.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/39-cbg4\\_bp\\_letter2.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/39-cbg4_bp_letter2.doc)'

Original File Name: CBG4 BP Letter2.doc

Date and Time Comment Was Submitted: 2007-06-05 13:07:52

No Duplicates.

### **Comment 3 for Phase 3 Reformulated Gasoline (carfg07) - 45 Day.**

First Name: Gary

Last Name: Herwick

Email Address: gary.herwick@comcast.net

Affiliation: Transportation Fuels Consulting Inc.

Subject: Comments submitted on behalf of Renewable Fuels Association

Comment:

I am resubmitting comments previously sent on June 1, 2007 to address a problem with attached files reported to me on June 5 by Steve Brisby of ARB staff. Two files in portable document file (pdf) format have been placed into a .ZIP file as instructed and attached to this message.

The attached files contain a cover letter and a report provided as comments to the subject public hearing on behalf of the Renewable Fuels Association.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/40-rfa\_comments\_predictive\_model\_31ma07.zip'

Original File Name: RFA Comments Predictive Model 31MA07.zip

Date and Time Comment Was Submitted: 2007-06-06 07:14:10

No Duplicates.

## **Comment 4 for Phase 3 Reformulated Gasoline (carfg07) - 45 Day.**

First Name: steve

Last Name: charlesworth

Email Address: stephencharleswort@sbcglobal.net

Affiliation:

Subject: changing diesel fuels and engines

Comment:

I think this is a case of the California air resources board meddeling with things that affect our economy and life styles and you don't have all the facts except for what you guys won't too hear Just like the fiasco of M T B E in our gasoline You the board members had no clue what it was going to do!!! And again your going to make major changes Just because you think its a good idea not knowing all the facts!!!!

Please stop trying to do the wrong things and pay attention to the true facts before you make a mess of the diesel fuels and the transportation industry!!!

Thank you  
Concerned citizen  
Steve charlesworth

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2007-06-11 21:01:20

No Duplicates.

## **Comment 5 for Phase 3 Reformulated Gasoline (carfg07) - 45 Day.**

First Name: Brooke

Last Name: Coleman

Email Address: bcoleman@reapcoalition.org

Affiliation: REAP Coalition

Subject: CaRFG3 Amendments

Comment:

Comments re: CaRFG3 Update

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/45-carfg3\_boardcomments.pdf'

Original File Name: CaRFG3\_boardcomments.pdf

Date and Time Comment Was Submitted: 2007-06-12 13:41:41

No Duplicates.

## **Comment 6 for Phase 3 Reformulated Gasoline (carfg07) - 45 Day.**

First Name: Ellen

Last Name: Shapiro

Email Address: eshapiro@autoalliance.org

Affiliation:

Subject: Alliance of Automobile Manufacturers Comments

Comment:

Alliance of Automobile Manufacturers comments on Proposed  
Amendments to Phase 3 CaRFG of item # 07-6-3 of June 14, 2007  
Hearing.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/46-  
alliance\_comments\_to\_arb\_on\_proposed\_carfg\_amendments\_for\_0614\_07\_hearing\_061207.pdf  
,

Original File Name: Alliance Comments to ARB on proposed CaRFG Amendments for 0614 07  
hearing 061207.pdf

Date and Time Comment Was Submitted: 2007-06-12 13:55:01

No Duplicates.

## **Comment 7 for Phase 3 Reformulated Gasoline (carfg07) - 45 Day.**

First Name: Barry

Last Name: Wallerstein

Email Address: Non-web submitted comment

Affiliation: SCAQMD

Subject: Comments on the SCAQMD on the ARB Staff Proposed Amendments to Phase 3 CA Reformulated Gas

Comment:

Please see the attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/47-carfg07-7.pdf>'

Original File Name: carfg07-7.pdf

Date and Time Comment Was Submitted: 2007-06-13 09:47:27

No Duplicates.

## **Comment 8 for Phase 3 Reformulated Gasoline (carfg07) - 45 Day.**

First Name: James  
Last Name: Uihlein  
Email Address: [juih@chevron.com](mailto:juih@chevron.com)  
Affiliation: Chevron

Subject: Chevron Comments on the Proposed 2007 Amendments to the CaRFG3 Regulations  
Comment:

Please see the attachment.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/48-07-6-3\\_2007\\_amendments\\_carfg3\\_-\\_chevron\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/48-07-6-3_2007_amendments_carfg3_-_chevron_comments.pdf)'

Original File Name: 07-6-3 2007 Amendments CaRFG3 - Chevron Comments.pdf

Date and Time Comment Was Submitted: 2007-06-13 10:42:43

No Duplicates.



