

**Comment 1 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

First Name: Timothy  
Last Name: O'Connor  
Email Address: toconnor@environmentaldefense.org  
Affiliation:

Subject: Comment on Low Carbon Fuel Standard – Policy and Regulatory Development Workgroup  
Comment:

Dear Dean and John,

Please accept the attached comment letter from Environmental Defense on the design of a Low Carbon Fuel Standard for California. Please feel free to contact me with any questions you may have.

Thank you,

Tim O'Connor

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/1-env\\_defense\\_carb\\_lcfs\\_comment\\_letter\\_\\_t\\_oconnor\\_-\\_ed\\_.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/1-env_defense_carb_lcfs_comment_letter__t_oconnor_-_ed_.doc)

Original File Name: Env\_Defense\_CARB LCFS Comment Letter (T OConnor - ED).doc

Date and Time Comment Was Submitted: 2008-01-16 16:58:41

1 Duplicates.

**Comment 2 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

First Name: Cal

Last Name: Hodge

Email Address: CalHodge@aol.com

Affiliation: A 2nd Opinion Inc for Neste Oil

Subject: LCFS Policy Comments

Comment:

See Attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/3-122107nesteoil.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/3-122107nesteoil.pdf)

Original File Name: 122107nesteoil.pdf

Date and Time Comment Was Submitted: 2008-01-18 09:16:33

No Duplicates.

**Comment 3 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

First Name: Brooke

Last Name: Coleman

Email Address: brooke@reapcoalition.org

Affiliation: New Fuels Alliance

Subject: Policy Issue: Maintaining Compliance Neutrality

Comment:

See Attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/4-122007reapco.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/4-122007reapco.pdf)

Original File Name: 122007reapco.pdf

Date and Time Comment Was Submitted: 2008-01-18 09:19:07

No Duplicates.

**Comment 4 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

First Name: Bruce

Last Name: Buchholz

Email Address: buchholz2@llnl.gov

Affiliation: Livermore National Lab

Subject: Compliance and Enforcement Working Group

Comment:

See attachment - also related to Policy Group

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/5-100707lnl.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/5-100707lnl.pdf)

Original File Name: 100707lnl.pdf

Date and Time Comment Was Submitted: 2008-01-18 09:22:49

No Duplicates.

## **Comment 5 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

First Name: Remy

Last Name: Garderet

Email Address: remy.garderet@einow.org

Affiliation: Energy Independence Now

Subject: LCFS comments on non-biofuel

Comment:

Dear Mr. Simeroth and Mr. Curtis,  
Attached please find comments submitted by Energy Independence Now on the LCFS. Our comments, in summary, cover the following points:

1. The LCFS appears well designed to incentivize low-level blending of biofuels into conventional fuels, and spurring innovation to source and create lower carbon varieties of these blends. (We offer some thoughts for its fine tuning in that regard).
2. However, although the scope of the LCFS extends beyond biofuels, we are deeply concerned that the LCFS mechanism will not provide a sufficient incentive for the development of these other ultra-low carbon technologies. This could impair our ability to meet long term GHG goals, and effectively leaves all our eggs in one basket - biofuels.
3. We therefore urge ARB to assign dedicated resources and a stakeholder process to address the particular needs of non-biofuel technologies, with special attention to electricity and hydrogen given their low carbon promise. Our letter provides suggestions on some of the key issues to address as part of this.

Thank you for continued work in developing this innovative standard.

Sincerely,  
Daniel Emmett  
Remy Garderet

Energy Independence Now

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/6-ein\\_submission\\_on\\_lcfs.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/6-ein_submission_on_lcfs.pdf)

Original File Name: EIN Submission on LCFS.pdf

Date and Time Comment Was Submitted: 2008-02-12 12:06:30

No Duplicates.

**Comment 6 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

First Name: Jamie

Last Name: Knapp

Email Address: jamie@jknappcommunications.com

Affiliation: J Knapp Communications

Subject: The LCFS Statement of Principles

Comment:

See Attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/7-lcfs\\_principles\\_-\\_final\\_-\\_2-19-08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/7-lcfs_principles_-_final_-_2-19-08.pdf)

Original File Name: LCFS Principles - final - 2-19-08.pdf

Date and Time Comment Was Submitted: 2008-02-26 16:53:39

No Duplicates.

**Comment 7 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Catherine

Last Name: Reheis-Boyd

Email Address: creheis@wspa.org

Affiliation: Western States Petroleum Association

Subject: LCFS Implementation Proposal from Western States Petroleum Association  
Comment:

See Attachement

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/8-032508wspa\\_prop.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/8-032508wspa_prop.pdf)

Original File Name: 032508wspa\_prop.pdf

Date and Time Comment Was Submitted: 2008-03-26 08:32:13

No Duplicates.

**Comment 8 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

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



**Comment 9 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Stefan

Last Name: Unnasch

Email Address: stefan.unnasch@gmail.com

Affiliation: Life Cycle Associates

Subject: Comments for LCFS Regulatory Outline

Comment:

Comments for the LCFS Reg Outline released in March.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/10-comments\\_on\\_lcfs\\_concept\\_outline\\_v5.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/10-comments_on_lcfs_concept_outline_v5.doc)

Original File Name: Comments\_on\_LCFS\_Concept\_Outline\_v5.doc

Date and Time Comment Was Submitted: 2008-04-18 07:57:16

No Duplicates.

**Comment 10 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Rahul

Last Name: Iyer

Email Address: rahul.iyer@primafuel.com

Affiliation: Primafuel, Inc.

Subject: Comments for LCFS Regulatory Outline

Comment:

Attached, please find Primafuel's comments regarding the Proposed Concept Outline for the California Low Carbon Fuel Standard Regulation.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/11-lcfs-comments-primafuel.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/11-lcfs-comments-primafuel.pdf)

Original File Name: LCFS-comments-Primafuel.pdf

Date and Time Comment Was Submitted: 2008-04-23 12:09:36

No Duplicates.

**Comment 11 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Mark

Last Name: Capron

Email Address: markcapron@podenergy.org

Affiliation:

Subject: Comments for LCFS Concept Outline

Comment:

Comments for LCFS Concept Outline

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/12-pod\\_energy.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/12-pod_energy.doc)

Original File Name: POD energy.doc

Date and Time Comment Was Submitted: 2008-04-30 07:53:51

No Duplicates.

**Comment 12 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Neville

Last Name: Fernandes

Email Address: Neville.Fernandes@nesteoil.com

Affiliation: Neste Oil

Subject: Comments to Proposed Concept Outline for the California Low Carbon Fuel Standard  
Comment:

Attached please find Neste Oil Comments to Proposed Concept Outline for the California Low Carbon Fuel Standard Regulation.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/13-neste\\_comments\\_on\\_california\\_lcfs\\_april302008.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/13-neste_comments_on_california_lcfs_april302008.pdf)

Original File Name: Neste Comments on California LCFS April302008.pdf

Date and Time Comment Was Submitted: 2008-04-30 08:33:19

No Duplicates.

**Comment 13 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Diesel Technology

Last Name: Forum

Email Address: Diesel\_Technology\_Forum@dieselforum.org

Affiliation: Diesel Technology Forum

Subject: Comments for LCFS Concept Outline

Comment:

Please find attached the Diesel Technology Forum's comments on CARB's proposed concept outline for the California Low Carbon Fuel Standard Regulation.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/14-4.30.08\\_dtf\\_lcfs\\_comments.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/14-4.30.08_dtf_lcfs_comments.pdf)

Original File Name: 4.30.08 DTF LCFS Comments.pdf

Date and Time Comment Was Submitted: 2008-04-30 14:25:20

No Duplicates.

**Comment 14 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Dave

Last Name: Modisette

Email Address: Dave@ppallc.com

Affiliation: California Electric Transportation Coa.

Subject: Comments on ARB LCFS Concept Outline

Comment:

Please find attached the Comments of the California Electric Transportation Coalition (CaETC) on the ARB Staff proposed Concept Outline for the California Low Carbon Fuel Standard Regulation.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/15-caetc\\_eletter\\_-\\_caetc\\_comments\\_on\\_proposed\\_concept\\_outline\\_final\\_05-01-08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/15-caetc_eletter_-_caetc_comments_on_proposed_concept_outline_final_05-01-08.pdf)

Original File Name: CaETC ELetter - CaETC Comments on Proposed Concept Outline Final 05-01-08.pdf

Date and Time Comment Was Submitted: 2008-05-02 07:50:29

No Duplicates.

**Comment 15 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

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

**Comment 16 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Terrie

Last Name: Mattern

Email Address: terrie.mattern@shell.com

Affiliation: Shell Oil Company

Subject: Comments on LCFS Concept Outline

Comment:

Thank you for letting Shell have this opportunity to comment on CARB's draft LCFS Outline.

Attached is the document that includes our comments on the Air Resources Board's "Proposed Concept Outline for the California Low Carbon Fuel Standard Regulation (March 2008)".

You may contact Clay Calkin at 925-313-3321 if you have any questions concerning these comments.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/17-shell\\_lcfs\\_comments\\_final.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/17-shell_lcfs_comments_final.doc)

Original File Name: Shell LCFS comments final.doc

Date and Time Comment Was Submitted: 2008-05-06 07:58:08

No Duplicates.



**Comment 17 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Timothy  
Last Name: O'Connor  
Email Address: toconnor@edf.org  
Affiliation: Environmental Defense Fund

Subject: EDF LCFS Comment Letter  
Comment:

Please accept the attached comment letter from EDF on the proposed concept outline.

Thanks in advance,

Tim O'Connor

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/18-edf\\_comments\\_\\_may\\_2008\\_\\_-\\_lcfs\\_concept\\_outline.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/18-edf_comments__may_2008__-_lcfs_concept_outline.pdf)

Original File Name: EDF comments (May 2008) - LCFS concept outline.pdf

Date and Time Comment Was Submitted: 2008-05-06 08:00:26

No Duplicates.

**Comment 18 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Todd

Last Name: Campbell

Email Address: tcampbell@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: Clean Energy's Comments on the Proposed LCFS Standard

Comment:

Dear Dean and Christina,

Clean Energy is honored to submit the following comments on the "Proposed Concept Outline for the California Low Carbon Fuel Standard Regulation." We hope that they are received well and we look forward to working with you and supporting you throughout this process. A hard copy of these comments will sent to you shortly. If you have any questions or comments, please do not hesitate to contact me directly.

Sincerely,

Todd Campbell

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/19-clean\\_energy\\_comments\\_on\\_proposed\\_lcfs\\_5.6.08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/19-clean_energy_comments_on_proposed_lcfs_5.6.08.pdf)

Original File Name: Clean Energy Comments on Proposed LCFS 5.6.08.pdf

Date and Time Comment Was Submitted: 2008-05-07 10:55:58

No Duplicates.

**Comment 19 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Remy

Last Name: Garderet

Email Address: remy.garderet@einow.org

Affiliation: Energy Independence Now

Subject: EIN Comments on LCFS Proposal Concept Outline (May 08)

Comment:

Please accept the attached comment letter from EIN on the proposed concept outline.

Sincerely,

Remy Garderet

Energy Independence Now

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/20-ein\\_submission\\_on\\_proposed\\_concept\\_outline\\_for\\_lcfs.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/20-ein_submission_on_proposed_concept_outline_for_lcfs.pdf)

Original File Name: EIN Submission on Proposed Concept Outline for LCFS.pdf

Date and Time Comment Was Submitted: 2008-05-07 12:48:22

No Duplicates.

**Comment 20 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Harry

Last Name: Simpson

Email Address: [hsimpson@crimsonrm.com](mailto:hsimpson@crimsonrm.com)

Affiliation: Crimson Renewable Energy LP

Subject: LCFS comments and recommendations from California Biodiesel Alliance

Comment:

Attached are comments and recommendations regarding LCFS from the California Biodiesel Alliance (CBA) as in interested stakeholder party in the process for formulating the rules and regs for LCFS.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/21-lcfs\\_comments\\_cba\\_5-7-08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/21-lcfs_comments_cba_5-7-08.pdf)

Original File Name: LCFS Comments\_CBA\_5-7-08.pdf

Date and Time Comment Was Submitted: 2008-05-08 16:46:17

No Duplicates.

**Comment 21 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Patricia

Last Name: Monahan

Email Address: pmonahan@ucsusa.org

Affiliation:

Subject: UCS Comments on CARB Regulatory Concepts for the LCFS

Comment:

Attached are UCS's comments on the Regulatory Concepts for the LCFS.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/22-usc\\_comments.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/22-usc_comments.zip)

Original File Name: USC Comments.zip

Date and Time Comment Was Submitted: 2008-05-09 08:49:17

No Duplicates.

**Comment 22 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Ralph

Last Name: Moran

Email Address: Ralph.Moran@bp.com

Affiliation: BP America, Inc.

Subject: BP LCFS Comments

Comment:

Attached are BP's comments on CARB's Proposed Concept Outline for the LCFS. We have also included our general comments and recommendations on the current direction of the LCFS design.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/23-bp\\_response\\_to\\_carb\\_lcfs\\_5\\_08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/23-bp_response_to_carb_lcfs_5_08.pdf)

Original File Name: BP response to CARB LCFS 5 08.pdf

Date and Time Comment Was Submitted: 2008-05-09 16:33:08

No Duplicates.

**Comment 23 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Roland

Last Name: Hwang

Email Address: rhwang@nrdc.org

Affiliation: NRDC

Subject: NRDC comments on CARB March LCFS concept paper

Comment:

Please find attached NRDC's comments on the ARB's March 2008 concept paper for the LCFS. If you have any questions, please do not hesitate to contact me.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/24-nrdc\\_comments\\_carb\\_lcfs\\_3\\_08\\_concept\\_5\\_23\\_08\\_final.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/24-nrdc_comments_carb_lcfs_3_08_concept_5_23_08_final.doc)

Original File Name: NRDC comments CARB LCFS 3 08 Concept 5 23 08\_Final.doc

Date and Time Comment Was Submitted: 2008-05-27 07:55:47

No Duplicates.

