

BP America, Inc

Ralph J. Moran 1201 K Street, Suite 1990 Sacramento, CA 95814 (916) 554-4504

DATE: September 3, 2009

Via Email and Electronic Submittal

Bob Fletcher Division Chief Stationary Source Division California Air Resources Board

Re: Indirect Land Use Change Working Group

Dear Bob,

During the August 5th Low Carbon Fuel Standard Workshop, staff indicated that an updated ILUC Expert Work Group Proposal would be released in August for a Mid-September workshop and discussion. BP recognizes the importance of this Work Group in resolving outstanding, complex technical questions that could have an impact on the carbon intensity scores of all biofuels. This letter contains suggestions for candidates we believe would make substantial contributions to the capabilities and success of this important Working Group.

Please feel free to contact me to discuss these issues in more detail.

Sincerely,

Ralph J. Moran BP America, Inc

BP America, Inc Comments to California Air Resources Board on LCFS

BP's Work Group Nominations

Nomination #1: Dr. David Roland Holst:

Adjunct Professor Department of Agricultural & Resource Economics Department of Economics University of California, Berkeley

Key Qualifications:

ARB Criteria ¹	Relevant Qualifications
Skills to Conduct	Extensive experience applying economic equilibrium
Objective	models to measuring the impacts of policies on socio-
Technical-Level	economic and environmental systems.
Analysis for Policy	
Development	
Demonstrated	Professor Roland-Holst's publications are available at
Skill Sets through	his online CV
Peer Reviewed	http://are.berkeley.edu/~dwrh/
Publications	TILLP.//are.berkeley.edu/~dwff/
Fublications	

Nomination #2: Dr Evan Delucia

G. William Arends Professor of Biology University of Illinois at Urbana-Champaign Director of the School of Integrative Biology

Key Qualifications:

Criteria	Relevant
Skills to Conduct	Professor DeLucia's research focuses on the
Objective	environmental impacts of biofeedstock production.
Technical-Level	DeLucia's Lab is one of the few in the country that
Analysis for	directly measure the environmental attributes of new
Policy	cellulosic biofuel feedstocks (particularly their ability to
Development	sequester carbon).
Demonstrated	A list of Professor DeLucia's Publications are available
Skill Sets	at:
through Peer	http://www.life.illinois.edu/delucia/publications.htm
Reviewed	
Publications	
Other Evidence	Additional awards and activities are available here:
	http://www.life.illinois.edu/delucia/delucia.htm

 $^{^{\}rm 1}$ As specified in "Low Carbon Fuel Standard Proposal for and Expert Workgroup" Preliminary Draft August 3, 2009

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Other's Nominees that BP Supports

An original note to CARB listed a more expansive set of nominees. An abbreviated and refined list is below. We would also support the following nominations:

Expert Type	Recommendations
GTAP Modelers	 David Roland Holst, UC Berkeley Angelou Gurkel, Univ. of Sao Paolo
Agricultural Environmental Specialists	Dr Evan DeLucia, University of Illinois
Systems Engineers/LCA Modelers	4. John Sheehan, University of Minnesota
Environmental/Carbon Policy Expert	John DeCicco, University Of Michigan
Time Treatment of Carbon	6. David Harrison, Jr.
USA/EU Regulators	7. Paul Hodson from European Commission Interservice Group on ILUC