

## **Comment 1 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Lisa

Last Name: McGhee

Email Address: lisa@greenpowermotor.com

Affiliation: GreenPower Motor Company

Subject: LCFS Change, GreenPower Motor Comments: Adjusted CI. MHD FCI station w/ No LDA. EER update  
Comment:

Subject: LCFS Change, GreenPower Motor

Comments: Adjusted CI. MHD FCI station w/ No LDA. EER  
update

Online Docket: due 8-8-22

[https://www.arb.ca.gov/lispub/comm/iframe\\_bcsbform.php?listname=lcfs-wkshp-jul22-ws&comm\\_period=1&\\_ga=2.263571141.890565268.1657343988-1413733057.1586491489](https://www.arb.ca.gov/lispub/comm/iframe_bcsbform.php?listname=lcfs-wkshp-jul22-ws&comm_period=1&_ga=2.263571141.890565268.1657343988-1413733057.1586491489)

We

appreciate CARB's proposal for meaningful changes in the  
future. Below & attached are comments

from GreenPower Motor Company

(GP).

Adjusted CI:

The staff needs to

present the adjusted CI model in a table that includes the details  
year over year thru 2045. This should include all of the  
components impacting the credit values (EER, CI Electricity Fuel  
pathway, Energy Density, CI Benchmark standard, LCFS Credit  
Value).

The CI Electricity

fuel pathway will decrease annually based on the power mix of the  
grid at 60% renewables by 2030 and 100% clean energy by 2045.

Therefore, the CI benchmark standard when decreased (adjusted CI)  
impacts that credit value. This is critical information as  
historically this information has created a signal that has driven  
private investments and a future decreased CI coupled with a  
cleaner energy grid will reduce the value of the base LCFS  
credit.

MHD FCI Infrastructure Crediting

Application:

The proposal to

include the BEV MHD FCI stations is necessary and can be well  
justified due to the various ZERO Emissions mandates that the MHD  
commercial vocations must meet. They face strict ZEV vehicle  
procurement mandates tied to their vehicle composition. An  
MHD program will likely prove to be more cost-effective than LDA  
toward the unused capacity that the current LDA program  
generates.

The BEV Medium-Duty

sector and vehicles can immediately perform over 90% of the fleet  
routes and jobs when supported and designed with fast charging and  
even more specifically high voltage fast charging. This  
program will help to meet the needs of the small size fleets,  
private, and independent drivers whereby this infrastructure is  
critical to support their ZEV procurement. Truck and Bus  
Dealerships, Garage Services, and Warranty support centers could be  
well aligned to implement MHD FCI stations and maybe some of the  
best locations to do so. For example, MHD commercial  
enterprise dealerships have an interest and have the opportunity to  
improve their business model as they face implementing a program to  
support EV technology. They depend on parts and services as  
their main revenue source and they have locations that could bundle  
programs to include charging as they tend to be located in urban

and densely populated hub areas and already implement a program to support customers with MHD buses and trucks. Additionally, these centers have space for these larger vehicles.

This will harmonize a solution with the mandates and an integrated EV charging model for dealerships allows for a new revenue stream from the EV charging and capacity credits.

We recommend the following in the program and consider the specific needs of the BEV MHD vehicle deployment applications and future scaling needs.

We do not recommend the program to include or be shared with LDA vehicles. The two different vehicle types and use-cases are black and white, they are not at all closely related.

The LDA cars on average travel 40 miles per day with the current BEV technology. The average new LDA BEV gets up to 300 miles per charge and averages 3 miles per kWh; thereby the LDA BEV only needs to charge on average 1 x week. The average fast-charging public station rate is \$0.43 per kWh which results in \$0.143 per mile for LDA.

However, this program should focus on MHD specifically. The MHD drivers and vehicles need ingress and egress accessibility for the larger size vehicles. They have an immediate need to get reliable access due to their larger-size battery packs that require longer charging sessions. The BEV MHD vehicle technology averages 55-200 miles per charge and will likely need to charge daily and sometimes 2 x per day for high volume mileage vocations and applications that go beyond the range and or share a vehicle. The charging experience and reliability are critical to this sector. The design and needs of the MHD sector are vastly different than the needs of the LDA. There is no synergy between these two different sizes of vehicles. We need to focus on this sector before considering a mix. This sector is sensitive to the range and long charging sessions and the experience & up-time of the BEV early adopters require a focus to get it right. Additionally, the station cost can be more cost-effective if focused on larger size commercial vocations versus mixing a design for two vastly different needs and requirements.

I suggest a program that has an incentive to encourage hub sharing for small-size fleets versus focusing on public access. There needs to be an incentive for neighbor fleets to have access to charging that could likely be installed by larger entities. Such an incentive could increase site utilization, and cost-effectiveness, local charging will reduce miles traveled, and the increased utilization could put downward pressure on the effects of demand or subscription fees. The program could include a plus-up incentive to add resiliency to the site for a 2-3 hour window during the peak hours, for example, battery storage or renewables generation, this could reduce grid constraint or capacity upgrades by the utility.

A 5-year crediting period should be the minimum, if battery storage is included the program could be either longer or shorter depending on what considerations should take place to achieve fairness for the additional investment.

The nameplate should be on a case-by-case basis. However, the Electrify America stations have been very successful. The chargers should be at a minimum of 150 to 350 kW.

Further, MHD charging infrastructure could benefit and perfectly align with your new battery storage business consideration and I would encourage a % of battery storage to be included for Peak-Time use hours (maybe a 2-hour window) to continue to support grid constraints at Peak time and establish smarter designs that benefit the technology, end-users, utility, and society.

Evaluate the site based on its location, its ability and willingness to share the

hub, open hours, parking for MHD size vehicles, and bandwidth connectivity to support DCFC charging including in more rural areas & a program to maintain specific maintenance & tolerance to keep all equipment available (running) as there is no consequences for equipment that is not available.

Update to the EER

data:

We recommend an EER data update, this is required to establish EV Vehicle Standards with the MHD Class vehicles under the baseline method.

The Current program does not logically result in a method that supports the best and most efficient MHD EVs.

We need to begin developing awareness toward an EV MHD fuel economy standard for each MHD class whereby the most efficient kWh/mile achieves more credits and more opportunities toward increased revenues.

For example:

- Class 4-6 as one category
- Class 7-8 as one category

Instead of currently all Class 4-8 in one category.

The Fuel economies from the MHD should create a standard for the specific vehicle class as the amount of battery storage that is installed in the vehicle is similar to the class size. OEMs should design the technology with quality and with the best engineering judgment and components that achieve the best fuel economy. This directly impacts the fleets and ensures the technology creates a cost-per-mile benefit.

I do not object to the fuel density equivalent method. What needs updating is another step for converting the kWh/mile efficiency to a result that is higher and better for the most efficient class of MHD EV vehicles. Moreover, with this change, the less efficient vehicles will NOT continue gaining more credits as they currently can generate

(see figure in attached pdf)

Essentially creating consideration for an average fuel economy standard for each MHD class is necessary and this will result in the best and most efficient vehicles with the most credits.

~Lisa McGhee, GreenPower Motor Company

Attachment: [www.arb.ca.gov/lists/com-attach/1-lcfs-wkshp-jul22-ws-Uj5XMIw7UXEHXgNg.pdf](http://www.arb.ca.gov/lists/com-attach/1-lcfs-wkshp-jul22-ws-Uj5XMIw7UXEHXgNg.pdf)

Original File Name: LCFS Changes, GP comments 7-7-22.pdf

Date and Time Comment Was Submitted: 2022-07-09 00:39:02

No Duplicates.

## **Comment 2 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Nate

Last Name: Underwood

Email Address: nate@fleetzero.com

Affiliation:

Subject: Expand LCFS to Containerized Ocean and Inland Waterway Shipping Immediately

Comment:

Dear CARB,

Thank you for your work to date on the Low Carbon Fuel Standard (LCFS) and for considering expansion into the maritime domain.

My company Fleetzero (<https://www.fleetzero.com/>) is going to market with battery electric ocean cargo shipping. It is our understanding that we can generate LCFS credits from charging our swappable battery energy storage systems on land, but LCFS does not currently cover ocean or inland waterway shipping of any kind.

Given battery cost reductions that are enabling the cost-effective transition to battery electric containerized shipping, we request that the LCFS immediately (as soon as the regulatory process allows) expands to cover all ocean and inland shipping. Since greenhouse gas emissions are a global pollutant, this update to LCFS should cover all emissions for containers delivered to California ports. This should include anti-leakage measures to cover attempts to tranship containers to dodge regulations (ex. shippers switch trips from China to Long Beach and instead ship China, Portland, Long Beach). If current laws authorizing LCFS do not allow covering global emissions of containers delivered to California ports, the covered geographic region should be as large as possible, but at a minimum covering California territorial waters and emissions generated in other states.

LCFS expansion to maritime transportation should also cover embedded energy of production and potential leakages during transportation and use phases from fuels such as natural gas and hydrogen.

LCFS revenue should support upfront subsidies to cover the high costs of U.S. shipbuilding, charging infrastructure, and swappable battery energy storage systems (along with competing zero emissions sustainable energy sources).

Additionally, all LCFS revenue and California programs should enable any type of ship to participate. One current issue is that some CARB programs have rules written for specific types of ships (harborcraft, ferries, etc.) and this excessive clarity can exclude freight ship types like container ships, tugs, and barges.

Thank you for all of your work on advancing emissions reductions in California, and please reach out if you have any questions.

Regards,

Nate

Head of Growth

Fleetzero

<https://www.fleetzero.com/>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-21 16:50:08

No Duplicates.

### **Comment 3 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Kathleen

Last Name: Hunt

Email Address: kahuntiwolf@gmail.com

Affiliation: Iowa Farmland Owner

Subject: LCFS

Comment:

As an Iowa Farmland owner affected by the Hazardous Carbon pipeline projects, I urge CARB to repeal the Carbon Capture and Sequestration Protocol under the Low Carbon Fuel Standard that is incentivizing carbon capture projects attached to ethanol plants in the Midwest. This is relatively new and untested technology and puts all living beings and land along the pipeline paths in danger of a hazardous rupture. We should be moving away from polluting fossil fuels and mono crop corn production. Ethanol was meant as a bridge technology to help move us towards more ecological and sustainable energy sources away from oil. We need to address the run away pollution by oil based chemical fertilizers and pesticides. Pipelines carving up the fertile midwestern farmlands is the last thing we need!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-25 12:47:15

No Duplicates.

**Comment 4 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Charles

Last Name: Davidson

Email Address: charlesdavidson@me.com

Affiliation: Rodeo Citizens Association

Subject: CARB 2022 Scoping Plan - Low Carbon Fuel Standard, hydrogenated refinery biofuels & carbon  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/4-lcfs-wkshp-jul22-ws-UTJUM10uWGkLUgIw.docx](http://www.arb.ca.gov/lists/com-attach/4-lcfs-wkshp-jul22-ws-UTJUM10uWGkLUgIw.docx)

Original File Name: CARB 2022 Scoping Plan Public Comments %22-4%22%22.docx

Date and Time Comment Was Submitted: 2022-07-25 13:50:55

No Duplicates.

## Comment 5 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.

First Name: Charles

Last Name: Davidson

Email Address: charlesdavidson@me.com

Affiliation: Rodeo Citizens Association

Subject: CARB's LCSF biofuel accrediting arbitrarily excludes tank-to-wheel CO2 emissions

Comment:

CARB's LCSF biofuel accrediting arbitrarily excludes tank-to-wheel carbon dioxide emissions

California Air Resources Board's (CARB's) current Low Carbon Fuel Standard (LCFS) should no longer regulate the exclusion of tank-to-wheel carbon dioxide emissions in their calculation of the total carbon intensity of refinery renewable diesel and biodiesel in their well-to-wheel carbon intensity assessment (or the tank-to-wake CO2 for SAF). Inclusion of tank-to-wheel emissions for Renewable Diesel (and tank-to-wake CO2 emissions for SAF) is consistent with California's climate goals and AB 32, the California Global Warming Solutions Act of 2006. The tank-to-wheel assessment for agricultural-based biofuels should be based on the same CO2 measurement methods as petroleum fuels.

AB 32 requires "in law, a sharp reduction of greenhouse gas (GHG) emissions...[which] set the stage for its transition to a sustainable, low-carbon future". For purposes of greenhouse gas emissions reduction, under the LCFS for transportation fuels and consistent with AB32, only accurate amounts of CO2 emissions should be considered when providing GHG reduction credits.

However, CARB's LCFS greenhouse gas document states that "the CO2 emitted from vehicles during biofuel combustion is considered carbon neutral, in accordance with IPCC and U.S. EPA GHG inventory guidelines, as the carbon released was uptaken from the atmosphere within a short timeframe by the plant that produced the oil. A small amount of emissions, less than 1 g/MJ, result from the GHGs (methane and nitrous oxide) that form during biodiesel combustion."  
[Italics mine.]

[LCFS Basics with Notes - California Air Resources Board. <https://ww2.arb.ca.gov/sites/default/files/2020-09/basics-notes.pdf>]

Simply because the CO2 consumed by plant growth is combusted during biofuel usage does not negate the fact that the likely use of massive, yearly biofuel feedstock production on agriculture lands results in the massive loss of natural carbon sequestration pathways on otherwise undeveloped lands (in addition to the carbon intensive depletion of soils in industrialized forced biofuel feedstock agriculture).

Researchers in Mildrexler et al "analyzed forest inventory data collected on 3,335 plots and found that large trees play a major role in the accumulated carbon stock of these forests. Tree AGC (kg) increases sharply with tree diameter...among five dominant tree species. Large trees accounted for 2.0 to 3.7%



of all stems&hellip;among five tree species; but held 33 to 46% of the total AGC stored by each species. Pooled across the five dominant species, large trees accounted for 3% of the 636,520 trees occurring on the inventory plots but stored 42% of the total AGC. A recently proposed large-scale vegetation management project that involved widespread harvest of large trees, mostly grand fir, would have removed &sim;44% of the AGC stored in these large-diameter trees, and released a large amount of carbon dioxide to the atmosphere.&rdquo;

Large Trees Dominate Carbon Storage in Forests East of the Cascade Crest in the United States Pacific Northwest Front. For. Glob. Change; Forest Management. David J. Mildrexler et al. (05 November 2020) <https://www.frontiersin.org/articles/10.3389/ffgc.2020.594274/full>

The above facts strongly argue for a policy change by CARB, that when the agency decides the greenhouse gas credit worthiness of a transportation fuel, the Low Carbon Fuel Standard should no longer arbitrarily regulate the exclusion of tank-to-wheel carbon dioxide emissions in their calculation of the total carbon intensity of renewable diesel and biodiesel (or the tank-to-wake CO<sub>2</sub> for SAF).

Attachment: [www.arb.ca.gov/lists/com-attach/8-lcfs-wkshp-jul22-ws-UDMHYANwADFQCVVn.docx](http://www.arb.ca.gov/lists/com-attach/8-lcfs-wkshp-jul22-ws-UDMHYANwADFQCVVn.docx)

Original File Name: CARB 2022 Scoping Plan Public Comments %22-5%22%22%22.docx

Date and Time Comment Was Submitted: 2022-07-25 18:44:37

No Duplicates.

**Comment 6 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Alexis  
Last Name: Moch  
Email Address: amoch@prologis.com  
Affiliation: Prologis

Subject: Prologis Comments on “Potential Changes to the Low Carbon Fuel Standard”  
Comment:

Please see attached document.

Attachment: [www.arb.ca.gov/lists/com-attach/9-lcfs-wkshp-jul22-ws-UiICdII8VGtQOVA3.pdf](http://www.arb.ca.gov/lists/com-attach/9-lcfs-wkshp-jul22-ws-UiICdII8VGtQOVA3.pdf)

Original File Name: Prologis\_Draft LCFS comments\_7.26.22\_FINAL .pdf

Date and Time Comment Was Submitted: 2022-07-26 13:27:39

No Duplicates.

