

## **Comment 1 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Andrew

Last Name: Craig

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

Affiliation: California Bioenergy

Subject: CalBio Comments on July 7 LCFS Workshop

Comment:

CalBio is resubmitting its comments originally made during the July 7, 2022 LCFS Workshop.

Thanks,

Andrew Craig

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-lcfs-wkshp-aug18-ws-VDcAZwBtV2ZQP1U6.pdf>

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

Date and Time Comment Was Submitted: 2022-08-18 09:05:50

No Duplicates.

## **Comment 2 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Joshua

Last Name: Kehoe

Email Address: kehoej1@gmail.com

Affiliation: none

Subject: LCFS program changes. And 'ocean tanker' EFs.

Comment:

I am probably doing this wrong, but please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-lcfs-wkshp-aug18-ws-AmFVMgNwBTQHxgl6.docx>

Original File Name: CARB statement Sep 5^LLJ 2022 final.docx

Date and Time Comment Was Submitted: 2022-09-05 21:29:53

No Duplicates.

### **Comment 3 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Bill

Last Name: Wason

Email Address: billwason2@gmail.com

Affiliation: GCarbon USA

Subject: comments on LCFS workshop august 18

Comment:

Attached is a letter detailing comments on the smart agriculture program and other discussions relating to lipid limits on biofuel, carbon reduction goals for 2030 and beyond, food vs. fuel and other items under discussion at CARB. If you have any questions please call the Whats app number above or the office in Indonesia 62 21 5091 8017 and cell 62 821 2231 3367.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-lcfs-wkshp-aug18-ws-B2tUNwRxVXIHZAd1.zip>

Original File Name: Letter to CARB on smart agriculture and other issues, Sept. 12 2022.zip

Date and Time Comment Was Submitted: 2022-09-12 00:13:15

No Duplicates.

## **Comment 4 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: David

Last Name: Mann

Email Address: david.mann@oberonfuels.com

Affiliation: Oberon Fuels

Subject: Comments LCFS Workshop August 18

Comment:

Please find our comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-lcfs-wkshp-aug18-ws-VjkGYgdjUnMGbwNt.pdf>

Original File Name: Oberon Fuels Comments on CARB LCFS Workshop August 18 2022.pdf

Date and Time Comment Was Submitted: 2022-09-13 12:32:51

No Duplicates.

**Comment 5 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Mikhael

Last Name: Skvarla

Email Address: mikhael\_skvarla@gualcogroup.com

Affiliation:

Subject: HD HRI Coalition Letter

Comment:

Let us know if there are any questions.

Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-lcfs-wkshp-aug18-ws-AmhVJIM+VnwHLABh.pdf>

Original File Name: July-August 2022 LCFS Workshop - HD HRI Coalition Comments - Final.pdf

Date and Time Comment Was Submitted: 2022-09-13 15:15:28

No Duplicates.

## **Comment 6 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Kyle

Last Name: Whatley

Email Address: kyle.whatley@sdmts.com

Affiliation: San Diego Metropolitan Transit System

Subject: Potential Changes to the Low Carbon Fuel Standard

Comment:

Attached is MTS's official comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-lcfs-wkshp-aug18-ws-VyRSNV0yBwtQMIA5.pdf>

Original File Name: San Diego MTS - LCSF Program Comments.pdf

Date and Time Comment Was Submitted: 2022-09-15 09:45:10

No Duplicates.

## **Comment 7 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Paul  
Last Name: Bostrom  
Email Address: pbostro@bart.gov  
Affiliation: BART

Subject: BART Comments on 8/18 LCFS Public Workshop  
Comment:

CARB Staff,  
Please find enclosed BART's comments on the 8/18 LCFS Public Workshop hosted by CARB. Thank you for your consideration.

With regards,  
Paul Bostrom  
Acting Group Manager, Sustainability  
San Francisco Bay Area Rapid Transit District (BART)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-lcfs-wkshp-aug18-ws-VzVVMgNwVnEGXwJu.pdf>

Original File Name: BART\_LCFS Public Workshop Comments\_Sept-22\_vF.pdf

Date and Time Comment Was Submitted: 2022-09-15 15:39:42

No Duplicates.

**Comment 8 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: John

Last Name: Duff

Email Address: john@sorghumgrowers.com

Affiliation: National Sorghum Producers

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

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-lcfs-wkshp-aug18-ws-VmRUYldkA2JXDIRk.pdf>

Original File Name: 2022\_09\_15\_LCFS\_jnd.pdf

Date and Time Comment Was Submitted: 2022-09-15 21:13:58

No Duplicates.



**Comment 9 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Ira

Last Name: Dassa

Email Address: idassa@alderfuels.com

Affiliation: Alder Fuels

Subject: Comments on August 18 Workshop

Comment:

Please see the attached for Alder Fuels' comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-lcfs-wkshp-aug18-ws-VDUGbFM2V2FRJQVa.pdf>

Original File Name: Alder Fuels Comments-August 18 LCFS Workshop-9-16-22 FINAL.pdf

Date and Time Comment Was Submitted: 2022-09-16 13:09:22

No Duplicates.

## **Comment 10 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: OBrien

Email Address: rebeccaobrien@tnrenewableenergy.com

Affiliation: TNRE

Subject: TNRE Comments Low Carbon Fuel Standard August 18 Workshop

Comment:

Attached are TNRE's Comments on the Low Carbon Fuel Standard August 18 Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-lcfs-wkshp-aug18-ws-UCQBavQnU2VXDgdr.pdf>

Original File Name: TNRE LCFS Aug 18 Workshop Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-09-16 15:51:45

No Duplicates.

## **Comment 11 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

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

Subject: H Cycle Comments on LCFS Program Staff Presentation on August 18, 2022  
Comment:

Attached you will find H Cycle LLC's 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. We believe the following recommendations will benefit both the LCFS Program and California's emerging low-carbon hydrogen sector.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-lcfs-wkshp-aug18-ws-AmFUMwBzV2YDWlAj.pdf>

Original File Name: CARB Staff Presentation\_H Cycle Comment\_091622.pdf

Date and Time Comment Was Submitted: 2022-09-16 16:13:02

No Duplicates.

**Comment 12 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Sam

Last Name: Wade

Email Address: sam@rngcoalition.com

Affiliation:

Subject: Coalition for Renewable Natural Gas

Comment:

Please see our attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-lcfs-wkshp-aug18-ws-VmRRZVBhUDoLPAI6.pdf>

Original File Name: 220918 RNG Coalition Comments on Aug LCFS Workshop .pdf

Date and Time Comment Was Submitted: 2022-09-18 11:39:13

No Duplicates.

## **Comment 13 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Steven

Last Name: Kloos

Email Address: steven.kloos@aquahydrex.com

Affiliation: AquaHydrex

Subject: AquaHydrex comments on 8/18 workshop

Comment:

Please find our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-lcfs-wkshp-aug18-ws-AmMBdgdzBzUHaQN6.pdf>

Original File Name: AquaHydrex Comments on August 18 2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-09-18 16:44:34

No Duplicates.

