

**Comment 1 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 45 Day.**

First Name: Board

Last Name: Clerk

Email Address: Non-web submitted comment

Affiliation:

Subject: EJAC Resolution on LCFS

Comment:

Posted by CARB on behalf of the Environmental Justice Advisory  
Committee.

Attachment: 'www.arb.ca.gov/lists/com-attach/1-lcfs2024-VjMFaQNjUGABWFA0.pdf'

Original File Name: EJAC DRAFT Low Carbon Fuel Standard Recommendations.pdf

Date and Time Comment Was Submitted: 2024-01-05 16:19:01

No Duplicates.

## **Comment 2 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Zoe  
Last Name: Woodcraft  
Email Address: zwoodcraft@gmail.com  
Affiliation:

Subject: Please reform the Low Carbon Fuel Standard  
Comment:

Dear California Air Resources Board,

Your proposed amendments to California's Low Carbon Fuel Standard are a climate policy failure that backslides on the state's role as a climate leader. The program subsidizes combustion fuels to the tune of billions of dollars per year and has no place in our toolkit of climate policies for the 2020s. There is too much on the line for our climate to get this critical program so wrong.

Governor Newsom's budget proposes significant delays and cuts of hundreds of millions of dollars to vital zero-emission transportation programs, which makes it all the more urgent to use the Low Carbon Fuel Standard to more fully support zero-emissions transportation. Historically, California has thrown good money after bad, and devoted 80% of the LCFS's \$3 to 4 billion each and every year to combustion technology. It would be wild to allow these funds to continue to languish on the climate sidelines, instead of anchoring our transition to a zero-emissions future.

The world has changed a lot since the implementation of the LCFS in 2009. Unlike the 2000s, we have a north star goal for our climate and the air we breathe: zero emissions transportation. Continuing to invest the billions in revenue from the LCFS into harmful and polluting biofuels that end up combusted, instead of electric vehicles powered by clean energy, hampers our efforts to fight the climate crisis while enriching oil companies and industrial agriculture.

I urge you to correct your course and modernize the program by reflecting your consensus that the only way to meet air quality standards is through eliminating combustion altogether, not piling on billions of dollars in lavish incentives for combustion each and every year. By focusing on real air pollution solutions, you could add a clean air multiplier to the credits system, especially for public fleets that transport many people at once, would deliver major benefits for California's air quality and throw a lifeline to cash-strapped transit agencies that low-income Californians depend on for mobility.

California cannot meet our clean air and climate goals without harnessing the power of the Low Carbon Fuel Standard and overhauling this multibillion-dollar program for our zero emissions future. Please act expeditiously to reform the program to achieve our state's ambitious goals.

Sincerely,  
Zoe Woodcraft  
5500 Broadway Oakland, CA 94618-1748

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-11 15:29:05

3000 Duplicates.

## **Comment 3 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Andrew  
Last Name: Reich  
Email Address: andrewreich@gmail.com  
Affiliation:

Subject: Please reform the Low Carbon Fuel Standard  
Comment:

Dear California Air Resources Board,

Your proposed amendments to California's Low Carbon Fuel Standard are a climate policy failure that backslides on the state's role as a climate leader. The program subsidizes combustion fuels to the tune of billions of dollars per year and has no place in our toolkit of climate policies for the 2020s. There is too much on the line for our climate to get this critical program so wrong.

Governor Newsom's budget proposes significant delays and cuts of hundreds of millions of dollars to vital zero-emission transportation programs, which makes it all the more urgent to use the Low Carbon Fuel Standard to more fully support zero-emissions transportation. Historically, California has thrown good money after bad, and devoted 80% of the LCFS's \$3 to 4 billion each and every year to combustion technology. It would be wild to allow these funds to continue to languish on the climate sidelines, instead of anchoring our transition to a zero-emissions future.

The world has changed a lot since the implementation of the LCFS in 2009. Unlike the 2000s, we have a north star goal for our climate and the air we breathe: zero emissions transportation. Continuing to invest the billions in revenue from the LCFS into harmful and polluting biofuels that end up combusted, instead of electric vehicles powered by clean energy, hampers our efforts to fight the climate crisis while enriching oil companies and industrial agriculture.

I urge you to correct your course and modernize the program by reflecting your consensus that the only way to meet air quality standards is through eliminating combustion altogether, not piling on billions of dollars in lavish incentives for combustion each and every year. By focusing on real air pollution solutions, you could add a clean air multiplier to the credits system, especially for public fleets that transport many people at once, would deliver major benefits for California's air quality and throw a lifeline to cash-strapped transit agencies that low-income Californians depend on for mobility.

California cannot meet our clean air and climate goals without harnessing the power of the Low Carbon Fuel Standard and overhauling this multibillion-dollar program for our zero emissions future. Please act expeditiously to reform the program to achieve our state's ambitious goals.

Sincerely,  
Andrew Reich  
140 S Irving Blvd Los Angeles, CA 90004-3841

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-14 20:30:30

2999 Duplicates.

**Comment 4 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 45 Day.**

First Name: Via Email

Last Name: To Clerks' Office

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS 2024 Email Form Letter - Stop Dirty Factory Farm Gas in the LCFS

Comment:

Please see attached file.

Attachment: '[www.arb.ca.gov/lists/com-attach/12-lcfs2024-WzcGY1I1VXUGXwFi.pdf](http://www.arb.ca.gov/lists/com-attach/12-lcfs2024-WzcGY1I1VXUGXwFi.pdf)'

Original File Name: LCFS comment.pdf

Date and Time Comment Was Submitted: 2024-01-16 15:35:15

1721 Duplicates.

## **Comment 5 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Douglas  
Last Name: McCormick  
Email Address: mfiinsure@cox.net  
Affiliation:

Subject: Please reform the Low Carbon Fuel Standard  
Comment:

Dear California Air Resources Board,

Your proposed amendments to California's Low Carbon Fuel Standard are a climate policy failure that backslides on the state's role as a climate leader. The program subsidizes combustion fuels to the tune of billions of dollars per year and has no place in our toolkit of climate policies for the 2020s. There is too much on the line for our climate to get this critical program so wrong.

Governor Newsom's budget proposes significant delays and cuts of hundreds of millions of dollars to vital zero-emission transportation programs, which makes it all the more urgent to use the Low Carbon Fuel Standard to more fully support zero-emissions transportation. Historically, California has thrown good money after bad, and devoted 80% of the LCFS's \$3 to 4 billion each and every year to combustion technology. It would be wild to allow these funds to continue to languish on the climate sidelines, instead of anchoring our transition to a zero-emissions future.

The world has changed a lot since the implementation of the LCFS in 2009. Unlike the 2000s, we have a north star goal for our climate and the air we breathe: zero emissions transportation. Continuing to invest the billions in revenue from the LCFS into harmful and polluting biofuels that end up combusted, instead of electric vehicles powered by clean energy, hampers our efforts to fight the climate crisis while enriching oil companies and industrial agriculture.

I urge you to correct your course and modernize the program by reflecting your consensus that the only way to meet air quality standards is through eliminating combustion altogether, not piling on billions of dollars in lavish incentives for combustion each and every year. By focusing on real air pollution solutions, you could add a clean air multiplier to the credits system, especially for public fleets that transport many people at once, would deliver major benefits for California's air quality and throw a lifeline to cash-strapped transit agencies that low-income Californians depend on for mobility.

California cannot meet our clean air and climate goals without harnessing the power of the Low Carbon Fuel Standard and overhauling this multibillion-dollar program for our zero emissions future. Please act expeditiously to reform the program to achieve our state's ambitious goals.

Sincerely,  
Douglas McCormick  
23602 Via Paloma Trabuco Canyon, CA 92679-4123

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-17 07:32:46

486 Duplicates.



**Comment 6 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 45 Day.**

First Name: Mary  
Last Name: Ames  
Email Address: amesink@earthlink.net  
Affiliation:

Subject: Bring the LCFS in Line with State Goals  
Comment:

Dear California Air Resources Board,

I am writing to point out what a lost opportunity it would be to adopt the proposed amendments to California's Low Carbon Fuel Standard, thereby continuing to subsidize the use of combustion fuels when the public is calling for zero-emission transportation systems and the earth is crying out for an end to carbon pollution.

Historically, every year, California has spent 80% of the Low Carbon Fuel Standard's three- to four-billion dollars on combustion technology. This money should be spent, instead, on non-combustion technologies, to speed the state's transition to a zero-emissions future.

California cannot meet its clean air and climate goals without bringing the Low Carbon Fuel Standard's several billion-dollar program in line with those goals.

I trust, therefore, that you will reject the proposed amendments and overhaul the program accordingly.

Thank you for your serious consideration of my comments.

Sincerely,  
Mary Ames  
30657 Sky Terrace Dr Temecula, CA 92592-3257

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-17 20:58:29

No Duplicates.

**Comment 7 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 45 Day.**

First Name: paula  
Last Name: levine  
Email Address: paula-levine@sbcglobal.net  
Affiliation:

Subject: Low Carbon Fuel Standard is the goal and a necessity  
Comment:

Dear California Air Resources Board,

I am a high risk asthmatic. This means that I read the quality of the air daily, several times a day, in some circumstances, to determine the quality of the air in order to plan whether I am able to exercise outside that day .

I am not alone. There are many like me in this city, country, world.

You have a role and responsibilities to further proposals that could impact me and the millions of others who have compromised breathing because of air quality. Subsiding and supporting combustible fuels is not a compatible strategy that will meet these goals for clear air.

Stick with the plan. Make air quality standards the priority at any and all turns.

Make wise and ecological decisions and stop wavering and thinking that it is something that can be negotiated. Breathing is not a negotiable issue.

Sincerely,  
paula levine  
SUSSEX St San Francisco, CA 94131

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-18 00:09:20

No Duplicates.

## **Comment 8 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Yasser  
Last Name: Jaber  
Email Address: seagatesd@yahoo.com  
Affiliation: Seagate Produce, Inc.

Subject: Proposed changes to LCFS  
Comment:

Please stop making it harder and harder to operate a business in California. Every year there is a new fee or in the case here, additional costs and less credits for doing the right things (e.g. operating electric equipment at my facility).

I am opposed to reduction in number of credits generated by e-forklifts for the reasons below:

- Unlike other EVs, most forklifts do not have energy measurement devices, making this an additional expense in hardware as well as resources to implement
- The reduction of credit generation will make it difficult to finance implementation the required metering.
- I Recommend leaving the current credit generation or evaluating ways to temper the reduction
- These changes make it more difficult for smaller operations to participate as the cost of metering cannot be split across as many forklifts as larger operations
- Implementation of metering:
  - More time needed for implementation: The time needed to evaluate appropriate solutions relative to specific fleet (e.g. charger frequencies) and operating conditions (i.e. cold storage) and cost-effectiveness relative to estimated revenue.
  - If more time is not allowed, there may be months or up to a year that we are not able to participate in this program, which is a dramatic change rather than the more typical phased-in approach used by CARB to avoid volatile impacts on businesses.
- Recommend extending estimation method for several quarters to give industry opportunity to adapt.

Regards,  
Yasser Jaber  
Vice-President  
Seagate Produce, Inc.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-18 14:33:41

No Duplicates.

**Comment 9 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 45 Day.**

First Name: Steven  
Last Name: Schroeder  
Email Address: stevenschroeder@att.net  
Affiliation:

Subject: LCFS Pricing  
Comment:

What is CARB doing to support their mandates and make it financially possible for companies by increasing the price and demand for LCFS credits?

It is clear you want cleaner air, but at current LCFS pricing it does not support this initiative. Something needs to be done fast this year to improve the prices.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-20 16:11:30

No Duplicates.

## **Comment 10 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Massimo

Last Name: Fiorella

Email Address: Massimo.fiorella@hotmail.com

Affiliation:

Subject: CARB

Comment:

Dear Carb,

I encourage you to give a constant look to the California Low Carbon Fuel Standard Credit price in order to make them economic viable for long term investments in the sector.

Current price (mid January 2024) is around 65 USD/ton and it is not feasible for planning long term investments that also contribute in a better environment in California and worldwide.

In my opinion, you should make sure to regulate the sector and take actions to make sure that California Low Carbon Fuel Standard Credit price can be constantly above the 200 USD/ton threshold and possibly hit 300 USD/ton to boost investments in the sector and make California a better environment.

I really hope immediate actions to get those results and see a spike in the Credit starting from January 2024

Regards,  
Massimo Fiorella

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-21 14:33:50

No Duplicates.

## **Comment 11 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Thomas  
Last Name: MacLean  
Email Address: T.maclea@comcast.net  
Affiliation:

Subject: Transportation vs Food  
Comment:

One issue of concern has been the use of food crops for transportation fuel - specifically the use of soy beans for renewable diesel. While we love the increased use of R99 in boats, trucks and generators I was thinking back to the problems attributed to the corn ethanol industry and its impact on food corn prices.  
<https://www.farmaid.org/blog/askfarmaid/does-corn-and-ethanol-effect-my-food-prices/#:~:text=So%20ethanol%20production%20has%20led,eggs%2C%20and%20dairy%20to%20rise.>

To understand this issue I contacted Professor Aaron Smith, PhD, at the Ag Econ Department at the University of California, Davis. From him I learned that the soy beans produce both oil and meal, where the meal is used for animal feed - primarily chickens in the US and hogs in China. Historically on the commodity market the prices of oil and meal moved together depending on the crop supply each year; however a few years ago the prices unlinked because of the demand for the oil increased more than the demand for soy meal. Today while oil makes up 20% of the weight it provides 40% of the value for a crop of soy beans.

Going forward, in reaction to the higher demand and higher price of oil we would expect to see more soy beans planted. This will also increase the supply of soy meal, without a corresponding increase in demand. The net result could be lower prices for soy meal that goes to feed chickens in the US.

Contrary to the problems caused by ethanol, the move to soy-based renewable diesel could also benefit farmers who buy soy meal for feed.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-26 09:38:29

No Duplicates.

**Comment 12 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Doug

Last Name: Sommer

Email Address: doug.sommer@ekaellc.com

Affiliation: East Kansas Agri-Energy, LLC

Subject: CARB Amendment Comments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/4406-lcfs2024-UWMHxvVzABNwMy.pdf'

Original File Name: 20240130084123313.pdf

Date and Time Comment Was Submitted: 2024-01-30 06:28:00

No Duplicates.



**Comment 13 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Kari

Last Name: Buttenhoff

Email Address: danderson@christiansoncpa.com

Affiliation: Christianson CPA

Subject: Christianson PLLP Comments re: LCFS 2024 proposed amendments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/4437-lcfs2024-WjldMwNwVW9SJwRw.pdf'

Original File Name: Christianson PLLP public comments, LCFS 2024.pdf

Date and Time Comment Was Submitted: 2024-01-30 11:31:37

No Duplicates.

**Comment 14 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Nasser

Last Name: Kutkut

Email Address: [nkutkut@smartchargetech.com](mailto:nkutkut@smartchargetech.com)

Affiliation: Smart Charging Technologies LLC

Subject: Comments on Forklift Truck Proposed EER Reduction

Comment:

Please see attached

Attachment: '[www.arb.ca.gov/lists/com-attach/4441-lcfs2024-VTITNgdgUnJXDgcq.pdf](http://www.arb.ca.gov/lists/com-attach/4441-lcfs2024-VTITNgdgUnJXDgcq.pdf)'

Original File Name: LCFS - Comment - Nasser Kutkut.pdf

Date and Time Comment Was Submitted: 2024-01-30 12:47:07

No Duplicates.

**Comment 15 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Khalid

Last Name: Rustom

Email Address: krustom@verdant-es.com

Affiliation:

Subject: Comments on proposed CI Targets and the ratcheting mechanism

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/4513-lcfs2024-UiQCYVMhVVkCaAht.pdf](http://www.arb.ca.gov/lists/com-attach/4513-lcfs2024-UiQCYVMhVVkCaAht.pdf)'

Original File Name: VES Letter to CARB - Ratchetting Mechanism.pdf

Date and Time Comment Was Submitted: 2024-01-31 07:34:49

No Duplicates.

## **Comment 16 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Nasser

Last Name: Mohsin

Email Address: nmohsin@islaverdecapital.com

Affiliation:

Subject: LCFS Regulation Feedback

Comment:

The New LCFS Regulation was supposed to inspire the achievement of stronger target reductions; it has done the opposite. Prices are currently 55 USD/MT; many technologies at these prices cannot be funded. The market has reacted poorly to the AAM and step-down.

The approach ARB seems to have taken is allowing the legislation to tighten if prices are too weak. However, the problem with this is the time it takes for the results of tightening to manifest and market dynamics in between (many models predict we are going to have very low prices for the next few years, and most models lose their accuracy the farther out they try to predict because of changing market dynamics; one example is the underestimation of renewable diesel adoption).

An alternative approach is to start with very tight policies and give ARB the option of loosening the legislation. this would look like "We are triggering AAM twice today, but reserve the right to use an Auto-Deceleration mechanism starting in 2028" for example.

Lastly, another recommended mechanism that can be employed is an "ARB LCFS containment fund", this fund will have the power to buy credits in the market when prices are low, and sell them when prices are high. There would be a few other hurdles to work through, but a fund like that would surely allow market prices to converge faster, and would also help California reach its goals.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-01-31 08:25:32

No Duplicates.

**Comment 17 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Bob

Last Name: Istwan

Email Address: bistwan@motivecompanies.com

Affiliation: The Motive Companies

Subject: CARB Proposed 2024 LCFS Amendments

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/4641-lcfs2024-BWhUOwd1Aw9SOFI3.pdf](http://www.arb.ca.gov/lists/com-attach/4641-lcfs2024-BWhUOwd1Aw9SOFI3.pdf)'

Original File Name: MIS Letter to CARB - LCFS Credit Price & Ratcheting Mechanism.pdf

Date and Time Comment Was Submitted: 2024-02-01 09:00:58

No Duplicates.

**Comment 18 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Chris  
Last Name: Stowe  
Email Address: cstowe@canarybiofuels.com  
Affiliation: Canary Biofuels

Subject: Comments to Notice of Public Hearing to Consider Proposed Low Carbon Fuel  
Standard Amendme

Comment:

Please see attached

Attachment: 'www.arb.ca.gov/lists/com-attach/4647-lcfs2024-WyfTIANgV2hRPgBj.pdf'

Original File Name: Public Comment - Canary Renewables - lcfs2024.pdf

Date and Time Comment Was Submitted: 2024-02-01 10:01:18

No Duplicates.

**Comment 19 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: AARON  
Last Name: BINKLEY  
Email Address: agbinkley@gmail.com  
Affiliation:

Subject: Cap vegetable oil-based fuels eligible for the LCFS  
Comment:

I encourage the Board to include a strong cap on vegetable oil-based fuels eligible for the LCFS to help strengthen and stabilize California's LCFS. This should be done in conjunction with and in addition to proposed chain of custody tracking requirements for virgin vegetable-based oils. This will have the added benefit of combatting greenwashing claims due to the climate and land use impacts from rapidly increasing use of vegetable-based oil feedstocks.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-01 16:01:38

No Duplicates.

## **Comment 20 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Mike  
Last Name: Noland  
Email Address: quincoinc@yahoo.com  
Affiliation:

Subject: Proposed reduction of credits for forklifts  
Comment:

Dear CARB,  
We are very concerned about your proposed changes to the LCFS Program.  
We oppose the proposed reduction in credits generated by e-forklifts. Unlike other EV's, our forklifts do not have energy measurement devices. We would be faced with the additional expense of purchase and installation of such devices.  
LCFS Credit reduction will make it more difficult for our small family-owned business to purchase and install meters to continue to participate in this program. We are not as capable of installing measurement devices as other large companies nor do we have the number of forklifts over which to spread the costs of such devices.  
Our rural location leads to additional risk in the implementation of metering due to issues with internet connectivity.  
If one or both of these proposed changes must be implemented, please allow us a minimum of 2 years before adoption. This time will allow us to evaluate and install the necessary equipment.  
Please maintain the current level of credits and do not impose metering requirements so that operations like ours can continue to phase out the use of internal combustion forklifts and adopt the use of electric units.  
Thank you,  
Mike Noland

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-03 14:37:36

No Duplicates.



## **Comment 21 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Victor  
Last Name: Reyes  
Email Address: Victor@vica.com  
Affiliation: Valley Industry and Commerce Association

Subject: SUBJECT: California Air Resources Board (CARB): Low Carbon Fuel Standards: Elimination of  
Comment:

February 5, 2024

California Air Resources Board  
1001 Street  
Sacramento, CA, 95814

SUBJECT: California Air Resources Board (CARB): Low Carbon Fuel Standards: Elimination of Intrastate Fossil Jet Fuel Exemption - OPPOSE

Dear Members of the California Air Resources Board,

The Valley Industry & Commerce Association (VICA) asserts its opposition to the proposed elimination of the Low Carbon Fuel Standard (LCFS) exemption for intrastate fossil jet fuel. We firmly believe that the current proposal, if implemented, would fall short of achieving its intended goal to increase Sustainable Aviation Fuel (SAF) production and mitigating greenhouse gas emissions, while inevitably leading to significant economic burdens on the aviation industry, travelers, and consumers.

VICA recognizes the aviation industry's commitment to voluntarily using cleaner alternatives in aviation fuel, as exemplified by the production of over 11.6 million gallons of Alternative Jet Fuel in 2022, working in alignment with California's environmental objectives to reduce greenhouse gas emissions. However, VICA contends that the proposed CARB regulation faces critical challenges to its feasibility that would, ultimately, undermine its core objective of enhancing SAF and Alternative Jet Fuel (AJF) utilization.

