

## **Comment 1 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: mark

Last Name: krebsbach

Email Address: mkrebsbach@westernmilling.com

Affiliation: Absolute Energy

Subject: indirect land use

Comment:

From 2000 onwards, the total area of land in U.S. farms has decreased annually, aside from a small increase in 2012. Over the time period displayed, the total farmland area has decreased by almost 50 million acres, reaching a total of 895.3 million acres as of 2021.

CARB's use of indirect land use seems to be in direct contrast to farming practices in the US, where farmland acreage has decline almost every year since 2000, even with increased use of corn and soyoil in biofuels.

Buying Ethanol from Brazil, while Brazil increases it's corn acreage would actually encourage indirect land use for Brazil. Making it worse, CARB's policies encourage the exports of ethanol to Brazil while shipping ethanol to California, creating a waste of energy and resources to accommodate a flawed policy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-11-09 16:21:16

No Duplicates.

## **Comment 2 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Sohan

Last Name: Todankar

Email Address: sohan.todankar@powerflex.com

Affiliation:

Subject: Confusion related to chargers Eligibility

Comment:

It will be very helpful for EV operators like us if there is a detail documents which exactly states which chargers are not eligible for LCFS so there is no confusion. Current document is confusing when it come to Chargers Eligibility

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-11-18 13:30:24

No Duplicates.

### **Comment 3 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Patricia (Terra)

Last Name: Arnal Luna

Email Address: tarnal@ucdavis.edu

Affiliation: University of California Davis -ITS

Subject: Bolster Renewable Hydrogen and cap Biofuels in the Low Carbon Fuels Standard model (CATS)

Comment:

In synergy with DOE's \$8 BUSD to build a clean hydrogen system, CARB can design the parameters in the CATS mode for LCFS to increase consumption of a renewable hydrogen that can be transported, stored, and used as a fuel without causing irreparable damage on tropical habitats and food scarcity that leaning on biofuels for deep decarbonization generate.

Happy to share more on the topic.

Terra Arnal Luna

TTP PhD Student University of California Davis

Attachment: [www.arb.ca.gov/lists/com-attach/6-lcfs-wkshp-nov22-ws-AGMGb10xAD5QM1M9.pdf](http://www.arb.ca.gov/lists/com-attach/6-lcfs-wkshp-nov22-ws-AGMGb10xAD5QM1M9.pdf)

Original File Name: CommentCARB\_LCFSPresentation20221109.pdf

Date and Time Comment Was Submitted: 2022-11-23 14:46:54

No Duplicates.

## **Comment 4 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Sam

Last Name: Uden

Email Address: sam@csgcalifornia.com

Affiliation: Conservation Strategy Group

Subject: Waste biomass, CCS in CATS model

Comment:

See file attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7-lcfs-wkshp-nov22-ws-UT1UMQdgUXEBWFU2.pdf](http://www.arb.ca.gov/lists/com-attach/7-lcfs-wkshp-nov22-ws-UT1UMQdgUXEBWFU2.pdf)

Original File Name: LCFS Comment Letter\_CSG\_Nov 2022.pdf

Date and Time Comment Was Submitted: 2022-11-30 07:54:05

No Duplicates.

## **Comment 5 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Eric

Last Name: McAfee

Email Address: eric.mcafee@aemetis.com

Affiliation: Chairman/CEO Aemetis, Inc.

Subject: Comments submitted to Public Workshop to Discuss Potential Changes to the Low Carbon Fuel  
Comment:

CARB staff,

As the largest LCFS credit producer in California from ethanol from our 65 million gallon per year plant near Modesto, Aemetis has repeatedly warned during the past 18 months that the regulatory goals of cleaner air and reduced carbon emissions in California are being damaged by the crash of the LCFS credit price from \$218 in August 2020 to \$63 today.

That LCFS price decrease equals the decrease in revenues from LCFS credits for renewable fuels in California. The LCFS price decline has already closed 100 million gallons of ethanol plants in California as a direct result of the LCFS credit crash since 2020.

Though less noticeable, the failure to finance and construct billions of gallons of renewable aviation and renewable diesel production capacity has also occurred in the past two years. Where are the 8.4 billion gallons of new renewable diesel production that was announced in 2020, mostly by the conversion of oil refineries?

CARB staff has often stated that "the price of LCFS credits is not our role or responsibility".

Hypocritically, a price cap was established and a process of granting "free" LCFS credits to regulated utilities was publicly presented in August 2020 at a CARB hearing led by Jim Duffy.

It is not a coincidence that LCFS credits that have a clearly stated cap of \$200 plus the Cost of Living, but no stated LCFS credit price floor, would begin to decline rapidly after the August 2020 hearing.

We are now at \$63 per LCFS credit and the price is still falling. How does CARB staff expect commercial lenders to provide 20-year project debt financing for new hydrogen, green electricity, aviation and other renewable fuels production facilities when the LCFS price has steadily declined from \$218 to \$63 in the past 26 months?

In order to fix this miserable downward LCFS price trend, CARB must acknowledge that the Low Carbon Fuel Standard is now clearly failing to attract new investment to build new productive renewable energy assets.

And, the renewable fuels plants funded and built prior to August 2020 have even begun to be shut down - starting with the collapse of 50% of the ethanol production plants in California that have now closed operations and lost a combined \$300 million of debt and equity investment.

In other words, 50% of the canaries in the coal mine were killed by the failure by CARB to provide a price floor in the LCFS credit market - while firmly enforcing a price ceiling.

This manipulation of the market in only one direction (down) has killed the LCFS market entirely as a revenue source to repay project debt, so lenders have largely stopped funding renewable projects that rely on LCFS revenues or high interest rates and short repayment terms are demanded by lenders.

Unfortunately, unlike independent renewable energy companies such as Aemetis, major oil companies are exempt from the need for lenders, since their massive oil & gas profits enable refiners to invest without the accountability of outside banks making project financing decisions.

If CARB wants to attract investment, create jobs, improve air quality and reduce emissions in California, we must have a trading range for LCFS credits that is between \$200 (floor) and \$200+COLI (cap).

Without this trading range, banks have already walked away from the LCFS renewable credit market as a source of debt repayment due to hundreds of millions of dollars of financial losses that already have occurred due to two years of unrelenting LCFS credit price declines.

We live and work in the world that CARB is attempted to positively influence: the people that build things, pay payrolls, and need to obtain debt and equity to operate. The crash of the LCFS credit price has been an avoidable tragedy that CARB elected not to prevent or intervene to fix while it was occurring.

Now we need CARB to provide predictable, low volatility LCFS prices for the next 20+ years in order to attract lenders back into the project finance market.

Cheryl, Matt, Rajinder and others at CARB need to take personal responsibility for the crash in LCFS prices and understand the damage to the credibility of CARB among all debt and equity investors.

And, this team needs to personally champion an automatic price adjustment system to provide a stable, long term LCFS credit market price to repair the damage that has been done to the credibility of the program and the institution.

Automatic Credit Price formula:

1. Set price floor at \$200 per credit
2. If LCFS price is 10% below the target price during a six month period, then the next six month period would have a 10% increase in the number of LCFS credits required.

Thanks.

Eric McAfee  
Chairman/CEO  
Aemetis, Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-11-30 09:37:06

No Duplicates.

**Comment 6 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: CIPA LCFS Workshop Comments  
Comment:

See attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/9-lcfs-wkshp-nov22-ws-VjVQPwNyVWcFxFQ4.pdf](http://www.arb.ca.gov/lists/com-attach/9-lcfs-wkshp-nov22-ws-VjVQPwNyVWcFxFQ4.pdf)

Original File Name: CIPA LCFS Comments 12-9-22.pdf

Date and Time Comment Was Submitted: 2022-12-01 09:14:58

No Duplicates.



## **Comment 7 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Victoria

Last Name: Bogdan Tejeda

Email Address: vbogdantejeda@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Comment, lcfs-wkshp-nov22-ws

Comment:

The Center for Biological Diversity appreciates the opportunity to comment on CARB's proposed changes to the Low Carbon Fuel Standard (LCFS). We offer several concerns and suggestions.

We have attached a PDF with our full comment.

In summary, our concerns:

First, now that California has banned use of carbon dioxide (CO<sub>2</sub>) from carbon capture and storage (CCS) for enhanced oil recovery (EOR) within the state, CARB must remove CCS-related EOR from the LCFS. At present, CARB continues to incentivize EOR out-of-state and assume use of this harmful technology in its modeling.

Second, CARB's carbon intensity calculations for fuels made using CCS, such as ethanol with CCS and blue hydrogen, fail to reflect real-world CO<sub>2</sub> capture efficiencies or account for CO<sub>2</sub> and methane emissions across the CCS lifecycle. As a result, CARB significantly underestimates the carbon intensities of fuels made using CCS, and these methodological errors must be corrected.

Third, CARB's CA-GREET model currently underestimates the carbon intensity of fuels made with fossil gas and biogas, such as CNG fuels, factory farm gas, and hydrogen, because it relies on assumptions for methane leakage that dramatically underestimate leakage rates and are inconsistent with the best-available science.

Finally, CARB must consider an alternative with aggressive targets in carbon intensity reductions and rapid phase-down of fossil fuels that incentivizes truly renewable fuels that minimize impacts, rather than alternatives that emphasize technologies like CCS.

Please note that we have attached references cited in this letter in a .zip file titled, "Ctr. Biol Div Refs LCFS 12.2.22," for CARB's consideration and for inclusion in the public record.

Attachment: [www.arb.ca.gov/lists/com-attach/10-lcfs-wkshp-nov22-ws-BTcHM1V6BWdWYgUr.pdf](http://www.arb.ca.gov/lists/com-attach/10-lcfs-wkshp-nov22-ws-BTcHM1V6BWdWYgUr.pdf)

Original File Name: 22.12.2 LCFS Comment - Ctr Biol Diversity .pdf

Date and Time Comment Was Submitted: 2022-12-02 08:46:31

No Duplicates.

**Comment 8 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Brady  
Last Name: Borcharding  
Email Address: bborcherding@fce.com  
Affiliation:

Subject: FuelCell Energy comments on Changes to the LCFS  
Comment:

Please see the attached PDF for the full set of comments from FuelCell Energy in response to the November 9th workshop on changes to the LCFS.

Attachment: [www.arb.ca.gov/lists/com-attach/14-lcfs-wkshp-nov22-ws-AmRWJVI2BDsAZVcy.pdf](http://www.arb.ca.gov/lists/com-attach/14-lcfs-wkshp-nov22-ws-AmRWJVI2BDsAZVcy.pdf)

Original File Name: FuelCell Energy LCFS Comments 12-2-22.pdf

Date and Time Comment Was Submitted: 2022-12-02 15:04:43

No Duplicates.

**Comment 9 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: Re: Nov. 9th Workshop - Comments on the CATS Model  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/15-lcfs-wkshp-nov22-ws-B2sAYwF0V3AGZQFz.pdf](http://www.arb.ca.gov/lists/com-attach/15-lcfs-wkshp-nov22-ws-B2sAYwF0V3AGZQFz.pdf)

Original File Name: Letter to CARB 12-02-2022.pdf

Date and Time Comment Was Submitted: 2022-12-02 15:46:57

No Duplicates.

**Comment 10 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Amanda

Last Name: Parsons DeRosier

Email Address: amanda.derosier@gceholdings.com

Affiliation: Global Clean Energy

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

Please find comments from Global Clean Energy attached. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/16-lcfs-wkshp-nov22-ws-VDdUM1AjWGIRCAZq.pdf](http://www.arb.ca.gov/lists/com-attach/16-lcfs-wkshp-nov22-ws-VDdUM1AjWGIRCAZq.pdf)

Original File Name: CARB LCFS COMMENT LETTER 12\_2 FINALdocx.pdf

Date and Time Comment Was Submitted: 2022-12-02 18:35:27

No Duplicates.

**Comment 11 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Laedon  
Last Name: Kang  
Email Address: raykang@ucdavis.edu  
Affiliation:

Subject: subject of comment  
Comment:

Comments submitted by Laedon Kang

Master student at UC Davis Transportation Technology and Policy

For the Nov 9th workshop

Attachment: [www.arb.ca.gov/lists/com-attach/17-lcfs-wkshp-nov22-ws-BmVT0lc7BTsGZQln.pdf](http://www.arb.ca.gov/lists/com-attach/17-lcfs-wkshp-nov22-ws-BmVT0lc7BTsGZQln.pdf)

Original File Name: Comment.pdf

Date and Time Comment Was Submitted: 2022-12-02 19:41:10

No Duplicates.

**Comment 12 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jeff

Last Name: Wasil

Email Address: jwasil@nmma.org

Affiliation: National Marine Manufacturers NMMA

Subject: Comments on the importance of sustainable liquid fuels for recreational marine

Comment:

The National Marine Manufacturers Association (NMMA) is pleased to provide the attached comments on the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/18-lcfs-wkshp-nov22-ws-AW8BagFtADIBWAVp.pdf](http://www.arb.ca.gov/lists/com-attach/18-lcfs-wkshp-nov22-ws-AW8BagFtADIBWAVp.pdf)

Original File Name: NMMA Letter re California Low Carbon Fuel Standard 12\_02\_2022 WASIL.pdf

Date and Time Comment Was Submitted: 2022-12-02 20:33:40

No Duplicates.

## **Comment 13 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Dave

Last Name: Rhody

Email Address: dave@rhodyco.com

Affiliation: SF Climate Reality Project

Subject: LCFS / Biofuels

Comment:

Though it is encouraging to see CARB is giving a nod to the warnings about crop-based biofuels, it's quite disturbing to see that you're still planning to subsidize biofuels.

Biofuels may be cleaner but are not, by any means, clean. They may even be doing more harm than good.

Researchers at the International Council on Clean Transportation (ICCT) calculate that the emissions from planting, fertilizing, harvesting, transporting and refining the crops used to make biofuel are nearly as high as petroleum emissions.

Prominent Princeton climate researcher Tim Searchinger has stated that biofuels are often worse for the environment than gasoline.

Citing Searchinger's research, the Union of Concerned Scientists reported, "When crop-based biofuels contribute to deforestation or other damaging land conversions, the pollution benefits can be compromised or even eliminated, potentially producing a net increase in pollution."

CARB's enormous assets are put to far better use by incentivizing the electrification of transportation not delaying that process by making the public believe biofuels are clean.

Attachment: [www.arb.ca.gov/lists/com-attach/19-lcfs-wkshp-nov22-ws-AF9cBVIMUGEAbwlm.doc](http://www.arb.ca.gov/lists/com-attach/19-lcfs-wkshp-nov22-ws-AF9cBVIMUGEAbwlm.doc)

Original File Name: \*\*\*BIOFUELKeyArticles:Links.doc

Date and Time Comment Was Submitted: 2022-12-05 13:57:27

No Duplicates.

**Comment 14 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-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:

Thank you for the opportunity to submit this feedback. Please find our letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/20-lcfs-wkshp-nov22-ws-AGVQOwdlAw9SN1I9.pdf](http://www.arb.ca.gov/lists/com-attach/20-lcfs-wkshp-nov22-ws-AGVQOwdlAw9SN1I9.pdf)

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

Date and Time Comment Was Submitted: 2022-12-07 13:26:19

No Duplicates.



**Comment 15 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: William

Last Name: Brieger

Email Address: will.brieger@350Sacramento.org

Affiliation: 350 Sacramento

Subject: Comments on LCFS amendments workshop 11-9-2022

Comment:

Please see attached comments on behalf of several organizations.

Attachment: [www.arb.ca.gov/lists/com-attach/21-lcfs-wkshp-nov22-ws-W2lXYVdkB2YFLgU0.pdf](http://www.arb.ca.gov/lists/com-attach/21-lcfs-wkshp-nov22-ws-W2lXYVdkB2YFLgU0.pdf)

Original File Name: 2022-11-09 lcfs workshop comments from 350 Sacto.docx.pdf

Date and Time Comment Was Submitted: 2022-12-08 11:49:19

No Duplicates.

**Comment 16 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Cory  
Last Name: Bullis  
Email Address: cbullis@flo.com  
Affiliation:

Subject: FLO EV Charging Comments on LCFS Workshop  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/22-lcfs-wkshp-nov22-ws-WjxSOAdpWVVWM1Q7.pdf](http://www.arb.ca.gov/lists/com-attach/22-lcfs-wkshp-nov22-ws-WjxSOAdpWVVWM1Q7.pdf)

Original File Name: FLO Comments on ARB LCFS Workshop December 2022.pdf

Date and Time Comment Was Submitted: 2022-12-08 15:57:45

No Duplicates.