**Comment 24 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Dennis

Last Name: Hall

Email Address: DHall@alac.org

Affiliation: American Lung Association

Subject: Response to CARB's LCFS Concept Proposal

Comment:

Thank you for your patience as ALAC develops its response to CARB's Concept Proposal for a Low-Carbon Fuel Standard. We look forward to working with you on this important policy.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/25-strawman\\_response\\_letter\\_5-30-08\\_final.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/25-strawman_response_letter_5-30-08_final.pdf)

Original File Name: Strawman Response Letter 5-30-08 FINAL.pdf

Date and Time Comment Was Submitted: 2008-05-30 13:18:34

No Duplicates.



**Comment 25 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Mark

Last Name: Capron

Email Address: markcapron@podenergy.org

Affiliation: POD Energy

Subject: Comments for the LCFS Concept Outline

Comment:

This is a resubmission, replacing comment #11.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/26-comments\\_on\\_lc\\_fuel\\_standard\\_\\_apr-08.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/26-comments_on_lc_fuel_standard__apr-08.doc)

Original File Name: Comments on LC fuel standard, Apr-08.doc

Date and Time Comment Was Submitted: 2008-05-30 13:49:53

No Duplicates.

**Comment 26 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Ellen

Last Name: Shapiro

Email Address: [eshapiro@autoalliance.org](mailto:eshapiro@autoalliance.org)

Affiliation: Alliance of Automobile Manufacturers

Subject: Alliance comments on draft LCFS Outline

Comment:

Attached please find Alliance comments on CARB's draft LCFS concept paper released in March. We hope you find them useful. Please let me know if you have any questions or require any clarification.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/27-alliance\\_comments\\_on\\_carb\\_lcfs\\_outline\\_final\\_12\\_june\\_2008.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/27-alliance_comments_on_carb_lcfs_outline_final_12_june_2008.pdf)

Original File Name: Alliance Comments on CARB LCFS Outline final 12 June 2008.pdf

Date and Time Comment Was Submitted: 2008-06-13 13:04:18

No Duplicates.

**Comment 27 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

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

Subject: WSPA Proposed Concept Outline for the CA LCFS Regulation  
Comment:

The Western States Petroleum Association (WSPA) would like to provide comments on the recently released Proposed Concept Outline for the CA LCFS Regulation and the proposals discussed during the March 25 LCFS Workshop. Please see attached. Thank you.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/28-wspa\\_comments.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/28-wspa_comments.zip)

Original File Name: WSPA comments.zip

Date and Time Comment Was Submitted: 2008-06-20 10:13:26

No Duplicates.

**Comment 28 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Jim

Last Name: Uihlein

Email Address: JUIH@chevron.com

Affiliation: Chevron

Subject: Suggestions for LCFS calculation

Comment:

At the recent LCFS Credit and Carbon Intensity Calculations Sub-Working Group meeting we talked about how the calculations would be done for multiple fuels, and I offered to put together some example calculations to show that a more direct approach would work. The attachment contains comments and example calculations. Please let me know if you have any questions or comments.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/29-chevron\\_lcfs\\_calculations.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/29-chevron_lcfs_calculations.doc)

Original File Name: Chevron\_LCFS Calculations.doc

Date and Time Comment Was Submitted: 2008-06-23 13:38:01

No Duplicates.

**Comment 29 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Christina  
Last Name: Zhang-Tillman  
Email Address: czhangti@arb.ca.gov  
Affiliation: ARB

Subject: LCFS June 10th sub-group paper  
Comment:

This is an attachment for comment #28.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/30-sub-wg-calculations\\_06102008.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/30-sub-wg-calculations_06102008.pdf)

Original File Name: Sub-WG-Calculations\_06102008.pdf

Date and Time Comment Was Submitted: 2008-06-25 10:08:54

No Duplicates.

## **Comment 30 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Taylor  
Last Name: Miller  
Email Address: TMiller@Sempra.com  
Affiliation: Sempra Energy

Subject: Sempra Energy comments concerning LCFS concept outline  
Comment:

LCFS Team,

Sempra Energy generally supports the comments provided by the California Natural Gas Vehicle Coalition (CNGVC) and the California Electric Transportation Coalition (CaETC) on the Low Carbon Fuel Standard (LCFS) proposed concept outline dated March 2008. In lieu of sending you a separate letter reiterating the points raised by each Coalition, we would simply like to let you know we fully support the comments enumerated by each group. Our position concerning carbon intensity calculation is set forth in my letter to John Curtis dated June 9, 2008.

We look forward to working with each of you on the continued development of this regulation, and if you have any questions, please do not hesitate contacting me or our Manager of Clean Transportation, Bill Zobel at 858-654-8374, or 858-752-1435 (c).

Taylor Miller

Taylor O. Miller  
Senior Environmental Counsel  
Sempra Energy  
925 L Street, Suite 650  
Sacramento, CA 95814  
Tel: (916) 492-4248

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-06-25 10:13:24

No Duplicates.

## **Comment 31 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Tom

Last Name: Koehler

Email Address: tomk@pacificethanol.net

Affiliation:

Subject: Policy

Comment:

If oil is responsible for 75% of the market mediated impacts of higher corn prices as Wally Tyner from Purdue suggests, then oil should bear 75% of any indirect land use impacts associated with higher corn prices and ethanol production. So if indirect land use impacts are 40 g/mj then 30g/mj should be allocated to the oil life cycle and 10g/mj should be allocated to the ethanol lifecycle.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-01 10:47:18

No Duplicates.

**Comment 32 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Greg

Last Name: Adams

Email Address: GAdams@lacsds.org

Affiliation: Los Angeles County Sanitation Districts

Subject: Comments for LCFS Concept Outline

Comment:

Greg Adams of the Los Angeles County Sanitation Districts is submitting the following comments document.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/33-la\\_county\\_sanitation\\_district\\_low\\_carbon\\_fuel\\_standard\\_comments.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/33-la_county_sanitation_district_low_carbon_fuel_standard_comments.pdf)

Original File Name: LA County Sanitation District\_Low Carbon Fuel Standard Comments.pdf

Date and Time Comment Was Submitted: 2008-07-15 15:04:49

No Duplicates.



**Comment 33 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: William

Last Name: Zobel

Email Address: wzobel@semprautilities.com

Affiliation: California Natural Gas Vehicle Coalition

Subject: Comments for the LCFS Concept Outline

Comment:

Comments submitted for the March 2008 LCFS Concept Outline.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/34-cngvc\\_comments.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/34-cngvc_comments.zip)

Original File Name: CNGVC comments.zip

Date and Time Comment Was Submitted: 2008-08-12 15:42:36

No Duplicates.

**Comment 34 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 2nd Workshop.**

First Name: Brian

Last Name: Bonner

Email Address: BONNERBB@airproducts.com

Affiliation: Air Products

Subject: Comments for the LCFS Concept Outline

Comment:

Attached is some comment in regards to the proposed California Low Carbon Fuel Standard regulation as it pertains to the lifecycle analysis.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/36-airproducts\\_comment.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/36-airproducts_comment.pdf)

Original File Name: AirProducts Comment.pdf

Date and Time Comment Was Submitted: 2008-08-29 13:01:29

No Duplicates.

**Comment 35 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

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

**Comment 36 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 4th Workshop.**

First Name: Catherine

Last Name: Reheis-Boyd

Email Address: cathy@wspa.org

Affiliation: Western States Petroleum Association

Subject: WSPA Comments Regarding ARB's Proposal to Adopt a Low  
Comment:

See Attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/38-090308wspa.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/38-090308wspa.pdf)

Original File Name: 090308WSPA.pdf

Date and Time Comment Was Submitted: 2008-09-04 09:43:12

No Duplicates.

**Comment 37 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Brian

Last Name: Bonner

Email Address: BONNERBB@airproducts.com

Affiliation: Air Products

Subject: Comments for the LCFS Draft Regulation

Comment:

I spoke briefly with John Courtis regarding our concern on how an alternative fuel blend like hydrogen-compressed natural gas (HCNG) will be addressed in the LCFS draft regulation that applies to alternative fuels. Per John's direction enclosed is formal comment on behalf of Air Products Hydrogen Energy Systems to the pending LCFS draft regulation.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/39-carb\\_ab32\\_lcfs\\_\\_apci\\_comment\\_15\\_oct\\_08\\_.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/39-carb_ab32_lcfs__apci_comment_15_oct_08_.pdf)

Original File Name: CARB AB32 LCFS (APCI Comment 15 Oct 08).pdf

Date and Time Comment Was Submitted: 2008-10-16 08:24:46

No Duplicates.

**Comment 38 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Lesley

Last Name: Brown Garland

Email Address: [exec@westernpga.org](mailto:exec@westernpga.org)

Affiliation: Western Propane Gas Association

Subject: Comments for Draft LCFS Regulation

Comment:

Attached to this email is a document outlining some of the questions and concerns from the propane industry regarding the low carbon fuel standard proposal.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/40-lcfs\\_letter\\_to\\_arb\\_october\\_2008\\_western\\_propane\\_gas\\_association.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/40-lcfs_letter_to_arb_october_2008_western_propane_gas_association.pdf)

Original File Name: LCFS Letter to ARB October 2008\_Western Propane Gas Association.pdf

Date and Time Comment Was Submitted: 2008-10-17 10:26:56

No Duplicates.

**Comment 39 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Steve

Last Name: Brink

Email Address: [steveb@foresthealth.org](mailto:steveb@foresthealth.org)

Affiliation: California Forestry Association

Subject: Comments for the LCFS Draft Regulation

Comment:

Comments attached

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/41-081019\\_letter\\_cfa\\_to\\_carb\\_on\\_low\\_carbon\\_policy.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/41-081019_letter_cfa_to_carb_on_low_carbon_policy.doc)

Original File Name: 081019\_letter\_CFA\_to\_CARB\_on\_low\_carbon\_policy.doc

Date and Time Comment Was Submitted: 2008-10-20 08:37:23

No Duplicates.

**Comment 40 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Aadik

Last Name: Shekar

Email Address: as@khoslaventures.com

Affiliation:

Subject: Vinod Khosla's White Paper on AB32 and LCFS

Comment:

White paper on AB 32 (with a focus on the LCFS.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/42-ab32-final.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/42-ab32-final.pdf)

Original File Name: AB32-Final.pdf

Date and Time Comment Was Submitted: 2008-11-04 15:55:45

No Duplicates.



**Comment 41 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Brooke

Last Name: Coleman

Email Address: bcoleman@newfuelsalliance.org

Affiliation: New Fuels Alliance

Subject: Comments to the Draft California LCFS Regulation

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/43-newfuelsalliance.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/43-newfuelsalliance.pdf)

Original File Name: newfuelsalliance.pdf

Date and Time Comment Was Submitted: 2008-11-05 11:25:39

No Duplicates.

**Comment 42 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

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

**Comment 43 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Ryan

Last Name: Harty

Email Address: RHarty@hra.com

Affiliation: Honda R&D Americas, Inc

Subject: Comments for the October LCFS Draft Regulation

Comment:

Please find attached comments on the LCFS Draft Regulation, as well as the LCFS supporting reports and GREET analysis that form the background of the LCFS Draft Regulation.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/48-lcfs\\_comments\\_to\\_arb\\_-\\_honda\\_r\\_d\\_americas\\_\\_inc\\_7nov08-rev1.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/48-lcfs_comments_to_arb_-_honda_r_d_americas__inc_7nov08-rev1.pdf)

Original File Name: LCFS Comments to ARB - Honda R&D Americas, Inc 7Nov08-Rev1.pdf

Date and Time Comment Was Submitted: 2008-11-13 11:18:36

No Duplicates.

**Comment 44 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

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

**Comment 45 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Remy

Last Name: Garderet

Email Address: remy.garderet@einow.org

Affiliation: Energy Independence Now

Subject: Comments for the October Draft LCFS Regulation

Comment:

Attached is a letter from EIN on the Draft LCFS regulation.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/50-ein\\_submission\\_on\\_draft\\_regulation.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/50-ein_submission_on_draft_regulation.pdf)

Original File Name: EIN Submission on Draft regulation.pdf

Date and Time Comment Was Submitted: 2008-11-14 10:19:38

No Duplicates.

**Comment 46 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Remy

Last Name: Garderet

Email Address: remy.garderet@einow.org

Affiliation: Energy Independence Now

Subject: Comments for October Draft LCFS Regulation

Comment:

Attached please find comments on the LCFS draft regulation, from Energy Independence Now.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/51-ein\\_20submission\\_20on\\_20draft\\_20regulation.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/51-ein_20submission_20on_20draft_20regulation.pdf)

Original File Name: EIN%20Submission%20on%20Draft%20regulation.pdf

Date and Time Comment Was Submitted: 2008-11-14 10:47:30

No Duplicates.

**Comment 47 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Randy

Last Name: Armstrong

Email Address: randy.armstrong@shell.com

Affiliation: Shell Oil Company

Subject: Comments for the October LCFS Draft Regulation

Comment:

Thank you for letting Shell have this opportunity to comment on California Air Resource Board's draft Low Carbon Fuel Standard.

Attached is the document that includes our comments on the Air Resources Board's draft "California Low Carbon Fuel Standard (October 2008)".

You may contact Clay Calkin at 925-313-3321 if you have any questions concerning these comments.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/52-shell\\_comments\\_on\\_draft\\_lcfs\\_final\\_1114081.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/52-shell_comments_on_draft_lcfs_final_1114081.doc)

Original File Name: Shell comments on draft lcfs final 1114081.doc

Date and Time Comment Was Submitted: 2008-11-14 10:57:32

No Duplicates.

**Comment 48 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Chuck

Last Name: White

Email Address: cwhite1@wm.com

Affiliation: Waste Management

Subject: Comments for the October LCFS Draft Regulation

Comment:

Please accept the attached comments from WM on the proposed Draft LCFS. Please let me know if you have any questions regarding our comments or require further information.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/53-wastemanagement.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/53-wastemanagement.zip)

Original File Name: WasteManagement.zip

Date and Time Comment Was Submitted: 2008-11-14 11:58:22

No Duplicates.



**Comment 49 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

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

**Comment 50 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Neville

Last Name: Fernandes

Email Address: Neville.Fernandes@nesteoil.com

Affiliation: Neste Oil

Subject: Comments for the October LCFS Draft Regulation

Comment:

Attached please find:

(i) Neste Oil Comments to Proposed California Low Carbon Fuel Standard Regulation.