**Comment 7 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: LYLE

Last Name: SCHLYER

Email Address: LSCHLYER@CALGREN.COM

Affiliation: Calgren Dairy Fuels, LLC

Subject: Comments in response to July 7th workshop

Comment:

Calgren Dairy Fuels, LLC appreciates the opportunity to submit comments regarding the July 7, 2022 LCFS workshop. Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/10-lcfs-wkshp-jul22-ws-VDdXNVUyWFQCZ1c4.docx](http://www.arb.ca.gov/lists/com-attach/10-lcfs-wkshp-jul22-ws-VDdXNVUyWFQCZ1c4.docx)

Original File Name: CDF Comments re 7-7-2022 LCFS workshop.docx

Date and Time Comment Was Submitted: 2022-07-27 15:17:19

No Duplicates.

## **Comment 8 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Michael

Last Name: Daly

Email Address: daly.lisbon@gmail.com

Affiliation:

Subject: Ethanol, LCFS and the climate crisis perspective from Rural Iowa

Comment:

On the national television news last night there was a report about the fires near Yosemite Park.

A homeowner, a fire disaster victim, was being interviewed and it was what one would be expected in this type of an interview. She had lived in this area home for more than 25 yrs. and had experienced fires before but the magnitude of this fire was unique and formidable. Then something unexpected happened. She looked straight into the camera and demanded that the coal industry in West Virginia and those who use that coal come out to Yosemite to fight the fires that burning coal is responsible for.

Her direct correlation of the fires, climate crisis and coal use made sense but it was the shouldering of responsibility that struck me.

That is similar to the use of ethanol in the California low carbon fuel incentive. We rural Iowa residents are now buried in corn fields and that

in itself is not so bad but the massive fossil fuel energy it takes to grow that corn, the water pollutants that fill our waterways and flow to the delta basin, and the depletion of soil nutrients due to the monoculture approach to agriculture, should be bad enough to influence ethical decisions about LCF. Now add to

that the dynamic and destructive changes that a Hazardous High-Pressure Critical State Carbon pipeline brings into the rural area. The construction alone wipes

old tree growth, eliminates wildlife habitat, creates an industrial Zone replacing the rural landscape. It makes living within miles of a CO2 pipeline a

daily gamble on you and your family's safety. All this CO2 pipeline business is being driven, not by brilliant and ethical environmental reasoning, but by the 45Q

tax credits and the low carbon fuel standards credits. The ethanol plants are still producing their coal fired plant emissions and capturing a very small amount of

their corn processing emissions to receive their "credits". The resulting energy intensive, power consuming pumping stations then transport the CO2 to where it

is sequestered or resold as EOR (enhanced oil recovery) to produce either a cloud below the surface whose permanent storage is suspect or produce more fossil

fuel to burn. The news coverage of the Western US fires reminds the rest of the country that we are living in a climate crisis right now. This reminder repeats itself

as tornados, floods, droughts and other weather phenomenon threaten the Midwest. Now add to that the dangers of transporting the compressed carbon.

I wonder if some night you will be watching the evening news and someone from Iowa will be interviewed about the hazardous CO2 pipeline that ruptured,

injured and killed in a rural community. Maybe that person

will look straight into the camera and demand that the California LCFS panel come to Iowa to help bury the dead, help the injured and begin the clean-up of another disaster. A man-made disaster. One that could have been avoided by better ethical environmental decisions. I urge the panel to consider the costs of ethanol production. It far outweighs the decision to continue support for the fossil fuel and the ethanol industries. A new age is upon us now. We must take bold actions in our move toward clean energy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-28 14:15:47

No Duplicates.

**Comment 9 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Jim

Last Name: Kennedy

Email Address: jim@healthyairalliance.org

Affiliation:

Subject: Healthy Air Alliance LCFS Public Comment Letter

Comment:

Please see attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/13-lcfs-wkshp-jul22-ws-Vj4AZwdnUl4DaVU2.pdf](http://www.arb.ca.gov/lists/com-attach/13-lcfs-wkshp-jul22-ws-Vj4AZwdnUl4DaVU2.pdf)

Original File Name: HAA LCFS Public Comment Letter 8.2.22.pdf

Date and Time Comment Was Submitted: 2022-08-02 13:33:45

No Duplicates.

**Comment 10 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Cody

Last Name: Finke

Email Address: cody@brimstone.energy

Affiliation: Brimstone Energy

Subject: LCFS amendments should support innovation in carbon dioxide removal

Comment:

Comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/14-lcfs-wkshp-jul22-ws-UDIHc1Y+WGZXIgh8.pdf](http://www.arb.ca.gov/lists/com-attach/14-lcfs-wkshp-jul22-ws-UDIHc1Y+WGZXIgh8.pdf)

Original File Name: Brimstone LCFS Workshop Letter\_July 2022.pdf

Date and Time Comment Was Submitted: 2022-08-03 06:31:51

No Duplicates.

**Comment 11 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Stan

Last Name: Ross

Email Address: sross@recover-energy.com

Affiliation:

Subject: Recover Comments on LCFS Workshop

Comment:

See attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/15-lcfs-wkshp-jul22-ws-AWAFcVU2Ag4BawNg.pdf](http://www.arb.ca.gov/lists/com-attach/15-lcfs-wkshp-jul22-ws-AWAFcVU2Ag4BawNg.pdf)

Original File Name: ARB LCFS Letter August 2022 Recover.pdf

Date and Time Comment Was Submitted: 2022-08-04 08:46:33

No Duplicates.



**Comment 12 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: OBrien

Email Address: rebeccaobrien@tnrenewableenergy.com

Affiliation: True North Renewable Energy, LLC

Subject: TNRE Comments Low Carbon Fuel Standard July 7 Workshop

Comment:

Please see attached TNRE's Comments on the Low Carbon Fuel Standard July 7 Workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/16-lcfs-wkshp-jul22-ws-AXUHb1EiVmAGX1Q4.pdf](http://www.arb.ca.gov/lists/com-attach/16-lcfs-wkshp-jul22-ws-AXUHb1EiVmAGX1Q4.pdf)

Original File Name: TNRE LCFS July 7 Workshop Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-08-04 08:24:08

No Duplicates.

**Comment 13 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: David

Last Name: Mann

Email Address: david.mann@oberonfuels.com

Affiliation: Oberon Fuels

Subject: Oberon Fuels Comments on July 7 LCFS Workshop

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/17-lcfs-wkshp-jul22-ws-BWpQNFw4BSRSOwBu.pdf](http://www.arb.ca.gov/lists/com-attach/17-lcfs-wkshp-jul22-ws-BWpQNFw4BSRSOwBu.pdf)

Original File Name: Oberon Fuels Comments on CARB LCFS Workshop August 4 2022 Final.pdf

Date and Time Comment Was Submitted: 2022-08-04 09:49:58

No Duplicates.

**Comment 14 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Lillian

Last Name: Mirviss

Email Address: LillianMirviss@lucidmotors.com

Affiliation: Lucid USA, Inc.

Subject: Lucid LCFS July 2022 Workshop Comments

Comment:

Please see the attached file for comments from Lucid USA, Inc. ("Lucid") on the July 2022 public workshop regarding potential changes to the Low Carbon Fuel Standard.  
Lillian Mirviss

Attachment: [www.arb.ca.gov/lists/com-attach/18-lcfs-wkshp-jul22-ws-UT1XJFAyBz1VNwlW.pdf](http://www.arb.ca.gov/lists/com-attach/18-lcfs-wkshp-jul22-ws-UT1XJFAyBz1VNwlW.pdf)

Original File Name: Lucid\_LCFSWorkshop\_Comments\_080422.pdf

Date and Time Comment Was Submitted: 2022-08-04 13:23:08

No Duplicates.

**Comment 15 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Orrock

Email Address: michelle.orrock@bp.com

Affiliation:

Subject: CARB LCFS Workshop Comments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/19-lcfs-wkshp-jul22-ws-WjhVIwRaUm0EYQlv.pdf](http://www.arb.ca.gov/lists/com-attach/19-lcfs-wkshp-jul22-ws-WjhVIwRaUm0EYQlv.pdf)

Original File Name: bp LCFS comments FINAL 8.5.2022.pdf

Date and Time Comment Was Submitted: 2022-08-04 15:12:39

No Duplicates.

**Comment 16 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: MAN

Last Name: ALTAHER

Email Address: maltaher@smartchargetech.com

Affiliation: Smart Charging Technologies

Subject: SCT Comments to LCFS Potential changes Workshop 7.7.2022

Comment:

Please see attached file

Attachment: [www.arb.ca.gov/lists/com-attach/20-lcfs-wkshp-jul22-ws-VyRVMFInUI4HYgdo.pdf](http://www.arb.ca.gov/lists/com-attach/20-lcfs-wkshp-jul22-ws-VyRVMFInUI4HYgdo.pdf)

Original File Name: SCT Comments to CARB LCFS - Comments on Proposed Changes.pdf

Date and Time Comment Was Submitted: 2022-08-04 22:22:05

No Duplicates.

**Comment 17 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: MAN

Last Name: ALTAHER

Email Address: maltaher@smartchargetech.com

Affiliation: Smart Charging Technologies

Subject: SCT Comments to LCFS Potential changes Workshop 7.7.2022

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/21-lcfs-wkshp-jul22-ws-UyBTNlMmAawDZlI9.pdf](http://www.arb.ca.gov/lists/com-attach/21-lcfs-wkshp-jul22-ws-UyBTNlMmAawDZlI9.pdf)

Original File Name: SCT Comments to CARB LCFS - Comments on Proposed Changes.pdf

Date and Time Comment Was Submitted: 2022-08-05 04:06:11

No Duplicates.

**Comment 18 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Danilo  
Last Name: Toskovic  
Email Address: danilo.toskovic@teampcs.com  
Affiliation:

Subject: Multi-Family  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/22-lcfs-wkshp-jul22-ws-AGNTNFQnAjMCWwV1.pdf](http://www.arb.ca.gov/lists/com-attach/22-lcfs-wkshp-jul22-ws-AGNTNFQnAjMCWwV1.pdf)

Original File Name: CARB Public Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-08-05 11:53:16

No Duplicates.

**Comment 19 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: Wright

Email Address: [rwright@sierravIEWSolutions.com](mailto:rwright@sierravIEWSolutions.com)

Affiliation:

Subject: Indigo Ag Comments on Updates to the LCFS  
Comment:

See attached letter

Attachment: [www.arb.ca.gov/lists/com-attach/23-lcfs-wkshp-jul22-ws-UThQOAdiAjhRMAVq.pdf](http://www.arb.ca.gov/lists/com-attach/23-lcfs-wkshp-jul22-ws-UThQOAdiAjhRMAVq.pdf)

Original File Name: Indigo\_LCFS\_CARB\_080822.pdf

Date and Time Comment Was Submitted: 2022-08-05 12:19:54

No Duplicates.



**Comment 20 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Sandra

Last Name: Soares

Email Address: institucional@etanoldemilho.com.br

Affiliation: Institucional Analyst

Subject: Comments in response to Public Workshop to Discuss Potential Future Changes to the LCFS.  
Comment:

Good Afertnoon!

Follow the comments for analysis in response  
to Public Workshop to Discuss Potential Future Changes to the LCFS  
Program, suggesting some specific topics to be evaluated by  
CARB:

LCFS Rulemaking Input- ILUC models and Renewable  
Biomass

Respectfully,  
Soares, Sandra

Attachment: [www.arb.ca.gov/lists/com-attach/24-lcfs-wkshp-jul22-ws-AG9RMV2xADAEawlm.pdf](http://www.arb.ca.gov/lists/com-attach/24-lcfs-wkshp-jul22-ws-AG9RMV2xADAEawlm.pdf)

Original File Name: Ofício UNEM 13.2022 - Carb Letter.pdf

Date and Time Comment Was Submitted: 2022-08-05 13:03:33

No Duplicates.

## **Comment 21 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Karim  
Last Name: Ibrik  
Email Address: karim@hcycle.com  
Affiliation: H Cycle, LLC

Subject: Comments on LCFS Program Staff Presentation on July 7, 2022\_H Cycle  
Comment:

To the LCFS Program:  
H Cycle, LLC appreciates the California Air Resources Board moving forward with the informal rulemaking of the LCFS Program, the staff presentation regarding potential changes to the LCFS Program, as well as the opportunity to provide comments to this process. Attached you will find our comments regarding LCFS Program changes proposed at the workshop, as well as our comments and recommendations pertaining to issues of primary importance to H Cycle, a leading company in the waste-to-hydrogen sector.  
Thank you,  
Karim Ibrik, on behalf of H Cycle LLC

Attachment: [www.arb.ca.gov/lists/com-attach/25-lcfs-wkshp-jul22-ws-UDNcO1UmU2JSCwZ1.pdf](http://www.arb.ca.gov/lists/com-attach/25-lcfs-wkshp-jul22-ws-UDNcO1UmU2JSCwZ1.pdf)

Original File Name: CARB Staff Presentation\_H Cycle Comment\_080322.pdf

Date and Time Comment Was Submitted: 2022-08-05 13:59:47

No Duplicates.

**Comment 22 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: David  
Last Name: Schlosberg  
Email Address: david@terawattinfrastructure.com  
Affiliation: TeraWatt Infrastructure, Inc.

Subject: TeraWatt Infrastructure Comments on the July 7, 2022, LCFS Workshop  
Comment:

Attached are TeraWatt Infrastructure's Comments on the July 7, 2022, LCFS Workshop &ndash; Potential Future Changes to the LCFS Program

Attachment: [www.arb.ca.gov/lists/com-attach/26-lcfs-wkshp-jul22-ws-AXVUNwd0ADIGd1Iz.pdf](http://www.arb.ca.gov/lists/com-attach/26-lcfs-wkshp-jul22-ws-AXVUNwd0ADIGd1Iz.pdf)

Original File Name: TeraWatt LCFS Comments August 2022 .pdf

Date and Time Comment Was Submitted: 2022-08-05 14:19:11

No Duplicates.

**Comment 23 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Andy

Last Name: Foster

Email Address: andy.foster@aemetis.com

Affiliation: Aemetis, Inc.

Subject: CARB LCFS Scoping Plan - Aemetis Comments

Comment:

Please find attached comments by Aemetis, Inc. in regards to the July 7, 2022 CARB LCFS Scoping Plan Workshop.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/27-lcfs-wkshp-jul22-ws-AmNUN1Q4BDJVJwBp.pdf](http://www.arb.ca.gov/lists/com-attach/27-lcfs-wkshp-jul22-ws-AmNUN1Q4BDJVJwBp.pdf)

Original File Name: Aemetis\_Comments\_CARB Scoping Plan\_08082022\_.pdf

Date and Time Comment Was Submitted: 2022-08-05 15:58:46

No Duplicates.

**Comment 24 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Leeor  
Last Name: Alpern  
Email Address: lalpern@worldenergy.net  
Affiliation: World Energy

Subject: World Energy LCFS Workshop comments  
Comment:

Attached please find World Energy's comments on the July 7th  
LCFS workshop.  
Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/28-lcfs-wkshp-jul22-ws-UmBcaAEwAGsBNwQx.pdf](http://www.arb.ca.gov/lists/com-attach/28-lcfs-wkshp-jul22-ws-UmBcaAEwAGsBNwQx.pdf)

Original File Name: 220805 World Energy Comments on the July 7 LCFS Workshop - 8.5.22.pdf

Date and Time Comment Was Submitted: 2022-08-05 21:27:49

No Duplicates.

## **Comment 25 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Becker

Email Address: tbeckerpower@gmail.com

Affiliation: T Becker Power Systems

Subject: Liquid renewable fuel content goals.

Comment:

- I have submitted comments on both the ACC II regulation and the 2022 Draft Climate Change Scoping Plan.
- In my submitted comments, I request that CARB staff prepare an alternative analysis to the ACC II regulation. That alternative calls for replacing the parts of the ACC II that require a waiver from the U.S EPA with a statewide renewable liquid fuel standard of 25% content renewable fuel by 2030 and 50% by 2040.
- My request for an alternative analysis is made under CEQA, which requires CARB staff to analyze environmentally superior alternatives, and prepare a comparative analysis of the proposed alternative to the proposed projects in the regulation.
- When CARB submits a waiver request to U.S EPA, CARB must show it did not act in an arbitrary or capricious manner. Failing to prepare an analysis of an alternative to a project that requires an EPA waiver is arbitrary and capricious.

Thank you

Tom Becker

Buellton, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-06 08:53:29

No Duplicates.

## **Comment 26 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Daryl

Last Name: Maas

Email Address: hannah.huffines@maasenergy.com

Affiliation: Maas Energy Works, Inc.