## **Comment 17 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Md Musfiqur Rahman

Last Name: Bhuiya

Email Address: mrbhuiya@crimson.ua.edu

Affiliation:

Subject: RE: California Air Resources Board's Low Carbon Fuel Standard (LCFS) Public Workshop: Conc  
Comment:

Hello

I am Md Musfiqur (Sifat) Rahman Bhuiya. I am submitting the following documents in response to California Air Resources Board's Low Carbon Fuel Standard (LCFS) Public Workshop: Concepts and Tools for Compliance Target Modeling. November 9, 2022 public workshop.

Sifat

Attachment: [www.arb.ca.gov/lists/com-attach/23-lcfs-wkshp-nov22-ws-AXIAbwdgV2UKeANh.docx](http://www.arb.ca.gov/lists/com-attach/23-lcfs-wkshp-nov22-ws-AXIAbwdgV2UKeANh.docx)

Original File Name: SifatBhuiya\_LCFS\_HA.docx

Date and Time Comment Was Submitted: 2022-12-08 23:01:18

No Duplicates.

**Comment 18 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: Divert Comments for the November 9 Workshop  
Comment:

Hello,

Please find Divert Inc.'s comments to the November 9th workshop attached.

Best,

Holly Yanai

Attachment: [www.arb.ca.gov/lists/com-attach/24-lcfs-wkshp-nov22-ws-WjRSO1AnWG4DaAZk.pdf](http://www.arb.ca.gov/lists/com-attach/24-lcfs-wkshp-nov22-ws-WjRSO1AnWG4DaAZk.pdf)

Original File Name: November 9 CARB workshop Comments .pdf

Date and Time Comment Was Submitted: 2022-12-09 11:45:31

No Duplicates.

**Comment 19 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Anja  
Last Name: Raudabaugh  
Email Address: paul@wudairies.com  
Affiliation: Western United Dairies

Subject: LCFS Comments  
Comment:

Please see attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/25-lcfs-wkshp-nov22-ws-B3ABcgFkAAwBa1c0.pdf](http://www.arb.ca.gov/lists/com-attach/25-lcfs-wkshp-nov22-ws-B3ABcgFkAAwBa1c0.pdf)

Original File Name: WUD LCFS comments 12.09.22.pdf

Date and Time Comment Was Submitted: 2022-12-09 13:16:50

No Duplicates.

**Comment 20 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Melicia

Last Name: Charles

Email Address: melicia.charles@mainspringenergy.com

Affiliation: Mainspring Energy Inc.

Subject: Comments on Nov 9th Workshop on LCFS Changes

Comment:

Attached please find Mainspring Energy's comments on the Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard Public Workshop to Discuss Potential Changes - held on 11/9/22

Attachment: [www.arb.ca.gov/lists/com-attach/26-lcfs-wkshp-nov22-ws-VzoHYAFpVWhSJwJy.pdf](http://www.arb.ca.gov/lists/com-attach/26-lcfs-wkshp-nov22-ws-VzoHYAFpVWhSJwJy.pdf)

Original File Name: Mainspring Comments on LCFS Nov 9th Workshop FINAL.pdf

Date and Time Comment Was Submitted: 2022-12-09 15:39:29

No Duplicates.

**Comment 21 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Melodee

Last Name: Black

Email Address: melodee.black@sce.com

Affiliation:

Subject: SCE's comments on the Nov 9, 2022 LCFS Public Workshop

Comment:

SCE appreciates the opportunity to submit these written comments

Attachment: [www.arb.ca.gov/lists/com-attach/27-lcfs-wkshp-nov22-ws-WjZVMFw7VHQDWgl+.pdf](http://www.arb.ca.gov/lists/com-attach/27-lcfs-wkshp-nov22-ws-WjZVMFw7VHQDWgl+.pdf)

Original File Name: LCFS Workshop.SCE Comments.Dec.9.2022.final.pdf

Date and Time Comment Was Submitted: 2022-12-09 17:20:08

No Duplicates.

**Comment 22 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: CR&R Environmental Services Comments on the Public Workshop  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/28-lcfs-wkshp-nov22-ws-B2sAZQZhAyNWDwNg.pdf](http://www.arb.ca.gov/lists/com-attach/28-lcfs-wkshp-nov22-ws-B2sAZQZhAyNWDwNg.pdf)

Original File Name: LCFS Comment Letter (Dec. 9)\_Final.pdf

Date and Time Comment Was Submitted: 2022-12-09 17:28:58

No Duplicates.



**Comment 23 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Natalie

Last Name: Nax

Email Address: natalie@caleec.com

Affiliation: EVCA

Subject: EVCA Comments on Potential Changes to LCFS

Comment:

Please see comments from the Electric Vehicle Charging Association attached.

Attachment: [www.arb.ca.gov/lists/com-attach/29-lcfs-wkshp-nov22-ws-BjdTZ1AOVz1VDFdl.pdf](http://www.arb.ca.gov/lists/com-attach/29-lcfs-wkshp-nov22-ws-BjdTZ1AOVz1VDFdl.pdf)

Original File Name: 12:9:22 EVCA comments on November 9th Workshop on Potential Changes to the LCFS.pdf

Date and Time Comment Was Submitted: 2022-12-10 12:17:18

No Duplicates.

**Comment 24 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Stephen

Last Name: Rosenblum

Email Address: poll@rosenblums.us

Affiliation: Climate Action California

Subject: Renewable Diesel is not a climate solution

Comment:

Please accept our comments in the attached document concerning renewable diesel. We do not believe that RD offers any sort of climate solution.

Attachment: [www.arb.ca.gov/lists/com-attach/30-lcfs-wkshp-nov22-ws-UDNUMwFyVWRSeVI+.pdf](http://www.arb.ca.gov/lists/com-attach/30-lcfs-wkshp-nov22-ws-UDNUMwFyVWRSeVI+.pdf)

Original File Name: CARB-LCFS\_RD.pdf

Date and Time Comment Was Submitted: 2022-12-10 19:59:00

No Duplicates.

**Comment 25 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: Comments LCFS Workshop Nov 9  
Comment:

Please find our comment letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/31-lcfs-wkshp-nov22-ws-WjVWMIM3WXhROAhm.pdf](http://www.arb.ca.gov/lists/com-attach/31-lcfs-wkshp-nov22-ws-WjVWMIM3WXhROAhm.pdf)

Original File Name: Oberon Fuels Comments on CARB LCFS Workshop November 9 2022.pdf

Date and Time Comment Was Submitted: 2022-12-12 07:40:05

No Duplicates.

**Comment 26 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Angela

Last Name: Richards

Email Address: arichards@monarchtractor.com

Affiliation: Monarch Tractor

Subject: 11.9.22 LCFS Workshop

Comment:

Monarch Tractor appreciates the opportunity to submit comments in response to this workshop. Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/32-lcfs-wkshp-nov22-ws-V2ZXYFR7VjxVfVVn.pdf](http://www.arb.ca.gov/lists/com-attach/32-lcfs-wkshp-nov22-ws-V2ZXYFR7VjxVfVVn.pdf)

Original File Name: 11.9.22 LCFS Workshop Comment Letter - Monarch Tractor - Final.docx.pdf

Date and Time Comment Was Submitted: 2022-12-12 14:36:20

No Duplicates.

**Comment 27 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Julia

Last Name: Levin

Email Address: jlevin@bioenergyca.org

Affiliation: Bioenergy Association of California

Subject: BAC Comments on Nov. LCFS Workshop

Comment:

Please find attached BAC's comments on the November LCFS workshop presentation.

Attachment: [www.arb.ca.gov/lists/com-attach/33-lcfs-wkshp-nov22-ws-UzFdOlAyUV0HYII9.pdf](http://www.arb.ca.gov/lists/com-attach/33-lcfs-wkshp-nov22-ws-UzFdOlAyUV0HYII9.pdf)

Original File Name: BAC Comments on LCFS Staff Proposal.pdf

Date and Time Comment Was Submitted: 2022-12-13 08:47:13

No Duplicates.

**Comment 28 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Don

Last Name: Gilstrap

Email Address: dgilstrap@chevron.com

Affiliation:

Subject: Chevron Comments on November 9 LCFS Workshop

Comment:

See enclosed comments

Attachment: [www.arb.ca.gov/lists/com-attach/34-lcfs-wkshp-nov22-ws-VDcBb1M3AyYBdQFu.pdf](http://www.arb.ca.gov/lists/com-attach/34-lcfs-wkshp-nov22-ws-VDcBb1M3AyYBdQFu.pdf)

Original File Name: Chevron Comments on November 9 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-12-15 11:06:03

No Duplicates.

**Comment 29 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Daniel  
Last Name: Chandler  
Email Address: dwchandl@gmail.com  
Affiliation: 350 Humboldt; CAC; North Group

Subject: Comments on avoided emissions of dairy gas/biomethane  
Comment:

Please see attached comments.  
Thank you for this opportunity to register our views with you early  
in the process.

Attachment: [www.arb.ca.gov/lists/com-attach/35-lcfs-wkshp-nov22-ws-UzAAZ1Q2VStWOAJ3.docx](http://www.arb.ca.gov/lists/com-attach/35-lcfs-wkshp-nov22-ws-UzAAZ1Q2VStWOAJ3.docx)

Original File Name: CAC-Humboldt-North Group Comment to LCFS on biomethane\_12\_14\_22.docx

Date and Time Comment Was Submitted: 2022-12-15 11:49:06

No Duplicates.

**Comment 30 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: John  
Last Name: O'Donnell  
Email Address: john@rondo.energy  
Affiliation: Rondo Energy

Subject: Rondo Energy Comments  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/36-lcfs-wkshp-nov22-ws-UGJTZ1xsVDVXYAI3.pdf](http://www.arb.ca.gov/lists/com-attach/36-lcfs-wkshp-nov22-ws-UGJTZ1xsVDVXYAI3.pdf)

Original File Name: 221215 Rondo LCFS November 9 Workshop Comments.pdf

Date and Time Comment Was Submitted: 2022-12-16 14:49:19

No Duplicates.



**Comment 31 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Greg

Last Name: Kester

Email Address: gkester@casaweb.org

Affiliation: California Assoc of Sanitation Agencies

Subject: Comments on LCFS Program

Comment:

Please find attached comments from the California Association of Sanitation Agencies (CASA) on proposed changes to the Low Carbon Fuel Standard program.

Attachment: [www.arb.ca.gov/lists/com-attach/37-lcfs-wkshp-nov22-ws-VmcFMV1xVjQFOgMu.pdf](http://www.arb.ca.gov/lists/com-attach/37-lcfs-wkshp-nov22-ws-VmcFMV1xVjQFOgMu.pdf)

Original File Name: 12-19-22 CASA LCFS Comment Letter[1].pdf

Date and Time Comment Was Submitted: 2022-12-19 07:20:18

No Duplicates.

**Comment 32 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jeremy

Last Name: Martin

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

Affiliation: Union of Concerned Scientists

Subject: Joint comments from UCS, CBE and APEN

Comment:

See attached for joint comments from the Union of Concerned Scientists, Communities for a Better Environment and Asian Pacific Environmental Network.

Attachment: [www.arb.ca.gov/lists/com-attach/38-lcfs-wkshp-nov22-ws-VjpcOVQzUnJWDwh4.pdf](http://www.arb.ca.gov/lists/com-attach/38-lcfs-wkshp-nov22-ws-VjpcOVQzUnJWDwh4.pdf)

Original File Name: LCFS Petroleum phaseout workshop.pdf

Date and Time Comment Was Submitted: 2022-12-19 08:31:37

No Duplicates.

**Comment 33 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Ira

Last Name: Dassa

Email Address: idassa@alderfuels.com

Affiliation:

Subject: Comments on November 9 Public Workshop

Comment:

Please see the attached for Alder Fuels' comments.

Attachment: [www.arb.ca.gov/lists/com-attach/39-lcfs-wkshp-nov22-ws-AWBRO1cyBTMAdABf.pdf](http://www.arb.ca.gov/lists/com-attach/39-lcfs-wkshp-nov22-ws-AWBRO1cyBTMAdABf.pdf)

Original File Name: Alder Fuels Comments-November 9 LCFS Workshop-12-19-22.pdf

Date and Time Comment Was Submitted: 2022-12-19 08:34:42

No Duplicates.

## **Comment 34 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Devin  
Last Name: Mogler  
Email Address: devin.mogler@gpreinc.com  
Affiliation: Green Plains Inc.

Subject: RE: LCFS Workshop Issue- Climate Smart Agriculture  
Comment:

Comments to CARB regarding potential changes to the Low Carbon Fuel Standard, specifically, a proposed cap on virgin oil feedstocks, and consideration of distillers corn oil as a virgin oil

Concern around the use of virgin oils as feedstock for the creation of biodiesel, renewable diesel and sustainable aviation fuel (SAF) stems from the fungibility of soy oil with palm oil for human consumption via fry cooking, consumer food products, etc... and concerns around decreasing supply of these edible oils and commensurate price increases (i.e. food price inflation). Distillers Corn Oil (DCO) does not compete in these markets in any way, as it is unfit for human consumption without additional refining.

The U.S. EPA defines DCO under the Renewable Fuel Standard (RFS) regulations as follows: "Distillers corn oil means corn oil recovered at any point downstream of when a dry mill ethanol or butanol plant grinds the corn, provided that the corn starch is converted to ethanol or butanol, the recovered oil is unfit for human food use without further refining, and the distillers grains remaining after the dry mill and oil recovery processes are marketable as animal feed."

Importantly, corn oil from wet mills is specifically excluded from qualifying as a feedstock and generating a RIN under the RFS solely because it is fit for human consumption without further refining. DCO from a dry mill is specifically approved because it is unfit for human use and does not degrade the quality of the resulting animal feed coproducts (e.g. distillers grains). Utilizing DCO and other inedible fats, oils and greases as feedstocks for renewable diesel, biodiesel and SAF should be encouraged, not limited.

CARB has strong track record supporting DCO as a low-CI, waste oil feedstock. Reclassifying DCO as a virgin oil, and either capping its use or changing how its CI is measured, would represent a stark reversal in policy. The LCFS has led to significant investments and a technology shift in the ethanol industry nationwide and an about face from CARB would undermine confidence in the program, and slow the state's progress in reaching their net zero goals.

Devin Mogler, on behalf of Green Plains Inc.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-12-19 11:18:00

No Duplicates.

**Comment 35 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: peter  
Last Name: colussy  
Email Address: peter.colussy@nexteraenergy.com  
Affiliation: NextEra Energy Resources

Subject: November LCFS workshop comments  
Comment:

Thank you for the opportunity to provide comments on the November LCFS workshop.

Sincerely,  
Peter Colussy

Attachment: [www.arb.ca.gov/lists/com-attach/41-lcfs-wkshp-nov22-ws-VjhTMFcuUnVQM1Qm.pdf](http://www.arb.ca.gov/lists/com-attach/41-lcfs-wkshp-nov22-ws-VjhTMFcuUnVQM1Qm.pdf)

Original File Name: NextEra Nov LCFS Workshop Comments 121922.pdf

Date and Time Comment Was Submitted: 2022-12-19 11:27:04

No Duplicates.

**Comment 36 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: MAN

Last Name: ALTAHER

Email Address: maltaher@smartchargetech.com

Affiliation: Smart Charging Technologies

Subject: Lineage comments to LCFS Potential changes Workshop 11.22.2022

Comment:

Lineage comments to LCFS Potential changes Workshop 11.22.2022

Attachment: [www.arb.ca.gov/lists/com-attach/42-lcfs-wkshp-nov22-ws-Uj4BblQ7VWNRNlcw.pdf](http://www.arb.ca.gov/lists/com-attach/42-lcfs-wkshp-nov22-ws-Uj4BblQ7VWNRNlcw.pdf)

Original File Name: Lineage CARB Letter.pdf

Date and Time Comment Was Submitted: 2022-12-19 15:02:08

No Duplicates.

## **Comment 37 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: NGVAmerica Comments on the CA LCFS Alternative Scenarios  
Comment:

Chair Randolph:

As stated in our attached comment letter, NGVAmerica strongly believes that RNG-operated low NOx vehicles must be a key component in the CARB LCFS program if emissions reductions are to occur in any reasonable timeframe. Alternative C of the LCFS alternatives makes no changes in the program, thereby allowing the current performance based assessment of fuels in the LCFS to be maintained to encourage and incentivize vehicles that operate on low and carbon negative fuels. This will also provide market certainty to those engaged in or planning avoided methane and RNG production projects. Statutory requirements are pressing on California and CARB needs solutions that work now to decarbonize and clean California's environment. Therefore, we request that RNG-operated low NOx trucks be prominent in CARB's strategies as an immediate pathway to a zero emission future.

Thank you for your consideration, and please contact me at smerrow@ngvamerica.org or 303.883.5121 with any comments or questions.

