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To Whom It May Concern:

The low carbon fuel standard is one of the most ambitious and complex environmental regulations every attempted in California. Why are we treating it like an obscure administrative procedure?

The LCFS is one of the largest components of AB 32 and likely to be one of the most expensive. Yet your staff has failed to complete critical economic, technical and environmental studies necessary to successfully develop and implement the rule. Still, they tell us it won't cost much, and seem to think that by decreasing the development of new fuels and vehicles will make it happen despite daunting scientific, technological and cost hurdles.

Unfortunately, wishing doesn't make it so, and when the real bill comes it will be a rude awakening for the businesses and consumers who have to pay.

I'm reminded of the recent news about CARB's requirement that gas stations upgrade their pumps to a stricter environmental standard. When the deadline came, thousands of station owners were out of compliance because they couldn't afford to make the upgrade. Despite a plea from the Governor, CARB refused to extend the deadline, putting all these businesses and jobs at risk of closure for failing to comply.

As the Governor said, we can't afford to saddle small businesses with more expensive environmental regulations. And the gas pump experience is infinitesimal compared to what the Low Carbon Fuel Standard will require.

As a small business owner who supports AB 32, I ask that you take the time to exercise due diligence before proceeding with this rule.

Respectfully,


James Brady
CEO Con10u, Inc.