Subject: Public Comment - Potential Changes to the Low Carbon Fuel Standard  
Comment:

Thank you for the opportunity to provide comments on the recent summer 2022 CARB Workshop. As the largest developer of dairy biogas projects supplying the California LCFS, Maas Energy Works is grateful for the market opportunity presented by CARB's LCFS program.

We look forward to working with CARB to achieve the methane mitigation goals laid out in CARB's March 2022 "Analysis of Progress toward Achieving the 2030 Dairy and Livestock Sector Methane Emissions Target." As detailed therein, the dairy digester industry has rapidly deployed biomethane projects on a level that was unheard of five years ago.

Until 2015, our company was almost exclusively focused on building digesters that would combust their biogas onsite in a lean-burn internal combustion engine to create electricity for delivery to the power grid. As the LCFS program and other state policies, such as SB-1383 and the California Department of Food and Agriculture's Dairy Digester Research and Development Program, emerged and matured in the second half of the past decade, the dairy digester business model changed. These state programs encouraged developers to abandon the power generation business model and instead switch to pipeline injection of biomethane. As stated by many state agencies at the time, the switch to these new injection projections would achieve a variety of air quality, short lived climate pollutant, and other statewide goals.

As a business proposition, the switch to pipeline injection looked daunting. Gaining access to the natural gas pipeline is much more expensive and slower than power grid access. The size and scale of digester projects had to increase 5-10 times to make pipeline injection a reality. Our industry had to raise large sums of money, prove out new technologies, and take substantial other risks to build this new system. Furthermore, in terms of simple commodity prices, natural gas has a lower market value in California than electricity.

The digester industry's switch to pipeline injection made no sense but for one fact: the potential revenue from pipeline injected biomethane was much higher due to the premium created by supplying this gas into the LCFS market (RFS values were much lower at the time). So at the request of the state, we made the switch. Many other companies made similar investments in dairy biomethane, such that Compressed Natural Gas is now the first fuel in California to be net carbon negative.

I can happily report that CARB has largely maintained its technology neutral approach to the LCFS and thus rewarded those fuels that create the largest carbon intensity reductions. However, changes in the overall fuels market have put in danger the investments in low carbon fuels that we and others have made. If the state wants to continue encouraging companies to grow the biomethane industry and other low carbon fuels, we suggest two

changes to the program.

Lower LCFS Planned  
Reductions from 20% to 30%.

First, we support increasing the target reduction from 20% to at least 30% by 2030, implemented beginning in 2024. Technologies and investments have proven that such reductions are achievable with existing technology in the near term. Without such a change, LCFS runs the risk of being a victim of its own success. That is, companies respond to the CARB program by supplying so many low-carbon fuels that the market becomes saturated. This kind of over-supply cycle is common in renewable energy and low carbon incentive programs and the resultant losses of businesses in these markets can serve as an object lesson to others and create a chilling effect on future businesses and investors. Thankfully, CARB does not have to allow this to happen. The LCFS rulemaking process gives CARB the ability to respond to real world developments such as the success of many low carbon fuels businesses, and the drop in transportation fuel consumption due to COVID and the growth of ZEVs. We encourage CARB to use that authority now to prevent an oversupply situation, and all the detrimental impacts that follow therefrom.

Limited Cultivated  
Biofuels to Prevent Oversaturation

Second, on the topic of oversupply, we support a cap on the quantity of lipid-based, non-waste feedstocks for biofuels dispensed in the LCFS. We recommend a limit based on the amount of biofuels supplied to California over a historic period prior to the LCFS implementation. As a company dedicated to recovering naturally-occurring gases from manure, we are very aware of the difference between harvesting a waste product for beneficial use and growing lipid-based feedstock simply for energy production. The dairy biogas industry is routinely scrutinized to prove that our LCFS benefits result from truly additional reductions in methane emissions. We cannot increase the amount of manure in the country simply to create more carbon-negative fuel and thus claim more LCFS benefits. But some portions of the biofuels industry can perform exactly that feedstock multiplication to increase their volume in the program. Left unchecked, this practice will flood the LCFS market with farmed energy crop fuels.  
Thank you for your consideration of these comments.

Attachment: [www.arb.ca.gov/lists/com-attach/31-lcfs-wkshp-jul22-ws-BTdRZwAzVzYBWFAz.docx](http://www.arb.ca.gov/lists/com-attach/31-lcfs-wkshp-jul22-ws-BTdRZwAzVzYBWFAz.docx)

Original File Name: 2022 CARB Workshop Public Comment..docx

Date and Time Comment Was Submitted: 2022-08-07 15:03:34

No Duplicates.



**Comment 27 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Mandy

Last Name: Garrahan

Email Address: [mandy.garrahan@valero.com](mailto:mandy.garrahan@valero.com)

Affiliation:

Subject: Comments on July 7, 2022 LCFS Public Workshop

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/32-lcfs-wkshp-jul22-ws-UDpQI1E8WXNWD1Rm.pdf](http://www.arb.ca.gov/lists/com-attach/32-lcfs-wkshp-jul22-ws-UDpQI1E8WXNWD1Rm.pdf)

Original File Name: July 2022 LCFS Workshop - Valero Comments v.F.pdf

Date and Time Comment Was Submitted: 2022-08-07 19:35:53

No Duplicates.

**Comment 28 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Alexa  
Last Name: Combelic  
Email Address: [acombelic@soy.org](mailto:acombelic@soy.org)  
Affiliation: American Soybean Association

Subject: American Soybean Assn & National Oilseed Processors Assn - July LCFS Workshop Comments  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/33-lcfs-wkshp-jul22-ws-W2lVY1NgWDlRegQ0.pdf](http://www.arb.ca.gov/lists/com-attach/33-lcfs-wkshp-jul22-ws-W2lVY1NgWDlRegQ0.pdf)

Original File Name: 2022-08-08 -- ASA NOPA Comments - CARB LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 06:48:31

No Duplicates.

**Comment 29 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: John

Last Name: O'Donnell

Email Address: john@rondo.energy

Affiliation: Rondo Energy

Subject: LCFS Workshop Comments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/34-lcfs-wkshp-jul22-ws-WmgGMIZnVT4KPAQ8.pdf](http://www.arb.ca.gov/lists/com-attach/34-lcfs-wkshp-jul22-ws-WmgGMIZnVT4KPAQ8.pdf)

Original File Name: 220808b Rondo LCFS July 2022 .pdf

Date and Time Comment Was Submitted: 2022-08-08 08:12:19

No Duplicates.

**Comment 30 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Brian

Last Name: McDonald

Email Address: bcmcdonald@marathonpetroleum.com

Affiliation: MPC

Subject: Comments to LCFS workshop

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/35-lcfs-wkshp-jul22-ws-WjcCdFU3V1sEYVU6.pdf](http://www.arb.ca.gov/lists/com-attach/35-lcfs-wkshp-jul22-ws-WjcCdFU3V1sEYVU6.pdf)

Original File Name: MPC comments \_ 7.7.22\_ CARB LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 08:18:09

No Duplicates.

**Comment 31 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Brian

Last Name: Jennings

Email Address: bjennings@ethanol.org

Affiliation: American Coalition for Ethanol

Subject: Comments on Potential Changes to LCFS

Comment:

Please see attached comments from the American Coalition for Ethanol

Attachment: [www.arb.ca.gov/lists/com-attach/36-lcfs-wkshp-jul22-ws-VzZSNwNnVFhVMFc4.pdf](http://www.arb.ca.gov/lists/com-attach/36-lcfs-wkshp-jul22-ws-VzZSNwNnVFhVMFc4.pdf)

Original File Name: ACE Comments to CARB 8.8.22.pdf

Date and Time Comment Was Submitted: 2022-08-08 08:39:02

No Duplicates.

## **Comment 32 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Amanda

Last Name: Parsons DeRosier

Email Address: Amanda.DeRosier@gceholdings.com

Affiliation:

Subject: Comments on the Draft 2022 Climate Change Scoping Plan Update

Comment:

August 8, 2022

Liane M. Randolph  
Chair California Air Resources  
Board  
1001 I Street Sacramento, CA  
95814

RE: Comments on the Draft 2022  
Climate Change Scoping Plan Update

Dear Chair Randolph and Members of  
the California Air Resources Board (CARB):

Global Clean

Energy is a California-based renewable fuels innovator producing ultra-low carbon renewable fuels from patented nonfood camelina varieties. Thank you for the opportunity to comment on the 2022 Draft Climate Change Scoping Plan Update.

Global Clean Energy is committed to advancing climate reduction targets to improve air quality throughout the Golden State. We support CARB's proposal to accelerate carbon reduction targets 30 percent by 2030. Given the push to fully decarbonize California by 2045 (EO B5518) we see heightened reduction as beneficial to achieving these goals, while recognizing that renewable fuels can play a pivotal role in meeting these targets. We appreciate CARB taking biofuels' unique attributes into account when crafting this updated scoping plan.

One of the fuels

we create, renewable diesel, is especially helpful in achieving the state's decarbonization goals. Renewable diesel significantly reduces criteria pollution, including NOx and PM, as well as reducing GHG emissions by up to 85% (depending on feedstock). In fact, according to CARB's Renewable Diesel Workshop<sup>1</sup>, using renewable diesel on all tier 0-4i equipment in the San Joaquin Valley (2025) would reduce NOx emissions by 0.55 tpd and PM2.5 emissions by 0.073 tpd. Renewable Diesel has fewer GHG and local emissions than both traditional diesel and biodiesel fuels, acts as a drop-in replacement for modern traditional diesel engines with no blending required, and unlike ZEVs, does not require largescale infrastructure replacement. In addition, renewable diesel is readily available across the majority of California and is at cost parity with CARB ULSD.

In addition to producing renewable diesel, we also produce renewable propane, naphtha, and butane. These renewable byproducts can then be used to support further reduction of GHG and other emissions in California. For example, renewable propane from camelina for

school buses, forklifts, and other equipment would have the same low CI as renewable diesel and would produce lower NOx and PM than traditional diesel or gasoline. Renewable naphtha and butane also help lower the GHGs and production costs associated with gasoline as they are used as a gasoline blendstock.

We understand from public workshops that CARB is seeking input on reducing lipid-based feedstocks for renewable fuels so as to not advance food vs. fuel concerns or cause indirect land use change. We would urge CARB to consider an exemption for certain lipid-based feedstocks certified as low ILUC-risk, similar to the European Union's RED II directive.

Global Clean Energy's primary renewable fuel feedstock, our patented camelina, is a lipid-based feedstock that is nonfood, grows between traditional crop cycles on dryland farms, and does not contribute to land use change. Further, camelina has the potential to be the lowest carbon renewable fuel feedstock on the market.

Camelina-based renewable fuels produced by Global Clean Energy have an ultra-low carbon intensity (CI) score that has the potential to go below zero. We were issued a first-of-its-kind LCFS pathway by CARB in 2015. For reference, camelina is an oilseed crop, member of the mustard seed family and a distant relative of the canola plant.

Global Clean Energy's camelina is grown domestically and contributes to rural economic development by providing farmers additive income on land otherwise left idle. Further, our company's vertically integrated structure allows us to drive down our lifecycle carbon emissions. Through streamlined operations and identifying efficiencies, we expect to reduce our carbon emissions to single digits or below in coming years.

Our Bakersfield Renewable Fuels Refinery, which is anticipated to begin production later this year, is actively contributing to the "Just Transition" from fossil fuels to clean energy careers and has a nameplate capacity of 15,000 barrels per day or over 200 million gallons per year. Our fuels will be readily available to the California market through existing distribution agreements, and we expect the San Joaquin Valley's agricultural and trucking sectors to consume much of what we produce.

Given camelina-based fuels' positive traits, we encourage CARB to exempt it from any lipid-based feedstock restrictions. Enacting these changes will ensure our company and others can continue to produce renewable fuels in California that further the domestic clean energy supply, lower carbon emissions, and strengthen our state's clean energy economy.

Further, as CARB seeks to implement the goals of EO N7920, we encourage you to prioritize the use of renewable diesel in medium and heavy-duty vehicles. There are no technical, supply, or financial reasons why medium and heavy-duty vehicles cannot switch to renewable diesel use rather than ZEVs to support CARB's carbon reduction objectives. By encouraging renewable fuels' heightened use in these applications, CARB can help to ensure limited economic impacts on businesses that would otherwise have to replace their existing vehicle fleets while achieving environmental objectives.

Renewable diesel can also be used as a fuel source for rail, agricultural equipment, commercial harbor craft, and airport ground support equipment as

well as aviation fuel &ndash; other stated carbon reduction targets of your agency &ndash; all of which are fuel options our company is exploring at our Bakersfield site.

We appreciate CARB taking the benefits of renewable fuels produced using camelina into account in its rule making process and encourage you to consider enacting the above-mentioned low ILUC lipid-based feedstock exemptions to further advance California's emissions reduction targets.

Sincerely,

Amanda Parsons DeRosier  
Vice President of Investor Relations  
and Public Affairs  
Global Clean Energy | [www.GCEholdings.com](http://www.GCEholdings.com)  
[Amanda.DeRosier@GCEholdings.com](mailto:Amanda.DeRosier@GCEholdings.com)  
562-233-5146

[https://ww2.arb.ca.gov/sites/default/files/2021-09/ORD\\_Amendment\\_Workgroup-Renewable\\_Diesel.pdf](https://ww2.arb.ca.gov/sites/default/files/2021-09/ORD_Amendment_Workgroup-Renewable_Diesel.pdf)

Attachment: [www.arb.ca.gov/lists/com-attach/37-lcfs-wkshp-jul22-ws-WjlRNlwvVGVRCA16.pdf](http://www.arb.ca.gov/lists/com-attach/37-lcfs-wkshp-jul22-ws-WjlRNlwvVGVRCA16.pdf)

Original File Name: CARB SCOPING LETTER GCE Final.pdf

Date and Time Comment Was Submitted: 2022-08-08 08:36:54

No Duplicates.



**Comment 33 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Nancy  
Last Name: Young  
Email Address: nyoung@alderfuels.com  
Affiliation: Alder Fuels

Subject: Alder Fuels Comments on July 7, 2022 LCFS Workshop Issues  
Comment:

Please see the attached comment letter. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/38-lcfs-wkshp-jul22-ws-UTBdN1I3BzFSJgZZ.pdf](http://www.arb.ca.gov/lists/com-attach/38-lcfs-wkshp-jul22-ws-UTBdN1I3BzFSJgZZ.pdf)

Original File Name: Alder Fuels Comments-July 7 LCFS Workshop-8-8-22.pdf

Date and Time Comment Was Submitted: 2022-08-08 08:58:30

No Duplicates.

**Comment 34 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Kelly

Last Name: Davis

Email Address: kdavis@ethanolrfa.org

Affiliation: Renewable Fuels Association

Subject: LCFS Modifications comments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/39-lcfs-wkshp-jul22-ws-BnRUNARkU14DZIM8.pdf](http://www.arb.ca.gov/lists/com-attach/39-lcfs-wkshp-jul22-ws-BnRUNARkU14DZIM8.pdf)

Original File Name: RFA comments-LCFS modifications\_080822 submission.pdf

Date and Time Comment Was Submitted: 2022-08-08 09:27:47

No Duplicates.

**Comment 35 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Dan

Last Name: Bowerson

Email Address: dbowerson@autosinnovate.org

Affiliation: Alliance for Automotive Innovation

Subject: Auto Innovators Comments on CA LCFS Potential Changes

Comment:

Please find the attached comments from the Alliance for Automotive Innovation in response to CARB's July 7 workshop on potential changes to the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/40-lcfs-wkshp-jul22-ws-UTAHdARxU29VDANq.pdf](http://www.arb.ca.gov/lists/com-attach/40-lcfs-wkshp-jul22-ws-UTAHdARxU29VDANq.pdf)

Original File Name: Auto Innovators\_CARB LCFS Potential Changes Workshop (August 8 2022).pdf

Date and Time Comment Was Submitted: 2022-08-08 10:54:57

No Duplicates.

## **Comment 36 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Camille

Last Name: Soriano

Email Address: camille@casugarcane.com

Affiliation: California Ethanol & Power, LLC

Subject: LCFS Comments from July 7, 2022 Workshop

Comment:

We appreciate the opportunity to comment on the July 7, 2022, Low Carbon Fuel Standard (LCFS) workshop. Please find our comments attached from California Ethanol + Power, LLC. If you should have any questions, please contact Camille Soriano at camille@casugarcane.com or 760-332-8454.

