

WANGER JONES HELSLEY PC
ATTORNEYS

OLIVER W. WANGER
TIMOTHY JONES*
MICHAEL S. HELSLEY
PATRICK D. TOOLE
SCOTT D. LAIRD
JOHN P. KINSEY
KURT F. VOTE
TROY T. EWELL
JAY A. CHRISTOFFERSON
MARISA L. BALCH
PETER M. JONES**
STEVEN M. CRASS**
AMANDA G. HEBESHA***
JENA M. HARLOS****
MICAELA L. NEAL
REBECCA S. MADDOX
NICOLAS R. CARDELLA
ERIN T. HUNTINGTON
STEVEN K. VOTE
JENNIFER F. DELAROSA
ROCCO E. DICICCO
GIULIO A. SANCHEZ
YLAN H. NGUYEN

265 E. RIVER PARK CIRCLE, SUITE 310
FRESNO, CALIFORNIA 93720

MAILING ADDRESS
POST OFFICE BOX 26340
FRESNO, CALIFORNIA 93729

TELEPHONE
(559) 233-4800
FAX
(559) 233-9330



OFFICE ADMINISTRATOR
LYNN M. HOFFMAN

Writer's E-Mail Address:
jkinsey@wjhattorneys.com

Website:
www.wjhattorneys.com

* Also admitted in Washington
** Of Counsel
*** Of Counsel/Also admitted in
Idaho
**** Also admitted in Wisconsin

September 27, 2018

VIA HAND DELIVERY

Clerk of the Board
CALIFORNIA AIR RESOURCES BOARD
1001 "I" Street, 23 Floor
Sacramento, CA 95821

Re: September 27, 2018 Hearing on Proposed Amendments to the California Low Carbon Fuel Standard Regulation and to the Regulation on Commercialization of Alternative Diesel Fuels

Dear Madam Clerk:

I am submitting the following comments on behalf of Growth Energy ("Growth Energy") in connection with the California Air Resources Board's ("CARB") September 27, 2018, hearing on the proposed amendments to the California Low-Carbon Fuel Standard Regulation and the Regulation on the Commercialization of Alternative Diesel Fuels (collectively, the "Proposed Amendments").

Growth Energy has reviewed staff's Responses to Comments on the Draft Environmental Analysis for the Proposed Amendments. Many of the responses reference prior rulemakings concerning the low carbon fuel standard ("LCFS") and the alternative diesel fuel ("ADF") regulations. To ensure the record is complete, I have enclosed a CD including the administrative record of the proceedings in the matter of *POET v. CARB*, Fresno County Superior Court, Case No. 15CECG03380 ("*POET IP*").

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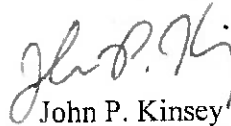
The Responses to Comments also state that CARB did not retain peer reviewers pursuant to Section 57004 of the Health & Safety Code for the Proposed Amendments, on the ground that the “fundamental scientific bases of the health protective standards and methodological *framework* underlying both regulations that *remained unchanged* by this amendment rulemaking [*sic*] were peer reviewed” in 2015. (Responses to Comments, No. B4-17 [emphasis added].) The adequacy of the peer review in 2015, however, remains at issue in *POET II*. In addition, this position appears inconsistent with prior assertions at the July 11, 2018 CARB Workshop, at which CARB staff stated aspects of the Proposed Amendments represent a “*departure from the framework* and philosophy of the program historically.” (June 11, 2018, Workshop [emphasis added].)

Growth Energy also understands CARB intends to mitigate emissions of NOx associated with the original LCFS regulation by providing \$9 million in grants to fund NOx reduction projects through the Voluntary NOx Remediation Measure (“VNRM”). The record, however, does not include evidence showing how the programs referenced would result in a ton-for-ton mitigation of past NOx emissions. Nor is there any evidence linking the amount of grant funds proposed with the amount of NOx emissions CARB intends to mitigate. (See *Calif. Clean Energy Comm. v. City of Woodland* (2014) 225 Cal.App.4th 173, 197.)

Further, many of the responses to environmental comments are inconsistent with the requirements of CARB’s certified regulatory program and related caselaw under CEQA. For example, the response to comment B4-69 states that CARB has declined to require more stringent mitigation requirements for NOx based on CARB’s “special expertise,” as opposed to record evidence. Likewise, CARB’s responses to comments on the issuance of credits for infrastructure and capacity are not directly responsive to the commenters’ concerns that the credits would be issued for activities that do not themselves reduce greenhouse gas emissions. (See Response to Comment No. FF9-1.)

Thank you for your consideration of the above comments. If you have any logistical questions concerning these submittals, please do not hesitate to contact me.

Respectfully submitted,


John P. Kinsey

Enclosure

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John P. Kinsey

Enclosure

Certification of Administrative Record

Case Name: ***POET, LLC; James M. Lyons,***

v.

California Air Resources Board, et al.

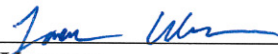
Fresno Superior Court Case No. 15 CE CG 03380

I, Jack Wursten, am the Legal Office Analyst at the California Air Resources Board. In that capacity, I am familiar with the documents that constitute pre-rulemaking workshop materials and with the documents that constitute the rulemaking files of proceedings involving the California Air Resources Board's adoption, in 2015, of the Low Carbon Fuel Standard regulation and the Alternative Diesel Fuels regulation.

In my capacity with the California Air Resources Board, I certify that, to the best of my knowledge, the attached record includes true and correct copies of the pre-rulemaking workshop materials the parties agreed to include, as well as true and correct copies of the official rulemaking files (other than duplicative documents and those documents the parties agreed to omit pursuant to paragraph 1 of the attached stipulation), from proceedings before the California Air Resources Board involving the adoption, in 2015, of the Low Carbon Fuel Standard regulation and the Alternative Diesel Fuels regulation.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. If called upon as a witness, I could and would competently testify thereto.

Executed at Sacramento, California, on June 24, 2016.



Jack Wursten
Legal Office Analyst
California Air Resources Board

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3	04/23/2013	ADF Rulemaking Public Workshop Presentation	ADF0000038
4	04/23/2013	ADF Rulemaking Public Workshop Presentation	ADF0000093
5	04/23/2013	UST Leak Prevention Program	ADF0000121
6	04/23/2013	April Workshop Participant List	ADF0000132
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1	10/15/2007	Assembly Bill 118; Núñez, Chapter 750, Statutes of 2007	ADF0001697

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3	2007	<i>Energy Independence and Security Act of 2007</i> , section 202 (a)(2)(B)(i)(I)	ADF0001765
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8	Aug-2013	U.S. Environmental Protection Agency, Office of Transportation and Air Quality. <i>EPA Finalizes 2013 Renewable Fuel Standards</i> , EPA-420-F-13-042.	ADF0002396
9	Apr-2014	U.S. Environmental Protection Agency, Office of Transportation and Air Quality. <i>EPA Issues Direct Final Rule for 2013 Cellulosic Standard</i> , EPA-420-F-14-018	ADF0002399
10	11/29/2013	U.S. Environmental Protection Agency. <i>2014 Standards for the Renewable Fuel Standard Program; Proposed Rule</i> . Federal Register. Volume 78, No. 230. Part II. 40 CFR 80.	ADF0002402
11	2002	U.S. Environmental Protection Agency, <i>A Comprehensive Analysis of Biodiesel Impacts on Exhaust Emissions</i>	ADF0002456
12	Oct-2011	Durbin, Thomas et al., <i>Biodiesel Characterization and NOx Mitigation Study</i>	ADF0002582
13	Apr-2013	Durbin, Thomas et al., <i>CARB B5 Biodiesel Preliminary and Certification Testing</i>	ADF0002927
14	Jun-2014	Karavalakis, Georgios et al., <i>CARB Comprehensive B5/B10 Biodiesel Blends Heavy-Duty Engine Dynamometer Testing</i> ,	ADF0002973
15	1996	Neter, John et al., <i>Applied Linear Statistical Models</i> , Fourth Edition Irwin. ⁱ	ADF0003040
16	1998	Draper, Norman and Smith, Harry, <i>Applied Regression Analysis</i> , Third Edition Wiley Interscience.	ADF0003042
17	2013	R Core Team, <i>R: A language and environment for statistical computing</i> . R Foundation for Statistical Computing, Vienna, Austria. ISBN 3-900051-07-0, 2013, http://www.R-project.org/	ADF0003057

