

## **Comment 1 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

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

## **Comment 2 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

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

### **Comment 3 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

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

## **Comment 4 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: David

Last Name: Kleiman

Email Address: kleimandavid@hotmail.com

Affiliation:

Subject: Lack of public CNG stations

Comment:

I have been considering switching to a car fueled by Compressed Natural Gas for some time but I live in West Hollywood and there are no public refueling stations for miles. It would be necessary to go all the way to Burbank or Westwood to find a station. I think some consumers are willing to pay more and forfeit luxury for greener alternatives but that is just too much. It is a shame that there are more viable alternatives.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-05-14 14:20:19

No Duplicates.

## **Comment 5 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Steve

Last Name: Shaffer

Email Address: sshaffer@cdfa.ca.gov

Affiliation: CA Department of Food and Agriculture

Subject: Comments for the LCFS

Comment:

Attached is a letter that Secretary Kawamura sent to Chairwoman Nichols.

Attachment: [www.arb.ca.gov/lists/lcfs-general-ws/9-carb\\_letter\\_from\\_cdfa.pdf](http://www.arb.ca.gov/lists/lcfs-general-ws/9-carb_letter_from_cdfa.pdf)

Original File Name: CARB Letter from CDFA.pdf

Date and Time Comment Was Submitted: 2008-06-16 15:02:39

No Duplicates.

## **Comment 6 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Roberto

Last Name: Amadei

Email Address: ramadei1@alice.it

Affiliation: Chemical & Energy Development srl

Subject: A lifecycle low carbon fuel

Comment:

See the attached report, "An economic and environmental gasoline",  
in its turn containing two enclosures.

Thank you for soliciting public comments.

Attachment: [www.arb.ca.gov/lists/lcfs-general-ws/10-lcfs.rar](http://www.arb.ca.gov/lists/lcfs-general-ws/10-lcfs.rar)

Original File Name: LCFS.rar

Date and Time Comment Was Submitted: 2008-06-19 09:03:07

No Duplicates.

## **Comment 7 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Tom

Last Name: Frantz

Email Address: ini@lightspeed.net

Affiliation: Association of Irrigated Residents

Subject: Low Carbon Fuel Standard Comments

Comment:

Please accept the attached comments concerning the Low Carbon Fuel Standard and its economic implications for California, the USA, and the rest of the world.

Attachment: [www.arb.ca.gov/lists/lcfs-general-ws/11-tom\\_frantz\\_lcfs\\_june\\_24\\_2008.doc](http://www.arb.ca.gov/lists/lcfs-general-ws/11-tom_frantz_lcfs_june_24_2008.doc)

Original File Name: Tom Frantz LCFS June 24 2008.doc

Date and Time Comment Was Submitted: 2008-06-24 15:03:51

No Duplicates.

## **Comment 8 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Howard

Last Name: Sloane

Email Address: hsloane@roadrunner.com

Affiliation:

Subject: Reducing emissions and fuel use through traffic control

Comment:

My 2001 VW wagon gets 17 mpg when I am driving around San Diego. When we go to Utah and Wyoming it gets 10 mpg MORE! In San Diego its average speed is 24 mph.

Why? In my local area, I spend more time waiting for traffic signals and stopping at stop signs where these are not appropriate than moving forward. It appears that there is little effort to coordinate signals, I sometimes stop 3-5 times in a 5 block area. Signals are not "intelligent," that is, I stop at a red light when there is no traffic coming in the other direction, or for quite some time after the last traffic has passed coming in the other direction. One route I frequently travel as 12 stop sighs in 1 mile (my guess as to distance), some where the cross street is a short dead end!

Some traffic engineer could assess the impact of this and the savings in emissions and fuel by upgrading all signals and stop signs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-25 07:56:47

No Duplicates.



## **Comment 9 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: dana l

Last Name: turner

Email Address: reinventex101@aol.com

Affiliation: DLT LABORATORIES

Subject: Scientific studies

Comment:

Do the scientific studies used as a basis/rational of legislative action/regulation meet the standards of the National Academy of Sciences and if not, why are they accepted?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 12:08:20

No Duplicates.

## **Comment 10 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Steve

Last Name: Falck

Email Address: Steve.Falck@regfuel.com

Affiliation:

Subject: LCFS

Comment:

Letter from Midwestern Legislative Conference, Agriculture  
Committee Co-Chairs; Rep. Al Juhnke, MN & Rep. Rich Myers, IL

Attachment: [www.arb.ca.gov/lists/lcfs-general-ws/14-low\\_carbon\\_fuel\\_standard\\_letter.pdf](http://www.arb.ca.gov/lists/lcfs-general-ws/14-low_carbon_fuel_standard_letter.pdf)

Original File Name: low carbon fuel standard letter.pdf

Date and Time Comment Was Submitted: 2008-08-07 11:03:36

No Duplicates.

