

23 February 2011

Mr. John Courtis
Manager, Alternative Fuels Section
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
By email -

Hello John,

I am writing to provide comments on the draft document "Detailed California-Modified GREET pathway for Corn Oil Biodiesel (COB)," which was posted on the ARB Low Carbon Fuel Standard (LCFS) website on Dec. 14th, 2010.

In the proposed Low Carbon Fuel Standard LCFS pathway for COB, ARB treats corn oil extraction differently than other similar products. The proposed approach does not allocate emissions associated with production and processing of feedstock to obtain COB and despite adding this new co-product, ARB does not appear to propose corresponding adjustments to the ethanol production pathway that generates the corn oil as a co-product. The pathway for COB should be consistent with the approach used for other fuels under the LCFS.

Recommendation: a clear and consistent approach for allocation of emissions and benefits in alternative fuel pathways should be applied in a manner that is consistent with ISO standards for life-cycle assessment. More detailed analysis and examples of how to achieve this have been provided by others (see for example, the submission from Stefan Unnasch).

Thank you for consideration of this comment.
With my best regards,

A handwritten signature in black ink, appearing to read 'Keith Kline', with a stylized, cursive script.

Keith Kline
Oak Ridge, Tennessee
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