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19	2010	Bunce, Michael et al, <i>Stock and Optimized Performance and Emissions with 5% and 20% Soy Biodiesel Blends in a Modern Common Rail Turbo-Diesel Engine</i> , Energy Fuels, 2010, 24 (2), pp 928–939	ADF0003155
20	2012	Lammert, Michael et al., <i>Effect of B20 and Low Aromatic Diesel on Transit Bus NOx Emissions Over Driving Cycles with a Range of Kinetic Intensity</i> , SAE Int. J Fuels Lubr., 5(3):2012	ADF0003167
21	04/01/2014	Gysel, Nicholas et al., <i>Emissions and Redox Activity of Biodiesel Blends Obtained from Different Feedstocks from a Heavy-Duty Vehicle Equipped with DPF/SCR Aftertreatment and a Heavy-Duty Vehicle without Control Aftertreatment</i> , SAE 2014-01-1400	ADF0003182
22	10/25/2010	McWilliam, Lyn and Zimmermann, Anton, <i>Emission and Performance Implications of Biodiesel Use in an SCR-equipped Caterpillar C6.6</i> , 2010-012157	ADF0003196
23	10/25/2010	Mizushima, Norifumi and Nurata, Yutaka, <i>Effect of Biodiesel on NOx Reduction Performance of Urea-SCR system</i> , SAE 2010-01-2278	ADF0003206
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27	2001	California Air Resources Board, Report, <i>Policies and Actions for Environmental Justice</i>	ADF0003254
28	10/22/2014	California Air Resources Board, <i>History of Air Resources Board</i> , Website, http://www.arb.ca.gov/knowzone/history.htm , Oct 22, 2014 (accessed December 10, 2014)	ADF0003267
29	Undated	California Air Resources Board, Video file, <i>Clearing California Skies Updated</i> , http://www.arb.ca.gov/videos/clskies.htm (accessed December 10, 2014) (Narrative Version)	ADF0003273

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30	Jun-2008	U.C. Berkeley, U.C. Davis, Lawrence Livermore National Laboratory, <i>Guidance Document and Recommendations on the Types of Scientific Information Submitted by Applicants for California Fuels Environmental Multimedia Evaluations</i>	ADF0003277
31	Nov-2013	Multimedia Working Group, California Environmental Protection Agency. <i>Staff Report: Multimedia Evaluation of Biodiesel</i>	ADF0003345
32	Nov-2013	Multimedia Working Group, California Environmental Protection Agency. <i>Staff Report: Multimedia Evaluation of Renewable Diesel</i>	ADF0003727
33	May-2013	U.C. Berkeley, U.C. Davis, <i>California Biodiesel Multimedia Evaluation Final Tier III Report</i>	ADF0003962
34	Apr-2012	U.C. Berkeley, U.C. Davis, <i>California Renewable Diesel Multimedia Evaluation Final Tier III Report</i>	ADF0004197
35	Undated	Air Resources Board. <i>Fuels Multimedia Evaluation Meetings and Documents</i> http://www.arb.ca.gov/fuels/multimedia/meetings/meetings.htm .	ADF0004284
36	Undated	Standardized Regulatory Impact Assessments (SRIA): http://www.dof.ca.gov/research/economic_research_unit/SB617_regulation/2014Major_Regulations/	ADF0004288
37	Undated	Biodiesel Magazine, USA Plants http://www.biodieselmagazine.com/plants/listplants/USA/page:1/sort:state/direction:asc (accessed November 4, 2014)	ADF0004290
38	Undated	National Biodiesel Board, Biodiesel Plants Listing, http://www.biodiesel.org/production/plants/plants-listing (accessed November 4, 2014)	ADF0004294
39	Undated	National Biodiesel Board, Biodiesel Distributor Listings, http://www.biodiesel.org/using-biodiesel/finding-biodiesel/locate-distributors-in-the-us/biodiesel-distributor-listings (accessed November 4, 2014)	ADF0004296
40	04/2013	Department of Transportation, <i>Caltrans Activities to Address Climate Change Reducing Greenhouse Gas Emissions and Adapting to Impacts</i>	ADF0004298
References for Appendix D (EA) to the Staff Report: Initial Statement of Reasons			
1	08/2011	Bertzky, Monika, Valerie Kapos, and Jorn P. W. Scharlemann. 2011 (August). Indirect Land Use Change from biofuel production : implications for biodiversity. Available: http://www.cbd.int/agriculture/2011-121/UNEP-WCMC-JNCC%20report-sep11-en.pdf . Accessed: December 2014.	ADF0004412

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2	2010	Crago, Christine L., Madhu Khanna, Jason Barton, Eduardo Giuliani, Weber Amaral. 2010. Competitiveness of Brazilian Sugarcane Ethanol Compared to US Corn Ethanol. Available: http://ageconsearch.umn.edu/bitstream/60895/2/Crago_CostofCornandSugarcaneEthanol_AAEA.pdf	ADF0004443
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7	2014	International Council on Clean Transportation. 2014. A Guide for the Perplexed to the Indirect Effects of Biofuels Productions.	ADF0004740
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16	2010	US EPA. 2010. How Do the Class VI Requirements Protect Against a Sudden Release of CO2. Available: http://water.epa.gov/type/groundwater/uic/class6/upload/uichowdotheClassVIrequirementsprotectagainstasuddenreleaseofCO2dec2010.pdf . Accessed: December 2014.	ADF0005078
17	2013	Vidal, Oliver, Brun Goffe, and Nicholas Arndt. 2013. Metals for a low-carbon society. Nature-Geoscience, Volume 6, 894-896.	ADF0005079
References for Appendix D Attachment 1 to the Staff Report: Initial Statement of Reasons			
1	2003	Ahrens, C. Donald. 2003. Meteorology Today: An Introduction to Weather, Climate and the Environment. Seventh Edition. Published by Thomson Brooks/Cole, pgs. 536,537, 498, 508-509.	ADF0005082
2	Undated	ARB. California Air Resources Board. Statewide 2012 Emissions Inventory Criteria Pollutants and Precursors.	ADF0005089
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Public Comments Received During The 45 Day Comment Period			
1	12/10/2013	Roger Gault, Truck and Engine Manufacturers Ass.	ADF0008639

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2	12/11/2013	Norman Johnson	ADF0008645
3	12/11/2013	Gina Grey, WSPA	ADF0008651
4	12/12/2013	Brittany Syz	ADF0008658
5	12/12/2013	Brian Guarraci, POET	ADF0008662
6	12/12/2013	Tom Buis, Growth Energy	ADF0008665
7	02/13/2015	Harry Simpson, Crimson Renewable Energy LP	ADF0008790
8	02/15/2015	Shelby Neal, National Biodiesel	ADF0008794
9	02/17/2015	Valerie Ughetta, alliance of Automobile Manufacturers	ADF0008797
10	02/17/2015	Roger Gault	ADF0008803
11	02/17/2015	Curtis Wright, Imperial Western Products	ADF0008809
12	02/17/2015	Celia DuBose, California Biodiesel Alliance	ADF0008812
13	02/17/2015	Cathy Reheis-Boyd	ADF0008815
14	02/17/2015	Jennifer Case	ADF0008839
15	02/17/2015	Rebecca Boudreaux, Oberon Fuels	ADF0008842
16	02/17/2015	Joshua Willter, Sierra Research POET	ADF0008845
17	02/17/2015	Joshua Willter, Sierra Research Growth Energy	ADF0008847
18	02/17/2015	Joshua Willter, Sierra Research Growth Energy	ADF0009152
19	02/17/2015	Joshua Willter, Sierra Research Growth Energy	ADF0011372
20	02/17/2015	Joshua Willter, Sierra Research Growth Energy	ADF0012032
21	02/17/2015	Joshua Willter, Sierra Research Growth Energy	ADF0013183
22	02/17/2015	Joshua Willter, Sierra Research Growth Energy	ADF0014773
23	02/17/2015	Will Barrett, American Lung Association in California	ADF0018425
24	02/17/2015	Dayne Delahoussaye	ADF0018428
Public Hearing of the Air Resources Board February 19, 2015			
1	02/19/2015	Transcript of the February 19, 2015 Hearing	ADF0018431
2	02/19/2015	Copies of Slide Presentation from the February 19, 2015 Board Hearing	ADF0018696
3	03/03/2015	Resolution 15-5	ADF0018730
Written Comments Received During the February 19, 2015 Hearing			
1	02/24/2015	Graham Noyes, Keyes, Fox & Wiedman, LLP	ADF0018734
2	02/24/2015	Joe Gershen, Biodiesel Industry Veteran	ADF0018739
3	03/04/2015	Joshua Willter, Sierra Research	ADF0018741
15-Day Notice of Public Availability of Modified Text			
1	05/22/2015	Notice of Public Availability of Modified text	ADF0019303
2	05/22/2015	Attachment A-Modified Regulatory Text	ADF0019318
Documents Identified in 15-Day Notice			
1	05/2015	California Environmental Protection Agency. Multimedia Working Group. <i>Staff Report: Multimedia Evaluation of Biodiesel</i> . May 2015. http://www.arb.ca.gov/fuels/diesel/altdiesel/20150521BD_StaffReport.pdf	ADF0019366
2	05/2015	California Environmental Protection Agency. Multimedia Working Group. <i>Staff Report:</i>	ADF0020012