A core issue is the limits on AJF or SAF production. While SAF is being developed and provided, the technological landscape currently would not align with CARB's stringent requirements, as there is currently a shortage of producers capable of meeting the demand for AJF and SAF. Technological limitations would also impede the industry's ability to scale up AJF and SAF production to meet proposed standards; therefore, imposing such regulations would be premature, undoubtedly harming the industry and leading to adverse consequences for the broader economy.

The anticipated escalation of costs for the aviation industry resulting from this CARB ruling would not only impact aviation

providers, but also directly affect travelers in the form of substantial airfare and fee hikes. These economic burdens would impede the movement of travelers while increasing the cost for the shipment of goods and products, resulting in increased costs for individuals, families, and businesses.

Considering these substantial concerns, VICA strongly urges CARB to reconsider the proposed LCFS exemption elimination and instead focus on a collaborative approach with the aviation community that allows for necessary technological advancements and infrastructure development before stringent regulations are considered. This approach would ensure a seamless transition to cleaner aviation fuels without compromising our economic stability.

For these reasons, we staunchly oppose the proposed ruling.

Sincerely,

Stuart Waldman  
VICA President

Attachment: 'www.arb.ca.gov/lists/com-attach/5006-lcfs2024-AWJdOgNwUmMGXwlv.docx'

Original File Name: CARB Fossil Fuel Exemption.docx

Date and Time Comment Was Submitted: 2024-02-05 10:42:26

No Duplicates.

**Comment 22 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Adrian

Last Name: M.

Email Address: [amartinez@earthjustice.org](mailto:amartinez@earthjustice.org)

Affiliation:

Subject: LCFS

Comment:

Please find the attached comment to the Board regarding the process for the LCFS. Earthjustice will be filing comments on the substance of the proposal by the comment deadline.

All the best,  
Adrian

Attachment: '[www.arb.ca.gov/lists/com-attach/5029-lcfs2024-UzEAaQZmBCVRMwFe.pdf](http://www.arb.ca.gov/lists/com-attach/5029-lcfs2024-UzEAaQZmBCVRMwFe.pdf)'

Original File Name: Board LCFS Letter 2-5-2024 Final.pdf

Date and Time Comment Was Submitted: 2024-02-05 15:39:01

No Duplicates.

**Comment 23 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Brian  
Last Name: Kletscher  
Email Address: brian.kletscher@highwaterethanol.com  
Affiliation:

Subject: Comments to the Board LCFS2024  
Comment:

Please find attached comments from Highwater Ethanol, LLC.  
thank you!  
Brian Kletscher, CEO  
Highwater Ethanol, LLC

Attachment: 'www.arb.ca.gov/lists/com-attach/5091-lcfs2024-AmpQPwBmVW4HdlMy.pdf'

Original File Name: Highwater Ethanol Comments California Air Resources Board 2-6-2024.pdf

Date and Time Comment Was Submitted: 2024-02-06 08:12:07

No Duplicates.

## **Comment 24 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Jesse  
Last Name: Holman  
Email Address: seneryoilag@gmail.com  
Affiliation: Senery, LLC

Subject: Consider Innovative Production Method Lowers CI >60%  
Comment:

We kindly request consideration of adding to CCR Section 95489(c)(1)(A), Chemistry Replace Steam, as an innovative production method. This will incentive crude producers to stop using steam to extract heavy oil, reducing emissions in California's most disadvantaged communities while reducing overall fossil fuel demand.

Approving this incentive could reduce oil extraction emissions millions tons of CO<sub>2</sub>e, eliminating 1 billion mcf of natural gas burned by 2035. Reducing the dirtiest oil's carbon intensity over 60%. California producers will deliver the cleanest crude to California refineries, reducing emissions, imports, costly refinery upgrades all while supporting a cleaner transition.

The chemistry proposed is plant based, pH neutral and biodegradable. This is safer, cleaner and more expensive than steam. Which is why approval of this innovation is necessary to accomplish the mission of CCR Section 95489. All approved innovations in 95489(c)(1)(A) are aimed at reducing, replacing or eliminating burning natural gas, either for steam or electricity. Approved innovations are reducing around 55,000 tons CO<sub>2</sub>e per year.

Approving this innovation reduce millions of tons within the first two years.

This chemistry has so many other applications than just oil and gas. The biggest opportunities in O&G are the dirtiest production methods, which is steam in California and Canada. Next would be heavier oils from Alaska North Slope.

This chemistry outside O&G is an all-natural firefighting suppression innovation, lower emissions in agriculture, water treatment, enhanced oil recovery, eliminating solvents and harmful cleaning products, soil remediation, and the opportunities keep growing.

Attached is how chemistry replaces steam, and an application for approval. The chemistry proposed is plant based, pH neutral and biodegradable, that is 13x lower carbon intensity than steaming.

Thank you for your consideration for creating California's clean transition.

Attachment: 'www.arb.ca.gov/lists/com-attach/5106-lcfs2024-USIBY10yAzUDd1A3.pdf'

Original File Name: SenergyCARBApplicationChemistryReplaceSteam.pdf

Date and Time Comment Was Submitted: 2024-02-06 12:36:37

No Duplicates.

**Comment 25 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Amy  
Last Name: Halpern-Laff  
Email Address: amyhlaff@gmail.com  
Affiliation:

Subject: factory farm gas  
Comment:

Please stop incentivizing factory farm gas and anaerobic digesters.  
CAFOs are filthy, cruel, and exploitative of humans and animals.  
Rather than provide an additional revenue stream, we should be  
disincentivizing CAFOs.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 05:40:41

No Duplicates.

**Comment 26 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Tim

Last Name: Wenger

Email Address: tdwenger1@yahoo.com

Affiliation:

Subject: Enact Low Carbon Fuel Standard

Comment:

Writing to encourage the enactment of the low carbon fuel standard in California. The state's policies impact the largest economy in the nation and one of the largest in the world, and these policies frequently spill over to other states - California should be leader in holding factory farms, already bastions of cruelty, to account for their emissions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 06:32:28

No Duplicates.



**Comment 27 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Tom

Last Name: Progar

Email Address: justfarmingsystem@gmail.com

Affiliation:

Subject: CAFO Manure Biogas

Comment:

Please remove CAFO (factory farm) manure biogas from the clean fuel standard. This "avoided methane credit" is expanding destructive factory farming throughout the country. Rural communities, small farmers, farm animals, and the environment all suffer because of this horrible greenwashing scheme.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 06:52:40

No Duplicates.

## **Comment 28 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Julia

Last Name: Lowe

Email Address: J\_lowe66@yahoo.com

Affiliation: Sierra Club Winding Waters Group

Subject: End the current LCFS policies that reward factory farm polluters

Comment:

Governor Newsom and administration, please understand my concern.

Factory farm gas is not clean energy. It's composed primarily of methane, a potent greenhouse gas that traps 80 times more heat than carbon dioxide.

The extraction of methane from factory farm waste does nothing to alleviate the massive harm inflicted by factory farms on local communities. The production of methane from factory farms causes public health and climate impacts, compounding the existing impacts from factory farms.

The LCFS is a California policy, but it is driving the expansion of factory farms and factory farm gas in numerous states, including MY state. Last Friday I attended an all day Ag Bioscience Conference that was sponsored by Duke Energy. The only type of Climate solution discussed was Agrivoltaics, of which I approve and encourage farmers to include in the long-term plans for their land. Solar farms on Ag land make a lot of sense, not burning and producing more Methane that our atmosphere already cannot take. What kind of technology is? This is a set back to our survival, it is a FALSE CLIMATE SOLUTION and it should be stopped. Please do nothing to incentivize polluting factory farms. We have enough of them in Indiana and I don't want any more. Turn to cleaner energy technology now. Thank you, Julie Lowe, Columbus, Indiana

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 08:20:12

No Duplicates.

**Comment 29 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Robert

Last Name: Rhodes

Email Address: sycamorespringsfarms@earthlink.net

Affiliation: Wilderness Society

Subject: Factory Farms

Comment:

Stop permitting FACTORY FARMS. Your environmental laws are a  
joke!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 08:46:12

No Duplicates.

**Comment 30 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Susan

Last Name: Frye

Email Address: susanjanefrye@gmail.com

Affiliation:

Subject: Animal factories

Comment:

Please stop activity that promotes destructive and polluting CAFOs.  
Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 09:40:44

No Duplicates.

## **Comment 31 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Everett  
Last Name: Murphy M.D.  
Email Address: coemurphy@hotmail.com  
Affiliation: Pulmonologist

Subject: California's Low Carbon Fuel Standard  
Comment:

Dear Governor Newsom and Members of the California Air Resources Board (CARB),

I am writing to you personally to express deep concern about the current state of California's Low Carbon Fuel Standard (LCFS) and to implore you to take immediate action to address the environmental injustices embedded in the program.

Originally intended as a tool to combat climate pollution in the transportation sector, the LCFS has been manipulated by powerful corporations, particularly Big Ag and Big Oil. It has become the nation's largest and most lucrative pollution trading scheme for factory farm biogas, perpetuating harmful practices rather than serving its environmental objectives. It is driving the construction of more factory farms and factory farm biogas projects in states far from California, causing severe harm to air, water, public health, rural economies, and overall quality of life.

The current flaws in the LCFS, such as "avoided methane crediting" and inaccurate life cycle assessments, not only enable pollution but disproportionately harm low-income communities and communities of color. Factory farms, predominantly situated in these marginalized areas, inflict severe damage on air, water, public health, rural economies, and overall quality of life.

I urge you to consider and prioritize the following reforms to the LCFS:

Eliminate "avoided methane crediting" in 2024.  
Address inaccuracies in the Life Cycle Assessment that ignore associated up and downstream greenhouse gas emissions from factory farm gas production.  
Remove the 10-year "grace period" for factory farm gas producers.  
Stop double counting by allowing factory farm gas projects paid for and claimed by other programs to sell LCFS credits as well.  
CARB holds a pivotal opportunity this year to adopt new rules that align the LCFS with California's environmental justice commitments. Environmental justice, zero emission, and climate advocates have presented a clear alternative to the current policies that heap lavish rewards on the biggest polluters through the Comprehensive EJ Scenario. CARB should adopt those recommendations to stop moving California climate policy in the wrong direction.

I implore you to lead the charge in demanding a future free from the clutches of Big Oil and Big Ag. By prioritizing the well-being

of Californians over corporate profits, we can reform the LCFS to protect communities most affected by its current flaws. Your decisive action in this critical matter would demonstrate a commitment to bold climate action rooted in justice. Please stop exporting your bad policy to our front doors.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 10:33:30

7 Duplicates.

## **Comment 32 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Ginny  
Last Name: Masullo  
Email Address: masullo.ginny1@gmail.com  
Affiliation: Retired

Subject: LCFS  
Comment:

Dear Governor Newsom and Members of the California Air Resources Board (CARB),

I have concerns regarding California's Low Carbon Fuel Standard (LCFS) and to implore you to take immediate action to address the environmental injustices embedded in the program.

LCFS has become the nation's largest and most lucrative pollution trading scheme for factory farm biogas, perpetuating harmful practices rather than serving its environmental objectives. It is driving the construction of more factory farms and factory farm biogas projects in states far from California, causing severe harm to air, water, public health, rural economies, and overall quality of life. Incentives for more factory farms is not a solution for combatting climate pollution by factory farms.

I urge you to consider and prioritize the following reforms to the LCFS:

Eliminate "avoided methane crediting" in 2024.  
Address inaccuracies in the Life Cycle Assessment that ignore associated up and downstream greenhouse gas emissions from factory farm gas production.  
Remove the 10-year "grace period" for factory farm gas producers.  
Stop double counting by allowing factory farm gas projects paid for and claimed by other programs to sell LCFS credits as well.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 14:02:25

No Duplicates.

**Comment 33 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Christine

Last Name: Reid

Email Address: creid0913@gmail.com

Affiliation:

Subject: CAFO biogas

Comment:

Incentivizing digesters to remove methane from manure with very lucrative credits is backfiring. It has spawned a Ponzi scheme for investors in digesters to benefit financially on the overproduction of manure. Stop it please.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 14:45:16

No Duplicates.



## **Comment 34 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Mark  
Last Name: Smith  
Email Address: morgsat1@gmail.com  
Affiliation:

Subject: New rules for CARB  
Comment:

California is exporting its dirty energy policy to rural communities throughout the U.S. without regard for the local impacts. The existing LCFS rules perpetuate environmental injustice by disproportionately harming low-income communities and communities of color.

Factory farms, predominantly located in these marginalized areas, cause severe harm to our air, water, public health, rural economies, and overall quality of life.

This year, the California Air Resources Board (CARB) has the chance to adopt new rules that would realign the LCFS with California's environmental justice commitments and stop rewarding factory farms for their pollution.

CARB's Environmental Justice Advisory Committee presented a clear alternative to the dirty status quo, and submitted a resolution calling for an end to the current LCFS policies that reward factory farm polluters.

Please do the right and sustainable thing. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 17:56:47

No Duplicates.

## **Comment 35 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Elizabeth  
Last Name: York  
Email Address: lizpaintsnyc@gmail.com  
Affiliation:

Subject: LCFS Laws  
Comment:

PLEASE make reforms to the LCFS:

Eliminate "avoided methane crediting" in 2024.

Address inaccuracies in the Life Cycle Assessment that ignore associated up and downstream greenhouse gas emissions from factory farm gas production.

Remove the 10-year "grace period" for factory farm gas producers.

Stop double counting by allowing factory farm gas projects paid for and claimed by other programs to sell LCFS credits as well.

Thank you for making changes that help the planet and farming communities, not big Ag.

Sincerely,  
Elizabeth York

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-08 23:07:31

No Duplicates.

**Comment 36 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Teri  
Last Name: Klitzke  
Email Address: [teri.klitzke@purefield.com](mailto:teri.klitzke@purefield.com)  
Affiliation: PureField Ingredients LLC

Subject: Mandatory firm rotation for VBs and less intensive verification  
Comment:

Please see attached comments.

Attachment: '[www.arb.ca.gov/lists/com-attach/5394-lcfs2024-WytWJQd0UmQCYgBp.pdf](http://www.arb.ca.gov/lists/com-attach/5394-lcfs2024-WytWJQd0UmQCYgBp.pdf)'

Original File Name: PureField Ingredients LLC-comments-to-CARBs-proposed-LCFS-amendments.pdf

Date and Time Comment Was Submitted: 2024-02-09 11:14:36

No Duplicates.

## **Comment 37 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Robert

Last Name: Sijgers

Email Address: robsijgers@gmail.com

Affiliation:

Subject: Stop incentivizing factory farm gas.

Comment:

- \* Stop awarding the biggest polluters!
- \* Stop increased GHG emissions as a result of factory farming.
- \* Dairy manure contributes to about a third of the nitrate polluting groundwater in the Central Valley and has polluted in many areas 30-40% of private wells.
- \* It takes about 2 agricultural acres per head of cattle to sustain just feeding them, which is then not available for feeding people. Incentivizing factory farms makes this worse. Biogas digester promotion aggravates the problem and dairy herds become just the first stage of an industrial money-making scheme that is already severely impacting our public health and our environment.
- \* CARB disregards violations of out-of-state rules and regulations.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-10 06:42:28

No Duplicates.

**Comment 38 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Reuben

Last Name: Franco

Email Address: aobeid@ochcc.com

Affiliation:

Subject: Opposition to California Air Resources Board Proposal to Regulate Jet Fuel

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/5769-lcfs2024-UD9WIFQ1Aj5VIAIlg.pdf](http://www.arb.ca.gov/lists/com-attach/5769-lcfs2024-UD9WIFQ1Aj5VIAIlg.pdf)'

Original File Name: Opposition to CA Air Resources Board Proposal.pdf

Date and Time Comment Was Submitted: 2024-02-12 14:22:38

No Duplicates.

**Comment 39 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Josh  
Last Name: Thome  
Email Address: jthome@us-energy.com  
Affiliation: U.S. Venture, Inc.

Subject: U.S. Venture Comments on CA-GREET 4.0  
Comment:

Please see the attached commentary provided by U.S. Energy, a U.S. Venture company, on the default electricity emission factors derived from the CA-GREET 4.0 model.

Thank you,

Josh Thome  
Manager of Environmental Analytics  
U.S. Energy, a U.S. Venture company

Attachment: 'www.arb.ca.gov/lists/com-attach/5775-lcfs2024-VCEFLVYkVCIVDAh+.pdf'

Original File Name: U.S. Venture Comments on CA-GREET 4.0.pdf

Date and Time Comment Was Submitted: 2024-02-12 15:52:11

No Duplicates.

**Comment 40 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Amy

Last Name: Hofmeister

Email Address: ahofmeister@glaciallakesenergy.com

Affiliation: Glacial Lakes Energy LLC

Subject: Proposed LCFS Amendments Comments

Comment:

Please see my full comments in the uploaded file.

Attachment: 'www.arb.ca.gov/lists/com-attach/5824-lcfs2024-WzgBZgd0WWhWDwJu.pdf'

Original File Name: CARB LCFS Amendments comments.pdf

Date and Time Comment Was Submitted: 2024-02-13 07:47:08

No Duplicates.

## **Comment 41 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Susan

Last Name: Gibson

Email Address: Onesuegibson@protonmail.com

Affiliation:

Subject: California's Low Carbon Fuel Standard

Comment:

Including factory farm gas in California's Low Carbon Fuel Standard would:

- > Incentivize more corporate factory farms, harming family farmers, rural communities, and our environment.
- > Create more corporate consolidation in the U.S. livestock industry.
- > Commoditize methane production, which would fuel more methane producing practices.
- > Create additional overproduction of commodities, pork and milk, increasing supply and further pushing down market prices paid to independent family farms.
- > Pay foreign multinational meatpackers, like Chinese-owned Smithfield and Brazilian-owned JBS, for their pollution.
- > Create incentives for the public (taxpayer dollars through government subsidies) to fund anaerobic digesters to capture factory farm gas.

Please don't do it!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-14 09:27:52

9 Duplicates.



## **Comment 42 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Karen

Last Name: Meyer

Email Address: kb2bird@sbcglobal.net

Affiliation:

Subject: Factory Farm Gas in California's Fuel Standards

Comment:

Dear Board Members,

I'm against including factory farm gas in California's Low Carbon Fuel Standard. This will not be a positive solution for our climate crisis. One of the main reasons to nix factory farm gas from the standard is that it will encourage more large factory farms, making it harder for small family farms to prosper while these corporate farms push down market prices with overproduction. More issues with this bill include the fact that multinational large meatpackers will be paid for their pollution, and the bill will create incentives via government subsidies to support anaerobic digesters for factory farm gas.

This would add more factory farms which will lead to more methane, more water and air pollution, more corporate consolidation. I'm in the Midwest and know this will not lead to less carbon release in our atmosphere. Please strike this portion of the amendments.

Thank you for allowing comments.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-14 09:52:05

No Duplicates.

**Comment 43 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Ron  
Last Name: Yarger  
Email Address: ronyarger@live.com  
Affiliation:

Subject: Biofuel  
Comment:

I am adamantly opposed to these and any support for them.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-14 10:02:22

No Duplicates.

**Comment 44 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Margaret  
Last Name: Eaton  
Email Address: Mebwire@gmail.com  
Affiliation:

Subject: California Bio Gas Bad Idea  
Comment:

Please do not allow the CA Air Resources Board to allow corporate  
factory farms across the country to sell methane to this misguided  
system- which is not a solution to our country's air pollution  
problem. We must stop allowing big corporate farms to create this  
hazardous gas in the first place.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-14 10:42:45

No Duplicates.

**Comment 45 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: susan

Last Name: austin

Email Address: susancataustin@gmail.com

Affiliation:

Subject: California low carbon fuel standard

Comment:

Please do not include factory farm gas in the new California Low Carbon Fuel standard. Doing so is harmful to the environment by encouraging more factory farms. These are polluting to our land, water and air quality resources. Corporate out of state and in many cases out of country businesses will profit from this change. Thank you for not including factory farms in your efforts to lower carbon emissions

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-14 13:13:25

No Duplicates.

**Comment 46 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Anthony  
Last Name: Trujillo  
Email Address: ate2001@sbcglobal.net  
Affiliation:

Subject: CARB  
Comment:

CARB lies about the efficiency of EVs!! In their ARB/MSD/7-6-94 they claim that battery efficiency is 80% and motor is 90%. These are LIES!!!! Charging a battery in one hour has an efficiency of 5.88%, in 15 minutes ONLY 0.3675%!! The motor efficiency depends on how many stops are made. Each time the motor starts the motor and system efficiency are almost ZERO!!!! Every time the motor starts the battery efficiency is also degraded because of the high motor starting current!!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-14 22:14:21

No Duplicates.

**Comment 47 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Nancy

Last Name: Ames

Email Address: njoames@gmail.com

Affiliation:

Subject: LCFS2024

Comment:

This is a bad plan. Corporate livestock operations are massive polluters of air, water, and land. I do not want to incentivise these businesses or attract them to rural Missouri. They are a huge cost to the communities located near them, and massively destructive for wildlife. Vote NO

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-14 23:13:23

No Duplicates.

**Comment 48 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Ben  
Last Name: Lilliston  
Email Address: blilliston@iatp.org  
Affiliation: Institute for Agriculture and Trade Poli

Subject: IATP Comment on LCFS2024  
Comment:

The Institute for Agriculture and Trade Policy submits the attached comment to CARB on the Low Carbon Fuel Standard's proposed amendments. Thank you for considering these comments as CARB moves forward on reforms.

Attachment: 'www.arb.ca.gov/lists/com-attach/6116-lcfs2024-WzgGYVMgVGVWDwZl.pdf'

Original File Name: CARB comment on LCFS from IATP.pdf

Date and Time Comment Was Submitted: 2024-02-15 09:04:17

No Duplicates.