Sincerely,

Sherrie Merrow  
NGVAmerica State Government Affairs Director

Attachment: [www.arb.ca.gov/lists/com-attach/43-lcfs-wkshp-nov22-ws-VzIVNFYhVmQCaVM2.pdf](http://www.arb.ca.gov/lists/com-attach/43-lcfs-wkshp-nov22-ws-VzIVNFYhVmQCaVM2.pdf)

Original File Name: NGVAmerica Comments on CARB LCFS Alternative Scenarios - Dec 19 2022.pdf

Date and Time Comment Was Submitted: 2022-12-19 15:18:31

No Duplicates.



**Comment 38 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Margaret

Last Name: Laub

Email Address: margaret.laub@anaergia.com

Affiliation: Anaergia

Subject: Comments on Proposed LCFS Program Changes Presented at the November 9, 2022 Public Workshop  
Comment:

See attached document. Thank you for the opportunity to provide comment and your consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/45-lcfs-wkshp-nov22-ws-VjdcNFAwUmQCdII1.pdf](http://www.arb.ca.gov/lists/com-attach/45-lcfs-wkshp-nov22-ws-VjdcNFAwUmQCdII1.pdf)

Original File Name: Anaergia CARB LCFS Comments - 20221221 - FINAL.pdf

Date and Time Comment Was Submitted: 2022-12-19 16:20:29

No Duplicates.

## **Comment 39 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Devin  
Last Name: Mogler  
Email Address: devin.mogler@gpreinc.com  
Affiliation: Green Plains Inc.

Subject: RE: LCFS Workshop Issue- Climate Smart Agriculture  
Comment:

Comments to CARB regarding potential changes to the Low Carbon Fuel Standard, specifically, a proposed cap on virgin oil feedstocks, and consideration of distillers corn oil as a virgin oil

Concern around the use of virgin oils as feedstock for the creation of biodiesel, renewable diesel and sustainable aviation fuel (SAF) stems from the fungibility of soy oil with palm oil for human consumption via fry cooking, consumer food products, etc... and concerns around decreasing supply of these edible oils and commensurate price increases (i.e. food price inflation). Distillers Corn Oil (DCO) does not compete in these markets in any way, as it is unfit for human consumption without additional refining.

The U.S. EPA defines DCO under the Renewable Fuel Standard (RFS) regulations as follows: "Distillers corn oil means corn oil recovered at any point downstream of when a dry mill ethanol or butanol plant grinds the corn, provided that the corn starch is converted to ethanol or butanol, the recovered oil is unfit for human food use without further refining, and the distillers grains remaining after the dry mill and oil recovery processes are marketable as animal feed."

Importantly, corn oil from wet mills is specifically excluded from qualifying as a feedstock and generating a RIN under the RFS solely because it is fit for human consumption without further refining. DCO from a dry mill is specifically approved because it is unfit for human use and does not degrade the quality of the resulting animal feed coproducts (e.g. distillers grains).

Utilizing DCO and other inedible fats, oils and greases as feedstocks for renewable diesel, biodiesel and SAF should be encouraged, not limited.

CARB has strong track record supporting DCO as a low-CI, waste oil feedstock. Reclassifying DCO as a virgin oil, and either capping its use or changing how its CI is measured, would represent a stark reversal in policy. The LCFS has led to significant investments and a technology shift in the ethanol industry nationwide and an about face from CARB would undermine confidence in the program, and slow the state's progress in reaching their net zero goals.

Attachment: [www.arb.ca.gov/lists/com-attach/46-lcfs-wkshp-nov22-ws-WjkAZwNwBDUCWwdk.docx](http://www.arb.ca.gov/lists/com-attach/46-lcfs-wkshp-nov22-ws-WjkAZwNwBDUCWwdk.docx)

Original File Name: CARB Comments.docx

Date and Time Comment Was Submitted: 2022-12-20 08:20:42

No Duplicates.



**Comment 40 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: MAN  
Last Name: ALTAHER  
Email Address: maltaher@smartchargetech.com  
Affiliation: Smart Charging Technologies

Subject: Geodis JB comments to LCFS Potential changes Workshop 11.22.2022  
Comment:

Geodis JB

Attachment: [www.arb.ca.gov/lists/com-attach/47-lcfs-wkshp-nov22-ws-VTYHYABzV2YHLAhk.pdf](http://www.arb.ca.gov/lists/com-attach/47-lcfs-wkshp-nov22-ws-VTYHYABzV2YHLAhk.pdf)

Original File Name: CARB-Letter Supporting MHE Crediting - Geodis JB.pdf

Date and Time Comment Was Submitted: 2022-12-20 09:16:36

No Duplicates.

**Comment 41 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: MAN

Last Name: ALTAHER

Email Address: maltaher@smartchargetech.com

Affiliation: Smart Charging Technologies

Subject: Big Lots comments to LCFS Potential changes Workshop 11.22.2022

Comment:

Big Lots

Attachment: [www.arb.ca.gov/lists/com-attach/49-lcfs-wkshp-nov22-ws-VjVUM1ckWWgGLQVp.pdf](http://www.arb.ca.gov/lists/com-attach/49-lcfs-wkshp-nov22-ws-VjVUM1ckWWgGLQVp.pdf)

Original File Name: CARB-Letter Supporting MHE Crediting Big Lots.pdf

Date and Time Comment Was Submitted: 2022-12-20 09:16:36

No Duplicates.

**Comment 42 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: MAN  
Last Name: ALTAHER  
Email Address: maltaher@smartchargetech.com  
Affiliation: Smart Charging Technologies

Subject: JIT comments to LCFS Potential changes Workshop 11.22.2022  
Comment:

JIT

Attachment: [www.arb.ca.gov/lists/com-attach/50-lcfs-wkshp-nov22-ws-AmhRPgdyAAxXPQJn.pdf](http://www.arb.ca.gov/lists/com-attach/50-lcfs-wkshp-nov22-ws-AmhRPgdyAAxXPQJn.pdf)

Original File Name: JIT Letter in Support of eForklifts.pdf

Date and Time Comment Was Submitted: 2022-12-20 09:16:36

No Duplicates.

**Comment 43 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: MAN  
Last Name: ALTAHER  
Email Address: maltaher@smartchargetech.com  
Affiliation: Smart Charging Technologies

Subject: WPD comments to LCFS Potential changes Workshop 11.22.2022  
Comment:

WPD

Attachment: [www.arb.ca.gov/lists/com-attach/51-lcfs-wkshp-nov22-ws-VyACdARhAg4Kb1U0.pdf](http://www.arb.ca.gov/lists/com-attach/51-lcfs-wkshp-nov22-ws-VyACdARhAg4Kb1U0.pdf)

Original File Name: WPD CARB Letter.pdf

Date and Time Comment Was Submitted: 2022-12-20 09:16:36

No Duplicates.

**Comment 44 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Man

Last Name: Altaher

Email Address: [maltaher@smartchargetech.com](mailto:maltaher@smartchargetech.com)

Affiliation: Smart Charging Technologies

Subject: ONeill comments to LCFS Potential changes Workshop 11.22.2022

Comment:

O'Neill Comments

Attachment: [www.arb.ca.gov/lists/com-attach/52-lcfs-wkshp-nov22-ws-Am1ROVUxADoBa1c7.pdf](http://www.arb.ca.gov/lists/com-attach/52-lcfs-wkshp-nov22-ws-Am1ROVUxADoBa1c7.pdf)

Original File Name: ONeill Logistics - CARB Letter.pdf

Date and Time Comment Was Submitted: 2022-12-20 09:32:19

No Duplicates.



**Comment 45 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Miles

Last Name: Heller

Email Address: hellermt@airproducts.com

Affiliation: Air Products

Subject: November 9th LCFS Workshop Comments

Comment:

Air Products appreciates the opportunity to submit these comments.

Attachment: [www.arb.ca.gov/lists/com-attach/53-lcfs-wkshp-nov22-ws-AGFSPVEiVlpVIwNx.pdf](http://www.arb.ca.gov/lists/com-attach/53-lcfs-wkshp-nov22-ws-AGFSPVEiVlpVIwNx.pdf)

Original File Name: Air Products Comments November 9 2022 LCFS Workshop final.pdf

Date and Time Comment Was Submitted: 2022-12-20 10:41:58

No Duplicates.

**Comment 46 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Greg  
Last Name: Reading  
Email Address: greading@ushybrid.com  
Affiliation: US Hybrid

Subject: US Hybrid Comments on Alternative Pathway C  
Comment:

We at US Hybrid thank CARB for the opportunity to state our support for pathway C and expediting reduction of CI's. Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/54-lcfs-wkshp-nov22-ws-AndVIF0DADtXKAhq.pdf](http://www.arb.ca.gov/lists/com-attach/54-lcfs-wkshp-nov22-ws-AndVIF0DADtXKAhq.pdf)

Original File Name: US Hybrid comment letter CARB workshop signed.pdf

Date and Time Comment Was Submitted: 2022-12-20 11:37:12

No Duplicates.

**Comment 47 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Neil

Last Name: Koehler

Email Address: neil.koehler@kbe-llc.com

Affiliation: Renewable Fuels Association

Subject: RFA comments on Nov 9 LCFS workshop

Comment:

RFA comments attached

Attachment: [www.arb.ca.gov/lists/com-attach/55-lcfs-wkshp-nov22-ws-ViQCYIIyVloAagJh.pdf](http://www.arb.ca.gov/lists/com-attach/55-lcfs-wkshp-nov22-ws-ViQCYIIyVloAagJh.pdf)

Original File Name: RFA LCFS Comments\_ 122022.pdf

Date and Time Comment Was Submitted: 2022-12-20 12:05:27

No Duplicates.

**Comment 48 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Asher

Last Name: Goldman

Email Address: asherg@wharton.upenn.edu

Affiliation: Wharton School at UPenn

Subject: Proposal for Amendments to California LCFS Program

Comment:

Thank you taking the time to review the attached letter, and looking forward to working with Staff on any questions or regulatory design based on the recommendations contained herein.

Attachment: [www.arb.ca.gov/lists/com-attach/56-lcfs-wkshp-nov22-ws-Uj5QNVw7BCRVDAk.pdf](http://www.arb.ca.gov/lists/com-attach/56-lcfs-wkshp-nov22-ws-Uj5QNVw7BCRVDAk.pdf)

Original File Name: LCFS Comment Letter\_December 2022\_NNP.pdf

Date and Time Comment Was Submitted: 2022-12-20 12:11:20

No Duplicates.

**Comment 49 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Monte

Last Name: Shaw

Email Address: mshaw@iowarfa.org

Affiliation:

Subject: Comments to CARB regarding potential changes to the Low Carbon Fuel Standard  
Comment:

Looking at the proposed cap on virgin oil feedstocks, and consideration of distillers' corn oil as a virgin oil. Please see attachment for our comments.

Attachment: [www.arb.ca.gov/lists/com-attach/57-lcfs-wkshp-nov22-ws-BmVdOgZ1AjMGXwhr.pdf](http://www.arb.ca.gov/lists/com-attach/57-lcfs-wkshp-nov22-ws-BmVdOgZ1AjMGXwhr.pdf)

Original File Name: CARB Comments on Corn Oil.pdf

Date and Time Comment Was Submitted: 2022-12-20 13:02:10

No Duplicates.

**Comment 50 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: John

Last Name: Jones

Email Address: john.jones@fidelisinfra.com

Affiliation: Fidelis New Energy, LLC

Subject: Fidelis New Energy, LLC. Comments on Potential Changes to Low Carbon Fuel Standard  
Comment:

Please see the attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/58-lcfs-wkshp-nov22-ws-UDYAbwdiVGIHbVc+.pdf](http://www.arb.ca.gov/lists/com-attach/58-lcfs-wkshp-nov22-ws-UDYAbwdiVGIHbVc+.pdf)

Original File Name: Fidelis New Energy LLC Comments on LCFS Workshop 11 9 2022.pdf

Date and Time Comment Was Submitted: 2022-12-20 14:40:13

No Duplicates.

**Comment 51 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: John  
Last Name: Plaza  
Email Address: john@skynrg.com  
Affiliation:

Subject: SkyNRG Americas comments on Potential Changes to the LCFS Regulation  
Comment:

Dear California Air Resources Board Low Carbon Fuel Standard  
Program Staff:

Thank you for the opportunity to provide comments in response to  
the "Public Workshop to Discuss Potential Changes to the Low Carbon  
Fuel Standard" held November 9, 2022.

SkyNRG Americas is pleased to be able to provide comments on  
several areas of LCFS policy in the attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/59-lcfs-wkshp-nov22-ws-UCNXOlcvUm9VIVQz.pdf](http://www.arb.ca.gov/lists/com-attach/59-lcfs-wkshp-nov22-ws-UCNXOlcvUm9VIVQz.pdf)

Original File Name: SkyNRG Americas CARB LCFS Comments Final 12202022.pdf

Date and Time Comment Was Submitted: 2022-12-20 16:03:25

No Duplicates.

**Comment 52 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Lucille

Last Name: Cadic

Email Address: lucille.cadic@airliquide.com

Affiliation: Air Liquide

Subject: LCFS November 9 Workshop -- Biomethane

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/60-lcfs-wkshp-nov22-ws-BTcGMF1uWDlVflVk.pdf](http://www.arb.ca.gov/lists/com-attach/60-lcfs-wkshp-nov22-ws-BTcGMF1uWDlVflVk.pdf)

Original File Name: 2022-12-19 Low Carbon Fuel Standard Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-12-20 18:15:44

No Duplicates.



**Comment 53 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Suncheth

Last Name: Bhat

Email Address: suncheth@evrealtyus.com

Affiliation: EV Realty

Subject: EV Realty Comments on LCFS Workshop

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/61-lcfs-wkshp-nov22-ws-AGVdLVIMBCUEZ1Ax.pdf](http://www.arb.ca.gov/lists/com-attach/61-lcfs-wkshp-nov22-ws-AGVdLVIMBCUEZ1Ax.pdf)

Original File Name: EV Realty Comments on Nov 9 2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-12-20 18:23:07

No Duplicates.

## **Comment 54 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jack  
Last Name: Fleck  
Email Address: jack@350BayArea.org  
Affiliation: 350 Bay Area Transportation Team

Subject: Comments on LCFS workshop--November 9, 2022  
Comment:

December 20, 2022

Ms. Liane Randolph Chair,  
California Air Resource Board  
1001 I Street Sacramento, CA 95814  
RE: California Air Resources Board's Low Carbon Fuel Standard  
(LCFS) Public Workshop: Concepts and Tools for Compliance Target  
Modeling. November 9, 2022 public workshop.

Dear Ms Randolph, CARB Board, and CARB staff,

The CARB staff presentation on November 9 states, "CARB welcomes public input on alternatives to the initial modeled scenarios discussed in this workshop." The attached report provides an alternative based on electrification and clean hydrogen that accelerates EV adoption and stops any further adoption of biofuels or biomethane.

The staff presentation also asked for feedback on several points." This comment addresses two of these:

--Should the LCFS benchmarks be adjusted from 20% to a 25%, 30% or 35% decrease by 2030?  
--Should biofuels, including the plan for expanding biodiesel production, be restricted based on crops as feedstock, and use of blue hydrogen that uses carbon capture and fossil gas?

Table 6 in the report, attached as a pdf, answers these questions. It shows how the LCFS program could achieve 30% reduction in CI (from 100 to 69.1) without increasing biofuels from current levels, mostly by electrifying 10 million cars and 250,000 trucks by 2030. Biofuels are not needed and are potentially more harmful than beneficial; therefore, they should not be permitted to expand beyond existing facilities

10 million EVs by 2030 is not an unrealistic possibility. 250,000 ZEV trucks is taken from CARB's Mobile Source Strategy projections. The current trend of EV sales through the 3rd quarter of 2022 already predicts 8 million EVs by 2030 (see point 7 in the report's Addendum). And the additional funding from the National Electric Vehicle Infrastructure (NEVI) plan, the Inflation Reduction Act, and the State's 2021 budget surplus will all act to further stimulate EV sales. Also, LCFS subsidies for electrification of cars and trucks will grow as the EV fleet expands.

Table 7 in the report extends this trend of increasing electrification of cars and trucks. It shows that by 2035, the CI average for all fuels should drop to an estimated 36.5. This would nearly eliminate LCFS subsidies for biofuels if the CI for biodiesel, ethanol, and renewable diesel remain near their present levels, all of which are 28 or more. Given that the potential usefulness of biofuels is very short term, and given their serious

pollution impacts and conflict with food crops, CARB should stop the growth of biofuels and plan for their phase out.

To reiterate:

The LCFS program should set a goal of 30% reduction in the CI benchmark by 2030, and this goal can be met by electrifying transportation with clean energy. Biofuel volumes should be restricted based on crop use. No expansions beyond current levels should be allowed.