(ii) Attachment A to our comments: Neste Oil's Sustainability Principles for Biofuels

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/55-neste\\_oil\\_comments.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/55-neste_oil_comments.zip)

Original File Name: Neste Oil comments.zip

Date and Time Comment Was Submitted: 2008-11-14 13:11:44

No Duplicates.

**Comment 51 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Charles

Last Name: (Unknown)

Email Address: sushibar@excite.com

Affiliation:

Subject: Comments for the October Draft LCFS Regulation

Comment:

The attachment is a series of five different comments.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/56-charles\\_comments\\_on\\_lcfs.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/56-charles_comments_on_lcfs.zip)

Original File Name: CHARLES\_comments on LCFS.zip

Date and Time Comment Was Submitted: 2008-11-14 13:28:01

No Duplicates.

**Comment 52 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

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

## Comment 53 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.

First Name: Garrett

Last Name: Stone

Email Address: garrett.stone@aspirecorp.net

Affiliation: ASPIRE CORP

Subject: Comments to the Draft Regulation and Supporting Document presented Oct 16 2008

Comment:

Comments are with reference to the Draft Regulation posted here:  
[http://www.arb.ca.gov/fuels/lcfs/101008lcfsreg\\_draft.pdf](http://www.arb.ca.gov/fuels/lcfs/101008lcfsreg_draft.pdf)

And to the Supporting Document posted here:  
[http://www.arb.ca.gov/fuels/lcfs/101608lcfs\\_supdoc.pdf](http://www.arb.ca.gov/fuels/lcfs/101608lcfs_supdoc.pdf)

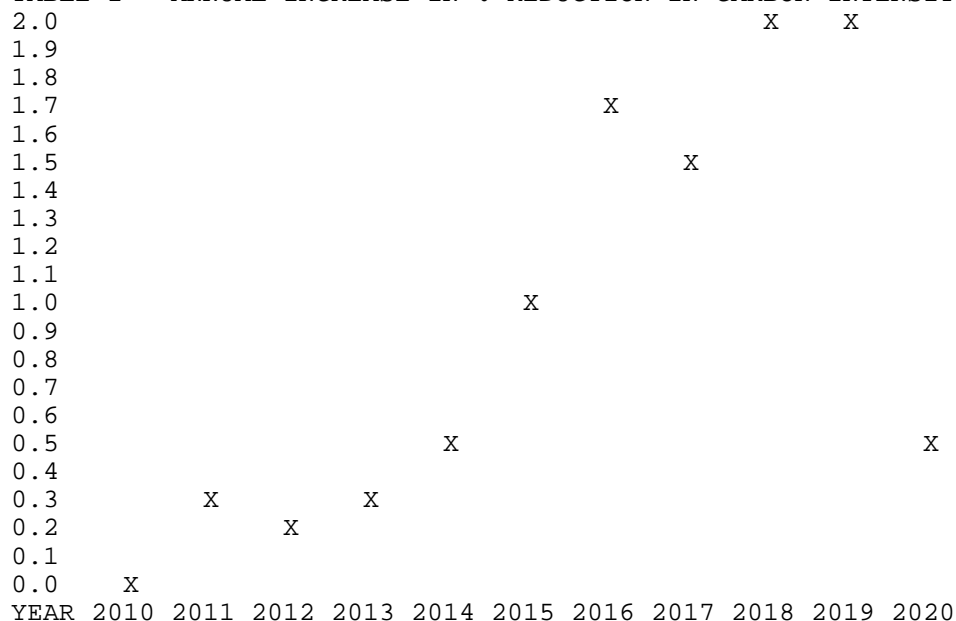
### FIRST COMMENT

With reference to Draft Regulation Table 2, page 4

We recommend that Table 2 LCFS Compliance Schedule for Diesel Fuel, (and Table 1 on page 3 for Gasoline Fuel) be modified to require a smooth decrease in fuel Carbon Intensity.

We believe that the ANNUAL INCREASE in the amount of DECREASE in fuel Carbon Intensity on a fleet-wide basis is more likely to be a smooth curve rather than one that first jumps up and then back down three separate times (2011 to 2012, 2016 to 2017, and 2019 to 2020) as does the Compliance Schedule presented in Table 2. This point is especially clear when the proposed amount of ANNUAL INCREASE as shown in the Compliance Schedule is presented in chart form such as the one below.

TABLE 2 - ANNUAL INCREASE IN % REDUCTION IN CARBON INTENSITY



No doubt it is good policy to start with small annual reductions as low carbon fuels are introduced and then increase the size of the annual reductions as low carbon fuels gain wider use. However, unless there is a policy driven reason to require only a tiny annual reduction of 0.5% in the "final year" of 2020, it seems to be a better fit with the natural world to start with small reductions and steadily increase the size of the annual reduction. After all, each annual reduction is a "per cent of the baseline CO2 emission" so there is no "per cent of a per cent" issue here. And, steadily increasing the annual reduction makes sense. As low carbon fuels gain market share you would expect that a 2.0% reduction in 2020 would become as easy to make as a 0.2% reduction in 2011. With growing use of low carbon fuel, it seems unlikely that any later year would have a smaller reduction than an earlier year. It is also unlikely that the reduction curve would reach a "flat top" (see 2018 and 2019 in the chart) in any year prior to the "final year". In fact, given steadily increasing use of low carbon fuels, it seems most likely that the largest annual reduction would occur in the "final year". Especially since 2020 is not really "a final year" at all, just a milestone on the way to 2050.

#### SECOND COMMENT

With reference to Table 3, page 12 of the Supporting Document:

LINE 3 Average Corn Ethanol CI = 68.2 LUC = 35 Total CI = 103.2

Comment: The only apparent reference for Carbon Intensity of Corn Ethanol on the CARB website is the one released 04/23/08:  
[http://www.arb.ca.gov/fuels/lcfs/042308lcfs\\_eto.pdf](http://www.arb.ca.gov/fuels/lcfs/042308lcfs_eto.pdf).

The bottom line of the table on page 6 of the 04/23/08 document specifies a TWW CI for denatured corn ethanol of 75.6 g/MJ (dry mill) and 89.0 g/MJ (wet mill). A non-weighted average of those two values is 82.3 g/MJ and the Total CI, using 35 g/MJ for LUC, would be 117.3 g/MJ.

What is the source for the new 68.2 g/MJ value for CI? Can you post the supporting calculation?

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/58-comments\\_in\\_response\\_to\\_the\\_draft\\_regulation\\_10-24-08.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/58-comments_in_response_to_the_draft_regulation_10-24-08.doc)

Original File Name: Comments in Response to the Draft Regulation 10-24-08.doc

Date and Time Comment Was Submitted: 2008-11-14 16:01:20

No Duplicates.

**Comment 54 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Tessa

Last Name: Barron

Email Address: tbarron@calstrat.com

Affiliation: NextFuels

Subject: Comments for the October Draft LCFS Regulation

Comment:

Please find attached Comments for Draft LCFS Regulation

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/59-nextfuels\\_comments\\_for\\_draft\\_lcfs\\_regulation\\_11\\_14\\_08.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/59-nextfuels_comments_for_draft_lcfs_regulation_11_14_08.doc)

Original File Name: NextFuels Comments for Draft LCFS Regulation 11\_14\_08.doc

Date and Time Comment Was Submitted: 2008-11-14 16:57:21

No Duplicates.

**Comment 55 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Kiowa

Last Name: Borja

Email Address: kiowa@pricecon.com

Affiliation: California CNG Vehicle Coalition

Subject: Updated Comments for the October Draft LCFS Regulation

Comment:

Please replace the previous version of the comments sent earlier today with the attached cover letter and CNGVC comments on draft LCFS Regulations. In the revised comments attachment included in this email we have noted that the comments do NOT reflect the position of Pacific Gas And Electric Company. I will mail out a hard copy of the revised comments and include a note that they should replace the comments mailed out earlier.

Thank you for your attention to our email.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/60-cngvc\\_lcfs\\_comments.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/60-cngvc_lcfs_comments.zip)

Original File Name: CNGVC\_LCFS Comments.zip

Date and Time Comment Was Submitted: 2008-11-14 17:14:29

No Duplicates.



**Comment 56 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Tim

Last Name: O'Connor

Email Address: toconnor@edf.org

Affiliation: Environmental Defense Fund

Subject: Comments for the October Draft LCFS Regulation

Comment:

Please accept the attached comments on the proposed Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/61-edf\\_lcfs\\_comment\\_letter\\_\\_ - \\_edf\\_comments\\_on\\_proposed\\_regulation.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/61-edf_lcfs_comment_letter__-_edf_comments_on_proposed_regulation.pdf)

Original File Name: EDF\_LCFS Comment Letter - EDF comments on proposed regulation.pdf

Date and Time Comment Was Submitted: 2008-11-14 17:16:59

No Duplicates.

**Comment 57 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

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

**Comment 58 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Rahul

Last Name: Iyer

Email Address: rahul.iyer@primafuel.com

Affiliation: Primafuel, Inc.

Subject: Comments for the October Draft LCFS Regulation

Comment:

Please find the attached document containing comments from Primafuel regarding the October LCFS draft.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/63-primafuel-lcfscomments-20081114.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/63-primafuel-lcfscomments-20081114.pdf)

Original File Name: Primafuel-LCFScomments-20081114.pdf

Date and Time Comment Was Submitted: 2008-11-14 17:22:06

No Duplicates.

**Comment 59 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Todd

Last Name: Campbell

Email Address: tcampbell@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: Comments for the October LCFS Draft Regulation

Comment:

Thank you for considering our comments for the Draft LCFS! Look forward to continuing our work with you and CARB staff on this important regulation! We will mail the hard copy on Monday!

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/64-clean\\_energy\\_\\_comments\\_on\\_draft\\_reg\\_11.14.08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/64-clean_energy__comments_on_draft_reg_11.14.08.pdf)

Original File Name: Clean Energy\_ Comments on Draft Reg 11.14.08.pdf

Date and Time Comment Was Submitted: 2008-11-14 17:34:04

No Duplicates.

**Comment 60 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: David

Last Name: Modisette

Email Address: Dave@ppallc.com

Affiliation: California Electric Transportation Coali

Subject: Updated comments for the October Draft LCFS Regulation

Comment:

This is an updated comment letter to the one previously submitted.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/65-caletc\\_comments\\_on\\_the\\_october\\_draft\\_lcfs\\_regulations\\_\\_november\\_14\\_\\_2008.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/65-caletc_comments_on_the_october_draft_lcfs_regulations__november_14__2008.doc)

Original File Name: CalETC Comments on the October Draft LCFS regulations, November 14, 2008.doc

Date and Time Comment Was Submitted: 2008-11-14 17:43:36

No Duplicates.

**Comment 61 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Freda

Last Name: Fung

Email Address: [freda@theicct.org](mailto:freda@theicct.org)

Affiliation: International Council on Clean Transport

Subject: Comments for the October Draft LCFS Regulation

Comment:

The ICCT appreciates the opportunity to respond to ARB's request for feedback on the draft LCFS regulation. Please find attached our comments and recommendations on the draft regulation. Please feel free to contact me should you wish to discuss these comments in more details.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/66-icct\\_comments\\_on\\_lcfs\\_draft\\_regulation.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/66-icct_comments_on_lcfs_draft_regulation.pdf)

Original File Name: ICCT comments on LCFS draft regulation.pdf

Date and Time Comment Was Submitted: 2008-11-17 08:38:16

No Duplicates.

**Comment 62 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Tudor

Last Name: Williams

Email Address: tudor@cambrianenergy.com

Affiliation: Cambrian Energy Development

Subject: Comments for the October Draft LCFS Regulation

Comment:

Enclosed you will find Cambrian's comments on the Draft LCFS Regulations. We have talked to some of our potential CNG clients about using landfill gas and other biogas resources and believe that these changes would greatly facilitate our activities. Thank you, Tudor Williams partner Cambrian Energy, and a managing member of Dallas Clean Energy.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/67-cambrian\\_energy\\_develop\\_carb\\_letter.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/67-cambrian_energy_develop_carb_letter.pdf)

Original File Name: CAMBRIAN\_ENERGY\_DEVELOP\_CARB letter.pdf

Date and Time Comment Was Submitted: 2008-11-17 08:42:40

No Duplicates.

**Comment 63 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Simon

Last Name: Mui

Email Address: smui@nrdc.org

Affiliation: Natural Resources Defense Council

Subject: Comments for the October Draft LCFS Regulation

Comment:

Thank you for your willingness to extend the deadline. I am formally submitting comments on behalf of all of us at NRDC. We thank you for all your efforts thus far in developing the LCFS and look forward to continuing the dialogue.

I have attached two documents: our comments in response to October's Draft LCFS Regulation and a second document on the lifecycle estimates for different tar sand pathways. We have made available earlier drafts to WSPA, Suncor, as well as other academic researchers in the field. We hope these will be useful to John Curtis and others as they evaluate the non-conventional crude oil pathways.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/68-nrdc\\_lcfs\\_comments.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/68-nrdc_lcfs_comments.zip)

Original File Name: NRDC\_LCFS\_Comments.zip

Date and Time Comment Was Submitted: 2008-11-18 13:23:12

No Duplicates.



**Comment 64 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

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

**Comment 65 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: John

Last Name: Braeutigam

Email Address: John.Braeutigam@valero.com

Affiliation: Valero

Subject: Comments for the October Draft LCFS Regulation

Comment:

Valero's comments on the Draft LCFS Regulations are attached.  
Please call me at (210) 345-2922 if you have any questions.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/70-valero\\_draft\\_lcfs\\_regulations\\_comments.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/70-valero_draft_lcfs_regulations_comments.pdf)

Original File Name: Valero Draft LCFS Regulations Comments.PDF

Date and Time Comment Was Submitted: 2008-11-19 08:39:23

No Duplicates.