**Comment 49 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Margaret

Last Name: Laub

Email Address: margaret.laub@anaergia.com

Affiliation: Anaergia

Subject: Comments on Proposed LCFS Program Changes

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6120-lcfs2024-UTAGbgNjVGJWIgNk.pdf'

Original File Name: Anaergia CARB LCFS Comments - 20240220.pdf

Date and Time Comment Was Submitted: 2024-02-15 09:31:12

No Duplicates.



**Comment 50 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Sherry  
Last Name: M Kerr  
Email Address: sherrykerr@live.com  
Affiliation:

Subject: large corporate farms  
Comment:

I am truly concerned about having more huge corporate farms moving into our state. (Missouri). And, paying them for the methane they produce would invite MORE to come to our state. They are often owned by out of country people from China and other places that do not have our best interests at heart. They raise animals in crowded, unhealthy, unnatural, conditions that are not humane..... They are harmful to our water supply and harmful to the environment..... Seems we can do a better job of raising animals on a smaller, more natural basis.....and more humane.

Respectfully,  
Sherry Kerr

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-15 09:55:33

No Duplicates.

**Comment 51 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Claire  
Last Name: Foster  
Email Address: [claire.foster@fidelisinfra.com](mailto:claire.foster@fidelisinfra.com)  
Affiliation:

Subject: Fidelis New Energy's Comment Letter Submission  
Comment:

Good afternoon,

On behalf of Fidelis New Energy, LLC, please see attached the company's comment letter in response to the proposed amendments for CARB's LCFS legislation. We applaud CARB's continued efforts to improve the LCFS program and maintain California's position at the forefront of climate positive legislation.

Respectfully submitted,

Fidelis New Energy, LLC

Attachment: '[www.arb.ca.gov/lists/com-attach/6136-lcfs2024-B2tSN1M0U3MAWQZ2.pdf](http://www.arb.ca.gov/lists/com-attach/6136-lcfs2024-B2tSN1M0U3MAWQZ2.pdf)'

Original File Name: LCFS Program Proposed Amendments Letter for Submission.pdf

Date and Time Comment Was Submitted: 2024-02-15 11:53:38

No Duplicates.

**Comment 52 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Goldie

Last Name: Potter

Email Address: Copperhead4656@gmail.com

Affiliation: Protect Pomme de Terre

Subject: Incentivizing CAFOS in the Midwest

Comment:

This is endangering the family farm and all water quality in the state of Missouri. Please stop incentivizing CAFOs by claiming their methane is a renewable resource. It is just like all the waste they want to dump in our rivers--POLLUTION. Please stop.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-15 12:46:28

No Duplicates.

**Comment 53 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Don  
Last Name: Gilstrap  
Email Address: dgilstrap@chevron.com  
Affiliation:

Subject: Chevron Comments on Intrastate Jet  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6150-lcfs2024-B2RQPgZiBCElf1U6.pdf'

Original File Name: Chevron Comments on 2024 LCFS Rulemaking (intrastate jet).pdf

Date and Time Comment Was Submitted: 2024-02-15 14:16:46

No Duplicates.

**Comment 54 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Don

Last Name: Gilstrap

Email Address: dgilstrap@chevron.com

Affiliation:

Subject: Chevron Comments on Biogas & Hydrogen

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6151-lcfs2024-VjVUOIYyVXAHcwFu.pdf'

Original File Name: Chevron Comments on 2024 LCFS Rulemaking (biogas & H2).pdf

Date and Time Comment Was Submitted: 2024-02-15 14:20:04

No Duplicates.

**Comment 55 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Dan  
Last Name: Evans  
Email Address: Dan@promusenergy.com  
Affiliation: Promus Energy

Subject: Comments on Proposed Low Carbon Fuel Standard Amendments  
Comment:

Please see attached comments.

Attachment: '[www.arb.ca.gov/lists/com-attach/6171-lcfs2024-UyMAdAFvUG5RIIh.pdf](http://www.arb.ca.gov/lists/com-attach/6171-lcfs2024-UyMAdAFvUG5RIIh.pdf)'

Original File Name: Promus Energy Comments on the Proposed Low Carbon Fuel Standard Amendments 2.15.24.pdf

Date and Time Comment Was Submitted: 2024-02-15 16:52:10

No Duplicates.

**Comment 56 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Simon  
Last Name: Brandler  
Email Address: simon@brimstone.energy  
Affiliation: Brimstone

Subject: Brimstone comments on LCFS amendments  
Comment:

Please find our comments attached. Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/6174-lcfs2024-AWNQJFI6V2kLfgN3.pdf'

Original File Name: Brimstone LCFS Letter 2.15.pdf

Date and Time Comment Was Submitted: 2024-02-15 18:16:42

No Duplicates.

## **Comment 57 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Diane

Last Name: Brost

Email Address: Dianebrost@att.net

Affiliation:

Subject: Factory Farm Gas in California's Fuel Standards

Comment:

Dear Board Members,

I'm against including factory farm gas in California's Low Carbon Fuel Standard. This will not be a positive solution for our climate

crisis. One of the main reasons to nix factory farm gas from the standard is that it will encourage more large factory farms, making

it harder for small family farms to prosper while these corporate farms push down market prices with overproduction. More issues with

this bill include the fact that multinational large meatpackers will be paid for their pollution, and the bill will create incentives via government subsidies to support anaerobic digesters for factory farm gas.

This would add more factory farms which will lead to more methane, more water and air pollution, more corporate consolidation. I'm in the Midwest and know this will not lead to less carbon release in our atmosphere. Please strike this portion of the amendments.

Thank you for allowing comments.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-15 18:51:11

No Duplicates.



**Comment 58 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: D.

Last Name: Zink

Email Address: zmail@sunintherain.com

Affiliation:

Subject: DISASTER POTENTIAL FROM BIOGAS

Comment:

There are already enough uncontrolled releases of methane from multiple major sources in multiple major countries, from unmanaged landfill gas to fracking and pipeline release. Methane is much more damaging to atmospheric protection of the planet than CO2. Concentrated manure is a preventable source, and this process is poorly captured. Pipeline losses will also apply to "biogas". In addition to environmental impacts, community planning for emergency situations is usually under-assessed and under-developed. These become gigantic explosion risks, whether or not the methane is intended to be collected.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 05:48:39

No Duplicates.

## **Comment 59 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Tansy

Last Name: Woods

Email Address: tansy.woods@yahoo.com

Affiliation:

Subject: Stop Funding Biogas

Comment:

Dear Governor Newsom and Members of the California Air Resources Board (CARB), As a California resident, I am writing to urge you to stop using taxpayer dollars to fund factory farm biogas projects, which threaten the well-being of animals, people, and the planet. Funding biogas production under the Low Carbon Fuel Standard (LCFS) incentivizes the consolidation and growth of the notoriously harmful factory farming industry. Every year, this industry forces billions of animals to suffer in unimaginably cruel conditions. It generates air, water, and methane pollution that entrench fossil fuel interests and accelerate the climate crisis. And it increases rates of high blood pressure, respiratory conditions, and waterborne illnesses for local communities. To begin addressing these substantial harms, I implore you to implement the following reforms to the LCFS: 1. Eliminate "avoided methane crediting" in 2024. 2. Address inaccuracies in the Life Cycle Assessment that ignore associated up and downstream greenhouse gas emissions from factory farm gas production. 3. Remove the 10-year "grace period" for factory farm gas producers. 4. Stop double counting by allowing factory farm gas projects paid for and claimed by other programs to sell LCFS credits as well. The future of our communities and shared environment is in your hands. Please reform LCFS to create a safer, healthier home for all Californians. Thank you for your time and consideration.

Tansy Woods

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:03:10

119 Duplicates.

**Comment 60 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: alex

Last Name: oscoy

Email Address: oscoy55@yahoo.com

Affiliation:

Subject: METHANE/BIOGASSES

Comment:

METHANE/BIOGASSES; LESS THAN IS WAY MORE THAN!  
VEGAN, A NOUN, IE. SOMEONE WHO TRULY CARES FOR PLANET EARTH AND ALL  
ON ITS INHABITANTS.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:04:24

No Duplicates.

**Comment 61 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Lorraine

Last Name: Lowry

Email Address: Lmurphy\_2006@hotmail.com

Affiliation:

Subject: Factory Farm Gas

Comment:

If we don't get this horrible pollution under control control soon,  
this planet will never recover

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:13:18

No Duplicates.

**Comment 62 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: ALIX  
Last Name: SCHREK  
Email Address: OSCOY56@YAHOO.COM  
Affiliation:

Subject: NOT SUSTAINABLE METHANE  
Comment:

California has more industrial dairies than any other state, polluting our rivers, depleting our groundwater, and emitting disastrous greenhouse gasses. Now, factory farm polluters claim they are environmentally friendly because they produce "biogas." Even worse, they are using our tax dollars to fund this harmful greenwashing.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:13:51

No Duplicates.

**Comment 63 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Heidi  
Last Name: Taylor  
Email Address: hmephd@gmail.com  
Affiliation:

Subject: FOIE GRAS PRODUCTION  
Comment:

Please stop!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:16:35

No Duplicates.

**Comment 64 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: robert  
Last Name: brixner  
Email Address: dratted@aol.com  
Affiliation:

Subject: Pure air  
Comment:

YOU said - you PROMISED - to GET SOMETHING POSITIVE DONE!  
Start LIVING UP TO IT!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:22:26

No Duplicates.

**Comment 65 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Toby  
Last Name: Malina  
Email Address: toby@elfelf.com  
Affiliation:

Subject: Level the playing field  
Comment:

Low carbon fuel standards should apply to all industries. We can't pick and choose to whom standards apply as we attempt to save our planet.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:19:52

No Duplicates.



**Comment 66 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Linda

Last Name: Bartlett

Email Address: blinkmimi@gmail.com

Affiliation:

Subject: Biogas

Comment:

Stop greenwashing by producing harmful Biogas.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:31:01

No Duplicates.

**Comment 67 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Lacey

Last Name: Levitt

Email Address: laceylevitt@gmail.com

Affiliation:

Subject: end current Low Carbon Fuel Standard (LCFS) policies that reward factory farm  
polluters

Comment:

Please end current Low Carbon Fuel Standard (LCFS) policies that  
reward factory farm polluters. Investing in biogas means investing  
in even more factory farm pollution.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:30:59

No Duplicates.

**Comment 68 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Claudia A  
Last Name: Peters  
Email Address: cloucdw@aol.com  
Affiliation:

Subject: Factory Farming  
Comment:

This is not only harmful to animals, which should be your top priority, it increases pollution and increases carbon in the air.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:39:16

No Duplicates.

**Comment 69 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Pegalee

Last Name: Benda

Email Address: riverwolf@comcast.net

Affiliation:

Subject: Rights for animals

Comment:

Gas is cruel!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:42:28

No Duplicates.

**Comment 70 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Phoenix  
Last Name: Giffen  
Email Address: phoenixgiffen@gmail.com  
Affiliation:

Subject: Protect Mother Earth!  
Comment:

There is no Planet B!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:49:17

No Duplicates.

## **Comment 71 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Emily

Last Name: Watson

Email Address: ewatson975@gmail.com

Affiliation:

Subject: Factory Farming and the allegiance to disregard

Comment:

I often wonder what kind of human has the gall, emotional paralysis, and substantial lack of compassion that they are able to bear witness to the horrendous living conditions and ultimately, barbaric death these sentient beings are subjected to.

One might argue, "they don't know any different." To that I ask, if you grew up with debilitating physical abuse in your house, would you think that was normal and you would be fine because you don't know any better?

If we are being honest with ourselves, the answer would be no.

What if our babies, as soon as they are born, are taken from us. Chained to a dog house until they are sold to be killed and we are then raped of the nutrients our body made specifically for our offspring so someone else could get money.

Money. For what? To drive a stupid fancy car? To buy a big house you eventually take for granted? To tell people you have x amount of dollars so you can make yourself feel a little better about being you?

It's trafficking at the most basic level. you have advocated for this. You have sold yourself and your basic human beliefs for paper.

Take a step back and think about what factory farming really is and then look at yourself in the mirror in a quiet room and sit with the fact that YOU have killed, abused, and neglected your fellow beings so YOU could have money. How sad of an existence is that really?

How cheap your soul is to be bought so easily and at the disregarded suffering of others. Think of your most beloved relative who as a child, you thought hung the moon. What would they think if they walked beside you everyday and watched what you did to animals.

It's a shame, really. We all used to have compassion, empathy, and respect for all those around us. I dream of a time when we get back to that. Sure, there are populations who consume meat and that is a choice we all have the right to bare. What's wrong with doing it the right way and having pride in what you contribute to the world? Where has the pride gone?

End factory farming. It's what's good for all of us and something we collectively can be so proud to be a part of.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:33:08

No Duplicates.

## **Comment 72 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: LAURIE

Last Name: Pueschel

Email Address: bluewingedbreath@gmail.com

Affiliation:

Subject: Get Rid of Factory Farms and all the extras that come with it

Comment:

Factory farming is the one of the biggest atrocities of modern day living.

We vegans. vegetarians have proven meat is not a necessity at all in the human diet. STOP playing around with regulations that pretend to show you care about the environment. Humans are as much as animals a connecting power to the environment. We are not seperate but a part or partner to it. I have a sort of PTSD from watching a few slaughterhouse videos to help keep me on my track of meatless diet and compassion for our fellow sweet animals like the cows, sheep, goats, pigs, ducks, turkeys, and chickens etc. Man is in a state of CONFUSION in the walls of confinement of buildings, roads, etc. Only an old time native American Indian can tell you what it feels like to know the spiritual tie to the land they were so proudly apart of. Simple living was a direct connection to truth at all times and to all places in time. They could feel the energy from the earth entering their being as some of us awakened can now too. Their intuition was outstanding and their ability to communicate with ancestors.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 08:53:31

No Duplicates.



## **Comment 73 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: David

Last Name: Jallo

Email Address: Dgjallo@yahoo.com

Affiliation:

Subject: Stop Support For Dairy Farm Biogas Greenwashing

Comment:

I want to express my opposition to the dairy industry receiving support for its biogas production. These incentives support an industry built on pollution and cruelty. It's a classic example of greenwashing and does not benefit the environment. Biogas capture is inefficient, costly and does not mitigate atmospheric warming gas production. Ending dairy operations is the most effective way to stop their destructive effects. Please do not support their damaging activities.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 09:00:03

No Duplicates.

**Comment 74 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Donovan

Last Name: Prahl

Email Address: donovan.p@bushmillsethanol.com

Affiliation:

Subject: Public Comment for Proposed Low Carbon Fuel Standard  
Comment:

Public Comment for Proposed Low Carbon Fuel Standard Amendments.  
See Attached document.

Attachment: 'www.arb.ca.gov/lists/com-attach/6277-lcfs2024-VDdQN1E8AjgEZARr.pdf'

Original File Name: California Public Comment.pdf

Date and Time Comment Was Submitted: 2024-02-16 09:07:33

No Duplicates.

## **Comment 75 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Llll  
Last Name: D  
Email Address: Msldill@yahoo.com  
Affiliation: STOP CRUELTY!!!

Subject: STOP CRUELTY!!

Comment:

California is greenwashing factory farming.

California has more industrial dairies than any other state, polluting our rivers, depleting our groundwater, and emitting disastrous greenhouse gasses. Now, factory farm polluters claim they are environmentally friendly because they produce "biogas." Even worse, they are using our tax dollars to fund this harmful greenwashing.

Tell California regulators to stop investing in factory farm gas! Click the link, add your personal information, write your message, and submit! Feel free to personalize your message so it stands out even more.

Not sure what message to send? Feel free to copy and paste our sample message linked here.

Biogas is unsustainable and unnecessary--it does not reduce the dairy industry's environmental footprint. In fact, investing in biogas helps maintain and expand factory farms. Investing in biogas means investing in even more factory farm pollution.

This year, the California Air Resources Board (CARB) has the opportunity to adopt new rules that would stop rewarding factory farms for their pollution. We have until midnight PST on February 20th to make our voices heard.

Please submit a public comment to California Governor Newsom and the California Air Resources Board (CARB) asking them to end current Low Carbon Fuel Standard (LCFS) policies that reward factory farm polluters!

Thank You &#128591;&#127997;

LD

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 09:09:30

17 Duplicates.



**Comment 76 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Cara  
Last Name: O'Neill  
Email Address: ocara2015@yahoo.com  
Affiliation:

Subject: FACTORY FARMS BIO GAS  
Comment:

I AM SOOOO DISAPPOINTED THAT CALIF THE "MOST" FACTORY FARMS ALL OF  
WHICH PRODUCE BIO GAS

IF THAT IS THE CASE WE NEED TO CHANGE IT

FACTORY FARMS ARE BARBAIUC BIO GAS IS DEADLY

CARA O'NEILL

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 09:02:59

No Duplicates.

**Comment 77 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Rich  
Last Name: Dandolo  
Email Address: rdandolo@aol.com  
Affiliation: The public

Subject: Immoral use of tax payer money.  
Comment:

Please stop using my tax payer money to fund Factory Farming expenses of any kind. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 09:08:05

No Duplicates.

**Comment 78 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Lisa

Last Name: Winningham

Email Address: lwinning1@verizon.net

Affiliation:

Subject: Biogas

Comment:

Biogas from CAFOs is neither clean nor naturally renewable. It's not a replacement for clean solar, water, wind, and geothermal energy. It does not solve the environmental degradation or the human and other animal suffering caused by factory farming. This Earth Day, we must reject biogas in favor of energy and agricultural changes that can actually build a sustainable, just future.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 09:15:31

No Duplicates.

## **Comment 79 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Jeremy  
Last Name: Mall  
Email Address: jeremymall@yahoo.com  
Affiliation:

Subject: ZEVs  
Comment:

Please refrain from using the term "ZEV" or, at the very least, refrain from blanketly including electric vehicles in your definition. The California Low Carbon Fuel Standard is a complete well to wheel GHG emission program. The California power grid is far from zero emissions (even if you exclude all the uncontrolled burn emissions from forest fires caused by downed power lines). Electricity from the California power grid is the baseline source of fuel for most electric vehicles and thus, they are not "zero emission vehicles" per the very foundations of your policy.

If CARB wishes to include some electric vehicles in this definition, it should limit the vehicles to only those using hard-wired renewable power to refuel their vehicles as per CARB guidance on the use of renewable electricity.

I have doubts that even the vehicles mentioned above should qualify as a ZEV as GHG emissions from battery production and the production of solar panels are also not "zero emission" but I will concede that one could interpret those as outside the scope for "fuel" within LCFS policy but CARB should further give guidance that the materials used to generate, store, or utilize fuel are outside the scope of the AB 32 policy.

CARB could choose to change this definition to zero tailpipe emission vehicles but it should refrain from using the "ZEV" acronym which is marketing tool for electric vehicle manufacturers and irrelevant to a well to wheel GHG emission policy. It is confusing to LCFS stakeholders and general population.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 09:18:44

No Duplicates.



**Comment 80 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Sondra  
Last Name: BUSTOS  
Email Address: sondrambustos@gmail.com  
Affiliation:

Subject: Factory farms  
Comment:

Stop investing in factory farm gas!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 09:28:53

No Duplicates.

**Comment 81 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Maura

Last Name: Lucas

Email Address: mclucus@aol.com

Affiliation:

Subject: Factory farm gas rewards

Comment:

Please stop rewarding factory farms for their pollution.  
Biogas is unsustainable and unnecessary.  
Stop investing in factory farm gas.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 09:27:00

No Duplicates.

**Comment 82 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Camila  
Last Name: Vaccari  
Email Address: camila.vaccari@fs.agr.br  
Affiliation:

Subject: Recommendations for Expanding and Enhancing Certification Processes under Low Carbon Fuel

Comment:

Dear Chair Randolph,

On behalf of FS Fueling Sustainability, we are writing to respectfully submit our recommendations for consideration by CARB, as outlined in the attached letter.

We appreciate the opportunity to contribute to the ongoing discussions and improvements in the LCFS program.

Sincerely,  
Camila Vaccari

Attachment: 'www.arb.ca.gov/lists/com-attach/6294-lcfs2024-AXJUNwBiACcFagRr.pdf'

Original File Name: Section 95488.9 Proposal\_final\_signed.pdf

Date and Time Comment Was Submitted: 2024-02-16 09:31:53

No Duplicates.

**Comment 83 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Margaret  
Last Name: Webb  
Email Address: Mikiwebb@att.net  
Affiliation:

Subject: Biogas  
Comment:

Please stop the many abuses of factory farms including biogas as  
helpful to the environment!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 09:36:21

No Duplicates.

**Comment 84 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Gloria

Last Name: Boyd

Email Address: gboyd805@charter.net

Affiliation: Mrs.

Subject: Destruction of all living things

Comment:

Stop killing our planet and our children

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 09:50:00

No Duplicates.

## **Comment 85 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Louise  
Last Name: Gray  
Email Address: louisegray1@hotmail.com  
Affiliation:

Subject: Do Not Invest In Biogas  
Comment:

California has more industrial dairies than any other state so it is polluting rivers, depleting groundwater, and emitting disastrous greenhouse gasses!!

I experienced a NATIONWIDE food recall of California vegetables due to urine and feces run off from cows, into nearby vegetable farms!

Now, factory farm polluters claim they are environmentally friendly because they produce "biogas."

Even worse, they are using tax dollars to fund this harmful greenwashing because the fact is Biogas is unsustainable and unnecessary--it does not reduce the dairy industry's environmental footprint!!

Investing in biogas means investing in even more factory farm pollution.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 09:45:22

No Duplicates.

