

## **Comment 1 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 1st Workshop.**

First Name: Timo  
Last Name: Haatainen  
Email Address: tkjhaatainen@gmail.com  
Affiliation:

Subject: DGS debit calculation in Tier I and Tier II calculators  
Comment:

It would seem appropriate that corn oil DGS debit for RD/BD is calculated according to the same terms in both Tier I and Tier II calculators.  
I have included comments on the differences I have observed on the attached PDF.

Based on the above it seems that DGD's CI calculation for corn oil based RD is not inline with the Tier I calculators approach on DGS debit.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-tier2lcfspathways-ws-VzNVNAd1BAGFYAh6.pdf>

Original File Name: DGS credit reduction RD and BD.pdf

Date and Time Comment Was Submitted: 2017-03-20 13:57:25

No Duplicates.

## **Comment 2 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 1st Workshop.**

First Name: Timo  
Last Name: Haatainen  
Email Address: tkjhaatainen@gmail.com  
Affiliation:

Subject: Rendering energy consumption & RD yield  
Comment:

Tier II calculator seems to allocate rendering energy consumption on BioOil tab in cell DS247.

(DS247 in Tier II)  
=B41\*IF(\$G\$14=2;AF208;IF(\$G\$14=3;O213;IF(\$G\$14=4;O222;1)))

(DS247 in Tier I)  
=3944, when tallow RD is chosen on the Tier I Calculator tab

To use the same calculation method as in Tier I tool it would seem appropriate that the Tier I rendering energy consumption would be inserted in this cell instead of B41.

Furthermore to align the calculation methodology with the Tier I tool it seems that the RD yield should also be considered in cell D52 on the BioOil tab. B52 = lb RD/lb tallow (or 1/D40)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-03-20 14:15:11

No Duplicates.

### **Comment 3 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 1st Workshop.**

First Name: Robert

Last Name: Smith

Email Address: robxsmith@mac.com

Affiliation: I use 100% HPRD in my Tractor and Truck

Subject: Use of Used cooking oil to make Biodiesel in California

Comment:

Renewable Diesel is a superior drop in biofuel replacement for Fossil Diesel that is far superior to BioDiesel. BioDiesel is not a drop-in fossil diesel replacement and is actually detrimental to efforts for replacement of fossil fuel with biofuel because of its many problems even at B20 levels.

Used cooking oil is a feedstock that is most easily made into either RD or BD, but should not be wasted in California making BioDiesel.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-05-12 15:01:41

No Duplicates.

## **Comment 4 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Nicholas  
Last Name: Littlejohn  
Email Address: nicklittlejohn@gmail.com  
Affiliation: Citizen

Subject: Organic consideration  
Comment:

We may consider giving organic dairies more credit as the feed has fewer petroleum derived fertilizer and pesticide inputs.

Thank you,  
Nicholas

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-06-08 16:52:08

No Duplicates.

**Comment 5 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Steve

Last Name: Hartig

Email Address: Steve.hartig@icminc.com

Affiliation: ICM, Incorporated

Subject: Comments on Pathway T2N-1153 Corn Fiber to Ethanol

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-tier2lcfspathways-ws-WjlQNwd0BTRVDAVm.pdf>

Original File Name: CARB Comment.pdf

Date and Time Comment Was Submitted: 2017-09-12 15:52:06

No Duplicates.

**Comment 6 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Brian  
Last Name: Thome  
Email Address: scaswell@edeniq.com  
Affiliation: Edeniq, Inc.

Subject: Comments on Little Sioux Pathway Completion  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-tier2lcfspathways-ws-BWBQMgRgVmsGaQJz.pdf>

Original File Name: Edeniq Comment to CARB re LSCP Pathway FINAL.pdf

Date and Time Comment Was Submitted: 2017-09-12 15:57:23

No Duplicates.

**Comment 7 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Thomas  
Last Name: Lawson  
Email Address: thomas@cngvc.org  
Affiliation:

Subject: CNGVC Comment Letter  
Comment:

Attached is our comment letter.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-tier2lcfspathways-ws-WzgGblQyBCFQNVcI.pdf>

Original File Name: CNGVC Comment Letter on Tier 2 Pathway 11.21.17.pdf

Date and Time Comment Was Submitted: 2017-11-20 18:25:51

No Duplicates.

## **Comment 8 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Kenneth

Last Name: Koers

Email Address: koers@lifecycleassociates.com

Affiliation: Life Cycle Associates

Subject: Transportation distances for UCO

Comment:

First, it is unclear from the application how the transport distances for UCO are treated. What is not clear is if the oil is purchased from aggregators, or if REG is collecting themselves.

If the aggregators are collecting the UCO, is the 50 mile default and heavy duty truck assumption accurate?

If the aggregators are simply collecting UCO and delivering to the facility and the pathway assumes a conservative extra 50 miles, this should be made clear.

If the transport distance is for collection only not purchased from aggregators, are what does their transportation network look like? Are they utilizing full 80,000 GVW trucks for collection, or smaller trucks to pick up loads? If purchased by aggregators, the oil collected by REG for processing would have been collected for waste processing in any case.

Compare this to the recent pathway for General, which claims to have records for transportation distances (given in miles given per gallon), and gives a transportation of 5 miles. They specifically call out obtaining the UCO directly from restaurants, rather than aggregators.

Secondly, the application assigns the US average electricity mix to UCO rendering, which is defined in the feedstock phase. However, rendering is accomplished in the same location as biodiesel production and rendering is the only activity that occurs in the feed phase. So, the region for feed and fuel should be the same.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-05-23 11:13:11

No Duplicates.



## **Comment 9 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Kevin

Last Name: Hamilton

Email Address: kevin.hamilton@centralcalasthma.org

Affiliation: Central California Asthma Collaborative

Subject: T2N-1247

Comment:

With regard to this application. Central California Asthma Collaborative recommends denial due to coal fired burner being used to create steam for this process. CA renewable standards do not support coal or other non-renewable sources as any part of producing a renewable energy credit supported product.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-06-07 14:21:15

No Duplicates.

**Comment 10 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Larry  
Last Name: Thrall  
Email Address: larry.thrall@vireoenergy.com  
Affiliation: Vireo Energy

Subject: solar electricity must be higher than grid electricity used  
Comment:

The proposed pathway states: The CI value listed in the above table is valid only as long as the electricity (kWh) generated by the photovoltaic system exceeds the grid electricity (kWh) used.

Is this actual production in real time or is this on a net metered basis? If so, is it daily, monthly, yearly?

I am hoping that it will be calculated on a yearly net metered basis which would promote more solar and EV charging across California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-10-25 16:47:02

No Duplicates.

**Comment 11 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Noah

Last Name: Bucon

Email Address: noah.bucon@resource-solutions.org

Affiliation: Center for Resource Solutions

Subject: CRS Comments on LCFS Tier 2 Pathways for PV-EV Charging  
Comment:

Please see attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-tier2lcfspathways-ws-VjVVIQByUFwBZAIm.pdf>

Original File Name: CRS Comments\_LCFS Tier 2 Pathways\_11.8.2018.pdf

Date and Time Comment Was Submitted: 2018-11-08 15:59:45

No Duplicates.

**Comment 12 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Don

Last Name: Scott

Email Address: DScott@biodiesel.org

Affiliation: National Biodiesel Board

Subject: Comments on T2N-1246 UCO to Biodiesel pathwya

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/18-tier2lcfspathways-ws-AGNVPFQ4V2kDYFc5.docx>

Original File Name: Comments on T2N-1246 UCO to Biodiesel.docx

Date and Time Comment Was Submitted: 2019-01-15 15:21:52

No Duplicates.

## **Comment 13 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Norma

Last Name: McDonald

Email Address: norma.mcdonald@ows.be

Affiliation:

Subject: Documentation missing

Comment:

There is no documentation containing information about the pathway, making it impossible to comment or understand the CI number.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-02-11 05:31:47

No Duplicates.

**Comment 14 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christy

Last Name: Lewis

Email Address: [christy@watttime.org](mailto:christy@watttime.org)

Affiliation: WattTime

Subject: WattTime comments on Smart Charging Pathway

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-tier2lcfspathways-ws-WyxWMQB1WH9WJAZv.zip>

Original File Name: WattTime\_Comments\_3\_22\_19.zip

Date and Time Comment Was Submitted: 2019-03-25 09:31:46

No Duplicates.

**Comment 15 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Joy  
Last Name: Alafia  
Email Address: joy@westernpga.org  
Affiliation: Western Propane Gas Association

Subject: Bio/Renewable Propane Temporary Pathway  
Comment:

Please find the attached comments regarding propane and the LCFS.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-tier2lcfspathways-ws-WmhTZQAwwT8KUwBs.pdf>

Original File Name: 2019 LCA\_-Bio LPG Temporary FPC.pdf

Date and Time Comment Was Submitted: 2019-03-25 13:28:01

No Duplicates.

**Comment 16 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Curtis  
Last Name: Powers  
Email Address: curtis.powers@regi.com  
Affiliation: REG

Subject: Renewable Propane Temporary Pathways  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-tier2lcfspathways-ws-BXdTMFUzVloFcQRh.pdf>

Original File Name: REG Renewable Propane TFPC Comments 3.25.19.pdf

Date and Time Comment Was Submitted: 2019-03-25 14:59:44

No Duplicates.



**Comment 17 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Dean  
Last Name: Taylor  
Email Address: Dean@calETC.com  
Affiliation: California Electric Trnsprtn Coalition

Subject: Comments supporting CARB proposal on annual lookup table updates for electricity  
Comment:

CalETC supports CARB staff's proposal on grid average electricity  
CI for 2019 and the 2019 smart charging and smart electrolysis CI

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-tier2lcfspathways-ws-AGMGYQNuADYGdFQ3.pdf>

Original File Name: CalETC Comment Letter on CARB guidance document for annual update to grid electricity  
CI.pdf

Date and Time Comment Was Submitted: 2019-03-25 15:02:30

No Duplicates.

**Comment 18 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Dean  
Last Name: Taylor  
Email Address: Dean@calETC.com  
Affiliation: California Electric Trnsprtn Coalition

Subject: Comments on 2019 update to aver electricity CI and smart charging CI  
Comment:

Attached letter from CalETC supports CARB staff 2019 updates to the  
CI lookup table for grid average electricity and smart charging /  
smart electrolysis

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-tier2lcfspathways-ws-B2RSNVU4V2EHdQNg.pdf>

Original File Name: CalETC Comment Letter on CARB guidance document for annual update to grid electricity CI.pdf

Date and Time Comment Was Submitted: 2019-03-25 15:28:50

No Duplicates.