**Comment 66 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

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

**Comment 67 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Alexander  
Last Name: Menotti  
Email Address: AMenotti@KelleyDrye.com  
Affiliation: Choren USA

Subject: Comments for the October Draft LCFS Regulation  
Comment:

Please find attached Choren USA's comments on the draft LCFS. I have also attached the Daimler study referenced in our comments.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/72-choren\\_lcfs\\_comments.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/72-choren_lcfs_comments.zip)

Original File Name: CHOREN\_LCFS\_Comments.zip

Date and Time Comment Was Submitted: 2008-11-19 13:29:47

No Duplicates.

**Comment 68 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Bernie

Last Name: Orozco

Email Address: borozco@sempra.com

Affiliation: Semptra Energy

Subject: Comments to the Draft California LCFS Regulation

Comment:

See Attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/73-comments\\_to\\_lcfs\\_reg2.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/73-comments_to_lcfs_reg2.pdf)

Original File Name: comments to LCFS reg2.pdf

Date and Time Comment Was Submitted: 2008-11-19 15:13:01

No Duplicates.

**Comment 69 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Debran

Last Name: Reed

Email Address: DXJones@sempra.com

Affiliation: Sempra Energy

Subject: Comments for the October Draft LCFS Regulation

Comment:

Attached are comments from Sempra Energy on the draft regulations proposed by the California Air Resources Board to implement low carbon fuel standards. We appreciate the opportunity to provide input on this important matter.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/74-sempra\\_carb-se\\_cmts-lcfs\\_regs\\_11.14.8.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/74-sempra_carb-se_cmts-lcfs_regs_11.14.8.pdf)

Original File Name: SEMPRA\_CARB-SE Cmts-LCFS Regs 11.14.8.pdf

Date and Time Comment Was Submitted: 2008-11-19 15:51:44

No Duplicates.

**Comment 70 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

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

**Comment 71 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Jim

Last Name: Uihlein

Email Address: JUIH@chevron.com

Affiliation: Chevron Global Downstream

Subject: Comments for the October Draft LCFS Regulation

Comment:

Attached are the comments from Chevron. Please contact me if you have any questions.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/76-chevron\\_lcfs\\_comments\\_11-19.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/76-chevron_lcfs_comments_11-19.pdf)

Original File Name: CHEVRON\_LCFS Comments 11-19.pdf

Date and Time Comment Was Submitted: 2008-11-19 16:21:30

No Duplicates.



**Comment 72 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Gina

Last Name: Grey

Email Address: gina@wspa.org

Affiliation:

Subject: WSPA Comments on Draft LCFS Regulatory Package

Comment:

Please find attached WSPA's comments on the draft LCFS regulatory package.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/77-wspa\\_comments\\_lcfs\\_reg\\_1108.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/77-wspa_comments_lcfs_reg_1108.pdf)

Original File Name: WSPA Comments LCFS Reg 1108.pdf

Date and Time Comment Was Submitted: 2008-11-19 23:12:14

No Duplicates.

**Comment 73 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Charles

Last Name: Alexander

Email Address: sushibar@excite.com

Affiliation:

Subject: AB32 Scoping Plan comments including LCFS comments

Comment:

All comments are in the seven .rtf files compressed within the attached .zip file.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/78-258-scoping\\_plan\\_comments.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/78-258-scoping_plan_comments.zip)

Original File Name: 258-scoping\_plan\_comments.zip

Date and Time Comment Was Submitted: 2008-11-20 13:54:23

No Duplicates.

**Comment 74 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Mel  
Last Name: Zeldin  
Email Address: melz@capcoa.org  
Affiliation: CAPCOA

Subject: CAPCOA Submittal on the Proposed Scoping Plan (and LCFS)  
Comment:

Please see attached CAPCOA letter to Mary Nichols, Re: CAPCOA Proposal for Joint ARB/Air District Implementation of Stationary Source Measures in the Climate Change Proposed Scoping Plan with Comments on Specific Measures, including the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/79-capcoa\\_563-capcoa\\_comments\\_on\\_scoping\\_plan\\_11-18-08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/79-capcoa_563-capcoa_comments_on_scoping_plan_11-18-08.pdf)

Original File Name: CAPCOA\_563-capcoa\_comments\_on\_scoping\_plan\_11-18-08.pdf

Date and Time Comment Was Submitted: 2008-11-20 14:03:47

No Duplicates.

**Comment 75 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Joseph

Last Name: Sparano

Email Address: lisa@wspa.org

Affiliation: Western States Petroleum Association

Subject: WSPA Comments on AB 118 Revised CEC Regulatory Language (including comments for LCFS)

Comment:

The Western States Petroleum Association (WSPA) is pleased to submit the attached comments regarding AB 118 on the Revised CEC Regulatory Language and CARB's Air Quality Improvement Program.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/80-ab\\_118\\_guidelines\\_and\\_investment\\_plans\\_111308.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/80-ab_118_guidelines_and_investment_plans_111308.pdf)

Original File Name: AB 118 Guidelines and Investment Plans 111308.pdf

Date and Time Comment Was Submitted: 2008-11-20 16:47:57

No Duplicates.

**Comment 76 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Geoff

Last Name: Cooper

Email Address: GCooper@ethanolrfa.org

Affiliation: Renewable Fuels Association

Subject: Comments for the October Draft LCFS Regulation

Comment:

Attached please find the Renewable Fuels Association's comments in response to the information presented at CARB's workshop on Oct. 16 and the documentation released at the same time.

Additionally, we are requesting an opportunity to provide verbal comments at the Dec. 2 workshop. Tom Darlington, of Air Improvement Resource, would be providing verbal comments on our behalf. Please let us know if Tom can be added to the agenda and if he would be able to use PowerPoint slides.

As always, thank you for the opportunity to provide comment. We appreciate the openness of this process and thank CARB for its careful consideration of stakeholder input.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/81-rfa\\_comments\\_to\\_carb\\_on\\_oct.\\_16\\_workshop.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/81-rfa_comments_to_carb_on_oct._16_workshop.pdf)

Original File Name: RFA Comments to CARB on Oct. 16 Workshop.pdf

Date and Time Comment Was Submitted: 2008-11-21 13:23:59

No Duplicates.

**Comment 77 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

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

Subject: Comments for the October 16 Draft LCFS Regulation  
Comment:

Attached are BP's comments to the latest CARB draft regulation.  
Look forward to discussing with you in more detail. Thanks.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/82-bp\\_lcfs\\_comment\\_ltr\\_to\\_carb\\_11\\_08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/82-bp_lcfs_comment_ltr_to_carb_11_08.pdf)

Original File Name: BP LCFS Comment Ltr to CARB 11 08.pdf

Date and Time Comment Was Submitted: 2008-11-24 16:04:10

No Duplicates.

**Comment 78 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Nadia

Last Name: Scipio del Campo

Email Address: nadia.scipiodelcampo@international.gc.ca

Affiliation: Consulate General of Canada

Subject: Comments for the October Draft LCFS Regulation

Comment:

On behalf of the Canadian Embassy in Washington, attached are Government of Canada comments on the draft regulations.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/83-letter\\_to\\_chair\\_nichols\\_from\\_canadian\\_ambassador\\_14\\_nov\\_2008.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/83-letter_to_chair_nichols_from_canadian_ambassador_14_nov_2008.pdf)

Original File Name: Letter to Chair Nichols from Canadian Ambassador 14 Nov 2008.pdf

Date and Time Comment Was Submitted: 2008-11-26 09:47:05

No Duplicates.

**Comment 79 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Daniel

Last Name: Sinks

Email Address: H.Daniel.Sinks@conocophillips.com

Affiliation: ConocoPhillips

Subject: Revised Comments for the October Draft LCFS Regulation

Comment:

Attached please find a a revised version of the comments we submitted regarding the LCFS on 11/19.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/84-conoco\\_phillips\\_lcfs\\_comments\\_revised.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/84-conoco_phillips_lcfs_comments_revised.pdf)

Original File Name: Conoco\_Phillips\_LCFS Comments\_revised.pdf

Date and Time Comment Was Submitted: 2008-11-26 10:19:14

No Duplicates.



**Comment 80 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Bonnie

Last Name: Holmes-Gen

Email Address: bhgen@alac.org

Affiliation: American Lung Association of California

Subject: Comments for the October Draft LCFS Regulation

Comment:

See attached comments from various environmental groups.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/85-envgrps-lcfs-draft-reg-comments-11-14-08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/85-envgrps-lcfs-draft-reg-comments-11-14-08.pdf)

Original File Name: EnvGrps-LCFS-draft-reg-comments-11-14-08.pdf

Date and Time Comment Was Submitted: 2008-12-02 09:22:09

No Duplicates.

**Comment 81 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 5th Workshop.**

First Name: Danielle

Last Name: Fugere

Email Address: dfugere@foe.org

Affiliation: Friends of the Earth

Subject: Support of Minimum Environmental Protections

Comment:

Attached please find a comment on the Draft Regulation.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/86-2k8\\_lcfs\\_rfs\\_group\\_comment.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/86-2k8_lcfs_rfs_group_comment.doc)

Original File Name: 2k8 LCFS RFS Group Comment.doc

Date and Time Comment Was Submitted: 2008-12-02 10:25:18

No Duplicates.

## **Comment 82 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Meera

Last Name: Balakumar

Email Address: meera.balakumar@gmail.com

Affiliation: Environmental Entrepreneurs

Subject: Comments for the October LCFS Draft Regulation

Comment:

Attached please find a letter addressed to Chairman Nichols and composed by Environmental Entrepreneurs framing proposals with regard to the LCFS / ILUC.

In summary, E2 believes that CARB can encourage clean energy solutions for the medium- and long-term within a transparent market framework through (i) a comprehensive evaluation system that encourages high-value energy crops and categorically discourages potential negative effects in the production of biofuels, (ii) the separation of the carbon value attributed to various fuels from each fuel's inherent fuel value, and (iii) the requirement that all biomass facilities be certified.

We are requesting clarification as to which portions of our proposals (please see attached letter) are already contained within the LCFS draft and which can be accommodated if not already contained therein.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/87-environmental\\_entrepreneurs\\_lcfs\\_iluc\\_december\\_2\\_2008.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/87-environmental_entrepreneurs_lcfs_iluc_december_2_2008.pdf)

Original File Name: Environmental Entrepreneurs\_LCFS\_ILUC December 2 2008.pdf

Date and Time Comment Was Submitted: 2008-12-08 08:37:47

No Duplicates.

## **Comment 83 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Jeannie

Last Name: Blakeslee

Email Address: jblakesl@arb.ca.gov

Affiliation: CAPCOA

Subject: LCFS Multimedia Evaluation Functional Equivalent (submitted via internal email)

Comment:

Low Carbon Fuel Standard

CAPCOA supports the goal of the Low Carbon Fuel Standard adopted by ARB to reduce the carbon intensity of transportation fuels. However, to ensure that local and regional air quality impacts are not exacerbated in the process and that energy reduction goals are actually realized, extensive analysis will be required prior to development of the implementing regulation, including the following:

1. Evaluation of the toxic and criteria pollutant impacts of biofuels to ensure that public health is not compromised in implementing this measure.
2. Analysis of the impact of biofuels on broader societal issues and how these might affect implementation effectiveness, such as the potential for the regulation to create "domino" effects on grains and crops that ultimately affect food availability and cost.
3. Development of better tools to assess and audit land use implications of the various strategies, such as potential conversion of pastures, rainforests and other existing carbon sinks to fuel production and how that will affect the global carbon balance.
4. Analysis of the potential to increase light-duty vehicle dieselization if a market-based, averaging mechanism for fuel carbon content is used to provide regulatory flexibility.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-10 13:56:41

No Duplicates.

**Comment 84 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Anna

Last Name: Lee

Email Address: alee@cbeocal.org

Affiliation: Communities for Better Environment

Subject: CBE's comments Dec 8 AB 32 PSP 1

Comment:

This is the main comment submitted by Communities for a Better Environment.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/89-communities\\_for\\_better\\_env\\_1500-cbe\\_comments\\_dec\\_08\\_ab32\\_proposed\\_scoping\\_plan.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/89-communities_for_better_env_1500-cbe_comments_dec_08_ab32_proposed_scoping_plan.pdf)

Original File Name: COMMUNITIES FOR BETTER ENV\_1500-cbe\_comments\_dec\_08\_ab32\_proposed\_scoping\_plan.pdf

Date and Time Comment Was Submitted: 2008-12-11 11:16:32

No Duplicates.

**Comment 85 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Tim

Last Name: Hogan

Email Address: THogan@npra.org

Affiliation: National Petrochemical and Refiners Asso

Subject: Comments for Dec. LCFS Draft Reg

Comment:

Attached are comments from the National Petrochemical and Refiners Association.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/90-carb\\_lcfs\\_comments\\_dec2008.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/90-carb_lcfs_comments_dec2008.pdf)

Original File Name: CARB LCFS comments Dec2008.pdf

Date and Time Comment Was Submitted: 2008-12-16 08:56:21

No Duplicates.

**Comment 86 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Kurt

Last Name: Blase

Email Address: kurt@blasegroup.com

Affiliation: Center for North American Energy Securit

Subject: CNAES Comments on LCFS

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/91-final\\_lcfs\\_comments\\_\\_12-16-08\\_.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/91-final_lcfs_comments__12-16-08_.doc)

Original File Name: Final LCFS Comments (12-16-08).doc

Date and Time Comment Was Submitted: 2008-12-16 13:59:47

No Duplicates.

**Comment 87 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Eric

Last Name: Knight

Email Address: [eknight@greenearthfuelsllc.com](mailto:eknight@greenearthfuelsllc.com)

Affiliation:

Subject: Written Comments - Draft Low Carbon Fuel Standard Regulation

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/92-green\\_earth\\_fuels\\_-\\_lcfs\\_written\\_comments\\_\\_signed\\_.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/92-green_earth_fuels_-_lcfs_written_comments__signed_.pdf)

Original File Name: Green Earth Fuels - LCFS written comments (signed).pdf

Date and Time Comment Was Submitted: 2008-12-17 13:10:02

No Duplicates.



**Comment 88 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Celia

Last Name: DuBose

Email Address: cdubose@hotmail.com

Affiliation:

Subject: California Biodiesel Alliance Comments re: LCSF

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/93-cba\\_let\\_to\\_arb\\_12.16.08.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/93-cba_let_to_arb_12.16.08.doc)

Original File Name: CBA let to ARB 12.16.08.doc

Date and Time Comment Was Submitted: 2008-12-17 13:11:41

No Duplicates.