**Comment 86 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Karen  
Last Name: Neumeier  
Email Address: k.neumeier@comcast.net  
Affiliation:

Subject: Funding for factory farms  
Comment:

Stop these horrible travesties to animals...despicable treatment

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 09:57:30

No Duplicates.

**Comment 87 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Geralyn

Last Name: Gulseth

Email Address: gpirategirl@yahoo.com

Affiliation:

Subject: Comment on low carbon fuel standard

Comment:

Please adopt rules that do not reward pollution producing factory farms. We need to take reasonable steps to fight climate change now. Please end policies that encourage pollution

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 10:09:09

No Duplicates.



**Comment 88 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Veronica  
Last Name: Michael  
Email Address: veromich@comcast.net  
Affiliation:

Subject: Factory Farm Gas  
Comment:

Stop Public Funding For Factory Farm Gas

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 10:23:21

No Duplicates.

**Comment 89 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Rozae

Last Name: Nichols

Email Address: rozae@floraanimalia.com

Affiliation:

Subject: Gas killing Farm Animals

Comment:

We urge you to end this process of killing Fsrn Animas

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 10:35:23

No Duplicates.

## **Comment 90 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Briana

Last Name: Anderson

Email Address: bbanderson0220@gmail.com

Affiliation:

Subject: Comment on proposed low carbon fuel standard amendments

Comment:

To whom it may concern,

I am a lifelong Missouri resident with a long family history of small farmers. I have seen the harm inflicted by factory farms in my state, and I am fully aware of the negative impacts of factory farms on the environment, public health, animal welfare, and local economies. Nobody in Missouri wants these harmful farms - we want to support local small farms with regenerative practices.

When I learned that the CARB wants to include factory farm gas in its Low Carbon Fuel Standard, I became so confused. The science is very clear that methane is not a climate-friendly gas. Everyone is aware that factory farms are nothing but harmful. Allowing factory farms to sell the methane created by housing massive numbers of cows and hogs as a supposedly "carbon negative fuel" is a completely harmful and misguided idea. Please consider the negative consequences of this proposal and scrap it. We can do better.

Thank you for your time,

Briana

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 10:32:39

No Duplicates.

**Comment 91 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Marisa  
Last Name: Landsberg  
Email Address: marisalandsberg@verizon.net  
Affiliation:

Subject: Factory Farm  
Comment:

Please stop investing in factory farm gas.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 10:48:17

No Duplicates.

**Comment 92 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Wendy

Last Name: Allen

Email Address: wendy38677@aol.com

Affiliation:

Subject: Factory farms

Comment:

A heinous process that has tortured countless innocent animals.  
Please stop funding this cruel slaughter of animals.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 10:59:30

No Duplicates.

**Comment 93 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Lionel  
Last Name: Friedberg  
Email Address: lionelfriedberg9@gmail.com  
Affiliation:

Subject: Factory Farm Gassing  
Comment:

The abomination of euthanization by heat and carbon dioxide is beyond cruel and barbaric and has no place in a civilized society in the 21st century.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 11:03:08

No Duplicates.

## **Comment 94 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Armond  
Last Name: Matevosian  
Email Address: amatevosian@outlook.com  
Affiliation:

Subject: Constantly beholden to money and industry  
Comment:

It's sad to see the state of affairs of politicians and government officials of today. Constantly beholden to corporate and industry bribery, corruption, and lobbying. Always looking the other way. Always doing their bidding.

How have you all reached this point in your lives? How much is enough for you all to actually finally have a conscience and do the right thing? I assume you all have children, family, pets, etc...does it not register with any of you regarding what you are leaving behind?

Sad. Do the right thing for once in your lives. Just once.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 11:08:00

No Duplicates.

**Comment 95 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Pamela

Last Name: Maxfield

Email Address: humcotherapist@gmail.com

Affiliation:

Subject: Stop Investing In Factory Farm Gas!

Comment:

Biogas is unsustainable; I am against funding this harmful practice!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 11:20:34

No Duplicates.



**Comment 96 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Debbie

Last Name: Meeks

Email Address: [deborah.meeks@shell.com](mailto:deborah.meeks@shell.com)

Affiliation:

Subject: Shell Comments on LCFS Amendments

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6342-lcfs2024-WyhTPVA0VmkCaAQq.pdf](http://www.arb.ca.gov/lists/com-attach/6342-lcfs2024-WyhTPVA0VmkCaAQq.pdf)'

Original File Name: Shell.Letter.15FEB24.2.pdf

Date and Time Comment Was Submitted: 2024-02-16 11:22:44

No Duplicates.

**Comment 97 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Liza  
Last Name: Tucker  
Email Address: liza@consumerwatchdog.org  
Affiliation: Consumer Watchdog

Subject: Proposed Low Carbon Fuel Standard Amendments  
Comment:

Please find Consumer Watchdog's public comment on proposed amendments to CARB's Low Carbon Fuel Standard.  
Many Thanks,  
Liza Tucker  
Consumer Advocate  
Consumer Watchdog

Attachment: 'www.arb.ca.gov/lists/com-attach/6355-lcfs2024-WzdcOVw7ACAFXAd3.pdf'

Original File Name: LCFS Public Comment From CWD.pdf

Date and Time Comment Was Submitted: 2024-02-16 11:50:11

No Duplicates.

## **Comment 98 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Adam

Last Name: Aranyos

Email Address: aaranyos@duck.com

Affiliation:

**Subject: Urgent Call for Ethical and Environmental Reforms in California's Agriculture**  
**Comment:**

Dear Governor Newsom and Members of the California Air Resources Board,

I am reaching out to express my profound concern not only about the environmental impact of factory farming in California but also about the inherent cruelty to animals that these industrial practices perpetuate. The support for biogas production from industrial dairies under the Low Carbon Fuel Standard (LCFS) policies, while intended to promote renewable energy, inadvertently endorses and sustains these harmful and inhumane practices.

The state of California has long stood as a beacon of progress in environmental protection and ethical standards. However, the continued financial incentives for biogas as a byproduct of factory farming practices are in stark contradiction to these values. Beyond the significant issues of water pollution, groundwater depletion, and greenhouse gas emissions, the system of factory farming inflicts tremendous suffering on countless animals. These sentient beings are confined in overcrowded, unnatural conditions, deprived of their basic instincts and welfare, all in the name of efficiency and profit.

Supporting biogas production under the current LCFS policies not only overlooks but also financially rewards the environmental degradation and animal cruelty inherent in the factory farming model. This approach detracts from the urgent need to shift towards more sustainable and humane agricultural practices. It sends a misleading message that we can mitigate climate change without addressing the root causes of these crises, including the ethical treatment of animals.

I implore you and the CARB to reconsider the implications of supporting biogas production within the LCFS. This is a pivotal moment to align our environmental policies with a broader vision of sustainability that includes animal welfare. We must end the cycle of cruelty and environmental harm by investing in alternatives that respect animal rights and contribute to a healthier planet.

I urge you to take a stand against the greenwashing of factory farming and to lead the way in adopting policies that promote genuine sustainability, respect for animal life, and the wellbeing of our communities. The upcoming review of LCFS policies presents an invaluable opportunity to correct our course and commit to a future that values all forms of life and the integrity of our environment.

Thank you for considering this critical issue. I trust in your leadership to make decisions that reflect our shared values of compassion, sustainability, and justice.

Sincerely,  
Adam Aranyos

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 12:13:12

No Duplicates.

## **Comment 99 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Vasu

Last Name: Murti

Email Address: vasumurti@netscape.net

Affiliation:

Subject: stop public funding for factory farm gas

Comment:

The Democratic Party platform should support: Animal Rights, Defending the Affordable Care Act, Ending Citizens United, Ending Marijuana Prohibition, Giving Greater Visibility to Pro-Life Democrats, Gun Control, Net Neutrality, Raising the Minimum Wage to \$15 an Hour, Responding to the Scientific Consensus on Global Warming, and a Sustainable Energy Policy. Democrats for Life of America, 10521 Judicial Drive, #200, Fairfax, VA 22030, (703) 424-6663

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 12:28:44

No Duplicates.

**Comment 100 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jesse  
Last Name: Nowicki  
Email Address: jnowicki@rpmgllc.com  
Affiliation:

Subject: Comments on Proposed LCFS Program  
Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6364-lcfs2024-B3VXIVY6AjYCWwFi.pdf'

Original File Name: RPMG Comment Letter - LCFS Proposed Amendments February 2024.pdf

Date and Time Comment Was Submitted: 2024-02-16 12:33:53

No Duplicates.

## **Comment 101 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Eric

Last Name: Sherman

Email Address: eric@bangzoomstudios.com

Affiliation:

Subject: Stop Funding Factory Farm Gas

Comment:

Factory farms are cruel and inhumane. And they should not be funded with taxpayer dollars. I'm against factory farms and don't want my hard earned money supporting them.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 14:24:03

No Duplicates.

**Comment 102 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Cristin

Last Name: Reno

Email Address: Cristin.reno@oberonfuels.com

Affiliation: Oberon Fuels

Subject: Oberon Fuels Comments on Proposed LCFS Amendments 2024

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6383-lcfs2024-AG8FYVUxUXABaFI8.pdf'

Original File Name: Oberon Fuels Comments on CARB LCFS Regulations 2024.pdf

Date and Time Comment Was Submitted: 2024-02-16 14:28:52

No Duplicates.



**Comment 103 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Kristen

Last Name: Lowry

Email Address: Lowrykristen@yahoo.ca

Affiliation:

Subject: Factory Farm Gas

Comment:

As a nation, we have to do better for our country & our planet

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 14:35:46

No Duplicates.

**Comment 104 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Heather  
Last Name: Dziedzic  
Email Address: heather@americanbiogascouncil.org  
Affiliation: American Biogas Council

Subject: American Biogas Council Comments on the Proposed Amendments to the LCFS  
Comment:

Attached please find the American Biogas Council's comments on the proposed amendments to the LCFS. Thank you!

Attachment: 'www.arb.ca.gov/lists/com-attach/6390-lcfs2024-WjtRNQZkWVVVMAVq.pdf'

Original File Name: ABC\_CommentLetter\_LCFS\_Feb2024.pdf

Date and Time Comment Was Submitted: 2024-02-16 14:58:58

No Duplicates.

**Comment 105 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Tank

Last Name: Conner

Email Address: sheepy\_bah@hotmail.com

Affiliation:

Subject: Low Carbon Fuel Standard (LCFS)

Comment:

Please end current Low Carbon Fuel Standard (LCFS) policies that reward factory farm polluters. No greenwashing.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 15:06:09

No Duplicates.

**Comment 106 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Dyan  
Last Name: Osborne  
Email Address: dyan3926@att.net  
Affiliation:

Subject: Animal Abuse  
Comment:

Just stop it. All of it. Go vegan! &#127793;

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 15:41:01

No Duplicates.

**Comment 107 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Perri  
Last Name: Glass  
Email Address: perriglass@hotmail.com  
Affiliation:

Subject: Factory farming  
Comment:

Factory farms are disastrous for the environment and the animals imprisoned within.  
What don't you understand? Environmental degradation and extreme animal abuse are unacceptable.  
Human greed such as this is totally repugnant.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 16:22:29

No Duplicates.

**Comment 108 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: ROMONA  
Last Name: WILLIAMS  
Email Address: romonajoyce@aol.com  
Affiliation: The Williams Family

Subject: Stop Factory Farm Fueling In California  
Comment:

Dear Sir, To who it may concern The population of factory farm gas has to be stop. We want California to be a safe, clean and healthy state. Please do so right now!!!! Sincerely, Romona Williams

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 16:30:03

No Duplicates.

**Comment 109 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: CCA comments on LCFS amendments

Comment:

letter attached

Attachment: 'www.arb.ca.gov/lists/com-attach/6414-lcfs2024-VjUFYAdnBQIVMAIm.pdf'

Original File Name: CCA Comments to CARB on LCFS 2.16.24.pdf

Date and Time Comment Was Submitted: 2024-02-16 16:42:10

No Duplicates.

**Comment 110 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Amy

Last Name: Hamilton

Email Address: ozarksoilhealth@gmail.com

Affiliation:

Subject: methane incentive

Comment:

As a nation we spend an inordinate amount of money on corn and bean agriculture and helping confinement feeding operations. Our agricultural policies are having far reaching effects on invasive species. Cattle, goat and sheep producers are having a tough time competing with subsidized CAFO production and invasive are taking over as grassland farmers go out of business.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 16:51:28

No Duplicates.



## **Comment 111 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Margot  
Last Name: McMillen  
Email Address: margotmcmillen@gmail.com  
Affiliation:

Subject: LCFS2024  
Comment:

As a person that lives near a giant swine confinement, I protest the building of any more of these factory facilities. This one has devastated my neighborhood and forced many people to move away. Because of the ventilation systems that must be engaged at all times, the collection of methane from this system is incomplete so that much methane escapes. Other pollution includes water pollution after the effluent is spread on fields. Our stream team finds excess nitrogen in the streams every spring. Building more of these giant facilities will only mean more pollution. Don't be fooled by promises that they will produce power that can be used. They don't.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 17:19:18

No Duplicates.

**Comment 112 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Joanne

Last Name: Hedge

Email Address: hedgegraphics@earthlink.net

Affiliation: Sustainability advocate, Glendale CA

Subject: Biogas is not "good"

Comment:

Growing research & investigations of Big Dairy & corporate agricultural complicity in polluting air, water, and land add up to greater climate impacts at a time when we require less, and way less! Consumers are finding dairy alternatives due to lacto intolerance & legitimate investigations of inhumane treatment of cows & calves.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 17:53:43

No Duplicates.

**Comment 113 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Darlene

Last Name: Powell

Email Address: Darlene.powell@comcast.net

Affiliation:

Subject: Carbon fuel standard

Comment:

Please lower the carbon fuel standard.

Sincerely

Nancy McCormick

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 18:04:45

No Duplicates.

**Comment 114 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Felena

Last Name: Puentes

Email Address: fpuentes19@att.net

Affiliation:

Subject: Stop

Comment:

Stop the gas

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 18:10:29

No Duplicates.

**Comment 115 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Nancy  
Last Name: McCormick  
Email Address: 7riannon@gmail.com  
Affiliation:

Subject: Low carbon fuel standard  
Comment:

Please consider the low carbon fuel standard.

Thank you

Nancy McCormick

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 18:09:13

No Duplicates.

**Comment 116 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Marcia  
Last Name: Nelson  
Email Address: marcianelson1220@aol.com  
Affiliation: Farm Sanctuary

Subject: Factory Farm Gas  
Comment:

STOP INVESTING IN FACTORY FARM GAS WITH TAXPAYER MONEY!!!!!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 18:39:47

No Duplicates.

**Comment 117 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Catherine

Last Name: Santos

Email Address: catesanto@gmail.com

Affiliation:

Subject: Stop Public Funding for Factory Farm Gas

Comment:

End current Low Carbon Fuel Standard (LCFS) policies that reward  
factory farm polluters!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 19:27:18

No Duplicates.

**Comment 118 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Mary

Last Name: Moreno

Email Address: cperezmoreno@yahoo.com

Affiliation: Connie's Crooked Creations

Subject: Stop using valuable resources

Comment:

We cannot continue to pay for farmers to abuse our water systems.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 19:43:09

No Duplicates.



**Comment 119 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Pati

Last Name: Tomsits

Email Address: patito12@att.net

Affiliation:

Subject: Stop Public Funding For Factory Farm Gas

Comment:

Stop investing in factory farm gas!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 20:21:54

No Duplicates.

**Comment 120 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Ellen  
Last Name: Riegelhuth  
Email Address: eriegelhuth@yahoo.com  
Affiliation:

Subject: Investing in biogas means investing in even more factory farm pollution.  
Comment:

Please END current Low Carbon Fuel Standard (LCFS) policies that  
reward factory farm polluters!

Thank YOU!&#128591;

Best Regards,  
Ellen Riegelhuth

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 20:24:47

No Duplicates.

**Comment 121 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Wayne

Last Name: Johnson PhD

Email Address: waynezorro@gmail.com

Affiliation:

Subject: Low Carbon Gas

Comment:

For the sake of the environment. Shut down the dairy industry  
California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 20:41:25

No Duplicates.

**Comment 122 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: C

Last Name: s

Email Address: csoragha@hotmail.com

Affiliation:

Subject: Low Carbon

Comment:

Please consider this amendment now and help protect our children  
and communities!!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-16 20:44:35

No Duplicates.

**Comment 123 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Tera

Last Name: Martinez

Email Address: teram888@gmail.com

Affiliation:

Subject: Consider proposed low carbon fuel standard amendments for Farms

Comment:

Please consider the use of low carbon fuel for Farms.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 00:15:52

No Duplicates.

**Comment 124 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: John  
Last Name: Pasqua  
Email Address: Johnpasqua57@gmail.com  
Affiliation:

Subject: Biogas  
Comment:

End the greenwashing.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 01:01:52

No Duplicates.

**Comment 125 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Ted  
Last Name: Myers  
Email Address: emiltonmyers@verizon.net  
Affiliation:

Subject: Factory Farm Gas  
Comment:

This one of the leading contributors to global warming. Want a planet? Stop all high-methane, like cow and pig manure from entering the atmosphere.

Sincerely,  
Ted Myers

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 01:34:00

No Duplicates.

**Comment 126 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Denise  
Last Name: Vandermeer  
Email Address: somulk@aol.com  
Affiliation:

Subject: Biogas  
Comment:

Please do not use public funds to support biogas projects. These projects create more factory farms which produce more climate damage not less.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 06:16:08

No Duplicates.



**Comment 127 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: K L  
Last Name: Johnson  
Email Address: pineridge1j@outlook.com  
Affiliation: MRCC

Subject: California Air Resources Board  
Comment:

I understand wanting to make air quality better; however, capturing methane gas from farms would exacerbate another problem which is factory farming of animals. This practice abuses farm animals and increases corporate takeover of family farms of US citizens by Chinese and Brazilian corporations and/or governments.

It's a horrible idea that only increases corporate profits at the expense of humane farming practices in the US by family farmers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 07:25:19

No Duplicates.

**Comment 128 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Mary  
Last Name: Jones  
Email Address: mrsjonesworld@yahoo.com  
Affiliation: Protect Pomme de Terre

Subject: California low carbon fuel standard amendment  
Comment:

Hello.

My name is Beth Jones. I'm with a Midwest grassroots organization called PROTECT POMME DE TERRE. Pomme de Terre is our local lake and river that is at risk of being polluted with waste water from a BIG BEEF processing facility that thinks they can do whatever they want to our land and water ways with no consequences. In the past year they have found out that we at Protect Pomme de Terre will not stand for it. This California law is ruining our Midwestern aquaphers. They have already destroyed Iowa. We in Missouri sit on one of the biggest and most pristine aquaphers in The country. We will NOT STAND BY AND WATCH FACTORY FARMS DESTROY IT! If California wants to make methane then they should move all the factory farms out there and let them continue to destroy Californians environment. See how the people out there that like that methane also like the mess that creates it. Thank you very much for your time.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 07:49:05

No Duplicates.

**Comment 129 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Bernard  
Last Name: Fenner  
Email Address: [bernard.fenner@ductor.com](mailto:bernard.fenner@ductor.com)  
Affiliation:

Subject: Ductor Americas Inc - Comments on the Proposed Low Carbon Fuel Standard Amendments

Comment:

Dear Mr. Botill:

Thank you for the opportunity to comment on the Proposed Low Carbon Fuel Standard (LCFS) Amendments and updated Life Cycle Analysis (LCA) and Documentation. The LCFS is one of the most powerful climate change policies in the world, uniquely supporting a wide array of innovative, low-carbon fuel production pathways. Its success has proven a model for similar programs that are emerging in other states and countries. We strongly encourage the California Air Resources Board (CARB) to amend the program in a manner that protects and builds on its successful, technology-neutral and science-based approach to ensure the program continues to drive innovation and greenhouse gas reductions for decades into the future.

Find attached Ductor Americas' Comments on the Proposed Low Carbon Fuel Standard Amendments

Best regards, Bernard

Attachment: '[www.arb.ca.gov/lists/com-attach/6505-lcfs2024-VDBXJFIwUXZQOQh6.pdf](http://www.arb.ca.gov/lists/com-attach/6505-lcfs2024-VDBXJFIwUXZQOQh6.pdf)'

Original File Name: Ductor comments\_LCFS Amendments\_Feb 2024\_final.pdf

Date and Time Comment Was Submitted: 2024-02-17 08:05:32

No Duplicates.

**Comment 130 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Nancy  
Last Name: Rasmussen  
Email Address: gnras@yahoo.com  
Affiliation:

Subject: Proposed Low Carbon Fuel Standard Amendments  
Comment:

Please stop encouraging CAFOs, which is what this proposal will do. Missouri and the nation need small farmers who care about the land, our communities and our country. Giving preference to large corporations who are often foreign owned and do not care for anything but making money is wrong. Please wake up to what pride of ownership and pride of caring for our land and communities is all about. You are supposed to represent those who elected you, and not those paid to lobby for corporate interests. Please have the courage to stand up and actually represent the people of Missouri rather than multinational corporations.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 12:25:36

No Duplicates.

**Comment 131 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Desiree  
Last Name: Mitchell  
Email Address: sfsonshine@aol.com  
Affiliation:

Subject: No Factory Farm funding  
Comment:

Please do NOT use taxpayer dollars to pay for ANYTHING for farms that harm the environment, especially oil or gas that pollutes our air. Gas should be a thing of the past and certainly not something that taxpayers purchase without our approval. Most Californians do not want to spend our taxes funding factory farms in any way. Thank you for considering those who pay here in the Golden State.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 12:50:24

No Duplicates.

**Comment 132 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jason

Last Name: Linn

Email Address: jalinn@calpoly.edu

Affiliation:

Subject: end current Low Carbon Fuel Standard (LCFS) policies that reward factory farm polluters!

