

AB 32 Implementation Group

Working Toward Greenhouse Gas Emission Reductions
And Enhancing California's Competitiveness

March 3, 2009

Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento CA 95814

Re: Low Carbon Fuel Standard

Dear Chairman Nichols:

We are writing to express our serious concern about the California Air Resources Board's failure to complete and release all of the life cycle analyses and economic analysis of the Low Carbon Fuel Standard (LCFS), and to receive and respond to public comment on those analyses, before finalizing and releasing its regulation package for the LCFS.

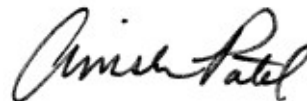
In December of 2008, CARB committed to conduct thorough economic analysis of each of the measures to be adopted pursuant to the AB 32 Scoping Plan. For that analysis to inform your staff's recommendations to the Board, as well as the Board's decision-making, it must be the subject of public comment and consideration by your staff and Board members before recommendations are made to the Board. Otherwise, the public and the Board will not be adequately informed about the available policy options in implementing a workable LCFS.

Given that CARB has not released its economic and environmental analysis, much less taken comment on those analyses, we believe that the LCFS is not ready for an adoption hearing in April of 2009 and should be deferred.

We would be happy to discuss this matter further with you at your convenience,



Dorothy Rothrock
Vice-President
California Manufacturers &
Technology Association



Amisha Patel
Policy Advocate
California Chamber of Commerce

cc: Cindy Tuck
Linda Adams
Darren Bouton
Victoria Bradshaw
David Crane
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