## **Comment 9 for Phase 3 Reformulated Gasoline (carfg07) - 45 Day.**

First Name: Luke

Last Name: Tonachel

Email Address: ltonachel@nrdc.org

Affiliation: Environmental community

Subject: Environmental community comments to CaRFG amendments

Comment:

I am pleased to provide the attached comment letter on behalf of the American Lung Association of CA, Center for Energy Efficiency and Renewable Technologies, Natural Resources Defense Council and Union of Concerned Scientists.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/49-enviro\_ltr\_to\_arb\_carfg\_amendments\_2007-06-13.pdf'

Original File Name: Enviro Ltr to ARB CaRFG Amendments 2007-06-13.pdf

Date and Time Comment Was Submitted: 2007-06-13 10:56:34

No Duplicates.

## **Comment 1 for Phase 3 Reformulated Gasoline (carfg07). (At Hearing)**

First Name: Paul

Last Name: Wuebben

Email Address: Non-web submitted comment

Affiliation: SCAQMD

Subject: Amendments to the CA Phase 3 Reformulated Gasoline Regs.

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/50-carfg07-ws-1.pdf>

Original File Name: carfg07-ws-1.pdf

Date and Time Comment Was Submitted: 2007-06-20 13:14:11

No Duplicates.

## **Comment 2 for Phase 3 Reformulated Gasoline (carfg07). (At Hearing)**

First Name: Ellen

Last Name: Shapiro

Email Address: Non-web submitted comment

Affiliation: Alliance of Automobile Manufacturers

Subject: Amendments to the CA Phase 3 Reformulated Gasoline Regs.

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/51-carfg07-ws-2.pdf>

Original File Name: carfg07-ws-2.pdf

Date and Time Comment Was Submitted: 2007-06-20 13:15:16

No Duplicates.

### **Comment 3 for Phase 3 Reformulated Gasoline (carfg07). (At Hearing)**

First Name: David

Last Name: Hirshfeld

Email Address: Non-web submitted comment

Affiliation: MathPro Inc.

Subject: Amendments to the CA Phase 3 Reformulated Gasoline Regs.

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/52-carfg07-ws-3.pdf>

Original File Name: carfg07-ws-3.pdf

Date and Time Comment Was Submitted: 2007-06-20 13:17:23

No Duplicates.

## **Comment 4 for Phase 3 Reformulated Gasoline (carfg07). (At Hearing)**

First Name: Gordon

Last Name: Schremp

Email Address: gschremp@energy.state.ca.us

Affiliation: CA Energy Commission

Subject: Amendments to the CA Phase 3 Reformulated Gasoline Regs.

Comment:

Please see the attached comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/53-carfg07-ws-4.pdf>

Original File Name: carfg07-ws-4.pdf

Date and Time Comment Was Submitted: 2007-06-20 13:22:32

No Duplicates.

## **Comment 1 for Phase 3 Reformulated Gasoline (carfg07) - 15-1.**

First Name: Christopher

Last Name: Calder

Email Address: calderhome@yahoo.com

Affiliation: none at all!

Subject: Biofuel disaster must be stopped now!

Comment:

Biofuels are causing food and water shortages, rapid food cost inflation, and are speeding global warming.

Oil price increases have not shrunk the human food supply, but biofuel production has! The more biofuels we produce, the less food we have to eat, because we grow biofuel crops, even switchgrass, using the same land, water, fertilizer, farm equipment, and labor we use to grow food. The world is running out of wheat because too many wheat farmers have switched to growing corn for ethanol production. The USDA states that by May US wheat supplies will be lower than any time since 1948.

The FAO states global food prices rose 40% in 2007. When America foolishly turns its food into fuel, we raise food prices worldwide which gives other countries a financial incentive to burn down rainforests in order to grow more food. It takes 9,000 gallons of water to create just 1 gallon of biodiesel, so biofuel production aggravates water shortages.

The twisted logic of biofuel advocates has been that we should gladly starve the world today by turning our food into fuel, but in a few years the world can eat again because we will soon make biofuels out of easy to grow inedible cellulose crops instead of food. Three agricultural economists with insider knowledge from Iowa State University have published a study which states that ethanol made from cellulose will never be affordable. Federal tax credits would have to be raised from the current \$.51 per gallon for corn ethanol to \$1.55 per gallon for cellulosic ethanol. That means no ethanol from switchgrass, wood chips, or crop waste will ever be sellable.

<http://www.card.iastate.edu/publications/DBS/PDFFiles/08wp460.pdf>

This comes on top of the recent Princeton University study published in the journal SCIENCE that concludes that all current and proposed future biofuels, even switchgrass, are far worse for the environment and global warming than using ordinary gasoline. <http://www.sciencemag.org/cgi/content/abstract/1151861>

Nitrogen fertilizers used to grow anything unleash nitrous oxide, a greenhouse gas 296 times more powerful than carbon dioxide. Farming contributes more to global warming each year than all land, sea, and air transportation combined, so farming should only be used for essential food production.