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		<i>Multimedia Evaluation of Renewable Diesel.</i> May 2015. http://www.arb.ca.gov/fuels/diesel/altdiesel/20150521RD_StaffReport.pdf	
3	2014	ASTM D7170-14 (2014), "Standard Test Method for Determination of Derived Cetane Number (DCN) of Diesel Fuel Oils—Fixed Range Injection Period, Constant Volume Combustion Chamber Method."	ADF0020314
4	2014	ASTM D7668-14a (2014), "Standard Test Method for Determination of Derived Cetane Number (DCN) of Diesel Fuel Oils—Ignition Delay and Combustion Delay Using a Constant Volume Combustion Chamber Method." Staff is proposing to add this ASTM to the regulation by incorporation by reference.	ADF0020328
Public Comments Received During The 15 Day Comment Period			
1	06/06/2015	Cathy Reheis-Boyd	ADF0020342
2	06/08/2015	Shelby Neal, National Biodiesel Board	ADF0020353
3	06/08/2015	Celia DuBose, California Biodiesel Alliance	ADF0020356
4	06/08/2015	Roger Gault, Truck and Engine Manufacturers Association	ADF0020358
5	06/08/2015	Joshua Willter, Sierra Research	ADF0020362
Environmental Policy Council Resolution on Biodiesel and Renewable Diesel			
1	6/23/2015	Environmental Policy Council Resolution on Biodiesel and Renewable Diesel (Draft)	ADF0020389
Public Hearing of the Air Resources Board September 24-25, 2015			
1	09/21/2015	The ADF regulation proposed text, incorporating all 15-day changes	ADF0020397
2	09/21/2015	Final Environmental Analysis	ADF0020483
3	09/21/2015	Final Statement of Reasons	ADF0020807
4	09/21/2015	Response to Comments on the EA	ADF0022212
5	09/24/2015	Responses to Comments on the Alternative Diesel Fuel Regulation	ADF0023199
6	09/24/2015	Copies of Slide Presentation from the September 24, 2015 Hearing	ADF0024470
7	09/25/2015	Transcript of the September 24, 25, 2015 Hearing	ADF0024480 ADF0024684
8	09/25/2015	Supplemental Responses to Comments on the Alternative Diesel Fuel Regulation	ADF0024779
9	09/25/2015	Supplemental to the Responses to Comments on the Environmental Analysis	ADF0024785
10	10/02/2015	Notice of Decision	ADF0024795
11	10/05/2015	Attachment D-Findings and Statement of Overriding Considerations	ADF0024797
12	10/05/2015	Resolution 15-51	ADF0024811
13	10/05/2015	Resolution 15-41	ADF0024815

Written Comments Received During the September 24-25, 2015 Hearing			
1	09/28/2015	John Kinsey, Growth Energy	ADF0024821
Final Rulemaking Package			
1	11/16/2015	Endorsed form 400	ADF0025042
2	11/16/2015	Final Regulation Order	ADF0025043
3	11/16/2015	Addendum to FSOR	ADF0025083
4	11/16/2015	Updated Informative Digest	ADF0025104
LOW CARBON FUEL STANDARD REGULATION 2015			
REGULATORY DEVELOPMENT*			
3/05/2013 Meeting			
1	03/05/2013	Meeting Notice	LCFS0000001
2	03/05/2013	Handout	LCFS0000004
3	03/05/2013	Meeting Presentation	LCFS0000026
4/03/2013 Meeting			
1	04/03/2013	Meeting Notice	LCFS0000092
2	04/03/2013	Handout	LCFS0000095
3	04/03/2013	Meeting Presentation	LCFS0000104
5/24/2013 Meeting			
1	05/13/2013	LCFS Rulemaking Workshop Agenda	LCFS0000130
2	05/24/2013	Handout-Revised	LCFS0000133
3	05/24/2013	Presentation-Revised	LCFS0000150
4	05/22/2013	CCP Concept Paper	LCFS0000199
6/20/2013 Meeting			
1	06/20/2013	Meeting Notice	LCFS0000204
2	06/20/2013	Refinery-Specific Incremental Deficit Handout	LCFS0000207
3	06/20/2013	Refinery-Specific Incremental Deficit Presentation	LCFS0000213
4	06/20/2013	Low-Complexity/Low-Energy-Use Refinery Provisions Handout	LCFS0000231
5	06/20/2013	Low-Complexity/Low-Energy-Use Refinery Provisions Presentation	LCFS0000235
3/11/2014 Meeting			
1	03/11/2014	Meeting Notice	LCFS0000246
2	03/11/2014	Handout	LCFS0000249
3	03/11/2014	Presentation	LCFS0000288
4	03/11/2014	Concept Paper	LCFS0000365
5	03/11/2014	AEZEF-Report	LCFS0000398
6	03/11/2014	AEZEF Model Explanation	LCFS0000443
7	03/11/2014	ILUC Presentation Handouts	LCFS0000445
8	03/11/2014	ILUC Presentation Handouts	LCFS0000529
9	03/11/2014	ILUC Output Instructions	LCFS0000571
10	03/11/2014	OPGGEE Documentation	LCFS0000573
Public Input for 3/11/2014 Meeting			
1	04/10/2014	American Coalition for Ethanol	LCFS0000756
2	04/11/2014	Bioenergy Association of California	LCFS0000760

3	04/10/2014	Biotechnology Industry Organization	LCFS0000763
4	04/11/2014	Brazilian Sugarcane Industry Association (UNICA)	LCFS0000769
5	04/01/2014	Calgren Renewable Fuels	LCFS0000786
6	04/11/2014	California Association of Sanitation Engineers	LCFS0000789
7	04/11/2014	California Biodiesel Alliance	LCFS0000792
8	04/11/2014	California Ethanol + Power, LLC	LCFS0000794
9	04/09/2014	California Independent Petroleum Association	LCFS0000795
10	04/11/2014	Canola Council of Canada	LCFS0000797
11	05/19/2014	Clean Air Task Force	LCFS0000804
12	04/10/2014	Clean Energy	LCFS0000814
13	05/21/2014	Element Markets	LCFS0000817
14	04/04/2014	Electric Vehicles International	LCFS0000823
15	04/11/2014	Environmental entrepreneurs	LCFS0000824
16	06/07/2013	Flyers Energy	LCFS0000826
17	04/09/2014	GHI Energy	LCFS0000827
18	04/11/2014	Glasspoint	LCFS0000829
19	04/11/2014	Growth Energy	LCFS0000831
20	04/11/2014	Imperium Renewables, Inc.	LCFS0000850
21	04/11/2014	International Council on Clean Transportation	LCFS0000852
22	03/28/2014	Iowa Corn	LCFS0000858
23	04/18/2014	James Rhodes	LCFS0000885
24	4/11/2014	Kern Oil & Refining Co.	LCFS0000892
25	04/11/2014	Life Cycle Associates	LCFS0000895
26	04/11/2014	Macpherson Energy Corporation	LCFS0000907
27	04/11/2014	National Biodiesel Board	LCFS0000909
28	03/28/2014	National Corn Growers Association	LCFS0000935
29	04/10/2014	NexSteppe	LCFS0000942
30	04/11/2014	NGO Community	LCFS00009545
31	04/14/2014	PRO Petroleum Incorporated	LCFS0000953
32	03/20/2014	Proterra	LCFS0000957
33	04/09/2014	Renewable Fuels Association	LCFS0000959
34	06/14/2013	Shell Oil Products US	LCFS0000995
35	03/31/2014	Western Canada Biodiesel Association	LCFS0000998
36	04/11/2014	Western States Petroleum Association	LCFS0001001
37	03/10/2014	Aslton & Bird LLP	LCFS0001017
4/04/2014 Meeting			
1	04/04/2014	Meeting Notice	LCFS0001026
2	04/04/2014	Fuel Pathways and Producer Facility Registration Handout	LCFS0001029
3	04/04/2014	Fuel Pathways and Producer Facility Registration Presentation	LCFS0001054
4	04/04/2014	Cost Containment Handout	LCFS0001079
5	04/04/2014	Cost Containment Presentation	LCFS0001101
Public Input for 4/04/14 Meeting			
1	06/25/2014	Genscape	LCFS0001123