## Comment 19 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.

First Name: jharvey

Last Name: eder

Email Address: harveyederpspc@yahoo.com

Affiliation: pspc self & director public solar power

Subject: incorpaaaaarate by reference all my our comments made in sacto ca et call oral and writte  
Comment:

i incorporate by reference all of my oral and writtencomments and  
all the work done on contract and off by me he and pspc etc. as  
rep of the Abalone Alliance point person for the A. A in slo ca.  
amd representinmgsolar and energgggggy renewables in all  
applications and activit5ies in local, st5ate, federal amd regional  
and internatiuoinal all communications of any type  
--bein purged here didn't type what is just wrote3.

this is a formal request for 10 more3 days to cfomment on thiis is  
made oral coments as well as writteniim all the yrs. as the 1st  
lo9cal government and ( the Lliving Xmas tree lot etc. need more  
time tocccomment ..

This was after considerable discussions wit5h staff and  
administration -- ch4 is 85 times ac 84 and 86 gwp vs. 20-25 used  
by the state and all 199i litigation which must never rate  
thenumbers of direct untreated ch4 realesaed or baseling styorag  
atorage and low carbon fuel standard mkt of 100 t0 150 dollars we  
pe tome ahrvey eder ex dir founder of pspc pub

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-03-25 16:13:05

No Duplicates.

**Comment 20 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Curtis  
Last Name: Powers  
Email Address: curtis.powers@regi.com  
Affiliation:

Subject: Revised Renewable Propane TFPCs  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-tier2lcfspathways-ws-WylTMFUiU2kEcQBl.pdf>

Original File Name: Revised Renewable Propane TFPC Comments 5.14.19.pdf

Date and Time Comment Was Submitted: 2019-05-14 07:17:56

No Duplicates.

## **Comment 21 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: SONIA

Last Name: TERRY

Email Address: 123STERRY@GMAIL.COM

Affiliation:

Subject: Higher Heating Value Programming Instruments and Sky Temperature Instruments

Comment:

You got to have those two component in place and change the Jet Fuel to Natural Gas. You got to be able to calculate the amount of damage that fuel is doing or isn't doing before you can fine anyone. But those are changes that have to be made in the manufacturing stages of engines as well. It should lower the Sky Temperature.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-08-20 17:40:41

No Duplicates.

**Comment 22 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Nancy  
Last Name: Young  
Email Address: nyoung@airlines.org  
Affiliation: Airlines for America (A4A)

Subject: Comments on PROPOSED NEW TEMPORARY FUEL PATHWAY  
Comment:

Please see the attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/826-tier2lcfspathways-ws-UjMCMAFhUFxXMLc4.pdf>

Original File Name: A4A Comments - CARB Proposed Temporary Pathway for AJF-9-16-19.pdf

Date and Time Comment Was Submitted: 2019-09-16 13:09:13

No Duplicates.

**Comment 23 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Dayne  
Last Name: Delahoussaye  
Email Address: dayne.delahoussaye@neste.com  
Affiliation:

Subject: Comments on the Proposed New Temporary Pathway for Alternative Jet Fuel  
Comment:

See attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/827-tier2lcfspathways-ws-BTdcalVIUjgEL1dn.pdf>

Original File Name: 2019-09-16 Neste Comments - CARB SAF Temp Pathway.pdf

Date and Time Comment Was Submitted: 2019-09-16 13:13:11

No Duplicates.

## **Comment 24 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Kevin

Last Name: Hamilton

Email Address: kevin.hamilton@centralcalasthma.org

Affiliation: CENTRAL CALIFORNIA ASTHMA COLLABORATIVE

Subject: Application No. B0019 tier2lcfspathways-w

Comment:

Central California Asthma Collaborative's position is that dairy biogas use for electricity to provide energy for goods movement, is a far more climate friendly and effective climate gas utilization strategy than fueling natural gas trucks or engines. Conditions under which that is produced and distributed need to be addressed prior to energy leaving the farm for transfer to the grid. Primarily the production of NOx as an emission's by-product should be eliminated, reduced and/or mitigated by replacement of various vehicles and equipment on-dairy with electric solutions. Replace tractors, fork lifts, Class 2,3,4 vehicles used both for travel on-site, local hauling feed and equipment, and PTO driven equipment, for mobile source reduction. Replace carousel, pumps and other stationary source engines as well.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-10-29 17:14:25

No Duplicates.



## **Comment 25 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Tom  
Last Name: Frantz  
Email Address: tom.frantz49@gmail.com  
Affiliation: Association of Irrigated Residents

Subject: B001901

Comment:

re: B001901      Open Sky Ranch, Riverdale

There are two major problems with this proposal or application and analysis.

First, this proposed project by Open Sky Ranch Dairy has no net benefits for the local low-income community nearby in Riverdale and in the surrounding area of Fresno County. The San Joaquin Valley, including Fresno County, is not in compliance with several of the federal health standards set under the authority of the Clean Air Act. Ozone and PM2.5 are two categories of air pollution where compliance is severely lacking. We should not have to detail in these comments the health effects of local air pollution but premature death is the most obvious consequence.

This proposal will produce methane in a manure digester and burn it nearby for the purpose of generating electricity even though there is plenty of electricity already in the local grid to supply the needs of the dairy which is produced more cleanly. The result of this digester and electrical generation through combustion will impact local air quality through the creation of NOx. NOx is key to ozone formation in the warm months of the SJV and is key to a majority of PM2.5 formation in the cooler months. The need to reduce NOx emissions in the San Joaquin Valley is the key to the valley reaching compliance with the federal clean air standards.

This project, because it will make local air quality worse, is in conflict with the language of AB32 which, in summary, says that efforts to reduce GHG emissions should not compromise or conflict with efforts to reduce air pollution in nonattainment areas.

Second, the Low Carbon Fuel Standard requires that each fuel pathway receive a life-cycle assessment of all related GHG emissions, both direct and indirect. It seems that this has not been done for the analysis of carbon intensity of the electricity to be produced by this project. It may be that the guidance from CARB for this type of project is incorrect as well.

The manure must be produced in order for this project to both produce and collect methane for the purpose of combustion in an electrical generator. No analysis has been done regarding the GHG emissions involved in the production of this manure. The GHG emissions of the dairy regarding the milk produced are not regulated. Therefore, these emissions must be applied to the manure and to the methane created from that manure. This methane is created on purpose, not by chance, through the liquefaction of the manure. The business of producing and collecting this methane is for the intent of making a profit. This should be obvious.

In conclusion, this project should be denied because it will harm local air quality. If the harm to local air quality is mitigated, then before approval, a complete life-cycle assessment of how the

methane is created, including everything associated with the cows creating the manure, must be completed.

Tom Frantz  
President, Association of Irrigated Residents

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-11-12 14:37:16

No Duplicates.

**Comment 26 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Shelby  
Last Name: Neal  
Email Address: SNeal@biodiesel.org  
Affiliation: National Biodiesel Board

Subject: Comments for pathway B0018 by BP Products (C4320)  
Comment:

Please see attached letter (2nd try at uploading). Thanks.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/831-tier2lcfspathways-ws-BmhTNwZIVFgEYQJt.pdf>

Original File Name: NBB Comments on BP Co-Processing Pathway 12052019(FINAL).pdf

Date and Time Comment Was Submitted: 2019-12-05 12:00:03

No Duplicates.

**Comment 27 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Matt

Last Name: Herman

Email Address: matt.herman@regi.com

Affiliation:

Subject: Renewable Energy Group, BP Cherry Point Co-processing Comments  
Comment:

Please find our co-processing comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/832-tier2lcfspathways-ws-UzEBdwdZADBQPlcy.zip>

Original File Name: BP Cherry Point Submission.zip

Date and Time Comment Was Submitted: 2019-12-05 15:11:00

No Duplicates.

**Comment 28 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Phoebe

Last Name: Seaton

Email Address: pseaton@leadershipcounsel.org

Affiliation: Leadership Counsel

Subject: Application No. B0037; SMUD (S338)

Comment:

Please find attached comments opposing Application Number B0037.

Thank you,

Phoebe Seaton

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/835-tier2lcfspathways-ws-UzACa1Q4V2kFZgFv.pdf>

Original File Name: Comments Re Application No. BOO37.pdf

Date and Time Comment Was Submitted: 2019-12-24 13:16:38

No Duplicates.

**Comment 29 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Phoebe

Last Name: Seaton

Email Address: pseaton@leadershipcounsel.org

Affiliation: Leadership Counsel

Subject: Application No. B0038 SMUD (S338)

Comment:

Please see comments attached opposing Application Number B0038.

Thank you,

Phoebe Seaton

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/836-tier2lcfspathways-ws-WjlXPlwwAjxWNQRq.pdf>

Original File Name: Comments Re Application No. BOO38.pdf

Date and Time Comment Was Submitted: 2019-12-24 13:24:18

No Duplicates.

**Comment 30 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Phoebe

Last Name: Seaton

Email Address: pseaton@leadershipcounsel.org

Affiliation: Leadership Counsel

Subject: Application No. B0058; AMP Americas LLC (5968)

Comment:

Please find attached comments opposing approval of application number B0058.

Thank you for your consideration,

Phoebe Seaton

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/837-tier2lcfspathways-ws-B2RXPgBsBTtVNgZo.pdf>

Original File Name: Comments Re Applicatio No. B0058.pdf

Date and Time Comment Was Submitted: 2019-12-27 16:24:47

No Duplicates.

**Comment 31 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Phoebe

Last Name: Seaton

Email Address: pseaton@leadershipcounsel.org

Affiliation: Leadership Counsel

Subject: Application No. B0060; AMP Americas LLC (5968)

Comment:

To whom it may concern,

Please find attached a comment letter in response to Comment Letter No. B0060.

Thanks,

Phoebe Seaton

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/838-tier2lcfspathways-ws-B2RVPAFtBTsLaAdp.pdf>

Original File Name: Comments in Response to application B0060.pdf

Date and Time Comment Was Submitted: 2020-01-09 16:05:08

No Duplicates.



**Comment 32 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Phoebe  
Last Name: Seaton  
Email Address: pseaton@leadershipcounsel.org  
Affiliation: Leadership Counsel

Subject: Application No. B0010; Element Markets Renewable Energy, LLC (5877)  
Comment:

Please find attached comments in response to Application Number B0010.

Thanks so much,

Phoebe Seaton

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/839-tier2lcfspathways-ws-AmFXPII+WWcAYwln.pdf>

Original File Name: Comments in Response to Application No. B0010.pdf

Date and Time Comment Was Submitted: 2020-01-13 14:48:26

No Duplicates.

