



Via Online Submission

December 21, 2022

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: November 9, 2022 Low Carbon Fuel Standard Workshop**

Blue Star Gas is pleased to provide the following comments in response to the greenhouse gas emission goal alternatives presented in the above-referenced workshop.

Blue Star Gas is a privately owned propane company that has been in business since 1938. We provide propane for transportation use. Its California market area extends the Interstate 5 corridor beginning in Redding to the Oregon border and the Highway 101 corridor beginning in Santa Rosa and up to the Oregon border. We have 150 California employees and have served the transportation markets for decades.

Since our industry elected to opt in and become a LCFS fuel reporter six years ago, Blue Star Gas has been a leader in bringing renewable propane to the California market. As like other renewable fuels, Blue Star Gas understands the role renewable propane can play in diversifying California's energy policy to decrease carbon and other greenhouse gas emissions. However, supply and market adaptation take time, and CARB, in this newest rulemaking, should not rush to implement drastic greenhouse gas reduction goals that would signal to developing renewable energy suppliers and consumers, that renewable liquid fuels are obsolete. Given the reduction emission goal choices presented at the last workshop, Blue Star Gas urges CARB to adapt 25% GHG emission reduction in transportation by 2030.

Over the course of these six years, Blue Star Gas has spent hundreds of thousands of dollars in personnel and market outreach to private and public fleets to sell renewable propane. This investment also includes responding to fleet owners who desire to decrease their emissions without throwing away their existing propane infrastructure and engines and invest in electric. In some instances, the fleet owners are school districts who need a cost-effective way to decrease the emissions running their school bus fleet. More renewable propane production is needed in the supply stream not only for transportation uses but also for ambient heating and water. Suppliers depend on generating credits which are heavily calculated into the return on investment involved in the production of renewable propane.

Renewable propane, and other renewable liquid fuels, are needed solutions to achieve greenhouse gas emission reductions; California cannot rely just on electricity. The LCFS rulemaking should facilitate economic vibrancy for renewable propane and other renewable liquid fuels.

Blue Star Gas appreciates the opportunity to provide these comments.

Sincerely,

Alex Gallard  
Director of Legislative Affairs