## **Comment 11 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Steve

Last Name: Falck

Email Address: Steve.Falck@regfuel.com

Affiliation:

Subject: LCFS

Comment:

Resolution on LCFS by the Midwestern Legislative Conference of the  
Council of State Governments. Adopted July 16, 2008.

Attachment: [www.arb.ca.gov/lists/lcfs-general-ws/15-4-low\\_carbon\\_fuel\\_standard.pdf](http://www.arb.ca.gov/lists/lcfs-general-ws/15-4-low_carbon_fuel_standard.pdf)

Original File Name: #4 - Low Carbon Fuel Standard.pdf

Date and Time Comment Was Submitted: 2008-08-07 11:06:22

No Duplicates.

## **Comment 12 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Joe

Last Name: Sparano

Email Address: joe@wspa.org

Affiliation: Western States Petroleum Association

Subject: Letter from WSPA to Governor regarding the LCFS Program

Comment:

See Attachment

Attachment: [www.arb.ca.gov/lists/lcfs-general-ws/17-082008wspa.pdf](http://www.arb.ca.gov/lists/lcfs-general-ws/17-082008wspa.pdf)

Original File Name: 082008WSPA.pdf

Date and Time Comment Was Submitted: 2008-09-04 09:39:30

No Duplicates.

## **Comment 13 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st 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-general-ws/18-090308wspa.pdf](http://www.arb.ca.gov/lists/lcfs-general-ws/18-090308wspa.pdf)

Original File Name: 090308WSPA.pdf

Date and Time Comment Was Submitted: 2008-09-04 09:41:54

No Duplicates.

## **Comment 14 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: JOSEPH

Last Name: KUZMANIC

Email Address: jkuzmanic@yahoo.com

Affiliation: AIRPORT QUICK LUBE INC.

Subject: CARBON EMISSIONS FROM GASOLINE USE

Comment:

WE HAVE BEEN INSTALLING HYDROGEN FUEL SYSTEMS ON AUTOMOBILES THAT HAVE LOW MILEAGE PER GALLON USED. THE AVERAGE INCREASE IN MILAGE IS MINIMUM OF 25% AND UP TO 60%. THE AMAZING THING ABOUT THE SYSTEM IS THAT THERE IS VERY LITTLE CARBON EMISSION IN THE EXHAUST SYSTEM. USING WATER FOR THE CONVERSION CREATES WATER THAT IS EMMITED IN THE PLACE OF NORMAL GASOLINE EXHAUST. BEFORE I DECIDED TO SELL THE UNITS TO THE PUBLIC, I TESTED THREE COMPANY CARS, A NAVIGATOR 2005, A FORD F150 2004, AND A RANGE ROVER 2004. THE AVERAGE MILAGE INCREASE WAS 35 OR 40 PERCENT ON THESE VEHICLES. THE UNIT PAYS FOR ITSELF IN A VERY SHORT PERIOD OF TIME. YOU CAN VISIT OUR WEBSITE AT [www.fuelfromh2o-riverside.com](http://www.fuelfromh2o-riverside.com). YOU MUST SEE THIS TO BELIEVE IT AS THIS CERTAINLY WILL SAVE MORE GASOLINE AND ELIMINATE MORE EMISSIONS THAN ANY TIRE PRESSURE MONITOR PROGRAM. WE WOULD BE GLAD TO SHOW OUR SYSTEMS AND THE INSTALLATION TO ANYONE FROM THE AIR RESOURCES BOARD.

SINCERELY YOURS,

JOSEPH J. KUZMANIC  
PRESIDENT  
AIRPORT QUICK LUBE INC.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-15 12:07:31

No Duplicates.

## **Comment 15 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Patricia

Last Name: Monahan

Email Address: pmonahan@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Carbon accounting using scientific principles

Comment:

Attached are UCS's comments on the October LCFS draft regulation, specifically on the question of how to appropriately account for carbon emissions over time. We recommend that CARB consider utilizing scientific rather than economic principles to account for carbon. Bottom line: accounting for the fact that carbon continues to reside in the atmosphere and has a radiative forcing effect for decades worsens the case for corn ethanol and for any biofuel with indirect land use effects.

Attachment: [www.arb.ca.gov/lists/lcfs-general-ws/21-ucs\\_comments\\_nov\\_2008.pdf](http://www.arb.ca.gov/lists/lcfs-general-ws/21-ucs_comments_nov_2008.pdf)

Original File Name: UCS comments\_Nov 2008.pdf

Date and Time Comment Was Submitted: 2008-11-14 17:18:05

No Duplicates.