As highlighted in during the workshop, the LCFS has been tremendously successful in supporting a wide array of low-carbon fuels. We encourage CARB to amend the program in a manner that builds on this success and ensures the program continues to play a critical role in decarbonizing fuels, and the existing vehicles that use them, for decades into the future.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/41-lcfs-wkshp-jul22-ws-VjUHZAFwBwsDaVc0.pdf](http://www.arb.ca.gov/lists/com-attach/41-lcfs-wkshp-jul22-ws-VjUHZAFwBwsDaVc0.pdf)

Original File Name: CEP\_LCFS\_Comments\_July 2022 Workshop Final.pdf

Date and Time Comment Was Submitted: 2022-08-08 11:01:30

No Duplicates.

**Comment 37 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Gary  
Last Name: Hughes  
Email Address: garyhughes.bfw@gmail.com  
Affiliation: Biofuelwatch

Subject: Soy Is The New Palm  
Comment:

Thank you for your consideration of the attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/42-lcfs-wkshp-jul22-ws-UTMAb1M9AjcAc1Qx.pdf](http://www.arb.ca.gov/lists/com-attach/42-lcfs-wkshp-jul22-ws-UTMAb1M9AjcAc1Qx.pdf)

Original File Name: Biofuelwatch\_July7LCFSWorkshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 11:02:16

No Duplicates.

**Comment 38 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Graham

Last Name: Noyes

Email Address: graham@noyeslawcorp.com

Affiliation: NLC for Koloma, Inc.

Subject: Koloma Comments Pertaining to Hydrogen LCFS Regulatory Recommendations  
Comment:

Attached please find the comments of Koloma, Inc. regarding recommended changes to the LCFS regulatory structure that would enable the more rapid expansion of hydrogen consistent with the Draft 2022 Scoping Plan Update and California's 2030 and 2045 climate goals. Koloma's comment makes the following recommendations:

- \*Book-and-Claim Accounting for Hydrogen in Transportation Applications

- \*Book-and-Claim Accounting for Hydrogen Used as a Process Energy in Facilities

- \*Expansion of the Tier 1 Calculator to Recognize More Hydrogen Pathways and Fuels Containing Hydrogen

- \*Recognition and Valuation of Carbon Mineralization for CCS

- \*Expanding Hydrogen Refueling Infrastructure for Medium and Heavy-Duty Vehicles

Koloma's complete comment is attached. Please contact me if there are any issues with the transmission, or for any discussions relating to these comments. Koloma appreciates the opportunity to provide comments to CARB regarding the LCFS regulatory changes.

Best Regards,

Graham Noyes

Noyes Law Corporation for Koloma, Inc.

www.fuelandcarbonlaw.com

Attachment: [www.arb.ca.gov/lists/com-attach/43-lcfs-wkshp-jul22-ws-AmkAaQBtBTkFblQ1.pdf](http://www.arb.ca.gov/lists/com-attach/43-lcfs-wkshp-jul22-ws-AmkAaQBtBTkFblQ1.pdf)

Original File Name: Koloma Comment RE LCFS Rulemaking 7 August 2022 Final.pdf

Date and Time Comment Was Submitted: 2022-08-08 11:03:29

No Duplicates.

**Comment 39 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Graham

Last Name: Noyes

Email Address: graham@noyeslawcorp.com

Affiliation: NLC for Bayer Crop Science

Subject: Bayer Crop Science Comment to LCFS Rulemaking RE: Climate Smart Agriculture  
Comment:

Dear Clerk of the Board

Attached please find

the comments of Bayer Crop Science (Bayer) regarding recommended changes to the LCFS regulatory structure pertaining to climate smart agriculture. The implementation of these recommendations would harness the tremendous potential of agriculture and soils to better enable fulfillment of California's 2030 and 2045 climate goals.

Bayer's complete comment is attached. Please contact me if there are any issues with the transmission, or for any discussions relating to these comments. Bayer appreciates the opportunity to provide comments to CARB regarding the LCFS regulatory program.

Best

Regards,

Graham

Noyes

Noyes Law Corporation

for Bayer

[www.fuelandcarbonlaw.com](http://www.fuelandcarbonlaw.com)

Attachment: [www.arb.ca.gov/lists/com-attach/44-lcfs-wkshp-jul22-ws-UDIFYgN7V2FWIAP.pdf](http://www.arb.ca.gov/lists/com-attach/44-lcfs-wkshp-jul22-ws-UDIFYgN7V2FWIAP.pdf)

Original File Name: Bayer LCFS Comment CARB Letter\_CSA FINAL.pdf

Date and Time Comment Was Submitted: 2022-08-08 11:03:29

No Duplicates.

**Comment 40 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Julia

Last Name: Levin

Email Address: jlevin@bioenergyca.org

Affiliation: Bioenergy Association of California

Subject: BAC Comments on Proposed Changes to the LCFS

Comment:

BAC's comments on proposed changes to the LCFS are attached.

Attachment: [www.arb.ca.gov/lists/com-attach/45-lcfs-wkshp-jul22-ws-AWMFYgZkVVkKb1M8.pdf](http://www.arb.ca.gov/lists/com-attach/45-lcfs-wkshp-jul22-ws-AWMFYgZkVVkKb1M8.pdf)

Original File Name: BAC Comments on July 2022 LCFS Staff Presentation (final).pdf

Date and Time Comment Was Submitted: 2022-08-08 11:38:32

No Duplicates.



**Comment 41 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Julian  
Last Name: Sanchez  
Email Address: sanchezjulian@johndeere.com  
Affiliation:

Subject: Deere & Company comments on July 7th LCFS Workshop  
Comment:

Please find Deere & Company's comments on the recent LCFS workshop attached.

Attachment: [www.arb.ca.gov/lists/com-attach/47-lcfs-wkshp-jul22-ws-BjRXYVVmUzIAWVJi.pdf](http://www.arb.ca.gov/lists/com-attach/47-lcfs-wkshp-jul22-ws-BjRXYVVmUzIAWVJi.pdf)

Original File Name: 2022\_08\_LCFS\_Final.pdf

Date and Time Comment Was Submitted: 2022-08-08 11:51:03

No Duplicates.

**Comment 42 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Adam  
Last Name: Comora  
Email Address: acomora@opalfuels.com  
Affiliation: Opal Fuels LLC

Subject: Comments re: Public Workshop to Discuss Potential Changes to LCFS Regulation; July 7, 2022  
Comment:

Opal Fuels LLC appreciates the opportunity to submit comments in response to the July 7, 2022, Public Workshop to Discuss Potential Changes to the LCFS. Please see our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/48-lcfs-wkshp-jul22-ws-AjAGMlNiBG9VYwE5.pdf](http://www.arb.ca.gov/lists/com-attach/48-lcfs-wkshp-jul22-ws-AjAGMlNiBG9VYwE5.pdf)

Original File Name: 220808\_Opal Comments to LCFS Workshop\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-08-08 11:50:24

No Duplicates.

**Comment 43 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

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

Subject: CIPA LCFS Workshop Comments  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/49-lcfs-wkshp-jul22-ws-VzRSPQBxBDYBWFA8.pdf](http://www.arb.ca.gov/lists/com-attach/49-lcfs-wkshp-jul22-ws-VzRSPQBxBDYBWFA8.pdf)

Original File Name: CIPA LCFS comments August 8 2022.pdf

Date and Time Comment Was Submitted: 2022-08-08 11:57:59

No Duplicates.

**Comment 44 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Lowell

Last Name: Randel

Email Address: lrandel@gcca.org

Affiliation: Global Cold Chain Alliance

Subject: Comments on Potential Changes to the LCFS Program

Comment:

Please see attached comments on potential changes to the LCFS Program from the Global Cold Chain Alliance.

Attachment: [www.arb.ca.gov/lists/com-attach/50-lcfs-wkshp-jul22-ws-B2BWMwRmWGpSC1A8.pdf](http://www.arb.ca.gov/lists/com-attach/50-lcfs-wkshp-jul22-ws-B2BWMwRmWGpSC1A8.pdf)

Original File Name: GCCA LCFS Comment Letter - FINAL.pdf

Date and Time Comment Was Submitted: 2022-08-08 12:03:04

No Duplicates.

**Comment 45 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Ian

Last Name: Thomson

Email Address: ithomson@advancedbiofuels.ca

Affiliation: Advanced Biofuels Canada

Subject: Comments: Potential Changes to the Low Carbon Fuel Standard

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/51-lcfs-wkshp-jul22-ws-UTJTnFQnVGUGXwBh.pdf](http://www.arb.ca.gov/lists/com-attach/51-lcfs-wkshp-jul22-ws-UTJTnFQnVGUGXwBh.pdf)

Original File Name: CARB\_AdvancedBiofuelsCda comments\_05Aug2022.pdf

Date and Time Comment Was Submitted: 2022-08-08 11:53:14

No Duplicates.

**Comment 46 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Kathy  
Last Name: Bergren  
Email Address: bergren@ncga.com  
Affiliation: NCGA

Subject: NCGA Comments on the July 7 LCFS Workshop  
Comment:

Attached please find our comments

Attachment: [www.arb.ca.gov/lists/com-attach/52-lcfs-wkshp-jul22-ws-Uz9RNFcwUXEGXwRz.pdf](http://www.arb.ca.gov/lists/com-attach/52-lcfs-wkshp-jul22-ws-Uz9RNFcwUXEGXwRz.pdf)

Original File Name: LCFS Workshop Comments\_National Corn Growers Association\_August 8 2022.pdf

Date and Time Comment Was Submitted: 2022-08-08 12:41:02

No Duplicates.

**Comment 47 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Kristin

Last Name: Henningson

Email Address: kristin.henningson@valero.com

Affiliation:

Subject: Comments on July 7, 2022 LCFS Workshop

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/53-lcfs-wkshp-jul22-ws-U2Fda1RnBWRWfQIy.pdf](http://www.arb.ca.gov/lists/com-attach/53-lcfs-wkshp-jul22-ws-U2Fda1RnBWRWfQIy.pdf)

Original File Name: 2022-08 Valero LCFS Amendment Comments FINAL.pdf

Date and Time Comment Was Submitted: 2022-08-08 12:41:28

No Duplicates.

**Comment 48 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Kent

Last Name: Engelbrecht

Email Address: kent.engelbrecht@adm.com

Affiliation: ADM

Subject: Potential Changes to the Low Carbon Fuel Standard

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/54-lcfs-wkshp-jul22-ws-AWBXNVwwBwsFbwFi.pdf](http://www.arb.ca.gov/lists/com-attach/54-lcfs-wkshp-jul22-ws-AWBXNVwwBwsFbwFi.pdf)

Original File Name: ADM LCFS comments 080822.pdf

Date and Time Comment Was Submitted: 2022-08-08 12:50:33

No Duplicates.



**Comment 49 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Michael

Last Name: Boccadoro

Email Address: mboccadoro@westcoastadvisors.com

Affiliation: Dairy Cares

Subject: Dairy Cares Comments on the July 7, 2022 Public Workshop to Discuss Potential Changes to t  
Comment:

Please see comments attached. Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/56-lcfs-wkshp-jul22-ws-AjAGMIznWTJWYAgw.pdf](http://www.arb.ca.gov/lists/com-attach/56-lcfs-wkshp-jul22-ws-AjAGMIznWTJWYAgw.pdf)

Original File Name: 220808 Dairy Cares Comments on the 7-7-22 LCFS Workshop (00583153-2xBA8E1).pdf

Date and Time Comment Was Submitted: 2022-08-08 13:02:16

No Duplicates.

**Comment 50 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Mark

Last Name: Stoermann

Email Address: mstoerm@newtrient.com

Affiliation: Newtrient LLC

Subject: Newtrient Comments to CARB July 7th LCFS Workshop

Comment:

Newtrient LLC respectfully offers the attached comments to the California Air Resources Board (CARB) in response to the CARB July 7th Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/57-lcfs-wkshp-jul22-ws-UD5WNVAmUnUGcgRt.pdf](http://www.arb.ca.gov/lists/com-attach/57-lcfs-wkshp-jul22-ws-UD5WNVAmUnUGcgRt.pdf)

Original File Name: Newtrient Comments CARB July 7th LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 13:02:38

No Duplicates.

**Comment 51 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Suzanne

Last Name: Hunt

Email Address: [suzanne.hunt@generatecapital.com](mailto:suzanne.hunt@generatecapital.com)

Affiliation: Generate Capital, PBC

Subject: Generate Capital, PBC's comments regarding changes to the LCFS

Comment:

Dear CARB Staff and Board,  
We respectfully submit our comments. Attached.  
Best,  
Suzanne Hunt  
Director, Policy  
Generate Capital,  
PBC

Attachment: [www.arb.ca.gov/lists/com-attach/58-lcfs-wkshp-jul22-ws-UDcCYQdoBDIBdQRI.pdf](http://www.arb.ca.gov/lists/com-attach/58-lcfs-wkshp-jul22-ws-UDcCYQdoBDIBdQRI.pdf)

Original File Name: Generate Capital Comments - Potential Changes to CA LCFS - Aug 2022 - Final.pdf

Date and Time Comment Was Submitted: 2022-08-08 13:05:37

No Duplicates.

**Comment 52 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Graham  
Last Name: Noyes  
Email Address: graham@noyeslawcorp.com  
Affiliation: NLC for FS Bioenergia

Subject: FS Bioenergia Comment RE: LCFS Rulemaking  
Comment:

Dear Clerk of the  
Board

Attached please find the comments of FS Bioenergia (FS) regarding recommended changes to the LCFS regulatory structure pertaining to the following issues:

\*Recognition within CA-GREET of the benefits of sequential cropping that substantially improves the yields and economics of existing agricultural lands

\*Establishment of default values within the Tier 1 calculator for crops produced under a system of sequential cropping

\*Recognition of purpose-grown woody biomass as carbon neutral in a manner consistent with IPCC's treatment of this material  
FS'

complete comment is attached. Please contact me if there are any issues with the transmission, or for any discussions relating to these comments. FS appreciates the opportunity to provide comments to CARB regarding the LCFS regulatory program.

Best Regards,  
Graham Noyes  
Noyes Law Corporation for FS  
Bioenergia  
www.fuelandcarbonlaw.com

Attachment: [www.arb.ca.gov/lists/com-attach/59-lcfs-wkshp-jul22-ws-BWZdNAZqWWdQM1U7.pdf](http://www.arb.ca.gov/lists/com-attach/59-lcfs-wkshp-jul22-ws-BWZdNAZqWWdQM1U7.pdf)

Original File Name: Comments on July 7th\_FS\_Discuss Potential Changes to the Low Carbon Fuel Standard.pdf

Date and Time Comment Was Submitted: 2022-08-08 13:26:50

No Duplicates.

**Comment 53 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Christina

Last Name: Tan

Email Address: christina.tan@bloomenergy.com

Affiliation:

Subject: Bloom Energy Corporation's Comments on Potential Changes to the LCFS  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/60-lcfs-wkshp-jul22-ws-UzBVPFY6WWcFZIM9.pdf](http://www.arb.ca.gov/lists/com-attach/60-lcfs-wkshp-jul22-ws-UzBVPFY6WWcFZIM9.pdf)

Original File Name: Comments - Potential Changes to LCFS - 08082022.pdf

Date and Time Comment Was Submitted: 2022-08-08 13:23:42

No Duplicates.

**Comment 54 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Graham  
Last Name: Noyes  
Email Address: graham@noyeslawcorp.com  
Affiliation: NLC for Fulcrum BioEnergy

Subject: Fulcrum BioEnergy Comment RE: LCFS Rulemaking  
Comment:

Dear Clerk of the  
Board

Attached please find the comments of Fulcrum BioEnergy regarding the LCFS rulemaking. Fulcrum requests that CARB evaluate the benefits of authorizing the sourcing by low carbon fuel production facilities of Low-CI Power via firm power purchase agreement. This strategy aligns with California's goal to replace fossil fuels with zero carbon liquid fuels for transportation by 2045, and avoids creating more demand for fossil-based energy.

Fulcrum's complete comment is attached.