**Comment 14 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: David  
Last Name: Mann  
Email Address: david.mann@oberonfuels.com  
Affiliation: Oberon Fuels

Subject: Comments LCFS Workshop August 18  
Comment:

Comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-lcfs-wkshp-aug18-ws-AG9XM1M3VncCa1Q6.pdf>

Original File Name: Oberon Fuels Comments on CARB LCFS Workshop August 18 2022.pdf

Date and Time Comment Was Submitted: 2022-09-19 07:12:47

No Duplicates.

## **Comment 15 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Jame

Last Name: Donath

Email Address: jame@greenscapefinancial.com

Affiliation: Greenscape Financial Group Inc.

Subject: Feedback on Proposed Elimination of Electric Forklift FSEs

Comment:

I wish to provide comment on the recent proposal by CARB to phase out the LCFS credit eligibility of electric forklifts post-2025.

Our company, Greenscape Financial, is in the business of aggregating, monetizing, and financing the credits generated by electric industrial equipment, including electric forklifts. Our business provides owner/operators of electric equipment upfront lump-sum cash payments in exchange for the right to register the credits generated from electric charging of this equipment over a multi-year period. The customers can use those upfront proceeds for any corporate purpose, including purchasing more electric equipment. Our upfront payments are effectively a financial rebate on the purchase or lease of new electric cargo handling equipment, which eases the customer's transition away from higher carbon propane lifts towards the typically more expensive zero-emission vehicles.

We formed our company in 2021 based on CARB's publicly stated commitment to the LCFS regulation. On that basis, my partner and I have made significant investments for the long-term which we believe we benefit our customers, service providers, and local communities. Unfortunately, that whole model has now been thrown into disarray as a result of CARB's recent pronouncements. As we stand today, we are not able to offer customers contracts beyond three years given the complete lack of visibility in regards to the potential for credit generation. Our customers are similarly hesitant to sign up for contracts to participate in a program that now appears to lack long-term support from California regulators.

Recent data shows that only 50-55% of California's forklift fleet is electric, leaving a huge swath of the market (~50,000 forklifts) that still run on propane and must be converted. So why pull the rug out now, particularly when this program has proven so effective to date? The decision seems rather arbitrary and more aimed at addressing low LCFS credit prices than the efficacy of a program that continues to yield results. If CARB is concerned about excess credit generation swamping the LCFS market, a much more logical solution would be to raise the stringency requirements on carbon intensity levels as it has done historically.

We would also suggest that all FSEs be required to install meters that produce empirical data, rather than the "guesstimation" method allowed by CARB and currently used by most vendors of electrical forklift credits. Market observers estimate that this method of credit calculation probably overstates credit generation by as much as 20-30% annually. Mandating metering of electric forklift credits would therefore significantly reduce the pool of credits generated from this category while preserving the integrity of the program.

We strongly encourage CARB not to interfere with a program that has been a model of public/private partnership and has produced results

that are additive to the objectives of the LCFS. At the very least, CARB needs to provide a longer-term transition period (e.g. ~10 years) for a change of this magnitude, with plenty of runway and visibility for market participants. Otherwise we fear the disruption and uncertainty created by such a precipitous move will be felt well beyond the forklift space, and will ultimately prove counterproductive to CARB's oft-stated objective of attracting and retaining private investment to facilitate California's transition to green energy.

Thank you for your attention to this matter.

Jame Donath  
Chairman  
Greenscape Financial Group, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-09-19 07:10:06

No Duplicates.



## **Comment 16 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Matt

Last Name: Amick

Email Address: Mamick@mosoy.org

Affiliation: Missouri Soybean Association

Subject: Missouri Soybean Association Comments - CARB LCFS Workshop

Comment:

To whom it may concern:

Please see attached comments from the Missouri Soybean Association (MSA) addressing life-cycle analysis updates for soy-based biodiesel and renewable diesel. MSA represents over 35,000 Missouri soybean farmers.

We appreciate the opportunity to submit comments and thank you for your consideration of our views on this important topic.

Missouri Soybean Association

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-lcfs-wkshp-aug18-ws-WjdSPVUnAyMCawl8.pdf>

Original File Name: Missouri Soybean Association Comments - CARB LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-09-19 07:59:27

No Duplicates.

**Comment 17 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Julia

Last Name: Levin

Email Address: jlevin@bioenergyca.org

Affiliation: Bioenergy Association of California

Subject: BAC Comments on Aug2022 LCFS Workshop

Comment:

BAC Comments on August 18 Staff Workshop - Proposed Changes to the LCFS program

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-lcfs-wkshp-aug18-ws-VTcFYIEzUV1QNQZp.pdf>

Original File Name: BAC Comments on Aug2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-09-19 08:23:47

No Duplicates.

**Comment 18 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Mark

Last Name: Stoermann

Email Address: mstoerm@newtrient.com

Affiliation: Newtrient LLC

Subject: Newtrient Comments to CARB August 18th LCFS Workshop

Comment:

Newtrient LLC respectfully offers the attached comments to the California Air Resources Board (CARB) in response to the CARB August 18th, 2nd Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-lcfs-wkshp-aug18-ws-WzVRMl0rVHMKfgJr.pdf>

Original File Name: Newtrient Comments Regarding CARB August 18th 2nd Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard.pdf

Date and Time Comment Was Submitted: 2022-09-19 08:42:55

No Duplicates.

## **Comment 19 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-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 the attached comments on potential changes to the LCFS Program submitted by the Global Cold Chain Alliance.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-lcfs-wkshp-aug18-ws-AWZQNVEzADJVDFQ4.pdf>

Original File Name: GCCA LCFS Comments Sept 19th - FINAL.pdf

Date and Time Comment Was Submitted: 2022-09-19 09:04:50

No Duplicates.

## **Comment 20 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Dr.Robert T.  
Last Name: Do  
Email Address: Rtdo@sgh2energy.com  
Affiliation:

Subject: Comments to the LCFS  
Comment:

September 19, 2022  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
Rajinder Sahota  
Deputy Executive Officer, Climate Change and Research

Reference: August 18, 2022 LCFS Workshop

Dear Ms.Sahota,

In addition to the attached Letter from SGH2 Energy Global Corp summarizing our comments to the CARB's latest workshop on potential changes to the LCFS, we are also attaching a Description of our Lancaster Clean H2 Production plant as submitted to the State of CA and the Public for comments prior to CEQA and CUP approval scheduled for November 21st, 2022.

The Technology to be deployed for the Lancaster Project is the SPEG technology system which is "Thermal Conversion" of biogenic organic waste into renewable carbon negative Hydrogen. This technology is described in more details in the attached document which was taken from the CEQA official document prepared by the City of Lancaster.