Sincerely,

Jack Lucero Fleck  
350 Bay Area Transportation Team  
PE Transportation

Attachment: [www.arb.ca.gov/lists/com-attach/62-lcfs-wkshp-nov22-ws-VztSO1EnU15XMIU0.pdf](http://www.arb.ca.gov/lists/com-attach/62-lcfs-wkshp-nov22-ws-VztSO1EnU15XMIU0.pdf)

Original File Name: Low Carbon Fuel Standards Program (LCFS) Analysis--12-16-22.pdf

Date and Time Comment Was Submitted: 2022-12-20 19:28:47

No Duplicates.

## **Comment 55 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Bernard Charles

Last Name: Fenner

Email Address: bernard.fenner@ductor.com

Affiliation:

Subject: Ductor Americas Inc - LCFS comments

Comment:

Thank you again for the opportunity to comment on the workshop. In summary, we support CARB maintaining a strong LCFS program so that it may continue serving as a driver of innovation and greenhouse gas reductions, including from pathways that will serve to address one of the most potent and intractable climate change challenges - N2O emissions. Accordingly, we encourage CARB to specifically:

- Propose and adopt carbon intensity reduction targets no less than those identified in Alternative C
- Consider a ratcheting mechanism to capture additional greenhouse gas reduction opportunities that may be available under the program
- Support California's access to RNG and replace imported fossil natural gas by continuing to allow book and claim accounting for projects anywhere in North America (as proposed in Alternative C)
- Ensure that avoided N2O emissions are allowed in the program, through at least 2045.
  - o Should CARB choose to limit avoided methane accounting in the future, as proposed in Alternatives A and B, make clear that avoided N2O will be included in the program.

We look forward to CARB formally kicking off the rulemaking process and continuing to participate in discussions about strengthening the LCFS. Please do not hesitate to reach out if you have any questions about Ductor or these comments.

Sincerely,

Bernard C. Fenner

CEO Ductor Corporation & President Ductor Americas, LLC

Attachment: [www.arb.ca.gov/lists/com-attach/63-lcfs-wkshp-nov22-ws-Wj5XJABiVXJXPgZ0.pdf](http://www.arb.ca.gov/lists/com-attach/63-lcfs-wkshp-nov22-ws-Wj5XJABiVXJXPgZ0.pdf)

Original File Name: Ductor Americas Inc - LCFS comments.pdf

Date and Time Comment Was Submitted: 2022-12-20 21:09:16

No Duplicates.

**Comment 56 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Andy  
Last Name: Foster  
Email Address: andy.foster@aemetis.com  
Affiliation: Aemetis, Inc.

Subject: Comment on Workshop on Methane, Dairies, Livestock and RNG  
Comment:

Please find attached comments from Aemetis, Inc.

Attachment: [www.arb.ca.gov/lists/com-attach/64-lcfs-wkshp-nov22-ws-AGFXNFwwV2EEEdghh.pdf](http://www.arb.ca.gov/lists/com-attach/64-lcfs-wkshp-nov22-ws-AGFXNFwwV2EEEdghh.pdf)

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

Date and Time Comment Was Submitted: 2022-12-20 23:12:10

No Duplicates.

**Comment 57 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: William  
Last Name: Faulkner  
Email Address: will@carbon-acumen.com  
Affiliation:

Subject: LCFS Auto-Ratchet Mechanism  
Comment:

Please see the attached letter. Let me know if you have any questions.

-Will Faulkner

Attachment: [www.arb.ca.gov/lists/com-attach/65-lcfs-wkshp-nov22-ws-WjlSNVAjVmdQOQBu.pdf](http://www.arb.ca.gov/lists/com-attach/65-lcfs-wkshp-nov22-ws-WjlSNVAjVmdQOQBu.pdf)

Original File Name: Carbon Acumen November 9, 2022 LCFS Workshop Comments.pdf

Date and Time Comment Was Submitted: 2022-12-21 00:48:48

No Duplicates.

**Comment 58 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Adam  
Last Name: Browning  
Email Address: [abrowning@forummobility.com](mailto:abrowning@forummobility.com)  
Affiliation: Forum Mobility

Subject: Forum Mobility Comments to Nov 9 2022 LCFS Workshop  
Comment:

Comment letter attached

Attachment: [www.arb.ca.gov/lists/com-attach/66-lcfs-wkshp-nov22-ws-AGZUPVIhUXdROlcI.pdf](http://www.arb.ca.gov/lists/com-attach/66-lcfs-wkshp-nov22-ws-AGZUPVIhUXdROlcI.pdf)

Original File Name: Forum Mobility Comments to 11\_9\_22 LCFS workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 02:12:06

No Duplicates.

**Comment 59 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Elizabeth

Last Name: Bourbon

Email Address: Elizabeth.Bourbon@valero.com

Affiliation:

Subject: Valero Comments on Nov 9 LCFS Workshop

Comment:

See attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/67-lcfs-wkshp-nov22-ws-V2VQZIVmWDkBWAU0.pdf](http://www.arb.ca.gov/lists/com-attach/67-lcfs-wkshp-nov22-ws-V2VQZIVmWDkBWAU0.pdf)

Original File Name: 2022 12 21 Valero Comments on LCFS Nov 9 2022 Workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 06:03:32

No Duplicates.



**Comment 60 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-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 Proces

Subject: Canola Council of Canada submission

Comment:

please find attached.

Attachment: [www.arb.ca.gov/lists/com-attach/68-lcfs-wkshp-nov22-ws-UzAGY1Y0VloAdQRx.pdf](http://www.arb.ca.gov/lists/com-attach/68-lcfs-wkshp-nov22-ws-UzAGY1Y0VloAdQRx.pdf)

Original File Name: CCC submission\_November 2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 06:35:11

No Duplicates.

**Comment 61 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: Neste Comments on Nov 9 LCFS Workshop  
Comment:

Neste is excited to submit the attached comments on the November 9, 2022 LCFS Workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/69-lcfs-wkshp-nov22-ws-BmhXNFMhU3QLaAdY.pdf](http://www.arb.ca.gov/lists/com-attach/69-lcfs-wkshp-nov22-ws-BmhXNFMhU3QLaAdY.pdf)

Original File Name: Neste\_November 9 LCFS Rulemaking Workshop Comments\_Dec 21 2022.pdf

Date and Time Comment Was Submitted: 2022-12-21 07:22:34

No Duplicates.

**Comment 62 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Karyn  
Last Name: Jones  
Email Address: kjones@gevo.com  
Affiliation:

Subject: Comments to Nov 9 LCFS Workshop  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/70-lcfs-wkshp-nov22-ws-VDNXNAF2BTkBWFQ4.docx](http://www.arb.ca.gov/lists/com-attach/70-lcfs-wkshp-nov22-ws-VDNXNAF2BTkBWFQ4.docx)

Original File Name: Gevo LCFS 11.9.22 Workshop Comments\_FINAL.docx

Date and Time Comment Was Submitted: 2022-12-21 07:59:42

No Duplicates.

**Comment 63 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: MAN

Last Name: ALTAHER

Email Address: maltaher@smartchargetech.com

Affiliation: Smart Charging Technologies

Subject: Ashley Furniture comments to LCFS Potential changes Workshop 11.22.2022

Comment:

Ashley Furniture comments to LCFS Potential changes Workshop  
11.22.2022

Attachment: [www.arb.ca.gov/lists/com-attach/71-lcfs-wkshp-nov22-ws-AmNXIII7V2gLaAF4.pdf](http://www.arb.ca.gov/lists/com-attach/71-lcfs-wkshp-nov22-ws-AmNXIII7V2gLaAF4.pdf)

Original File Name: Ashley Furniture\_CARB Letter.pdf

Date and Time Comment Was Submitted: 2022-12-21 08:26:02

No Duplicates.

**Comment 64 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: MAN  
Last Name: ALTAHER  
Email Address: maltaher@smartchargetech.com  
Affiliation: Smart Charging Technologies

Subject: Home Depot comments to LCFS Potential changes Workshop 11.22.2022  
Comment:

Home Depot comments to LCFS Potential changes Workshop 11.22.2022

Attachment: [www.arb.ca.gov/lists/com-attach/73-lcfs-wkshp-nov22-ws-UjoBaAdrVGIKUwFl.pdf](http://www.arb.ca.gov/lists/com-attach/73-lcfs-wkshp-nov22-ws-UjoBaAdrVGIKUwFl.pdf)

Original File Name: Home Depot CARB Letter.pdf

Date and Time Comment Was Submitted: 2022-12-21 08:44:03

No Duplicates.

**Comment 65 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Sam

Last Name: Wade

Email Address: sam@rngcoalition.com

Affiliation:

Subject: RNG Coalition Comments on Nov 2022 LCFS Workshop

Comment:

Please find our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/74-lcfs-wkshp-nov22-ws-U2FSZINjWThWYgMy.pdf](http://www.arb.ca.gov/lists/com-attach/74-lcfs-wkshp-nov22-ws-U2FSZINjWThWYgMy.pdf)

Original File Name: 221221 RNG Coalition Comments on Nov LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 08:48:14

No Duplicates.

**Comment 66 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: NCGA Comments to CARB on the November 9, 2022 LCFS Workshop  
Comment:

Attached, please find our comments on the November 9, 2022 LCFS Workshop. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/75-lcfs-wkshp-nov22-ws-BWsAZVYwVmRVDAZl.pdf](http://www.arb.ca.gov/lists/com-attach/75-lcfs-wkshp-nov22-ws-BWsAZVYwVmRVDAZl.pdf)

Original File Name: NCGA Comments to CARB\_November 9 2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 09:12:07

No Duplicates.

**Comment 67 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Krysta

Last Name: Wanner

Email Address: krysta@westernpga.org

Affiliation: Western Propane Gas Association

Subject: Low Carbon Fuel Standard – November Workshop

Comment:

See attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/76-lcfs-wkshp-nov22-ws-V2YFMVdkAmBVYVRm.pdf](http://www.arb.ca.gov/lists/com-attach/76-lcfs-wkshp-nov22-ws-V2YFMVdkAmBVYVRm.pdf)

Original File Name: 122122 LCFS Workshop Comment Letter WPGA.pdf

Date and Time Comment Was Submitted: 2022-12-21 09:43:58

No Duplicates.



**Comment 68 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jeff

Last Name: Wilkerson

Email Address: jeff@pearsonfuels.com

Affiliation: Pearson Fuels

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

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/77-lcfs-wkshp-nov22-ws-AXFXNANjV3YCdwBv.pdf](http://www.arb.ca.gov/lists/com-attach/77-lcfs-wkshp-nov22-ws-AXFXNANjV3YCdwBv.pdf)

Original File Name: Pearson Fuels LCFS Comments.pdf

Date and Time Comment Was Submitted: 2022-12-21 09:55:36

No Duplicates.

**Comment 69 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: Automated Landfill Control Technology Can Accelerate Methane Reductions  
Comment:

Dear Dr. Laskowski,

On behalf of Loci Controls, Inc. ("Loci"), I am writing to recommend that due to the shortfall identified in the Final 2022 Scoping Plan regarding short-lived climate pollutant ("SLCP") emission reductions, the California Air Resources Board ("CARB") should provide recognition to automated landfill monitoring and control technologies within the Low Carbon Fuel Standard program ("LCFS") to speed methane emissions from landfills. Loci recognizes CARB's ground-breaking work in quantifying fugitive methane emissions, and in deploying policy strategies to maximize the capture and upgrading of biogas so that it can be beneficially used as renewable natural gas ("RNG") to displace fossil natural gas. We appreciate the opportunity to provide this Comment.

Loci's full comment on these issues is attached. Please contact me if there are any issues or questions relating to the comment.

Best Regards,

Graham

Graham Noyes  
Noyes Law Corporation  
401 Spring Street, Suite 205  
Nevada City, CA 95959  
www.fuelandcarbonlaw.com  
(530)264-7157 Direct  
graham@noyeslawcorp.com

Attachment: [www.arb.ca.gov/lists/com-attach/78-lcfs-wkshp-nov22-ws-Uj5SOwRmWWNXDlc0.pdf](http://www.arb.ca.gov/lists/com-attach/78-lcfs-wkshp-nov22-ws-Uj5SOwRmWWNXDlc0.pdf)

Original File Name: Loci Controls CARB LCFS Comment 21 Dec 2022 Final.pdf

Date and Time Comment Was Submitted: 2022-12-21 10:17:26

No Duplicates.

## **Comment 70 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Dawn  
Last Name: Caldwell  
Email Address: dawnc@renewablefuelsne.org  
Affiliation: Renewable Fuels Nebraska

Subject: Comments to CARB regarding potential changes to the Low Carbon Fuel Standard  
Comment:

Specifically, a proposed cap on virgin oil feedstocks, and consideration of distillers corn oil as a virgin oil. Concern around the use of virgin oils as feedstock for the creation of biodiesel, renewable diesel and sustainable aviation fuel (SAF) stems from the fungibility of soy oil with palm oil for human consumption via fry cooking, consumer food products, etc... and concerns around decreasing supply of these edible oils and commensurate price increases (i.e. food price inflation). Distillers Corn Oil (DCO) does not compete in these markets in any way, as it is unfit for human consumption without additional refining.

The U.S. EPA defines DCO under the Renewable Fuel Standard (RFS) regulations as follows: "Distillers corn oil means corn oil recovered at any point downstream of when a dry mill ethanol or butanol plant grinds the corn, provided that the corn starch is converted to ethanol or butanol, the recovered oil is unfit for human food use without further refining, and the distillers grains remaining after the dry mill and oil recovery processes are marketable as animal feed."

Importantly, corn oil from wet mills is specifically excluded from qualifying as a feedstock and generating a RIN under the RFS solely because it is fit for human consumption without further refining. DCO from a dry mill is specifically approved because it is unfit for human use and does not degrade the quality of the resulting animal feed coproducts (e.g. distillers grains). Utilizing DCO and other inedible fats, oils and greases as feedstocks for renewable diesel, biodiesel and SAF should be encouraged, not limited.

CARB has strong track record supporting DCO as a low-CI, waste oil feedstock. Reclassifying DCO as a virgin oil, and either capping its use or changing how its CI is measured, would represent a stark reversal in policy. The LCFS has led to significant investments and a technology shift in the ethanol industry nationwide and an about face from CARB would undermine confidence in the program, and slow the state's progress in reaching their net zero goals.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-12-21 10:20:46

No Duplicates.

**Comment 71 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Tanya  
Last Name: DeRivi  
Email Address: tderivi@wspa.org  
Affiliation:

Subject: WSPA Comments on November 9 LCFS Workshop  
Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/80-lcfs-wkshp-nov22-ws-AHdcKVAhBzVRCAIq.pdf](http://www.arb.ca.gov/lists/com-attach/80-lcfs-wkshp-nov22-ws-AHdcKVAhBzVRCAIq.pdf)

Original File Name: WSPA CA LCFS 11-9-2022 Workshop Comment Letter 12-21-2022.pdf

Date and Time Comment Was Submitted: 2022-12-21 11:05:21

No Duplicates.

**Comment 72 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: David

Last Name: Hovermale

Email Address: dhovermale@nopa.org

Affiliation: National Oilseed Processors Association

Subject: NOPA Comments Regarding CARB November Workshop

Comment:

NOPA Comments Regarding CARB November Workshop

Attachment: [www.arb.ca.gov/lists/com-attach/81-lcfs-wkshp-nov22-ws-UD4AaVcmWGoEXQRb.pdf](http://www.arb.ca.gov/lists/com-attach/81-lcfs-wkshp-nov22-ws-UD4AaVcmWGoEXQRb.pdf)

Original File Name: NOPA\_ CARB Letter\_12-21-22.pdf

Date and Time Comment Was Submitted: 2022-12-21 11:04:50

No Duplicates.

**Comment 73 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Leticia

Last Name: Phillips

Email Address: leticia@unica.com.br

Affiliation: UNICA - Brazilian Sugarcane Industry Ass

Subject: UNICA comments to LCFS November 9, 2022 Workshop

Comment:

Please find attached UNICA's comments for the November 9, 2022 workshop.

Thank you for the opportunity to submit our input.

Leticia

Attachment: [www.arb.ca.gov/lists/com-attach/82-lcfs-wkshp-nov22-ws-Wz8GZVAyVmBQOwFj.pdf](http://www.arb.ca.gov/lists/com-attach/82-lcfs-wkshp-nov22-ws-Wz8GZVAyVmBQOwFj.pdf)

Original File Name: December 21, 20202 Comments to CARB - UNICA.pdf

Date and Time Comment Was Submitted: 2022-12-21 10:59:31

No Duplicates.

**Comment 74 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: John  
Last Name: Strom  
Email Address: kcoronado@hvllc.com  
Affiliation:

Subject: Comments on Potential LCFS Changes  
Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/com-attach/83-lcfs-wkshp-nov22-ws-ViBTZ1Z6VGMEZwNg.pdf](http://www.arb.ca.gov/lists/com-attach/83-lcfs-wkshp-nov22-ws-ViBTZ1Z6VGMEZwNg.pdf)

Original File Name: V2-Dec 9 DRAFT Comments on Potential LCFS Changes[1].pdf

Date and Time Comment Was Submitted: 2022-12-21 11:36:24

No Duplicates.