**Comment 33 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Phoebe

Last Name: Seaton

Email Address: pseaton@leadershipcounsel.org

Affiliation: Leadership Counsel

Subject: Application No. B0009; Element Markets Renewable Energy (5877)

Comment:

Please find attached a comment letter in response to Application Number B00009.

Thanks so much,

Phoebe Seaton

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/840-tier2lcfspathways-ws-UTIAaVc7AjwCYQln.pdf>

Original File Name: Comments Re Application No. B0009.pdf

Date and Time Comment Was Submitted: 2020-01-15 13:53:30

No Duplicates.

**Comment 34 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Tom

Last Name: Frantz

Email Address: tom.frantz49@gmail.com

Affiliation: Association of Irrigated Residents

Subject: Opposition to Tier 2 pathway application #B0005

Comment:

see attached comment letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/841-tier2lcfspathways-ws-UTJXPIQ4BzkGZQNt.docx>

Original File Name: Comments on #B0005 Red Trail Energy.docx

Date and Time Comment Was Submitted: 2020-02-19 13:12:33

No Duplicates.

**Comment 35 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Tiffany

Last Name: Roberts

Email Address: troberts@wspa.org

Affiliation: Western States Petroleum Association

Subject: Comments for pathway D0005 by WSPA

Comment:

See Attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/842-tier2lcfspathways-ws-ViFcKQBxBzVSC1c0.pdf>

Original File Name: WSPA Comment Letter\_RTE Ethanol CCS Pathway 2.19.20 \_Final Draft.pdf

Date and Time Comment Was Submitted: 2020-02-19 14:29:45

No Duplicates.

## Comment 36 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.

First Name: ANDY  
Last Name: APPAN  
Email Address: ANDY\_APPAN42@YAHOO.COM.SG  
Affiliation: AMARAPPAN

Subject: 50 % low carbon bus transport  
Comment:

LOW CARBON BUS TRANSPORT DESIGN:  
ONE-HALF ENGINE VOLUME, FUEL, CO<sub>2</sub>e for the same  
Ton-HP-Speed-Seat-Vehicle.  
Changes in design are in connecting rod and method of cranking of  
same crank shaft

Design	Ton	speed	HP	Fuel/hr	Fuel Lit	saved/yr	kmpl	Co <sub>2</sub> e	g/km	Cost \$	/100km	\$/p-	100km	Vehicle	Cost \$
Normal	15	100	240	20	Nil	5	480	20	0.5	100,000					
Low Carbon	15	100	240	10	72,000	10	240	10	0.25	110,000					
No Carbon	120	100	120	120	cbm	144,000	--	--	20	0.5	160,000				

BUS	40	SEAT	20	HOURS/DAY	RUN	360	DAYS	BUS	TRANSPORT	ON	DIESEL	COSTING	\$1/Lit	CO <sub>2</sub> e=	2400/KMPL	g/km.	FARE	1C/KM	IS	LOW.	CAN	GO	UPTO	2	C/KM
Design	Seat	Speed	Fuel	L/hr	Fuel	Lit	saved/yr	Fare	c/km	Revenue	\$/yr	Expense	\$/yr	Net	\$/yr	Vehicle	Cost	\$	R	O	I	%			
Normal	40	100	20	Nil	1	228,000	205,200	22,800	100,000	22.80%															
Low	Carbon	40	100	10	72,000	1	228,000	136,800	163,200	110,000	148.36%														
No Carbon	40	100	120																						
cbm	144,000	1	228,000	170,000	58,800	160,000	36.75%																		

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DESIGN ENGINEER  
Muthukal Andy Appan, M . E,  
55 yrs Expert, Chennai. India.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/843-tier2lcfspathways-ws-VjRSIVAiBAGLUIAg.pdf>

Original File Name: BUS PASSENGER TRANSPORT.pdf

Date and Time Comment Was Submitted: 2020-06-12 17:31:05

No Duplicates.

**Comment 37 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Phoebe  
Last Name: Seaton  
Email Address: pseaton@leadershipcounsel.org  
Affiliation: Leadership Counsel

Subject: App. B0059; California Bioenergy LLC and ABEC Bidart-Old River Dairy  
Comment:

To Whom it May Concern,

Please find attached comments in response to:  
Application B0059; California Bioenergy LLC and ABEC Bidart-Old  
River Dairy

from Leadership Counsel, Association of Irrigated Residents, Food  
and Water Watch, Central California Asthma Coalition, Central  
California Environmental Justice Network, and Center on Race,  
Poverty, and the Environment.

Thanks so much,

Phoebe

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/845-tier2lcfspathways-ws-VTZROFI+AD5XNAVr.pdf>

Original File Name: Comments\_B0059 California Bioenergy .pdf

Date and Time Comment Was Submitted: 2020-06-25 14:28:49

No Duplicates.

**Comment 38 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Phoebe

Last Name: Seaton

Email Address: pseaton@leadershipcounsel.org

Affiliation:

Subject: Comment Letter for Application B0089

Comment:

Please see attached document.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/847-tier2lcfspathways-ws-UjNWIAFwV2hRPgRn.pdf>

Original File Name: Application B0089\_ Gallo Cattle Company and Cottonwood Dairy.pdf

Date and Time Comment Was Submitted: 2020-06-25 15:31:56

No Duplicates.



**Comment 39 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Phoebe

Last Name: Seaton

Email Address: pseaton@leadershipcounsel.org

Affiliation:

Subject: Comment Letter Re Application B0098

Comment:

Please see attached letter commenting on Application B0098 by  
Calgren Dairy Fuels, LLC.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/849-tier2lcfspathways-ws-UTIFYgBtBTEEcFM2.pdf>

Original File Name: Calgren Dairy Fuels LCFS.pdf

Date and Time Comment Was Submitted: 2020-06-26 11:02:59

No Duplicates.

**Comment 40 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Lyle  
Last Name: Schlyer  
Email Address: lschlyer@calgren.com  
Affiliation:

Subject: Comment 1 Response  
Comment:

Included in this submission is the Calgren Dairy Fuels, LLC  
response to Comment 1.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/850-tier2lcfspathways-ws-BmVUPQBsV2kGZQBu.pdf>

Original File Name: Comment 1 Response.pdf

Date and Time Comment Was Submitted: 2020-06-28 16:00:19

No Duplicates.

**Comment 41 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Lyle  
Last Name: Schlyer  
Email Address: lschlyer@calgren.com  
Affiliation:

Subject: Comment 1 Response  
Comment:

Attached is the Calgren Dairy Fuels, LLC response to "Comment 1".

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/851-tier2lcfspathways-ws-BmUGb10xWGYGZQZo.pdf>

Original File Name: Comment 1 Response.pdf

Date and Time Comment Was Submitted: 2020-06-29 15:15:35

No Duplicates.

## **Comment 42 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Don

Last Name: Siefkes

Email Address: donsiefkes@aol.com

Affiliation: E100 Ethanol Group, Mendo Alcohol

Subject: LCFS pathway - tier2lcfspathways-ws

Comment:

The problem with the LCFS is that it nibbles around the edges of the problem which is massive new CO2 emissions from gasoline and diesel. Gasoline, by far is the largest single emitter of new CO2 and diesel for large over the road trucks is the 5th largest emitter. The simplest solution is for the ARB to ban the sale of any new light duty vehicle in CA that burns gasoline as the primary fuel (anything >2%) but don't specify what takes gasoline's place. Leave that decision up to car companies and consumers. Some would stay with EV's, but most car companies would rapidly convert to bio-fuel powered vehicles. Leave existing vehicles alone to live out their lives on gasoline. The same idea would work for large diesel trucks. No new ones that burn diesel made from crude oil. This is what we did with DDT, Freon 11, and leaded gasoline. We banned those materials, allowed current stocks to be used up, and left the decision on what to replace them with up to producers and consumers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-09-09 06:08:23

No Duplicates.

**Comment 43 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Shelby

Last Name: Neal

Email Address: shelby\_neal@yahoo.com

Affiliation:

Subject: Comments re: Kern Oil Pathway Applications

Comment:

Thank you for considering the National Biodiesel Board's comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/853-tier2lcfspathways-ws-UzhWNQNwWWQAWQlq.pdf>

Original File Name: Kern Co-Processing b 9-21-2020.pdf

Date and Time Comment Was Submitted: 2020-09-21 13:45:33

No Duplicates.

**Comment 44 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Stand Up to Factory Farms - Coalition Comments  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/854-tier2lcfspathways-ws-W2kHMQAzVjUELwQ0.pdf>

Original File Name: 2020-09-24 - Stand Up to Factory Farms - Comments on Application B0072 - Final.pdf

Date and Time Comment Was Submitted: 2020-09-24 08:52:59

No Duplicates.

**Comment 45 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Tom

Last Name: Frantz

Email Address: tom.frantz49@gmail.com

Affiliation: Association of Irrigated Residents

Subject: Tier 2 application #B0096

Comment:

Please accept the attached comments from the Association of Irrigated Residents

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/855-tier2lcfspathways-ws-UzECNFVkB4DM1V7.pdf>

Original File Name: B0096.pdf

Date and Time Comment Was Submitted: 2020-09-24 15:59:35

No Duplicates.

**Comment 46 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Tom

Last Name: Frantz

Email Address: tom.frantz49@gmail.com

Affiliation: Association of Irrigated Residents

Subject: Tier 2 application #B0097

Comment:

Please accept the attached comments on behalf of the Association of Irrigated Residents.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/856-tier2lcfspathways-ws-UDJY1VkVz0CMwUr.pdf>

Original File Name: B0097.pdf

Date and Time Comment Was Submitted: 2020-09-24 16:02:03

No Duplicates.



**Comment 47 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Tom

Last Name: Frantz

Email Address: tom.frantz49@gmail.com

Affiliation: Association of Irrigated Residents

Subject: Tier 2 application #B0109

Comment:

Please accept the attached comments on behalf of the Association of Irrigated Residents.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/857-tier2lcfspathways-ws-BWdWYFNjA2BXaFJ8.pdf>

Original File Name: B0109.pdf

Date and Time Comment Was Submitted: 2020-09-24 16:06:25

No Duplicates.

**Comment 48 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Tom

Last Name: Frantz

Email Address: tom.frantz49@gmail.com

Affiliation: Association of Irrigated Residents

Subject: Tier 2 application #B0072

Comment:

Please accept the attached comments on behalf of the Association of Irrigated Residents and several other listed groups.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/858-tier2lcfspathways-ws-WjgFM1RIBWELP1R6.pdf>

Original File Name: B0072.pdf

Date and Time Comment Was Submitted: 2020-09-24 16:08:16

No Duplicates.