As part of the CARB's consideration of a new Tier 1 Pathway for Low CI Hydrogen, we are submitting this Technology to be considered for inclusion in the new Tier 1 low CI H2 pathways. Alternatively, we will also submit this as an application for a Tier 2 Pathway for Low CI Hydrogen production. As noted in the attachment, the Lancaster Project is a near term commercial industrial production plant to be approved for CEQA and CUP this year and will start delivering 4,500,000 Kg of Clean H2 per year to HRS in California operated by Shell and Iwatani/Chevron by early 2024.

As a major producer of Clean Hydrogen for California 's HRS, the Lancaster project was also awarded a \$ 3 Million grant from the CEC, we request that the Pathway for Thermal Conversion of Biogenic waste and biomass to Clean carbon negative Hydrogen be officially considered and approved as part of the new "Tier 1 pathways for Low CI Hydrogen" or the existing Tier 2 pathway production for Clean Hydrogen.

Respectfully,  
Dr.Robert T.Do  
Chief Executive Officer  
SGH2 Energy Global Corp

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-lcfs-wkshp-aug18-ws->

VCcCY1E4VDUAWQVg.zip

Original File Name: SGH2 Energy Comments .zip

Date and Time Comment Was Submitted: 2022-09-19 09:12:47

No Duplicates.

## **Comment 21 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Gary

Last Name: Hughes

Email Address: garyhughes.bfw@gmail.com

Affiliation: Biofuelwatch

Subject: The Imperative of Moving Beyond Bioenergy

Comment:

Please see the attached letter as comment on the Aug 18 workshop on upcoming changes to the LCFS, thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-lcfs-wkshp-aug18-ws-WjhUOwNtVWAEdwdi.pdf>

Original File Name: Biofuelwatch\_Aug18LCFSWorkshop.pdf

Date and Time Comment Was Submitted: 2022-09-19 08:47:21

No Duplicates.

## **Comment 22 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-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 8.18.2022

Comment:

Please see SCT comments attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-lcfs-wkshp-aug18-ws-B3QGY1YjBQkDZgZp.pdf>

Original File Name: SCT Comments to CARB LCFS - eTRUs Credit Generation - Final signed.pdf

Date and Time Comment Was Submitted: 2022-09-19 10:01:16

No Duplicates.



**Comment 23 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Applegate

Email Address: michelle.applegate@projectcanary.com

Affiliation: Project Canary

Subject: Project Canary Comments Re Public Workshop on Changes to the LCFS  
Comment:

Project Canary submits the attached comments in response to the Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-lcfs-wkshp-aug18-ws-AnIAdFM9Vm8CYQNg.pdf>

Original File Name: Project Canary Comments CARB LCFS.pdf

Date and Time Comment Was Submitted: 2022-09-19 11:21:56

No Duplicates.

**Comment 24 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Kent  
Last Name: Hartwig  
Email Address: khartwig@gevo.com  
Affiliation:

Subject: Gevo LCFS Workshop Comments 9/19/2022  
Comment:

Attached, Please find comments related to the August 18, 2022  
Public Workshop to Discuss Potential Changes to the Low Carbon Fuel  
Standard.

Respectfully,  
Kent Hartwig  
Director of State Government Affairs  
Gevo, Inc.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-lcfs-wkshp-aug18-ws-UzQGZVYhUm5VDANv.pdf>

Original File Name: Gevo LCFS Comments 09192022 Final.pdf

Date and Time Comment Was Submitted: 2022-09-19 11:29:19

No Duplicates.

**Comment 25 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: JuliAnne

Last Name: Thomas

Email Address: julianne.thomas@ravensr.com

Affiliation:

Subject: Raven SR Comments on LCFS Workshop 8/18/22

Comment:

Please accept the attached comments from Raven SR on the LCFS Workshop, August 18, 2022.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-lcfs-wkshp-aug18-ws-AXNdOIMkVWMLY1QL.pdf>

Original File Name: Raven SR - LCFS Comments to CARB 09.18.2022.pdf

Date and Time Comment Was Submitted: 2022-09-19 11:41:46

No Duplicates.

**Comment 26 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Evan

Last Name: Neyland

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

Affiliation: ChargePoint

Subject: August 18 Workshop Comments - ChargePoint

Comment:

ChargePoint thanks the CARB team for taking the time to review our feedback to the August 18th Workshop.

We look forward to engaging in future opportunities.

Best,  
Evan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-lcfs-wkshp-aug18-ws-AmFQN1MNUG8AZVQy.docx>

Original File Name: CA LCFS Aug 18 Comments\_Final.docx

Date and Time Comment Was Submitted: 2022-09-19 12:12:58

No Duplicates.

**Comment 27 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

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

Subject: WSPA Comments on August 18 2022 LCFS Workshop  
Comment:

Dr. Laskowski,

We are pleased to provide comments on the proposed rule changes outlined in the August 18th, 2022 workshop. Please contact me if you have any questions.

~Jim Verburg  
WSPA

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-lcfs-wkshp-aug18-ws-Wi1SJ10sVWcDWgNg.pdf>

Original File Name: WSPA CA LCFS 08-18-2022 Workshop Comment Letter\_9-19-2022.pdf

Date and Time Comment Was Submitted: 2022-09-19 12:01:53

No Duplicates.

**Comment 28 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

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

Subject: Prologis Comments on 2nd Public Workshop to Discuss Potential Changes to the LCFS  
Comment:

Comments attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-lcfs-wkshp-aug18-ws-VycFcV0zVGsLYghv.pdf>

Original File Name: Prologis\_LCFS comments\_9.19.22.pdf

Date and Time Comment Was Submitted: 2022-09-19 12:42:59

No Duplicates.

**Comment 29 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

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

Subject: NCGA Comments on the August 18 LCFS Workshop  
Comment:

Attached please find our comments. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-lcfs-wkshp-aug18-ws-VDhVMFcwAiEXQRz.pdf>

Original File Name: LCFS Workshop Comments\_National Corn Growers Association\_Sept 19 2022.pdf

Date and Time Comment Was Submitted: 2022-09-19 12:48:08

No Duplicates.

**Comment 30 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Kristin  
Last Name: Henningson  
Email Address: kristin.henningson@valero.com  
Affiliation:

Subject: LCFS Workshop Comments  
Comment:

See attached for comments to the LCFS Workshop, held on 8/18/2022.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-lcfs-wkshp-aug18-ws-AjBWYAQ3VjcKIQEx.pdf>

Original File Name: 2022-09 Valero LCFS Amendment Comments FINAL.pdf

Date and Time Comment Was Submitted: 2022-09-19 12:50:11

No Duplicates.



**Comment 31 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Rina

Last Name: Singh

Email Address: Rina@AltFuelChem.org

Affiliation: Alternative Fuels & Chemicals Coalition

Subject: Workshop Requested for LCFS Biomass & Carbon Neutral Forest Residuals as Potential Changes  
Comment:

Request for LCFS Workshop on Biomass & Carbon-Neutral Forest  
Residuals as Potential Changes to the Low Carbon Fuel Standard.