The global destruction caused by biofuels makes no sense

strategically because by 2015 it is estimated that oil from shale will cost only \$30 a barrel to manufacture, and there is far more oil potential in American shale than in the entire Middle East before drilling began in 1908.

The "energy independence" argument for biofuels is a hoax because American biodiesel made out of soybeans costs the equivalent of making regular diesel out of oil at \$232 a barrel. Making ethanol from corn costs the equivalent of oil at \$81. a barrel and uses 28% more fossil fuels than gasoline.

MORE BIOFUEL FACTS -

<http://home.att.net/~meditation/bio-fuel-hoax.html>

Christopher Calder - concerned citizen with no connection to any special interest group  
377 W 8th, apt. 114  
Eugene, Oregon 97401  
541-345-6372

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-03-17 16:58:58

No Duplicates.

## **Comment 2 for Phase 3 Reformulated Gasoline (carfg07) - 15-1.**

First Name: James  
Last Name: Uihlein  
Email Address: [juih@chevron.com](mailto:juih@chevron.com)  
Affiliation: Chevron

Subject: Chevron Comments on CaRFG3 15 Day Modifications  
Comment:

Chevron's comments on the 15 day modifications are attached. Thank you for your consideration.

Regards,  
Jim Uihlein  
Fuels Technology Advisor  
Chevron

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/55-chevron\\_15\\_day\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/55-chevron_15_day_comments.pdf)

Original File Name: Chevron 15 Day Comments.pdf

Date and Time Comment Was Submitted: 2008-03-24 12:43:27

No Duplicates.



### **Comment 3 for Phase 3 Reformulated Gasoline (carfg07) - 15-1.**

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

Subject: WSPA Comments  
Comment:

Please disregard last submittal - we did not have both attachments in a zip file. Thank you.

Attached are the Western States Petroleum Association (WSPA) comments on CARB's modified text/15 day package for the proposed 2007 amendments to California phase 3 reformulated gasoline regulations.

Our industry remains concerned over the inclusion in the rule of an alternative emissions reduction plan (AERP). As currently designed, this unprecedented AERP amounts to a penalty payment program. The record before ARB in this rulemaking demonstrates that the AERP rests on an unrealistic and unreasonable compliance timeline, and it is therefore unjustified.

We look forward to continued dialogue on this important matter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/57-pm15day.zip>

Original File Name: PM15Day.zip

Date and Time Comment Was Submitted: 2008-03-24 15:02:19

No Duplicates.

## **Comment 4 for Phase 3 Reformulated Gasoline (carfg07) - 15-1.**

First Name: Darren

Last Name: Stroud

Email Address: Non-web submitted comment

Affiliation:

Subject: Valero Energy Corporation

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/58-valero0001.pdf>

Original File Name: valero0001.pdf

Date and Time Comment Was Submitted: 2008-03-24 16:11:40

No Duplicates.

## **Comment 5 for Phase 3 Reformulated Gasoline (carfg07) - 15-1.**

First Name: Barry

Last Name: Wallerstein

Email Address: Non-web submitted comment

Affiliation:

Subject: South Coast Air Quality Management District

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/59-scaqmd0001.pdf>

Original File Name: scaqmd0001.pdf

Date and Time Comment Was Submitted: 2008-03-24 16:23:01

No Duplicates.

## **Comment 1 for Phase 3 Reformulated Gasoline (carfg07) - 15-2.**

First Name: Lynn D.  
Last Name: Westfall  
Email Address: lwestfall@tsocorp.com  
Affiliation:

Subject: 2nd 15 Day Notice-2007 Amendments to the Phase 3 CA Reformulated Gasoline Regulations

Comment:

Attached is our response to the referenced subject matter. Note original will be sent today via DHL services.

Thank you,

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/60-ltr\\_to-ca\\_air\\_resources\\_board\\_re\\_2nd\\_15\\_day\\_notice\\_-\\_2007\\_amendments\\_to\\_the\\_phase\\_3\\_ca\\_reformulated\\_gasoline\\_regulations.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/60-ltr_to-ca_air_resources_board_re_2nd_15_day_notice_-_2007_amendments_to_the_phase_3_ca_reformulated_gasoline_regulations.pdf)

Original File Name: Ltr to-CA Air Resources Board re 2nd 15 day Notice - 2007 Amendments to the Phase 3 CA Reformulated Gasoline Regulations.pdf

Date and Time Comment Was Submitted: 2008-07-08 09:12:30

No Duplicates.

## **Comment 2 for Phase 3 Reformulated Gasoline (carfg07) - 15-2.**

First Name: Darren

Last Name: Stroud

Email Address: Non-web submitted comment

Affiliation:

Subject: Valero Energy Corporation

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/carfg07/62-carfg0004.pdf>

Original File Name: carfg0004.pdf

Date and Time Comment Was Submitted: 2008-07-14 10:15:14

No Duplicates.