**Comment 49 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Comments - Application No. B0108  
Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/859-tier2lcfspathways-ws-UmBcalNgVzQCKQg4.pdf>

Original File Name: 2020-09-24 - ALDF Comments - Application B0108.pdf

Date and Time Comment Was Submitted: 2020-09-24 16:55:13

No Duplicates.

## **Comment 50 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine

Last Name: Ball-Blakely

Email Address: cblakely@aldf.org

Affiliation:

Subject: Comments - Application No. B0096

Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/860-tier2lcfspathways-ws-ATMhMV1uVjUHLAAw.pdf>

Original File Name: 2020-09-28 - ALDF et al. Comments - Application B0096.pdf

Date and Time Comment Was Submitted: 2020-09-28 16:05:29

No Duplicates.

## **Comment 51 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Comments - Application No. B0097  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/861-tier2lcfspathways-ws-UmAFM1VmA2AKIVV1.pdf>

Original File Name: 2020-09-28 - ALDF et al. Comments - Application B0097.pdf

Date and Time Comment Was Submitted: 2020-09-28 16:09:24

No Duplicates.

**Comment 52 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Comments - Application No. B0109  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/862-tier2lcfspathways-ws-BjRUYlxvA2BSeVRk.pdf>

Original File Name: 2020-09-28 - ALDF et al. Comments - Application B0109.pdf

Date and Time Comment Was Submitted: 2020-09-28 16:10:44

No Duplicates.

## **Comment 53 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

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

Subject: Temp FPC for Dairy Biogas to Hydrogen  
Comment:

ARB's staff document refers to hydrogen from SMR from LNG. This would indeed be a worst case; however, LH2 plants receive natural gas by pipeline. The change in CI would correspond to  
Base hydrogen - NG\_CI + RNG CI  
The CI of NG direct use and upstream is 71 g/MJ

In ARBs example, the CI would be  $185 - 71 - 150 = -36$  g/MJ  
For typical LH2 pathways,  $155 - 71 - 150 = -66$  g/MJ  
The average of these two values is -51 g/MJ, which is consistent with the proposed temporary FPC.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-11-12 08:11:19

No Duplicates.

## **Comment 54 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Alex

Last Name: Spataru

Email Address: aspataru@adeptgroup.net

Affiliation: UC Riverside

Subject: Checks and Balances

Comment:

There appears to be the possibility to inject non-biogenic methane into the power generation system if the digester is down or if somebody wanted to boost production. What checks and balances are there to insure that only biogenic methane derived energy receives LCFS credits??

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-11-17 15:30:35

No Duplicates.



**Comment 55 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Alex

Last Name: Spataru

Email Address: aspataru@adeptgroup.net

Affiliation: UC Riverside

Subject: Checks and Balances

Comment:

There appears to be the possibility to inject non-biogenic methane into the biomethane pipeline/s. What checks and balances are there to insure that only biogenic origin methane is injected in the pipeline??

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-11-17 16:03:29

No Duplicates.

**Comment 56 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Alex

Last Name: Spataru

Email Address: aspataru@adeptgroup.net

Affiliation: UC Riverside

Subject: Checks and Balances

Comment:

Application # B0106 California Bioenergy (B194) California  
What checks and balances are there to insure that only biogenic  
methane is used to produce electricity on site?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-11-17 16:09:24

No Duplicates.

**Comment 57 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Alex

Last Name: Spataru

Email Address: [aspataru@adeptgroup.net](mailto:aspataru@adeptgroup.net)

Affiliation: UC Riverside

Subject: Checks and Balances

Comment:

Application # B0104, CalBio ABEC#3 Lakeview Farms Dairy Biogas

What checks and balances are there to insure that only biogenic methane is used to power the generator or is processed for transportation fuel in California?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-11-17 16:21:29

No Duplicates.

## **Comment 58 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Ranji  
Last Name: George  
Email Address: h2zevforum@gmail.com  
Affiliation:

Subject: LCFS regulation  
Comment:

To ARB Governing Board, management and staff

Please consider providing LCF credits to the electricity needed to liquefy dispensed hydrogen fuel. Since its so intimately involved with increasing the hydrogen ZEV range, and is actually dispensed, ARB should give at least partial LCF credits to facilitate liquid H2 fueling. It is a fundamental part of emerging H2 fueling infrastructure.

In general, even though ARB and CEC have expressed itself to be neutral to ZEV funding stating that either battery EVs and Hydrogen EVs can qualify - 80 percent of the state funding since year 2000 have gone towards batteries. That is for every \$1 of funding in hydrogen ZEVs, about 4 times have gone to battery ZEVs.

In total, according to San Diego Tribune (or Union?), the total ZEV incentives have been 2.5 billion. What it fails to notice, how hydrogen ZEVs got only a small fraction. Because of this sustained funding, battery ZEVs are now way ahead of hydrogen ZEVs. This is inconsistent with "neutrality".

Hydrogen ZEVs have numerous benefits - including longer range, faster recharging, and none of the toxic chemicals inherent in battery packs. The latter chemicals are mined in disadvantaged areas in the world, and then ultimately will be recycled in such areas within USA or abroad. Hydrogen ZEVs avoid that.

So please make up for the lack of funding for Hydrogen ZEVs by increasing dramatically the focus on the hydrogen fueling.

California is recognized as the world leader in both technologies. Within California, it was the author (in the early 90s) as the lead scientist at SCAQMD - regional air quality agency in Southern California - that started California's movement towards battery EVs, and later hydrogen EVs. We launched and treated both ZEV technologies fairly - but unfortunately ARB has shown sustained bias. Please correct this bias.

Yours truly  
Ranji George

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-11-24 16:47:03

No Duplicates.

## **Comment 59 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Doug

Last Name: Verboon

Email Address: doug.verboon@co.kings.ca.us

Affiliation:

Subject: B104 Application Question

Comment:

My name is Doug Verboon, and I am currently the Chairman of the Board of Supervisors in Kings County. I am writing in response to applications B104, B105, and B106, published on your website for public comment. According to public data, the dairy digesters affiliated with these three applications are currently selling their power output to the local utilities under the Bioenergy Market Adjusting Tariff (BioMAT). The CPUC-approved language of the BioMAT contract requires generators to turn over to the purchasing utility all Renewable Energy Credits (RECs, aka Green Tags) associated with the power generated. However, the LCFS program requires any RECs used for vehicle fueling need to be retired by the pathway holder, to prevent double counting. Given these two conflicting requirements for RECs, how has CARB determined that no double counting is occurring? I represent Kings County, which has multiple BioMAT generators and would like to know what public, transparent process might exist (if any) that would enable my constituents to participate in both programs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-11-25 14:22:19

No Duplicates.

## **Comment 60 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Doug

Last Name: Verboon

Email Address: doug.verboon@co.kings.ca.us

Affiliation:

Subject: B105 Application Question

Comment:

My name is Doug Verboon, and I currently sit as the Chairman of the Board for the Kings County Board of Supervisors. I am writing in response to applications B104, B105, and B106, published on your website for public comment. According to public data, the dairy digesters affiliated with these three applications are currently selling their power output to the local utilities under the Bioenergy Market Adjusting Tariff (BioMAT). The CPUC-approved language of the BioMAT contract requires generators to turn over to the purchasing utility all Renewable Energy Credits (RECs, aka Green Tags) associated with the power generated. However, the LCFS program requires any RECs used for vehicle fueling need to be retired by the pathway holder, to prevent double counting. Given these two conflicting requirements for RECs, how has CARB determined that no double counting is occurring? I represent Kings County, which has multiple BioMAT generators and would like to know what public, transparent process might exist (if any) that would enable my constituents to participate in both programs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-11-25 14:26:25

No Duplicates.

## **Comment 61 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Doug  
Last Name: Verboon  
Email Address: doug.verboon@co.kings.ca.us  
Affiliation:

Subject: B106 Application Question  
Comment:

My name is Doug Verboon, and I currently sit as the Chairman of the Board for the Kings County Board of Supervisors. I am writing in response to applications B104, B105, and B106, published on your website for public comment. According to public data, the dairy digesters affiliated with these three applications are currently selling their power output to the local utilities under the Bioenergy Market Adjusting Tariff (BioMAT). The CPUC-approved language of the BioMAT contract requires generators to turn over to the purchasing utility all Renewable Energy Credits (RECs, aka Green Tags) associated with the power generated. However, the LCFS program requires any RECs used for vehicle fueling need to be retired by the pathway holder, to prevent double counting. Given these two conflicting requirements for RECs, how has CARB determined that no double counting is occurring? I represent Kings County, which has multiple BioMAT generators and would like to know what public, transparent process might exist (if any) that would enable my constituents to participate in both programs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2020-11-25 14:29:45

No Duplicates.



**Comment 62 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Comments in Opposition to Certification of the Proposed New Temporary Pathway  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/874-tier2lcfspathways-ws-VmQFMwMwAGMAK1Jj.pdf>

Original File Name: 2020-12-21 - LCFS Comments - Final.pdf

Date and Time Comment Was Submitted: 2020-12-21 15:35:40

No Duplicates.

**Comment 63 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Jamie

Last Name: Katz

Email Address: jbkatz@leadershipcounsel.org

Affiliation:

Subject: Comments for B0127

Comment:

See attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/875-tier2lcfspathways-ws-Uz9TNl06VnYCWwhr.pdf>

Original File Name: LCFS Comments for B0127.pdf

Date and Time Comment Was Submitted: 2020-12-23 16:39:19

No Duplicates.

**Comment 64 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

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

**Comment 65 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Roel

Last Name: Hammerschlag

Email Address: roel@hammerschlag.llc

Affiliation: Hammerschlag LLC

Subject: Comments on LCFS pathway application B0123, applicant ID S283

Comment:

See attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/878-tier2lcfspathways-ws-AGIHMVRkVzZQZQVa.pdf>

Original File Name: B0123 Hammerschlag LLC comments.pdf

Date and Time Comment Was Submitted: 2021-03-09 10:51:15

No Duplicates.

**Comment 66 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: James  
Last Name: Pfeiffer  
Email Address: pfeifferjr@aol.com  
Affiliation: Green Waste Energy, LLC

Subject: Certification as a Renewable Fuel  
Comment:

Green Waste Energy (GWE) uses pyrolysis to process calorific waste into a synthetic or renewable gas. Normally, this gas is used as a fuel in engines to make electricity. This gas can be further processed via Fischer-Tropsch into ULSD and naphtha. Will this naphtha qualify as a 'renewable fuel' in California?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-03-23 17:17:27

No Duplicates.

**Comment 67 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Randall

Last Name: Meador

Email Address: randallp.meador@gmail.com

Affiliation:

Subject: Tier 2 Pathways

Comment:

I am opposed to transporting diesel and naphtha by ocean tanker. I support America and California being totally oil self sufficient.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-03-24 14:02:27

No Duplicates.