Feedback to LCFS workshop, requesting changes to the Low Carbon  
Fuel Standard.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-lcfs-wkshp-aug18-ws-AmMGZlQ2UWEBWfc0.pdf>

Original File Name: AFCC Comments to CARB Potential Changes to the Low Carbon Fuel Standard Sept 19 2022.pdf

Date and Time Comment Was Submitted: 2022-09-19 13:09:43

No Duplicates.

**Comment 32 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

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

Subject: Neste Comments on August 18 LCFS Rulemaking Workshop  
Comment:

Neste is pleased to submit the attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-lcfs-wkshp-aug18-ws-AG5TMFAiU3QKaVMM.pdf>

Original File Name: Neste\_August 18 LCFS Rulemaking Workshop Comments\_Sept 19 2022.pdf

Date and Time Comment Was Submitted: 2022-09-19 13:25:41

No Duplicates.

## **Comment 33 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Kirk

Last Name: Merritt

Email Address: kmerritt@soyohio.org

Affiliation: Ohio Soybean Association

Subject: Comments on Public Workshop on Potential Changes to Low Carbon Fuel Standard

Comment:

Thank you for the opportunity to submit comments, please see the letter from Ohio Soybean Association President Patrick Knouff attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-lcfs-wkshp-aug18-ws-WzRVIARkV1tVPwRh.pdf>

Original File Name: OSA Letter to CARB LCFS Sept 2022.pdf

Date and Time Comment Was Submitted: 2022-09-19 13:32:05

No Duplicates.

**Comment 34 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Patrick

Last Name: Serfass

Email Address: info@americanbiogascouncil.org

Affiliation:

Subject: American Biogas Council Comments Regarding Potential Changes to the California LCFS  
Comment:

Attached please find comments from the American Biogas Council.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-lcfs-wkshp-aug18-ws-BWRUPwZiUHEKZVQ3.pdf>

Original File Name: American Biogas Council Comments to CARB Sept 19 2022.pdf

Date and Time Comment Was Submitted: 2022-09-19 13:36:01

No Duplicates.

**Comment 35 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Miles

Last Name: Heller

Email Address: HELLERMT@AIRPRODUCTS.COM

Affiliation: Air Products

Subject: August 18th LCFS Workshop Comments

Comment:

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

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-lcfs-wkshp-aug18-ws-UzJUO1wvBQkHcVAi.pdf>

Original File Name: Air Products Comments August 18 2022 LCFS Workshop final draft.pdf

Date and Time Comment Was Submitted: 2022-09-19 13:50:56

No Duplicates.

**Comment 36 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Chris  
Last Name: Bliley  
Email Address: cbliley@growthenergy.org  
Affiliation: Growth Energy

Subject: Growth Energy LCFS Workshop Comment  
Comment:

Please see the attached further comment from Growth Energy.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-lcfs-wkshp-aug18-ws-VDdUM1IhWWgKUwZq.pdf>

Original File Name: CARB\_LCFSWorkshop09162022\_Final.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:02:13

No Duplicates.

**Comment 37 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

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

Subject: Deere Comments on August 18th Workshop  
Comment:

Please find our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-lcfs-wkshp-aug18-ws-AjBRZwQ3UjMFXAc3.pdf>

Original File Name: 2022\_09\_DeereLCFS.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:07:36

No Duplicates.

**Comment 38 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Thomas  
Last Name: Jeleni&#263;  
Email Address: tjelenic@pmsaship.com  
Affiliation: PMSA

Subject: PMSA Comments on August 2022 Workshop to Discuss Changes to LCFS  
Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-lcfs-wkshp-aug18-ws-BnZSOQFzVGYGXwhr.pdf>

Original File Name: PMSA Comments on 2nd LCFS Workshop 09192022.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:10:04

No Duplicates.



**Comment 39 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Elaine  
Last Name: O'Byrne  
Email Address: elaine@e-missioncontrol.com  
Affiliation: e-Mission Control

Subject: e-Mission Control Comments on Potential Changes to the LCFS  
Comment:

Please find our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-lcfs-wkshp-aug18-ws-AGUCaQNhAw8FYFQ7.pdf>

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

Date and Time Comment Was Submitted: 2022-09-19 14:20:06

No Duplicates.

**Comment 40 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

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

Subject: Chevron comments  
Comment:

see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-lcfs-wkshp-aug18-ws-VjVSPFE1V3IHcwRr.pdf>

Original File Name: Chevron Comments on Aug 18 Workshop.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:28:29

No Duplicates.

**Comment 41 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Elaine  
Last Name: O'Byrne  
Email Address: elaine@e-missioncontrol.com  
Affiliation: e-Mission Control

Subject: e-Mission Control Comments on Potential Changes to the LCFS  
Comment:

Please find our comment letter attached. Thank you.

Attachment:

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

Date and Time Comment Was Submitted: 2022-09-19 14:30:18

No Duplicates.

**Comment 42 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Anthony

Last Name: Harrison

Email Address: anthony@terawattinfrastructure.com

Affiliation: TeraWatt Infrastructure

Subject: TeraWatt's Comments on Electricity Verification for EV Charging  
Comment:

Please find the attached comments of TeraWatt Infrastructure in response to the August 18, 2022 workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-lcfs-wkshp-aug18-ws-BnJWNVUmV2UKewNi.pdf>

Original File Name: TeraWatt LCFS Verification Comments\_09152022.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:25:53

No Duplicates.

## **Comment 43 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Graham  
Last Name: Noyes  
Email Address: graham@noyeslawcorp.com  
Affiliation: Noyes Law Corporation

Subject: LCFS Workshop Comment for Loci Controls Inc. RE: Reducing Landfill Gas Emissions  
Comment:

Dear Dr. Laskowski,

On behalf of Loci Controls, Inc. ("Loci"), I am writing to recommend that due to the urgent necessity of achieving short-lived climate pollutant ("SLCP") emission reductions, the California Air Resources Board ("CARB") should recognize a new methodology to reduce methane emissions from large landfills within CARB's life cycle analysis ("LCA") modeling for the Low Carbon Fuel Standard program ("LCFS"). The specific methodology recommended here has been fully approved by the American Carbon Registry ("ACR"). It is referenced as the "Methodology for the Quantification Monitoring, Reporting and Verification of Greenhouse Gas Emission Reductions and Removals from Landfill Gas Destruction and Beneficial Use Projects, version 2.0." (hereafter the "ACR LFG Methodology"). CARB's direct integration of the ACR LFG Methodology into the LCFS, or CARB's development of an analogue in the LCFS to the ACR LFG Methodology will spur the use of innovative SLCP technologies that can be broadly implemented and thereby provide substantial additional reductions of SLCP emissions. Thus this recommended integration is fully aligned with CARB's priorities, and is replicable at multiple landfills across California and the United States.

