

**Supplemental  
Responses to Comments**

on the

**Alternative Diesel Fuel  
Regulation**



**Released September 24, 2015**

to be considered at the

**September 25, 2015 Board Hearing**

## I. SUMMARY OF COMMENTS AND AGENCY RESPONSE

Written and oral comments were presented at the Board Hearing.

<b>Comment Code</b>	<b>Comment Period Received</b>
SB	Comments received in written materials during the second board hearing, September 24 & 25, 2015
ST	Comments received as testimony at the second board hearing on September 24 & 25, 2015

The comment letters were coded by the order and the comment period in which they were received, and also tagged ADF, and the name of the organization or individual commenting. One comment letter was directed at both the ADF and LCFS rulemaking. The comments directed at the ADF rulemaking are responded to below. The comments directed at the LCFS rulemaking are responded to in the LCFS Final Statement of Reasons.

<b>Comment Letter Code</b>	<b>Commenter</b>	<b>Affiliation</b>
1-SB-ADF-GE	John Kinsey	Growth Energy
1-ST-ADF-SCAQMD	Henry Hogo	SCAQMD
2-ST-ADF-CBA/NBB	Russ Teall	CBA/NBB
3-ST-ADF-Neste	Dayne Delahoussaye	Neste
4-ST-ADF-GE	John Kinsey	Growth Energy
5-ST-ADF-CCA	Bill Magavern	Coalition for Clean Air
6-ST-ADF-CEERT	John Shears	CEERT
7-ST-ADF-NRDC	Simon Mui	National Research Defense Council
8-ST-ADF-CalStart	John Boesel	CalStart

**A. COMMENTS RECEIVED DURING THE SECOND BOARD HEARING,  
SEPTEMBER 24, 2015**

One comment letters were received during the September 24 board hearing.

**1\_SB\_ADF\_GE Responses**

1. Comment: **ADF SB1-1 through ADF SB1-5**

Agency Response: The responses to these comments are in “Responses to Comments on the Supplemental Environmental Analysis for the Low Carbon Fuel Standard and Alternative Diesel Fuel Regulations.”

**B. TESTIMONY RECEIVED DURING THE SECOND BOARD HEARING,  
SEPTEMBER 24, 2015**

Eight stakeholders testified at the September 24 board hearing. The transcript of the testimony is reproduced below with responses following.

**1\_ST\_ADF\_SCAQMD**

2. Comment: **ADF ST1-1**

The comment expresses support for the adoption of the ADF regulation.

Agency Response:

ARB staff appreciates the comment in support of adopting the ADF regulation.

**2\_ST\_ADF\_CBA/NBB**

3. Comment: **ADF ST2-1**

The comment expresses support for the adoption of the ADF regulation.

Agency Response:

ARB staff appreciates the comment in support of adopting the ADF regulation.

**3\_ST\_ADF\_Neste**

4. Comment: **ADF ST3-1**

The comment expresses support for the adoption of the ADF regulation. Specifically the comment appreciates the regulatory approach that addresses the variability in fuel characteristics.

Agency Response:

ARB staff appreciates the comment in support of adopting the ADF regulation.

**4\_ST\_ADF\_GE**

5. Comment: **ADF ST4-1**

The comment recommends the Board not approve the ADF regulation until ARB complies with CEQA, the certified regulatory program, Health and Safety Code, and the Administrative Procedure Act.

Agency Response:

The ADF regulation complies with all requirements under CEQA, ARB's certified regulatory program, the Health and Safety Code, and the Administrative Procedure Act, as documented in the rulemaking file. Please see the Initial Statement of Reasons, the Responses to Comments on the Alternative Diesel Fuel Regulation, the Responses to Comments on the Draft Environmental Analysis for the Low Carbon Fuel Standard and Alternative Diesel Fuel Regulations, the Final Environmental Analysis for the Low Carbon Fuel Standard and Alternative Diesel Fuel Regulations, and the remainder of the rulemaking file.

**5\_ST\_ADF\_CCA**

6. Comment: **ADF ST5-1**

The comment expresses support for the adoption of the ADF regulation.

Agency Response:

ARB staff appreciates the comment in support of adopting the ADF regulation.

**6\_ST\_ADF\_CEERT**

7. Comment: **ADF ST6-1**

The comment expresses support for the adoption of the ADF regulation

Agency Response:

ARB staff appreciates the comment in support of adopting the ADF regulation.

8. Comment: **ADF ST6-2**

The comment requests that ARB track ongoing work related to the diesel deposit issue that was originally researched through the Coordinating Research Council (CRC).

Agency Response:

While the commenter did not specify a particular study, ARB assumes that the comment is directed to an ongoing CRC study of diesel deposit control additives (CRC Project DP-04-13a and 13b). ARB has been following this study and will continue to track this work.

## **7\_ST\_ADF\_NRDC**

9. Comment: **ADF ST7-1**

The comment expresses support for the adoption of the ADF regulation. Specifically the comment appreciates the regulatory approach that addresses the variability in fuel characteristics.

Agency Response:

ARB staff appreciates the comment in support of adopting the ADF regulation.

## **8\_ST\_ADF\_CALSTART**

10. Comment: **ADF ST8-1**

The comment expresses support for the adoption of the ADF regulation.

Agency Response:

ARB staff appreciates the comment in support of adopting the ADF regulation.