**Comment 89 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Rick

Last Name: Hyndman

Email Address: anne.ward@capp.ca

Affiliation: Canadian Asso. of Petroleum Producers

Subject: Comments for Draft LCFS Regulation

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/94-capp\\_edms\\_dec\\_16\\_2008\\_lcfs\\_oct\\_2008\\_draft\\_regulation.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/94-capp_edms_dec_16_2008_lcfs_oct_2008_draft_regulation.pdf)

Original File Name: CAPP\_EDMS\_Dec\_16\_2008\_LCFS\_Oct\_2008\_Draft\_Regulation.PDF

Date and Time Comment Was Submitted: 2008-12-17 13:14:48

No Duplicates.

**Comment 90 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Dean

Last Name: Frommelt

Email Address: d\_frommelt@admworld.com

Affiliation: ADM

Subject: Comments from Dec. 2 LCFS workshop

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/95-20081216\\_adm\\_comments\\_ca\\_lcfs\\_draft.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/95-20081216_adm_comments_ca_lcfs_draft.pdf)

Original File Name: 20081216 ADM Comments CA LCFS Draft.pdf

Date and Time Comment Was Submitted: 2008-12-17 13:17:10

No Duplicates.

**Comment 91 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Tuyen

Last Name: Le

Email Address: TLe@lacsds.org

Affiliation: County Sanitation Districts of LA County

Subject: Comments for Draft LCFS Regulation, December 2008

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/96-comments\\_for\\_draft\\_lcfs\\_regulation\\_december\\_2008\\_version.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/96-comments_for_draft_lcfs_regulation_december_2008_version.pdf)

Original File Name: Comments for Draft LCFS Regulation December 2008 Version.pdf

Date and Time Comment Was Submitted: 2008-12-17 13:24:17

No Duplicates.

**Comment 92 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Gustavo

Last Name: Collantes

Email Address: GustavoC@CTED.WA.GOV

Affiliation: CTED

Subject: Comments for LCFS regulation

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/97-cted\\_comments\\_to\\_lcfs\\_regulation\\_12\\_08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/97-cted_comments_to_lcfs_regulation_12_08.pdf)

Original File Name: CTED comments to LCFS regulation 12 08.pdf

Date and Time Comment Was Submitted: 2008-12-17 13:26:23

No Duplicates.

**Comment 93 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: John

Last Name: Braeutigam

Email Address: John.Braeutigam@valero.com

Affiliation: Valero

Subject: Comments from Dec 2 LCFS workshop

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/98-valero\\_comments\\_from\\_dec\\_2\\_lcfs\\_workshop.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/98-valero_comments_from_dec_2_lcfs_workshop.pdf)

Original File Name: Valero Comments from Dec 2 LCFS workshop.pdf

Date and Time Comment Was Submitted: 2008-12-17 13:28:08

No Duplicates.

**Comment 94 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Lesley Brown

Last Name: Garland

Email Address: [exec@westernpga.org](mailto:exec@westernpga.org)

Affiliation: Western Propane Gas Association

Subject: Comments for Draft LCFS Regulation

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/99-lcfs\\_letter\\_to\\_arb\\_december\\_2008.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/99-lcfs_letter_to_arb_december_2008.pdf)

Original File Name: LCFS Letter to ARB December 2008.pdf

Date and Time Comment Was Submitted: 2008-12-17 13:30:54

No Duplicates.

**Comment 95 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: H. Daniel

Last Name: Sinks

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

Affiliation: ConocoPhillips

Subject: Comments from Dec 2 LCFS workshop

Comment:

Attached please find our comments regarding the December 2008 Draft LCFS Regulation and workshop materials.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/100-cop\\_lcfs\\_comments\\_12\\_17\\_08\\_.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/100-cop_lcfs_comments_12_17_08_.pdf)

Original File Name: COP LCFS Comments 12\_17\_08\_.pdf

Date and Time Comment Was Submitted: 2008-12-18 08:49:28

No Duplicates.



**Comment 96 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Randy

Last Name: Armstrong

Email Address: randy.armstrong@shell.com

Affiliation: Shell

Subject: Comments for Draft LCFS Regulation

Comment:

Thank you for letting Shell have this opportunity to comment on California Air Resource Board's draft Low Carbon Fuel Standard.

Attached is the document that includes our comments on the Air Resources Board's draft "California Low Carbon Fuel Standard (December 2008)".

You may contact Clay Calkin at 925-313-3321 if you have any questions concerning these comments.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/101-shell\\_comments\\_on\\_december\\_2\\_draft\\_lcfs\\_regs\\_final.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/101-shell_comments_on_december_2_draft_lcfs_regs_final.zip)

Original File Name: Shell comments on December 2 draft lcfs regs final.ZIP

Date and Time Comment Was Submitted: 2008-12-18 09:55:48

No Duplicates.

**Comment 97 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Julie

Last Name: Malinowski-Ball

Email Address: julee@ppallc.com

Affiliation:

Subject: Comments from December 2 LCFS Workshop

Comment:

Please see the attached comments from the California Biomass Energy Alliance (CBEA). Please contact me if you have any questions. -  
Julee

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/102-california\\_biomass\\_alliance.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/102-california_biomass_alliance.zip)

Original File Name: California Biomass Alliance.zip

Date and Time Comment Was Submitted: 2008-12-19 08:23:44

No Duplicates.

**Comment 98 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Jeffrey

Last Name: Clarke

Email Address: jclarke@NGVAmerica.org

Affiliation: NGVAmerica

Subject: Comments on Draft LCFS - Dec. 2008

Comment:

Please accept the attached comments concerning the Dec. 2 draft regulations for the LCFS.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/103-ngvacmtslcfs1208.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/103-ngvacmtslcfs1208.doc)

Original File Name: NGVACmtsLCFS1208.doc

Date and Time Comment Was Submitted: 2008-12-19 11:51:57

No Duplicates.

**Comment 99 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Todd

Last Name: Campbell

Email Address: tcampbell@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: Comments on December Draft of the Low Carbon Fuel Standard

Comment:

Enclosed are Clean Energy's comments on the December Draft of the Low Carbon Fuel Standard. Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/104-clne\\_final\\_comments\\_12.19.08\\_on\\_dec.\\_draftt\\_lcfs\\_reg.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/104-clne_final_comments_12.19.08_on_dec._draftt_lcfs_reg.pdf)

Original File Name: CLNE Final Comments 12.19.08 on Dec. Draftt LCFS Reg.pdf

Date and Time Comment Was Submitted: 2008-12-19 18:25:41

No Duplicates.

**Comment 100 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Edward

Last Name: Kjaer

Email Address: edward.kjaer@sce.com

Affiliation: Southern California Edison

Subject: SCE and PG&E Comments on Low Carbon Fuel Standard, December 19th  
Comment:

Respectfully submitted on behalf of Southern California Edison and Pacific Gas & Electric. Thank you.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/105-sce\\_and\\_pg\\_e\\_comments\\_on\\_low\\_carbon\\_fuel\\_standard\\_dec\\_19\\_\\_\\_\\_.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/105-sce_and_pg_e_comments_on_low_carbon_fuel_standard_dec_19____.pdf)

Original File Name: SCE and PG&E comments on Low Carbon Fuel Standard Dec 19, \_\_.pdf

Date and Time Comment Was Submitted: 2008-12-23 08:47:35

No Duplicates.

**Comment 101 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Chuck

Last Name: White

Email Address: cwhite1@wm.com

Affiliation: Waste Management

Subject: SCE and PG&E Comments on Low Carbon Fuel Standard, December 19th  
Comment:

Please accept WM's attached comments on the LCFS draft regs.  
Please confirm your receipt of these comments. Thank you.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/106-wm\\_lcfs\\_comments\\_12.19.08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/106-wm_lcfs_comments_12.19.08.pdf)

Original File Name: WM LCFS Comments 12.19.08.pdf

Date and Time Comment Was Submitted: 2008-12-23 08:49:18

No Duplicates.

**Comment 102 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Ryan  
Last Name: Harty  
Email Address: rharty@hra.com  
Affiliation: Honda R&D Americas, Inc

Subject: Comments for LCFS Draft Regulation  
Comment:

Hello Manisha,

Thank you very much for the opportunity to comment on the LCFS.

Please consider these comments by Honda:

Thank you very much,

Ryan Harty, P.Eng (AB)  
Honda R&D Americas, Inc  
1900 Harpers Way,  
Torrance, CA  
90501

310-781-6075 phone  
310-781-5655 fax  
310-847-9247 cell  
rharty@hra.com

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/107-lcfs\\_comments\\_to\\_arb\\_-\\_honda\\_r\\_d\\_americas\\_\\_inc\\_19dec08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/107-lcfs_comments_to_arb_-_honda_r_d_americas__inc_19dec08.pdf)

Original File Name: LCFS Comments to ARB - Honda R&D Americas, Inc 19Dec08.pdf

Date and Time Comment Was Submitted: 2008-12-23 08:52:00

No Duplicates.

**Comment 103 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: David  
Last Name: Modisette  
Email Address: Dave@ppallc.com  
Affiliation: CalETC

Subject: CalETC Comments on December LCFS Draft Regulations, part 1  
Comment:

Attached are the CalETC Comments on the December Draft LCFS Regulations, Part 1.

David Modisette

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/108-caletc\\_letterhead-caletc\\_comments\\_on\\_the\\_december\\_lcfs\\_draft\\_regulations\\_\\_part\\_1.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/108-caletc_letterhead-caletc_comments_on_the_december_lcfs_draft_regulations__part_1.doc)

Original File Name: CalETC Letterhead-CalETC Comments on the December LCFS Draft Regulations, Part 1.doc

Date and Time Comment Was Submitted: 2008-12-23 08:54:00

No Duplicates.



**Comment 104 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: PETE

Last Name: PRICE

Email Address: pete@pricecon.com

Affiliation: CNGVC

Subject: Comments rfor Draft LCFS Regulation

Comment:

Please acknowledge receipt of the attached comments from the California Natural Gas Vehicle Coalition. Thank you.

PETE PRICE

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/109-lcfs--cngvc\\_comments\\_12-08\\_regs\\_final.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/109-lcfs--cngvc_comments_12-08_regs_final.doc)

Original File Name: lcfs--cngvc comments 12-08 regs final.doc

Date and Time Comment Was Submitted: 2008-12-23 08:57:46

No Duplicates.

**Comment 105 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

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

Subject: Chevron Comments on the December Draft LCFS Regulations  
Comment:

Attached are comments from Chevron. Please contact me if you have any questions.

Thanks ,

Jim Uihlein  
Fuels Technology Advisor  
Chevron Global Downstream  
(760) 731-0361  
[juih@chevron.com](mailto:juih@chevron.com)

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/110-cvx\\_lcfs\\_comments\\_12-19.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/110-cvx_lcfs_comments_12-19.pdf)

Original File Name: CVX LCFS Comments 12-19.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:23:10

No Duplicates.

## **Comment 106 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Catherine

Last Name: Dunwoody

Email Address: CDunwoody@CAFCP.org

Affiliation:

Subject: Comments on LCFS as it relates to H2

Comment:

Dear LCFS staff,

Thank you for the opportunity to provide comments regarding the draft LCFS as it relates to hydrogen fuel. Please consider these informal comments - because of the diverse nature of the CaFCP membership, I am unable to gain overall consensus on formal comments. You may also hear from individual members directly.

1. I understand that based on proposed Section 95421(b)(1), providers of hydrogen would be exempt from the LCFS until total aggregate volume of hydrogen sold for transportation in California exceeds 420 million MJ (3.6 million gge) but that hydrogen providers could generate LCFS credits if they choose.
2. Several members agreed that it is appropriate to make the regulated party the owner of the fuel when it is dispensed. I did not receive any negative comments on this point.
3. The lookup table for hydrogen should not default to liquid H2 from natural gas as this cannot be the dominant pathway in California given existing law (SB1505). Instead, use a default pathway that yields SB1505-compliant hydrogen (30% reduction in CO2, 33% renewables etc.) This approach is similar to that used for electricity, for which the look up table value is based on California marginal mix in 2010 (Table 3, page 12 of Supporting Documentation).
4. I understand that providers of hydrogen can justify a lower carbon intensity value than what is included in the lookup table if they can support it for their specific pathway.
5. Using the Honda Clarity's USEPA certified fuel economy data to calculate the FCV EER of 3.0 is appropriate.
6. CARB's LCFS hypothetical compliance scenarios include FCVs ranging from 70,000 to 220,000 vehicles in the total fleet by 2020. These numbers are lower than other scenarios evaluated by the National Research Council[1] and the Oakridge National Laboratory[2]. Although the CaFCP members do not have a consensus recommendation for which numbers to use in a scenario that shows the possibility of ZEVs being more heavily weighted to FCVs, CARB could look to these studies for guidance. Keep in mind these studies clearly state that significant policy and financial incentives would be required to achieve a sustained, high-volume FCV market (also true for other alternative fuels.)

Please let me know if you have further questions or need more input.

Catherine

---

[1] National Academy of Sciences, National Research Council, Transitions to Alternative Vehicle Technologies: A Focus on Hydrogen, 2008, [http://www.nap.edu/catalog.php?record\\_id=12222](http://www.nap.edu/catalog.php?record_id=12222)

[2] Greene, D.L., Leiby, P.N., James, B., Perez, J., Melendez, M., Milbrandt, A., Unnasch, S. and Hooks, M. 2008, March, Transition to Hydrogen Fuel Cell Vehicles & the Potential Hydrogen Energy Infrastructure Requirements, ORNL/TM-2008/30; [http://cta.ornl.gov/cta/Publications/Reports/ORNL\\_TM\\_2008\\_30.pdf](http://cta.ornl.gov/cta/Publications/Reports/ORNL_TM_2008_30.pdf)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-23 10:25:26

No Duplicates.

**Comment 107 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Gina D.

Last Name: Grey

Email Address: gina@wspa.org

Affiliation:

Subject: WSPA Comments Regarding ARB's December 2 LCFS Workshop

Comment:

see attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/112-wspa\\_comments\\_from\\_dec\\_2\\_lcfs\\_workshop.121908-f.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/112-wspa_comments_from_dec_2_lcfs_workshop.121908-f.pdf)

Original File Name: WSPA Comments from Dec 2 LCFS Workshop.121908-f.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:28:27

No Duplicates.