Please contact me if there are any issues with the transmission, or for any discussions relating to these comments. Fulcrum appreciates the opportunity to provide comments to CARB regarding the LCFS regulatory program.

Best Regards,  
Graham Noyes  
Noyes Law Corporation for Fulcrum  
BioEnergy  
[www.fuelandcarbonlaw.com](http://www.fuelandcarbonlaw.com)

Attachment: [www.arb.ca.gov/lists/com-attach/61-lcfs-wkshp-jul22-ws-UWZTCIc3UnQDYlAl.pdf](http://www.arb.ca.gov/lists/com-attach/61-lcfs-wkshp-jul22-ws-UWZTCIc3UnQDYlAl.pdf)

Original File Name: 7 August 2022 Fulcrum LCFS Comment RE Low CI Power FINAL.pdf

Date and Time Comment Was Submitted: 2022-08-08 13:40:42

No Duplicates.

**Comment 55 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Chris

Last Name: Bliley

Email Address: cbliley@growthenergy.org

Affiliation: Growth Energy

Subject: Growth Energy Comments

Comment:

Please see the attached comment from Growth Energy, the world's largest association of biofuel producers.

Attachment: [www.arb.ca.gov/lists/com-attach/62-lcfs-wkshp-jul22-ws-UzBTNAZ1VWRRCAbs.pdf](http://www.arb.ca.gov/lists/com-attach/62-lcfs-wkshp-jul22-ws-UzBTNAZ1VWRRCAbs.pdf)

Original File Name: CARB\_LCFSWorkshop08082022Final.pdf

Date and Time Comment Was Submitted: 2022-08-08 13:47:26

No Duplicates.

**Comment 56 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Sam

Last Name: Lehr

Email Address: sam.lehr@rngcoalition.com

Affiliation: Coalition for Renewable Natural Gas

Subject: RNG Coalition Comments on LCFS Workshop

Comment:

Hello,

Please see attached comments from RNG Coalition regarding CARB's

July 2022 LCFS workshop.

Thank you,

Sam

Attachment: [www.arb.ca.gov/lists/com-attach/64-lcfs-wkshp-jul22-ws-VmRQZAAxUTpWYAU9.pdf](http://www.arb.ca.gov/lists/com-attach/64-lcfs-wkshp-jul22-ws-VmRQZAAxUTpWYAU9.pdf)

Original File Name: 220808 RNG Coalition Comments on LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 13:45:24

No Duplicates.



**Comment 57 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Jeremy

Last Name: Martin

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

Affiliation: Union of Concerned Scientists

Subject: UCS Comments on LCFS workshop

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/65-lcfs-wkshp-jul22-ws-UCUGY1clUV1VMAIm.pdf](http://www.arb.ca.gov/lists/com-attach/65-lcfs-wkshp-jul22-ws-UCUGY1clUV1VMAIm.pdf)

Original File Name: UCS Comments on July 2022 LCFS workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 13:48:46

No Duplicates.

**Comment 58 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Matt

Last Name: Herman

Email Address: mherman@iasoybeans.com

Affiliation: Iowa Soybean Association

Subject: July 2022 Workshop Comments

Comment:

Please find our comments attached. Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/66-lcfs-wkshp-jul22-ws-Bm9UPQZwVGZWDwV2.pdf](http://www.arb.ca.gov/lists/com-attach/66-lcfs-wkshp-jul22-ws-Bm9UPQZwVGZWDwV2.pdf)

Original File Name: Iowa Soybean Association August 2022 - Signed.pdf

Date and Time Comment Was Submitted: 2022-08-08 13:52:57

No Duplicates.

**Comment 59 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Don

Last Name: Gilstrap

Email Address: dgilstrap@chevron.com

Affiliation: Chevron

Subject: Chevron comments on July 7 workshop

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/67-lcfs-wkshp-jul22-ws-AGNcMIYyBCEGcgRr.pdf](http://www.arb.ca.gov/lists/com-attach/67-lcfs-wkshp-jul22-ws-AGNcMIYyBCEGcgRr.pdf)

Original File Name: Chevron Comments on July 7 2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 14:00:20

No Duplicates.

**Comment 60 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Chris

Last Name: Vervaet

Email Address: [chris.vervaet@copacanada.com](mailto:chris.vervaet@copacanada.com)

Affiliation: Canola Council / Canadian Oilseed Processors

Subject: Canola Council of Canada submission

Comment:

Please find detailed submission attached.

Attachment: [www.arb.ca.gov/lists/com-attach/68-lcfs-wkshp-jul22-ws-AWJXMgZkV1tVIARx.zip](http://www.arb.ca.gov/lists/com-attach/68-lcfs-wkshp-jul22-ws-AWJXMgZkV1tVIARx.zip)

Original File Name: CCC submission to July 7 LCFS Workshop.zip

Date and Time Comment Was Submitted: 2022-08-08 13:52:15

No Duplicates.

# **Comment 61 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Graham

Last Name: Noyes

Email Address: graham@lcfccoalition.com

Affiliation: Low Carbon Fuels Coalition

Subject: Low Carbon Fuels Coalition Comment to the LCFS Rulemaking  
Comment:

Dear Clerk of the Board,

The Low Carbon Fuels Coalition (LCFC) appreciates the opportunity to offer comments on the LCFS Workshop of July 7, 2022.

The LCFC is comprised of a diverse set of companies and stakeholders dedicated to decarbonizing the transportation fuels sector by developing and implementing the use of low carbon fuels. The LCFC submits input regarding three issues of importance to the rulemaking:

Increasing Stringency- Accelerating workshops and a rulemaking to update the LCFS carbon intensity targets, both pre-2030 and post-2030 so that targets align with California's long-term climate goals, should be a top priority for the Air Resources board in the immediate future.

Proposed technology

sunset on forklifts- The LCFC encourages ARB to carefully consider any proposals to sunset individual technologies, including the full implications for private investments and possible unintended consequences.

Proposed cap on

crop-based biofuels

The LCFC would also like to emphasize the importance of developing the LCFS program based on established scientific determinations, the best possible models, and regulatory outcomes. This approach is properly designed to yield the most cost-effective carbon intensity reductions for all modes of transportation, and contrasts with designating fuel or feedstock categorization approaches that pick winners and losers.

Our complete comments is attached. Please contact me regarding any problems in transmission or any discussions regarding the comment.

Best Regards,

Graham Noyes

Executive Director

Low Carbon Fuels Coalition

[www.lcfcoalition.com](http://www.lcfcoalition.com)

Attachment: [www.arb.ca.gov/lists/com-attach/69-lcfs-wkshp-jul22-ws-UDxRNFM0UGAHLAhk.pdf](http://www.arb.ca.gov/lists/com-attach/69-lcfs-wkshp-jul22-ws-UDxRNFM0UGAHLAhk.pdf)

Original File Name: LCFC-LCFS Workshop\_comment\_letter-5Aug22.pdf

Date and Time Comment Was Submitted: 2022-08-08 13:59:16

No Duplicates.

## **Comment 62 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Nikita  
Last Name: Pavlenko  
Email Address: n.pavlenko@theicct.org  
Affiliation: ICCT

Subject: International Council on Clean Transportation comments  
Comment:

These attached comments are submitted by the International Council on Clean Transportation (ICCT). The ICCT is an independent nonprofit organization founded to provide unbiased research and technical analysis to environmental regulators. Our mission is to improve the environmental performance and energy efficiency of road, marine, and air transportation, in order to benefit public health and mitigate climate change. We promote best practices and comprehensive solutions to increase vehicle efficiency, increase the sustainability of alternative fuels, reduce pollution from the in-use fleet, and curtail emissions of local air pollutants and greenhouse gases (GHG) from international goods movement.

The ICCT welcomes the opportunity to provide comments on the Air Resources Board's July meeting to discuss potential changes to the Low-Carbon Fuel Standard. We commend the agency for its dedication to assessing its progress towards its climate goals and its willingness to evaluate policy options to meet its targets. The attached comments below offer a number of technical observations and recommendations for ARB to consider as it reviews the contributions of the Low-Carbon Fuel Standard (LCFS) to its broader climate goals.

Attachment: [www.arb.ca.gov/lists/com-attach/70-lcfs-wkshp-jul22-ws-BWZSNVwCUGJWMIBj.pdf](http://www.arb.ca.gov/lists/com-attach/70-lcfs-wkshp-jul22-ws-BWZSNVwCUGJWMIBj.pdf)

Original File Name: CA AB32 Scoping Plan Comments\_0.2\_Clean.pdf

Date and Time Comment Was Submitted: 2022-08-08 14:06:16

No Duplicates.

**Comment 63 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Joseph  
Last Name: Turquie  
Email Address: info@beyond-energy.com  
Affiliation: Beyond Energy

Subject: Comments on July 7, 2022 LCFS Workshop  
Comment:

Please find attached Beyond Energy's comments in response to concepts presented at the workshop held on July 7, 2022. Thank you.  
Joseph Turquie

Attachment: [www.arb.ca.gov/lists/com-attach/71-lcfs-wkshp-jul22-ws-BWdVNgB4U29ROQNn.pdf](http://www.arb.ca.gov/lists/com-attach/71-lcfs-wkshp-jul22-ws-BWdVNgB4U29ROQNn.pdf)

Original File Name: Beyond Energy Comments on 220707 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 14:04:04

No Duplicates.

**Comment 64 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Julia

Last Name: Heidenreich

Email Address: julia.heidenreich@hfsinclair.com

Affiliation: HF Sinclair

Subject: HF Sinclair Comments on 7.7 CARB Workshop

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/73-lcfs-wkshp-jul22-ws-VDxXN1EjVmwGblAz.pdf](http://www.arb.ca.gov/lists/com-attach/73-lcfs-wkshp-jul22-ws-VDxXN1EjVmwGblAz.pdf)

Original File Name: HFSinclair Comment CARB Potential Changes Workshop 07.07.22.pdf

Date and Time Comment Was Submitted: 2022-08-08 14:15:08

No Duplicates.



**Comment 65 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Robert  
Last Name: Coviello  
Email Address: robert.coviello@bunge.com  
Affiliation: Bunge

Subject: Bunge's Comments Regarding Potential Changes to the LCFS  
Comment:

Please find Bunge's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/74-lcfs-wkshp-jul22-ws-AWNRIgdoUWVXNFMM.pdf](http://www.arb.ca.gov/lists/com-attach/74-lcfs-wkshp-jul22-ws-AWNRIgdoUWVXNFMM.pdf)

Original File Name: Bunge Comments RE July 7 Public Workshop RE Potential Changes to the LCFS.pdf

Date and Time Comment Was Submitted: 2022-08-08 14:14:51

No Duplicates.

## **Comment 66 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Sherrie  
Last Name: Merrow  
Email Address: smerrow@ngvamerica.org  
Affiliation: NGVAmerica

Subject: NGVAmerica Comments on the CA LCFS  
Comment:

CARB Chair Randolph:  
Natural Gas Vehicles for America  
(NGVAmerica), the national trade association for the natural gas vehicle industry, respectfully submits the following comments on the need to continue to incentivize the lowest carbon fuels available to the transportation market. As Governor Newsome recently stated to the California Air Resources Board (CARB), more immediate and impactful action is needed to combat climate change in California. NGVAmerica strongly endorses the use of all low carbon renewable fuels now, while zero emission vehicles (ZEV) are being developed. The California Air Resources Board (CARB) has shown that it understands that to promote a cleaner environment effectively and quickly RNG is an essential component of the Low Carbon Fuel Standard (LCFS) program and NGVAmerica appreciates CARB leadership in this.  
Sincerely,  
Sherrie Merrow  
NGVAmerica Director of State  
Government Affairs

Attachment: [www.arb.ca.gov/lists/com-attach/76-lcfs-wkshp-jul22-ws-BmgFZAZxAzFWPVI3.pdf](http://www.arb.ca.gov/lists/com-attach/76-lcfs-wkshp-jul22-ws-BmgFZAZxAzFWPVI3.pdf)

Original File Name: NGVAmerica Comments on the RNG Imperative for the LCFS - Aug 8 2022.pdf

Date and Time Comment Was Submitted: 2022-08-08 14:20:53

No Duplicates.

**Comment 67 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Noah

Last Name: Garcia

Email Address: [ngarcia@aee.net](mailto:ngarcia@aee.net)

Affiliation: Advanced Energy Economy

Subject: Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/77-lcfs-wkshp-jul22-ws-UDFWNV05AAwAZQRl.pdf](http://www.arb.ca.gov/lists/com-attach/77-lcfs-wkshp-jul22-ws-UDFWNV05AAwAZQRl.pdf)

Original File Name: AEE CARB LCFS comments Final.pdf

Date and Time Comment Was Submitted: 2022-08-08 14:42:01

No Duplicates.

**Comment 68 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Sheri  
Last Name: Deal-Tyne  
Email Address: [sheri@psriowa.org](mailto:sheri@psriowa.org)  
Affiliation:

Subject: LCFS impacts Iowans  
Comment:

I am submitting a letter on behalf of a group of Iowa organizations who want to communicate to CARB how the LCFS is impacting, specifically Iowans, as well as others in the Midwest.  
The letter is attached as a pdf. file.  
Thank you very much.

Attachment: [www.arb.ca.gov/lists/com-attach/78-lcfs-wkshp-jul22-ws-VjVTNAZ1BDUAWVAz.pdf](http://www.arb.ca.gov/lists/com-attach/78-lcfs-wkshp-jul22-ws-VjVTNAZ1BDUAWVAz.pdf)

Original File Name: CARB comments\_final with signatories.pdf

Date and Time Comment Was Submitted: 2022-08-08 14:53:11

No Duplicates.

**Comment 69 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Ira

Last Name: Dassa

Email Address: idassa@airlines.org

Affiliation: Airlines for America (A4A)

Subject: Potential Changes to the LCFS Program

Comment:

Attached is A4A's feedback on the July 7 CARB workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/79-lcfs-wkshp-jul22-ws-VDVSYFMzBQkLbgRr.pdf](http://www.arb.ca.gov/lists/com-attach/79-lcfs-wkshp-jul22-ws-VDVSYFMzBQkLbgRr.pdf)

Original File Name: A4A Comments on Potential Changes to the LCFS Program-filed-8-8-2022.pdf

Date and Time Comment Was Submitted: 2022-08-08 14:55:53

No Duplicates.

**Comment 70 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: adam  
Last Name: browning  
Email Address: abrowning@forummobility.com  
Affiliation: Forum Mobility

Subject: Forum Mobility comments to LCFS reform  
Comment:

Many thanks for the opportunity to provide comments to reforming the LCFS.

Attachment: [www.arb.ca.gov/lists/com-attach/80-lcfs-wkshp-jul22-ws-VzFQOVQnUnQCaQVa.pdf](http://www.arb.ca.gov/lists/com-attach/80-lcfs-wkshp-jul22-ws-VzFQOVQnUnQCaQVa.pdf)

Original File Name: Forum Mobility Comments to LCFS workshop 7\_11\_22.pdf

Date and Time Comment Was Submitted: 2022-08-08 14:50:31

No Duplicates.

**Comment 71 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Kayla  
Last Name: Robinson  
Email Address: Kayla@caleec.com  
Affiliation: CR&R Environmental Services

Subject: CR&R Comments on Potential Changes to LCFS  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/81-lcfs-wkshp-jul22-ws-WjZQNVcwV3cAWVQ3.pdf](http://www.arb.ca.gov/lists/com-attach/81-lcfs-wkshp-jul22-ws-WjZQNVcwV3cAWVQ3.pdf)

Original File Name: LCFS CR&R Aug 8.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:06:02

No Duplicates.

**Comment 72 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Leticia  
Last Name: Phillips  
Email Address: leticia@unica.com.br  
Affiliation: UNICA

Subject: July 7 Workshop Feedback  
Comment:

Please see attached UNICA's feedback requested during the July 7, 2022 workshop.  
Thank you,  
Leticia Phillips

Attachment: [www.arb.ca.gov/lists/com-attach/82-lcfs-wkshp-jul22-ws-AmhXJFA9BC4BWFdg.pdf](http://www.arb.ca.gov/lists/com-attach/82-lcfs-wkshp-jul22-ws-AmhXJFA9BC4BWFdg.pdf)

Original File Name: July 7 Workshop - UNICA Feedback.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:02:12

No Duplicates.



