

James Lutch

09-4-4

My name is James Lutch, I am the owner and operator of Simple Fuels Biodiesel, a Northern California biofuels producer focusing on biodiesel production from locally produced waste grease.

We wish to express our support for accelerated implementation of the LCFS, as increasing the use of biodiesel has the ability to create immediate and substantial carbon reduction, using currently available technology on both production and consumption ends of the spectrum. We support the complete lifecycle and pathways analysis so as to promote production and consumption of biofuels from local sources whenever possible. While California has a low potential for native oilseed crops, it offers a substantial resource in the form of waste oil. The local nature of this resource offers maximum carbon reduction due to its inherently efficient energy pathway and zero land use.

Lifecycle analysis also will help to encourage support of algae-based feedstock, which we expect to comprise an increasingly larger portion of the feedstock pool in the coming decades. California is an ideal climate for algae production, as evidenced by the fact that the largest study of algae as a biodiesel feedstock to date, conducted by NREL, used Californian desert, ocean water, and Sacramento Valley agricultural runoff, as their case study. In addition, the largest algae research companies in the world are based in the bay area.

Apart from maintaining California's position as a pioneer in technology, encouraging local feedstock production will offer significant additional benefit to local and state economies.

All fuels are not created equal, and the current technological and acceptance levels of biodiesel, coupled with the ability for technological growth from advanced feedstocks, will allow California to remain a leader in the next generation of fuel standards.

Sincerely,
James Lutch
Simple Fuels Biodiesel