## **Comment 68 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Jamie

Last Name: Katz

Email Address: jbkatz@leadershipcounsel.org

Affiliation:

Subject: Comments on B0148

Comment:

Please find attached comments from Leadership Counsel for Justice and Accountability, Food and Water Watch, and Public Justice.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/881-tier2lcfspathways-ws-BWkGY1YxBycEXQd3.pdf>

Original File Name: LCFS Pathway Comments B0148.pdf

Date and Time Comment Was Submitted: 2021-03-29 16:37:55

No Duplicates.

**Comment 69 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Jamie

Last Name: Katz

Email Address: jbkatz@leadershipcounsel.org

Affiliation:

Subject: Comments on B0163 from Leadership Counsel for Justice and Accountability

Comment:

Comment is attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/882-tier2lcfspathways-ws-BmpTNl06AyNSC1Az.pdf>

Original File Name: LCFS Comment Letter Application B0163 6\_2\_21.pdf

Date and Time Comment Was Submitted: 2021-06-02 11:48:16

No Duplicates.



## **Comment 70 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Patrick  
Last Name: Harrington  
Email Address: pharrington@crowniron.com  
Affiliation: Crown Iron Works

Subject: B017901: Tier 2 pathway for Renewable Diesel (RND) from Distillers' Corn Oil  
Comment:

Hello,

This is in reference to B017901: Tier 2 pathway for Renewable Diesel (RND) from Distillers' Corn Oil (003) Fuel Producer: Neste Singapore Pte Ltd (4137)

It seems that exporting Distillers' Corn Oil (and other fats/oils) from North America across the ocean to Singapore, only to ship it back across the ocean to California for LCFS credits goes against the heart of reducing carbon footprint. A simple gut check

While the carbon intensity score may reflect the additional ocean freight and still prove economical for Neste, it seems there should be a greater CI score penalty for such significant transport distances. Not only for the substantial ocean freight, but also considering the additional truck/rail transport by the aggregator of Distiller's Corn Oil from the Midwest to the Coast.

Thanks,  
Patrick Harrington

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-06-11 06:51:35

No Duplicates.

**Comment 71 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Jamie

Last Name: Katz

Email Address: jbkatz@leadershipcounsel.org

Affiliation:

Subject: LCJA LCFS Comment on application B0166

Comment:

Comments are attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/884-tier2lcfspathways-ws-B2sFYFA7UWMBWFI+.pdf>

Original File Name: LCJA LCFS Comment on application B0166.pdf

Date and Time Comment Was Submitted: 2021-06-17 14:07:01

No Duplicates.

## **Comment 72 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Clark

Last Name: Li

Email Address: clark0844@sina.com

Affiliation:

Subject: A simple question towards regulations on jet fuel

Comment:

To whom it may concern,  
According to LCFS, traditional jet fuel is not under the regulations. So what's the reason that it is excluded from LCFS while alternative jet fuels are regulated?  
Many thanks.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-08-03 01:19:27

No Duplicates.

**Comment 73 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Ira

Last Name: Dassa

Email Address: idassa@airlines.org

Affiliation: Airlines for America (A4A)

Subject: Temporary Pathway for Alternative Jet Fuel

Comment:

Please see the attached letter for A4A's comments on the July 30, 2021, proposal to update the temporary pathway for alternative jet fuel.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/887-tier2lcfspathways-ws-WjsHNVQ0V1tRNAFu.pdf>

Original File Name: A4A Comments on CARB Proposed Update to Temporary Pathway for AJF-filed-8-20-2021.pdf

Date and Time Comment Was Submitted: 2021-08-20 10:39:33

No Duplicates.

## **Comment 74 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Kevin

Last Name: Hamilton

Email Address: kevin.hamilton@centralcalasthma.org

Affiliation: CENTRAL CALIFORNIA ASTHMA COLLABORATIVE

Subject: LCFS pathway applications B01741-3 inclusive

Comment:

Central California Asthma Collaborative opposes approval of these three applications for three reason:

1) POET continues to utilize energy derived from coal fired powerplant generated steam. ARB should no longer accept these CI "adjustments" that go against its stated position that no energy from coal or other carbon intensive processes shall be included in the renewable energy portfolio unless it is approved through the RPS summary to CEC and CPUC. SBX1-2(2011) SB 350 (2015) and SB 100 (2018) have clarified this position. Until the RPS has completed the CPUC regulatory process and this additional carbon source included, it should not be added.

2) List the FPC as TBD with the explanation that staff have somehow modeled it but that modeling is not reflected in the ARB's page attachment "Life Cycle Emissions" report is troubling and again, the application held until this is clarified.

3) In the ARB's page attachment "POET Biorefining - Big Stone Big Stone, South Dakota

Simplified Calculator for Starch and Fiber Ethanol (B0174)" ARB's hyperlink (

<https://ww2.arb.ca.gov/resources/documents/lcfs-life-cycle-analysismodels-and-documentation>)

to this so-called "simplified calculator" leads to a dead end "page not found" message and so is impossible to comment on.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-07 17:04:46

No Duplicates.

**Comment 75 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Kevin

Last Name: Hamilton

Email Address: kevin.hamilton@centralcalasthma.org

Affiliation: CENTRAL CALIFORNIA ASTHMA COLLABORATIVE

Subject: B0173 DF-AP #1, LLC (C1122); Idaho B017301 Big Sky Ranch

Comment:

Central California Asthma Collaborative opposed the (provisional) approval of dairy digester gas for transportation purposes as a candidate for LCFS eligibility.

CPUC and the CA state legislature have yet to settle the issue of whether this gas will be included for either RPS inventory inclusion, if included what the targets are.

Those same entities have yet to agree that this source of transportation fuel is eligible for LCFS program entry.

Last but not least, the AB 1383 recommendations clearly recommends that should these decisions by the legislature and agencies be made in favor of adding the source to the LCFS program, preference of CA based digester produced gas over that from out of state be mandated.

Therefore any action, provisional or otherwise, on the part of ARB is premature.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-07 17:23:19

No Duplicates.

**Comment 76 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Comments in Opposition to Tier 2 Pathway Application No. B0173  
Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/890-tier2lcfspathways-ws-ADJQZlRnBWdXfAg4.pdf>

Original File Name: 2021-09-08 - Comments - Application B0173.pdf

Date and Time Comment Was Submitted: 2021-09-08 11:59:20

No Duplicates.

## **Comment 77 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Sybil  
Last Name: Cramer  
Email Address: sybilcramer@mac.com  
Affiliation: Los Altos HS PTA Sustainability Committe

Subject: GHG from CNG  
Comment:

Honorable Board Members,

Re: Any vehicle use of these imported CNG fuels from other states

Although CNG does not cause air pollution and is thus considered a clean (meaning clean air) fuel which is a step above vehicles that burn gasoline, vehicles fueled by CNG nevertheless do emit Green House Gases.

In light of this information, I would like to suggest trading in any fleet or other vehicles that are currently burning CNG to be replaced by electric vehicles - and reduce the quantity of CNG being imported.

Thank you for reading my comment.  
Sybil Cramer

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-09-08 21:10:04

No Duplicates.



**Comment 78 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Brian  
Last Name: McDonald  
Email Address: bcmcdonald@marathonpetroleum.com  
Affiliation:

Subject: Proposed Temporary Pathways  
Comment:

See attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/892-tier2lcfspathways-ws-B2pcKlAyWFQCaAFi.pdf>

Original File Name: MPC\_LCFS Temporary pathway co-processing comments.pdf

Date and Time Comment Was Submitted: 2021-09-15 12:26:05

No Duplicates.

**Comment 79 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Brian  
Last Name: McDonald  
Email Address: bcmcdonald@marathonpetroleum.com  
Affiliation:

Subject: Proposed Temporary Pathways  
Comment:

See attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/893-tier2lcfspathways-ws-Uz4AdlMxBAgAalU2.pdf>

Original File Name: MPC\_LCFS Temporary pathway co-processing comments.pdf

Date and Time Comment Was Submitted: 2021-09-15 12:26:05

No Duplicates.

**Comment 80 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Comments in Opposition to Application B0197  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/894-tier2lcfspathways-ws-VWcANl1uUDJXfFdn.pdf>

Original File Name: 2021-09-22 - Comments in Opposition to Application B0197.pdf

Date and Time Comment Was Submitted: 2021-09-22 12:30:31

No Duplicates.

**Comment 81 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Comments in Opposition to Application B0214  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/895-tier2lcfspathways-ws-AjAGMAY1WTsLIAAw.pdf>

Original File Name: 2021-09-28 - ALDF Comments - Application B0214 - Milford, Utah.pdf

Date and Time Comment Was Submitted: 2021-09-28 13:59:20

No Duplicates.

## **Comment 82 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine

Last Name: Ball-Blakely

Email Address: cblakely@aldf.org

Affiliation:

Subject: Comments in Opposition to Application B0175

Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/896-tier2lcfspathways-ws-WmgANiFiAmADKAiy.pdf>

Original File Name: 2021-09-28 - ALDF Comments - Application B0175 - Point Reyes Station, California.pdf

Date and Time Comment Was Submitted: 2021-09-28 14:07:05

No Duplicates.

**Comment 83 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Comments in Opposition to Application B0185  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/897-tier2lcfspathways-ws-UGIGMFxvWDoLIAAw.pdf>

Original File Name: 2021-09-28 - Comments - Application B0185 - Tulare, California.pdf

Date and Time Comment Was Submitted: 2021-09-28 14:13:22

No Duplicates.

**Comment 84 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Comments in Opposition to Application B0198  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/898-tier2lcfspathways-ws-VWdQZlxvUzEFLgY2.pdf>

Original File Name: 2021-09-28 - Comments - Application B0198 - Bakersfield, California.pdf

Date and Time Comment Was Submitted: 2021-09-28 14:19:32

No Duplicates.

## **Comment 85 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Jamie

Last Name: Katz

Email Address: jbkatz@leadershipcounsel.org

Affiliation:

Subject: Comments on pathway application

Comment:

Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/899-tier2lcfspathways-ws-VTYFbARoAD4FZgRq.pdf>

Original File Name: Comments on LCFS application B0198.pdf

Date and Time Comment Was Submitted: 2021-09-28 15:56:30

No Duplicates.



**Comment 86 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Jamie

Last Name: Katz

Email Address: jbkatz@leadershipcounsel.org

Affiliation:

Subject: Comments on pathway application

Comment:

Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/900-tier2lcfspathways-ws-VjVT0IU5UG4KaQZo.pdf>

Original File Name: Comments on LCFS application B0185.pdf

Date and Time Comment Was Submitted: 2021-09-28 15:58:28

No Duplicates.

