

Sven Thesen
09-4-4
better place 

April 22, 2009

The Honorable Mary Nichols
Chairman, California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Low Carbon Fuel Standard Support Letter

Dear Chairman Nichols,

Better Place would like to thank the California Air Resources Board (ARB) staff for their hard work in completing the Low Carbon Fuel Standard and the opportunity to offer our comments on said proposed regulation. In summary, Better Place strongly supports the LCFS and recommends full and immediate adoption as currently drafted.

As you and your staff are aware, the LCFS was first announced by Governor Schwarzenegger as Executive Order S-01-07 in January of 2007. Two documents were then generated by the University of California: A Policy Analysis report and a Technical Analysis report. In part based on these documents, ARB then began the regulatory process with numerous workshops, drafts and working groups. Through this long process, in which numerous issues were raised and addressed and various compromises made, ARB has given ample time for stakeholder input and consideration and the regulation is now ready to be approved as currently proposed. As such we particularly recommend against any resolutions or other modifications that might otherwise delay implementation.

Further, we concur with CALSTART's LCFS comments dated April 15, 2009 detailing the need for urgency in implementing this regulation:

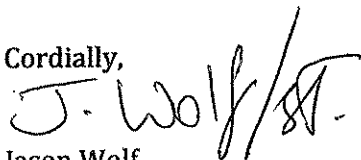
"Encourage Early Reductions and Avoid Delays

Recent research suggests that policymakers should strive to encourage increased near term emissions reductions. It now appears that the Intergovernmental Panel on Climate Change may have underestimated the impacts of climate change. Furthermore, there is increasing evidence that suggests that the climate change effects of greenhouse gas emissions will be largely irreversible and potentially abrupt. In light of these warnings from the scientific community, there is a clear need to accelerate emissions reductions through intelligent policy choices and timely implementation of climate regulations and programs such as the LCFS."

We look forward to the expedient approval and implementation of this regulation.

Should you have any questions, please do not hesitate to contact Sven Thesen at (415) 225-7645 or me.

Cordially,



Jason Wolf
Vice President Business Development, California

CC: Anthony Eggert & Dean Simeroth, ARB