## **Comment 75 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: ICCT Technical Comments on Potential Changes to the LCFS  
Comment:

The attached set of technical public 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 November workshop to discuss potential changes to the Low-Carbon Fuel Standard. We commend the agency for its technical analysis and interest in continuing to improve the effectiveness of one of its flagship climate programs. Based on the content of the workshop, the comments below offer a number of technical observations and recommendations for ARB to consider in future changes to the Low-Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/84-lcfs-wkshp-nov22-ws-B2lQOVAnVVkEMAc3.pdf](http://www.arb.ca.gov/lists/com-attach/84-lcfs-wkshp-nov22-ws-B2lQOVAnVVkEMAc3.pdf)

Original File Name: Nov\_2022 Comments\_0.3\_NP.pdf

Date and Time Comment Was Submitted: 2022-12-21 11:39:52

No Duplicates.



**Comment 76 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jay  
Last Name: Riker  
Email Address: jriker@nlcenergy.com  
Affiliation: NLC Energy

Subject: Comments in Response to the November 9th Public Workshop to Discuss Potential Changes to t  
Comment:

Please see attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/85-lcfs-wkshp-nov22-ws-UTJRNIckBzYFXFVn.pdf](http://www.arb.ca.gov/lists/com-attach/85-lcfs-wkshp-nov22-ws-UTJRNIckBzYFXFVn.pdf)

Original File Name: CARB 2022 Letter response to 2023 changes.pdf

Date and Time Comment Was Submitted: 2022-12-21 11:51:09

No Duplicates.

**Comment 77 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: David  
Last Name: Oliver  
Email Address: david@caliberstrat.com  
Affiliation: Caliber Strat

Subject: Remora Comments on November 9, 2022, LCFS Workshop  
Comment:

Remora is pleased to submit thee attached comments for the Low Carbon Fuel Standard workshop of November 9, 2022.

Attachment: [www.arb.ca.gov/lists/com-attach/86-lcfs-wkshp-nov22-ws-VWRVYVR7WTgDNFV7.pdf](http://www.arb.ca.gov/lists/com-attach/86-lcfs-wkshp-nov22-ws-VWRVYVR7WTgDNFV7.pdf)

Original File Name: 12.21.2022 Remora 3rd LCFS Workshop Comments.pdf

Date and Time Comment Was Submitted: 2022-12-21 12:01:02

No Duplicates.

**Comment 78 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Nora

Last Name: Cohen Brown

Email Address: Shayla@caliberstrat.com

Affiliation: Charm Industrial

Subject: Charm's Comments to LCFS Workshop

Comment:

Hello,

Please see Charm's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/87-lcfs-wkshp-nov22-ws-BzYGMgEuBWQGMVV7.pdf](http://www.arb.ca.gov/lists/com-attach/87-lcfs-wkshp-nov22-ws-BzYGMgEuBWQGMVV7.pdf)

Original File Name: 12.21.2022 LCFS Workshop Comments.docx.pdf

Date and Time Comment Was Submitted: 2022-12-21 11:57:14

No Duplicates.

**Comment 79 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: Tesla Comments on 11/9/22 LCFS Workshop  
Comment:

Please accept the attached comments on the November 9th workshop on behalf of Tesla.

Attachment: [www.arb.ca.gov/lists/com-attach/88-lcfs-wkshp-nov22-ws-W2lQZAEuUzJVYQIz.pdf](http://www.arb.ca.gov/lists/com-attach/88-lcfs-wkshp-nov22-ws-W2lQZAEuUzJVYQIz.pdf)

Original File Name: 221221 Tesla FINAL LCFS Comments re 11-09 workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 12:15:52

No Duplicates.

**Comment 80 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Gary

Last Name: Kay

Email Address: gary\_kay@cargill.com

Affiliation: Cargill, Inc.

Subject: Cargill comments to CARB on November 9, 2022 LCFS Workshop

Comment:

Good afternoon,

Thank you for the opportunity to provide additional feedback on potential changes to the low carbon fuel standard. Attached are comments on behalf of Cargill, Inc.

Best regards,

Gary Kay

Director, Government Relations

Attachment: [www.arb.ca.gov/lists/com-attach/89-lcfs-wkshp-nov22-ws-B2RWMVYIVGADbFA8.pdf](http://www.arb.ca.gov/lists/com-attach/89-lcfs-wkshp-nov22-ws-B2RWMVYIVGADbFA8.pdf)

Original File Name: Cargill comments to CARB\_12.22\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-12-21 11:47:55

No Duplicates.

## **Comment 81 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Simon

Last Name: Brandler

Email Address: [simon@brimstone.energy](mailto:simon@brimstone.energy)

Affiliation:

Subject: Brimstone comments on Nov. 9 LCFS workshop

Comment:

Please find attached our comments on the November 9 workshop. We support amendments to the program that align with the State's climate neutrality goals and maintain a strong and consistent market signal to drive continued innovation around climate change solutions, including mineralization as a carbon removal strategy. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/90-lcfs-wkshp-nov22-ws-VDZTJ1Y+UmwDdlQg.pdf](http://www.arb.ca.gov/lists/com-attach/90-lcfs-wkshp-nov22-ws-VDZTJ1Y+UmwDdlQg.pdf)

Original File Name: Brimstone LCFS Workshop Letter\_November 2022 workshop\_12.21.22.pdf

Date and Time Comment Was Submitted: 2022-12-21 12:30:40

No Duplicates.

**Comment 82 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Michael

Last Name: Boccadoro

Email Address: mboccadoro@westcoastadvisors.com

Affiliation: Agricultural Energy Consumers Assoc

Subject: Ag Energy Consumers Assoc comments on 11/9 LCFS workshop

Comment:

Comments attached

Attachment: [www.arb.ca.gov/lists/com-attach/91-lcfs-wkshp-nov22-ws-AWJWMVwvVWQGXwFt.pdf](http://www.arb.ca.gov/lists/com-attach/91-lcfs-wkshp-nov22-ws-AWJWMVwvVWQGXwFt.pdf)

Original File Name: CARB LCFS workshop\_AECA (Dec 22).pdf

Date and Time Comment Was Submitted: 2022-12-21 12:56:00

No Duplicates.

**Comment 83 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jeremy

Last Name: Martin

Email Address: jmartin@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: UCS Comments 1 of 3 on Petroleum Phaseout

Comment:

See attached comment

Attachment: [www.arb.ca.gov/lists/com-attach/92-lcfs-wkshp-nov22-ws-BnNTNgZ0BQlXIQdi.pdf](http://www.arb.ca.gov/lists/com-attach/92-lcfs-wkshp-nov22-ws-BnNTNgZ0BQlXIQdi.pdf)

Original File Name: UCS Petroleum phaseout comments for November 2022 LCFS workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 13:03:30

No Duplicates.



**Comment 84 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jeremy

Last Name: Martin

Email Address: jmartin@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: UCS Comments 2 of 3 on feedstock safeguards

Comment:

See attached comment

Attachment: [www.arb.ca.gov/lists/com-attach/93-lcfs-wkshp-nov22-ws-UCVVMAS0VVkKblM6.pdf](http://www.arb.ca.gov/lists/com-attach/93-lcfs-wkshp-nov22-ws-UCVVMAS0VVkKblM6.pdf)

Original File Name: UCS Biofuel feedstock comments for November 2022 LCFS workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 13:03:30

No Duplicates.

**Comment 85 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jeremy  
Last Name: Martin  
Email Address: jmartin@ucsusa.org  
Affiliation: Union of Concerned Scientists

Subject: UCS Comments 3 of 3 on avoided methane credits  
Comment:

See attached comment

Attachment: [www.arb.ca.gov/lists/com-attach/94-lcfs-wkshp-nov22-ws-ViNQNQFzAAxXPAJn.pdf](http://www.arb.ca.gov/lists/com-attach/94-lcfs-wkshp-nov22-ws-ViNQNQFzAAxXPAJn.pdf)

Original File Name: UCS Methane Comments for November 2022 LCFS workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 13:03:30

No Duplicates.

**Comment 86 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: O'Brien

Email Address: rebeccaobrien@tnrenewableenergy.com

Affiliation: True North Renewable Energy

Subject: TNRE comments on LCFS workshop

Comment:

Please find our comments attached. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/95-lcfs-wkshp-nov22-ws-VCBSOgd0ADYKU1c7.pdf](http://www.arb.ca.gov/lists/com-attach/95-lcfs-wkshp-nov22-ws-VCBSOgd0ADYKU1c7.pdf)

Original File Name: TNRE LCFS Nov 9 Workshop Comment Letter.pdf

Date and Time Comment Was Submitted: 2022-12-21 13:07:49

No Duplicates.

**Comment 87 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jennifer  
Last Name: LeRow  
Email Address: jlerow@brayafuels.com  
Affiliation: Braya Renewable Fuels

Subject: Braya Comments to CARB RE Proposed Changes to the LCFS\_2022.12.21  
Comment:

Dear Dr. Laskowski,

Thank you in advance for reviewing our attached feedback and for the opportunity.

Jennifer M. LeRow  
Director of Regulatory Compliance  
Braya Renewable Fuels

Attachment: [www.arb.ca.gov/lists/com-attach/96-lcfs-wkshp-nov22-ws-UjBQJAZmUXsHYAhX.docx](http://www.arb.ca.gov/lists/com-attach/96-lcfs-wkshp-nov22-ws-UjBQJAZmUXsHYAhX.docx)

Original File Name: Braya Comments to CARB RE Proposed Changes to the LCFS\_2022.12.21.docx

Date and Time Comment Was Submitted: 2022-12-21 13:12:05

No Duplicates.

**Comment 88 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Per

Last Name: Lundmark

Email Address: plundmark@rpmgllc.com

Affiliation: RPMG

Subject: RPMG Comments on the 11.9.2022 LCFS Workshop

Comment:

Attached file includes RPMG Comments on the 11.9.2022 LCFS Workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/97-lcfs-wkshp-nov22-ws-BXcBdwFtBzMFXAZl.pdf](http://www.arb.ca.gov/lists/com-attach/97-lcfs-wkshp-nov22-ws-BXcBdwFtBzMFXAZl.pdf)

Original File Name: RPMG Comment Letter - Nov 9 2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 13:27:42

No Duplicates.

**Comment 89 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Donna  
Last Name: Schempp  
Email Address: dschempp@sjindustries.com  
Affiliation:

Subject: SJI Response to 11/9 Workshop  
Comment:

See attached document for SJI's Response to CARB's 11/9 Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard. Thank you for the opportunity to comment.

Attachment: [www.arb.ca.gov/lists/com-attach/98-lcfs-wkshp-nov22-ws-ViVQPFY+V1sFcQNm.pdf](http://www.arb.ca.gov/lists/com-attach/98-lcfs-wkshp-nov22-ws-ViVQPFY+V1sFcQNm.pdf)

Original File Name: SJI Response to CARB Workshop Final Signed.pdf

Date and Time Comment Was Submitted: 2022-12-21 13:27:26

No Duplicates.

**Comment 90 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Annie

Last Name: Gileo

Email Address: annie@theadhocgroup.com

Affiliation: Carbon Removal Buyers and Sellers

Subject: Comments in Response to November 9, 2022 Public Workshop to Discuss Potential Changes to t  
Comment:

Please see the attached letter from Carbon Removal Buyers and  
Sellers.

Attachment: [www.arb.ca.gov/lists/com-attach/99-lcfs-wkshp-nov22-ws-VDdRJVc3WFQCaAZl.pdf](http://www.arb.ca.gov/lists/com-attach/99-lcfs-wkshp-nov22-ws-VDdRJVc3WFQCaAZl.pdf)

Original File Name: CRA LCFS Letter - Dec 2022 (1).pdf

Date and Time Comment Was Submitted: 2022-12-21 13:33:28

No Duplicates.

## **Comment 91 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jordan  
Last Name: Flanagan  
Email Address: jflanagan@ajw-inc.com  
Affiliation:

Subject: Comments in Response to the November 9th LCFS Public Workshop  
Comment:

Hi,

I am submitting comments on behalf of Anew Climate, DTE Vantage, Iogen Corp., and Opal Fuels in response to the Nov. 9th public workshop to discuss potential changes to the Low Carbon Fuel Standard. Please let us know if you have any questions or request clarification on any points made.

Thank you,  
Jordan

Attachment: [www.arb.ca.gov/lists/com-attach/100-lcfs-wkshp-nov22-ws-UGJSZgc3BGVXY1Ni.pdf](http://www.arb.ca.gov/lists/com-attach/100-lcfs-wkshp-nov22-ws-UGJSZgc3BGVXY1Ni.pdf)

Original File Name: 221221\_RNG Companies Response to LCFS Workshop\_Final Version for Submission.pdf

Date and Time Comment Was Submitted: 2022-12-21 13:13:47

No Duplicates.



**Comment 92 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Stephen  
Last Name: Soule  
Email Address: srs@revlng.com  
Affiliation: REV LNG LLC

Subject: REV LNG Response to CARB 11.09.2022 Workshop on LCFS  
Comment:

Letter response would not upload so it was emailed to the Clerk of the Board.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-12-21 13:43:12

No Duplicates.

**Comment 93 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Bonnie  
Last Name: Trowbridge  
Email Address: btrowbridge@zeemsolutions.com  
Affiliation: Zeem Solutions

Subject: Re: Potential Future Changes to the LCFS Program  
Comment:

See comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/102-lcfs-wkshp-nov22-ws-AjBUYFBgWDkHMwg5.pdf](http://www.arb.ca.gov/lists/com-attach/102-lcfs-wkshp-nov22-ws-AjBUYFBgWDkHMwg5.pdf)

Original File Name: 221221\_LCFSCComments\_ZeemSolutions.pdf

Date and Time Comment Was Submitted: 2022-12-21 13:43:17

No Duplicates.

**Comment 94 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: James  
Last Name: Duffy  
Email Address: duffje@msn.com  
Affiliation: No affiliation

Subject: Comments on November 2022 LCFS Workshop  
Comment:

See attached comment letter

Attachment: [www.arb.ca.gov/lists/com-attach/104-lcfs-wkshp-nov22-ws-Wj4BclE2UGUCfVMM.pdf](http://www.arb.ca.gov/lists/com-attach/104-lcfs-wkshp-nov22-ws-Wj4BclE2UGUCfVMM.pdf)

Original File Name: Duffy\_LCFS\_12-21-2022.pdf

Date and Time Comment Was Submitted: 2022-12-21 14:00:03

No Duplicates.

**Comment 95 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Brian

Last Name: McDonald

Email Address: bcmcdonald@marathonpetroleum.com

Affiliation: MPC

Subject: Comments to LCFS workshop

Comment:

See attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/105-lcfs-wkshp-nov22-ws-UD0HcVAyAAwBZFM8.pdf](http://www.arb.ca.gov/lists/com-attach/105-lcfs-wkshp-nov22-ws-UD0HcVAyAAwBZFM8.pdf)

Original File Name: MPC comments to 11.9.22 CARB LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 14:06:42

No Duplicates.

**Comment 96 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: World Energy Comments on the November 9 LCFS Workshop  
Comment:

Attached please find our comments. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/106-lcfs-wkshp-nov22-ws-AHdUPQZ1Aj0FZ1cI.pdf](http://www.arb.ca.gov/lists/com-attach/106-lcfs-wkshp-nov22-ws-AHdUPQZ1Aj0FZ1cI.pdf)

Original File Name: World Energy Comments on Nov. 9 2022 LCFS Public Workshop .pdf

Date and Time Comment Was Submitted: 2022-12-21 14:07:06

No Duplicates.

**Comment 97 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: 3Degrees' Comments on November 2022 LCFS Workshop  
Comment:

Please find 3Degrees' comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/108-lcfs-wkshp-nov22-ws-VGdWNFQwAzdQJAVg.pdf](http://www.arb.ca.gov/lists/com-attach/108-lcfs-wkshp-nov22-ws-VGdWNFQwAzdQJAVg.pdf)

Original File Name: 3Degrees December 2022 Comments on LCFS.pdf

Date and Time Comment Was Submitted: 2022-12-21 14:13:14

No Duplicates.

**Comment 98 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Debbie  
Last Name: Meeks  
Email Address: [deborah.meeks@shell.com](mailto:deborah.meeks@shell.com)  
Affiliation: Shell USA, Inc

Subject: Shell Comments on Nov 9th CARB Workshop on Potential Changes to LCFS  
Comment:

Dear California Air Resources Board:

Please find attached Shell USA, Inc's comments regarding the Nov 9th Workshop on the Potential Changes to the Low Carbon Fuel Standard.