## **Comment 16 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Derold

Last Name: Davis

Email Address: ddavissci@yahoo.com

Affiliation:

Subject: Greenhouse Gas Regulations

Comment:

First Off, If the planet is warming, then prove it by coming to Minnesota after Christmas for a week and only wear T-Shirts and shorts.

Second, If you jerks have been doing so well for all the years you claim, then WHY IS CA IN SUCH A BUDGET CRISIS? All ytour grand savings over the years should have prevented the budget problems. Or maybe you haven't heard yet, Carmakers are in a severe financial crisis. My guess is that you just don't give a shit!!!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-12-11 16:36:15

No Duplicates.



## **Comment 17 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Tim

Last Name: Hogan

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

Affiliation:

Subject: NPRA comments for the Dec 2 LCFS workshop

Comment:

Attached are comments from the National Petrochemical and Refiners Association.

Attachment: [www.arb.ca.gov/lists/lcfs-general-ws/23-carb\\_lcfs\\_comments\\_dec2008.pdf](http://www.arb.ca.gov/lists/lcfs-general-ws/23-carb_lcfs_comments_dec2008.pdf)

Original File Name: CARB LCFS comments Dec2008.pdf

Date and Time Comment Was Submitted: 2008-12-16 07:00:37

No Duplicates.

## **Comment 18 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Anna

Last Name: Lee

Email Address: alee@cbeval.org

Affiliation:

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

Comment:

This is an excerpt from a comment submitted by Communities for a Better Environment for the AB32 scoping plan. This part of the comment relates to LCFS and so is posted here in addition to AB32 Scoping Plan comments page.

The extrapolation follows:

5. A cornerstone of Transportation emissions controls in the Plan -- the Low Carbon Fuel Standard (LCFS) -- will increase greenhouse gases, and will severely increase smog, water pollution, worldwide food shortages, increased food prices, and damage to wildlife. This increase is due to the LCFS's dependence on corn ethanol (now acknowledged in the LCFS to cause increased greenhouse gases), and the failure to prevent switches to heavy crude oil at oil refineries. The switch to heavy crude oil is happening now but will drastically increase unless the Scoping Plan addresses it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-01-02 12:57:55

No Duplicates.

## **Comment 19 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Luke

Last Name: Cole

Email Address: luke@igc.org

Affiliation:

Subject: AB 32 Scoping Plan Comments

Comment:

This comment was originally submitted on the AB32 scoping plan comments site (Comment # 454). A duplicate copy is posted here.

See attached.

Attachment: [www.arb.ca.gov/lists/lcfs-general-ws/25-1657-scoping\\_plan\\_comments\\_-\\_crpe\\_final\\_12-10-08.pdf](http://www.arb.ca.gov/lists/lcfs-general-ws/25-1657-scoping_plan_comments_-_crpe_final_12-10-08.pdf)

Original File Name: 1657-scoping\_plan\_comments\_-\_crpe\_final\_12-10-08.pdf

Date and Time Comment Was Submitted: 2009-01-05 15:14:29

No Duplicates.

## **Comment 20 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Mark

Last Name: Albers

Email Address: Mark.J.Albers@gmail.com

Affiliation:

Subject: Avoid Fuel Biases

Comment:

I am writing to comment on the Low Carbon Fuel Standard (LCFS) program. The State of California's LCFS will be a model for the rest of the United States, so it is especially important that the LCFS accurately and fairly assess all of the emissions associated with each fuel and its use.

Each of the following elements is essential to ensure that the LCFS is not biased toward or against a particular fuel, and to make sure that you consider all of the associated emissions. I request that these be included in the final drafting of the Standard:

1 Upstream emissions: Emissions from the production of fuels are a critical component of evaluating carbon emission standards to ensure a comprehensive "well to wheels" assessment.

2 Drive train efficiency: Calculation of the carbon metric must include the drive train efficiency for each fuel type to fully estimate carbon emissions.

I support the concept of a LCFS. However, I urge you to provide an impartial analysis of, and impartial standards for, energy and fuel alternatives by incorporating the elements described above.

Sincerely,  
Mark J. Albers

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-13 18:54:39

No Duplicates.

## **Comment 21 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.**

First Name: Blake

Last Name: Simmons

Email Address: basimmo@sandia.gov

Affiliation:

Subject: 111 Scientists Ask ARB To Eliminate Bias in LCFS

Comment:

Please file for public comment and include in all documents disclosing public comment. Thanks.