**Comment 73 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Oscar  
Last Name: Garcia  
Email Address: oscar.garcia@neste.com  
Affiliation: Neste

Subject: Neste Comments on LCFS Rulemaking Workshop Held On July 7, 2022  
Comment:

Please see attached comment letter. Thank you

Attachment: [www.arb.ca.gov/lists/com-attach/83-lcfs-wkshp-jul22-ws-BWtRMgZ0UHcAYwRb.pdf](http://www.arb.ca.gov/lists/com-attach/83-lcfs-wkshp-jul22-ws-BWtRMgZ0UHcAYwRb.pdf)

Original File Name: Neste\_LCFS Rulemaking Workshop Comments\_August 8 2022.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:09:09

No Duplicates.

**Comment 74 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Patrick

Last Name: Serfass

Email Address: patrick@americanbiogascouncil.org

Affiliation:

Subject: American Biogas Council Comments

Comment:

Attached are comments from the American Biogas Council.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/85-lcfs-wkshp-jul22-ws-VDVWPVczAyJXOFQ3.pdf](http://www.arb.ca.gov/lists/com-attach/85-lcfs-wkshp-jul22-ws-VDVWPVczAyJXOFQ3.pdf)

Original File Name: American Biogas Council Comments to CARB on Potential Changes to the LCFS 8822 FINAL.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:09:24

No Duplicates.

**Comment 75 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: John

Last Name: Duff

Email Address: john@sorghumgrowers.com

Affiliation:

Subject: National Sorghum Producers Comments on the Potential Changes to the LCFS  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/86-lcfs-wkshp-jul22-ws-U2Fda1RnWDIVDFRk.pdf](http://www.arb.ca.gov/lists/com-attach/86-lcfs-wkshp-jul22-ws-U2Fda1RnWDIVDFRk.pdf)

Original File Name: 2022\_08\_08\_LCFS\_jnd.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:12:46

No Duplicates.

**Comment 76 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Vincent

Last Name: Pellecchia

Email Address: vincent.pellecchia@waveipt.com

Affiliation:

Subject: WAVE LCFS Comment Ltr - LCFS Pub Workshop - 07-07-22

Comment:

Attached please find WAVE's comments regarding CARB's LCFS Public Workshop on July 7, 2022.

Thank you for your time and consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/87-lcfs-wkshp-jul22-ws-UiUAZwdwADYAWQFt.pdf](http://www.arb.ca.gov/lists/com-attach/87-lcfs-wkshp-jul22-ws-UiUAZwdwADYAWQFt.pdf)

Original File Name: WAVE LCFS Comment Ltr - LCFS Pub Workshop - 07-07-22 Final.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:15:23

No Duplicates.

**Comment 77 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Cassandra

Last Name: Farrant

Email Address: cfarrant@ampamericas.com

Affiliation: Amp Americas

Subject: Comments on the July 7, 2022, Public Workshop to Potential Changes to the LCFS  
Comment:

Amp America appreciates the opportunity to submit comments in response to the July 7, 2022, Public Workshop to Discuss Potential Changes to the LCFS. Please see our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/88-lcfs-wkshp-jul22-ws-AWBROgd2AAxSOAhr.pdf](http://www.arb.ca.gov/lists/com-attach/88-lcfs-wkshp-jul22-ws-AWBROgd2AAxSOAhr.pdf)

Original File Name: Amp LCFS July 2022 Workshop Comments.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:12:19

No Duplicates.

**Comment 78 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Steve

Last Name: Kloos

Email Address: steven.kloos@aquahydrex.com

Affiliation: AquaHydrex

Subject: AquaHydrex Comments on July 7 LCFS Workshop

Comment:

Please find our comment letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/89-lcfs-wkshp-jul22-ws-WjtQJwN3VWcKZAB5.pdf](http://www.arb.ca.gov/lists/com-attach/89-lcfs-wkshp-jul22-ws-WjtQJwN3VWcKZAB5.pdf)

Original File Name: AquaHydrex Comments on July 7 2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:21:21

No Duplicates.

**Comment 79 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Miles

Last Name: Heller

Email Address: hellermt@airproducts.com

Affiliation: Air Products

Subject: July 7, 2022 LCFS Workshop Comments

Comment:

Thank you for the opportunity to comment. Please find our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/90-lcfs-wkshp-jul22-ws-AmNcM1IhBwtVIwd1.pdf](http://www.arb.ca.gov/lists/com-attach/90-lcfs-wkshp-jul22-ws-AmNcM1IhBwtVIwd1.pdf)

Original File Name: Air Products Comments July 7 2022 LCFS Workshop final draft.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:20:36

No Duplicates.

**Comment 80 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Matthew

Last Name: Rutherford

Email Address: mrutherford@peninsulacleanenergy.com

Affiliation: Peninsula Clean Energy Authority

Subject: Comments of the Joint CCAs on Potential Future Changes to the LCFS Program

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/91-lcfs-wkshp-jul22-ws-AHAAaVIgACcAKwdw.pdf](http://www.arb.ca.gov/lists/com-attach/91-lcfs-wkshp-jul22-ws-AHAAaVIgACcAKwdw.pdf)

Original File Name: Post-workshop Comments of the Joint CCAs on Potential Future Changes to the LCFS Program\_20220808.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:22:48

No Duplicates.



**Comment 81 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Thad  
Last Name: Kurowski  
Email Address: [tkurowski@tesla.com](mailto:tkurowski@tesla.com)  
Affiliation: Tesla

Subject: Tesla Comments On July 7th LCFS Workshop  
Comment:

Thank you for the opportunity to comment on the July 7th workshop. Please see the attached letter.  
Regards,  
Thad Kurowski

Attachment: [www.arb.ca.gov/lists/com-attach/92-lcfs-wkshp-jul22-ws-VGZQZAQ1VD8FMwU9.pdf](http://www.arb.ca.gov/lists/com-attach/92-lcfs-wkshp-jul22-ws-VGZQZAQ1VD8FMwU9.pdf)

Original File Name: 220808 Tesla FINAL LCFS Comments re 7-7 workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 14:56:39

No Duplicates.

**Comment 82 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Laura  
Last Name: Berland-Shane  
Email Address: [laura@blueplanetsystems.com](mailto:laura@blueplanetsystems.com)  
Affiliation: Blue Planet

Subject: Comments on LCFS workshop  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/93-lcfs-wkshp-jul22-ws-UzFVPwF1BDJXDgV1.pdf](http://www.arb.ca.gov/lists/com-attach/93-lcfs-wkshp-jul22-ws-UzFVPwF1BDJXDgV1.pdf)

Original File Name: Blue Planet July 2022 LCFS workshop comments.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:32:24

No Duplicates.

**Comment 83 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Joseph  
Last Name: Turquie  
Email Address: info@beyond-energy.com  
Affiliation:

Subject: Comments on July 7, 2022 LCFS Workshop  
Comment:

Please find attached Beyond Energy's comments in response to the recent Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard. Contact me with questions. Much appreciated.

Attachment: [www.arb.ca.gov/lists/com-attach/94-lcfs-wkshp-jul22-ws-VjQHZFwkVmoCalQw.pdf](http://www.arb.ca.gov/lists/com-attach/94-lcfs-wkshp-jul22-ws-VjQHZFwkVmoCalQw.pdf)

Original File Name: Beyond Energy Comments on 220707 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:19:46

No Duplicates.

**Comment 84 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Alexandra

Last Name: Frumar

Email Address: david@caliberstrat.com

Affiliation: Remora

Subject: Remora Comments on July 7, 2022 LCFS Workshop

Comment:

Please see Remora's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/95-lcfs-wkshp-jul22-ws-BjZWaFF+UzAFOWcp.pdf](http://www.arb.ca.gov/lists/com-attach/95-lcfs-wkshp-jul22-ws-BjZWaFF+UzAFOWcp.pdf)

Original File Name: 08.08.2022 Remora LCFS Workshop Comments.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:40:21

No Duplicates.

**Comment 85 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Michael  
Last Name: Ganny  
Email Address: mganny@wattev.com  
Affiliation: WattEV

Subject: Potential Changes to LCFS Program  
Comment:

Please see attached comments. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/96-lcfs-wkshp-jul22-ws-BnFWMVEkU3RVNIUj.pdf](http://www.arb.ca.gov/lists/com-attach/96-lcfs-wkshp-jul22-ws-BnFWMVEkU3RVNIUj.pdf)

Original File Name: WattEV - CARB Public Comment.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:47:01

No Duplicates.

**Comment 86 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Nora

Last Name: Cohen Brown

Email Address: shayla@caliberstrat.com

Affiliation: Charm Industrial

Subject: Charm's Comments On Public Workshop to Discuss Potential Changes to the LCFS  
Comment:

Please find Charm's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/97-lcfs-wkshp-jul22-ws-BTVWaAYpVTYCPFd5.pdf](http://www.arb.ca.gov/lists/com-attach/97-lcfs-wkshp-jul22-ws-BTVWaAYpVTYCPFd5.pdf)

Original File Name: 08.08.2022 LCF Workshop Comments (1).pdf

Date and Time Comment Was Submitted: 2022-08-08 15:44:47

No Duplicates.

**Comment 87 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Sarah  
Last Name: Deslauriers  
Email Address: sdeslauriers@carollo.com  
Affiliation: CA Association of Sanitation Agencies

Subject: CASA Comments on July 7th Public Workshop: Potential Changes to the LCFS  
Comment:

Hello - The California Association of Sanitation Agencies (CASA) appreciates the opportunity to provide comments on the potential changes to the LCFS program. Please find attached our comments for consideration. Please contact me with any questions at sdeslauriers@carollo.com or at 925-705-6404. We are ready to work closely and collaboratively with you on this critical program while reliably maintaining essential public and emergency services for all communities under all conditions.  
Sincerely, Sarah A. Deslauriers  
CASA  
Climate Change Program Manager

Attachment: [www.arb.ca.gov/lists/com-attach/99-lcfs-wkshp-jul22-ws-UjEBZgFzUWMCWwJh.pdf](http://www.arb.ca.gov/lists/com-attach/99-lcfs-wkshp-jul22-ws-UjEBZgFzUWMCWwJh.pdf)

Original File Name: CASA Comments on LCFS Proposed changes\_FINAL\_0822.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:48:01

No Duplicates.

**Comment 88 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Matt  
Last Name: Haynie  
Email Address: shayla@caliberstrat.com  
Affiliation: POET

Subject: POET's Comments On Public Workshop to Discuss Potential Changes to the LCFS  
Comment:

Please find POET's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/100-lcfs-wkshp-jul22-ws-VzFVOgBvUmAKYAFc.pdf](http://www.arb.ca.gov/lists/com-attach/100-lcfs-wkshp-jul22-ws-VzFVOgBvUmAKYAFc.pdf)

Original File Name: Final 08.08.2022 POET LCFS Workshop Comments.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:51:00

No Duplicates.



**Comment 89 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Evan

Last Name: Neyland

Email Address: [evan.neyland@chargepoint.com](mailto:evan.neyland@chargepoint.com)

Affiliation: ChargePoint

Subject: ChargePoint comment re: Jul 7 2022 LCFS workshop

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/101-lcfs-wkshp-jul22-ws-B2RVO1c3BCUKa1I3.pdf](http://www.arb.ca.gov/lists/com-attach/101-lcfs-wkshp-jul22-ws-B2RVO1c3BCUKa1I3.pdf)

Original File Name: ChargePoint Comments to Jul 7 2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:27:54

No Duplicates.

**Comment 90 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Mark

Last Name: Blakeley

Email Address: mark.blakeley@gladstein.org

Affiliation: Consultant on behalf of Penske.

Subject: Penske Comment Letter on Potential LCFS Changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/102-lcfs-wkshp-jul22-ws-ViZWNVc4VnZRPAdi.pdf](http://www.arb.ca.gov/lists/com-attach/102-lcfs-wkshp-jul22-ws-ViZWNVc4VnZRPAdi.pdf)

Original File Name: Penske Truck Leasing Comment Letter on Potential LCFS Changes.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:55:31

No Duplicates.

**Comment 91 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Ryan  
Last Name: Huggins  
Email Address: rhuggins@pinespire.com  
Affiliation: PineSpire

Subject: PineSpire comments on LCFS Rulemaking Workshop 07.2022  
Comment:

Thank you for consideration of our comments for updates to the  
LCFS rule.

Attachment: [www.arb.ca.gov/lists/com-attach/103-lcfs-wkshp-jul22-ws-WytUO1U6WW8LfgBw.pdf](http://www.arb.ca.gov/lists/com-attach/103-lcfs-wkshp-jul22-ws-WytUO1U6WW8LfgBw.pdf)

Original File Name: PineSpire\_Comments on LCFS Rulemaking Workshop July 2022.pdf

Date and Time Comment Was Submitted: 2022-08-08 15:57:06

No Duplicates.

**Comment 92 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Tod

Last Name: Trauman

Email Address: todd@e-missioncontrol.com

Affiliation: e-Mission Control

Subject: eMC Comments on July Workshop for LCFS Rulemaking

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/104-lcfs-wkshp-jul22-ws-UjcGbVIwBQIRNFQ7.pdf](http://www.arb.ca.gov/lists/com-attach/104-lcfs-wkshp-jul22-ws-UjcGbVIwBQIRNFQ7.pdf)

Original File Name: eMC Comments CA LCFS Rulemaking August 2022.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:06:24

No Duplicates.

**Comment 93 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Maya  
Last Name: Kelty  
Email Address: mkelty@3degreesinc.com  
Affiliation: 3Degrees

Subject: 3Degrees' Comments on Potential Changes to the LCFS  
Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/com-attach/105-lcfs-wkshp-jul22-ws-VGdXNV05ADQFcQVg.pdf](http://www.arb.ca.gov/lists/com-attach/105-lcfs-wkshp-jul22-ws-VGdXNV05ADQFcQVg.pdf)

Original File Name: 3Degrees Comments on LCFS 08082022.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:10:26

No Duplicates.

**Comment 94 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Hossein  
Last Name: Tabatabaie  
Email Address: htabatabaie@iwatani.com  
Affiliation: Director, Product Management

Subject: Iwatani's Comments Regarding the Potential Changes to the Low Carbon Fuel Standard  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/106-lcfs-wkshp-jul22-ws-VD0FdFw8VHMCZQBu.pdf](http://www.arb.ca.gov/lists/com-attach/106-lcfs-wkshp-jul22-ws-VD0FdFw8VHMCZQBu.pdf)

Original File Name: Iwatani Corporation of America\_Final Version.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:10:08

No Duplicates.

**Comment 95 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Evan  
Last Name: Rosenberg  
Email Address: evan.rosenberg@srectrade.com  
Affiliation: SRECTrade, Inc.

Subject: Hold a Workshop on the LCFS Reporting Tool  
Comment:

In coordination with a variety of program stakeholders, SRECTrade and the signatories below respectfully submit the attached comment requesting CARB to hold a pre-rulemaking workshop to solicit feedback on the LCFS Reporting Tool and underlying data management systems.

Alameda Contra Costa Transit District  
APX, Inc.  
Eco Credit Traders LLC  
Elbow River  
e-Mission Control  
EV Connect  
Fedex Ground  
Hartree Partners  
Idemitsu Apollo Corp  
Mercuria  
Optiwatt  
The Pasha Group  
Rail Management Services  
San Diego Metropolitan Transportation System  
City of San Jose  
Sire Trust  
Tulare County Regional Transit Agency  
WattEV  
Sysco Corporation

Attachment: [www.arb.ca.gov/lists/com-attach/107-lcfs-wkshp-jul22-ws-BXZTJwFlADBvJ1Ig.pdf](http://www.arb.ca.gov/lists/com-attach/107-lcfs-wkshp-jul22-ws-BXZTJwFlADBvJ1Ig.pdf)

Original File Name: SRECTrade+Stakeholders\_Letter to CARB\_July 2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:04:37

No Duplicates.

**Comment 96 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Sophie

Last Name: Silvestri

Email Address: sophie\_silvestri@pashanet.com

Affiliation:

Subject: LCFS letter to CARB from Pasha Hawaii

Comment:

Please see attached letter from Pasha Hawaii.