**Comment 87 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Roel

Last Name: Hammerschlag

Email Address: roel@hammerschlag.llc

Affiliation: Hammerschlag LLC

Subject: LCFS Tier 2 Pathway Application B0207

Comment:

See uploaded file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/903-tier2lcfspathways-ws-VzVWYAQ3BGcGNw1W.pdf>

Original File Name: B0207 Hammerschlag LLC comments.pdf

Date and Time Comment Was Submitted: 2021-12-11 19:33:47

No Duplicates.

**Comment 88 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Tyler  
Last Name: Lobdell  
Email Address: tlobdell@fwwatch.org  
Affiliation: Food & Water Watch

Subject: Comments in opposition  
Comment:

Please find comments from Food & Water Watch, Association of Irrigated Residents, Leadership Counsel for Justice & Accountability, and Public Justice attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/904-tier2lcfspathways-ws-VGYFMwc0VDYLIwAx.pdf>

Original File Name: 2021.12.14\_Opposition comment to App No. B0220.pdf

Date and Time Comment Was Submitted: 2021-12-14 14:30:01

No Duplicates.

**Comment 89 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Dan  
Last Name: Sakaguchi  
Email Address: dan@cbeal.org  
Affiliation: Communities for a Better Environment

Subject: Comments re: Application No. B0241 for Three Low-Carbon Fuel Standard Tier 2 Fuel Pathways  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/905-tier2lcfspathways-ws-BXVdbVRjBAhWPABj.pdf>

Original File Name: P66 LCFS T2 Provisional Pathway Application\_Comment-compressed.pdf

Date and Time Comment Was Submitted: 2021-12-17 12:47:57

No Duplicates.

**Comment 90 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Tyler  
Last Name: Lobdell  
Email Address: tlobdell@fwwatch.org  
Affiliation: Food & Water Watch

Subject: Coalition Comments in Opposition to Application B0207  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/906-tier2lcfspathways-ws-ATNcaldkA2ECKIJj.pdf>

Original File Name: 2021.12.20 - Comment on LCFS App. B0207 - Final.pdf

Date and Time Comment Was Submitted: 2021-12-20 12:21:32

No Duplicates.

**Comment 91 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Tyler  
Last Name: Lobdell  
Email Address: tlobdell@fwwatch.org  
Affiliation: Food & Water Watch

Subject: Opposition comment  
Comment:

Please find comments from Food & Water Watch, Association of Irrigated Residents, Leadership Counsel for Justice & Accountability, and Public Justice attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/907-tier2lcfspathways-ws-AjAANINgUDJSelNi.pdf>

Original File Name: 2021.12.21\_Comment on LCFS app B0218.pdf

Date and Time Comment Was Submitted: 2021-12-21 15:34:39

No Duplicates.

**Comment 92 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Tyler  
Last Name: Lobdell  
Email Address: tlobdell@fwwatch.org  
Affiliation: Food & Water Watch

Subject: Opposition comment  
Comment:

Please find comments from Food & Water Watch, Association of Irrigated Residents, Leadership Counsel for Justice & Accountability, Animal Legal Defense Fund, and Public Justice attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/908-tier2lcfspathways-ws-V2UGMFFiAGIKIgc2.pdf>

Original File Name: 2021.12.21\_Comment on LCFS app B0242.pdf

Date and Time Comment Was Submitted: 2021-12-21 15:54:14

No Duplicates.

**Comment 93 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Evan  
Last Name: Edgar  
Email Address: [evan@edgarinc.org](mailto:evan@edgarinc.org)  
Affiliation:

Subject: Comments  
Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/909-tier2lcfspathways-ws-VDdTNFQnBzYDWIU2.pdf>

Original File Name: CARB CI LCFS Jan 2022 .pdf

Date and Time Comment Was Submitted: 2022-01-04 08:03:26

No Duplicates.



**Comment 94 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine

Last Name: Ball-Blakely

Email Address: cblakely@aldf.org

Affiliation:

Subject: Coalition Comments in Opposition to Application B0280

Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/910-tier2lcfspathways-ws-VWcBN1VmUTBSelV1.pdf>

Original File Name: 2022.01.24\_Comment on LCFS app B0280.pdf

Date and Time Comment Was Submitted: 2022-01-24 11:53:50

No Duplicates.

## **Comment 95 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Stephen

Last Name: Rosenblum

Email Address: poll@rosenblums.us

Affiliation:

Subject: Low Carbon Fuel Standard (LCFS) Tier 2 Pathways -Public Comment  
Comment:

As a California taxpayer, I strongly object to California taxes being used to subsidize projects in Wisconsin which involve sending bio-gas via pipeline to Arizona, liquefying it, and trucking it to California. Such funds should be used to set up California dairies with this technology so we can avoid the environmental deficits of long distance transport and liquefaction. The gas should be piped directly from dairies in California to the eventual consumers in our state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-02-26 18:06:31

No Duplicates.

**Comment 96 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: David  
Last Name: Page  
Email Address: dalpage5@gmail.com  
Affiliation: Mr. and Mrs.

Subject: tier21cfspathways  
Comment:

I strongly object to subsidizing projects in Wisconsin which involve sending bio-gas via pipeline to Arizona, liquefying it, and trucking it to California.

The gas should be piped directly from dairies within California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-03-02 14:46:35

No Duplicates.

**Comment 97 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine

Last Name: Ball-Blakely

Email Address: cblakely@aldf.org

Affiliation:

Subject: Coalition Comments in Opposition to Application B0215

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/918-tier2lcfspathways-ws-BTcAN11uUzJReVJi.pdf>

Original File Name: 2022.03.11 - Coalition Comments in Opposition to B0215 - Rosendale.pdf

Date and Time Comment Was Submitted: 2022-03-11 10:45:21

No Duplicates.

**Comment 98 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0216  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/919-tier2lcfspathways-ws-BTdVY1ZlA2ILlWY2.pdf>

Original File Name: 2022.03.11 - Coalition Comments in Opposition to B0216 - Kinnard.pdf

Date and Time Comment Was Submitted: 2022-03-11 10:51:10

No Duplicates.

**Comment 99 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Comments in Opposition to Application B0217  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/920-tier2lcfspathways-ws-VmQFMwQ3VzYGLgk5.pdf>

Original File Name: 2022.03.11 - Coalition Comments in Opposition to B0217 - New Chester.pdf

Date and Time Comment Was Submitted: 2022-03-11 10:55:02

No Duplicates.

**Comment 100 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Stephen

Last Name: Rosenblum

Email Address: ol1@rosenblums.us

Affiliation:

Subject: Comment on an application by Vaquero Energy,

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/922-tier2lcfspathways-ws-AGMFbARoBDpRMgBu.docx>

Original File Name: Comments regarding Vaquero project for LCFS credits.docx

Date and Time Comment Was Submitted: 2022-03-11 14:21:42

No Duplicates.

**Comment 101 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Adam  
Last Name: Voskuil  
Email Address: avoskuil@midwestadvocates.org  
Affiliation: Midwest Environmental Advocates

Subject: Objection to Kinnard Farms' Application to the LCFS Tier 2 Pathways Program  
Comment:

Thank you for the opportunity to comment on Kinnard Farms' application to join the Low Carbon Fuel Standard (LCFS) Tier 2 Pathways program. We write to encourage the California Air Resources Board (CARB) to deny Kinnard Farms' application.

Applicant IDs 6545 & 71003

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/923-tier2lcfspathways-ws-Uj8GaVI3UnYCYQV2.zip>

Original File Name: Midwest Environmental Advocates.zip

Date and Time Comment Was Submitted: 2022-03-11 16:05:35

No Duplicates.



**Comment 102 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Joseph  
Last Name: Williams  
Email Address: joew3657@gmail.com  
Affiliation:

Subject: 2022 Aultrafine 03 Particulate  
Comment:

Good Afternoon C.A.R.B STAFF, MY NAME is Joseph Williams a Stake holde,I have a project for Low-carban fuel Producers for Aultrafine 0.3 Particulate, this system TRAP Particulate Altrafine 0.3 in its Cells, The project itself will manage Ter2 pathway description application no.B0268 ALT AIR PARAMOUNT,LLC,(6281) California B026801:Fuel Producer:Altair Paramount,LLC,(83180 North American Sourced Renewable Diesel plant in Paramount ,California;Natural gas,Grid electricity,and hydrogen,renewable Diesel Produced in California Provisional B026803 Fuel Producer:Altair Paramount,LLC (6281);facility name Altair paramount,LLC (83180); Site specfic rendered Australia Sourced Animal fat transported by tanker and ocean tanker to renewable Diesel plant in Paramount California;Natural gas grid electricity

And hydrogen renewable Diesel Produced in California Provisional B026803 ;Fuel Producer:Altair Paramount,LLC (6281);facility name Altair Paramount,LLC ((83180);Site specfic rendered Australia Sourced Animal fat transported by tanker and ocean tanker to renewable Diesel plant in California Provisional B026803:LLC (6281);facility name:Altair Paramount,LLC (83180);Site specfic rendered Australia Sourced Animal fat Sourced from JBS Greeley Colorado transported by rail,California Natural gas, Grid electricity and hydrogen;Renewable Diesel Produced in California Provisional B026803 Fuel.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-03-12 12:53:25

No Duplicates.

**Comment 103 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Joshua  
Last Name: Kehoe  
Email Address: kehoej1@gmail.com  
Affiliation: Private Individual

Subject: Application No B0251  
Comment:

Dear CARB Personnel:

I appreciate the opportunity to provide public comment on the various pathways proposed by DGD. I looked forward to reading the Lifecycle Analysis Report. It was a very quick read, as reading large sections of blacked out "CBI" doesn't take a lot of time or effort. While I understand DGD's desire to not release certain data, they even blacked out the "simplified process" diagram as well as pretty much anything that is interesting. For instance, what rough percentage of finished product will be transported to California by ocean-going tanker versus by rail? Which mode of transport results in a higher CI score for any given feedstock? It appears the listed CI score they calculate will default to the highest of the calculated CI scores for any given feedstock, but it would be interesting to see just how much a real-world difference it makes. Oh well, more curiosity on my part than anything earth-shattering. I again appreciate the opportunity to leave comments.

Sincerely,  
Josh Kehoe

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-03-15 15:14:06

No Duplicates.

**Comment 104 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Comments in Opposition to Application B0283  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/926-tier2lcfspathways-ws-BTdcalVmA2JVfgEx.pdf>

Original File Name: 2022-06-21 - Coalition Comments in Opposition to B0283 - Wisconsin - FINAL.pdf

Date and Time Comment Was Submitted: 2022-06-21 16:26:04

No Duplicates.