2	04/25/2014	Las Gallinas Valley Sanitary District	LCFS0001130
3	05/02/2014	Neste Oil	LCFS0001133
4	05/09/2014	Western States Petroleum Association	LCFS0001137
04/18/2014 Meeting			
1	04/18/2014	Meeting Notice	LCFS0001140
2	04/18/2014	Refinery Handout	LCFS0001143
3	04/18/2014	Refinery Presentation	LCFS0001153
4	04/18/2014	Crude Handout	LCFS0001173
5	04/18/2014	Crude Presentation	LCFS0001181
6	04/18/2014	DRAFT Language on Innovative Crude Production	LCFS0001196
7	04/18/2014	DRAFT Innovative Method Emissions Reduction Estimator	LCFS0001206
8	04/18/2014	Reporting and Enforcement Presentation	LCFS0001223
9	04/18/2014	Reporting and Enforcement Handout	LCFS0001249
Public Input for 4/18/2014 Meeting			
1	05/15/2014	Alon USA	LCFS0001262
2	05/09/2014	BrightSource Energy	LCFS0001266
3	05/02/201	GlassPoint	LCFS0001271
4	05/28/2014	Natural Resources Defense Council	LCFS0001274
5	05/19/2014	James Rhodes	LCFS0001279
6	06/13/2014	Western States Petroleum	LCFS0001286
7	07/10/2014	United Steelworkers, Natural Resources Defense Council	LCFS0001289
5/30/2014 Meeting			
1	05/30/2014	Meeting Notice	LCFS0001291
2	05/30/2014	Handout	LCFS0001295
3	05/30/2014	Handout 2-Fuel Pathways and Physical Transport Mode Demonstration	LCFS0001321
4	05/30/2014	Handout 3-Electricity and Hydrogen	LCFS0001354
5	05/30/2014	Handout 4-Credit Transactions	LCFS0001365
6	05/30/2014	Handout 5-Reporting and Record Keeping	LCFS0001373
7	05/30/2014	Handout 6-Enforcment Provisions	LCFS0001387
8	05/30/2014	Presentation	LCFS0001391
9	05/30/2014	Draft LCFS	LCFS0001442
10	05/30/2014	Proposed LCFS	LCFS0001444
Public Input for 5/30/2014 Meeting			
1	06/13/2014	American Lung Association in California	LCFS0001447
2	06/16/2014	California Electric Transportation Coalition	LCFS0001449
3	06/11/2014	Element Markets	LCFS0001450
4	06/13/2014	Los Angeles Department of Water & Power	LCFS0001453
5	06/13/2014	Western States Petroleum Association	LCFS0001456
6	06/23/2014	Neste Oil	LCFS0001465
7	06/23/2014	Ensyn Corporation	LCFS0001468
8	06/30/2014	Life Cycle Associates	LCFS0001471
7/10/2014 Meeting			
1	07/10/2014	Meeting Notice	LCFS0001474

2	07/10/2014	Handout	LCFS0001477
3	07/10/2014	Presentation	LCFS0001499
4	07/10/2014	Refinery and Crude Oil Provisions Handout	LCFS0001543
5	07/10/2014	Regulated Party Provisions Handout	LCFS0001583
6	07/10/2014	OPGEEv1.1 Draft C	LCFS0001601
7	07/10/2014	Model Documentation for OPGEEv1.1 Draft C	LCFS0001859
8	07/10/2014	Draft MCON Inputs for Crude Lookup Table	LCFS0002048
9	07/10/2014	Draft MCON Inputs for 2010 Baseline	LCFS0003357
10	07/10/2014	Draft Calculation for 2010 Baseline	LCFS0003914
Public Input for 7/10/2014 Meeting			
1	07/25/2014	Alon USA and Paramount Petroleum	LCFS0003920
2	07/24/2014	MacPherson Energy Corporation	LCFS0003925
3	07/25/2014	Western States Petroleum Association	LCFS0003927
4	07/25/2014	The Coalition for Renewable Natural Gas	LCFS0003931
5	07/25/2014	GlassPoint Solar, Inc.	LCFS0003995
6	07/25/2014	Alston & Bird LLP	LCFS0003936
7	07/30/2014	Union of concerned Scientists and National Resources Defense Council	LCFS0003951
8	09/09/2014	California Independent Oil Marketers Association (CIOMA)	LCFS0003954
8/22/2014 Meeting			
1	08/22/2014	Meeting Notice	LCFS0003956
2	08/22/2014	Handout	LCFS0003959
3	08/22/2014	Presentation	LCFS0003968
Public Input for 8/22/2014 Meeting			
1	09/15/2014	National Biodiesel Board	LCFS0003986
2	09/15/2014	Coalition for Renewable Natural Gas	LCFS0003991
3	09/15/2014	Renewable Fuels Association	LCFS0004000
4	09/15/2014	Brazilian Sugarcane Industry Association (UNICA)	LCFS0004007
5	09/15/2014	Western States Petroleum Association	LCFS0004011
6	09/15/2014	BP America	LCFS0004015
7	09/15/2014	National Corn Growers Association	LCFS0004018
8	09/15/2014	Canola Council of Canada	LCFS0004019
9	09/15/2014	California Biodiesel Alliance	LCFS0004024
10	09/15/2014	Life Cycle Associates	LCFS0004026
11	09/22/2014	Clean Energy	LCFS0004032
12	09/23/2014	Southern California Gas Company7	LCFS0004045
13	09/22/2014	VNG.co	LCFS0004049
14	09/22/2014	California Natural Gas Vehicle Coalition	LCFS0004051
15	09/22/2014	Natural Gas Vehicle for America	LCFS0004054
16	09/22/2014	America's Natural Gas Alliance	LCFS0004056
17	09/22/2014	Pacific Gas and Electric Company	LCFS0004061
18	09/22/2014	Ryder System, Inc	LCFS0004064
19	09/22/2014	Life Cycle Associates	LCFS0004065
20	09/22/2014	Westport	LCFS0004076