Comment:

end current Low Carbon Fuel Standard (LCFS) policies that reward factory farm polluters!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 12:58:38

No Duplicates.

**Comment 133 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Lucinda

Last Name: Mayoral

Email Address: lucinda\_mayoral@live.com

Affiliation:

Subject: Protect our environment and food supply by ending factory farming

Comment:

Instead of investing in factory farming biogas, invest in sustainable humane certified farms and dairies. As a progressive and forward-thinking state, Californians are aware of the significant body of research that shows large scale factory farms, dairies and feedlots lead to environmental damage, lower quality food and milk, and unnecessary cruelty to the sentient beings who nourish us. California should be following the example of the various farms within our state and country who truly care about the environment by utilizing regenerative practices while providing a high-quality food supply and treating the animals who feed us with the care they deserve. See Niman Ranch, Clover, Force of Nature, Rancho Llano Seco, Stemple Creek Farm, Hart Dairy, Organic Pastures Dairy, etc. Let's truly be a forward-thinking state by ending factory farming once and for all. Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 13:36:01

No Duplicates.

**Comment 134 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Diana  
Last Name: Ekholm  
Email Address: Diana.shycoff@yahoo.com  
Affiliation:

Subject: Public funding for factory farm gas  
Comment:

To whom it may concern,

I am writing to expressly ask you vote against public support for factory farming gas. Factory farms are the biggest contributor to pollution of all water ways.

Thank for your consideration,  
Diana Ekholm

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 18:08:46

No Duplicates.



**Comment 135 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Laura

Last Name: Berland-Shane

Email Address: [laura@blueplanetsystems.com](mailto:laura@blueplanetsystems.com)

Affiliation: Blue Planet Systems

Subject: Blue Planet Comments on the Proposed Low Carbon Fuel Standard Amendments

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6579-lcfs2024-BmRUPgRwBDIHXgR0.pdf](http://www.arb.ca.gov/lists/com-attach/6579-lcfs2024-BmRUPgRwBDIHXgR0.pdf)'

Original File Name: Blue Planet LCFS comments 2.17.24.pdf

Date and Time Comment Was Submitted: 2024-02-17 18:20:25

No Duplicates.

**Comment 136 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jessie

Last Name: Melendrez

Email Address: jessieboy2feathers@hotmail.com

Affiliation:

Subject: Factory farming.

Comment:

Factory farming is not healthy for humans and is torture for animals and dangerous for employees as the stress for rapid meat production makes employees make careless mistakes that end up in death and limb loss.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 19:45:22

No Duplicates.

**Comment 137 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Mariquita  
Last Name: West  
Email Address: mqqwest@gmail.com  
Affiliation:

Subject: Stand firm to fight climate change  
Comment:

Dear California Air Resources Board,

Please do not slither backwards on low carbon fuel standards. You have been par tof California's leadership in fighting climate change.

Do Not Give Up Now!  
Our kids depend on you.

Sincerely,  
Mariquita West  
Los Gatos, CA 95031

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 21:26:55

No Duplicates.

**Comment 138 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Guadalupe  
Last Name: Sanchez-Luna  
Email Address: kidtrail@aol.com  
Affiliation:

Subject: biogas  
Comment:

We need a healthier California!! It is not a wise decision to keep using our tax dollars to invest in biogas when it is polluting the air we breath. You have the opportunity to adopt new rules and stop rewarding factory farms for polluting our air. I hope you will make an intelligent choice.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-17 21:31:59

No Duplicates.

**Comment 139 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Shannon  
Last Name: Speigner  
Email Address: shannonspeigner@gmail.com  
Affiliation:

Subject: Animals & land  
Comment:

I support the humane treatment of animals and a cleaner environment.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-18 01:08:51

No Duplicates.

**Comment 140 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Anne  
Last Name: Schedeen  
Email Address: aschedeen@gmail.com  
Affiliation:

Subject: Quickly fix the Low Carbon Fuel Standard  
Comment:

Dear California Air Resources Board,

Time to turn this unjust, LCSF policy around. What was the reason for ever making such a decision in the first place? Whatever it was, allowing big corps to defile Californias environment looks to be a deal which never should have even been considered.

The people of this state stand behind you in any and all your efforts to get rid of the LCSF legacy. The time is now.

Sincerely,  
Anne Schedeen  
Cathedral City, CA 92234

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-18 04:13:17

No Duplicates.

**Comment 141 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Shirley  
Last Name: Lindquist  
Email Address: sahl@lbbl.com  
Affiliation:

Subject: California gas  
Comment:

Don't let California california-cate our farms here in the Midwest

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-18 07:16:31

No Duplicates.

## **Comment 142 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Ivan

Last Name: Light

Email Address: ihlight607@gmail.com

Affiliation: Inverness Ridge Association

Subject: low carbon fuel standard amendments

Comment:

Eliminate avoided methane crediting for fuel derived from livestock manure.

- Oppose Proposed LCFS Amendment Loophole to Allow Petroleum Projects with Carbon Capture & Storage Past the 2040 Phase-out.

I recommend a number of measures, to wit:

Conduct and incorporate a full life cycle assessment of all air pollution and greenhouse gas (GHG) emissions for all pathways, and their implications for environmental justice communities.

- Create ZEV multipliers to boost electric school bus and electric public transit bus and rail system deployments.

- Eliminate credit generation from factory farm gas projects that would have happened anyway due to other programs or investments.

- Include intrastate jet fuel as a deficit generator and include California's share of the fuel used in interstate and international flights.

- Allow credits for zero-emission transportation fuels used for ocean-going vessels, and simplifying the process for credits for shore power installations serving electrified harbor crafts and for dispensing green hydrogen.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-18 08:49:13

No Duplicates.



**Comment 143 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Daniel  
Last Name: Medrano  
Email Address: d.medrano87@yahoo.com  
Affiliation:

Subject: factory farm energy pollution  
Comment:

factory farm biogas is unsustainable. it does not reduce the dairy industry's environmental footprint. In fact, investing in biogas helps maintain and expand factory farms. Investing in biogas means investing in more factory farm pollution

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-18 09:23:24

No Duplicates.

## **Comment 144 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Norm  
Last Name: Sandler  
Email Address: nordicup@msn.com  
Affiliation:

Subject: Environmental Efficiency  
Comment:

I'd like to introduce a new term / measure when considering energy, "Environmental Efficiency". For example, the average, grid-scale solar / storage operation has an Environmental Efficiency of 1.1 MWh / acre. A large nuclear plant, with a large "safety barrier", has an Environmental Efficiency of ~40 MWh / acre. And a next-gen natural gas fired generating station has an Environmental Efficiency of ~80 MWh / acre.

In other words, while a 24,000 MWh / day natural gas generating station might sit on a half-square mile of land, a similar solar / storage operation would require ~40 square miles of land; obscenely abusive and low Environmental Efficiency.

And that does not include any of the raw materiel / rare earths mining, production in highly polluting countries such as China, nor the poor performance and accelerated life-time performance degradation.

Then there is the human rights issue, but that might be better captured in a separate category.

The point being there is "no free lunch"; miles and miles of virgin lands and waters are being abused, animals of land, sea and air are being murdered and all for the whimsy of politicians in DC and Davos.

Remember, fossil fuels, such as natural gas, are simply Mother Nature's stored solar energy; she's a very clever Lady.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-18 11:11:49

No Duplicates.

## **Comment 145 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Chris

Last Name: Gilbert

Email Address: chris@gilbertbiz.com

Affiliation:

Subject: get rid of loopholes and misguided credits in current and proposed LCFs rules

Comment:

- Eliminate avoided methane crediting for fuel derived from livestock manure.
- Oppose Proposed LCFS Amendment Loophole to Allow Petroleum Projects with Carbon Capture & Storage Past the 2040 Phase-out.
- Eliminate credit generation from factory farm gas projects that would have happened anyway due to other programs or investments.

Plus:

- Conduct and incorporate a full life cycle assessment of all air pollution and greenhouse gas (GHG) emissions for all pathways, and their implications for environmental justice communities.
- Create ZEV multipliers to boost electric school bus and electric public transit bus and rail system deployments.
- Include intrastate jet fuel as a deficit generator and include California's share of the fuel used in interstate and international flights.
- Allow credits for zero-emission transportation fuels used for ocean-going vessels, and simplifying the process for credits for shore power installations serving electrified harbor crafts and for dispensing green hydrogen.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-18 12:29:32

No Duplicates.

**Comment 146 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Robbi

Last Name: Buchholtz

Email Address: rbuchholtz@dakotaethanol.com

Affiliation: Dakota Ethanol

Subject: comments on proposed 2024 LCFS amendments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6675-lcfs2024-BWFSNQBqV2sEdgJj.pdf'

Original File Name: Dakota Ethanol comment letter on 2024 proposed LCFS amendments.pdf

Date and Time Comment Was Submitted: 2024-02-18 13:01:34

No Duplicates.

**Comment 147 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Pat  
Last Name: Lord  
Email Address: plord724@gmail.com  
Affiliation:

Subject: Funding of Factory Farming of Animals  
Comment:

Dear agent,

California has more industrial dairies than any other state, polluting our rivers, depleting our groundwater, and emitting disastrous greenhouse gasses. Now, factory farm polluters claim they are environmentally friendly because they produce "biogas." Even worse, they are using our tax dollars to fund this harmful greenwashing.

Please do all you can to end public funding of factory farms. We are opposed to factory farming of animals especially due to its hideous cruelty to the animals and the polluting effects on our environment.

We, the public who are opposed to these operations, object to funding them.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-18 13:02:15

2 Duplicates.

**Comment 148 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Daniel  
Last Name: Loftis  
Email Address: Daniel\_loftis@hotmail.com  
Affiliation:

Subject: No more factory farms  
Comment:

Stop allowing these factory farms.  
They are bad for everyone except corporations  
You know they are bad yes they build wealth for companies and  
create jobs instead of small family owned farms.

Daniel Loftis

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-18 17:44:57

No Duplicates.

**Comment 149 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Asher  
Last Name: Goldman  
Email Address: asher@generatecapital.com  
Affiliation: Generate Capital

Subject: Generate Capital Comments on Amendments to LCFS  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6713-lcfs2024-BmFRMgNsAjQAdFMy.pdf'

Original File Name: Generate Capital Comments on LCFS\_vF.pdf

Date and Time Comment Was Submitted: 2024-02-18 21:02:26

No Duplicates.

## **Comment 150 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Travis  
Last Name: Lane  
Email Address: tlane@calgren.com  
Affiliation: Calgren

Subject: Re: Proposed Amendments to the Low Carbon Fuel Standard  
Comment:

February 18, 2024  
The Honorable Liane Randolph  
Chair, California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Proposed Amendments to the Low Carbon Fuel Standard

Dear Chair Randolph:

As you may recall from your visit to our facilities several years ago, Calgren has been producing low carbon intensity renewable fuels in Pixley, California since 2008, shortly before the LCFS start date of January 1, 2010. While others in the renewable fuels industry have occasionally questioned the wisdom of California's LCFS, both in the courts and otherwise, we have been among your strongest and most consistent supporters from the very start. In addition, we remain especially proud of the fact that we have been able to bring well-paid jobs and economic activity to an impoverished area of our great state.

With that background, we offer the following constructive comments to the 45-day language to amend the LCFS:

1. We are disappointed that the proposed changes fail to level the playing field for in-state producers of biomethane.

In 2022 and 2023, CARB staff recommended that Book and Claim accounting for biomethane that is undeliverable to California be phased out. The changes now proposed have abandoned that approach and treat all out-of-state projects, even those that cannot possibly deliver into California, the same as we California producers.

To give but one example of the uneven playing field, California biomethane producers face ever increasing standards for injection into California's pipeline system; California's biomethane injection standards are far more stringent than biomethane producers face in any other state. Yet biomethane producers in those more lenient states may use the same Book and Claim accounting without having to meet the same injection standards. In earlier comments to CARB, we suggested that out-of-state producers be required to meet California's injection standards to use Book and Claim, a concept we continue to support. California gets the vast majority of its pipeline natural gas from out-of-state, yet



there is no mandatory testing of that gas as it enters our state. Hence a biomethane producer is actually (and no doubt inadvertently) encouraged to locate outside California's borders. That is at odds with the Independent Statement of Reasons (ISOR) provided in support of the proposed regulatory changes.

As noted above, CARB staff took a slightly different tack in recommending a sensible restriction - that Book and Claim for out-of-state biomethane producers injecting into pipelines that do not serve California be phased out. The proposed changes to the LCFS have abandoned this sensible approach in favor of applying the same restrictions to in-state producers as are applied to out-of-state producers. Frankly, we think both requirements should apply, i.e. that out-of-state biomethane producers that wish to use Book and Claim accounting both meet California's biomethane quality standards and demonstrate deliverability into California.

In addition to cleaning up California's environment and encouraging in-state commercial activity, another of CARB's laudable goals is to encourage enactment of LCFS-type regulations in other states (ex., page 15 of the ISOR). Those goals are actually (and, again, no doubt inadvertently) thwarted by CARB's willingness to award California carbon credits for renewable fuel that is already in use in those other target states.

In fact, we now take this argument one step farther. Ultimately, LCFS costs get passed on to California residents via higher vehicle fuel costs. We applaud that willingness to pay what it takes to help clean up the air we breathe. But awarding LCFS credits for biomethane that cannot be delivered into California forces Californians to pick up the tab to help clean the air in other geographic regions. That's inappropriate.

It is a fact that new biomethane projects can achieve pipeline injection much quicker if they are out-of-state. While we don't agree with the logic, we have heard that one reason to initially award LCFS credits for out-of-state biomethane projects that cannot deliver into California was to encourage the growth of in-state biomethane production. If so, that goal has been achieved; California biomethane producers are now capable of meeting California's current, commercially attractive biomethane demand.

Continuing to offer LCFS credits for undeliverable biomethane is both unwarranted and detrimental to California biomethane producers.

2. The proposed carbon intensity benchmarks should be stricter sooner, perhaps even this year.

LCFS credits have recently been trading below \$60 per MT. As CARB has heard from all quarters, that is too low. In fact, the recent announcement that CARB would delay adoption of the LCFS changes to "re-evaluat[e] the carbon intensity benchmarks" caused the spot price of carbon credits to jump almost 10%. That is a clear sign that the proposed step-downs need to be more aggressive.

We have consistently endorsed both a stronger step-down and the adoption of an Automatic Acceleration Mechanism (AAM). We hereby urge that the AAM triggers be moved up. As proposed, the mechanism cannot be triggered earlier than 5/15/2027. That is too late.

3. Section 95482(g) prohibits dairy projects breaking ground after

12/31/2029 from generating credits by supplying CNG vehicles after 12/31/2040.

It is difficult to see how this proposed change squares with the goal stated on page 4 of the ISOR of promoting investment in disadvantaged, low-income and rural communities. In California, those are the areas that have benefited from dairy digesters. Terminating credit generation for CNG vehicles before attractive alternatives are available is likely to halt all dairy digester projects that would otherwise break ground after 12/31/2029. For that reason, it is also likely to thwart the separate goal of supporting methane emissions reductions, also appearing on page 4 of the ISOR. In addition, using the LCFS in this manner to pick winners and losers is likely to make it more difficult for other jurisdictions to adopt LCFS-type programs, a goal that is stated on page 15 of the ISOR. We fervently believe that the capture of methane from dairies should be supported, for the overwhelmingly valid reasons stated beginning on page 29 of the ISOR and in SB1382, not thwarted as in this proposed change.

4. Section 95486.1(g) assesses a penalty of four times the actual credit shortfall should a valid pathway holder receive a verified pathway higher than its certified pathway.

The change proposed in Section 95486.1(g) is at odds with the accurate statement in Section 95488.4 that CIs will inherently vary and should not be penalized for such natural variance. It also potentially treats pathway holders worse than petroleum refiners, who have from January 1st through April 30th of each year to acquire Carryback Credits to satisfy prior year credit deficiencies under Section 95486(a)(5). As written, the corrective procedure of Section 95486(a)(5) is available to obligated parties, but it is not clear that it is available to pathway holders. On page 29 of Appendix E, Purpose and Rationale for Low Carbon Fuel Standard Amendments, the rationale for the change to Section 95486.1(g) includes the statement that mechanisms exist to retroactively provide credits to fuel pathway holders when the verified operational CI is lower than the certified CI, but Section 95486(a)(5) is not mentioned. Pathway holders should either not be subject to the proposed penalty or should have a similar opportunity to acquire Carryback Credits.

The success of the LCFS is due in no small part to the enthusiastic support of California producers such as Calgren. We believe in CARB's goals and intend to continue to be among your most ardent supporters. If the comments above are adopted, we sincerely believe those shared goals will be greatly advanced.

Thanks again for all your far-sightedness.

Very truly yours,

Travis Lane, CEO

Attachment: 'www.arb.ca.gov/lists/com-attach/6718-lcfs2024-WjldOgNuAzcEcFUw.pdf'

Original File Name: Calgren CARB Comments 2-18-24.pdf

Date and Time Comment Was Submitted: 2024-02-18 21:48:02

No Duplicates.

**Comment 151 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Greg

Last Name: Rosas

Email Address: thestro15@yahoo.com

Affiliation:

Subject: Stop public funding for factory farm gas

Comment:

I support an end to funding for factory farm gas.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-19 01:31:41

No Duplicates.

**Comment 152 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: William  
Last Name: Brieger  
Email Address: will.brieger@gmail.com  
Affiliation: Climate Action California

Subject: Comments on proposed LCFS amendments (lcfs 2024)  
Comment:

Thank you for all of the work you are doing to move this regulation forward.  
Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6744-lcfs2024-AWIFb101VWtXMAh8.pdf'

Original File Name: Climate Action California LCFS comments.docx.pdf

Date and Time Comment Was Submitted: 2024-02-19 08:26:06

No Duplicates.

**Comment 153 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Laura  
Last Name: Verduzco  
Email Address: laurav@chevron.com  
Affiliation: Chevron Corporation

Subject: Feedback on newly proposed LCFS calculators  
Comment:

Please find attached Chevron's feedback on the newly proposed LCFS calculators.

Attachment: 'www.arb.ca.gov/lists/com-attach/6750-lcfs2024-BjQBN1dkAGcLUlcx.pdf'

Original File Name: 2024 Feedback on LCFS calculators.pdf

Date and Time Comment Was Submitted: 2024-02-19 08:48:47

No Duplicates.

## **Comment 154 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Marti

Last Name: Thomas

Email Address: bullion-ironing01@icloud.com

Affiliation:

Subject: Stop California from Incentivizing MORE Factory Farms in the Midwest!

Comment:

There are many negative consequences that come from this illogical and counterintuitive proposal, and here are two of the big ones: Incentivizing by commoditizing factory farm pollution and paying factory farm corporations for the methane they produce would fuel MORE factory farms, causing MORE methane and greenhouse gases, MORE water and air pollution, and MORE corporate consolidation. This proposal would create additional overproduction of pork and dairy, pushing market prices even further down for independent family farms. Currently, overproduction of pork and dairy and resulting low prices have been devastating for independent family farm livestock producers.

In this climate crisis we must do all we can to protect our land & water resources & the air we breath. Corporate Farms have no interest in doing this, they ravage the land & take all the water then walk away with profits leaving these areas devastated. As well as causing harm to family farmers & we all suffer from their destruction!  
Please stop helping them!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-19 08:47:19

No Duplicates.

## **Comment 155 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Susan

Last Name: Wrasmann

Email Address: swras@fidmail.com

Affiliation:

Subject: Including factory farm gas in California Low Carbon Fuel Standard

Comment:

I grew up in California's central valley in the 50s and 60s but I now live in the Midwest in the heart of factory farming. In addition to the below reasons, I will add that so called "green biogas" is anything but. It is methane, a dangerous greenhouse gas that is just as harmful to the atmosphere as the fossil kind. These farms also harm water quality and property values by their concentrated feeding operations production of concentrated odors and runoff. Please deny this misguided attempt to export your own emissions through carbon credits. Here's what it will do:

- Incentivize more corporate factory farms, harming family farmers, rural communities, and our environment.
- Create more corporate consolidation in the U.S. livestock industry.
- Commoditize methane production, which would fuel more methane producing practices.
- Create additional overproduction of commodities, pork and milk, increasing supply and further pushing down market prices paid to independent family farms.
- Pay foreign multinational meatpackers, like Chinese-owned Smithfield and Brazilian-owned JBS, for their pollution.
- Create incentives for the public (taxpayer dollars through government subsidies) to fund anaerobic digesters to capture factory farm gas.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-19 09:17:53

No Duplicates.



**Comment 156 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Michael

Last Name: Caprio

Email Address: mcaprio@republicservices.com

Affiliation: Republic Services

Subject: Low Carbon Fuel Standard - 45 Day Proposed Rule

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6762-lcfs2024-BnQFZl0sVnBXM1Q4.pdf'

Original File Name: Republic Services Comment Letter - 45 day LCFS Rule.pdf

Date and Time Comment Was Submitted: 2024-02-19 10:30:48

No Duplicates.

**Comment 157 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Jasmin

Last Name: Ansar

Email Address: [jasmin@theclimatecenter.org](mailto:jasmin@theclimatecenter.org)

Affiliation: The Climate Center

Subject: Comments on Proposed LCFS Amendments 2024 - TCC

Comment:

Here are the comments on the Proposed LCFS Amendments 2024 from the Climate Center.

Attachment: '[www.arb.ca.gov/lists/com-attach/6770-lcfs2024-B2FcM1I9UWMDaVIN.pdf](http://www.arb.ca.gov/lists/com-attach/6770-lcfs2024-B2FcM1I9UWMDaVIN.pdf)'

Original File Name: Final TCC letter LCFS 2024 (1).pdf

Date and Time Comment Was Submitted: 2024-02-19 10:57:03

No Duplicates.