Attachment: [www.arb.ca.gov/lists/lcfs-general-ws/28-phd\\_lcfs\\_mar09.pdf](http://www.arb.ca.gov/lists/lcfs-general-ws/28-phd_lcfs_mar09.pdf)

Original File Name: PhD\_LCFS\_Mar09.pdf

Date and Time Comment Was Submitted: 2009-03-02 05:56:17

No Duplicates.

## Comment 22 for Low Carbon Fuel Standard - General (lcfs-general-ws) - 1st Workshop.

First Name: Stephen

Last Name: Rush

Email Address: SLRush@ForFuelFreedom.com

Affiliation: For Fuel Freedom, Inc.

Subject: Cap & Trade Planning & Regulation Recommendations

Comment:

Recent reports by certain fiscal oversight organizations and corporations (such as PGE) speak of Cap & Trade as a bad idea that will only overburden the electric power consumer. Not exactly true. The net effect of Carbon tax / Cap & Trade - if the program is written well and well thought out - will be a good investment on the part of the taxpayer/consumer without being overly burdened through energy cost savings in time and will help energy companies not merely manage their emissions but earn profits while being environmentally conscious.

As CEO of a bio-fuels and technology company, and as an informed leader in the industry, there are many companies large and small that are looking forward to incentives and putting pressure on power plants and industrial centers to clean up their air. Despite the cost to the taxpayer and consumer initially, if this is done right will generate jobs, help stabilize the economy, and eventually reduce costs to the consumer. However, many technology companies that can perform this function are small businesses that have scaled back their workforce recently, leaving the core of their business workload to the executives and utilizing personal credit to keep their business alive. So whatever the plan that is put into place, it must account for the current economics, and my first recommendation is to waiver permitting and fees up front, but to be recaptured in taxes.

With this in mind, the bill would work to create energy jobs if carbon trade is specifically written as an investment into carbon-reducing development and expansion by companies that have anything to do with renewable fuels, sequestration, solidifying, or any such process. There are economic benefits of scrubbing CO<sub>2</sub>, since it can be used as oil extraction, deep freeze, cleaning solvent, and making algae for use as bio-diesel or high-grade jet fuel. Each company has varying technology and profitability from the next, but the important thing is making that CO<sub>2</sub> available. My second recommendation for these carbon development monies is to legislate that commodity traders must provide carbon trading brokering services when necessary, and that the cost of exchange is reasonable and is absorbed by the producer of carbon or a maximum of 3% gross profit of the user. But that is not the only consideration.

The bill would work to create energy jobs if there is a carbon tax for significant expulsion of pollutants over a certain amount, or non-compliance, and preferably that tax will increment quarterly. Without a financial burden to motivate companies to look around the various markets for profitable technologies so that they can make up the difference for the cost to capture / sequester and utilize that carbon, then that CO<sub>2</sub> would be hard to force them into looking at other forms of energy. My third recommendation then is to legislate that there be a carbon tax of around \$137 per ton of CO<sub>2</sub> or \$1,300 per MW if none of these technologies are used. If carbon generation sources do wish to utilize a carbon capture technology, then might I suggest the carbon "waiver" paid directly to the technology company in the amount of \$77 per ton of CO<sub>2</sub> or \$730 per

MW, and a minimum of 33% of the total must go toward companies with technology in some phase of development but not fully commercialized. (To give an idea, the cost to store CO2 is approximately \$165 per ton, yet the profit for our algae system is between \$10 to \$30 depending on transportation costs once constructed but our capital costs are roughly \$595 per MW.) Because technology companies may not allocate 100% to a fully functioning facility, they must reserve or grant 15% to a participating company to encourage such future building projects through a facilitated pool.

The bill would work if there was a review process to ensure inclusion of every American company that wanted to participate. So, my next recommendation is make exemptions for participants to deviate from previously established program requirement laws, in addition to the above recommendation. For example, the development and technology companies must qualify by hiring mostly in California for this project, and if there are any program bids they must be shared by percentage of the dollar amount of the next lowest bid so all that can stimulate the economy will participate, no matter their stage of development and without grant deadline.

America needs to get working again and small business need the free flow of money that comes from a plan such as this. Please give this your most undivided attention. Thank you.

Stephen L. Rush, CEO  
For Fuel Freedom, Inc.  
Inland Empire, CA 92399  
(909) 213-2750 (direct)  
SLRush@ForFuelFreedom.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-12 14:29:53

No Duplicates.

**There are no comments posted to Low Carbon Fuel Standard - General (lcfs-general-ws) that were presented during the Workshop at this time.**