9/25/2014 Meeting			
1	09/25/2014	Meeting Notice	LCFS0004078
2	09/25/2014	Presentation	LCFS0004081
3	09/25/2014	Handout	LCFS0004127
Public Input for 9/25/2014 Meeting			
1	10/03/2014	California Ethanol + Power, LLC	LCFS0004173
2	10/07/2014	Renewable Fuels Association	LCFS0004174
3	10/03/2014	Canergy	LCFS0004178
4	10/13/2014	MircorBio Engineering, Inc.	LCFS0004180
5	10/16/2014	Biodico Sustainable Biorefineries	LCFS0004181
6	10/09/2014	AdTra, Inc.	LCFS0004185
7	10/13/2014	Stephen Kaffka, UC Davis	LCFS0004217
8	10/16/2014	Imperial Western Products, Inc.	LCFS0004220
9	10/16/2014	Crimson Renewable Energy, LP	LCFS0004221
10	10/16/2014	New Leaf Biofuel	LCFS0004223
11	10/16/2014	Propel Fuels	LCFS0004225
12	10/16/2014	Baker Commodities, Inc.	LCFS0004226
13	10/16/2014	California Biodiesel Alliance	LCFS0004228
14	10/16/2014	Coalition for Renewable Natural Gas	LCFS0004231
15	10/16/2014	Pacific Ethanol	LCFS0004236
16	10/19/2014	Western State Petroleum Association	LCFS0004237
9/29/2014 Meeting			
1	09/29/2014	Meeting Notice	LCFS0004241
2	09/29/2014	Refinery Investment Provisions Handout	LCFS0004244
3	09/29/2014	Refinery Investment Provisions Presentation	LCFS0004250
4	09/29/2014	Draft Refinery Investment Provisions	LCFS0004267
5	09/29/2014	Indirect Land Use Change Handout	LCFS0004276
6	09/29/2014	Indirect Land Use Change Presentation	LCFS0004331
Public Input for 9/29/2014 Meeting			
1	10/13/2014	Agilyx LLC	LCFS0004386
2	10/14/2014	National Sorghum Producers	LCFS0004390
3	10/14/2014	Western States Petroleum Association (ILUC)	LCFS0004392
4	10/14/2014	Growth Energy/Renewable Fuels Association	LCFS0004393
5	10/15/2014	Canola Council of Canada	LCFS0004397
6	10/15/2014	National Biodiesel Board	LCFS0004398
7	10/15/2014	NexSteppe Inc.	LCFS0004404
8	10/15/2014	Brazilian Sugarcane Industry Association (UNICA)	LCFS0004406
9	10/15/2014	Renewable Fuels Association	LCFS0004411
10	10/17/2014	Air Improvement Resources, Inc.	LCFS0004450
11	10/15/2014	Carnergy, LLC	LCFS0004471
12	11/10/2014	Ethanol Risk and Insurance Solutions	LCFS0004475
13	11/12/2014	James Rhodes	LCFS0004481
10/27/2014 Public Meeting			
1	10/27/2014	Meeting Notice	LCFS0004486
2	10/27/2014	Handout	LCFS0004489

3	10/27/2014	Presentation	LCFS0004512
Public Input for 10/27/2014 Meeting			
1	11/07/2014	E2	LCFS0004557
2	11/11/2014	Neste Oil	LCFS0004559
3	11/11/2014	GHI Energy Biofuels & Renewables	LCFS0004562
4	11/11/2014	Syngenta	LCFS0004575
5	11/12/2014	Element Markets	LCFS0004581
6	11/12/2014	Crimson Renewable Energy, LP	LCFS0004585
7	11/17/2014	Low Carbon Fuels Coalition	LCFS0004588
8	11/17/2014	American Lung Association in California	LCFS0004592
9	11/17/2014	Biotechnology Industry Organization	LCFS0004593
10	11/17/2014	Coalition for Renewable Natural Gas	LCFS0004595
11	11/17/2014	California Biodiesel Alliance	LCFS0004599
12	11/17/2014	Waste Management	LCFS0004601
13	11/17/2014	Oberon Fuels	LCFS0004606
14	11/17/2014	Western States Petroleum Association	LCFS0004608
15	11/17/2014	California Electric Transportation Coalition	LCFS0004616
11/13/2014 Meeting			
1	11/13/2014	Meeting Notice	LCFS0004618
2	11/13/2014	Handout	LCFS0004621
3	11/13/2014	Presentation	LCFS0004647
4	11/13/2014	Draft Crude Oil Provisions Handout	LCFS0004698
5	11/13/2014	Draft Reporting and Recordkeeping Provisions Handout	LCFS0004737
6	11/13/2014	OPGEEv1.1 Draft D	LCFS0004744
7	11/13/2014	Model Documentation for OPGEEv1.1 Draft D	LCFS0005073
8	11/13/2014	Draft MCON Inputs for Crude Lookup Table	LCFS0005258
9	11/13/2014	Draft MCON Inputs Spreadsheet for 2010 Baseline	LCFS0007138
10	11/13/2014	Calculation of Proposed Energy Economy Ratio (EER) for Electric Buses	LCFS0008141
Public Input for 11/13/2014 Meeting			
1	11/21/2014	Western States Petroleum Association	LCFS0008142
2	11/21/2014	California Electric Transportation Coalition	LCFS0008145
3	11/21/2014	Alon USA Energy	LCFS0008147
4	11/21/2014	GlassPoint	LCFS0008151
5	11/23/2014	Life Cycle Associates	LCFS0008153
6	11/25/2014	Neste Oil	LCFS0008155
11/20/2014 Public Meeting			
1	11/20/2014	Meeting Notice	LCFS0008158
2	11/20/2014	Handout	LCFS0008161
3	11/20/2014	Presentation	LCFS0008177
Public Input for 11/20/2014 Meeting			
1	12/02/2014	Union of Concerned Scientists	LCFS0008209
2	12/04/2014	Air Improvement Resource, Inc.	LCFS0008213
3	12/05/2014	Renewable Fuels Association	LCFS0008248
4	12/05/2014	National Biodiesel Board	LCFS0008306

5	12/05/2014	Brazilian Sugarcane Industry Association (UNICA)	LCFS0008312
6	12/10/2014	BP America, Inc.	LCFS0008316
RULEMAKING MATERIALS			
Public Hearing Notice and Related Materials			
1	9/30/2014	Economic and Fiscal Impact Statement Form 399	LCFS0008319
2	11/17/2014	SRIA DF-131 and DOF's comments on SRIA	LCFS0008335
3	12/30/2014	Notice of Public Hearing	LCFS0008338
4	12/30/2014	Staff Report: Initial Statement of Reasons	LCFS0008370
5	12/30/2014	Appendix A: Proposed Regulation Order	LCFS0008665
6	12/30/2014	Appendix B: Development of Illustrative Compliance Scenarios and Evaluation of Potential Compliance Curves	LCFS0008914
7	12/30/2014	Appendix C: Comparison of CA-GREET 1.8B, GREET1 2013, and CA-GREET 2.0	LCFS0008956
8	12/30/2014	Appendix D: Draft Environmental Analysis	LCFS0009034
9	12/30/2014	Appendix E: Summary of DOF Comments to the Combined LCFS/ADF SRIA and ARB Responses, Includes Combined LCFS/ADF SRIA	LCFS0009313
10	12/30/2014	Appendix F: Inputs and Outputs of the REMI Modeling	LCFS0009356
11	12/30/2014	Appendix G: Default Credit Calculation for Innovative Crude Production Methods	LCFS0009369
12	12/30/2014	Appendix H: Estimating Carbon Intensity Values for the Crude Lookup Table	LCFS0009375
13	12/30/2014	Appendix I: Detailed Analysis for Indirect Land Use Change	LCFS0009399
14	12/30/2014	Certification of Availability of References and References	LCFS0009512
15	03/17/2009	E-mail from Richard Plevin	LCFS0009513
16	04/09/2009	E-mail from Thomas W. Hertel	LCFS0009514
17	04/16/2009	E-mails from Thomas W. Hertel	LCFS0009515
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Public Comments Received During the 45 Day Comment Period			
1	01/22/2015	Tim Carmichael, California Natural Gas Vehicle Coalition	LCFS0051857
2	02/03/2015	Marc Rauch, The Auto Channel	LCFS0051864