**Comment 158 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: John  
Last Name: Duff  
Email Address: john@sorghumgrowers.com  
Affiliation: National Sorghum Producers

Subject: Sorghum comments regarding the proposed amendments  
Comment:

Thank you for the opportunity to comment on this important matter. We greatly appreciate ARB's continued willingness to lead change in this area and are especially grateful for continued improvement of the CA-GREET model. We would also like to provide additional data for this effort. The data we are providing are attached. We also continue to be in close contact with the Argonne National Laboratory, providing this information to them when appropriate, as well. Thank you again for the opportunity to comment, and please do not hesitate to let me know if you have additional questions.

Attachment: 'www.arb.ca.gov/lists/com-attach/6777-lcfs2024-ViUBclY6UmxXMFcl.pdf'

Original File Name: Summary of Sorghum Inputs for CARB.pdf

Date and Time Comment Was Submitted: 2024-02-19 12:03:20

No Duplicates.

**Comment 159 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Ryan  
Last Name: Huggins  
Email Address: legal@pinespire.com  
Affiliation: PineSpire

Subject: Improvements for proposed amendments to Forklifts in LCFS  
Comment:

please see attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/6778-lcfs2024-BnZWOQNsjRQJQZ2.pdf'

Original File Name: PineSpire\_LCFS Rulemaking comments Feb 2024.pdf

Date and Time Comment Was Submitted: 2024-02-19 12:17:32

No Duplicates.

**Comment 160 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Paul  
Last Name: Rozenberg  
Email Address: prozenberg@suburbanpropane.com  
Affiliation: Suburban Propane

Subject: Comments on the Proposed LCFS Amendments  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6779-lcfs2024-UCNWIJQdkUXdRJVAY.pdf'

Original File Name: Suburban Propane - Comments on Proposed LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2024-02-19 12:25:18

No Duplicates.

**Comment 161 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: James

Last Name: Lavelle

Email Address: jim@usredcapital.com

Affiliation: US Renewable Energy Development Capital,

Subject: Comments on the Proposed Amendments to the Low Carbon Fuel Standard

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6780-lcfs2024-UicBdFEiVGIDYQJh.pdf](http://www.arb.ca.gov/lists/com-attach/6780-lcfs2024-UicBdFEiVGIDYQJh.pdf)'

Original File Name: usredcarbletter02192024.pdf

Date and Time Comment Was Submitted: 2024-02-19 12:24:54

No Duplicates.

**Comment 162 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Andrew  
Last Name: Cullen  
Email Address: andrew.cullen@penske.com  
Affiliation:

Subject: Comments on Proposed Low Carbon Fuel Standard Amendments  
Comment:

Dear California Air Resources Board:

Thank you for the opportunity to provide comments on the California Air Resources Board (CARB) Proposed Low Carbon Fuel Standard (LCFS) Amendments. Penske Truck Leasing Co., L.P. ("Penske") is a nationwide leader in low-emission transportation with a company-wide commitment to a comprehensive transition to zero-emission vehicles (ZEVs). We share CARB's greenhouse gas reduction goals and federal air quality objectives; therefore, we are excited to offer our expertise and insights into these proposed amendments.

Please see our attached comments responding to the draft LCFS amendments, including changes in EV third party verification, infrastructure crediting, and forklift reporting criteria. Our comments underscore the challenges and opportunities inherent in the transition to ZEVs, and we hope to continue partnering with agencies to streamline requirements and goals across multiple programs to better support this critical technology.

Sincerely,  
Andrew Cullen  
Senior Vice President - Fuels and Facility Services, Penske

Attachment: 'www.arb.ca.gov/lists/com-attach/6791-lcfs2024-UCBSMVM8WHgEaQB1.pdf'

Original File Name: Penske LCFS Program Changes Comment Letter\_February 2024.pdf

Date and Time Comment Was Submitted: 2024-02-19 13:57:27

No Duplicates.

**Comment 163 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: James  
Last Name: Duffy  
Email Address: duffje@msn.com  
Affiliation: Former LCFS Branch Chief

Subject: Restore Balance to the LCFS  
Comment:

Please see attached comment letter.

Attachment: '[www.arb.ca.gov/lists/com-attach/6792-lcfs2024-AWUGdQdgVmMHeAZZ.pdf](http://www.arb.ca.gov/lists/com-attach/6792-lcfs2024-AWUGdQdgVmMHeAZZ.pdf)'

Original File Name: Duffy\_LCFS\_45-day\_Comments.pdf

Date and Time Comment Was Submitted: 2024-02-19 14:13:51

No Duplicates.



**Comment 164 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Alli  
Last Name: McIntosh  
Email Address: alli@skynrg.com  
Affiliation:

Subject: Comments on Proposed Changes to the LCFS Regulation  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6794-lcfs2024-VWdRZ1NgUzRSeQMz.pdf'

Original File Name: 2024-02-19 SkyNRG Comments on Proposed Changes to the LCFS  
Regulation.pdf

Date and Time Comment Was Submitted: 2024-02-19 14:26:04

No Duplicates.

**Comment 165 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Mary  
Last Name: Solecki  
Email Address: msolecki@ajw-inc.com  
Affiliation:

Subject: AJW comments on LCFS proposed amendments  
Comment:

Please see attached file for AJW comments. Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/6795-lcfs2024-BTdVZwAxBGUDNwk5.pdf'

Original File Name: 240220 AJW LCFS Amendments\_AAM\_Comment Letter.pdf

Date and Time Comment Was Submitted: 2024-02-19 15:03:14

No Duplicates.

**Comment 166 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Tadashi  
Last Name: Ogitsu  
Email Address: ogitsu@mac.com  
Affiliation:

Subject: Questions and comments for 2023 LCFS Amendments  
Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6796-lcfs2024-AXBcL1w4WHhSIFA5.pdf](http://www.arb.ca.gov/lists/com-attach/6796-lcfs2024-AXBcL1w4WHhSIFA5.pdf)'

Original File Name: Questions and comments for LCFS 2023 Amendment Feb 19 2024.pdf

Date and Time Comment Was Submitted: 2024-02-19 15:30:18

No Duplicates.

**Comment 167 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Spencer  
Last Name: Reeder  
Email Address: spencer.reeder@audi.com  
Affiliation: Audi of America, Inc.

Subject: Resubmittal for Audi of America: LCFS Amendment comments  
Comment:

**\*\*NOTE:** This is a re-submittal, the version of our comments submitted earlier today was an incomplete earlier draft. Please see attached version and use this one (labelled "final") as the one for consideration (and posting to the public server). This submittal should supersede those submitted by me on behalf of Audi of America earlier today.

thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/6798-lcfs2024-AmNXJFE0VG5WDwNg.pdf'

Original File Name: Audi\_Comments\_LCFS\_ISOR\_20Feb2024\_final.pdf

Date and Time Comment Was Submitted: 2024-02-19 15:45:51

No Duplicates.

**Comment 168 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Nathalie

Last Name: Hoffman

Email Address: Nathalie.Hoffman@weaver.com

Affiliation: Weaver

Subject: Validation & verification rotation requirements

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6809-lcfs2024-USYBYgdnVHEFZgR2.pdf'

Original File Name: Weaver - LCFS Amendment Comment Letter - 02.19.24 - FINAL.pdf

Date and Time Comment Was Submitted: 2024-02-19 18:01:08

No Duplicates.

**Comment 169 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Charles

Last Name: Purshouse

Email Address: cpurshouse@camcorng.com

Affiliation:

Subject: Camco comments on Proposed LCFS Amendments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6814-lcfs2024-WmhcalxvWT4FXFI+.pdf'

Original File Name: 2024\_LCFSRegChangesCamcoComments.pdf

Date and Time Comment Was Submitted: 2024-02-19 19:00:23

No Duplicates.

**Comment 170 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Susan  
Last Name: Mayer  
Email Address: artersa@att.net  
Affiliation:

Subject: No BIOGAS State Subsidies for Factory Farms!  
Comment:

PLEASE: Do not use MY TAX DOLLARS to subsidize inhumane factory farming!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-19 20:51:11

No Duplicates.

**Comment 171 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Fred  
Last Name: Ghatala  
Email Address: fghatala@advancedbiofuels.ca  
Affiliation: Advanced Biofuels Canada Association

Subject: Support for LCFS inclusion of jet fuel  
Comment:

Please find included comments from Advanced Biofuels Canada on the  
subject rulemaking.

Attachment: 'www.arb.ca.gov/lists/com-attach/6819-lcfs2024-UTBXM1QzBTULUgJh.pdf'

Original File Name: ABFC\_CARB\_LCFS comments\_Jet Fuel\_Inclusion\_February 20 2024.pdf

Date and Time Comment Was Submitted: 2024-02-19 20:05:15

No Duplicates.



## **Comment 172 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Jim

Last Name: Stewart

Email Address: drjimstewart@gmail.com

Affiliation:

Subject: Eliminate avoided methane crediting for fuel derived from livestock manure.

Comment:

- Eliminate avoided methane crediting for fuel derived from livestock manure.
- Oppose Proposed LCFS Amendment Loophole to Allow Petroleum Projects with Carbon Capture & Storage Past the 2040 Phase-out.
- Conduct and incorporate a full life cycle assessment of all air pollution and greenhouse gas (GHG) emissions for all pathways, and their implications for environmental justice communities.
- Create ZEV multipliers to boost electric school bus and electric public transit bus and rail system deployments.
- Eliminate credit generation from factory farm gas projects that would have happened anyway due to other programs or investments.
- Include intrastate jet fuel as a deficit generator and include California's share of the fuel used in interstate and international flights.
- Allow credits for zero-emission transportation fuels used for ocean-going vessels, and simplifying the process for credits for shore power installations serving electrified harbor crafts and for dispensing green hydrogen.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-19 21:20:55

No Duplicates.

**Comment 173 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Don

Last Name: Gilstrap

Email Address: dgilstrap@chevron.com

Affiliation:

Subject: Chevron Comments on Biofuel Guardrails

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6825-lcfs2024-WjlcMII2AicDd1M8.pdf'

Original File Name: Chevron Comments on 2024 LCFS Rulemaking (guardrails).pdf

Date and Time Comment Was Submitted: 2024-02-19 22:57:19

No Duplicates.

**Comment 174 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Don

Last Name: Gilstrap

Email Address: dgilstrap@chevron.com

Affiliation:

Subject: Chevron Comments on Technical Amendments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6826-lcfs2024-VjUHavI2ACUAdFM8.pdf'

Original File Name: Chevron Comments on 2024 LCFS Rulemaking (technical).pdf

Date and Time Comment Was Submitted: 2024-02-19 22:58:42

No Duplicates.

## **Comment 175 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Charles  
Last Name: Davidson  
Email Address: charlesdavidson@me.com  
Affiliation: Sunflower Alliance/Rodeo Citizens Assoc

Subject: Concerns Regarding LCFS Eligibility and Claims by the Phillips 66 and Marathon refineries

Comment:

From: Charles Davidson, Sunflower Alliance and the Rodeo Citizens Association. Hercules, CA  
To: California Air Resources Board (CARB)  
Date: February 20, 2024  
Re: Concerns Regarding LCFS Eligibility and Claims by the Rodeo Phillips 66 and Martinez Marathon Refineries

Dear Chair Liane Randolph, CARB Members, and Hon. Dr. Steven Cliff,

I write to express urgent concerns about claims made by the Phillips 66 San Francisco Refinery in Rodeo and the Martinez Marathon Refining Company regarding their renewable diesel projects' eligibility under CARB's Low Carbon Fuel Standard (LCFS). Their claims misrepresent the eligibility criteria and carbon greenhouse gas footprint requirements of renewable diesel, but also exploit regulatory loopholes, potentially violating CARB regulations. Specifically, these LCFS violations regard both the use of virgin food oil non-waste feedstock for renewable diesel and the fact that renewable diesel refining is profoundly energy intensive.

Existing lax GHG auditing by CARB, allows the refineries to misuse generous State and Federal low-carbon subsidies for projects that are financially dependent on using unearned LCFS certifications. For LCFS-accredited CO2 greenhouse gas reduction projects for renewable diesel, there is an urgent need for rigorous guardrails and pre- and post-project per barrel GHG auditing.

### KEY ISSUES:

1. Misallocation of LCFS Exemptions: Both refineries are inappropriately claiming LCFS tailpipe GHG exemption allowances for renewable diesel from virgin food oils, traditionally reserved for waste-based feedstocks. Tailpipe CO2 emissions from fuel combustion represents 75% of total lifecycle GHGs, whether from renewable diesel or petroleum diesel. Removing tailpipe GHG emissions from LCFS GHG accounting for virgin food oil feedstock, promotes a massive, unjust food-to-fuels conversion pipeline. According to CARB's own documents, tailpipe CO2 exemption allowances should only be reserved for rendered waste fats, oils and greases (ie, FOGs), not virgin food oils, because:

The CO2 emitted from vehicles during [used cooking oil] biofuel

combustion is considered carbon neutral...as the carbon released was uptaken from the atmosphere within a short timeframe by the plant that produced the oil. [A. Low Carbon Fuel Standards (LCFS). p.19. CARB. <https://ww2.arb.ca.gov/sites/default/files/2020-09/basics-notes.pdf>]

2. Lack of Carbon Intensity Reduction Evidence: There is no substantial evidence to demonstrate a reduction in carbon intensity per barrel of renewable diesel produced (compared to the pre-project petroleum baseline). Instead, both project's Environmental Impact Reports (EIRs) clearly demonstrate a large (post-project) increase in per barrel hydrogen production and the resultant large increase in per barrel GHG emissions. (1)

3. Inadequate CARB Oversight: The refineries' claims have been locally approved without sufficient scrutiny, despite public comment on these matters. The mere fact of CARB not auditing these GHG-related discrepancies in LCFS qualification scoring, highlights critical oversights in CARB's lifecycle GHG assessment capabilities for renewable diesel projects dependent on substantial GHG-reduction subsidies.

#### IMPLICATIONS:

The Phillips 66 Rodeo Renewed Project and Marathon's Martinez Renewable Fuels Project, being among the largest hydrogen-based renewable diesel initiatives globally, involve significant financial and reputational stakes. Yet, both refineries' environmental claims stand on shaky ground, with potential loopholes allowing continued use of high-emission petroleum-refining processes.

What has been lost amongst the public promotion of renewable diesel and the Rodeo Renewed Project, is that Phillips 66's Environmental Impact Report maintains a little-known backdoor loophole that will allow the refinery to continue to use their high GHG-emitting, massive bottom-of-the-barrel petroleum-refining Delayed Coker complex.

#### RECOMMENDATIONS:

Reevaluate LCFS Eligibility: CARB must closely examine and rectify the misapplication of LCFS exemptions for high-GHG virgin food oil-sourced renewable diesel, that is extremely expensive, requires subsidies and always has critical supply constraints that make its unrestricted use for transportation fuel a potential national security issue

Implement Rigorous GHG Accounting: It's imperative to introduce stringent, project-specific GHG accounting, hydrogen accounting and auditing measures to ensure the veracity of claimed environmental benefits and prevent greenwashing.

Promote Transparency and Sustainability: By addressing these issues, CARB can reinforce its commitment to environmental stewardship and truly sustainable energy solutions. I trust CARB will take these concerns seriously, ensuring that LCFS certifications and subsidies genuinely contribute to reducing GHG emissions and advancing sustainable practices.

Sincerely,

Charles Davidson

PS: FOOTNOTES

1) INCREASE IN REFINERY-LEVEL CO2 GHG EMISSIONS PER BARREL:  
% Increase, estimated based on EIR-provided information, relative increase from petroleum baseline, ie, refinery-wide, yearly Mt CO2, divided by yearly product amount. (Mt CO2; million tons of CO2e GHGs).

Phillips 66: ~54-76% (relative increase from baseline) --  $(2.147 / 2.171 \text{ Mt CO}_2 = 0.99) \div [(67/105 \text{ bpd} = 0.64)\text{-to-}(67/120\text{K(capacity) bpd} = 0.56)] = \sim (1.54\text{-to-}1.76)/1.00$

Marathon: ~77% (relative increase from baseline) --  $(2.169 / 1.145 \text{ MtCO}_2 = 0.53) \div (48\text{K} / 160\text{K(capacity) bpd} = 0.3) = 0.53 / 0.3 = \sim 1.77/1.00$

LIMITATION OF RENDERED WASTE FEEDSTOCK SUPPLY: By 2030, the combined renewable diesel feedstock needs of Phillips 66 and Marathon, alone, will be 97.3 % of CARB's projected amount of total California waste oil (FOG) feedstock available, until 2045 (neither including, nor considering, CARB's ambitious SAF aviation target goals).

CONSEQUENCES OF THE ABOVE LIMITATIONS: If the renewable diesel from only the Phillips 66 and Marathon were combined, ~ 43% of ALL US soybeans would go to renewable diesel (or fungible edible food-quality alternatives, IF there were no waste FOGs used in their manufacture). This would equal an area planted entirely with soybeans, row-by-row, the size of the State of Michigan planted border-to-border. "To produce 100 percent of 2022 US diesel fuel consumption in the transportation sector would require more than 160 million metric tons (MMT) of feedstock, which is 10 times US production of vegetable oils in 2022 or 80 percent of global vegetable oil production in 2022" Everything You Wanted to Know About Biodiesel and Renewable Diesel. (Jan. 10, 2024) The Union of Concerned Scientists.  
<https://blog.ucsus.org/jeremy-martin/all-about-biodiesel-and-renewable-diesel/>

SUPPLY INSTABILITY EXACERBATING THE ABOVE LIMITATIONS: Foreign sources of soybeans have profoundly decreased since the war in the Ukraine began and most recently, because the collapse of soybean production in Argentina (a major global soybean producer) due to drought. Specifically, noting that "in the 2022/23 season, Argentina had a historical crop failure caused by hot, dry conditions enhanced by a third consecutive La Niña. The USDA estimated Argentina's 2022/23 production at 25 million metric tons, the smallest since 1999/00, with a 43% drop from the previous year. Local sources such as the Buenos Aires Grains Exchange went even lower, putting last year's production at 21 million metric tons." Beginning over one year before the invasion of Ukraine and since, the rate of inflation for global virgin food oils has increase at a faster rate than all other major food items.

In stating their reasons for limiting renewable diesel production the Union of Concerned scientists state the following need "to be realistic about where they come from, and limit feedstocks to sustainable resources used at a reasonable scale to avoid turning a helpful tool into a harmful dead end. The realistic potential for biofuel conversions is quite small because of the limited availability of suitable feedstocks. Exaggerated hype about potential for refinery conversions to biofuel production amounts to greenwashing that distracts from more scalable solutions."

[Everything You Wanted to Know About Biodiesel and Renewable Diesel. Also, see: The overlooked hub of South American: New Trase data on Argentina's soy supply chain highlights how indirect soy supply in South America could be hiding deforestation in global supply chains. Soy. (Aug. 11. 2022)  
<https://trase.earth/insights/argentina-the-overlooked-hub-of-south-american-soy>]

SUMMARY: Virgin food oil supply is becoming increasingly limited for various geopolitical, climate change, market structure and other reasons. The first step towards limiting the misuse of valuable virgin food resources is limiting their being misused for LCFS accreditation and government subsidies. The method to achieve LCFS truthfulness would be a loophole-free auditing of lifecycle CO2 GHGs for renewable diesel, on a per barrel basis with the full accounting of hydrogen production metrics and tailpipe emissions.

CC: ATTACHMENT [SAME AS ABOVE TEXT]

Attachment: 'www.arb.ca.gov/lists/com-attach/6829-lcfs2024-UzUBbgdoBzUCaAhX.docx'

Original File Name: FINAL \*\*\* California Air Resources Board (CARB) Date- February 20, 2024 Re- Concerns Regarding LCFS Eligibility and Claims by Phillips 66 and Marathon Refining Dear Chair Liane Randolph .docx

Date and Time Comment Was Submitted: 2024-02-20 00:17:32

No Duplicates.

**Comment 176 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Eddy  
Last Name: Nupoort  
Email Address: enupo@nelhydrogen.com  
Affiliation: Nel Hydrogen

Subject: Written comment on the inclusion of MHD-HRI stations in the LCFS  
Comment:

Find attached the written comment from Nel Hydrogen to the proposed inclusion of MHD-HRI stations in the proposed LCFS amendment.

Best regards  
Eddy Nupoort  
Nel Hydrogen

Attachment: 'www.arb.ca.gov/lists/com-attach/6832-lcfs2024-VzkCYQRpAg4AcVQm.pdf'

Original File Name: NEL\_written-comment-LCFS-amendment-public-hearing\_20-02-2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 04:14:53

No Duplicates.



**Comment 177 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Bryan  
Last Name: Sievers  
Email Address: bsievers@roesleinae.com  
Affiliation: Roeslein Alternative Energy

Subject: Comments on Proposed Amendments to Low Carbon Fuel Standard  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6835-lcfs2024-VyVVMlYyVloCZ1M8.docx'

Original File Name: RAE\_CommentLetter\_LCFS\_Feb2024\_EXECUTED.docx

Date and Time Comment Was Submitted: 2024-02-20 06:32:11

No Duplicates.

## **Comment 178 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Mark

Last Name: Stoermann

Email Address: mstoerm@newtrient.com

Affiliation: Newtrient LLC

Subject: Newtrient LLC Comments on the Proposed Amendments to the Low Carbon Fuel Standard

Comment:

Newtrient appreciates the opportunity to comment on the proposed amendments to the Low Carbon Fuel Standard (LCFS). Newtrient was founded by leading milk cooperatives and organizations, representing 20,000 dairy farmers producing approximately half of the nation's milk supply.

