



Frederick S. Sciance  
Manager  
Environment, Energy & Safety Policy

General Motors Corporation  
Public Policy Center  
482-C27-B76  
300 Renaissance Center  
Detroit, MI 48265-3000

March 4, 2011

Michelle Buffington  
Air Pollution Specialist  
Stationary Source Division  
California Air Resources Board  
1001 "I" Street  
Sacramento, California 95814

Dr. Buffington:

### **General Motors Priorities in LCFS Review**

In response to your request, I have identified five issues that are the most important priorities, from General Motors perspective, for the advisory panel review of the Low Carbon Fuel Standard. General Motors supports the adoption of low carbon fuels, and wants the California Low Carbon Fuel Standard to achieve its goals. Therefore, we are most interested in projections of low carbon fuel supply and usage, and the identification of any new policies that may help the program stay on track. Choosing from the list of thirteen required elements of the advisory panel review, the following five elements most closely correspond to our priorities:

- An assessment of supply availabilities and the rates of commercialization of fuels and vehicles;
- The availability and use of ultralow carbon fuels to achieve the LCFS standards and advisability of establishing additional mechanisms to incentivize higher volumes of these fuels to be used;
- Identification of hurdles or barriers (e.g., permitting issues, infrastructure adequacy, research funds) and recommendations for addressing such hurdles or barriers;
- The LCFS program's progress against LCFS targets;
- Adjustments to the compliance schedule, if needed.

Frederick S. Sciance  
Manager, Environment, Energy and Safety Policy  
General Motors Public Policy Center