3	02/04/2015	George Sterzinger,	LCFS0051867
4	02/10/2015	Mike Mielke, Silicon Valley Leadership Group	LCFS0051874
5	02/12/2015	Jeremy Martin	LCFS0051877
6	02/13/2015	Eileen Tutt, California Electric Transportation Coalition	LCFS0051944
7	02/13/2015	Harry Simpson, Crimson Renewable Energy LP	LCFS0051947
8	02/16/2015	Geoff Cooper, RFA	LCFS0051951
9	02/16/2015	John Duff, National Sorghum Producers	LCFS0052014
10	02/16/2015	Lyle Schlyer, Calgren Renewable Fuels	LCFS0052016
11	02/16/2015	Mary Solecki, Environmental Entrepreneurs	LCFS0052018
12	02/17/2015	Derek Peine, Western Plains Energy LLC	LCFS0052022
13	02/17/2015	Matt Durler, Conestoga Energy Partners	LCFS0052024
14	02/17/2015	Jamieat Hall	LCFS0052026
15	02/17/2015	Jamie Knapp, J Knapp Communications	LCFS0052029
16	02/17/2015	Eric McCarthy, Proterra	LCFS0052035
17	02/17/2015	Shelby Neal, National Biodiesel Board	LCFS0052038
18	02/17/2015	Bernardo Silva, Brazilian Industrial Biotechnology Association	LCFS0052041
19	02/17/2015	Eileen Tutt	LCFS0052049
20	02/17/2015	Timothy V. Johnson, Sc.D., Corning Incorporated	LCFS0052218
21	02/17/2015	Jeremy Martin, Union of Concerned Scientists	LCFS0052229
22	02/17/2015	Simon Mui	LCFS0052235
23	02/17/2015	Simon Mui	LCFS0052267
24	02/17/2015	Brent Erickson, BIO	LCFS0052269
25	02/17/2015	Alexander Menotti, Airlines for America	LCFS0052273
26	02/17/2015	Andy Foster, Aemetis, Inc.	LCFS0052277
27	02/17/2015	Carol Tjong	LCFS0052279
28	02/17/2015	John O'Donnell, GlassPoint Solar	LCFS0052281
29	02/17/2015	Jonathan Lewis, Clean Air Task Force	LCFS0052310
30	02/17/2015	Lyle Schlyer, Calgren Renewable Fuels	LCFS0052320
31	02/17/2015	Curtis Wright, Imperial Western Products	LCFS0052325
32	02/17/2015	Ralph Moran	LCFS0052328
33	02/17/2015	Rock Zierman, CIPA	LCFS0052344
34	02/17/2015	Celia DuBose, California Biodiesel Alliance	LCFS0052370
35	02/17/2015	Kelly Stone, ActionAid USA	LCFS0052373
36	02/17/2015	Jennifer Case	LCFS0052430
37	02/17/2015	Chris Ryan, Government of Alberta	LCFS0052433
38	02/17/2015	Don Gilstrap, Chevron	LCFS0052440
39	02/17/2015	Matthew Plummer, PG&E	LCFS0052478
40	02/17/2015	Cathy Reheis-Boyd	LCFS0052481
41	02/17/2015	Miles Heller, Tesoro	LCFS0052576
42	02/17/2015	Simon Mui	LCFS0052581
43	02/17/2015	Joshua Willter, Sierra Research	LCFS0052594
44	02/17/2015	Daniel Sinks, Phillips 66	LCFS0052596
45	02/17/2015	Joyce Dillard	LCFS0052599

46	02/17/2015	Joshua Willter, Sierra Research	LCFS0052603
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49	02/17/2015	Joshua Willter, Sierra Research	LCFS0055777
50	02/17/2015	Joshua Willter, Sierra Research	LCFS0056928
51	02/17/2015	Joshua Willter, Sierra Research	LCFS0058518
52	02/17/2015	Melinda Hicks, Kern Oil & Refining Co	LCFS0062170
53	02/17/2015	Jenny Bard	LCFS0062175
54	02/17/2015	Reid Detchon, Energy Future Coalition	LCFS0062818
55	02/17/2015	Reid Detchon, Energy Future Coalition	LCFS0062190
56	02/17/2015	Reid Detchon, Energy Future Coalition	LCFS0062197
57	02/17/2015	Ross Nakasone, BlueGreen Alliance	LCFS0062207
58	02/17/2015	Reid Detchon, Energy Future Coalition	LCFS0062210
59	02/17/2015	Reid Detchon, Energy Future Coalition	LCFS0062215
60	02/17/2015	Brian Nowicki, Center for Biological Diversity	LCFS0062224
61	02/17/2015	Dayne Delahoussaye	LCFS0062234
62	02/17/2015	Stefan Unnasch, Life Cycle Associates LLC	LCFS0062239
63	02/17/2015	Dayne Delahoussaye	LCFS0062248
64	02/17/2015	Ted Kniesche, Fulcrum BioEnergy Inc.	LCFS0062261
65	02/17/2015	Stefan Unnasch, Life Cycle Associates LLC	LCFS0062265
Public Hearing of the Air Resources Board February 19, 2015			
1	02/19/2015	Transcript of the February 19, 2015 Hearing	LCFS0062272
2	02/19/2015	Copies of Slide Presentation from the February 19, 2015 Board Hearing	LCFS0062537
3	02/19/2015	Resolution 15-6	LCFS0062578
4	02/19/2015	Attachment A: Staff's Suggested Modifications to the Original Proposal	LCFS0062583
Written Comments Presented During The February 19, 2015 Hearing			
1	02/24/2015	Leticia Phillips, UNICA	LCFS0062584
2	02/24/2015	Susan Lafferty, Sutherland	LCFS0062593
3	02/24/2015	Thomas Darlington, POET	LCFS0062596
4	02/24/2015	Shannon Baker-Bransletter, Consumers Union & Consumer Reports	LCFS0062598
5	02/24/2015	Gary Grimes, ALON USA	LCFS0062601
6	02/24/2015	Bonnie Gen-Holmes, American Lung Association	LCFS0062606
7	02/24/2015	Jonathan Lewis, Clean Air Task Force	LCFS0062609
8	02/24/2015	Colin Murphy, NextGen Climate	LCFS0062629
9	02/24/2015	Graham, Noyes, Low Carbon Fuels Coalition	LCFS0062653
10	02/24/2015	Joe Gershen	LCFS0062657
11	02/24/2015	Lisa Mortenson, Community Fuels	LCFS0062659
12	03/04/2015	Joshua Willter, Sierra Research	LCFS0062663
First 15-Day Notice of Public Availability of Modified Text			
1	06/04/2015	Notice of Public Availability of Modified Text and Availability of Additional Documents	LCFS0063225
2	06/04/2015	Attachment A-Modified Regulation Order	LCFS0063239

Documents Incorporated by Reference by First 15-Day Notice			
1	12/31/2014	Agro-Ecological Zone Emissions Factor (AEZ-EF) model (December 31, 2014), incorporated at section 95481(a)(3)	LCFS0063353
2	05/22/2015	California-modified Greenhouse Gases, Regulated Emissions, and Energy use in Transportation model, Version 2.0-T1 (CA-GREET 2.0-T1) (May 22, 2015), incorporated at sections 95481(a)(17) and 95488(c)(4)(F)1.a.	LCFS0063591
3	05/22/2015	California-modified Greenhouse Gases, Regulated Emissions, and Energy use in Transportation model, Version 2.0-T2 (CA-GREET 2.0-T2) (May 22, 2015), incorporated at sections 95481(a)(17) and 95488(c)(4)(F)1.b.	LCFS0064637
4	04/06/2015	Oil Production Greenhouse Gas Emissions Estimator (OPGEE) model, Version 1.1 Draft E (April 6, 2015), incorporated at section 95481(a)(61)	LCFS0065562
Additional References Identified in First 15-Day Notice			
1	01/08/2007	Governor's White Paper. <i>The Role of a Low Carbon Fuel Standard in Reducing Greenhouse Gas Emissions and Protecting Our Economy.</i> January 8, 2007	LCFS0065729
2	2008	Argonne National Laboratory 2008. Full Fuel-Cycle Comparison of Forklift Propulsion Systems	LCFS0065739
3	01/23/2015	Malins, C., Nic Lutsey, Sebastian Galarza, Zhenying Shao, Stephanie Searle (ICCT), Claire Chudziak, Maarten van den Berg. "Potential low carbon fuel supply to the Pacific Coast region of North America." January 23, 2015	LCFS0065779
4	2010-2012	Government of Brazil, Empresa de Pesquisa Energetica Agency of the Ministry of Mines and Energy. "Brazilian Energy Balance (for 2010-2012)"	LCFS0065940
5	07/10/2014	U.S. Department of Energy. "EV Project Electric Vehicle Charging Infrastructure Summary Report." July 10, 2014	LCFS0065941
6	2015	California Energy Commission. 2015. "2014 Draft Integrated Energy Policy Report Update. Publication Number: CEC-100-2014-001-CMF	LCFS0066065
7	09/2012	David Roland-Holst, University of California, Berkeley. "Plug-in Electric Vehicle Deployment in California: An Economic Assessment." September 2012	LCFS0066275
8	06/27/2014	Pennsylvania State University. <i>Federal Transit Bus Test.</i> Report Number: LTI-BT-R1307. June 27, 2014.	LCFS0066324
9	04/2012	Pennsylvania State University. Research Study. STURAA Test, 12 Year 500,000 Mile Bus from Proterra, Inc., Model BE-35. April 2012.	LCFS0066480
10	11/2012	Pennsylvania State University. Research Study. Partial STURAA Test, 12 Year 500,000 Mile Bus from New Flyer of America. Model XD40. November 2012.	LCFS0066603