Newtrient applauds the leadership the California Air Resources Board (CARB) is taking on climate change and appreciates being a part of this important dialogue surrounding potential changes to the Low Carbon Fuel Standard (LCFS). The dairy industry has answered the call to action and is embracing environmental responsibility - from family farms in California, to farms across America. By installing and utilizing biogas systems, farms are offering practical solutions to the challenges CARB seeks to address.

Two programs directed by the California Department of Food and Agriculture (CDFA) have been particularly vital to the progress California has made. According to the 2023 CARB Mid-Year Data Update report on the cumulative progress of the California Climate Investments Program (CCIP), the Dairy Digester Research and Development Program (DDRDP) and the Alternative Manure Management Program (AMMP) have received a total of \$309.1 million in funding and have reduced 23.2 million MTCO<sub>2e</sub>. The funding for these programs represents 1.86% of the California Climate Investments program as of May 31, 2023, but the GHG reductions from these two programs represent 23.69% of the total for all California Climate Investments programs .

In December of 2022, researchers at UC Davis published the study, Meeting the Call: How California is Pioneering a Pathway to Significant Dairy Sector Methane Reduction in which they stated "...analysis shows that continued implementation and commitment to the incentive-based climate smart solutions that are currently driving voluntary dairy methane reduction in California should, by 2030, achieve the full 40 percent reduction in dairy methane sought by state regulators without the need for direct regulation."

With our support of CARB and the LCFS in mind, Newtrient would like to offer the attached Comments on the proposed amendments to the Low Carbon Fuel Standard.

Attachment: 'www.arb.ca.gov/lists/com-attach/6836-lcfs2024-BTdXZVBhUTAEMgM7.pdf'

Original File Name: 240208 -Newtrient-LCFS-Comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 06:52:16

No Duplicates.

## **Comment 179 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Kim

Last Name: Dupre

Email Address: duprekk@gmail.com

Affiliation:

Subject: LCFS Public Comments

Comment:

I'm speaking today as a resident of rural America, one who has lived in the shadow of factory farms and biogas digesters. Despite all the promises from DNR, local elected officials, and experts over the years that this farm/biogas digester wouldn't hurt our water quality or way of life....that has not aged well in Emerald, Wisconsin.

I watched several in my neighborhood lose their drinking water - the Town Hall's well which originally had nitrates at 6.9 ppm just a few years ago - now has nitrates consistently near 40 ppm and has spiked to 52 and 62 ppm.

This farm keeps getting larger. We've seen the implementation of biogas digesters become a rationale for increasing herd sizes.... yet our drinking water is not getting cleaner - but actually much worse. The biogas digester exploded and burned up after a few years and wasn't replaced, but the damage was already done, and our water has not improved.

My neighbors watched the nitrates rapidly increase over the same time in their private wells, many of which don't drink their water anymore - some won't even give it to their pets. Well drillers have said "we can dig you a well, but we can't guarantee you drinkable water." One neighbor experienced that firsthand when selling his home - a new well 200 feet deep well was still testing at 17 ppm for nitrates. He had to install a reverse osmosis system to get the property sold - but then the new family, with small children, moved away within a year because they were concerned about the water quality.

E.coli has also been found in several wells in our neighborhood over the years - which made turning on my faucet every day a "crap shoot" in my mind. That led to the heartbreaking decision my husband and I finally made to leave our acreage in Wisconsin for safer spaces in Minnesota - a place where we can drink the water and serve it to family and friends without fear.

Clean water is the only driver of economic development in rural areas. No one wants to locate a home, subdivision, or business if clean drinking water is not available. To incentivize manure production over milk production is damaging to our environment. There is no way our soils can absorb that concentrated nutrient load from digestate when they are already 5-6x higher in phosphorus than what is recommended by University of Wisconsin for growing crops. TMDLs are common in many agricultural parts of Wisconsin - green rivers, streams, and lakes by the 4th of July. Nitrates in

groundwaters are still rising per a 10-year study in St. Croix County, Wisconsin.

I make the analogy that this feels like these energy companies have come in and raided our kitchens, made a disastrous mess, and leaving us to clean it up and deal with the consequences.

As a resident of the St. Croix River Valley for over 25 years (a Wild & Scenic River, part of the National Park System), I ask that you look at the long-term picture - plan for the next generation and not just the next years' dollars.

As a farmer's daughter, I get that farming has changed....but what has not, or will EVER change, is our need for clean drinking water.

Attachment: '[www.arb.ca.gov/lists/com-attach/6837-lcfs2024-BWBVIABIUFxVO1U6.jpg](http://www.arb.ca.gov/lists/com-attach/6837-lcfs2024-BWBVIABIUFxVO1U6.jpg)'

Original File Name: ESD\_Home\_PhosSoilTests2021.jpg

Date and Time Comment Was Submitted: 2024-02-20 07:17:18

No Duplicates.

**Comment 180 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Neil  
Last Name: Koehler  
Email Address: neil.koehler@kbe-llc.com  
Affiliation: Renewable Fuels Association

Subject: Renewable Fuels Association comments on proposed LCFS Amendments  
Comment:

RFA comments attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6838-lcfs2024-USMCYIY2V1sLbgFu.pdf'

Original File Name: RFA Comments on CARB LCFS Ammendments 02-20-24.pdf

Date and Time Comment Was Submitted: 2024-02-20 07:21:26

No Duplicates.

**Comment 181 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Nasser

Last Name: Kutkut

Email Address: [nkutkut@smartchargetech.com](mailto:nkutkut@smartchargetech.com)

Affiliation: Smart Charging Technologies LLC

Subject: Proposed Low Carbon Fuel Standards Regulations and Its Impact on Bank Size and  
Credit Pric

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6839-lcfs2024-UiEBZFciU14BawZj.pdf](http://www.arb.ca.gov/lists/com-attach/6839-lcfs2024-UiEBZFciU14BawZj.pdf)'

Original File Name: SCT Letter to CARB - LCFS Credit Bank & Step-down Schedule.pdf

Date and Time Comment Was Submitted: 2024-02-20 07:24:31

No Duplicates.

**Comment 182 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Mireille

Last Name: Ferdinand-Hercule

Email Address: mireille.ferdinand-hercule@valero.com

Affiliation:

Subject: Diamond Green Diesel LLC's Comments on 2024 Proposed LCFS Amendments

Comment:

Please find the attached comments for Diamond Green Diesel.

Attachment: '[www.arb.ca.gov/lists/com-attach/6840-lcfs2024-BzVQZINgBGcFXFRk.pdf](http://www.arb.ca.gov/lists/com-attach/6840-lcfs2024-BzVQZINgBGcFXFRk.pdf)'

Original File Name: 2020 02 19 Diamond Green Diesel - Comments on 2024 Proposed LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2024-02-20 07:31:17

No Duplicates.



**Comment 183 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Dawn  
Last Name: Caldwell  
Email Address: dawnc@renewablefuelsne.org  
Affiliation: Renewable Fuels Nebraska

Subject: Low Carbon Fuel Standard Comments  
Comment:

See Uploaded File.

Attachment: 'www.arb.ca.gov/lists/com-attach/6842-lcfs2024-B2QBZl0uU2IGbFU2.pdf'

Original File Name: CARBLCFSCommentsFeb24.pdf

Date and Time Comment Was Submitted: 2024-02-20 08:11:36

No Duplicates.

## **Comment 184 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Amanda  
Last Name: Parsons DeRosier  
Email Address: Amanda.DeRosier@gceholdings.com  
Affiliation: Global Clean Energy

Subject: Comments on Proposed LCFS Amendments 2024  
Comment:

February 20, 2024

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Chair Randolph and Honorable Members of the Board,

Thank you for your continued dedication to enhancing air quality in the Golden State through the proposed updates to the Low Carbon Fuel Standard Program (LCFS). We commend your decision to further encourage and not restrict the use of crop-based feedstocks within the proposed LCFS amendments under consideration.

The proposed accounting requirement for crop-based feedstocks, to trace their origin and undergo independent certification, aligns with the California Air Resources Board's commitment to ensuring crop-based feedstocks do not contribute to adverse impacts associated with land use change or limiting food supply. This proactive approach addresses concerns raised by the Environmental Justice Advisory Committee (EJAC) regarding "expanse of global deforestation, unsustainable land conversion, or adverse food supply impacts."

Our company, Global Clean Energy, stands ready to assist CARB in achieving this important goal. As a California-based renewable fuel innovator with offices in Torrance and a renewable fuels production facility in Bakersfield, we work tirelessly to ensure renewable fuels that we produce can have the lowest possible carbon intensity. What sets us apart is our focus on producing ultra-low carbon renewable fuels using *Camelina sativa* (camelina), a crop that alleviates the foregoing concerns.

Unlike other renewable fuel feedstocks, camelina is nonfood. Camelina is quick to mature, is tolerant to drought, promotes biodiversity, sequesters carbon as it is grown, and provides soil health benefits similar to those of cover crops. Importantly, camelina does not displace food crops when grown. Instead, it grows on existing farmland during the fallow between crop cycles - providing a new revenue source to farmers and rural agricultural communities while also strengthening our domestic energy supply. With these unique traits, camelina has the potential to be the lowest carbon intense renewable fuel feedstock on the market.

Labeled as an "Intermediate Crop," camelina falls under a new classification of biofuel and renewable fuel feedstocks. "Intermediate Crops" act as harvestable cover crops that can reach maturity during an idle or fallow period on existing farmland, which does not cause land use change or adversely impact food supply. Intermediate crops like camelina can help California and our nation reach our renewable fuel and SAF goals responsibly through biomass.

As you endeavor to create an accounting mechanism to track feedstocks to their point of origin and develop the independent feedstock certification process recommended within your proposed LCFS rule, we encourage you not to recognize the importance of emerging crops like camelina. By incentivizing the further adoption of "Intermediate Crops" like camelina among growers and renewable fuel producers, we can help ensure land use change is prevented, soil health is protected, and renewable fuel feedstock demand can be met responsibly.

As new crops, education and incentives are vital to ensure "Intermediate Crops'" continued adoption and future success. Recognizing that newer feedstocks lack the resources of traditional commodities like soy or corn, we recommend that accounting rules should not place "Intermediate Crops" like camelina at a financial disadvantage as they establish themselves within the market.

As experts in this emerging field of "Intermediate Crops" we stand ready to work with CARB staff and others to lend data and provide guidance in the development of an accounting mechanism addressing GHG and air pollution emissions associated with feedstock production pathways.

We look forward to working together to ensure Intermediate Crops are supported while these accounting criteria are developed. Thank you for taking the time to consider our comments.

Sincerely,

Amanda Parsons DeRosier  
Vice President of Public Affairs and Investor Relations  
Global Clean Energy [www.GCEholdings.com](http://www.GCEholdings.com)

Attachment: '[www.arb.ca.gov/lists/com-attach/6843-lcfs2024-VjAAb10yUGIDaVUK.pdf](http://www.arb.ca.gov/lists/com-attach/6843-lcfs2024-VjAAb10yUGIDaVUK.pdf)'

Original File Name: FINAL GCE LCFS Letter Letterhead.pdf

Date and Time Comment Was Submitted: 2024-02-20 08:21:59

No Duplicates.

**Comment 185 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Lisa  
Last Name: Hanke  
Email Address: lhanke@ecoengineers.us  
Affiliation: EcoEngineers

Subject: EcoEngineers Comments on 2024 Proposed LCFS Amendments  
Comment:

Letter

Attachment: 'www.arb.ca.gov/lists/com-attach/6845-lcfs2024-UGJQZIJhWT5SCwBs.pdf'

Original File Name: 2024 LCFS Amendments Comments EcoEngineers .pdf

Date and Time Comment Was Submitted: 2024-02-20 08:50:20

No Duplicates.

**Comment 186 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Carol  
Last Name: Tjong  
Email Address: carol.tjong@frionaindustries.com  
Affiliation:

Subject: CARB LCFS Rulemaking Comments  
Comment:

Please see attached comments from Hereford Ethanol Partners, L.P.

Attachment: 'www.arb.ca.gov/lists/com-attach/6846-lcfs2024-UWNVY1xvUzQLIwg4.pdf'

Original File Name: 2024.02.20 CARB 2024 Rulemaking LCFS Comments Submitted by  
HEP.pdf

Date and Time Comment Was Submitted: 2024-02-20 09:01:48

No Duplicates.

**Comment 187 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Rosalie  
Last Name: Barcinas  
Email Address: Rosalie.Barcinas@sce.com  
Affiliation: SCE

Subject: SCE Supports LCFS Regulation Amendments with Modifications  
Comment:

SCE supports the proposed amendments to the LCFS regulation with the following modifications, which are discussed in detail in the attachment: (1) combine the separate holdback project lists proposed for equity and nonequity projects; (2) specify that utilities have discretion to select the most appropriate projects for their customers and require the large investor-owned utilities (IOUs) to fund at least three program options; (3) retain the 10% administrative cost cap for Holdback programs because 5% is insufficient; (4) align the administrative cost cap for the statewide Clean Fuel Reward Program with other large utility incentive programs; (5) update vehicle eligibility for the Statewide Clean Fuel Reward Program to conform to CARB's goals; and (6) reject the 1-mile requirement for capacity credits in favor of greater flexibility.

Attachment: 'www.arb.ca.gov/lists/com-attach/6847-lcfs2024-ViVQNVYyWFQCZ1I9.pdf'

Original File Name: SCE Comments LCFS Amendment Comments.Feb20.24.pdf

Date and Time Comment Was Submitted: 2024-02-20 09:07:30

No Duplicates.

**Comment 188 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Mark

Last Name: Neuburger

Email Address: mneuburger@counties.org

Affiliation: California State Association of Counties

Subject: California State Association of Counties (CSAC) - Letter of Concern

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6848-lcfs2024-AGNQJVExWGgBWFI+.pdf'

Original File Name: CSAC Letter - CARB 2.20.24.pdf

Date and Time Comment Was Submitted: 2024-02-20 09:39:36

No Duplicates.

**Comment 189 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Alexandria  
Last Name: Reed  
Email Address: alexandria.reed@gm.com  
Affiliation:

Subject: Low Carbon Fuel Standard: 2024 Proposed Amendments  
Comment:

General Motors LLC (GM) appreciates the opportunity to offer comments on CARB's Low Carbon Fuel Standard (LCFS) Proposed Amendments for 2024. Please see the attachment.

Attachment: '[www.arb.ca.gov/lists/com-attach/6849-lcfs2024-AjBTZQQ3BGNWD1V1.pdf](http://www.arb.ca.gov/lists/com-attach/6849-lcfs2024-AjBTZQQ3BGNWD1V1.pdf)'

Original File Name: 2024 02\_CARB LCFS Regulatory Updates\_GM FINAL.pdf

Date and Time Comment Was Submitted: 2024-02-20 09:51:28

No Duplicates.



**Comment 190 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jordan

Last Name: Garfinkle

Email Address: jordan.garfinkle@bloomenergy.com

Affiliation: Bloom Energy

Subject: Comments of Bloom Energy - Proposed Amendments to the Low Carbon Fuel Standard  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6850-lcfs2024-WzhSO1U5BzkGZQln.pdf'

Original File Name: Comments of Bloom Energy\_2.20.24.pdf

Date and Time Comment Was Submitted: 2024-02-20 09:49:43

No Duplicates.

**Comment 191 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Krysta

Last Name: Wanner

Email Address: krysta@westernpga.org

Affiliation: Western Propane Gas Association

Subject: LCFS Proposed Amendments

Comment:

Please see attached letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/6851-lcfs2024-Am4HYIE2BCQAWQdr.pdf'

Original File Name: LCFS Letter 2.20.2024 WPGA.pdf

Date and Time Comment Was Submitted: 2024-02-20 10:01:27

No Duplicates.

**Comment 192 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Esabella

Last Name: Rojas

Email Address: erojas@lachamber.com

Affiliation: Los Angeles Area Chamber of Commerce

Subject: LAACC Opposition to Jet Fuel Proposal

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6852-lcfs2024-Uz9VMgZmBDQLbgVa.pdf'

Original File Name: LAACC\_ CARB Letter\_.pdf

Date and Time Comment Was Submitted: 2024-02-20 10:03:12

No Duplicates.

## **Comment 193 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Lisa

Last Name: Whelan

Email Address: lisa@iowacci.org

Affiliation: Iowa Citizens for Community Improvement

Subject: Reform the LCFS

Comment:

Iowa Citizens for Community Improvement urges the Air Resources Board to grant the recent Petition for Rulemaking to Exclude All Fuels Derived from Biomethane from Dairy and Swine Manure and amend the LCFS accordingly. Iowa CCI is a statewide organization with a communication base of 15,000 everyday Iowans working to win social, environmental, economic and racial justice. We want to reform our food and farm systems to work for farmers, workers, eaters, and the planet. Amending the LCFS to exclude fuels from methane captured from factory farms is an important step toward this critical reform.

The current flaws in the LCFS, such as "avoided methane crediting" and inaccurate life cycle assessments, not only enable pollution but disproportionately harm low-income communities and communities of color. Factory farms, predominantly situated in these marginalized areas, inflict severe damage on air, water, public health, rural economies, and overall quality of life.

We urge you to consider and prioritize the following reforms to the LCFS:

1. Eliminate "avoided methane crediting" in 2024.
2. Address inaccuracies in the Life Cycle Assessment that ignore associated up and downstream greenhouse gas emissions from factory farm gas production.
3. Remove the 10-year "grace period" for factory farm gas producers.
4. Stop double counting by allowing factory farm gas projects paid for and claimed by other programs to sell LCFS credits as well.

We are extremely concerned that the LCFS, which the ARB adopted with the intention to reduce greenhouse gases from California transportation fuels, will perversely incentivize more and larger hog and dairy confinements in Iowa. Over the last several decades, the number of permitted livestock facilities has increased dramatically from 722 (93% hog) in 2001 to over 10,000 in 2017. But recently, the Iowa legislature exempted confinement operations from a permitting requirement for operations greater than 8,500 animal units if an operation installs an anaerobic digester system to capture biogas. The Cedar Rapids Gazette reports that nine Iowa dairies have applied for permits for anaerobic digesters, seven are expanding herd sizes as part of the process, and two are utilizing the exemption because their herd sizes will exceed 8,500 animal units.

The LCFS program has drawn significant interest from factory farms in California and other states with many factory farms taking advantage of lucrative LCFS credits. We do not want to see your transportation fuel policy entrench and enrich corporations like

Iowa Select, Smithfield, Tyson, JBS, and Prestage Farms at the expense of our communities, land, air, and water. Even worse, we are extremely concerned that the value of LCFS credits for biomethane from hog and dairy waste will incentivize expansions and even more confinement operations. Right now, Iowa agricultural runoff is contributing approximately 30 percent of the nitrogen load feeding the Gulf Dead Zone off the coast of Louisiana, and that amount has been increasing. And this runoff is polluting our drinking water as well. Turning Iowa factory farms into sources of credits to offset California transportation fuel emissions will inevitably generate more incentives to increase more manure which will further degrade our communities and water quality.

We hope that you recognize the consequences that your policy choice has inflicted and will inflict. We urge you to amend the LCFS to stop utilizing out-of-state factory farms as a source of offsets for your pollution trading scheme. We also ask that, at a minimum, you amend the LCFS to correct the over-valuation of manure-based credits to include all climate pollution associated with the factory farm system and ensure that credits from non-additional reductions do not continue.

Instead of pitting our states and residents against each other, we should be working together to implement real solutions that protect our communities, our farmers, our workers, and our planet. Thank you for considering these comments.

Attachment: '[www.arb.ca.gov/lists/com-attach/6853-lcfs2024-UGJWYFxxvBGMFLQQ2.docx](http://www.arb.ca.gov/lists/com-attach/6853-lcfs2024-UGJWYFxxvBGMFLQQ2.docx)'

Original File Name: 2024.2.20 CCI comment letter - CA LCFS.docx

Date and Time Comment Was Submitted: 2024-02-20 10:06:31

No Duplicates.

**Comment 194 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Lasse  
Last Name: Moelgaard-Nielsen  
Email Address: las@umwelt.energy  
Affiliation: Umwelt Energy

Subject: Comments to Proposed Low Carbon Fuel Standard Amendments  
Comment:

Umwelt Energy appreciates the opportunity to provide feedback on the CARB's proposed amendments to the LCFS regulation.

As detailed in the attached, our comments pertain to Section 95482(d)(2) of the LCFS.

Attachment: 'www.arb.ca.gov/lists/com-attach/6855-lcfs2024-Wy5ROIQiUGZXPVcj.pdf'

Original File Name: Umwelt Energy - CARB LCFS Comments\_signed 02.20.2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 10:13:05

No Duplicates.

**Comment 195 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Dean

Last Name: Taylor

Email Address: Dean@calETC.com

Affiliation: Calif Electric Transportation Coaliton

Subject: CalETC comments on Proposed 2024 LCFS amendments

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6856-lcfs2024-UjFQN1Y7UGYKeFU2.pdf](http://www.arb.ca.gov/lists/com-attach/6856-lcfs2024-UjFQN1Y7UGYKeFU2.pdf)'

Original File Name: CalETC comment letter on proposed LCFS amendments Feb 20, 2024 vF.pdf

Date and Time Comment Was Submitted: 2024-02-20 10:17:24

No Duplicates.

**Comment 196 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Nancy  
Last Name: Young  
Email Address: nyoung@gevo.com  
Affiliation: Gevo, Inc.