The complete comment with the ACR methodology and data is attached.  
Please contact me for any questions or follow-up.

Best Regards,

Graham Noyes  
Noyes Law Corporation for Loci Controls, Inc.  
fuelandcarbonlaw.com

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-lcfs-wkshp-aug18-ws-AGwCawZkVG4LUghr.pdf>

Original File Name: Loci Controls CARB LCFS Comment 19 Sept 2022- Final-combined.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:40:44

No Duplicates.

**Comment 44 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Andrew

Last Name: Craig

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

Affiliation: California Bioenergy

Subject: CalBio Comments on Aug 18th LCFS Workshop

Comment:

Dear CARB, please see CalBio's comments on the August 18th, 2022 LCFS Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-lcfs-wkshp-aug18-ws-VTZUM1U4UWBXOFM8.pdf>

Original File Name: CalBio Comments 08-2022 LCFS workshop final.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:43:58

No Duplicates.

**Comment 45 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Shayne

Last Name: Petkiewicz

Email Address: shayne.petkiewicz@anaergia.com

Affiliation:

Subject: Anaergia - Comments on LCFS Program presentation on Aug 18

Comment:

See comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-lcfs-wkshp-aug18-ws-UzJTOWBgWW9RJQVi.pdf>

Original File Name: Anaergia CARB LCFS 20220919.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:42:34

No Duplicates.

## **Comment 46 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Graham

Last Name: Noyes

Email Address: graham@noyeslawcorp.com

Affiliation: NLC for Woody Biomass Policy Consortium

Subject: Utilizing the Low Carbon Fuel Standard to Reduce the Risk of Catastrophic Wildfire

Comment:

Dear Chair Randolph and Executive Officer Cliff,

We are writing to request that the California Air Resources Board (CARB) work together with other California agencies and the federal government in the current Low Carbon Fuel Standard (LCFS) rulemaking to update CARB's life cycle analysis modeling (LCA) to reflect the reductions in greenhouse gas (GHG) that result from the conversion of the woody biomass cleared during forest treatment into low carbon fuels. On a parallel track, we request that CARB update its air quality and health effects models to recognize the severe impacts of recurring and extended wildfires on fire-exposed communities. These updates are critical given the recent massive expansion of GHG and criteria pollutants generated annually by climate change induced California wildfires.

As an exhibit to this letter, we have attached a White Paper for Policy Makers entitled "Turning Wildfire Tinder Into Low Carbon Fuels." This White Paper documents the rapid expansion of California wildfires, provides a comprehensive set of state and federal policy recommendations, and provides technology overviews from the leading companies in the sector.

The complete comment is attached. Please contact me for any questions or follow up. Thank you for your consideration of this input.

Best Regards,

Graham Noyes  
Noyes Law Corporation  
fuelandcarbonlaw.com

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-lcfs-wkshp-aug18-ws-B3MBclEiBDkKZQJs.pdf>

Original File Name: Turning Wildfire Tinder Into Low Carbon Fuels LCFS 19 Sept 2022-FINAL.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:46:05

No Duplicates.



**Comment 47 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Shayne

Last Name: Petkiewicz

Email Address: shayne.petkiewicz@anaergia.com

Affiliation:

Subject: Congressman Donald McEachin letter to EPA Secretary Regan

Comment:

See letter attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-lcfs-wkshp-aug18-ws-Uz5RNAFIUmAHYgBo.pdf>

Original File Name: McEachin Methane Monitoring Letter to EPA.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:49:37

No Duplicates.

**Comment 48 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Chad

Last Name: Frahm

Email Address: chad.frahm@brightmark.com

Affiliation:

Subject: Brightmark comments to CARB LCFS Aug 18 workshop

Comment:

Please find comments attached. Thank you

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-lcfs-wkshp-aug18-ws-AGJRJQFpWW0HaVMn.pdf>

Original File Name: Brightmark Comments to CARB Aug 18 2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:49:53

No Duplicates.

**Comment 49 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Alexa  
Last Name: Combelic  
Email Address: acombelic@soy.org  
Affiliation: American Soybean Association

Subject: American Soybean Assn - August LCFS Workshop Comments  
Comment:

Please see attached PDF for comments from the American Soybean Association.

Attachment:

Original File Name: ASA Comments - CARB LCFS Workshop 2.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:56:24

No Duplicates.

## **Comment 50 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Sam

Last Name: Uden

Email Address: sam@csgcalifornia.com

Affiliation:

Subject: Biomass-H2 LCFS stakeholder comment letter

Comment:

Please see the attached letter from the following stakeholders:

- Sierra Business Council
- The Watershed Research and Training Center
- Sierra Institute for Community and Environment
- Tahoe Truckee Community Foundation
- Blue Forest Conservation
- UC Berkeley (Climate & Wildfire Institute)
- UC Berkeley (Center for Law, Energy and the Environment)
- Placer County Air Pollution Control District
- Mariposa County RCD
- Fall River RCD
- CLERE Inc.
- Conservation Strategy Group

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-lcfs-wkshp-aug18-ws-VTdTPFU7V2IVMgFy.pdf>

Original File Name: Biomass-H2 LCFS stakeholder comment letter\_Final - 09.19.2022.pdf

Date and Time Comment Was Submitted: 2022-09-19 14:19:19

No Duplicates.

**Comment 51 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Alexandra

Last Name: Frumar

Email Address: alexandra@remoracarbon.com

Affiliation: Remora

Subject: Remora Comments on August 18, 2022 LCFS Workshop

Comment:

Please see the attached comments from Remora on the August 18, 2022 Workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-lcfs-wkshp-aug18-ws-BjYGOVxzVDZSbVB+.pdf>

Original File Name: 09.19.2022 Remora 2nd LCFS Workshop Comments.pdf

Date and Time Comment Was Submitted: 2022-09-19 15:22:08

No Duplicates.

## **Comment 52 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: William

Last Name: Faulkner

Email Address: will@carbon-acumen.com

Affiliation: Carbon Acumen

Subject: LCFS Pull Forward Mechanism

Comment:

Please see the attached letter regarding my argument for a pull forward mechanism within the LCFS regulation. Thank you.

Will Faulkner

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-lcfs-wkshp-aug18-ws-WzgCZVMgU2JVDFQ4.pdf>

Original File Name: CARB LCFS Comments (1).pdf

Date and Time Comment Was Submitted: 2022-09-19 15:33:37

No Duplicates.

**Comment 53 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Ryan

Last Name: Kenny

Email Address: ryan.kenny@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: Comments: August LCFS Workshop

Comment:

Please find attached comments from Clean Energy concerning the update to the Low Carbon Fuel Standard. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-lcfs-wkshp-aug18-ws-VDdUPgdjU2EAaFUK.pdf>

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

Date and Time Comment Was Submitted: 2022-09-19 15:44:28

No Duplicates.

