



May 31, 2007

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: 2007 Amendments to the Phase 3 California Reformulated Gasoline Regulations to be considered at Air Resources Board public hearing on June 14, 2007.

Dear Sir or Madam:

On behalf of the members of the Renewable Fuels Association (RFA), the national representative for the U.S. ethanol industry, I am pleased to submit the following comments relative to the proposed 2007 Amendments to the California Reformulated Gasoline Regulations detailed in the Air Resources Board (ARB) staff Initial Statement of Reasons (ISOR) report dated April 27, 2007.

Our comments concern the proposed revisions to the California Predictive Model for California Reformulated Gasoline formulation described in the ARB staff ISOR report. RFA wishes to complement the ARB staff for conducting an open, collaborative process for developing the proposed Predictive Model revisions that devoted considerable effort to considering the recommendations of all interested stakeholders.

Notwithstanding the staff's efforts, time pressure to complete the proposed revisions has resulted in an aggressive timetable, and confusion and inaccuracy in some aspects of the new model. This is important because of the complexity of the model, its impact on the regulated industries including the auto, oil and ethanol industries and the time required to fully understand its impacts. These difficulties have been compounded by a very recent change in the model date from 2010 to 2015.

Early in the public workshop process, RFA presented a Dual Model approach to more accurately represent the response of the vehicle fleet to fuel properties. However, the staff seemed to reject the concept due to a misunderstanding of the response of higher emitters to changes in fuel properties compared to low emitters, and a narrow focus on the effects of ethanol on NOx emissions.

RFA feels that the Dual Model proposal has not been given adequate consideration, and has prepared the attached report entitled "The Case for a Dual Tech 4 Model Within the California Predictive Model" that fully describes the Dual Model and why the authors believe that such a model would be more technically correct for all vehicles, and would simultaneously provide greater flexibility for the oil industry to meet the Predictive Model requirements.

Page 2

The RFA appreciates your consideration of this comprehensive report, and we look forward to working with you to assure the implementation of the most scientifically sound and workable model possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Dinneen", with a stylized flourish at the end.

Bob Dinneen
President & CEO

cc: Mr. Dean Simeroth, Chief, Criteria Pollutants Branch, Stationary Source Division