jennifer canvasser

7118 palo verde road, • irvine, CA 92617

Mary Nichols, Chair, California Air Resources Board 1001 I Street Sacramento, CA 95812

Subject: Adopt a strong low carbon fuel standard

Dear Ms. Nichols and Air Resources Board members,

I strongly support the proposed Low Carbon Fuel Standard that the California Air Resources Board will consider adopting at its April hearing. The LCFS would reduce global warming pollution from motor vehicle fuels by 10 percent by 2020 and is a critical part of California's overall strategy to fight global warming.

The Low Carbon Fuel Standard would force oil companies to invest in clean alternative fuels needed to meet the state's global warming pollution reduction goals. Absent a strong standard, the oil companies will instead invest in producing more oil, including highly polluting, environmentally devastating fossil fuels made from tar sands in Canada, oil shale in the western United States and even converting coal into liquid fuel. Contrary to claims by the oil industry, the LCFS would benefit the economy by helping protect consumers from high oil prices by forcing oil companies to diversify our fuel supply that is currently 97 percent dependent on petroleum.

The Low Carbon Fuel Standard is also critical to ensuring that America implements biofuels policies correctly. The biofuels standard would incentivize a rapid transition away from cornbased ethanol and toward advanced biofuels made from non-food crops. But it is also important to ensure that moving forward with low carbon fuels does not make other environmental problems worse. That is why I urge the board to adopt, as part of the LCFS, strong safeguards to protect California's public lands and sensitive ecosystems, and to develop sustainability metrics that encourage broadly sustainable biofuels. The board also must consider emissions from using biofuels that consume land where food can be grown by including an "indirect land use change" emission factor.

Now is the time for California to continue its leadership in solving global warming. If adopted with the right environmental safeguards, California's Low Carbon Fuel Standard will act as a model that can be replicated in other states, at the national level and even in other countries. I urge the board to adopt a low carbon fuel standard with strong environmental safeguards as soon as possible.

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