**Comment 54 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Holly  
Last Name: Yanai  
Email Address: hyanai@divertinc.com  
Affiliation:

Subject: Divert Comments to August 18 LCFS Workshop  
Comment:

Hello -

Please find Divert Inc.'s comments for the August 18 LCFS workshop attached. Should you have any questions, please do not hesitate to reach out.

Best,

Holly Yanai

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-lcfs-wkshp-aug18-ws-Wz8HaAN0BzEKfIMn.pdf>

Original File Name: Divert Comments for the August 18 LCFS Workshop .pdf

Date and Time Comment Was Submitted: 2022-09-19 15:45:21

No Duplicates.



**Comment 55 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Laurel  
Last Name: Moorhead  
Email Address: lmoorhead@transferflow.com  
Affiliation: Transfer Flow

Subject: Transfer Flow's LCFS Public Comment  
Comment:

Please find attached Transfer Flow, Inc.'s Public Comment to CARB regarding LCFS.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-lcfs-wkshp-aug18-ws-BTdRZ1BjWDlQe1dn.pdf>

Original File Name: 2022-09-19 LCFS Public Comment.pdf

Date and Time Comment Was Submitted: 2022-09-19 15:48:54

No Duplicates.

**Comment 56 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Brian

Last Name: McDonald

Email Address: bcmcdonald@marathonpetroleum.com

Affiliation:

Subject: Comments to LCFS workshop

Comment:

MPC comments to the LCFS workshop

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-lcfs-wkshp-aug18-ws-WjdRJ1c1Ag4AZVc4.pdf>

Original File Name: MPC comments to CARB LCFS Workshop 8.18.2022.pdf

Date and Time Comment Was Submitted: 2022-09-19 15:38:33

No Duplicates.

**Comment 57 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Mihaly

Last Name: Wekler

Email Address: mwekler@anewclimate.com

Affiliation: Anew Climate, LLC

Subject: Anew Climate comments to August 18 LCFS Workshop

Comment:

Please see Anew Climate's comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-lcfs-wkshp-aug18-ws-BWIQNVUyVnYBWAJ1.pdf>

Original File Name: LCFS Workshop 2022aug18 Comments Anew\_submitted2022sep19.pdf

Date and Time Comment Was Submitted: 2022-09-19 15:59:17

No Duplicates.

**Comment 58 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Christine

Last Name: Ball-Blakely

Email Address: cblakely@aldf.org

Affiliation:

Subject: Coalition Comments - LCFS Workshop

Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-lcfs-wkshp-aug18-ws-BTdUYgQ3BWRWfQY2.pdf>

Original File Name: 2022-09-19 - Coalition Comments on CARB LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-09-19 15:41:34

No Duplicates.

**Comment 59 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

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

Subject: CalETC comments  
Comment:

Comments on LCFS Residential Base Credit Estimation, Verification  
and Streamlining

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-lcfs-wkshp-aug18-ws-VTZUMwdqVWMHdQZl.pdf>

Original File Name: CalETC comment letter Sept 19, 2022 on August LCFS workshop vF.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:04:10

No Duplicates.

**Comment 60 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

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

Subject: UNICA's August 18, 2022 Workshop Comments  
Comment:

Please see attached UNICA's comments.  
Thank you,  
Leticia Phillips

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/64-lcfs-wkshp-aug18-ws-B3BXPgFyWGADdgNr.pdf>

Original File Name: WorkshopAugust2022- UNICA Commnets.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:04:17

No Duplicates.

**Comment 61 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Kelly

Last Name: Bott

Email Address: kbott@purewest.com

Affiliation: PureWest Energy

Subject: PureWest Energy comments on 8/18 LCFS workshop

Comment:

Please find our comments attached. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-lcfs-wkshp-aug18-ws-AXFWJVIhV2FVJAFk.pdf>

Original File Name: PureWest\_LCFS comments\_9.19.22.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:08:31

No Duplicates.

**Comment 62 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Zach

Last Name: Woogen

Email Address: [zwoogen@vgicouncil.org](mailto:zwoogen@vgicouncil.org)

Affiliation: Vehicle Grid Integration Council

Subject: Comments of Vehicle Grid Integration Council

Comment:

Comments of Vehicle Grid Integration Council on August 18 Staff  
Workshop

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-lcfs-wkshp-aug18-ws-BzVTZVFiWTgLIAEx.pdf>

Original File Name: 2022-09-19 VGIC Comments on Potential Changes to LCFS.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:11:53

No Duplicates.



**Comment 63 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Michael

Last Name: Pimentel

Email Address: michael@caltransit.org

Affiliation: California Transit Association

Subject: California Transit Association - LCFS Comment Letter  
Comment:

Attached here.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-lcfs-wkshp-aug18-ws-UzBXJVU1VlpVP1Q3.pdf>

Original File Name: CTA LCFS Program Comment Letter - 9-19-22.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:20:03

No Duplicates.

**Comment 64 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Peter

Last Name: Colussy

Email Address: peter.colussy@nexteraenergy.com

Affiliation:

Subject: NextEra

Comment:

NextEra Energy Resources appreciates the opportunity to submit comments on the August 18, 2022 public LCFS workshop.

Attachment:

Original File Name: NextEra LCFS Workshop Comments 091822.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:26:23

No Duplicates.

**Comment 65 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-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 Aug. 18th LCFS Workshop

Comment:

For your consideration, please find attached the joint comments by Clean Fuels Alliance America and the California Advanced Biofuels Alliance on the Aug. 18th LCFS workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-lcfs-wkshp-aug18-ws-AWJUPlczBzUDa1IN.pdf>

Original File Name: Clean Fuels\_CABA Comments CA LCFS Workshop\_August 2022 (FINAL).pdf

Date and Time Comment Was Submitted: 2022-09-19 16:41:50

No Duplicates.

## **Comment 66 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Colin  
Last Name: Murphy  
Email Address: cwmurphy@ucdavis.edu  
Affiliation: UC Davis Policy Institute

Subject: Comments on August 18 workshop  
Comment:

Hello,

Please find attached comments from the UC Davis Policy Institute for Energy, Environment, and the Economy regarding the August 18th workshop.

Thank you,

Colin Murphy

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-lcfs-wkshp-aug18-ws-VzRXMAZ1BzYCWwFt.pdf>

Original File Name: CARB\_LCFS\_UCD\_2022SEP19.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:43:20

No Duplicates.

**Comment 67 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

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

Subject: SRECTrade Comments on 8/18 LCFS Workshop  
Comment:

SRECTrade submits the attached comments in response to the 8/18 workshop.

Thanks,

Evan Rosenberg  
Senior Manager, Business Development  
SRECTrade  
evan.rosenberg@SRECTrade.com

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-lcfs-wkshp-aug18-ws-AnFSJlw4BDQAclUn.pdf>

Original File Name: SRECTrade Comments to CARB\_August LCFS Workshop\_9-19-2022.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:31:38

No Duplicates.

