

From: Logan Caldwell [mailto:lc@hbioc.net]
Sent: Thursday, June 25, 2015 7:08 PM
To: Chowdhury, Hafizur@ARB
Subject: Assertion in 2nd Notice Summary that no data needed for many legacy pathways

In the summary of the changes in the 2nd 15-day Notice, regarding recertification of "legacy pathways" staff has written: "For many of these pathways ARB staff already has all of the information needed to conduct recertification without any submission of additional data by the applicant." (for convenient reference, I have copied below all of item #3 of the summary that contains this statement)

Does this mean that no data will be needed for chemical, enzyme and yeast use at fuel ethanol plants and that no transportation distances for feedstocks and ethanol will be needed? How will CARB calculate the CI using the Tier 1 calculator without this information? Has CARB decided to allow legacy pathways to use default values for these items?

Thank you for considering and commenting.

Copy of Item #3:

3. In section 95488, staff is proposing a streamlined recertification process by which "legacy pathways" certified under prior versions of the LCFS regulation could be recertified, pursuant to the proposed regulation, by ARB staff using the CA GREET 2.0 model. The goal of these changes is to minimize disruption of credit generation in the program due to the move from CA-GREET 1.8b to CA-GREET 2.0.

The program currently has over 270 Method 2 legacy pathways, including pathways posted as recently as May of 2015 . During the first 15-day comment

period stakeholders requested additional clarity on the fate of these existing pathways.

For many of these pathways ARB staff already has all of the information needed to conduct recertification without any submission of additional data by the applicant, and an abbreviated pathway re-certification process is appropriate.

Under the proposed changes, ARB staff could request additional information if required.

Regards,
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