**Comment 108 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Todd R.

Last Name: Campbell

Email Address: tcampbell@cleanenergyfuels.com

Affiliation:

Subject: Comments rfor Draft LCFS Regulation

Comment:

see attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/113-clne\\_12.19.08\\_final\\_comments\\_on\\_draftt\\_lcfs\\_reg.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/113-clne_12.19.08_final_comments_on_draftt_lcfs_reg.pdf)

Original File Name: CLNE 12.19.08 Final Comments on Draftt LCFS Reg.pdf

Date and Time Comment Was Submitted: 2008-12-23 10:32:00

No Duplicates.

**Comment 109 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Cal

Last Name: Hodge

Email Address: A2ndOpinionInc@aol.com

Affiliation: A 2nd Opinion, Inc.

Subject: Comments on Draft LCFS Regulation

Comment:

Attached are A 2nd Opinion, Inc.'s comments on the December draft of the LCFS regulations. Feel free to call me if you have questions.

For A 2nd Opinion, Inc.

Cal Hodge

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/114-a2o\\_comments\\_on\\_december\\_lcfs\\_reg\\_draft.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/114-a2o_comments_on_december_lcfs_reg_draft.pdf)

Original File Name: A2O comments on December LCFS Reg Draft.pdf

Date and Time Comment Was Submitted: 2008-12-24 08:14:42

No Duplicates.

**Comment 110 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Edward  
Last Name: Kjaer  
Email Address: edward.kjaer@sce.com  
Affiliation: Southern California Edison

Subject: SCE and PG&E Comments on Low Carbon Fuel Standard, December 19th  
Comment:

Respectfully submitted on behalf of Southern California Edison and Pacific Gas & Electric. Thank you.

Edward Kjaer  
Director, Electric Transportation  
Southern California Edison  
2244 Walnut Grove Avenue  
Rosemead, CA 91770  
Direct line: 626-302-1324  
Fax: 626-302-1328  
edward.kjaer@sce.com

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/115-sce\\_and\\_pg\\_e\\_comments\\_on\\_low\\_carbon\\_fuel\\_standard\\_dec\\_19\\_\\_\\_\\_.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/115-sce_and_pg_e_comments_on_low_carbon_fuel_standard_dec_19____.pdf)

Original File Name: SCE and PG&E comments on Low Carbon Fuel Standard Dec 19, \_\_.pdf

Date and Time Comment Was Submitted: 2008-12-26 10:57:31

No Duplicates.



**Comment 111 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Marc

Last Name: Breslow

Email Address: marc.breslow@state.ma.us

Affiliation:

Subject: Letter from Mass. Sec. Energy & Envir. Affairs Ian Bowles re LCFS

Comment:

Dear Commissioner/Chair Nichols:

Please see the attached letter from our Secretary of Energy & Environmental Affairs Ian Bowles, in regard to consideration of the impacts of land use change in your development of regulations for the Low Carbon Fuel Standard. Please feel free to contact me if you have any questions. A hard copy will be arriving via regular mail.

Marc Breslow, Ph.D.

Director of Transportation & Buildings Policy

Executive Office of Energy & Environmental Affairs

Commonwealth of Massachusetts

100 Cambridge St., 9th floor, Boston, MA 02114

617-626-1105, marc.breslow@state.ma.us

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/116-bowles\\_to\\_carb\\_re\\_lcfs-land\\_use\\_122308.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/116-bowles_to_carb_re_lcfs-land_use_122308.pdf)

Original File Name: Bowles to CARB re LCFS-land use 122308.pdf

Date and Time Comment Was Submitted: 2008-12-29 08:29:57

No Duplicates.

## **Comment 112 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Matthew

Last Name: Crosby

Email Address: MC4@cpuc.ca.gov

Affiliation:

Subject: CPUC staff comments regarding LCFS regulation of electricity fuel

Comment:

Please find attached comments from CPUC staff members Kristin Ralff-Douglas, Scott Murtishaw, and myself wrt the LCFS draft regulation of electricity fuel. Energy Division director Julie Fitch also had a chance to edit the comments. We hope they are helpful with regard to the regulation of electricity fuel.

Best,

Matthew Crosby

Policy and Planning Division

California Public Utilities Commission

505 Van Ness Avenue

San Francisco, CA 94102

(415) 703-2692

mc4@cpuc.ca.gov

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/117-murtishaw\\_ralff\\_douglas\\_fitch\\_crosby\\_comments.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/117-murtishaw_ralff_douglas_fitch_crosby_comments.doc)

Original File Name: Murtishaw Ralff Douglas Fitch Crosby comments.doc

Date and Time Comment Was Submitted: 2009-01-02 12:32:57

No Duplicates.

**Comment 113 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: David L.  
Last Name: Modisette  
Email Address: Dave@ppallc.com  
Affiliation:

Subject: CalETC Comments on December LCFS Draft Regulations, part 2  
Comment:

Attached are additional (part 2) comments from the California Electric Transportation Coalition on the December, 2008 Draft LCFS Regulations, Part 2.

Thank you for this opportunity to submit comments.

Sincerely,

David L. Modisette  
Executive Director,  
California Electric Transportation Coalition  
1015 K Street, Suite 200  
Sacramento, CA 95814  
phone (916) 441-0702

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/118-caletc\\_comments\\_part\\_2.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/118-caletc_comments_part_2.zip)

Original File Name: CalETC Comments part 2.zip

Date and Time Comment Was Submitted: 2009-01-02 12:36:41

No Duplicates.

**Comment 114 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

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

Subject: Additional Chevron Comments on the December Draft LCFS Regulations  
Comment:

Attached are some additional comments from Chevron. Please contact me if you have any questions.

Thanks,

Jim Uihlein  
Fuels Technology Advisor  
Chevron Global Downstream  
(760) 731-0361  
[juih@chevron.com](mailto:juih@chevron.com)

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/119-cvx\\_lcfs\\_comments\\_12-30.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/119-cvx_lcfs_comments_12-30.pdf)

Original File Name: CVX LCFS Comments 12-30.pdf

Date and Time Comment Was Submitted: 2009-01-02 12:40:09

No Duplicates.

**Comment 115 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Craig

Last Name: Lang

Email Address: mansingh@arb.ca.gov

Affiliation: Iowa Farm Bureau

Subject: RE: California Low Carbon Fuel Standard

Comment:

A hard copy of the comment letter from Craig Lang, President Iowa Farm Bureau was received at ARB. A scanned copy is provided here for public view posting purpose.

Manisha Singh

Air Pollution Specialist

California Air Resources Board

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/120-iowa\\_farm\\_bureau\\_\\_lcfs\\_comments\\_\\_122208.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/120-iowa_farm_bureau__lcfs_comments__122208.pdf)

Original File Name: Iowa Farm Bureau (LCFS Comments) 122208.pdf

Date and Time Comment Was Submitted: 2009-01-13 08:46:50

No Duplicates.

**Comment 116 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 6th Workshop.**

First Name: Shelly

Last Name: Sullivan

Email Address: ssullivan@onemain.com

Affiliation: AB 32 Implementation Group

Subject: LCFS Comments for January 2009 Workshop

Comment:

Attached please find a letter from the AB 32 Implementation Group regarding the implementation process of the LCFS.

If you have any questions or need further information, please feel free to contact AB 32 Executive Director, Shelly Sullivan at (916) 858-8686.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/121-ab32\\_ig\\_lcfs\\_ltr\\_final\\_jan\\_09\\_0](http://www.arb.ca.gov/lists/lcfs-policy-ws/121-ab32_ig_lcfs_ltr_final_jan_09_0)

Original File Name: AB32 IG LCFS Ltr FINAL Jan 09#0

Date and Time Comment Was Submitted: 2009-01-22 12:20:03

No Duplicates.

## **Comment 117 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Nick  
Last Name: Goulette  
Email Address: [nickg@hayfork.net](mailto:nickg@hayfork.net)  
Affiliation: Watershed Research & Training Center

Subject: Re: Comment on Low Carbon Fuel Standard – Incorporation of sustainability into regulation

Comment:

Robert,

We appreciate the opportunity to comment on CARBs draft LCFS. We appreciate your hard work in crafting standards that will be at once ecologically, socially and economically responsible and balanced.

Attached is a letter voicing support and comments from a number of groups from both California and around the West that work on sustainable forest management, woody biomass utilization, rural economic development, and appropriately scaled bioenergy development.

We appreciate your consideration of our comments, and hope that you will use us as a resource in the future in CARBs work to develop standards and rules for sustainable bioenergy development in CA. While an electronic copy of our letter is attached, a hard copy of our comments is in the mail.

Regards,

Nick

Nick Goulette  
Deputy Director  
Watershed Research & Training Center  
Hayfork, CA

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/122-lcfs\\_standard\\_wrtc\\_final.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/122-lcfs_standard_wrtc_final.doc)

Original File Name: LCFS\_Standard\_WRTC\_Final.doc

Date and Time Comment Was Submitted: 2009-02-03 16:30:21

No Duplicates.

**Comment 118 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Gina

Last Name: Grey

Email Address: gina@wspa.org

Affiliation: Western States Petroleum Association

Subject: WSPA Comment Letter on ARB LCFS EERs

Comment:

ARB staff: Please find attached a WSPA letter and report by our contractor EEA regarding the proposed EERs for the LCFS program. We appreciate you placing our submittal in the public comment section of the LCFS portion of the website. Thank you.

--

Gina D. Grey

Policy & Fuels Director, Southwest Manager Western States

Petroleum Association gina@wspa.org

Phone: 480-595-7121

Fax: 480-595-7131

Cell: 602-315-5713

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/123-wspaercomments\\_to\\_arb\\_020209.rev.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/123-wspaercomments_to_arb_020209.rev.doc)

Original File Name: WSPAERcomments to ARB 020209.rev.doc

Date and Time Comment Was Submitted: 2009-02-04 14:08:26

No Duplicates.



## **Comment 119 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Robert  
Last Name: Kirsten  
Email Address: rkirsten@sironafuels.com  
Affiliation: Sirona Fuels

Subject: LCFS Comment  
Comment:

Dear Ms. Singh:

I am an executive of Sirona Fuels, a biodiesel producer in the San Francisco Bay Area. I write today to comment on the draft LCFS regulation as discussed at the January 30, 2009 workshop and to encourage an accelerated timeline for Biodiesel and other diesel alternatives.

I appreciate the change made in the implementation timeline from the December workshop to begin implementation in 2011 but request more be done. According to the California Energy Commission, California is using 43+million gallons of Biodiesel per year. California has nine Biodiesel plants operating, with an estimated total production capacity of 63 million gallons per year; another 4 plants are idle and at least one is under construction. The existing infrastructure is more than capable of meeting the demands of a one percent reduction in carbon intensity beginning January 2010. Furthermore, according to the California Energy Commission, the current AB 118 investment plan will allocate funding towards the development of biodiesel blending and distribution infrastructure. I strongly recommend ARB to revise the implementation timeline for the diesel fuel pool to include more aggressive decreases in carbon beginning in 2010.

Thank you for your consideration of these comments. Should you have any questions or need additional information please call me at 415-244-4046.

Sincerely,

Robert Kirsten

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-18 08:30:15

No Duplicates.

**Comment 120 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Kristopher  
Last Name: Moller  
Email Address: krismoller@gmail.com  
Affiliation: Conserv Fuel

Subject: L.C.S.F. Regulation  
Comment:

Please read the attachment.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/125-cba\\_lcfs\\_template\\_2.11.09.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/125-cba_lcfs_template_2.11.09.doc)

Original File Name: CBA LCFS template 2.11.09.doc

Date and Time Comment Was Submitted: 2009-02-18 08:32:35

No Duplicates.

## **Comment 121 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Jamie  
Last Name: Lutch  
Email Address: admin@simplefuels.com  
Affiliation: Simple Fuels Biodiesel

Subject: Draft Low Carbon Fuel Standard (LCFS) Regulation – Jan. workshop  
Comment:

Dear Ms. Singh:

I am a owner of a small biodiesel production facility in Plumas County.

I write today to comment on the draft LCFS regulation as discussed at the January 30, 2009 workshop and to encourage an accelerated timeline for Biodiesel and other diesel alternatives.

I appreciate the change made in the implementation timeline from the December workshop to begin implementation in 2011 but request more be done. According to the California Energy Commission, California is using 43+million gallons of Biodiesel per year. California has nine Biodiesel plants operating, with an estimated total production capacity of 63 million gallons per year; another 4 plants are idle and at least one is under construction. The existing infrastructure is more than capable of meeting the demands of a one percent reduction in carbon intensity beginning January 2010. Furthermore, according to the California Energy Commission, the current AB 118 investment plan will allocate funding towards the development of biodiesel blending and distribution infrastructure. I strongly recommend ARB to revise the implementation timeline for the diesel fuel pool to include more aggressive decreases in carbon beginning in 2010.

Thank you for your consideration of these comments. Should you have any questions or need additional information please email me.

Sincerely,

Jamie Lutch  
Owner  
Simple Fuels Biodiesel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-18 08:37:55

No Duplicates.

**Comment 122 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Russell

Last Name: Teall

Email Address: RTEALL@aol.com

Affiliation: Biodiesel Industries Inc.

Subject: Draft Low Carbon Fuel Standard (LCFS) Regulation – Jan. workshop

Comment:

Please see the attached comments,

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/127-02-11-09\\_lcfs\\_comment.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/127-02-11-09_lcfs_comment.doc)

Original File Name: 02-11-09 LCFS Comment.doc

Date and Time Comment Was Submitted: 2009-02-18 08:39:32

No Duplicates.

**Comment 123 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Matt

Last Name: Gregori

Email Address: mgregori@renewable-energyproducts.com

Affiliation: Renewable Energy Products LLC

Subject: LCFS Request letter

Comment:

Correspondence attached.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/128-lcfs\\_request\\_mg\\_2-11-09.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/128-lcfs_request_mg_2-11-09.doc)

Original File Name: LCFS Request MG 2-11-09.doc

Date and Time Comment Was Submitted: 2009-02-18 08:41:35

No Duplicates.

