



June 19, 2015

Mary D. Nichols  
Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

RE: SUPPORT FOR LCFS READOPTION: 15-Day Proposed Modifications to LCFS

Dear Chair Nichols:

I am very pleased to submit these comments in support of the 15-Day Proposed Modifications on behalf of the California Biodiesel Alliance (CBA) and to reiterate the strongest support for the re-adoption of California's Low Carbon Fuel Standard (LCFS). As California's not-for-profit biodiesel industry trade association, CBA works very closely with and fully supports all of the comments of the national trade association, the National Biodiesel Board (NBB).

We begin by highlighting a key issue, detailed by the NBB, and also requesting that ARB include Tier 1 pathways for integrated oil and biodiesel producers or that the Tier 2 GREET model be available to those integrated biodiesel producers who qualify. To that point, we strongly urge a reinstatement of the "uncooked" used cooking oil (UCO) pathway under Tier 1. We believe it's very important for our California-based biodiesel producers who make biodiesel from used restaurant grease and don't use a cooking process, to benefit from a CI score that has been as much as 4 or more points lower than the pathway in which "cooking" is involved. This is coupled with the request that, toward the goal of accuracy in determining CI values, Tier 1 pathways account for integrated operations by allowing for the input of specific feedstock processing values, not just default values.

Also, while we understand the need for a period of review to determine accurate energy use for commercial-scale operations for provisional pathways, we are concerned about language suggesting a potential 2-year delay in the ability to monetize credits.

In closing, let me reiterate our appreciation for ARB's work, especially the skill and dedication that ARB staff has brought to the difficult tasks involved in LCFS re-adoption. We can attest to the willingness of staff at all levels to engage and satisfactorily address issues raised by our industry experts. We are very excited about the future of the California biodiesel industry and the growing contributions we can make to the state's carbon and petroleum reduction and related goals.

Thank you for considering these comments. Please call me with questions at 760-398-0815.

Sincerely,

A handwritten signature in blue ink that reads "Curtis Wright".

Curtis Wright  
Chairman