11	03/2014	California Air Resources Board. "Low Carbon Fuel Standard Re-Adoption Concept Paper." March 2014.	LCFS0066664
12	06/24/2014	Eric Sauer, California Trucking Association. Comment letter to ARB. June 24, 2014.	LCFS0066697
13	06/05/2014	Michael S. Waugh, ARB. Letter to Growth Energy. June 5, 2014.	LCFS0066705
14	04/01/2015	Chris Hessler, AJW. "Brazilian flow realities to California for 2020." E-mail correspondence to Wes Ingram, ARB. April 1, 2015.	LCFS0066708
15	03/03/2014	California Air Resources Board. Method 2B Application: Great Plains Ethanol, LLC dba Poet Biorefining Chancellor Corn and Sorghum Ethanol. March 3, 2014.	LCFS0066711
16	04/14/2014	California Air Resources Board. Carbon Intensity for Costa Pinto Mill, Raizen Energia S.A. Method 2B Application for Brazilian Sugarcane Molasses-Based Ethanol. April 14, 2014.	LCFS0066717
17	10/24/2014	Sao Miguel dos Campos, Alagoas State, Brazil, GranBio BioFlex Plant Method 2B Application for the Production of Cellulosic Ethanol from Brazilian Sugarcane Straw Residue. October 24, 2014.	LCFS0066724
18	09/23/2009	California Air Resources Board, "Detailed California-Modified GREET Pathways of Brazilian Sugarcane Ethanol: Average Brazilian Ethanol, with Mechanized Harvesting and Electricity." September 23, 2009.	LCFS0066734
19	07/20/2007	Wang, M. Center for Transportation Research, Argonne National Laboratory. "WTW Energy Use and GHG Emission of Brazilian Sugarcane Ethanol Production Simulated by Using the GREET Model." July 20, 2007.	LCFS0066786
20	01/18/2007	Executive Order S-01-07	LCFS0066787
21	04/09/2015	California Air Resources Board. "Default Credit Calculation for Innovative Crude Production Methods." April 9, 2015.	LCFS0066789
22	04/10/2015	California Air Resources Board. "Estimating Carbon Intensity Values for the Crude Lookup Table." April 10, 2015.	LCFS0066792
23	04/08/2015	California Air Resources Board. "Explanation of Modifications to the 2010 Carbon Intensity Portion of California Reformulated Gasoline Related to Ethanol Content." April 8, 2015.	LCFS0067031
24	05/22/2015	California Air Resources Board. "Analysis of Compliance Curve Reflecting the Impact of May 2015 Proposed 15-Day Changes." May 22, 2015.	LCFS0067033
25	05/13/2015	Richard W. Corey, ARB Executive Officer. Richard W. Corey to Mary Nichols, Chairman, and Air Resources Board. "Second Advisory Panel Review of the Low Carbon Fuel Standard Program" (including transcript). May 13, 2015.	LCFS0067034

26	05/05/2015	Gerald W. Bowes, Ph.D., State Water Resources Control Board. Letter to Jim Aguila, ARB. "Request for External Peer Review of Staff's Methodology in Calculating Fuel Carbon Intensities and Use of Three Life Cycle Greenhouse Gas Emissions Models" (including External Scientific Peer Reviews and other documents). May 5, 2015 (available at http://www.arb.ca.gov/fuels/lcfs/peerreview/peerreview.htm)	LCFS0067263
27	03/2015	California Air Resources Board. "Staff Report: Calculating Life Cycle Carbon Intensity Values of Transportation Fuels in California." March 2015 (available at http://www.arb.ca.gov/fuels/lcfs/peerreview/peerreview.htm)	LCFS0067331
28	03/2015	California Air Resources Board. "Staff Report: Calculating Carbon Intensity Values of Crude Oil Supplied to California Refiners." March 2015 (available at http://www.arb.ca.gov/fuels/lcfs/peerreview/peerreview.htm)	LCFS0067396
29	03/2015	California Air Resources Board. "Staff Report: Calculating Carbon Intensity Values from Indirect Land Use Change of Crop-Based Biofuels." March 2015 (available at http://www.arb.ca.gov/fuels/lcfs/peerreview/peerreview.htm)	LCFS0067495
Supplemental Documents Identified in First 15-Day Notice			
1	06/05/2014	E-mail from Susan Boland to Chan Pham, with three attachments (the attachments are on a compact disc due to their large size and Microsoft Excel format).	LCFS0067548
2	06/05/2014	E-mail from Stefan Unnasch to Hafizur Chowdhury, with attachment.	LCFS0067549
3	03/04/2014	E-mails between Anil Baral, Adam Brandt, and James Duffy.	LCFS0067559
4	04/11/2014	E-mail from Nathan Parker to Jeremy Herbert, with attachment.	LCFS0067563
5	07/31/2014	E-mails between Jennifer Pont, Stefan Unnasch, and Chan Pham.	LCFS0067576
6	03/27/14	E-mails between Nathan Parker and Kirsten King, with attachment.	LCFS0067580
7	06/30/2014	E-mail from Chris Brown to Kirsten King.	LCFS0067634
8	10/23/13	E-mail from Nathan Parker to Kirsten King, with attachments.	LCFS0067635
9	03/27/2014	E-mail from Paul Gruber to Jim McKinney, with attachment.	LCFS0067655
Public Comments Received During The First 15-Day Comment Period			
1	06/04/2015	Kent F. Leacock, Proterra	LCFS0067707
2	06/09/2015	Elon Rubin, Beyond Energy	LCFS0067710
3	06/16/2015	Rocky Elgie	LCFS0067718
4	06/16/2015	John O'Donnell, GlassPoint Solar	LCFS0067720

5	06/17/2015	Tom Koehler	LCFS0067723
6	06/17/2015	Senator Jean Fuller and Andy Vidak	LCFS0067724
7	06/18/2015	Jim Elrod	LCFS0067727
8	06/18/2015	Steven Gomez, Plumbers & Steamfitters Local Union 460	LCFS0067729
9	06/18/2015	Gary Grimes, Paramount Petroleum	LCFS0067731
10	06/18/2015	Shelby Neal, National Biodiesel Board	LCFS0067735
11	06/19/2015	Christopher Hessler, AJW, Inc.	LCFS0067738
12	06/19/2015	Elena Guilfoil, Washington State Department of Ecology	LCFS0067740
13	06/19/2015	Eileen Tutt, CaETC	LCFS0067742
14	06/19/2015	Jon Constantino, Manatt, Phelps & Phillips LLC	LCFS0067744
15	06/19/2015	Tom Darlington, POET	LCFS0067746
16	06/19/2015	Tom Darlington, POET	LCFS0067750
17	06/19/2015	Logan Caldwell, Houston Biofuels Consultants LLC	LCFS0067756
18	06/19/2015	Todd Campbell, Clean Energy Fuels	LCFS0067762
19	06/19/2015	Elena Guifoil, Washinton State Department of Ecology	LCFS0067764
20	06/19/2015	Philip, Guillemette, Flint Hills Resources LP	LCFS0067766
21	06/19/2015	Rob Del Core	LCFS0067768
22	06/19/2015	Evan Edgar, Efgar & Associates	LCFS0067770
23	06/19/2015	John Duff, National Sorghum Producers	LCFS0067773
24	06/19/2015	Jennifer Pont, Life Cycle Associates, LLC	LCFS0067775
25	06/19/2015	Logan Caldwell, Houston BioFuels Consultants, LLC	LCFS0067777
26	06/19/2015	Bryce Meeker, AltEn, LLC	LCFS0067780
27	06/19/2015	Jan Koninckx	LCFS0067785
28	06/19/2015	Logan Caldwell, Houston BioFuels Consultants LLC	LCFS0067790
29	06/19/2015	Logan Caldwell, Houston BioFuels Consultants LLC	LCFS0067792
30	06/19/2015	Logan Caldwell, Houston BioFuels Consultants LLC	LCFS0067794
31	06/19/2015	Lisa Draney, Murex LLC	LCFS0067797
32	06/19/2015	Logan Caldwell, Houston BioFuels Consultants LLC	LCFS0067800
33	06/19/2015	Gus, Block, Nuvera Fuel Cells	LCFS0067802
34	06/19/2015	Philip Guillemette, Flint Hills Resources	LCFS0067804
35	06/19/2015	Tim Carmichael, California Natural Gas Vehicle Coalition	LCFS0067808
36	06/19/2015	Logan Caldwell, Houston BioFuels Consultants LLC	LCFS0067817
37	06/19/2015	Logan Caldwell, Houston BioFuels Consultants LLC	LCFS0067819
38	06/19/2015	Logan Caldwell, Houston BioFuels Consultants LLC	LCFS0067821
39	06/19/2015	Leticia Phillips, UNICA	LCFS0067823