## **Comment 68 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Abhijeet

Last Name: Borole

Email Address: aborole@electroactive.tech

Affiliation: Electro-Active Technologies, Inc.

Subject: Comments on LCFS meeting on August 18, 2022

Comment:

Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-lcfs-wkshp-aug18-ws-B2sFZlYjWX4EZwd1.docx>

Original File Name: Letter to CARB - August 18 LCFS meeting.docx

Date and Time Comment Was Submitted: 2022-09-19 16:44:48

No Duplicates.

## **Comment 69 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Pedro  
Last Name: Piris-Cabezas  
Email Address: ppiris@edf.org  
Affiliation:

Subject: Public Workshop to Discuss Potential Changes to the LCFS  
Comment:

Please find here attached EDF's comments. Thanks.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/73-lcfs-wkshp-aug18-ws-Wz5VN1A3UFwDYQV3.pdf>

Original File Name: EDF draft comments to CARB LCFS (verification and electrofuels) 09192022.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:02:30

No Duplicates.

**Comment 70 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Cassandra

Last Name: Farrant

Email Address: cfarrant@ampamericas.com

Affiliation: Amp Americas

Subject: Comments on the August 18, 2022, Public Workshop to Potential Changes to the LCFS  
Comment:

Amp America appreciates the opportunity to submit comments in response to the August 18, 2022, Public Workshop to Discuss Potential Changes to the LCFS. Please see our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-lcfs-wkshp-aug18-ws-UDEAa10sAAwDaVQ3.pdf>

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

Date and Time Comment Was Submitted: 2022-09-19 16:53:36

No Duplicates.



## **Comment 71 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Orville  
Last Name: Thomas  
Email Address: othomas@calstart.org  
Affiliation: CALSTART

Subject: CALSTART LCFS Comments  
Comment:

September 19, 2022

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

SUBJECT: Public Workshop to Discuss Potential Changes to Low Carbon Fuel Standard

To Whom it May Concern,

On behalf of CALSTART, I want to extend our appreciation for the opportunity to submit feedback regarding the potential changes to the Low Carbon Fuel Standard (LCFS) program. Since its initial implementation 2011, the LCFS program has allowed California to decrease carbon in our state's fuel pool and accelerated new technology and alternatives to petroleum fuel. The program has also served a valuable incentive program in helping bring new companies and their ideas for zero-emission fuels and technology into the state's fuel market.

CALSTART and our Origins

CALSTART is a California-based, international nonprofit that is a recognized clean transportation technology consortium. Our 300+ members are all dedicated to the growth of the clean transportation industry, and we work with public and private sectors to drive innovation in the sustainable transportation sector. CALSTART membership is comprised of vehicle manufacturers, transit agencies, public and private fleets, mobility partners, parts and component manufacturers, EV charging station and hydrogen refueling providers, battery manufacturers, and more.

Founded in Southern California in 1972, CALSTART has provided services and consulting to spur advanced transportation technologies, fuels, systems, and the companies that make them. Since our inception, CALSTART has partnered with California and several states to enact groundbreaking policies aimed at reducing and eliminating emissions from the transportation sector. We also administer several programs in California and across the country that help provide funding to fleets, companies, and manufacturers to help accelerate zero-emission vehicle adoption.

CALSTART's latest initiative, The Global Drive to Zero, has our staff working with foreign governments, sub-national governments, and industries to achieve a 100 percent zero-emission new truck and bus sales goal by 2040 with an interim 2030 mark of 30 percent zero-emission vehicles sales.

LCFS Past, Present, and Future

California's LCFS program is a model for other states in their efforts to curb the carbon intensity (CI) of transportation fuels. Currently, California's LCFS program is projected to decrease CI

below the 20 percent goal by 2030.

CALSTART recommends CARB extend the LCFS program to 2045, with interim CI targets set up every five years (2035, 2040). This timeline matches up with the Governor's Executive Order (EO N-79-20) to turn over 100 percent of the truck fleets to zero-emission by 2045. That date also would incorporate programs like Advanced Clean Cars II, Advanced Clean Trucks, and Advanced Clean Fleets.

For the near future, California should aim for the highest CI reduction target possible for 2030. Out of the options provided, CALSTART asks CARB to make Option B (30 percent CI reduction by 2030 compared to 2010) the goal.

In July, Governor Newsom wrote a letter to CARB Chair Randolph pushing for "greater opportunities to reduce our dependence on fossil fuels to achieve our air quality and climate targets," and continue the diversification of fuels away from petroleum in the transportation sector. Part of his ask was to evaluate and consider an increase in the stringency of the LCFS. With that said, CALSTART asks CARB to evaluate whether the 2030 goal can be even more aggressive than Option B and use 30 percent as the floor on what a strong and realistic CI reduction goal should be. CALSTART also encourages CARB staff to look at Oregon and their current proposals for CI reduction. A possible 2035 goal could be to align California and Oregon with 37 percent CI reduction.

Moving forward, CALSTART believes the setting of more stringent goals in 2030 and out years will send a strong signal to the marketplace and investors. A commitment to an increasingly more ambitious CI reduction would lead to more money entering the industry and helping California increase the clean fuel options available to customers.

#### Infrastructure Crediting into the Future:

CALSTART encourages CARB to expand capacity credits for Fast Charging Infrastructure (FCI) and Hydrogen Refueling Infrastructure (HRI). The medium- and heavy-duty (MHD) transportation sector disproportionately accounts for harmful emissions comparative to the number of vehicles they have on the road. CARB expanding credit pathways to support MHD trucks is a great opportunity to address high-emitting vehicles and incentivize more funding towards charging and refueling infrastructure.

A focus on MHD infrastructure is important given the need to get companies and fleets to transition to zero-emission. With potential regulations on the horizon for a full fleet transition, those looking to purchase a zero-emission truck need FCI and HRI options in place.

CALSTART encourages CARB to work with stakeholders regarding MHD public charging or public/private charging locations. These conversations are more important if the public, public/private charging location would be inclusive of light-duty (LD) in addition to MHD. Safety concerns, different infrastructure needs, and time of charge requirements are all elements needing to be addressed before construction on infrastructure begins so that the charging location can scale up as needed in the future.

CALSTART encourages CARB to work with stakeholders and manufacturers/operators regarding LD charging in multifamily units. Research in charging equity continue to show a lack of adequate charging infrastructure in multifamily locations. Consideration of reclassification from multifamily to non-residential for LCFS purposes has been a topic of discussion regarding how to incentivize more investments into charging installation and allow benefits to be received by early investing companies and operators who take larger risks with their investments.

Conclusion:

CALSTART appreciates the opportunity to submit public comment regarding several of the topics CARB is looking to address in their review of the LCFS program. Where we did not submit formal comments, we encourage CARB to engage with stakeholder and industry leaders and offer our services to arrange meetings for CARB staff.