## **Comment 124 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Kelly  
Last Name: Olsen  
Email Address: SoCalDisposal@aol.com  
Affiliation:

Subject: LCFS draft  
Comment:

Ms. Singh,

Re: Recommend ARB to revise implementation timeline for diesel fuel pool to include more aggressive decreases in carbon beginning in 2010.

I am a former City Councilman as well as former Chairman of the Planning Commission here in Santa Monica California. I created the first Santa Monica Alternative Fuel Policy for our city in 1992.

I currently serve as an Environmental Programs and Policies Director for a company in the Los Angeles area that has a fleet of trucks running on B99.9 Biodiesel legally made from recycled cooking oil. By using a locally secured and manufactured waste product, this company is substantially reducing green house gasses. Further, the company is reducing California's dependency on foreign fossil fuel.

Our company has become a model for other fleets who also want to make a significant reduction in air pollutants while at the same time supporting the California economy. Biodiesel produced in California from various feedstocks is a great opportunity to make a significant ecological contribution while at the same time providing jobs and a much needed stimulation to our California financial situation.

The Biodiesel industry in California is on the rise and capacity to produce the product grows every month. Plants on coming online at a rapid pace and more are planned. But the State needs to more much more aggressive in facilitating this expansion. I strongly recommend ARB to revise the implementation timeline for the diesel fuel pool to include more aggressive decreases in carbon beginning in 2010.

Thank you for your time.

Kelly Olsen  
310-453-4784

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-18 08:43:33

No Duplicates.



**Comment 125 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Eric  
Last Name: Bowen  
Email Address: celiadubose@gmail.com  
Affiliation:

Subject: Comment re: Low Carbon Fuel Standard (LCFS) Regulation  
Comment:

Dear Ms. Singh,

Attached please find a letter from the California Biodiesel Alliance detailing our support for an acceleration of the implementation schedule for California's Low Carbon Fuel Standard. Thank you very much for listening to the concerns of the biodiesel community in this matter.

Best,  
Celia DuBose for  
Eric Bowen, Chairman  
California Biodiesel Alliance  
[www.californiabiodieselalliance.org](http://www.californiabiodieselalliance.org)

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/130-cba\\_lcfs\\_letter\\_2.11.09.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/130-cba_lcfs_letter_2.11.09.pdf)

Original File Name: CBA LCFS Letter 2.11.09.pdf

Date and Time Comment Was Submitted: 2009-02-18 08:46:18

No Duplicates.

## **Comment 126 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Erik  
Last Name: Zimmerman  
Email Address: lorraine@vertbiodiesel.com  
Affiliation: Vert Biodiesel

Subject: RE: Low Carbon Fuel Standard (LCFS) Regulation – January workshop  
Comment:

Dear Ms. Singh:

Vert Biodiesel, located in Los Angeles has been educating, marketing and distributing all blends of biodiesel in Los Angeles, Ventura and Orange Counties for 6 months. In this short period of time our customer list has grown to include biodiesel cooperatives, medium sized commercial fleets, individual consumers, waste management services, generator and transportation companies.

I write today to comment on the draft LCFS regulation as discussed at the January 30, 2009 workshop and to encourage an accelerated timeline for Biodiesel and other diesel alternatives.

I appreciate the change made in the implementation timeline from the December workshop to begin implementation in 2011 but request more be done. According to the California Energy Commission, California is using 43+million gallons of Biodiesel per year. California has nine Biodiesel plants operating, with an estimated total production capacity of 63 million gallons per year; another 4 plants are idle and at least one is under construction. The existing infrastructure is more than capable of meeting the demands of a one percent reduction in carbon intensity beginning January 2010. Furthermore, according to the California Energy Commission, the current AB 118 investment plan will allocate funding towards the development of biodiesel blending and distribution infrastructure. I strongly recommend ARB revise the implementation timeline for the diesel fuel pool to include more aggressive decreases in carbon beginning in 2010.

Thank you for your consideration of these comments. Should you have any questions or need additional information please call me at 323-587-8748.

Sincerely,

Erik Zimmerman

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-18 09:49:24

No Duplicates.

**Comment 127 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Kevin

Last Name: Kuper

Email Address: kevin@whole-energy.com

Affiliation: Whole Energy Fuels

Subject: Low Carbon Fuel Standard request

Comment:

Please refer to attachment.

Gratitude,

Kevin

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/132-lcfs\\_request\\_-\\_cba.docx](http://www.arb.ca.gov/lists/lcfs-policy-ws/132-lcfs_request_-_cba.docx)

Original File Name: LCFS request - CBA.docx

Date and Time Comment Was Submitted: 2009-02-18 09:51:23

No Duplicates.

**Comment 128 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Paul  
Last Name: Oppenheimer  
Email Address: ncsupaul@gmail.com  
Affiliation: PIA

Subject: Re: LCFS Recommendations  
Comment:

Manisha,

Here is a copy of our letter. I also attached a fact sheet on who we are for those who don't know. The fact sheet isn't necessary to post on the LCFS website. Thanks for your help.

-Paul Oppenheimer

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/133-pia\\_comments.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/133-pia_comments.zip)

Original File Name: PIA Comments.zip

Date and Time Comment Was Submitted: 2009-02-18 09:53:58

No Duplicates.

**Comment 129 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Chuck  
Last Name: White  
Email Address: CBeamon@wm.com  
Affiliation: Waste Management

Subject: Comments on draft LCFS Regulation  
Comment:

The attached letter is sent on behalf of Chuck White.

<<Comments on Draft LCFS Regulation.pdf>>

Carol Beamon  
Waste Management  
Administrative Assistant  
Government Affairs  
915 L St., Suite 1430  
Sacramento, CA 95814  
916/552-5859  
916/448-2470

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/134-comments\\_on\\_draft\\_lcfs\\_regulation.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/134-comments_on_draft_lcfs_regulation.pdf)

Original File Name: Comments on Draft LCFS Regulation.pdf

Date and Time Comment Was Submitted: 2009-02-18 09:55:49

No Duplicates.

**Comment 130 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Dan  
Last Name: Tenenblatt  
Email Address: dan@wrightbiofuels.com  
Affiliation: Wright Biofuels

Subject: Comment re: Draft LCFS Regulation  
Comment:

Ms. Singh-

Attached please find a comment regarding the draft LCFS regulation. As I state in the letter, we have the capacity to reduce carbon emissions in the diesel fuel pool at a significantly more accelerated rate than the current ARB proposal. Biodiesel producers in California will have no problem producing enough fuel to reduce carbon emissions by one percent in 2010. Accelerating the implementation schedule will lead to more investment in the California biodiesel industry, creation of in-state jobs, tax revenue for the state, and a cleaner environment. I strongly urge the ARB to enact a more aggressive implementation schedule than the current proposal.

Thank you for your time,

Dan Tenenblatt

---

Dan Tenenblatt  
Wright Biofuels  
511 N. Dillon Ave.  
San Jacinto, CA 92582  
Ph: (951) 654-4099  
Fax: (951) 654-3575  
dan@wrightbiofuels.com

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/135-comment\\_re\\_draft\\_lcfs\\_regulation.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/135-comment_re_draft_lcfs_regulation.doc)

Original File Name: Comment re Draft LCFS Regulation.doc

Date and Time Comment Was Submitted: 2009-02-18 10:32:03

No Duplicates.

## **Comment 131 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Eric  
Last Name: Bowen  
Email Address: celiadubose@gmail.com  
Affiliation: Tellurian Biodiesel

Subject: Comment re: Low Carbon Fuel Standard (LCFS) Regulation  
Comment:

Ms. Singh,

I've attached a letter from Eric Bowen of Tellurian Biodiesel, Inc. urging support for an acceleration of the implementation schedule for California's Low Carbon Fuel Standard. As the letter states, Tellurian is a leader in California's Biodiesel industry, which produces the majority of its fuel from recycled sources and offers a model of environmental sustainability that can be a key component in decreasing California's dependence on foreign oil, meeting the requirements of AB32, and creating much needed green jobs. Thank you for your work and for your consideration of this request.

Best,  
Celia DuBose for  
Eric Bowen, President and CEO  
Tellurian Biodiesel

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/136-tb\\_let\\_re\\_lcfs\\_2.12.09.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/136-tb_let_re_lcfs_2.12.09.pdf)

Original File Name: TB Let re LCFS 2.12.09.pdf

Date and Time Comment Was Submitted: 2009-02-18 11:10:06

No Duplicates.



**Comment 132 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Eric  
Last Name: Smith  
Email Address: esmith@greendepot.org  
Affiliation: Green Depot

Subject: Comment regarding the draft LCFS regulation  
Comment:

Dear Ms. Singh,

I've attached a comment regarding the draft LCFS regulation. As I state in the letter, the existing infrastructure can do even more than just meet the demands of a 1% reduction in carbon intensity beginning January 2010. An accelerated timeline for biodiesel will nourish one of the greenest industries our state has to offer. Thank you so much for your consideration of this important issue.

Sincerely,

Eric Smith  
Director, Green Depot  
1255 Post Street Suite 1015  
San Francisco, CA 94110  
415-308-2276

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/137-gd\\_lcfs209.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/137-gd_lcfs209.pdf)

Original File Name: GD\_LCFS209.pdf

Date and Time Comment Was Submitted: 2009-02-18 11:11:55

No Duplicates.

**Comment 133 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Shelby

Last Name: Neal

Email Address: SNeal@biodiesel.org

Affiliation: National Biodiesel Board

Subject: LCFS Comments from National Biodiesel Board

Comment:

Michelle,

Please find attached NBB's formal comments regarding the most recent amendments to the ARB's LCFS. I hope you find them to be useful as you begin to finalize the policy.

Best regards,

Shelby

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/138-national\\_biodiesel\\_board.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/138-national_biodiesel_board.zip)

Original File Name: National Biodiesel Board.zip

Date and Time Comment Was Submitted: 2009-02-18 13:37:38

No Duplicates.

**Comment 134 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

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

**Comment 135 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Curtis  
Last Name: Wright  
Email Address: [wright@imperialwesternproducts.com](mailto:wright@imperialwesternproducts.com)  
Affiliation: Imperial Western Products

Subject: LCFS Implementation Schedule  
Comment:

Dear Ms. Singh,

Please see attached letter regarding the implementation schedule for LCFS.

Best regards,

Curtis Wright  
Division Manager  
Imperial Western Products  
[www.biotanefuels.com](http://www.biotanefuels.com)

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/140-lcfs\\_2\\_13\\_09.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/140-lcfs_2_13_09.doc)

Original File Name: LCFS 2 13 09.doc

Date and Time Comment Was Submitted: 2009-02-18 13:42:52

No Duplicates.

**Comment 136 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Trevitt

Last Name: Shultz

Email Address: wesley.peoplesfuel@gmail.com

Affiliation: People's Fuel

Subject: Comment regarding the draft LCFS regulation

Comment:

Dear Ms. Singh,

Please consider the attached comment regarding the draft LCFS regulation. As I state in the letter, the existing infrastructure can do even more than just meet the demands of a 1% reduction in carbon intensity beginning January 2010. And if we accelerate the timeline for biodiesel will can encourage one of the greenest industries in California. Thank you for taking the time to consider this important request.

Sincerely,  
Trevitt

Vice President

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/141-pfc\\_lcfs\\_let\\_2.13.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/141-pfc_lcfs_let_2.13.doc)

Original File Name: PFC LCFS let 2.13.doc

Date and Time Comment Was Submitted: 2009-02-18 13:49:25

No Duplicates.

**Comment 137 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Tom

Last Name: Jacob

Email Address: Tom.Jacob@USA.dupont.com

Affiliation: DUPONT

Subject: DUPONT LCFS COMMENTS

Comment:

Attached please find DuPont comments on the LCFS and the current Corn Ethanol fuel pathway. Please feel free to contact me if you have any questions... Tom Jacob

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/142-dupont\\_lcfs\\_comments\\_2-13-09.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/142-dupont_lcfs_comments_2-13-09.pdf)

Original File Name: DuPont LCFS Comments 2-13-09.pdf

Date and Time Comment Was Submitted: 2009-02-18 13:52:29

No Duplicates.

**Comment 138 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

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

Subject: CLNE Comments on CARB's January LCFS Draft  
Comment:

Dear Ms. Singh,

Please accept Clean Energy's comments on the January version of CARB's LCFS Draft Reg. Thank you for this opportunity. We look forward to continuing our work with you and CARB staff to support this important regulation. Have a great President's Day weekend!

Best regards,

Todd

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/143-clne\\_final\\_comments\\_on\\_lcfs\\_2.13.09.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/143-clne_final_comments_on_lcfs_2.13.09.pdf)

Original File Name: CLNE Final Comments on LCFS 2.13.09.pdf

Date and Time Comment Was Submitted: 2009-02-18 13:54:38

No Duplicates.

**Comment 139 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Brooke

Last Name: Coleman

Email Address: bcoleman@newfuelsalliance.org

Affiliation: New Fuels Alliance

Subject: 1/30 Workshop Comments

Comment:

Please accept the attached comments for the record, regarding the 1-30-09 Workshop.

Thanks,

Brooke

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/144-arb\\_comments\\_2.12.09.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/144-arb_comments_2.12.09.pdf)

Original File Name: ARB Comments\_2.12.09.pdf

Date and Time Comment Was Submitted: 2009-02-18 13:59:49

No Duplicates.



## **Comment 140 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Daniel  
Last Name: Sinks  
Email Address: H.daniel.sinks@conocophillips.com  
Affiliation: Conoco Phillips

Subject: ConocoPhillips Comments- 1/30/09 CaLCFS Draft  
Comment:

Manisha,

Thank you for the opportunity to comment on the recent draft of the California Low Carbon Fuel Standard regulations and the materials provided at the January 30th workshop. Attached are our written comments.

Please contact me if you have any questions regarding the attached document.

Also, at the 1/30 meeting, there was mention of a February workshop regarding CARB's LCFS Economic Analysis. Is there any word on the date, time, location for this meeting?

