

Dear Chairwoman Nichols,

Thank you for your leadership developing California's Low Carbon Fuel Standard (LCFS), which, if done right, will spur innovation, create jobs, and move us toward a stronger clean energy economy.

In creating the LCFS, it's critical to account for all the global warming pollution associated with producing a fuel. That's why I appreciate the California Air Resources Board's plan to include the carbon released by changes in land use caused by biofuels, whether it's the direct or indirect effects of clearing land to grow fuel crops. Ignoring these land use changes could dramatically overestimate the carbon benefits of new fuels; in fact, the proposed LCFS should raise its estimates for emissions from such indirect effects.

In addition, please strengthen the proposed LCFS regulation by ensuring that it:

- * results in a new generation of ultra low-carbon fuels;
- * safeguards the ecology of sensitive ecosystems, including our federal lands and forests;
- * promotes sustainable fuels that avoid unintended environmental and social harms, such as raising food prices; and
- * protects California's air quality and public health.

Thank you for keeping California a leader in addressing global warming, and please do all you can to develop a strong LCFS.

Sincerely,

Joe Salazar
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