**Comment 105 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0307  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/927-tier2lcfspathways-ws-UmAFMwY1WDkELwk5.pdf>

Original File Name: 2022-06-23 - Coalition Comments in Opposition to B0307 - CalBio Hanford - FINAL.pdf

Date and Time Comment Was Submitted: 2022-06-23 16:48:35

No Duplicates.

**Comment 106 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0310  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/928-tier2lcfspathways-ws-BjRVYwMwB2YAKwc3.pdf>

Original File Name: 2022-06-23 - Coalition Comments in Opposition to B0310 - CalBio Visalia - FINAL.pdf

Date and Time Comment Was Submitted: 2022-06-23 16:51:38

No Duplicates.

**Comment 107 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Tyler  
Last Name: Lobdell  
Email Address: tlobdell@fwwatch.org  
Affiliation:

Subject: Comments in opposition  
Comment:

Please find our coalition comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/929-tier2lcfspathways-ws-VmRQZlZlVzYFLQMz.pdf>

Original File Name: 2022.06.24\_Coalition comments to B0250.pdf

Date and Time Comment Was Submitted: 2022-06-24 14:14:50

No Duplicates.

**Comment 108 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0308  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/931-tier2lcfspathways-ws-WmhSZFBjA2IAKwAw.pdf>

Original File Name: 2022-06-29 - Coalition Comments in Opposition to B0308 - Arizona - Final.pdf

Date and Time Comment Was Submitted: 2022-06-29 15:25:06

No Duplicates.

**Comment 109 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Don

Last Name: Siefkes

Email Address: donsiefkes@aol.com

Affiliation: Non-profit Educational E100 Ethanol Grp

Subject: LCFS

Comment:

Really, this is totally unnecessary. LCFSS help a little, but the truth is they will only hold down the rate of increase of CO2 emissions, not the absolute amount. Gasoline and diesel usage keep increasing with population vehicle growth. The best answer would be to ban the sale of new diesel and gasoline powered vehicles in CA beginning with model year 2028 and let existing vehicles live out their lives on gasoline or diesel. This is not the same thing as mandating ZEVs. The banning of new fossil fuel powered vehicles lets consumers buy as many EVs and H2s as they want, but also permits the sale of bio-ethanol or other bio-fuel powered vehicles which are truly net carbon zero.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-07-15 16:35:16

No Duplicates.



**Comment 110 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Comments in Opposition to Application B0348  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/937-tier2lcfspathways-ws-ATNda1NgB2ZSeVNj.pdf>

Original File Name: 2022-07-25 - Coalition Comments in Opposition to B0348.pdf

Date and Time Comment Was Submitted: 2022-07-25 16:57:15

No Duplicates.

**Comment 111 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Holly  
Last Name: Bainbridge  
Email Address: hbainbridge@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0350  
Comment:

Please see comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/938-tier2lcfspathways-ws-UGIBN1xvVDVRegIy.pdf>

Original File Name: 2022-07-26 - Coalition Comments in Opposition to B0350.pdf

Date and Time Comment Was Submitted: 2022-07-26 16:34:42

No Duplicates.

**Comment 112 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0373  
Comment:

Please see comments attached. Also, please note that we are submitting these past the deadline because we mis-calendared that date. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/939-tier2lcfspathways-ws-UmBRZ1RnBGVSeQk5.pdf>

Original File Name: 2022-07-26 - Coalition Comments in Opposition to B0373.pdf

Date and Time Comment Was Submitted: 2022-07-27 11:57:23

No Duplicates.

## **Comment 113 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Christine

Last Name: Ball-Blakely

Email Address: cblakely@aldf.org

Affiliation:

Subject: Coalition Comments in Opposition to Application B0360 - Applicant ID E426

Comment:

Please find comments attached. Also, please note that we are submitting them here to the general comment docket because the "Submit Comments" button appears to be missing. We also emailed them to ombcomm@arb.ca.gov.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/942-tier2lcfspathways-ws-VWcHMQEyBWQFLgEx.pdf>

Original File Name: 2022-08-23 - Coalition Comments in Opposition to B0360.pdf

Date and Time Comment Was Submitted: 2022-08-23 16:30:28

No Duplicates.

## **Comment 114 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Joseph  
Last Name: Williams  
Email Address: joew3657@gmail.com  
Affiliation:

Subject: Low Carbon fuel Standards  
Comment:

I believe that (L.C.F.S) ARE Effective for ter2 standards, and  
Believe that Aultrafine 0.3 Particulate Still comes from Tailpipe  
And can be Trapped in a Filter Trapped System will eliminate free  
Emissions Particulate before 2032, Our Atmosphere Can't wait for  
E.V Electric Vehicles Complete installation to Transportation a  
Lone, this Trapping Filter Can bring Stability to all disadvantage  
Community, By Retrofitting to Tailpipe during the Transition to the  
Electric Vehicles Clean Air tier2icfspathway .  
Joseph williams from J.W.ADVANCED IDEA'S.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-08-25 22:52:35

No Duplicates.

## **Comment 115 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Joseph  
Last Name: Williams  
Email Address: joew3657@gmail.com  
Affiliation: CLIMATE CHANGE

Subject: 2022 Aultrafine 03 Particulate & ter2lcfs pathway  
Comment:

Today's work on all efforts in ter2 LCFS IS GREAT for  
The fight against Climate change! I Believe that to Keep  
The State of California in the forefront of Combating Climate  
Change first, is to not slow down the transportation industry  
By Excluding Retrofitting Project itself, and start investing into  
Emissions Particulate Capture System for Combustion engines old and  
new, So the Rest of the nation can follow Suite, this is a true  
fight against CLIMATE CHANGE, this Nation Can't Afford to wait until  
(EVs) Electric Vehicles are built by the millions...  
The Emissions Particulate project Demands Actions now! We as the  
People need a Clean Atmosphere to live in, this Request for  
investment is Ginuwine, and will be put to Good use,  
Thank You  
Joseph williams  
J.W.ADVANCED  
TECHNOLOGY.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-09-14 11:15:31

No Duplicates.

**Comment 116 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0349  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/946-tier2lcfspathways-ws-Wmhda1BjVDVVfgMz.pdf>

Original File Name: 2022-09-19 - Coalition Comments in Opposition to B0349.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:03:53

No Duplicates.

**Comment 117 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0282  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/947-tier2lcfspathways-ws-WmgCNAEyWDkLIFdn.pdf>

Original File Name: 2022-09-19 - Coalition Comments in Opposition to B0282.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:11:32

No Duplicates.



**Comment 118 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0338  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/948-tier2lcfspathways-ws-WmhcalZIUDEAKwk5.pdf>

Original File Name: 2022-09-19 - Coalition Comments in Opposition to B0338.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:18:19

No Duplicates.

**Comment 119 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0346  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/949-tier2lcfspathways-ws-BzVTZVBjVTRVfgY2.pdf>

Original File Name: 2022-09-19 - Coalition Comments in Opposition to B0346.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:21:56

No Duplicates.

**Comment 120 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0353  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/950-tier2lcfspathways-ws-UmBVYwEyUTBWfQc3.pdf>

Original File Name: 2022-09-19 - Coalition Comments in Opposition to B0353.pdf

Date and Time Comment Was Submitted: 2022-09-19 16:25:29

No Duplicates.

**Comment 121 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Jamie

Last Name: Katz

Email Address: jbkatz@leadershipcounsel.org

Affiliation:

Subject: Comments on B0315

Comment:

Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/951-tier2lcfspathways-ws-VmRdawQ3A2ICKVBg.pdf>

Original File Name: 2022-09-\_\_ - Coalition Comments in Opposition to B0315 with Exhibits.pdf

Date and Time Comment Was Submitted: 2022-09-26 16:03:12

No Duplicates.

**Comment 122 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Jamie

Last Name: Katz

Email Address: jbkatz@leadershipcounsel.org

Affiliation:

Subject: Comments on B0311

Comment:

Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/952-tier2lcfspathways-ws-UmBWYFRnVjcCKQMz.pdf>

Original File Name: 2022-09-\_\_ - Coalition Comments in Opposition to B0311 with Exhibits.pdf

Date and Time Comment Was Submitted: 2022-09-26 16:04:44

No Duplicates.

**Comment 123 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0352  
Comment:

Please see comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/955-tier2lcfspathways-ws-VWdVY11uVjcKIQEw.pdf>

Original File Name: 2022-11-23 - Comments in Opposition to B0352 - Final.pdf

Date and Time Comment Was Submitted: 2022-11-23 15:51:39

No Duplicates.

**Comment 124 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0366  
Comment:

See the attached file

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/957-tier2lcfspathways-ws-UmBSZAQ3WThXfFdm.pdf>

Original File Name: 2022-11-29 ALDF et al. comments - Application B0366.pdf

Date and Time Comment Was Submitted: 2022-11-29 13:24:44

No Duplicates.

**Comment 125 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Comments in Opposition to Application B0385  
Comment:

Please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/958-tier2lcfspathways-ws-UWNRZ1BjBGVSeQk4.pdf>

Original File Name: 2022-12-08 - Comments in Opposition to B0385.pdf

Date and Time Comment Was Submitted: 2022-12-08 15:53:28

No Duplicates.



**Comment 126 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0391  
Comment:

See the attached document for comments on application B0391

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/960-tier2lcfspathways-ws-ATNSZFxvWTgHLAIz.pdf>

Original File Name: 2022-12-12 Coalition Comments in Opposition to Application B0391 - Wisconsin - Jerseyland Dairy.pdf

Date and Time Comment Was Submitted: 2022-12-12 13:36:23

No Duplicates.

**Comment 127 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0392  
Comment:

See the attached document for coalition comments in opposition to  
application B0392.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/962-tier2lcfspathways-ws-B2RROFc3UW4HaFUh.pdf>

Original File Name: Coalition Comments in Opp to App B0392.pdf

Date and Time Comment Was Submitted: 2022-12-13 08:52:01

No Duplicates.

**Comment 128 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0347  
Comment:

See the attached document for coalition comments in opposition to  
Tier 2 Application B0347

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/963-tier2lcfspathways-ws-VTYFbABgUW4Ea1Uh.pdf>

Original File Name: Coalition Comments in Opp. to App. B0347 12.16.22.pdf

Date and Time Comment Was Submitted: 2022-12-16 14:03:29

No Duplicates.

**Comment 129 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0345  
Comment:

See the attached document for coalition comments in opposition to  
Tier 2 Application B0345

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/966-tier2lcfspathways-ws-AmEGb1MzVWoAbwh8.pdf>

Original File Name: Coalition Comments in Opp. to App. B0345 12.16.22.pdf

Date and Time Comment Was Submitted: 2022-12-16 14:11:44

No Duplicates.