The LCFS program continues to be one of the best drivers for reduction of carbon in fuel and opportunities to incentivize and promote investments in cleaner fuel and zero-emission infrastructure. The basis of the program should be adopted by other states in the country and CALSTART will continue to push for multi-state adoptions based on the successes of California's LCFS program.

Thank you for your time and consideration. Please feel free to reach out if there are any comments or questions.

Orville Thomas  
State Policy Director  
CALSTART

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-lcfs-wkshp-aug18-ws-UjFXMF0wVXUHdVU0.pdf>

Original File Name: CALSTART LCFS Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:52:59

No Duplicates.

## **Comment 72 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Noah

Last Name: Jackson

Email Address: noah.jackson@yosemiteclean.com

Affiliation: Yosemite Clean Energy

Subject: Changes to the Low Carbon Fuel Standard regarding carbon neutral forest residuals

Comment:

See attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/76-lcfs-wkshp-aug18-ws-VmQHMQEyVjdWYFVs.docx>

Original File Name: 20220919 YCE Comments to CARB Potential Changes to the LCFS NJ.v1.docx

Date and Time Comment Was Submitted: 2022-09-19 16:50:54

No Duplicates.

**Comment 73 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: John

Last Name: O'Donnell

Email Address: john@rondo.com

Affiliation: Rondo Energy

Subject: LCFS Workshop Comments

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/77-lcfs-wkshp-aug18-ws-BzVTZ1dmA2kFMggx.pdf>

Original File Name: 220919 Rondo LCFS Aug 2022 response.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:55:36

No Duplicates.

**Comment 74 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Caelin  
Last Name: MacIntosh  
Email Address: cmacintosh@ajw-inc.com  
Affiliation:

Subject: Iogen, World Energy & AJW Comments on the Aug. 18 LCFS Workshop  
Comment:

Attached please find our comments. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/78-lcfs-wkshp-aug18-ws-BTdXYwAxVT8EMwI7.pdf>

Original File Name: 220919 LCFS Comments Tier 1 H2 Calculator.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:50:38

No Duplicates.

## **Comment 75 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Daryl

Last Name: Maas

Email Address: daryl@maasenergy.com

Affiliation:

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

Maas Energy Works (Maas) is a family-owned digester development company committed to effectively reducing methane emissions from dairy and swine manure in order to ensure a sustainable and renewable future. We express our deepest gratitude to the California Air Resources Board (CARB) for your continued support and development of the Low Carbon Fuel Standard (LCFS).

The LCFS is a crucial player in the continued success of Renewable Natural Gas (RNG), and thus a crucial player in the possibility of an optimally clean future. As a digester developer, Maas assumes responsibility in supporting growth factors contributing to the LCFS. Therefore, Maas humbly and respectfully submits the following comments in response to CARB's LCFS Workshop (Workshop) held on August 18, 2022:

At the Workshop, CARB presented the concept of a temporary credit true up at time of Certified carbon intensity (CI) score approval. This kind of true up would rectify under crediting to pathway holders, limit unnecessary costs to producers, and reduce the urgency from pathway applicants for CARB to process Tier 2 applications quickly.

Under crediting pathway holders under temporary CI score use is not a most accurate representation of a project's carbon negative effect. Not only would reduced emissions be accurately depicted, but the incentive to pathway holders would bolster further project development within the LCFS program.

Developers typically seek time-consuming, complex, and expensive storage contracts in order to avoid use of a temporary CI score. Adoption of a temporary credit true up would eliminate a dispenser's need to accumulate large portions of storable gas inventory as well as allow for more market incorporation of smaller, local fleets that may not have access to such large fleets to dispense stored gas in bulk. A temporary credit true up would near immediately streamline and smooth the gas storage and dispensing processes.

Furthermore, Maas supports the concept of a retroactive, consistent annual credit true up between verified operational and certified CI scores.

Currently, in existing LCFS regulations CARB requires invalidated credits if a project's verified operational CI score is higher than the certified CI score. Maas recognizes and accepts the need of these invalidated credits to prevent credit overgeneration. However, if a project's verified operational CI score is lower than the certified CI score, no benefit is recognized. The result is under crediting pathway holders and therefore an unnecessary, inaccurate representation of a project's reduced emissions. Consequently, GHG benefits of the LCFS program are underrepresented. As the LCFS program's targets grow more

progressive, underrepresentation is a detriment to the program's long-term success.

Tier 2 Pathways will especially benefit from a consistent annual credit true up given the potential for factor variability. For example, a simple fluctuation in annual average temperature could serve a driving factor in carbon negativity or positivity. To offset uncontrollable variables, a dairy digester project is currently incentivized to verify conservative CI scores so as to avoid the potential for exceeding the year prior's certified CI score. There is not incentive to achieve a lower score, as maintenance of a lower score year-to-year is difficult to achieve. In that case, it is almost always inevitable that achieving a lower CI score will result in ultimate invalidated credits in future verification(s) with no credit reward to offset the loss.

Oregon's Clean Fuel Standard is considering a full annual true up. Maas partners with pathway holders to suggest language adopted from Oregon's proposal as an incorporation into the California LCFS rules:

Annual Credit True-up. CARB will automatically issue additional credits from the prior year to correct for any difference between a verified operational carbon intensity and any certified carbon intensity (including temporary and provisional) if all of the following is true: (A) The pathway holder has successfully completed annual verification by receiving a positive or qualified positive verification statement for the relevant Annual Fuel Pathway Report, (B) The verified operational carbon intensity value for a given pathway is lower than the certified carbon intensity value used for initial crediting, and (C) the credit generator has received a positive or qualified positive verification statement for the relevant Quarterly Fuel Transaction Reports.

Allowing not only a temporary credit true up, but also an annual credit true up would mitigate the tendency to certify conservative CI scores. Mitigating this tendency alongside resolving the underrepresentation of projects' annual emission reductions would serve a most realistic depiction of RNG impact. Incentivizing lower CI scores would encourage process efficiency, carbon capture, methane leakage, and all other carbon negative factors playing a crucial role in achieving CARB's and the industry's goal of carbon neutrality.

Thus, approval of both temporary and annual credit true ups is approval of optimal LCFS program success and approval of industry development. Maas thanks CARB as these comments are reviewed and considered.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-09-19 16:57:19

No Duplicates.



**Comment 76 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) - 1st Workshop.**

First Name: Lucille

Last Name: Cadic

Email Address: lucille.cadic@airliquide.com

Affiliation: Air Liquide Advanced Technologies U.S. L

Subject: subject of comment

Comment:

Comments submitted to Public Workshop to Discuss Potential Changes  
to the Low Carbon Fuel Standard

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/80-lcfs-wkshp-aug18-ws-VjcCbVIhAnwEbgRt.pdf>

Original File Name: Air-Liquide-LCFS-Comment-2022-10-26 .pdf

Date and Time Comment Was Submitted: 2022-11-02 15:15:38

No Duplicates.

**There are no comments posted to Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-aug18-ws) that were presented during the Workshop at this time.**