Regards,  
Debbie Meeks

Deborah C Meeks  
Manager - US West Coast Policy and Business Coordination  
Shell USA, Inc.  
[deborah.meeks@shell.com](mailto:deborah.meeks@shell.com)

Attachment: [www.arb.ca.gov/lists/com-attach/110-lcfs-wkshp-nov22-ws-UCNSPFE1VGsBa1QL.pdf](http://www.arb.ca.gov/lists/com-attach/110-lcfs-wkshp-nov22-ws-UCNSPFE1VGsBa1QL.pdf)

Original File Name: Shell LCFS comment letter\_Final.pdf

Date and Time Comment Was Submitted: 2022-12-21 14:12:42

No Duplicates.

**Comment 99 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: David

Last Name: Hovermale

Email Address: [dhovermale@nopa.org](mailto:dhovermale@nopa.org)

Affiliation: National Oilseed Processors Association

Subject: NOPA Comments Regarding CARB November Workshop

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/111-lcfs-wkshp-nov22-ws-BWtROAd2U2FSC1AP.pdf](http://www.arb.ca.gov/lists/com-attach/111-lcfs-wkshp-nov22-ws-BWtROAd2U2FSC1AP.pdf)

Original File Name: NOPA\_ CARB Letter\_12-21-22.pdf

Date and Time Comment Was Submitted: 2022-12-21 14:19:29

No Duplicates.



**Comment 100 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Anthony

Last Name: Harrison

Email Address: anthony@terawattinfrastructure.com

Affiliation: TeraWatt Infrastructure

Subject: TeraWatt's Comments on FCI Pathway for Medium and Heavy-Duty Vehicles

Comment:

Please find the attached comments of TeraWatt Infrastructure on the implementation of FCI mechanism for fleet vehicles.

Attachment: [www.arb.ca.gov/lists/com-attach/112-lcfs-wkshp-nov22-ws-UiZVNIUmWWsHdlAx.pdf](http://www.arb.ca.gov/lists/com-attach/112-lcfs-wkshp-nov22-ws-UiZVNIUmWWsHdlAx.pdf)

Original File Name: TeraWatt LCFS Comments 12212022.pdf

Date and Time Comment Was Submitted: 2022-12-21 14:21:00

No Duplicates.

## **Comment 101 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Caelin

Last Name: MacIntosh

Email Address: cmacintosh@ajw-inc.com

Affiliation:

Subject: Stakeholder Comment Letter on Accelerating the LCFS

Comment:

Attached please find a comment letter with signatures from 53 different organizations asking CARB to accelerate the stringency of the LCFS. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/113-lcfs-wkshp-nov22-ws-WmhTZwY2VzYBNVBh.pdf](http://www.arb.ca.gov/lists/com-attach/113-lcfs-wkshp-nov22-ws-WmhTZwY2VzYBNVBh.pdf)

Original File Name: 221221 Group Letter to CARB - Acceleration Mechanism - Final.pdf

Date and Time Comment Was Submitted: 2022-12-21 14:10:46

No Duplicates.

**Comment 102 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Chad

Last Name: Frahm

Email Address: chad.frahm@brightmark.com

Affiliation: Brightmark

Subject: Brightmark comments to CARB LCFS Nov 9th workshop

Comment:

Brightmark comments to CARB LCFS Nov 9th workshop attached below.

Attachment: [www.arb.ca.gov/lists/com-attach/114-lcfs-wkshp-nov22-ws-AWNTJ1Y+BTFVO1Qg.pdf](http://www.arb.ca.gov/lists/com-attach/114-lcfs-wkshp-nov22-ws-AWNTJ1Y+BTFVO1Qg.pdf)

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

Date and Time Comment Was Submitted: 2022-12-21 14:30:27

No Duplicates.

**Comment 103 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Laura  
Last Name: Berland-Shane  
Email Address: laura@blueplanetsystems.com  
Affiliation: Blue Planet

Subject: Blue Planet comments on LCFS workshop  
Comment:

Please find comments attached. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/115-lcfs-wkshp-nov22-ws-WzkBa1UhV2EGXwBw.pdf](http://www.arb.ca.gov/lists/com-attach/115-lcfs-wkshp-nov22-ws-WzkBa1UhV2EGXwBw.pdf)

Original File Name: Blue Planet November 2022 LCFS workshop comments 122122.pdf

Date and Time Comment Was Submitted: 2022-12-21 14:33:06

No Duplicates.

**Comment 104 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Brad

Last Name: Wilson

Email Address: BWilson@westerniowaenergy.com

Affiliation:

Subject: WIE/Agron Comments - Public Workshop to Discuss Potential Changes to the LCFS  
Comment:

Please see uploaded comment letter in PDF format.

Attachment: [www.arb.ca.gov/lists/com-attach/116-lcfs-wkshp-nov22-ws-BnFSPVUxWScKbQdg.pdf](http://www.arb.ca.gov/lists/com-attach/116-lcfs-wkshp-nov22-ws-BnFSPVUxWScKbQdg.pdf)

Original File Name: WIE-Agron Comment Letter - Public Workshop to Discuss Potential Changes to the LCFS.pdf

Date and Time Comment Was Submitted: 2022-12-21 14:34:27

No Duplicates.

**Comment 105 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Joe

Last Name: Gershen

Email Address: joegershen@EncoreBioRenewables.com

Affiliation: Encore BioRenewables LLC

Subject: EncoreBioRenewables Comments - Public Workshop to Discuss Potential Changes to the LCFS  
Comment:

Please see uploaded comment letter in PDF format.

Attachment: [www.arb.ca.gov/lists/com-attach/117-lcfs-wkshp-nov22-ws-Wz5QOAFjBTIVIVM2.pdf](http://www.arb.ca.gov/lists/com-attach/117-lcfs-wkshp-nov22-ws-Wz5QOAFjBTIVIVM2.pdf)

Original File Name: EncoreBioRenewables Comment Letter - Public Workshop to Discuss Potential Changes to the LCFS.pdf

Date and Time Comment Was Submitted: 2022-12-21 14:34:27

No Duplicates.

**Comment 106 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: POET's Comments to LCFS Workshop  
Comment:

Please find POET's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/118-lcfs-wkshp-nov22-ws-UzUHFM8AzEFb1cI.pdf](http://www.arb.ca.gov/lists/com-attach/118-lcfs-wkshp-nov22-ws-UzUHFM8AzEFb1cI.pdf)

Original File Name: Final POET 12.21.2022 LCFS Comments.pdf

Date and Time Comment Was Submitted: 2022-12-21 15:08:47

No Duplicates.

**Comment 107 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Andrew

Last Name: Craig

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

Affiliation: California Bioenergy

Subject: CalBio Comments to Nov 9, 2022 LCFS Workshop

Comment:

Thank you for the opportunity to comment on this workshop. Please see CalBio's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/119-lcfs-wkshp-nov22-ws-VjVSNQRpAjNXOABv.pdf](http://www.arb.ca.gov/lists/com-attach/119-lcfs-wkshp-nov22-ws-VjVSNQRpAjNXOABv.pdf)

Original File Name: CalBio Comments 12-2022 LCFS workshop Final.pdf

Date and Time Comment Was Submitted: 2022-12-21 15:25:33

No Duplicates.



## **Comment 108 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jordan  
Last Name: Flanagan  
Email Address: jflanagan@ajw-inc.com  
Affiliation:

Subject: Comments in Response to the November 9th LCFS Public Workshop  
Comment:

Hi,

I am submitting comments on behalf of Anew Climate, DTE Vantage, Energy Power Partners, Iogen Corp., and Opal Fuels in response to the Nov. 9th public workshop to discuss potential changes to the Low Carbon Fuel Standard program. Please let us know if you have any questions or would like us to clarify any points made.

Thanks,  
Jordan

Attachment: [www.arb.ca.gov/lists/com-attach/120-lcfs-wkshp-nov22-ws-AjBWYgQ0VTQGMgk4.pdf](http://www.arb.ca.gov/lists/com-attach/120-lcfs-wkshp-nov22-ws-AjBWYgQ0VTQGMgk4.pdf)

Original File Name: 221221\_RNG Companies Response to LCFS Workshop\_Final Version for Submission\_updated.pdf

Date and Time Comment Was Submitted: 2022-12-21 15:38:54

No Duplicates.

**Comment 109 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Phoebe

Last Name: Seaton

Email Address: pseaton@leadershipcounsel.org

Affiliation: Leadership Counsel for Justice and Accou

Subject: Coalition Comments Re 11.9.2022 LCFS Workshop

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/121-lcfs-wkshp-nov22-ws-AmFdNFU5VmgLaFQ6.pdf](http://www.arb.ca.gov/lists/com-attach/121-lcfs-wkshp-nov22-ws-AmFdNFU5VmgLaFQ6.pdf)

Original File Name: Comments Re 11.9.2022 LCFS Workshop .pdf

Date and Time Comment Was Submitted: 2022-12-21 15:43:54

No Duplicates.

**Comment 110 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Stanley

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/122-lcfs-wkshp-nov22-ws-UDEAdAZIBwtVPwNg.pdf](http://www.arb.ca.gov/lists/com-attach/122-lcfs-wkshp-nov22-ws-UDEAdAZIBwtVPwNg.pdf)

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

Date and Time Comment Was Submitted: 2022-12-21 15:59:03

No Duplicates.

**Comment 111 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: David  
Last Name: Hovermale  
Email Address: dhovermale@nopa.org  
Affiliation: DC

Subject: NOPA Comments Regarding CARB November Workshop  
Comment:

Comments to CARB on the November 9, 2022 LCFS Workshop

Attachment: [www.arb.ca.gov/lists/com-attach/123-lcfs-wkshp-nov22-ws-UD4Gb1cmBzUBWFQL.pdf](http://www.arb.ca.gov/lists/com-attach/123-lcfs-wkshp-nov22-ws-UD4Gb1cmBzUBWFQL.pdf)

Original File Name: NOPA\_ CARB Letter\_12-21-22.pdf

Date and Time Comment Was Submitted: 2022-12-21 15:58:58

No Duplicates.

**Comment 112 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Patrick

Last Name: Serfass

Email Address: [info@americanbiogascouncil.org](mailto:info@americanbiogascouncil.org)

Affiliation: American Biogas Council

Subject: American Biogas Council Comments re: CARB's November 9, 2022 Public Workshop  
Comment:

Please see the attached comment letter from ABC. Should the letter not transmit for any reason, please let us know and we will re-send it.

Attachment: [www.arb.ca.gov/lists/com-attach/124-lcfs-wkshp-nov22-ws-VjcAZAZkV1sBZAVq.pdf](http://www.arb.ca.gov/lists/com-attach/124-lcfs-wkshp-nov22-ws-VjcAZAZkV1sBZAVq.pdf)

Original File Name: ABC Comments to CARB in re November 2022 Public Workshop Dec 2022.pdf

Date and Time Comment Was Submitted: 2022-12-21 15:57:38

No Duplicates.

**Comment 113 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Cassandra

Last Name: Farrant

Email Address: cfarrant@ampamericas.com

Affiliation: Amp Americas

Subject: Comments on the November 9, 2022, Public Workshop to Potential Changes to the LCFS  
Comment:

Amp America appreciates the opportunity to submit comments in response to the November 9, 2022, Public Workshop to Discuss Potential Changes to the LCFS. Please see our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/125-lcfs-wkshp-nov22-ws-VzZcN1EgAg5QOghr.pdf](http://www.arb.ca.gov/lists/com-attach/125-lcfs-wkshp-nov22-ws-VzZcN1EgAg5QOghr.pdf)

Original File Name: Amp LCFS November 2022 Workshop Comment Letter vF.pdf

Date and Time Comment Was Submitted: 2022-12-21 16:08:54

No Duplicates.

**Comment 114 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Evan  
Last Name: Neyland  
Email Address: evan.neyland@chargepoint.com  
Affiliation: ChargePoint

Subject: ChargePoint comment to Nov 9 2022 LCFS workshop  
Comment:

Comments attached as pdf

Attachment: [www.arb.ca.gov/lists/com-attach/126-lcfs-wkshp-nov22-ws-UzBXOQRkWHkFZARh.pdf](http://www.arb.ca.gov/lists/com-attach/126-lcfs-wkshp-nov22-ws-UzBXOQRkWHkFZARh.pdf)

Original File Name: ChargePoint Public Comments to Nov 9 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 16:15:00

No Duplicates.

**Comment 115 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Josh  
Last Name: Thome  
Email Address: jthome@usgain.com  
Affiliation: U.S. Venture

Subject: U.S. Venture Comments on Nov 2022 LCFS Workshop  
Comment:

Please see attached for comments.

Attachment: [www.arb.ca.gov/lists/com-attach/127-lcfs-wkshp-nov22-ws-VCFcdAFzA34FXAh+.docx](http://www.arb.ca.gov/lists/com-attach/127-lcfs-wkshp-nov22-ws-VCFcdAFzA34FXAh+.docx)

Original File Name: U.S. Venture Comments on the Nov 2022 LCFS Workshop.docx

Date and Time Comment Was Submitted: 2022-12-21 16:24:34

No Duplicates.



**Comment 116 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Mihaly

Last Name: Wekler

Email Address: mwekler@anewclimate.com

Affiliation: Anew Climate, LLC

Subject: Anew Climate comments to November 9 LCFS Workshop

Comment:

Please see Anew Climate's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/129-lcfs-wkshp-nov22-ws-BmoBZABnACALUIII.pdf](http://www.arb.ca.gov/lists/com-attach/129-lcfs-wkshp-nov22-ws-BmoBZABnACALUIII.pdf)

Original File Name: LCFS Workshop 2022nov9 Comments Anew-Submitted.pdf

Date and Time Comment Was Submitted: 2022-12-21 16:33:15

No Duplicates.

**Comment 117 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-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 Nov. 9th LCFS Workshop

Comment:

Attached are comments for CARB staff's consideration. Thanks.

Attachment: [www.arb.ca.gov/lists/com-attach/130-lcfs-wkshp-nov22-ws-VzRUPiA0UmBWPgVa.pdf](http://www.arb.ca.gov/lists/com-attach/130-lcfs-wkshp-nov22-ws-VzRUPiA0UmBWPgVa.pdf)

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

Date and Time Comment Was Submitted: 2022-12-21 16:40:11

No Duplicates.

## **Comment 118 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Matthew

Last Name: Nelson

Email Address: matthew.nelson@electrifyamerica.com

Affiliation: Electrify America

Subject: Comments on November 9 LCFS workshop

Comment:

Please find Electrify America's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/132-lcfs-wkshp-nov22-ws-VDFWMQNdV2cEbVQ5.pdf](http://www.arb.ca.gov/lists/com-attach/132-lcfs-wkshp-nov22-ws-VDFWMQNdV2cEbVQ5.pdf)

Original File Name: EA Comments\_Nov. 2022 LCFS Workshop\_12.21.22.pdf

Date and Time Comment Was Submitted: 2022-12-21 16:10:29

No Duplicates.

**Comment 119 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Love

Last Name: Goyal

Email Address: goyal@lifecycleassociates.com

Affiliation: Life Cycle Associates LLC

Subject: Project-based crediting for fuel pathways utilizing CCS

Comment:

Please see attached letter for our comments.

Attachment: [www.arb.ca.gov/lists/com-attach/133-lcfs-wkshp-nov22-ws-WzdTNIExAw8BKlAP.pdf](http://www.arb.ca.gov/lists/com-attach/133-lcfs-wkshp-nov22-ws-WzdTNIExAw8BKlAP.pdf)

Original File Name: LCA\_-\_Project Crediting Comments Dec21.pdf

Date and Time Comment Was Submitted: 2022-12-21 16:47:39

No Duplicates.

**Comment 120 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-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: Comments regarding potential changes to the LCFS

Comment:

Generate Capital, PBC appreciates the opportunity to submit comments to CARB in response to the Low Carbon Fuel Standard (LCFS) workshop held on November 9, 2022.

Respectfully,

Suzanne Hunt and John Dannan

Attachment: [www.arb.ca.gov/lists/com-attach/134-lcfs-wkshp-nov22-ws-VDMBYgZpV2EKflU0.pdf](http://www.arb.ca.gov/lists/com-attach/134-lcfs-wkshp-nov22-ws-VDMBYgZpV2EKflU0.pdf)

Original File Name: Generate comments to CARB re potential LCFS changes\_12.21.22.pdf

Date and Time Comment Was Submitted: 2022-12-21 16:49:39

No Duplicates.

## **Comment 121 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Phoebe

Last Name: Seaton

Email Address: pseaton@leadershipcounsel.org

Affiliation: Leadership Counsel for Justice and Accou

Subject: UPDATED - Coalition Comments Re 11.9.2022 LCFS Workshop

Comment:

Please note that these comments have been updated with the addition of a signatory. Additionally, note that identified exhibits will be shared by email and are available upon request.

