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Branch Chief, LCFS Regulation  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814  
Via Electronic Submission

Re: Comment on Amendments to the Low Carbon Fuel Standard

The management of Renewable Products Marketing Group (RPMG) would like to submit comments in support of the proposed amendments to the California Low Carbon Fuel Standard (LCFS) as those amendments pertain to ethanol and oxygenate for blending with CARBOB or gasoline and biomass-based diesel for blending with CARB diesel. Specifically, RPMG wishes to commend California Air Resources Board (CARB) staff for the proposed amendments to Section 95480.2 "Persons Eligible for Opting into the LCFS Program" and Section 95481 "Definitions and Acronyms". The proposed language will provide out-of-state producers and oxygenate suppliers the much needed ability to more fully participate in the LCFS program as a regulated party. By allowing out-of-state producers to opt-in as regulated parties and by defining the owner of the liquid transportation fuel as the importer, the program will better enable suppliers of low carbon fuel to participate in Carbon Credit trading and further help the state of California reach its goals of reducing Carbon emissions.

RPMG also wishes to convey our concern with the length of time it has taken to implement the proposed amendments to the LCFS program as they pertain to oxygenate for blending and biomass-based diesel. RPMG has been closely monitoring the progression of these regulations since early 2010. We understand changes of this magnitude take time to design and effectively implement. It is our opinion the regulated industry has reached the point where we are now ready to have Section 95480.2 "Persons Eligible for Opting into the LCFS Program" and Section 95481 "Definitions and Acronyms" fully adopted and approved by CARB. If CARB requires more time to craft and implement Section 95482 "Average Carbon Intensity Requirements for Gasoline and Diesel" and Section 95486 "Determination of Carbon Intensity Values", we would respectfully request CARB to further consider amendments to these sections separate from the proposed amendments to Sections 95480.2 and 95481. By separating these topics we feel it would help the industry adjust to the proposals made that are of a less controversial nature.

RPMG would once again like to thank CARB for considering our comments and suggestions to improve the LCFS for all industry participants. The biofuels community is ready and able to assist California in its carbon reduction efforts. Enabling all producers and fuel suppliers to perform under the LCFS regulations as regulated parties will benefit the fuels market and the California motorist as the end consumer.

Sincerely,

Jessica Wiechman  
Regulatory and Compliance Manager  
RPMG, Inc.