Attachment: [www.arb.ca.gov/lists/com-attach/108-lcfs-wkshp-jul22-ws-UjFTNFwvV2ZSCwUo.pdf](http://www.arb.ca.gov/lists/com-attach/108-lcfs-wkshp-jul22-ws-UjFTNFwvV2ZSCwUo.pdf)

Original File Name: CARB -LCFS for Martime 8.8.2022 FINAL.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:15:51

No Duplicates.



**Comment 97 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Kinshuk

Last Name: Chatterjee

Email Address: kinshuk.chatterjee@energycenter.org

Affiliation: Center for Sustainable Energy (CSE)

Subject: CSE Comments regarding CARB's Public Workshop to Discuss Potential Changes to the LCFS  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/109-lcfs-wkshp-jul22-ws-BjRQZfVvUDsEMldv.pdf](http://www.arb.ca.gov/lists/com-attach/109-lcfs-wkshp-jul22-ws-BjRQZfVvUDsEMldv.pdf)

Original File Name: 220808\_CSE\_Comments re CARB Workshop on Potential Changes to the LCFS\_Final.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:19:55

No Duplicates.

**Comment 98 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Peter

Last Name: Colussy

Email Address: peter.colussy@nexteraenergy.com

Affiliation: NextEra Energy Resources

Subject: NextEra Energy Resources Comments

Comment:

NextEra Energy Resources appreciates the opportunity to provide comments on the proposed changes to the LCFS regulation following the July 7th public workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/110-lcfs-wkshp-jul22-ws-Uz0BYlw1AyQEZwJw.pdf](http://www.arb.ca.gov/lists/com-attach/110-lcfs-wkshp-jul22-ws-Uz0BYlw1AyQEZwJw.pdf)

Original File Name: NextEra LCFS Workshop Comments 080822.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:17:19

No Duplicates.

**Comment 99 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: C.

Last Name: Lee

Email Address: [contact@altaterraenergy.com](mailto:contact@altaterraenergy.com)

Affiliation: AltaTerra Energy LLC

Subject: Comments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/111-lcfs-wkshp-jul22-ws-AWBSOAN2UWMGdFA1.pdf](http://www.arb.ca.gov/lists/com-attach/111-lcfs-wkshp-jul22-ws-AWBSOAN2UWMGdFA1.pdf)

Original File Name: AltaTerra-CARB letter 2022-08-08c.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:28:03

No Duplicates.

**Comment 100 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Brian  
Last Name: Foody  
Email Address: brian.foody@IOGEN.ca  
Affiliation: Iogen

Subject: Iogen Comments on the July 7 LCFS Workshop  
Comment:

Attached are our comment, thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/112-lcfs-wkshp-jul22-ws-U2FdaQMyVzxVYwkx.pdf](http://www.arb.ca.gov/lists/com-attach/112-lcfs-wkshp-jul22-ws-U2FdaQMyVzxVYwkx.pdf)

Original File Name: 220808 Iogen Comments to LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:27:57

No Duplicates.

**Comment 101 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Jim  
Last Name: Verburg  
Email Address: jverburg@wspa.org  
Affiliation: WSPA

Subject: WSPA Comments on CARB Workshop to Discuss Potential Changes to the LCFS  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/113-lcfs-wkshp-jul22-ws-BnEBdFIjADJVDAIq.pdf](http://www.arb.ca.gov/lists/com-attach/113-lcfs-wkshp-jul22-ws-BnEBdFIjADJVDAIq.pdf)

Original File Name: WSPA CA LCFS 07-07-2022 Workshop Comment Letter\_08-08-2022.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:30:14

No Duplicates.

**Comment 102 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Rice

Email Address: nicolerice@cngvc.org

Affiliation: California Natural Gas Vehicle Coalition

Subject: CNGVC Comment Letter on July 7 Workshop

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/114-lcfs-wkshp-jul22-ws-AWIHb1UzV3ILbgNc.pdf](http://www.arb.ca.gov/lists/com-attach/114-lcfs-wkshp-jul22-ws-AWIHb1UzV3ILbgNc.pdf)

Original File Name: CNGVC Comment Letter on July7 LCFS Workshop 080822.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:30:06

No Duplicates.

**Comment 103 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Shayne

Last Name: Petkiewicz

Email Address: shayne.petkiewicz@anaergia.com

Affiliation:

Subject: Anaergia - Comments on LCFS Program Staff Presentation on July 7, 2022

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/115-lcfs-wkshp-jul22-ws-UDFROVU1UGYFcQZh.pdf](http://www.arb.ca.gov/lists/com-attach/115-lcfs-wkshp-jul22-ws-UDFROVU1UGYFcQZh.pdf)

Original File Name: Anaergia CARB LCFS 20220808.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:35:35

No Duplicates.

**Comment 104 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Melicia

Last Name: Charles

Email Address: melicia.charles@mainspringenergy.com

Affiliation: Mainspring Energy, Inc.

Subject: Mainspring Comments on the July 7th LCFS Workshop

Comment:

See attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/116-lcfs-wkshp-jul22-ws-VThWMVQ8Aj8Ddgh4.pdf](http://www.arb.ca.gov/lists/com-attach/116-lcfs-wkshp-jul22-ws-VThWMVQ8Aj8Ddgh4.pdf)

Original File Name: Mainspring Comments on LCFS Staff July 7 Workshop (1).pdf

Date and Time Comment Was Submitted: 2022-08-08 16:35:05

No Duplicates.



**Comment 105 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Melinda

Last Name: Palmer

Email Address: mpalmer@kernoil.com

Affiliation: Kern Oil & Refining Co.

Subject: Comments on Proposed Changes to LCFS

Comment:

Please see attached comment letter from Kern Oil & Refining Co.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/117-lcfs-wkshp-jul22-ws-Vj1UNwFyVmsGXwlm.pdf](http://www.arb.ca.gov/lists/com-attach/117-lcfs-wkshp-jul22-ws-Vj1UNwFyVmsGXwlm.pdf)

Original File Name: Kern Oil Comments on LCFS 8.8.22.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:39:31

No Duplicates.

**Comment 106 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Dean  
Last Name: Taylor  
Email Address: Dean@calETC.com  
Affiliation: Calif Electric Transportation Coalition

Subject: CalETC comments July 7 workshop  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/118-lcfs-wkshp-jul22-ws-VjVVMgRpV2FQIIQ3.pdf](http://www.arb.ca.gov/lists/com-attach/118-lcfs-wkshp-jul22-ws-VjVVMgRpV2FQIIQ3.pdf)

Original File Name: CalETC comments July 7 LCFS workshop vF.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:40:52

No Duplicates.

**Comment 107 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Shannon

Last Name: Broome

Email Address: sbroome@HuntonAK.com

Affiliation: On behalf of HIF USA

Subject: Comments of HIF USA on CARB Workshop re Potential LCFS Changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/119-lcfs-wkshp-jul22-ws-VmQGMAMwBGVXfAk5.pdf](http://www.arb.ca.gov/lists/com-attach/119-lcfs-wkshp-jul22-ws-VmQGMAMwBGVXfAk5.pdf)

Original File Name: 2022-08-08 HIF USA Comments on CARB Workshop on Potential LCFS Changes.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:36:43

No Duplicates.

# **Comment 108 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Noah  
Last Name: Jackson  
Email Address: noah.jackson@yosemiteclean.com  
Affiliation: Yosemite Clean Energy

Subject: Yosemite Clean Comments on LCFS Program Staff Presentation on July 7, 2022  
Comment:

August 8, 2022

Low Carbon Fuels Standard Program  
California Air Resources Board  
Sacramento, CA 95814

Re: Yosemite Clean Comments on LCFS  
Program Staff Presentation on July 7, 2022

To the LCFS Program:

The LCFS plays a critical role in the transition to a zero emission transportation sector in California, and biofuels from forest waste play a critical role in the LCFS. CARB has an opportunity to either assist the state and federal governments in their effort to reduce wildfire risk, or to hinder them, based on the LCFS policies they adopt or abstain from adopting as relates to forest biomass.

## **The Problem**

While it goes without saying, California is in the midst of a crisis of catastrophic proportions. As stated by the U.S. Forest Service (“USFS”), “Wildfires have been growing in size, duration, and destructivity over the past 20 years. Growing wildfire risk is due to accumulating fuels, a warming climate, and expanding development in the wildland-urban interface. The risk has reached crisis proportions in the West, calling for decisive action to protect people and communities and improve forest health and resilience. It will take a paradigm shift in land management across jurisdictional boundaries to reduce risk and restore fire-adapted landscapes.”[1]

In response to the crisis, USFS set a goal to treat 50 million acres over the next 10 years. CARB recently came out in its draft scoping plan stating that the 1 million acre goal set by the Newsom administration and the Forest Service is too small, and California needs to be treating over 2 million acres per year. By conservative estimates, this treatment will generate over 20 million tons of waste biomass per year, which as of now, California has no market for.

## **The Solution**

This waste, which is a byproduct of work essential to saving our forests, could be transformed into carbon negative transportation fuels, including hydrogen, if policy allows for it. This biofuels pathway allows for significant Carbon Capture and Sequestration, and is cited by Lawrence Livermore National Laboratories as a critical component to getting California to carbon neutral.[2] Yosemite Clean Energy (“Yosemite”) and companies like us have the technology and business development solutions to turn California’s forest wood waste into carbon negative biofuels while reducing the risk of wildfire.

Yosemite is a bioenergy development company that

specializes in transforming farm and forest wood waste into carbon negative green hydrogen and renewable natural gas, providing renewable solutions to California's transportation and broader energy sectors while reducing risk of wildfire, raising air quality, and creating jobs and economic stimulus in minority, tribal, and other underserved communities. Yosemite is developing a network of biofuels plants that are locally owned by the agricultural and forest communities they serve. The company is at various stages of development planning on biofuels plants across the state of California, with operations at Yosemite's first plant scheduled for Quarter 1 of 2025. Yosemite's standard plants will utilize 90,000 bone dry tons of wood waste per year to produce an estimated 13 metric tons of green hydrogen and 31 metric tons of RNG per day.

Our Request to CARB

In its initial comments to CARB, Yosemite has two recommendations, included below, followed by description of each and why each was included. Yosemite foresees engaging with CARB on numerous topics throughout the process, but wanted to get on the record today to bring up these two key issues.

Yosemite recommends that:

1. Avoided emissions for Forest Residuals. CARB should develop a robust model within the LCFS to consider avoided emissions for fuels derived from forest wood waste that would otherwise be burned or decompose. Emissions from catastrophic wildfire single-handedly displace all particulate and GHG emissions reductions the state is achieved to date. Capturing avoided emissions in the LCFS will promote private sector contribution to wildfire risk reduction and accurately reflect true CI score of fuels from forest waste.

2. Sustainability criteria for Forest Residuals. CARB should abstain from implementing sustainability criteria for biofuels produced from forest wood waste, just as it has done to date. Adopting sustainability criteria such as that included in AB1122 would significantly complicate woody biomass-to-biofuels projects, and hinder their development.[3] All biomass removed from federal and state managed forests have obtained permits and authorities under Cal Fire and USFS to remove the biomass in question, and each additional government program utilized implements a unique set of requirements. CARB setting additional standards within the LCFS will add one more layer of complexity.

We look forward to additional engagement with CARB on this topics, as well as others.

Sincerely,

Noah Jackson  
Director of Strategic Operations  
Yosemite Clean Energy  
Noah.jackson@yosemiteclean.com  
559-790-5155

[1] U.S. Forest Service, "Confronting the Wildfire Crisis: A Strategy for Protecting Communities and Improving Resilience in America's Forests", January 2022, accessible at: <https://www.fs.usda.gov/sites/default/files/Confronting-Wildfire-Crisis.pdf>

[2] Lawrence Livermore National Laboratory, "Getting to Neutral: Options for Negative Carbon Emissions in California", August 2020, available at

[https://gs.llnl.gov/sites/gs/files/2021-08/getting\\_to\\_neutral.pdf](https://gs.llnl.gov/sites/gs/files/2021-08/getting_to_neutral.pdf).

[3] Public Utilities Code  
section 399.20(f)(2)(A)(iii).

Attachment: [www.arb.ca.gov/lists/com-attach/120-lcfs-wkshp-jul22-ws-VmRda1JhUzIEMldv.docx](http://www.arb.ca.gov/lists/com-attach/120-lcfs-wkshp-jul22-ws-VmRda1JhUzIEMldv.docx)

Original File Name: 20220808 Yosemite Clean Commentson LCFS Program Staff Presentation.docx

Date and Time Comment Was Submitted: 2022-08-08 16:19:41

No Duplicates.

# **Comment 109 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Dr. Robert T.

Last Name: Do

Email Address: Rtdo@sgh2energy.com

Affiliation:

Subject: CARB Workshop Comments SGH2 Energy

Comment:

1. In reference to the slide below:

a. Methane

GWP: According to the UN IPCC latest report as well as the Methane Cap regulations endorsed by 197 countries including the US at COP27, Methane is considered to have a GWP of 86 X CO<sub>2</sub> over the next 20 years. Evaluating Methane global warming potential over the next 20 years is the ONLY way to accurately evaluate the impact of Methane considering the near term objective of the State of CA and of the US to lower CO<sub>2</sub> emissions by 50% in 2030 .

Yet, the CARB uses a GWP of 25 X CO<sub>2</sub> for Methane based on a 100 year impact. This is contradictory to all current scientific notation because Methane dissipate over the twenty year timeframe and create its most harmful impact to the Global warming during the first 20 years, hence it is no universally considered to have a GWP of 85 X CO<sub>2</sub>.

We highly recommend that CARB adopt the same standards as the US Federal Govt and the UN IPCC in this regards to evaluate Methnae GWP over 20 years and not over 100 years.

b. Methane

Avoidance credits: There have been many applications to CARB to accept environmental attributes ( EAs ) from biomethane and use these EAs to convert fuels in the State into carbon negative H<sub>2</sub> using EAs from biomethane created in dairy farms and landfills from other states. This is highly unusual and have created unusually low carbon negative credits in the State of CA while these biomethane are located in other states, and crowding out opportunities for companies generating carbon negative Hydrogen and fuels in CA.

c. BECS:

BioEnergy with Carbon Capture and Sequestration was presented by CEC/CARB to be one of the major tool to reduce CO<sub>2</sub> by using carbon neutral biomass energy with carbon capture and sequestration which will lead to Carbon Negative Hydroen and energy. This should be incentivized with higher LCFS credits as additional costs must be incurred for the CCS on BioEnergy projects.

We recommend that Methane avoidance credits should only be allowed if the biomethane is created or avoided IN STATE inside California in order earn LCFS credits from CARB. We Further recommend clear pathways for BECS and increased LCFS benefits.

2. Book and

Claim: Book and claim has been approved for RECs to use for the production of hydrogen from electrolysis. This allows hydrogen to be produced from non renewable power using grid power

with book and claim. To be consistent, similar book and claim for RECs should also be allowed for the production of Hydrogen from the thermal conversion of biogenic waste and biomass.

3. Carbon Capture and Sequestration: while CCS is a big component of CARB policy, there are tremendous obstacles for CCS to be implemented in CA due to the lack of certified Sequestration sites, nor logistics to facilitate the sequestration of CO2 in the State.

We recommend that CARB fast track several sites for CO2 sequestration in the State and provide clear incentives for the infrastructure and logistics development to facilitate CCS in the State.

Dr.Robert T.Do  
Chief Executive Officer  
SGH2 Energy Global

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-08 16:38:41

No Duplicates.



## **Comment 110 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Greg

Last Name: Karras

Email Address: gkarrasconsulting@gmail.com

Affiliation:

Subject: Initial comment of Stand.Earth and Community Energy reSource

Comment:

Please accept the attached comment recommending that CARB consider revising the Low Carbon Fuel Standard to:

- (1) account for land use emissions from refining "deforestation" crude;
- (2) account for fuel chain emissions from refining imported crude for export of petroleum fuels; and
- (3) prohibit subsidies for infrastructure to refine imported crude for export.

Attachment: [www.arb.ca.gov/lists/com-attach/122-lcfs-wkshp-jul22-ws-UjFSO1wwWWcDYAdp.pdf](http://www.arb.ca.gov/lists/com-attach/122-lcfs-wkshp-jul22-ws-UjFSO1wwWWcDYAdp.pdf)

Original File Name: Comment on 7 Jul 2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:37:12

No Duplicates.