- phoebe

Attachment: [www.arb.ca.gov/lists/com-attach/135-lcfs-wkshp-nov22-ws-BWYGbwFtWWcGZVU7.pdf](http://www.arb.ca.gov/lists/com-attach/135-lcfs-wkshp-nov22-ws-BWYGbwFtWWcGZVU7.pdf)

Original File Name: Comments Re 11.9.2022 LCFS Workshop .pdf

Date and Time Comment Was Submitted: 2022-12-21 16:49:49

No Duplicates.

**Comment 122 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: David

Last Name: Hovermale

Email Address: [dhovermale@nopa.org](mailto:dhovermale@nopa.org)

Affiliation: National Oilseed Processors Association

Subject: NOPA Comments Regarding CARB November Workshop

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/136-lcfs-wkshp-nov22-ws-BmhXPgd2WGpWDwZZ.pdf](http://www.arb.ca.gov/lists/com-attach/136-lcfs-wkshp-nov22-ws-BmhXPgd2WGpWDwZZ.pdf)

Original File Name: NOPA\_ CARB Letter\_12-21-22.pdf

Date and Time Comment Was Submitted: 2022-12-21 16:58:27

No Duplicates.

**Comment 123 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Mikhael

Last Name: Skvarla

Email Address: mikhael\_skvarla@gualcogroup.com

Affiliation: TGG, Inc. on behalf of CHC and CHBC

Subject: CHC and CHBC LCFS Comments for the 11.09.2022 Workshop  
Comment:

Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/137-lcfs-wkshp-nov22-ws-VDdRP1Q2WFQHYgJq.pdf](http://www.arb.ca.gov/lists/com-attach/137-lcfs-wkshp-nov22-ws-VDdRP1Q2WFQHYgJq.pdf)

Original File Name: CHC\_CHBC LCFS Comment 11.09.2022 workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 16:59:56

No Duplicates.



**Comment 124 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Casandra

Last Name: Russo

Email Address: casandra.russo@amerigas.com

Affiliation:

Subject: Low Carbon Fuel Standard – November Workshop

Comment:

Please see the comments attached for your review and consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/138-lcfs-wkshp-nov22-ws-BWIWPwRyVVlSNwNi.pdf](http://www.arb.ca.gov/lists/com-attach/138-lcfs-wkshp-nov22-ws-BWIWPwRyVVlSNwNi.pdf)

Original File Name: Low Carbon Fuel Standard - November Workshop - AmeriGas Propane Comments.pdf

Date and Time Comment Was Submitted: 2022-12-21 16:59:17

No Duplicates.

**Comment 125 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Nicole

Last Name: Rice

Email Address: nicolerice@cngvc.org

Affiliation:

Subject: CNGVC Comment Letter on November 9, 2022 LCFS Workshop

Comment:

We appreciate this opportunity to submit comments in response to the November 9, 2022 Low Carbon Fuel Standard workshop.

Attachment: [www.arb.ca.gov/lists/com-attach/139-lcfs-wkshp-nov22-ws-UjFcNABmWXxRNFMM.pdf](http://www.arb.ca.gov/lists/com-attach/139-lcfs-wkshp-nov22-ws-UjFcNABmWXxRNFMM.pdf)

Original File Name: CNGVC Comment Letter on Nov 9 LCFS Workshop FINAL 122102.pdf

Date and Time Comment Was Submitted: 2022-12-21 17:14:08

No Duplicates.

**Comment 126 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Michael

Last Name: Boccadoro

Email Address: mboccadoro@westcoastadvisors.com

Affiliation: Dairy Cares

Subject: Dairy Cares Comments on the 11-9-22 Workshop to Discuss Potential Changes to the LCFS  
Comment:

Please see comments attached. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/140-lcfs-wkshp-nov22-ws-ATNdaQAwVTRXYwQ1.pdf](http://www.arb.ca.gov/lists/com-attach/140-lcfs-wkshp-nov22-ws-ATNdaQAwVTRXYwQ1.pdf)

Original File Name: 221221 Dairy Cares Comments on the 11-09-22 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 18:02:13

No Duplicates.

**Comment 127 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Calli

Last Name: Obern

Email Address: calli@capture6.org

Affiliation: Director of Policy

Subject: Comments on November 9, 2022 Workshop to Discuss Potential Changes to the LCFS  
Comment:

Please find attached comments regarding the LCFS from Capture6 and CarbonCure Technologies.

Attachment: [www.arb.ca.gov/lists/com-attach/141-lcfs-wkshp-nov22-ws-USFVJIIxVGtVOglq.pdf](http://www.arb.ca.gov/lists/com-attach/141-lcfs-wkshp-nov22-ws-USFVJIIxVGtVOglq.pdf)

Original File Name: Public Comments to CARB on LCFS Mineralization.docx 12.21.22.pdf

Date and Time Comment Was Submitted: 2022-12-21 18:46:19

No Duplicates.

**Comment 128 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: LCFS Credit Prices  
Comment:

CARB should make the compliance curve more stringent in order to stabilize credit prices and promote ZEV technologies.

Attachment: [www.arb.ca.gov/lists/com-attach/142-lcfs-wkshp-nov22-ws-BWkGY1AwUV1WfVcI.pdf](http://www.arb.ca.gov/lists/com-attach/142-lcfs-wkshp-nov22-ws-BWkGY1AwUV1WfVcI.pdf)

Original File Name: LCA\_-\_Comments 21Dec22 Credits.pdf

Date and Time Comment Was Submitted: 2022-12-21 18:49:32

No Duplicates.

**Comment 129 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Katelyn

Last Name: Roedner Sutter

Email Address: kroedner@edf.org

Affiliation: Environmental Defense Fund

Subject: EDF comments re: potential changes to LCFS

Comment:

Attached please find comments on behalf of Environmental Defense Fund regarding potential changes to the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/143-lcfs-wkshp-nov22-ws-BWBTMQBnUV1RNAhn.pdf](http://www.arb.ca.gov/lists/com-attach/143-lcfs-wkshp-nov22-ws-BWBTMQBnUV1RNAhn.pdf)

Original File Name: EDF Comments re potential changes to LCFS 12.21.22.pdf

Date and Time Comment Was Submitted: 2022-12-21 18:58:19

No Duplicates.

**Comment 130 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Elise

Last Name: Miller

Email Address: emiller@actcommodities.com

Affiliation: ACT Commodities

Subject: Comments on the LCFS Public Workshop

Comment:

ACT thanks you for your time and attention to our comments.

Attachment: [www.arb.ca.gov/lists/com-attach/144-lcfs-wkshp-nov22-ws-WzpTNgF0AAwHYgVq.pdf](http://www.arb.ca.gov/lists/com-attach/144-lcfs-wkshp-nov22-ws-WzpTNgF0AAwHYgVq.pdf)

Original File Name: ACT Commodities - LCFS Workshop Comments 11.09.22.pdf

Date and Time Comment Was Submitted: 2022-12-21 19:00:53

No Duplicates.

**Comment 131 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Daryl

Last Name: Maas

Email Address: hannah.huffines@maasenergy.com

Affiliation: Maas Energy Works

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

Thank you for your time and consideration while reviewing Maas Energy Works' comments.

Attachment: [www.arb.ca.gov/lists/com-attach/145-lcfs-wkshp-nov22-ws-BWldOFcwUXEKU1Mw.pdf](http://www.arb.ca.gov/lists/com-attach/145-lcfs-wkshp-nov22-ws-BWldOFcwUXEKU1Mw.pdf)

Original File Name: LCFS Comments - Maas Energy Works.pdf

Date and Time Comment Was Submitted: 2022-12-21 19:02:02

No Duplicates.



## **Comment 132 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Russell

Last Name: Dyk

Email Address: russ.dyk@btr.energy

Affiliation: Bridge To Renewables, Inc.

Subject: Comments to CARB's November 9th LCFS Workshop

Comment:

We are pleased to provide comments on potential changes to California's Low Carbon Fuel Standard ("LCFS") program. These comments build and expand upon comments and analysis that we provided on August 9th in response to CARB's July 7th 2022 Public Workshop.

We believe that our proposal - a "step-down" in the 2024 CI reduction target to 19% on the way to a 30% by 2030, along with the incorporation of an acceleration mechanism - affords ARB the opportunity to let the ambitions of the LCFS program re-take the lead and continue ARB's record of pursuing aggressive policies that support California's climate goals.

Attachment: [www.arb.ca.gov/lists/com-attach/146-lcfs-wkshp-nov22-ws-VjUGYQNwBzZXDgdk.pdf](http://www.arb.ca.gov/lists/com-attach/146-lcfs-wkshp-nov22-ws-VjUGYQNwBzZXDgdk.pdf)

Original File Name: CARB Comment Letter\_Nov 9 Workshop\_12.21.2022\_BTR.pdf

Date and Time Comment Was Submitted: 2022-12-21 19:26:18

No Duplicates.

## **Comment 133 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Russell

Last Name: Dyk

Email Address: russ.dyk@btenergy.com

Affiliation: Bridge To Renewables, Inc.

Subject: Comments to CARB's November 9th LCFS Workshop

Comment:

We are pleased to provide comments on potential changes to California's Low Carbon Fuel Standard ("LCFS") program. These comments build and expand upon comments and analysis that we provided on August 9th in response to CARB's July 7th 2022 Public Workshop.

We believe that our proposal - a "step-down" in the 2024 CI reduction target to 19% on the way to a 30% by 2030, along with the incorporation of an acceleration mechanism - affords ARB the opportunity to let the ambitions of the LCFS program re-take the lead and continue ARB's record of pursuing aggressive policies that support California's climate goals.

Attachment: [www.arb.ca.gov/lists/com-attach/147-lcfs-wkshp-nov22-ws-UTIBZlAjWWgHXlMw.pdf](http://www.arb.ca.gov/lists/com-attach/147-lcfs-wkshp-nov22-ws-UTIBZlAjWWgHXlMw.pdf)

Original File Name: CARB Comment Letter\_Nov 9 Workshop\_12.21.2022\_BTR.pdf

Date and Time Comment Was Submitted: 2022-12-21 19:46:26

No Duplicates.

## **Comment 134 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Anna

Last Name: Redmond

Email Address: redmond@lifecycleassociates.com

Affiliation: Life Cycle Associates

Subject: Letter of Comment on Potential Future Changes to the LCFS Program

Comment:

Thank you for the opportunity to provide comments on the November 9th workshop on potential changes to the Low Carbon Fuel Standard program.

Life Cycle Associates (LCA) has worked with several stakeholders on projects at various stages of digester development on existing dairy farms. At the workshop on November 9th, the Animal Legal Defense Fund objected to the current methane avoidance crediting on the basis that the current LCFS regulation incentivizes the expansion of dairies and increases in herd size. However, this contradicts our understanding of what would be considered acceptable within the program.

LCA advises clients against planning significant changes in herd sizes. From our understanding, expanding a dairy or starting a new dairy for the purpose of generating more LCFS credits is not in alignment with the goals of the LCFS program, and would not pass verification.

We respectfully request that CARB provide guidance on what changes in herd sizes would be considered acceptable within the LCFS program

Thank you for considering our comments. We look forward to continuing to work with you and other stakeholders to further the goals of the LCFS program.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-12-21 19:47:38

No Duplicates.

**Comment 135 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-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/149-lcfs-wkshp-nov22-ws-AWNTIFc4ADQGZVAP.pdf](http://www.arb.ca.gov/lists/com-attach/149-lcfs-wkshp-nov22-ws-AWNTIFc4ADQGZVAP.pdf)

Original File Name: Bunge Comments RE November 9 Public Workshop RE Potential Changes to the LCFS.pdf

Date and Time Comment Was Submitted: 2022-12-21 19:54:55

No Duplicates.

**Comment 136 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Dan

Last Name: Evans

Email Address: Dan@promusenergy.com

Affiliation: Promus Energy

Subject: Comments on Nov 2022 LCFS Workshop

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/150-lcfs-wkshp-nov22-ws-VydSJgdpAD4GdQh7.pdf](http://www.arb.ca.gov/lists/com-attach/150-lcfs-wkshp-nov22-ws-VydSJgdpAD4GdQh7.pdf)

Original File Name: Promus Energy CARB comments 12.21.22.pdf

Date and Time Comment Was Submitted: 2022-12-21 20:08:01

No Duplicates.

**Comment 137 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jessi

Last Name: Davis

Email Address: jdavis6@socalgas.com

Affiliation: SoCalGas

Subject: SoCalGas Comments on LCFS Workshop

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/151-lcfs-wkshp-nov22-ws-UiFdNFQ2VGYGbANk.pdf](http://www.arb.ca.gov/lists/com-attach/151-lcfs-wkshp-nov22-ws-UiFdNFQ2VGYGbANk.pdf)

Original File Name: SoCalGas Comments on CARBs November 9, 2022 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 20:37:21

No Duplicates.

**Comment 138 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Todd

Last Name: Campbell

Email Address: Todd.Campbell@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: LCFS Comment Letter re: Nov. 9 Workshop

Comment:

Please find attached a letter from Clean Energy providing comments related to the November 9th CARB workshop. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/152-lcfs-wkshp-nov22-ws-B2RTOQRgADJROQVa.pdf](http://www.arb.ca.gov/lists/com-attach/152-lcfs-wkshp-nov22-ws-B2RTOQRgADJROQVa.pdf)

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

Date and Time Comment Was Submitted: 2022-12-21 20:40:08

No Duplicates.

**Comment 139 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Alex

Last Name: Gallard

Email Address: agallard@bluestargas.com

Affiliation:

Subject: Low Carbon Fuel Standard – November Workshop

Comment:

Please attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/153-lcfs-wkshp-nov22-ws-AjNQZF1yVzZQZ1V7.pdf](http://www.arb.ca.gov/lists/com-attach/153-lcfs-wkshp-nov22-ws-AjNQZF1yVzZQZ1V7.pdf)

Original File Name: 12.21.22 LCFS Commentls to CARB.pdf

Date and Time Comment Was Submitted: 2022-12-21 20:43:43

No Duplicates.



**Comment 140 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Jonathan

Last Name: Hirte

Email Address: jonathan.hirte@dteenergy.com

Affiliation:

Subject: DTE Vantage Comments on Nov 9 LCFS Public Workshop

Comment:

Comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/154-lcfs-wkshp-nov22-ws-WjxXOFQ7AzFRO1IN.pdf](http://www.arb.ca.gov/lists/com-attach/154-lcfs-wkshp-nov22-ws-WjxXOFQ7AzFRO1IN.pdf)

Original File Name: FINAL DTE Nov 9 LCFS Workshop Comments.pdf

Date and Time Comment Was Submitted: 2022-12-21 20:56:32

No Duplicates.

**Comment 141 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: Earthjustice Comments on Nov. 9th LCFS Workshop  
Comment:

Thank you for consideration of our attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/155-lcfs-wkshp-nov22-ws-UTQCZQFyWX4LZQlj.pdf](http://www.arb.ca.gov/lists/com-attach/155-lcfs-wkshp-nov22-ws-UTQCZQFyWX4LZQlj.pdf)

Original File Name: Earthjustice LCFS Nov Workshop Comments.pdf

Date and Time Comment Was Submitted: 2022-12-21 21:01:39

No Duplicates.

## **Comment 142 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

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

Subject: Comments on November 9th Workshop  
Comment:

Hello,

Please find attached a ZIP archive with four files.

- 1) Our comments in response to the November 9th workshop.
- 2) A new technical report on Fractional Displacement Crediting in the LCFS. <https://escholarship.org/uc/item/0px4m8hz>
- 3) A policy brief, summarizing Fractional Displacement Crediting. Also available here: <https://escholarship.org/uc/item/7rf204xj>
- 4) A policy brief, summarizing modeling results related to 2030 LCFS target setting. Also available here: <https://escholarship.org/uc/item/85b37613>

Thank you,

Colin Murphy

Attachment: [www.arb.ca.gov/lists/com-attach/156-lcfs-wkshp-nov22-ws-Am9SPVwhU2YAc0D.pdf](http://www.arb.ca.gov/lists/com-attach/156-lcfs-wkshp-nov22-ws-Am9SPVwhU2YAc0D.pdf)

Original File Name: UCD Policy Institute Comment on Nov 9th Workshop.pdf

Date and Time Comment Was Submitted: 2022-12-21 21:02:34

No Duplicates.

**Comment 143 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Ashley

Last Name: Remillard

Email Address: ashley.remillard@hexagonagility.com

Affiliation: Hexagon Agility

Subject: Hexagon Agility Comments in Response to November 9, 2022 Public Workshop  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/158-lcfs-wkshp-nov22-ws-AWlcP1MqVGYAYQdo.pdf](http://www.arb.ca.gov/lists/com-attach/158-lcfs-wkshp-nov22-ws-AWlcP1MqVGYAYQdo.pdf)

Original File Name: Hexagon Agility - Letter to CARB re LCFS (12.19.22).pdf

Date and Time Comment Was Submitted: 2022-12-21 21:26:27

No Duplicates.