40	06/19/2015	Miles Heller, Tesoro	LCFS0067825
41	06/19/2015	Anne Smart	LCFS0067830
42	06/19/2015	John Van de North, NexSteppe Inc.	LCFS0067835
43	06/19/2015	Catherine Reheis Boyd, WSPA	LCFS0067839
44	06/19/2015	Jessica Hoffmann, RPMG, Inc.	LCFS0067856
45	06/19/2015	Joshua Willter, Sierra Research	LCFS0067861
46	06/19/2015	Rudy Salas	LCFS0067867
47	06/19/2015	Jeremy Waen, Marin Clean Energy	LCFS0067869
48	06/19/2015	Carol Tjong, White Energy	LCFS0067878
49	06/19/2015	Melinda Hicks, Kern Oil & Refining Co.	LCFS0067880
50	06/19/2015	Stephanie Batchelor	LCFS0067885
51	06/19/2015	Will Barrett, American Lung Association in California	LCFS0067889
52	06/19/2015	Jessica Hoffmann, Renewable Products Marketing Group, LLC	LCFS0067892
53	06/19/2015	Kevin Lee, NRG EVgo	LCFS0067894
54	06/19/2015	Bill Elrick, CaFCP	LCFS0067899
55	06/19/2015	Clarke Pauley, CR&R Environmental Services	LCFS0067902
56	06/19/2015	Graham, Ellis, Solazyme, Inc.	LCFS0067906
57	06/19/2015	Celia DuBose, California Biodiesel Alliance	LCFS0067910
58	06/24/2015	John Spaulding	LCFS0067912
59	07/02/2015	Eileen Tutt, California Electric Transportation Coalition	LCFS0067914
Second 15-Day Notice of Public Availability of Modified Text			
1	06/23/2015	Second Notice of Public Availability of Modified Text	LCFS0067917
2	06/23/2015	Attachment A-Second 15-Day Modified Regulation Order	LCFS0067922
Public Comments Received During the Second 15-Day Comment Period			
1	06/30/2015	Logan Caldwell, Houston BioFuels Consultants LLC	LCFS0068193
2	06/30/2015	Logan Caldwell, Houston BioFuels Consultants LLC	LCFS0068195
3	06/30/2015	Logan Caldwell, Houston BioFuels Consultants LLC	LCFS0068197
4	06/30/2015	Logan Caldwell, Houston BioFuels Consultants LLC	LCFS0068199
5	07/08/2015	John Greene	LCFS0068201
6	07/08/2015	Karen Connors	LCFS0068204
7	07/08/2015	Marie-Helene Labrie	LCFS0068210
8	07/08/2015	Joshua Willter, Sierra Research	LCFS0068215
9	07/08/2015	Tim Carmichael, California Natural Gas Vehicle Coalition	LCFS0068637
10	07/08/2015	Carol Tjion, White Energy	LCFS0068645
11	07/08/2015	Jan Koninckx	LCFS0068647
12	07/08/2015	Geoff Cooper	LCFS0068652
13	07/08/2015	Graham Ellis, Solazyme, Inc.	LCFS0068718

Third 15-Day Notice of Public Availability of Modified Text			
1	07/31/2015	Third Notice of Public Availability of Modified Text and Availability of Additional Documents	LCFS0068723
2	07/31/2015	Attachment A-Third 15-Day Modified Regulation Order	LCFS0068727
Additional Documents Added to Record Identified in Third 15-Day Notice			
1	2012	CD of datasets assembled by Juan Francisco Rosas-Perez, used in his 2012 dissertation, and referenced by Dr. David Rocke in his report "Statistical Issues Related to the Low Carbon Fuel Standard" which is already in the rulemaking file.	LCFS0068998 LCFS0068998
2	11/13/2014	Spreadsheet dated 11/13/2014 and titled "Estimate of Electricity Use by ZEVs"	LCFS0068999
3	2012	Food and Agricultural Policy Research Institute (FAPRI) World Agricultural Outlook, available at http://www.fapri.iastate.edu/outlook/2012/tables/5-Biofuels.pdf (referenced on page B-15 of Appendix B to the ISOR).	LCFS0069000
4	06/06/2013	ARB report, titled "Energy Efficiency and Co-Benefits Assessment of Large Industrial Sources: Refinery Sector Public Report," available at http://www.arb.ca.gov/cc/energyaudits/eeareports/refinery.pdf (referenced on pages II-22 and III-55 of the ISOR).	LCFS0069004
Public Comments Received During The Third 15-Day Comment Period			
1	08/17/2015	Jan Koninckx	LCFS0069080
2	08/17/2015	Josh Willter, Sierra Research	LCFS0069084
Public Hearing of the Air Resources Board September 24-25, 2015			
1	09/21/2015	The LCFS regulation proposed text, incorporation all 15-day changes	LCFS0069854
2	09/21/2015	Final Environmental Analysis	LCFS0070110
3	09/21/2015	Response to Comments on the EA	LCFS0070434
4	09/24/2015	Responses to Comments on the Low Carbon Fuel Standard Regulation	LCFS0071421
5	09/24/2015	Copies of Slide Presentation from the September 24, 2015 Hearing	LCFS0075490
6	09/25/2015	Transcript of the September 24, 25, 2015 Hearing	LCFS0075500 LCFS0075704
7	09/25/2015	Supplemental Responses to Comments on the Low Carbon Fuel Standard Regulation	LCFS0075799
8	09/25/2015	Supplement to the Responses to Comments on the Environmental Analysis	LCFS0075823
9	10/02/2015	Final Statement of Reasons (FSOR)	LCFS0075833
10	10/02/2015	Updated Informative Digest	LCFS0080296
11	10/02/2015	Notice of Decision	LCFS0080307
12	10/05/2015	Resolution 15-36	LCFS0080309
13	10/05/2012	Attachment D-Findings and Statement of Overriding Considerations	LCFS0080315
14	10/05/2015	Resolution 15-51	LCFS0080329

Written Comments Presented During The September 24-25, 2015 Hearing			
1	09/28/2015	John Kinsey, Growth Energy ⁱⁱ	LCFS0080333 LCFS0080715
2	09/28/2015	Bonnie Gen-Holmes	LCFS0080554
3	09/28/2015	Gary Grimes, ALON USA	LCFS0080558
4	09/28/2015	Tim Taylor, Airlines 4 America	LCFS0080561
Final Rulemaking Package			
1	11/16/2015	Endorsed Form 400	LCFS0080563
2	11/16/2015	Final Regulation Order	LCFS0080565
3	11/16/2015	Addendum to FSOR	LCFS0080713

ⁱ This reference is to an entire book. Rather than place the entire book in the record, the parties have agreed to include only the inside cover and copyright pages and to reserve the right to seek record augmentation or judicial notice if other pages from the book should either party deem that necessary in the future.

ⁱⁱ This comment is a duplicate of Growth Energy's comment on the ADF at this same hearing. In the interest of brevity, the materials in the CD attached to this comment are included only once in the record (with the LCFS comment).