**Comment 111 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Angela

Last Name: Richards

Email Address: arichards@monarchtractor.com

Affiliation: Monarch Tractor

Subject: Monarch Tractor comments on July 7 LCFS workshop

Comment:

Comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/123-lcfs-wkshp-jul22-ws-BWITNlcwBycEXQlq.pdf](http://www.arb.ca.gov/lists/com-attach/123-lcfs-wkshp-jul22-ws-BWITNlcwBycEXQlq.pdf)

Original File Name: LCFS Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:41:49

No Duplicates.

**Comment 112 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Spangler

Email Address: thomas@cleanbayrenewables.com

Affiliation:

Subject: AgLand Renewables Comments on LCFS Workshop

Comment:

See attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/124-lcfs-wkshp-jul22-ws-VTQBYFQ5BTdSOlcz.pdf](http://www.arb.ca.gov/lists/com-attach/124-lcfs-wkshp-jul22-ws-VTQBYFQ5BTdSOlcz.pdf)

Original File Name: AgLand July 2022 LCFS Letter.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:47:04

No Duplicates.

**Comment 113 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Tom

Last Name: Van Heeke

Email Address: tvanheeke@rivian.com

Affiliation: Rivian Automotive, LLC

Subject: Feedback on Potential Changes to the LCFS Regulation

Comment:

Rivian is pleased to submit the attached feedback on potential changes to the LCFS regulation in response to CARB's July 7 workshop on the topic. Please reach out to me with any questions. Rivian looks forward to continued discussions. Tom Van Heeke  
Sr. Policy Advisor

Attachment: [www.arb.ca.gov/lists/com-attach/125-lcfs-wkshp-jul22-ws-AHJRPgZxUmhXMAVr.pdf](http://www.arb.ca.gov/lists/com-attach/125-lcfs-wkshp-jul22-ws-AHJRPgZxUmhXMAVr.pdf)

Original File Name: Rivian\_LCFSUpdateInformalComments\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:46:59

No Duplicates.

**Comment 114 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Andrew

Last Name: Dick

Email Address: andrew.dick@electrifyamerica.com

Affiliation: Electrify America, LLC

Subject: Electrify America comment on Potential Changes to LCFS

Comment:

To Whom It May Concern: Please find attached comment from Electrify America regarding potential changes to the California Low Carbon Fuel Standard program.

Best Regards,

Andrew Dick  
Electrify America, LLC

Attachment: [www.arb.ca.gov/lists/com-attach/126-lcfs-wkshp-jul22-ws-UmAANldkAGEHLAk5.pdf](http://www.arb.ca.gov/lists/com-attach/126-lcfs-wkshp-jul22-ws-UmAANldkAGEHLAk5.pdf)

Original File Name: 2022-08-08 Electrify America Comment on California LCFS Program Final.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:52:25

No Duplicates.

**Comment 115 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Stefan  
Last Name: Unnasch  
Email Address: unnasch@lifecycleassociates.com  
Affiliation: Life Cycle Associates

Subject: Role of Biomass in LCFS  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/127-lcfs-wkshp-jul22-ws-WjYHYIMzWFQHIAZZ.pdf](http://www.arb.ca.gov/lists/com-attach/127-lcfs-wkshp-jul22-ws-WjYHYIMzWFQHIAZZ.pdf)

Original File Name: LCA\_-\_Comments Aug8 LCFS Biomass.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:54:51

No Duplicates.

**Comment 116 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Floyd  
Last Name: Vergara  
Email Address: FVergara@cleanfuels.org  
Affiliation: Clean Fuels Alliance America

Subject: Clean Fuels and CABA Comments on July 7th LCFS Workshop  
Comment:

Please find attached our joint comments for your consideration.  
Thanks.

Attachment: [www.arb.ca.gov/lists/com-attach/128-lcfs-wkshp-jul22-ws-AGNVNV09VmRRCFc0.pdf](http://www.arb.ca.gov/lists/com-attach/128-lcfs-wkshp-jul22-ws-AGNVNV09VmRRCFc0.pdf)

Original File Name: CFAA\_CABA Comments LCFS Concepts\_Veg Oil Cap (FINALv2\_08082022 with Attachment).pdf

Date and Time Comment Was Submitted: 2022-08-08 16:34:29

No Duplicates.

**Comment 117 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Graham

Last Name: Noyes

Email Address: graham@noyeslawcorp.com

Affiliation: NLC for CleanFuture

Subject: CleanFuture Comments RE: LCFS Regulatory Changes

Comment:

Dear Clerk of the Board,  
Attached please find the comments of  
CleanFuture.  
Best Regards,  
Graham Noyes

Attachment: [www.arb.ca.gov/lists/com-attach/129-lcfs-wkshp-jul22-ws-VTZXPV05AjACalAP.pdf](http://www.arb.ca.gov/lists/com-attach/129-lcfs-wkshp-jul22-ws-VTZXPV05AjACalAP.pdf)

Original File Name: Clean Future Comment RE LCFS July 7, 2022 Workshop FINAL.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:55:24

No Duplicates.



**Comment 118 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Vincent  
Last Name: Pellecchia  
Email Address: vincent.pellecchia@waveipt.com  
Affiliation: WAVE

Subject: WAVE Comments on LCFS Workshop  
Comment:

Please find our comment letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/130-lcfs-wkshp-jul22-ws-B3AHYFUiWG5WDwZq.pdf](http://www.arb.ca.gov/lists/com-attach/130-lcfs-wkshp-jul22-ws-B3AHYFUiWG5WDwZq.pdf)

Original File Name: WAVE LCFS Comment Ltr - LCFS Pub Workshop - 7-07-22.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:54:38

No Duplicates.

**Comment 119 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Joshua  
Last Name: Stolaroff  
Email Address: josh@motehydrogen.com  
Affiliation: Mote, Inc.

Subject: Comments on targets for the Low Carbon Fuel Standard  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/131-lcfs-wkshp-jul22-ws-BWkFZIEkUHcLaABBy.pdf](http://www.arb.ca.gov/lists/com-attach/131-lcfs-wkshp-jul22-ws-BWkFZIEkUHcLaABBy.pdf)

Original File Name: Letter to CARB 08-08-2022.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:57:27

No Duplicates.

**Comment 120 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Chad

Last Name: Frahm

Email Address: chad.frahm@brightmark.com

Affiliation: Brightmark

Subject: Comments from Brightmark re July 7 LCFS workshop

Comment:

Please find Brightmark's comments to the July 7th LCFS workshop attached.

Thank you

Attachment: [www.arb.ca.gov/lists/com-attach/132-lcfs-wkshp-jul22-ws-VjRdKVw0UWUFawRw.pdf](http://www.arb.ca.gov/lists/com-attach/132-lcfs-wkshp-jul22-ws-VjRdKVw0UWUFawRw.pdf)

Original File Name: Brightmark Comment to CARB July 7 LCFS Changes Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:17:42

No Duplicates.

**Comment 121 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Ryan

Last Name: Kenny

Email Address: ryan.kenny@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: Clean Energy Comments: LCFS Update

Comment:

Please find attached a letter from Clean Energy commenting on the update to the Low Carbon Fuel Standard. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/133-lcfs-wkshp-jul22-ws-UjEGbARgWGoBaQNc.pdf](http://www.arb.ca.gov/lists/com-attach/133-lcfs-wkshp-jul22-ws-UjEGbARgWGoBaQNc.pdf)

Original File Name: Clean Energy Comment Letter LCFS Update August 2022 FINAL.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:57:47

No Duplicates.

**Comment 122 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Mihaly

Last Name: Wekler

Email Address: mwekler@anewclimate.com

Affiliation: Anew Climate, LLC

Subject: Anew Climate, LLC Comments to the Public Workshop to Discuss Potential Changes to the LCFS  
Comment:

Please find comments with respect to the Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (July 7, 2022) submitted on behalf of Anew Climate, LLC enclosed for consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/134-lcfs-wkshp-jul22-ws-WzdUMQZhACAHXIQj.pdf](http://www.arb.ca.gov/lists/com-attach/134-lcfs-wkshp-jul22-ws-WzdUMQZhACAHXIQj.pdf)

Original File Name: LCFS Workshop 2022jul7 Comments Anew\_v1-2.pdf

Date and Time Comment Was Submitted: 2022-08-08 16:13:15

No Duplicates.

**Comment 123 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Andrew

Last Name: Craig

Email Address: [acraig@calbioenergy.com](mailto:acraig@calbioenergy.com)

Affiliation: Cal Bio

Subject: subject of comment

Comment:

CalBio Comments on July 7 LCFS Workshop

CalBio respectfully submits these comments responding to the call for feedback on the July 7, 2022 LCFS Workshop. We look forward to continued dialogue on these matters.

Thanks,

Andrew Craig

Attachment: [www.arb.ca.gov/lists/com-attach/136-lcfs-wkshp-jul22-ws-VzQAZ1A9VmdQPwlm.pdf](http://www.arb.ca.gov/lists/com-attach/136-lcfs-wkshp-jul22-ws-VzQAZ1A9VmdQPwlm.pdf)

Original File Name: CalBio Comments on July 7 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-15 14:48:33

No Duplicates.

## **Comment 124 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Katelyn

Last Name: Sutter

Email Address: kroedner@edf.org

Affiliation: Environmental Defense Fund EDF

Subject: subject of comment

Comment:

Comments Submitted to CARB LCFS Workshop 7/22/22

The following attached comments are submitted by the Environmental Defense Fund (EDF) for the California Air Resources Board's Potential Future Changes to the Low Carbon Fuel Standard (LCFS) Program. July 7, 2022 public workshop.

Katelyn Roedner Sutter  
Senior Manager, US Climate

Environmental Defense Fund  
Environmental Defense Action Fund

Attachment: [www.arb.ca.gov/lists/com-attach/137-lcfs-wkshp-jul22-ws-AmdRM106WSdSNwdo.pdf](http://www.arb.ca.gov/lists/com-attach/137-lcfs-wkshp-jul22-ws-AmdRM106WSdSNwdo.pdf)

Original File Name: EDF-comments-CARB-LCFS-jul22.pdf

Date and Time Comment Was Submitted: 2022-08-18 16:12:57

No Duplicates.

## **Comment 125 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Sasan  
Last Name: Saadat  
Email Address: ssaadat@earthjustice.org  
Affiliation: Earthjustice

Subject: subject of comment  
Comment:

The following attached comments are submitted by Earthjustice's for the July 7th LCFS workshop.

Sasan Saadat  
(he/him)  
Sr. Research and Policy Analyst  
Earthjustice

Attachment: [www.arb.ca.gov/lists/com-attach/138-lcfs-wkshp-jul22-ws-B2IAZ1UmVHMGaFc9.pdf](http://www.arb.ca.gov/lists/com-attach/138-lcfs-wkshp-jul22-ws-B2IAZ1UmVHMGaFc9.pdf)

Original File Name: Earthjustice-LCFS-72022wrkshp-comments.pdf

Date and Time Comment Was Submitted: 2022-08-18 16:37:03

No Duplicates.



**Comment 126 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: JACK

Last Name: BARROW

Email Address: jack.barrow@btr.energy

Affiliation: Audi, GM, Rivian, and BTR Ener

Subject: subject of comment

Comment:

The following attached comments are submitted by electric vehicle manufacturers Audi, GM, and Rivian along with BTR Energy

JACK BARROW

Chief Executive Officer

BTR Energy

Attachment: [www.arb.ca.gov/lists/com-attach/139-lcfs-wkshp-jul22-ws-VDdSNQYqAzoBaAdu.pdf](http://www.arb.ca.gov/lists/com-attach/139-lcfs-wkshp-jul22-ws-VDdSNQYqAzoBaAdu.pdf)

Original File Name: CA-Joint-LCFS-Comments-Audi-BTR-GM-Rivian-72222.pdf

Date and Time Comment Was Submitted: 2022-08-18 16:37:03

No Duplicates.

**Comment 127 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Jessica  
Last Name: Hoffman  
Email Address: PLundmark@rpmgllc.com  
Affiliation: RPMG

Subject: subject of comment  
Comment:

The following attached comments are submitted by RPMG for the July 7th LCFS workshop.

Jessica W Hoffmann  
RPMG

Attachment: [www.arb.ca.gov/lists/com-attach/140-lcfs-wkshp-jul22-ws-ViQHcVY6AzcKIQhr.pdf](http://www.arb.ca.gov/lists/com-attach/140-lcfs-wkshp-jul22-ws-ViQHcVY6AzcKIQhr.pdf)

Original File Name: RPMG-Comments-72222- LCFS-Workshop.pdf

Date and Time Comment Was Submitted: 2022-08-19 16:48:17

No Duplicates.

**Comment 128 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Gary  
Last Name: Kay  
Email Address: Gary\_Kay@cargill.com  
Affiliation: Cargill

Subject: subject of comment  
Comment:

The following attached comments are submitted by Cargill Inc for the July 7th LCFS workshop.

Gary Kay  
Cargill Inc

Attachment: [www.arb.ca.gov/lists/com-attach/141-lcfs-wkshp-jul22-ws-UDMGYV0uVmJSPQJu.pdf](http://www.arb.ca.gov/lists/com-attach/141-lcfs-wkshp-jul22-ws-UDMGYV0uVmJSPQJu.pdf)

Original File Name: Cargill-comments-to-CARB\_72222.pdf

Date and Time Comment Was Submitted: 2022-08-19 16:50:06

No Duplicates.

## **Comment 129 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Matt

Last Name: Miyasato

Email Address: matt.miyasato@firstelementfuel.com

Affiliation: FirstElement Fuel

Subject: subject of comment

Comment:

The following attached comments are submitted by FirstElement Fuel for the July 7th LCFS workshop.

Matt Miyasato, Ph.D.

Vice President

Strategic Growth & Government Affairs

FirstElement Fuel

Attachment: [www.arb.ca.gov/lists/com-attach/142-lcfs-wkshp-jul22-ws-Wz0BblwvVHQKeAZj.pdf](http://www.arb.ca.gov/lists/com-attach/142-lcfs-wkshp-jul22-ws-Wz0BblwvVHQKeAZj.pdf)

Original File Name: FirstElementFuel\_LCFSworkshop-comments.pdf

Date and Time Comment Was Submitted: 2022-08-19 16:51:50

No Duplicates.

## **Comment 130 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-jul22-ws) - 1st Workshop.**

First Name: Natalie

Last Name: Nax

Email Address: natalie@caleec.com

Affiliation: EVCC

Subject: subject of comment

Comment:

The following attached comments are submitted by the Electric Vehicle Charging Association EVCC for the July 7th LCFS workshop on Potential Changes to the Low Carbon Fuel Standard.

Natalie Nax    She/Her/Hers  
Associate    Environmental & Energy Consulting  
1121 L Street, Suite 309  
Sacramento, CA 95814

Attachment: [www.arb.ca.gov/lists/com-attach/143-lcfs-wkshp-jul22-ws-AWJWMVlhADEGLVA8.pdf](http://www.arb.ca.gov/lists/com-attach/143-lcfs-wkshp-jul22-ws-AWJWMVlhADEGLVA8.pdf)

Original File Name: CARB-LCFS Potential-Changes-8-8-22.pdf

Date and Time Comment Was Submitted: 2022-08-19 16:54:29

No Duplicates.

## **Comment 131 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-Jul22-ws) - 1st Workshop.**

First Name: Colin

Last Name: Murphy

Email Address: cwmurphy@ucdavis.edu

Affiliation: UC Davis UC Davis Policy Institute for E

Subject: subject of comment

Comment:

Comments submitted by Colin Murphy,  
Deputy Director, UC Davis Policy Institute for Energy, Environment  
and the Economy  
Co-Director, UC Davis Low Carbon Fuel Policy Research Initiative

For the July 22nd workshop

Attachment: [www.arb.ca.gov/lists/com-attach/144-lcfs-wkshp-Jul22-ws-VzQFYIIhUGFWDwVp.pdf](http://www.arb.ca.gov/lists/com-attach/144-lcfs-wkshp-Jul22-ws-VzQFYIIhUGFWDwVp.pdf)

Original File Name: CARB\_LCFS\_UCD\_comments\_2022Aug8[53].pdf

Date and Time Comment Was Submitted: 2022-08-31 18:06:17

No Duplicates.

**There are no comments posted to Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-Jul22-ws) that were presented during the Workshop at this time.**