**Comment 144 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-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/160-lcfs-wkshp-nov22-ws-AmNUNVQ5ADIDawJm.pdf](http://www.arb.ca.gov/lists/com-attach/160-lcfs-wkshp-nov22-ws-AmNUNVQ5ADIDawJm.pdf)

Original File Name: AgLand LCFS Letter Dec 2022.pdf

Date and Time Comment Was Submitted: 2022-12-21 21:44:33

No Duplicates.

**Comment 145 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Shoshana

Last Name: Wechsler

Email Address: action@sunflower-alliance.org

Affiliation: Sunflower Alliance

Subject: LCFS Program Update: Renewable Diesel

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/161-lcfs-wkshp-nov22-ws-Am4AZVI1UHBQCQlq.pdf](http://www.arb.ca.gov/lists/com-attach/161-lcfs-wkshp-nov22-ws-Am4AZVI1UHBQCQlq.pdf)

Original File Name: LCFS Comments 12.22.2022-SFA.pdf

Date and Time Comment Was Submitted: 2022-12-22 00:14:28

No Duplicates.

**Comment 146 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Patrick

Last Name: Couch

Email Address: patrick.couch@gladstein.org

Affiliation:

Subject: Comments on November 9 Workshop to Discuss "Potential Changes to the Low Carbon Fuel Standard"  
Comment:

Comments on November 9 Workshop to Discuss "Potential Changes to the Low Carbon Fuel Standard"

Attachment: [www.arb.ca.gov/lists/com-attach/162-lcfs-wkshp-nov22-ws-Am5XMgZhUnIHXgFi.pdf](http://www.arb.ca.gov/lists/com-attach/162-lcfs-wkshp-nov22-ws-Am5XMgZhUnIHXgFi.pdf)

Original File Name: LCFS Comment Letter\_November 2022 LCFS workshop\_Ratchet Concept.pdf

Date and Time Comment Was Submitted: 2022-12-22 00:17:00

No Duplicates.

**Comment 147 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: MAN  
Last Name: ALTAHER  
Email Address: maltaher@smartchargetech.com  
Affiliation: Smart Charging Technologies

Subject: Advanced Auto Part Comments to LCFS Potential changes Workshop 7.7.2022  
Comment:

Advanced Auto Part Comments to LCFS Potential changes Workshop  
7.7.2022

Attachment: [www.arb.ca.gov/lists/com-attach/163-lcfs-wkshp-nov22-ws-AWIBZIEiV2YHLAJu.pdf](http://www.arb.ca.gov/lists/com-attach/163-lcfs-wkshp-nov22-ws-AWIBZIEiV2YHLAJu.pdf)

Original File Name: CARB-Letter Supporting MHE Crediting - Adv Auto.pdf

Date and Time Comment Was Submitted: 2022-12-22 06:58:56

No Duplicates.



**Comment 148 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Kari

Last Name: Buitenhoff

Email Address: kbuitenhoff@christiansoncpa.com

Affiliation: Christianson PLLP

Subject: Verification Change Considerations

Comment:

Please accept the attached file on behalf of Christianson PLLP in regards to potential changes that should be considered for the verification regulations.

Attachment: [www.arb.ca.gov/lists/com-attach/164-lcfs-wkshp-nov22-ws-UDNQPlMgVW9QJVQg.pdf](http://www.arb.ca.gov/lists/com-attach/164-lcfs-wkshp-nov22-ws-UDNQPlMgVW9QJVQg.pdf)

Original File Name: Christianson Public comments 12.22.22.pdf

Date and Time Comment Was Submitted: 2022-12-22 11:25:47

No Duplicates.

**Comment 149 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Scott  
Last Name: Coye-Huhn  
Email Address: scoyehuhn@scsglobalservices.com  
Affiliation: SCS Global Services

Subject: SCS Global Services Comment  
Comment:

Please see comment attached.

Attachment: [www.arb.ca.gov/lists/com-attach/165-lcfs-wkshp-nov22-ws-BXZXMI0vUFwBawJh.pdf](http://www.arb.ca.gov/lists/com-attach/165-lcfs-wkshp-nov22-ws-BXZXMI0vUFwBawJh.pdf)

Original File Name: SCS\_LCFS\_Comment\_on\_Standardization\_of\_Rotation.pdf

Date and Time Comment Was Submitted: 2022-12-22 17:58:27

No Duplicates.

## **Comment 150 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Lisa  
Last Name: McGhee  
Email Address: lisa@greenpowermotor.com  
Affiliation: GreenPower Motor Company

Subject: LCFS amendments: Staff response to questions impacting stakeholders  
Comment:

See attached and below:

From: Lisa McGhee  
Date: Sun, Nov 13, 2022 at 7:37 PM  
Subject: LCFS Modeling Transparency to support & prepare comments due 12-12-22  
To:

Compilation of comments for lcfs-wkshp-nov22-ws

I am requesting detailed answers to the information that the Staff has not made available to the public to support providing comments, see below.

Please provide answers to the following:

1) LCFS 2010-2045 CI Benchmark for each scenario A-C as shown on pp 24-26 in your presentation.  
> 2030, 2035, and 2040 are illustrated in your scenarios; however, on page 26 you state a 90% reduction by the year 2045 for all scenarios A-C.

> Provide the CI number for each year 2010-2045, the origin CI number, and do the same for each scenario A-C.

> Provide the CI percentage reduction for each year, and the origin CI %, and do the same for each scenario A-C.

> Provide this information in an Excel format by creating a table of the data with transparency on the calculations and formulas used.

> Provide the list of resources

2) LCFS CI Benchmark, the Linear percentage annual change between the period of years 2030, 2035, 2040, and 2045.

> What is the linear % change for the years: 2024-2030 for each scenario A-C?

> What is the linear % change for the years: 2030-2035 for each scenario A-C?

> What is the linear % change for the years: 2035-2040 for each scenario A-C?

> What is the linear % change for the years: 2040-2045 for each scenario A-C?

3) LCFS reduced Values annually

> What is the LCFS reduced value for each year 2023-2045 from the Modeling impacts of the lower CI in your proposal for each scenario A-C?

> What is the LCFS reduced % value for each year 2023-2045 from the Modeling impacts of the lower CI in your proposal for each scenario A-C?

4) LCFS Deficits Generated

- > Provide the estimated Deficits generated each quarter for each year 2023-2045 for each Scenario A-C.
- > Provide the historic Deficits generated from each quarter for each year 2010-2022
- > What is the deficit outlook % increase for each year 2023-2045 from the Fuel Benchmark changes for each Scenario A-C?
- > Provide this information in an Excel format by creating a table of the data with transparency on the calculations and formulas used.
- > Provide a list of the resources

5) LCFS Credits Generated

- > Provide the estimated Credits generated each quarter for each year 2023-2045 for each Scenario A-C.
- > Provide the historic Credits generated from each quarter for each year 2010-2022
- > Provide this information in an Excel format by creating a table of the data with transparency on the calculations and formulas used.
- > Provide a list of the resources

6) 5.0 EER Credits Generated and the kWh average rate earned

- > Provide the estimated kWh rate value generated each year 2023-2045 for each Scenario A-C.
- > Provide the historic kWh rate generated from each year 2010-2022
- > Provide this information in an Excel format by creating a table of the data with transparency on the calculations and formulas used.
- > Provide a list of the resources

7) CI Electricity as a Transportation Fuel Pathway as shown on p 13 of the CATS PDF Model document.

- > This table provides CI numbers for each year during 2022-2045
- > This table provides assumptions of CI reduction percentages for each year 2022-2045 as per Alt 3 Scoping Plan CI Relative to 2021
- > Provide the CI number for each year 2010-2045, and the origin CI number (will only apply to years 2022-2045 if it has changed)
- > Provide the CI percentage reduction for each year 2010-2045, and the origin CI % (will only apply to years 2022-2045 if it has changed)
- > Provide this information in an Excel format by creating a table of the data with transparency on the calculations and formulas used.
- > Provide a list of the resources

8) ELC000L00072023 California average grid electricity used as a transportation fuel in California.

- > The current proposed CI for the year 2023 update to Electricity Lookup Table Pathways is 81.00 CI
- > Explain how your CATS Table 10 on page 13 with a CI for years 2023 of 69.50 is established.
- > What is the purpose of not aligning it with the annual trued-up values for 2023?
- > See the link below for comments due on 12-31-22 relating to this True up for the year 2023

9) Explain how the EER values are being updated (if are) based on HDV EV Performance data collected.

- > HDV EV VMT Data was novel; however, it is now available as it relates to Electricity as a Transportation fuel which is impacted by the EER.
- > Specifically, the scoping plan on pg 49 demonstrates the MD EV sales share is critical to GHG reduction and VMT.
- > How are the MD vs HD real-world Electricity as a Transportation

Fuel and the number of EV miles traveled being analyzed with the current data?

- > Provide any calculations in your analysis in an Excel format by creating a table of the data with transparency on the calculations and formulas used.
- > Provide a list of the resources

#### 10a) MHD FCI Fueling Stations.

- > The current LD FCI station's fueling capacity generation covers 10-20% utilization and can generate infrastructure credits for 5 yrs or when the total revenue exceeds capital expenses for the station, whichever comes first.
- > The current HRI is based on 100% of the station capacity and can generate infrastructure credits for 15 yrs or when the total revenue exceeds capital expenses for the station, whichever comes first.
- > Currently applications for new stations can only be accepted as long as the estimated potential HRI and FCI credits from all approved stations do not exceed 2.5% of LCFS deficits in the prior quarter.
- > The proposal as shown on p 34 for the MHD FCI Fueling stations uses 5% of deficits or 10% of deficits.

#### 10b) FCI/HRI Credits Generated:

- > Provide a history of the quarterly results each year from the FCI/HRI programs to date: 1) credits per quarter 2) deficits per quarter

For example:

> Q1 2022: Deficits generated = 5.14M. 2.5% Cap allowed = 128k. Credits estimated = 73k.

<https://ww2.arb.ca.gov/resources/documents/lcfs-zev-infrastructure-crediting>

> Q2 2022: Deficits generated = 5.39M. 2.5% Cap allowed = 134k.

Credits estimated = ? Please provide this answer

#### FCI Credits Generated:

- > Provide the number of estimated credits generated each quarter for each year 2023-2045
- > Provide the historic number of credits generated each quarter for each year 2019-2022
- > Provide a history of the quarterly results from the existing FCI stations to date: 1) kW per site 2) utilization % covered 3) Cost of site 4) are any of these sites not likely on target to collect its cost?

#### HRI Credits Generated:

- > Provide the number of estimated credits generated each quarter for each year 2023-2045
- > Provide the historic number of credits generated each quarter for each year 2019-2022

#### 10c) Pending FCI/HRI Applications?

- > How many FCI Pending Applications are there currently?
- > How many HRI Pending Applications are there currently?
- > In your responses to 10a-10c, provide any calculations in your analysis in an Excel format by creating a table of the data with transparency on the calculations and formulas used.
- > Provide a list of the resources

#### 11) Scoping Plan and MHD FCI Charging Stations

- > Where in the Scoping plan can you find the proposal for the FCI MHD Stations?
- > Where are the details to support LD to be mixed with MHD?
- > These stations should support Private Access Fueling Facilities with NO LDA
- > The MHD program needs to allow more years for the cap, allow 10 years for the cap, as the cost of MHD chargers is on average double if not more per site due to the High Voltage Power that will be a priority for MHD FCI stations and the increased amount of real estate to be devoted to charging MHD vehicles.
- > Where are the analysis to support the 5-year cap for MHD compared to LDA?
- > In your responses provide any calculations in your analysis in an Excel format by creating a table of the data with transparency on

the calculations and formulas used.  
> Provide a list of the resources

Link is below to the 2023 California Average Grid Electricity Used as a Transportation Fuel in California and Electricity Supplied under the Smart Charging or Smart Electrolysis Provision, comments are due 12-31-22.

[https://www.arb.ca.gov/fuels/lcfs/fuelpathways/comments/tier2/2023\\_elec\\_update.pdf?\\_ga=2.1462642.217825719.1668290253-1836391743.1666026400](https://www.arb.ca.gov/fuels/lcfs/fuelpathways/comments/tier2/2023_elec_update.pdf?_ga=2.1462642.217825719.1668290253-1836391743.1666026400)

Attachment: [www.arb.ca.gov/lists/com-attach/166-lcfs-wkshp-nov22-ws-WitQI1YyVHQCcFM6.docx](http://www.arb.ca.gov/lists/com-attach/166-lcfs-wkshp-nov22-ws-WitQI1YyVHQCcFM6.docx)

Original File Name: Questions to Staff on Amendments 12-22-22.docx

Date and Time Comment Was Submitted: 2022-12-22 23:41:13

No Duplicates.

## **Comment 151 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Chris

Last Name: Bliley

Email Address: cbliley@growthenergy.org

Affiliation: Growth Energy

Subject: subject of comment

Comment:

Please see our attached comment and earlier comments. Thank you

Attachment: [www.arb.ca.gov/lists/com-attach/167-lcfs-wkshp-nov22-ws-VTZdOgR3BTRQCQB.pdf](http://www.arb.ca.gov/lists/com-attach/167-lcfs-wkshp-nov22-ws-VTZdOgR3BTRQCQB.pdf)

Original File Name: CARB\_LCFSWorkshop11092022\_Final.pdf

Date and Time Comment Was Submitted: 2023-01-13 11:21:53

No Duplicates.

**Comment 152 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Laur  
Last Name: Rengar  
Email Address: helpline@arb.ca.gov  
Affiliation: Cal ETC

Subject: subject of comment  
Comment:

Please see our attached comment

Attachment: [www.arb.ca.gov/lists/com-attach/168-lcfs-wkshp-nov22-ws-VTYHYAdqWW9WJAFi.pdf](http://www.arb.ca.gov/lists/com-attach/168-lcfs-wkshp-nov22-ws-VTYHYAdqWW9WJAFi.pdf)

Original File Name: CalETC-comment-letter-LCFS-Nov-9-workshop.pdf

Date and Time Comment Was Submitted: 2023-01-13 11:21:53

No Duplicates.



**Comment 153 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: Noah  
Last Name: Garcia  
Email Address: noah.garcia@evgo.com  
Affiliation: EV go

Subject: subject of comment  
Comment:

Comments on the California Air Resources Board Workshop

Attachment: [www.arb.ca.gov/lists/com-attach/170-lcfs-wkshp-nov22-ws-VjMAcAZgUGwBWAdr.pdf](http://www.arb.ca.gov/lists/com-attach/170-lcfs-wkshp-nov22-ws-VjMAcAZgUGwBWAdr.pdf)

Original File Name: EVgo LCFS Comments November Workshop Final.pdf

Date and Time Comment Was Submitted: 2023-01-13 11:21:53

No Duplicates.

## **Comment 154 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: morgan

Last Name: beeler

Email Address: morgan.beeler@stxgroup.com

Affiliation: STX Commodities, LLC.

Subject: subject of comment

Comment:

Comment on LCFS Prerulemaking Workshop Regarding Phaseout of Book-and-Claim

STX Commodities, LLC respectfully submits the attached comment in response to potential updates to the Low Carbon Fuel Standard program as outlined by CARB staff during the November 9th, 2022, prerulemaking workshop. STX appreciates the opportunity to provide comment and we look forward to our continued participation in the rulemaking process.

Attachment: [www.arb.ca.gov/lists/com-attach/171-lcfs-wkshp-nov22-ws-AHNTIV0kVloFYFU6.pdf](http://www.arb.ca.gov/lists/com-attach/171-lcfs-wkshp-nov22-ws-AHNTIV0kVloFYFU6.pdf)

Original File Name: STX Comment on CARB LCFS Prerulemaking\_December 2022.pdf

Date and Time Comment Was Submitted: 2023-01-17 10:43:15

No Duplicates.

**Comment 155 for Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) - 1st Workshop.**

First Name: kent

Last Name: engelbrecht

Email Address: kent.engelbrecht@adm.com

Affiliation: ADM

Subject: subject of comment

Comment:

Thank you for the opportunity to comment on the potential changes to the LCFS.

Attachment: [www.arb.ca.gov/lists/com-attach/173-lcfs-wkshp-nov22-ws-UTBQMIQ4VlpXPVIX.pdf](http://www.arb.ca.gov/lists/com-attach/173-lcfs-wkshp-nov22-ws-UTBQMIQ4VlpXPVIX.pdf)

Original File Name: ADM LCFS comments 122122 signed.pdf

Date and Time Comment Was Submitted: 2023-01-17 11:40:53

No Duplicates.

**There are no comments posted to Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard (lcfs-wkshp-nov22-ws) that were presented during the Workshop at this time.**