**Comment 130 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0371  
Comment:

Please see the attached document for coalition comments in  
opposition to application B0371.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/967-tier2lcfspathways-ws-UTIBaAdnVGsFagRw.pdf>

Original File Name: Coalition Comments in Opp to App B0371 12.21.22.pdf

Date and Time Comment Was Submitted: 2022-12-21 14:44:50

No Duplicates.

**Comment 131 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0370  
Comment:

Please see the attached document for coalition comments in  
opposition to application B0370.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/968-tier2lcfspathways-ws-BWZVPAFhAD9VOgB0.pdf>

Original File Name: Coalition Comments in Opp to App B0370 12.21.22.pdf

Date and Time Comment Was Submitted: 2022-12-21 14:51:10

No Duplicates.

## **Comment 132 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: William

Last Name: Brieger

Email Address: will.brieger@350sacramento.org

Affiliation: 350 Sacramento and Climate Action Calif

Subject: Application B 0420

Comment:

In recent years it has become increasingly clear that biogas and natural gas facilities and equipment can leak, in which case the carbon intensity is much worse than the fossil-based fuel it substitutes for. To ensure that this does not happen, the facility in the application (and all facilities in bio gas production), should be under heightened leak detection and repair protocols using frequent inspections and the best available technology, including infrared optical sensing or whatever car specifies as state of the art.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-02-24 16:57:34

No Duplicates.

**Comment 133 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Stephen

Last Name: Rosenblum

Email Address: poll@rosenblums.us

Affiliation: Climate Action California

Subject: Concerns about pollution under this permit

Comment:

The air pollution monitoring proposed under this permit is wholly inadequate for the San Joaquin Valley AQMD which is not in compliance with EPA standards for criteria air pollutants. There is only a once in 24 month measurement requirement under condition 19 of the air pollution permit "Source testing to measure NOx, CO, VOC, and ammonia (NH3) emissions from this unit shall be conducted at least once every 24 months. [District Rules 1081, 2201, and 4702]" To have a useful effect, monitoring needs to be continuous. To avoid this problem, methane fuel cells should have been chosen rather than a combustion driven generator.

Secondly, there is no requirement to measure methane leakage. If 10% of the methane were to leak this would completely invalidate any benefit to the climate of this activity. Please do not grant this application until these defects are remedied.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-03-07 19:40:56

No Duplicates.



## **Comment 134 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: WILLIAM

Last Name: BRIEGER

Email Address: will.brieger@gmail.com

Affiliation: 350 Sacramento

Subject: Suggested pathway approval conditions

Comment:

Dairy biogas poses at least two environmental threats that could be addressed by adding conditions on pathway approval.

1. There be a robust leak detection and repair protocol to find and immediately fix gas leaks from the processing and upgrading equipment. Otherwise the leaks cancel other emission reductions.

2. There be a condition that the dairy be operated in compliance with all local, state and federal environmental standards. Otherwise the dairy's neighbors are burdened by production of California fuel.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-03-12 10:03:55

No Duplicates.

**Comment 135 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

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

**Comment 136 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0369  
Comment:

See the attached document for comments in opposition to Tier 2  
Pathway application B0369

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/973-tier2lcfspathways-ws-WmhUYgc0WDhWfVJi.pdf>

Original File Name: 2023-03-14 - Coalition Comments in Opposition to App B0369 \_Idaho.pdf

Date and Time Comment Was Submitted: 2023-03-14 13:04:13

No Duplicates.

**Comment 137 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: Coalition Comments in Opposition to Application B0382  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/976-tier2lcfspathways-ws-UjFXPgBsAjxWNVA+.pdf>

Original File Name: Comments in Opposition to Application B0382 - Madera County.pdf

Date and Time Comment Was Submitted: 2023-03-21 15:46:06

No Duplicates.

**Comment 138 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0404  
Comment:

Please see the attached document for coalition comments in  
opposition to Tier 2 application B0404.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/977-tier2lcfspathways-ws-W2gGLVdkBWRVfINh.pdf>

Original File Name: 3-22-23 Coalition Comments in Opposition to App. B0404 - Washington.pdf

Date and Time Comment Was Submitted: 2023-03-22 13:51:14

No Duplicates.

**Comment 139 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0401  
Comment:

Please see the attached document for coalition comments in  
opposition to Tier 2 application B0401.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/978-tier2lcfspathways-ws-U2BUfAQ3UzRSeIbi.pdf>

Original File Name: 3.24.23 - Coalition Comments in Opposition to App B0401 - New York.pdf

Date and Time Comment Was Submitted: 2023-03-24 13:40:40

No Duplicates.

**Comment 140 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0393  
Comment:

Please see the attached document for coalition comments in  
opposition to Tier 2 application B0393.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/979-tier2lcfspathways-ws-VGcAKAMwA2RVfVNH.pdf>

Original File Name: 3.24.23 - Coalition Comments in Opposition to App B0393 - Wisconsin\_.pdf

Date and Time Comment Was Submitted: 2023-03-24 13:44:25

No Duplicates.

**Comment 141 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Jane

Last Name: O'Malley

Email Address: j.omalley@theicct.org

Affiliation:

Subject: Comments on LCFS Application No. B0430

Comment:

See comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/980-tier2lcfspathways-ws-Vj8GY1c1ACcLUlc0.pdf>

Original File Name: ICCT comments on Application No. B0430.pdf

Date and Time Comment Was Submitted: 2023-06-02 06:04:14

No Duplicates.



**Comment 142 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine

Last Name: Ball-Blakely

Email Address: cblakely@aldf.org

Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0430

Comment:

Please find coalition comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/981-tier2lcfspathways-ws-UDMFbFY6BTsBYgRq.pdf>

Original File Name: Comments on Tier 2 Application B0430.pdf

Date and Time Comment Was Submitted: 2023-06-05 16:02:12

No Duplicates.

**Comment 143 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0383  
Comment:

Please find comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/983-tier2lcfspathways-ws-WjlUPVA8WGYKaVI8.pdf>

Original File Name: Comments on Tier 2 Application B0383.pdf

Date and Time Comment Was Submitted: 2023-06-07 18:58:50

No Duplicates.

## **Comment 144 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws) - 2nd Workshop.**

First Name: Mike

Last Name: Keller

Email Address: mikekeller2@mac.com

Affiliation:

Subject: Carbon footprint??

Comment:

I find it highly objectionable to use fossil fuel to aggregate feedstock from California and elsewhere, ship it halfway across the country to be made into "renewable" diesel, shipped back to California to receive LCFS credits? The actual carbon footprint for this must be enormous. This undermines the spirit of LCFS credits and allows refineries in California to thumb their noses at CARB and carbon emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-06-14 15:53:17

No Duplicates.

**Comment 145 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Jean

Last Name: Tepperman

Email Address: jeantepper@gmail.com

Affiliation:

Subject: B039401: Fuel Producer: Chevron Products Company (5086) ; Facility Name: Chevron El Segundo  
Comment:

Please do not allow this misleading ploy of the fossil fuel industry to count as sustainable or low-carbon fuel. Producing and burning biofuels adds carbon dioxide and particulate pollutants to the air. In addition, producing feedstock for biofuel has led to deforestation and an increase in monocrop agriculture, both disastrous for the climate. Diverting agriculture to produce fuel also raises food prices and contributes to world hunger. Please do not allow this practice to provide any credits in the Low Carbon Fuel Standard. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-06-15 17:48:34

No Duplicates.

**Comment 146 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Florencia

Last Name: Goren

Email Address: fgoren@betalabservices.com

Affiliation: Beta Analytic

Subject: LCFS Application No. B0394

Comment:

Please find our comments in the attached document, thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/986-tier2lcfspathways-ws-B2tQNVQzAyMGXwVm.pdf>

Original File Name: LCFS Chevron El Segundo Pathway Comment.pdf

Date and Time Comment Was Submitted: 2023-06-21 06:16:52

No Duplicates.

**Comment 147 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0450  
Comment:

Attached are the coalition's comments in opposition to Tier 2  
application B0450.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/987-tier2lcfspathways-ws-BWZWPwFhVmlWOQN3.pdf>

Original File Name: Coalition Comments in Opposition to App B0450 - Wisconsin\_6.26.23.pdf

Date and Time Comment Was Submitted: 2023-06-26 14:22:38

No Duplicates.

**Comment 148 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0400  
Comment:

Attached are the coalition's comments in opposition to Tier 2  
application B0400.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/988-tier2lcfspathways-ws-VDdXPgRoU21WNVc5.pdf>

Original File Name: Comments in Opposition to App B0400 - New York\_6.26.23.pdf

Date and Time Comment Was Submitted: 2023-06-26 14:30:39

No Duplicates.

**Comment 149 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0438  
Comment:

Attached is the coalition's comment in opposition to Tier 2  
application B0438.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/989-tier2lcfspathways-ws-AWJQOVY6AD4FZgVr.pdf>

Original File Name: Comments in Opposition to App B0438\_Fresno\_California\_6.26.23.pdf

Date and Time Comment Was Submitted: 2023-06-26 14:39:12

No Duplicates.



**Comment 150 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0396  
Comment:

Attached are the coalition's comments in opposition to Tier 2  
application B0396.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/990-tier2lcfspathways-ws-UTJUPVA8WWcKaVI8.pdf>

Original File Name: Comments in Opposition to App B0396\_California\_Hanford\_6.27.23.pdf

Date and Time Comment Was Submitted: 2023-06-27 15:12:18

No Duplicates.

**Comment 151 for Public Comments for LCFS pathway applications (tier2lcspathways-ws)  
- 2nd Workshop.**

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

**Comment 152 for Public Comments for LCFS pathway applications (tier2lcfspathways-ws)  
- 2nd Workshop.**

First Name: Emily  
Last Name: Stewart  
Email Address: estewart@aldf.org  
Affiliation: Animal Legal Defense Fund

Subject: Coalition Comments in Opposition to Application B0403  
Comment:

Hello - attached are the coalition's correct comments in opposition to application B0403. I accidentally submitted the attachment for comments in opposition to B0396 in an earlier submission, but this is the correct attachment.

Thanks for your understanding,

-Emily

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/992-tier2lcfspathways-ws-AGNSO1IyAzxSPQZy.pdf>

Original File Name: Coalition Comments in Opposition to App B0403 - California\_Bakersfield\_6.27.23.pdf

Date and Time Comment Was Submitted: 2023-06-27 15:21:36

No Duplicates.

**There are no comments posted to Public Comments for LCFS pathway applications (tier2lcfspathways-ws) that were presented during the Workshop at this time.**