Regards,  
Daniel Sinks  
ConocoPhillips  
562-290-1521  
H.daniel.sinks@conocophillips.com

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/145-cop\\_lcfs\\_comments\\_on\\_lcfs\\_\\_2\\_13\\_09\\_.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/145-cop_lcfs_comments_on_lcfs__2_13_09_.pdf)

Original File Name: COP LCFS comments on LCFS \_2\_13\_09\_.pdf

Date and Time Comment Was Submitted: 2009-02-18 14:04:08

No Duplicates.

**Comment 141 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: David  
Last Name: Modisette  
Email Address: Dave@ppallc.com  
Affiliation: California Electric Transportation Coali

Subject: CalETC Comments on the January, 2009 Revisions to the LCFS Regs  
Comment:

Attached are comments of the California Electric Transportation Coalition (CalETC) on the January, 2009 Revisions of the Draft

Low-Carbon Fuel Standard Regulation.  
Please do not hesitate to contact me if I can provide any additional information.

David Modisette  
Executive Director,  
California Electric Transportation Coalition  
1015 K Street, Suite 200  
Sacramento, CA 95814

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/146-caletc\\_letterhead-caletc\\_feb\\_13\\_draft\\_final\\_letter\\_to\\_carb\\_1.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/146-caletc_letterhead-caletc_feb_13_draft_final_letter_to_carb_1.pdf)

Original File Name: CalETC Letterhead-CalETC Feb 13 Draft Final Letter to CARB 1.pdf

Date and Time Comment Was Submitted: 2009-02-18 14:06:07

No Duplicates.

**Comment 142 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Jeff  
Last Name: Stephens  
Email Address: jeffs@propelfuels.com  
Affiliation: Propel Biofuels

Subject: LCFS draft comments  
Comment:

Ms.Singh, Attached please find a response to the January draft of the LCFS regulations. Please contact me if you have any questions regarding my comments. Thank you.

Sincerely,  
Jeff Stephens  
Senior Scientist  
Propel Biofuels

206-948-8430

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/147-arb\\_lcfs\\_response\\_propel\\_021309.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/147-arb_lcfs_response_propel_021309.doc)

Original File Name: ARB LCFS response Propel 021309.doc

Date and Time Comment Was Submitted: 2009-02-18 14:08:03

No Duplicates.

**Comment 143 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: PETE

Last Name: PRICE

Email Address: pete@pricecon.com

Affiliation: CNGVC

Subject: CNVGVC--comments on draft LCFS regs

Comment:

Manisha:

Please acknowledge receipt of the attached comments from the California Natural Gas Vehicle Coalition. Thank you.

Pete

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/148-lcfs--cngvc\\_comments\\_final\\_2-13-09.doc](http://www.arb.ca.gov/lists/lcfs-policy-ws/148-lcfs--cngvc_comments_final_2-13-09.doc)

Original File Name: lcfs--cngvc comments final 2-13-09.doc

Date and Time Comment Was Submitted: 2009-02-18 14:09:57

No Duplicates.

**Comment 144 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Gina D.

Last Name: Grey

Email Address: gina@wspa.org

Affiliation: WSPA

Subject: WSPA Comments on LCFS Regulation

Comment:

Manisha: Please find attached WSPA's comments as requested by February 13. We will be distributing the comments to the c.c. list on Tuesday.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/149-wspacommentsarblcfs021309final.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/149-wspacommentsarblcfs021309final.pdf)

Original File Name: WSPAcommentsARBLCFS021309final.pdf

Date and Time Comment Was Submitted: 2009-02-18 14:11:32

No Duplicates.

**Comment 145 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Cory  
Last Name: Wendt  
Email Address: cwendt@bestenergies.com  
Affiliation: BEST ENERGIES, INC.

Subject: California LCFS comment period  
Comment:

Anil and John,

As we have monitored the LCFS work done to date, and as a follow up to the January 29th workshop we are formally submitting a questions for your February 13 comment review deadline. We are producing a fuel which could be sold in to California later this year and we want to understand how we will need to account for selling fuel as part of the LCFS being proposed.

Please find the documents attached for our questions.

If you should have any additional questions, please be in contact with us directly.

Best regards,

Cory Wendt

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/150-best\\_energies\\_comments.zip](http://www.arb.ca.gov/lists/lcfs-policy-ws/150-best_energies_comments.zip)

Original File Name: Best Energies Comments.zip

Date and Time Comment Was Submitted: 2009-02-18 14:13:50

No Duplicates.

**Comment 146 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: C. Ross  
Last Name: Hamilton  
Email Address: rhamilton@darlingii.com  
Affiliation: Darling International

Subject: Darling International comments on Draft Low Carbon Fuel Standard Regulation  
Comment:

To: Manisha Singh

Attached are comments Darling International Inc. is submitting on the Draft Low Carbon Fuel Standard Regulation as discussed at the January 30, 2009 workshop.

If you have questions or encounter problems opening this document, please contact me.

Thank you,

C. Ross Hamilton, Ph. D.

Director Government Affairs & Technology

rhamilton@darlingii.com

Darling International Inc.

251 O'Connor Ridge Blvd., Suite 300

Irving, TX 75038

Phone - (972) 281-4461

Cell - (469) 387-2881

Fax - (972) 717-0763

Web site <http://www.darlingii.com>

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/151-arb\\_lcfs\\_comments\\_from\\_darling\\_international.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/151-arb_lcfs_comments_from_darling_international.pdf)

Original File Name: ARB LCFS comments from Darling International.pdf

Date and Time Comment Was Submitted: 2009-02-18 14:16:57

No Duplicates.



**Comment 147 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Harry  
Last Name: Simpson  
Email Address: HSimpson@crimsonrm.com  
Affiliation: Crimson Renewable Energy LP

Subject: comments on LCFS workshop held Jan 30th  
Comment:

Pls see attached Letter.

Harry Simpson  
Crimson Resource Management Corp.  
President, Crimson Renewable Energy LP  
tel: (303) 327-7675  
fax: (303) 825-1035  
email: hsimpson@crimsonrm.com  
www.crimsonrenewable.com

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/152-lcfs\\_\\_letter\\_to\\_arb\\_2-13-08.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/152-lcfs__letter_to_arb_2-13-08.pdf)

Original File Name: LCFS letter to ARB 2-13-08.pdf

Date and Time Comment Was Submitted: 2009-02-19 10:07:33

No Duplicates.

**Comment 148 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Tom

Last Name: Koehler

Email Address: tomk@pacificethanol.net

Affiliation: Pacific Ethanol

Subject: Presenter Request for Next Workshop

Comment:

Bob and Dean, I offer this power point presentation I found off the web as Pacific Ethanol's comments regarding the LCFS. I respectfully request that the authors of this presentation present at our next workshop. The issues they raise are profound and consequential to the regulation. Please let me know thanks !!

Tom

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/153-luc\\_issues\\_in\\_econ\\_models\\_ornl\\_kline\\_oladosu\\_26jan09v2.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/153-luc_issues_in_econ_models_ornl_kline_oladosu_26jan09v2.pdf)

Original File Name: LUC Issues in Econ Models\_ORNL Kline Oladosu 26Jan09v2.pdf

Date and Time Comment Was Submitted: 2009-02-19 10:13:08

No Duplicates.

**Comment 149 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Tim

Last Name: Hogan

Email Address: [thogan@npra.org](mailto:thogan@npra.org)

Affiliation:

Subject: Comments from Jan 30 LCFS workshop

Comment:

Attached are comments from the National Petrochemical and Refiners Association.

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/154-npra\\_lcfs\\_2-25\\_letter\\_to\\_carb.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/154-npra_lcfs_2-25_letter_to_carb.pdf)

Original File Name: NPRA LCFS 2-25 Letter to CARB.pdf

Date and Time Comment Was Submitted: 2009-02-25 13:48:54

No Duplicates.

**Comment 150 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Christopher J.

Last Name: Holly

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

Affiliation: Alberta Energy

Subject: LCFS comments

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/155-albertaenergycomments.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/155-albertaenergycomments.pdf)

Original File Name: AlbertaEnergycomments.pdf

Date and Time Comment Was Submitted: 2009-02-26 11:40:32

No Duplicates.

**Comment 151 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Bridget

Last Name: Bartels

Email Address: [bbartels@lacsds.org](mailto:bbartels@lacsds.org)

Affiliation: Los Angeles County Sanitation Districts

Subject: Consideration for Waste-Derived Alternative Fuels in the Proposed Low Carbon Fuel Standard

Comment:

Attached is a LACSD comment letter on "Consideration for Waste-Derived Alternative Fuels in the Proposed Low Carbon Fuel Standard (LCFS)".

Thank you,

Bridget Bartels

Secretary II

Air Quality Engineering

Los Angeles County Sanitation Districts

(562) 908-4288 xt. 2158

Fax (562) 692-9690

[bbartels@lacsds.org](mailto:bbartels@lacsds.org)

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/156-dms.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/156-dms.pdf)

Original File Name: DMS.PDF

Date and Time Comment Was Submitted: 2009-02-26 11:42:43

No Duplicates.

**Comment 152 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Blake A.

Last Name: Simmons

Email Address: basimmo@sandia.gov

Affiliation:

Subject: Indirect land use letter to Gov. Schwarzenegger

Comment:

Good morning Chairwoman Nichols-

Hope you are doing well. For your reference, I have attached a letter that we, 110 scientists representing a wide spectrum of biofuel activities worldwide, will submit to Governor Schwarzenegger in the near future that addresses concerns we have around the imminent policy rulings by the ARB on the selective inclusion of indirect land use impacts for biofuels.

Best regards,

Blake

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/157-phd\\_lcfs\\_final\\_feb\\_2009.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/157-phd_lcfs_final_feb_2009.pdf)

Original File Name: PhD\_LCFS\_Final Feb 2009.pdf

Date and Time Comment Was Submitted: 2009-02-26 11:44:42

No Duplicates.

## **Comment 153 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 7th Workshop.**

First Name: Kevin  
Last Name: Stringer  
Email Address: pstokoe@NRCan.gc.ca  
Affiliation: Natural Resources Canada

Subject: California's proposed Low Carbon Fuel Standard  
Comment:

Dear Messrs. Courtis and Simeroth,

Please find attached a letter to you from Mr. Kevin Stringer, Director General, Petroleum Resources Branch, Natural Resources Canada, Government of Canada, cc to Messrs. James Goldstene and Michael Scheible.

<<0462\_001.pdf>>  
Original to follow by regular mail.

Sincerely,

Peter K. Stokoe

Peter Stokoe, pstokoe@NRCan.gc.ca, 613-996-8926, facsimile /  
télécopieur 613-995-5576  
Acting Chief, Bilateral Relations / Chef intérimaire, Relations  
bilatérales  
International Energy Division / Division internationale (énergie)

Petroleum Resources Branch / Direction des ressources pétrolières

Energy Sector / Secteur de l' énergie  
Natural Resources Canada, 580 Booth Street, 19B5-2, Ottawa,  
Ontario K1A 0E4  
Ressources naturelles Canada, 580 rue Booth, 19B5-2, Ottawa  
(Ontario) K1A 0E4  
Government of Canada / Gouvernement du Canada

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/158-0462\\_001.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/158-0462_001.pdf)

Original File Name: 0462\_001.pdf

Date and Time Comment Was Submitted: 2009-03-04 13:44:57

No Duplicates.

**Comment 154 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

First Name: Bob

Last Name: Graham

Email Address: Bob.Graham@sce.com

Affiliation: Southern California Edison

Subject: Comments of Southern California Edison Company to the California Air Resources  
Comment:

See Attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/159-sce\\_comments\\_to\\_carb\\_on\\_august\\_5\\_lcfs\\_workshop\\_final.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/159-sce_comments_to_carb_on_august_5_lcfs_workshop_final.pdf)

Original File Name: SCE Comments to CARB on August 5 LCFS workshop final.pdf

Date and Time Comment Was Submitted: 2009-08-31 14:27:32

No Duplicates.



**Comment 155 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

First Name: Norman

Last Name: Pederson

Email Address: npedersen@HANMOR.COM

Affiliation: Southern Ca. Public Power Authority

Subject: SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY COMMENT ON ON-ROAD ELECTRIC VEHICLE ISSUES

Comment:

See Attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/160-scppa.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/160-scppa.pdf)

Original File Name: SCPPA.pdf

Date and Time Comment Was Submitted: 2009-08-31 14:31:52

No Duplicates.

**Comment 156 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

First Name: Geoff

Last Name: Cooper

Email Address: GCooper@ethanolrfa.org

Affiliation: Renewable Fuels Association

Subject: Comments on Proposal for an Expert Workgroup

Comment:

See Attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/161-work\\_group\\_comments\\_rfa.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/161-work_group_comments_rfa.pdf)

Original File Name: Work Group Comments\_RFA.pdf

Date and Time Comment Was Submitted: 2009-09-01 10:04:55

No Duplicates.

**Comment 157 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

First Name: Lindsay

Last Name: Mitchell

Email Address: lmitchell@ilcorn.org

Affiliation: Illinois Corn Growers Association

Subject: Request for Comments on Establishing New Fuel Pathways and Proposal for an Expert Workgroup

Comment:

See Attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/162-carb\\_final\\_letter\\_8\\_28\\_09.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/162-carb_final_letter_8_28_09.pdf)

Original File Name: CARB Final Letter 8 28 09.pdf

Date and Time Comment Was Submitted: 2009-09-01 10:21:26

No Duplicates.

**Comment 158 for Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) - 1st Workshop.**

First Name: Clayton

Last Name: McMartin

Email Address: cem@cfch.com

Affiliation: Clean Fuels Clearinghouse

Subject: Comments to Support Commercially Viable Implementation of the Low  
Comment:

See Attachment

Attachment: [www.arb.ca.gov/lists/lcfs-policy-ws/163-cfch\\_comments\\_on\\_lcfs.pdf](http://www.arb.ca.gov/lists/lcfs-policy-ws/163-cfch_comments_on_lcfs.pdf)

Original File Name: CFCH Comments on LCFS.pdf

Date and Time Comment Was Submitted: 2009-09-03 10:33:06

No Duplicates.

**There are no comments posted to Low Carbon Fuel Standard - Policy and Regulatory Development (lcfs-policy-ws) that were presented during the Workshop at this time.**