Subject: Gevo's Comments on the LCFS Amendments Proposal  
Comment:

Please find attached the comment letter from Gevo, Inc. on CARB's  
LCFS proposal. Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/6858-lcfs2024-BTdUYgc0B2AHX1A3.pdf'

Original File Name: 2024 Gevo LCFS Rulemaking Comments\_2-20-24.pdf

Date and Time Comment Was Submitted: 2024-02-20 10:39:10

No Duplicates.



**Comment 197 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Dean  
Last Name: Taylor  
Email Address: Dean@CaIETC.com  
Affiliation:

Subject: EVCA-CaIETC joint comments on proposed 2024 LCFS  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6859-lcfs2024-VDEAcFAyWGoKIQVm.pdf'

Original File Name: EVCA-CaIETC comment letter on proposed LCFS amendments Feb 20,  
2024 vF.pdf

Date and Time Comment Was Submitted: 2024-02-20 10:47:03

No Duplicates.

**Comment 198 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Evan  
Last Name: Rosenberg  
Email Address: [evan.rosenberg@srectrade.com](mailto:evan.rosenberg@srectrade.com)  
Affiliation: SRECTrade

Subject: SRECTrade Comments on Proposed LCFS Amendments  
Comment:

See attachment

Attachment: '[www.arb.ca.gov/lists/com-attach/6860-lcfs2024-UiFRJQNnADACcFcl.pdf](http://www.arb.ca.gov/lists/com-attach/6860-lcfs2024-UiFRJQNnADACcFcl.pdf)'

Original File Name: SRECTrade LCFS Comments\_2.20.2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 10:42:17

No Duplicates.

**Comment 199 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Julie

Last Name: Busse

Email Address: busse@ncga.com

Affiliation: National Corn Growers Association (NCGA)

Subject: National Corn Growers Association Comments on the Proposed Amendments to the LCFS

Comment:

Attached, please find the National Corn Growers Association (NCGA)'s comments on the proposed amendments to the LCFS. Thank you for the opportunity to provide this feedback.

Attachment: '[www.arb.ca.gov/lists/com-attach/6861-lcfs2024-VmQCMFFgBWQANAc3.pdf](http://www.arb.ca.gov/lists/com-attach/6861-lcfs2024-VmQCMFFgBWQANAc3.pdf)'

Original File Name: 240220 NCGA - LCFS 2024 Rulemaking Comments (Final).pdf

Date and Time Comment Was Submitted: 2024-02-20 10:58:50

No Duplicates.

**Comment 200 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Tom  
Last Name: Hance  
Email Address: thance@gordley.com  
Affiliation: US Canola Association

Subject: Low Carbon Fuel Standard Proposed Amendments  
Comment:

Attached are comments submitted on behalf of the US Canola  
Association

Attachment: 'www.arb.ca.gov/lists/com-attach/6862-lcfs2024-UCVRJFU3UWMAWQQp.pdf'

Original File Name: USCA - CARB - LCFS Proposed Amendments - Comments - 2024 Feb  
(002).pdf

Date and Time Comment Was Submitted: 2024-02-20 11:16:59

No Duplicates.

## **Comment 201 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Nancy  
Last Name: Pauken  
Email Address: npauken@yahoo.com  
Affiliation:

Subject: Stop rewarding mono-cropping, and factory farming/ranching  
Comment:

What we need to stop is pollution, whether it be from private jets, yachts, McMansions, golf courses, the military, industry and factory farming. The predatory class, industry and the military cause the vast majority of the pollution that poisons us and our environment, yet they are all exempt from the ridiculous "carbon" standards foisted on the rest of us, and yet our tax dollars subsidize what little mitigation is actually done toward cleanup. There is no reason why Air Force One should run 24-7, which creates gawd-knows how much pollution.

If anyone in government or our regulatory agencies (mostly staffed by a revolving door of executives and lobbyists), actually cared about us (they don't), our tax dollars would subsidize regenerative, humane, organic, biodynamic, local, small-scale farming and ranching, which would go a long way to restoring the soil and cleaning up the environment. And, we would severely punish industrial polluters, where the executives would be criminally prosecuted and spend time with rank and file criminals in prison, and not some Club Fed where they play golf all day.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-20 11:03:55

No Duplicates.

## **Comment 202 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: DENIZHAN  
Last Name: BAYTUG  
Email Address: dbaytug@gmail.com  
Affiliation: EMC Cement

Subject: Suggested LCFS Amendments (2024)  
Comment:

Dear Board:

We are thankful for the opportunity offer-up our suggestions towards deploying the LCFS to meet the aims of SB 596 (Becker), namely empowering the deployment of zero-carbon low-energy electrification technologies.

The Annex demonstrates that with minimal rule changes, the LCFS could be easily innovated to support Title XVII by way of example. If you require the Annex in Word format, please advise.

Thank you again for the opportunity to submit.

Yours faithfully

Denizhan Baytug  
Corporate Counsel    EMC Cement BV

Attachment: 'www.arb.ca.gov/lists/com-attach/6864-lcfs2024-VzIFbIIwWFRSNwZn.pdf'

Original File Name: EMC\_CA\_Letter\_CARB\_Re LCFS 2024 changes\_02.20.24\_ex.pdf

Date and Time Comment Was Submitted: 2024-02-20 11:17:09

No Duplicates.

**Comment 203 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Robert  
Last Name: Hambrecht  
Email Address: rhh@allotropepartners.com  
Affiliation: Allotrope Partners LLC

Subject: CARB LCFS Rulemaking Comment Letter  
Comment:

See attached. Thank you for the opportunity to comment on these important issues.

Attachment: 'www.arb.ca.gov/lists/com-attach/6865-lcfs2024-AmNVMABIWWkFXARn.pdf'

Original File Name: ACDC CARB Comment Letter Feb 20 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 11:36:58

No Duplicates.

**Comment 204 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Helen  
Last Name: Kemp  
Email Address: hkemp@3degreesinc.com  
Affiliation: 3Degrees Group Inc.

Subject: 3Degrees Comments on LCFS  
Comment:

Please see the attached file for our feedback on the proposed LCFS regulation. Thank you!

Attachment: 'www.arb.ca.gov/lists/com-attach/6866-lcfs2024-UmFTMQFIUGQLfwZj.pdf'

Original File Name: 3Degrees Comments on LCFS 2024 Formal Rulemaking.pdf

Date and Time Comment Was Submitted: 2024-02-20 11:39:16

No Duplicates.



**Comment 205 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Brian

Last Name: Jennings

Email Address: bjennings@ethanol.org

Affiliation: American Coalition for Ethanol

Subject: Comments on 2024 Proposed Amdts to Calif LCFS

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6867-lcfs2024-UDFXMIQwU19SNwBv.pdf'

Original File Name: ACE Comments Calif LCFS Proposed Amendments 2.20.24.pdf

Date and Time Comment Was Submitted: 2024-02-20 11:46:04

No Duplicates.

**Comment 206 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Andrew

Last Name: Dick

Email Address: Andrew.Dick@electrifyamerica.com

Affiliation: Electrify America

Subject: Electrify America comments on LCFS Proposed Amendments

Comment:

Thank you for the opportunity to comment. Please find our letter attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6868-lcfs2024-UTRUPIA0V2dXJQI7.pdf'

Original File Name: Electrify America Comments on 2024 LCFS Amendments 45-Day.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:04:06

No Duplicates.

**Comment 207 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Paul

Last Name: Wilkins

Email Address: pwilkins@eh2.com

Affiliation: Electric Hydrogen

Subject: Electric Hydrogen Comments on Proposed 2024 LCFS Amendments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6869-lcfs2024-AGVUPgZiAjIFd1cl.pdf'

Original File Name: Electric Hydrogen LCFS Comments Final .pdf

Date and Time Comment Was Submitted: 2024-02-20 12:16:35

No Duplicates.

**Comment 208 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jo  
Last Name: Thapa  
Email Address: jthapa@ajw-inc.com  
Affiliation: AJW Inc

Subject: Comments on the Proposed Amendments to California's Low Carbon Fuel Standard  
Comment:

Hello,  
I am submitting comments on behalf of DTE Vantage to Chair Randolph and Members of the California Air Resources Board. DTE Vantage appreciates the opportunity to provide the agency with these comments and commends CARB for its efforts and dedication to this program and amendment process.

DTE Vantage welcomes any opportunity to meet with the agency or provide any follow-ups should there be any questions regarding the outlined recommendations. Thank you for your time and consideration.

Best,  
Jo  
On behalf of DTE Vantage

Attachment: 'www.arb.ca.gov/lists/com-attach/6870-lcfs2024-ADJVZ1ZnAGFSZgAw.pdf'

Original File Name: 240220\_DTE Vantage Draft Comments LCFS Proposal vSubmission.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:08:15

No Duplicates.

**Comment 209 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Catherine  
Last Name: Garoupa  
Email Address: catherine@calcleanair.org  
Affiliation: EJAC + CVAQ

Subject: EJAC Low Carbon Fuel Standard Recommendations  
Comment:

Please see the attached document.

Attachment: 'www.arb.ca.gov/lists/com-attach/6871-lcfs2024-UTQHawBgWGgAWQdr.pdf'

Original File Name: EJAC LCFS Comments\_2.20.24.docx.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:22:27

No Duplicates.

**Comment 210 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Andy  
Last Name: Foster  
Email Address: andy.foster@aemetis.com  
Affiliation: Aemetis, Inc.

Subject: Comments on LCFS/ISOR  
Comment:

Please find attached comments from Aemetis, Inc. on CARB's proposed amendments (Proposed Rule) to the LCFS and associated ISOR.

Thank you for your consideration.

Attachment: 'www.arb.ca.gov/lists/com-attach/6872-lcfs2024-VzRSNVUmAjMKU1Mj.pdf'

Original File Name: CARB\_Proposed Rule\_Aemetis Comments\_Final 02202024.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:26:38

No Duplicates.

**Comment 211 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Holly

Last Name: Mayton

Email Address: maytonholly@johndeere.com

Affiliation: Deere & Co.

Subject: Comments on Proposed CA LCFS Amendments from John Deere

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6873-lcfs2024-BTcGMAMwVTUDKwAw.pdf'

Original File Name: 2023.02 Deere Comment on CARB LCFS Amendments\_Final.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:33:38

No Duplicates.

**Comment 212 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Steve  
Last Name: Forde  
Email Address: steve.forde@adm.com  
Affiliation: ADM

Subject: ADM Comments to LCFS Proposed Amendments  
Comment:

Attached, please find comments as submitted by ADM.

Attachment: 'www.arb.ca.gov/lists/com-attach/6874-lcfs2024-VzZdP1Q4UFwGbAhr.pdf'

Original File Name: ADM LCFS Comments February 20 2024 FINAL.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:37:24

No Duplicates.



**Comment 213 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Ryan  
Last Name: Clink  
Email Address: ryan.clink@hexagongroup.com  
Affiliation:

Subject: LCFS Amendments Response  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6875-lcfs2024-BmVdOgNwV2YGXwNv.pdf'

Original File Name: CARB LCFS 2 20.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:39:19

No Duplicates.

**Comment 214 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Monte

Last Name: Shaw

Email Address: mshaw@iowarfa.org

Affiliation:

Subject: Comments to CARB regarding potential changes to the Low Carbon Fuel Standard  
Comment:

See attachment for full comments from Iowa Renewable Fuels  
Association.

Attachment: 'www.arb.ca.gov/lists/com-attach/6876-lcfs2024-UjEHYF0uBTRQCVd6.pdf'

Original File Name: CARB - LCFS Amendments Comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:39:19

No Duplicates.

**Comment 215 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Nataley  
Last Name: Williams  
Email Address: nwilliams@catf.us  
Affiliation: CATF

Subject: CATF Comment Letter\_CARB LCFS Amendments  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6878-lcfs2024-UzAGYVAIBzIBWFIx.pdf'

Original File Name: CATF Comment Letter\_CARB LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:46:26

No Duplicates.

**Comment 216 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Kye  
Last Name: Whitmore  
Email Address: kwhitmore@UCSUSA.org  
Affiliation: Union of Concerned Scientists

Subject: 1,350 Public Comments, Notice of Public Hearing to Consider Proposed LCFS  
Amendments

Comment:

February 20, 2024

Dear Recipient,

I am submitting public comments from members of the 'Union of Concerned Scientists' in response to the Notice of Public Hearing to Consider Proposed Low Carbon Fuel Standard Amendments. Enclosed are 1,350 messages, 138 of which came from UCS Science Network members who are pursuing advanced degrees in science, public, economics, and engineering.

Thank you for your consideration.

Sincerely  
Kye Whitmore  
Western States Campaign Coordinator  
Union of Concerned Scientists

Attachment: 'www.arb.ca.gov/lists/com-attach/6879-lcfs2024-VCEHb1Y+V2sGb1QL.pdf'

Original File Name: Union of Concerned Scientists, LCFS Feb 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:52:02

No Duplicates.

**Comment 217 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Molly

Last Name: Armus

Email Address: marmus@foe.org

Affiliation: Friends of the Earth U.S.

Subject: FOE Comment - Proposed Low Carbon Fuel Standard Amendments

Comment:

Please find attached a comment on behalf of Friends of the Earth U.S. and our members and supporters on the proposed Low Carbon Fuel Standard amendments. Thank you for your consideration.

Attachment: 'www.arb.ca.gov/lists/com-attach/6880-lcfs2024-VDJUPVUxB3IWMwdo.pdf'

Original File Name: FOE-Comment-CARB\_LCFS\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:47:19

No Duplicates.

**Comment 218 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Jesse  
Last Name: Holman  
Email Address: senergyoilag@gmail.com  
Affiliation: Senergy, LLC

Subject: Supplemental to Consider Innovative Production Method Lowers CI >60%  
Comment:

Please find a supplemental to a previous added comment #24, posted 2024-02-06 12:36:37, where we kindly request consideration of adding to CCR Section 95489(c)(1)(A), Chemistry Replace Steam, as an innovative production method. This will incentive crude producers to stop using steam to extract heavy oil, reducing emissions in California's most disadvantaged communities while reducing overall fossil fuel demand.

Thank you, Jesse

Attachment: 'www.arb.ca.gov/lists/com-attach/6881-lcfs2024-WjkGYVUmV2ZXMgRs.pdf'

Original File Name: CARBchemistrySupplement.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:45:00

No Duplicates.

**Comment 219 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Scott  
Last Name: Hochberg  
Email Address: [shochberg@biologicaldiversity.org](mailto:shochberg@biologicaldiversity.org)  
Affiliation: Center for Biological Diversity

Subject: Comment from Center for Biological Diversity  
Comment:

Hello,

Please find attached comments on behalf of the Center for Biological Diversity. Copies of the references cited in the comment are available for download at the following link:  
<https://diversity.box.com/s/8jcli9f2vwyof9cbq1qx5sna1m0d0hsb>

Thank you and please reach out if you have any questions.

Attachment: 'www.arb.ca.gov/lists/com-attach/6883-lcfs2024-V2VRY1IMAmEEMARb.pdf'

Original File Name: 24 02 20 Center for Biological Diversity Comments on LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:05:35

No Duplicates.

**Comment 220 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Shelby  
Last Name: Neal  
Email Address: shelby.neal@darlingii.com  
Affiliation: Darling Ingredients

Subject: Comments on Proposed LCFS Amendments  
Comment:

Good afternoon,

Please disregard the comment letter I submitted earlier today and post the letter attached to this message. The earlier letter contained a minor error that needed to be clarified.

Thank you for your kind assistance.

Shelby Neal  
VP - Renewables & Energy Policy

Attachment: 'www.arb.ca.gov/lists/com-attach/6884-lcfs2024-UTVVMgR3BToGaQFv.pdf'

Original File Name: Darling Comments on LCFS package FINAL 2-20-2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:04:40

No Duplicates.



## **Comment 221 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Roxana

Last Name: Bekemohammadi

Email Address: roxana@ushydrogenalliance.org

Affiliation:

Subject: Proposed 2024 LCFS Amendments

Comment:

Dear California Air Resources Board,

We appreciate the opportunity to share our thoughts on California Air Resources Board's Low Carbon Fuel Standard amendments. The United States Hydrogen Alliance is a non-profit trade association dedicated to building the U.S. hydrogen economy. Our organization represents hydrogen companies actively deploying clean technologies across the country.

We are writing to share our perspective on several key program areas for your consideration. These requests address the light duty hydrogen refueling infrastructure pathway, low carbon intensity electricity, methane pyrolysis, along with recommendations for pyrolysis and renewable hydrogen definitions.

Regarding the new light duty hydrogen refueling infrastructure pathway, we believe the location restrictions to disadvantaged communities, low-income communities, and rural areas is overly limiting. While we respect the intent of these restrictions, we ask for removal of the hydrogen refueling station location restrictions to allow alignment with traffic/use forecasts to ensure high usage and maximum societal benefit and to avoid applying a double standard for hydrogen, a zero emission fuel, in comparison to electricity.

New restrictions for low carbon intensity electricity require it to be supplied by new or expanded production, or within three years of a hydrogen production facility or air capture project's creation date. These restrictions resemble "additionality" or "incrementality," and is something the hydrogen industry is opposed to on all accounts. We suggest the removal of the new 100% renewable electricity requirement given the policy bias for electricity against hydrogen, as battery electric vehicles are not required to charge with 100% renewable electricity. Through California's Renewables Portfolio Standard, it is already required for retail electricity to be 100% renewable by 2045; with the grid already moving in this direction, this requirement seems redundant.

For the definition of pyrolysis we suggest two amendments, the inclusion of both biomethane and solid carbon. We believe that solid carbon should be considered as a form of carbon capture and sequestration. Methane pyrolysis should also be included in a pathway for flexible access to low greenhouse gas methane sources to reduce both greenhouse gasses and the cost of hydrogen. We also

suggest an amendment to the definition of renewable hydrogen to include pyrolysis in section two.

In section § 95490. Provisions for Fuels Produced Using Carbon Capture and Sequestration, we suggest adding the eligibility requirement below:

(3) "Hydrogen producers from methane pyrolysis that capture precombustion carbon in solid form and permanently store it or provide proof of permanent storage. 1kg of solid carbon is equivalent to 3.67kg of avoided carbon dioxide"

We at the United States Hydrogen Alliance thank you for your time and consideration. Please reach out to us if you have any questions.

Respectfully,

Roxana Bekemohammadi  
Founder and Executive Director  
United States Hydrogen Alliance

Attachment: 'www.arb.ca.gov/lists/com-attach/6885-lcfs2024-ViNQJVA5WWtXDIU5.pdf'

Original File Name: USHA LCFS Letter\_Signed\_022024.pdf

Date and Time Comment Was Submitted: 2024-02-20 12:58:39

No Duplicates.

## **Comment 222 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Nikita  
Last Name: Pavlenko  
Email Address: n.pavlenko@theicct.org  
Affiliation: ICCT

Subject: ICCT Comments on LCFS Amendments  
Comment:

The attached PDF contains comments submitted by the International Council on Clean Transportation (ICCT). The ICCT is an independent nonprofit organization founded to provide unbiased research and technical analysis to environmental regulators. Our mission is to improve the environmental performance and energy efficiency of road, marine, and air transportation, in order to benefit public health and mitigate climate change. We promote best practices and comprehensive solutions to increase vehicle efficiency, increase the sustainability of alternative fuels, reduce pollution from the in-use fleet, and curtail emissions of local air pollutants and greenhouse gases (GHG) from international goods movement.

The ICCT welcomes the opportunity to provide comments on the Air Resources Board's Proposed Low Carbon Fuel Standard amendments. We commend the agency for its technical analysis and interest in continuing to improve the effectiveness of one of its flagship climate programs. Based on the content of the Initial Statement of Reasoning (ISOR) document, the comments below offer a number of technical observations and recommendations for ARB to consider in aligning the program with the goals of the 2022 Scoping Plan.

Attachment: 'www.arb.ca.gov/lists/com-attach/6886-lcfs2024-AmsCZwFjACcAWQJu.pdf'

Original File Name: ICCT LCFS Dec 2023 ISOR Comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:10:16

No Duplicates.

**Comment 223 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Miles  
Last Name: Heller  
Email Address: hellermt@airproducts.com  
Affiliation: Air Products

Subject: Comments regarding LCFS 45-day package  
Comment:

We appreciate the opportunity to provide this feedback. Please  
find our comments attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6887-lcfs2024-VDVRPIAjUFwEcGFz.pdf'

Original File Name: Air Products Comments Draft LCFS Regulation final.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:04:39

No Duplicates.

**Comment 224 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Ira  
Last Name: Dassa  
Email Address: ira.dassa@twelve.co  
Affiliation: Twelve Benefit Corporation

Subject: Proposed LCFS Amendments  
Comment:

Please find attached Twelve's comments and our suggested revisions,  
shown in redline, on pages 21 and 149-50 of Appendix A-1.1.

Attachment: 'www.arb.ca.gov/lists/com-attach/6888-lcfs2024-UCRUJQNnVmkBcQht.zip'

Original File Name: Twelve Comments.zip

Date and Time Comment Was Submitted: 2024-02-20 13:06:59

No Duplicates.

**Comment 225 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Steve  
Last Name: Compton  
Email Address: [steve@sevanabioenergy.com](mailto:steve@sevanabioenergy.com)  
Affiliation: Sevana Bioenergy

Subject: LCFS ISOR Comments  
Comment:

Please find our comments attached.

Attachment: '[www.arb.ca.gov/lists/com-attach/6889-lcfs2024-AXIGZVEmUmBROQNi.pdf](http://www.arb.ca.gov/lists/com-attach/6889-lcfs2024-AXIGZVEmUmBROQNi.pdf)'

Original File Name: Sevana CARB\_Comments 02\_10\_2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:23:09

No Duplicates.

**Comment 226 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Brian

Last Name: McDonald

Email Address: bcmcdonald@marathonpetroleum.com

Affiliation: MPC

Subject: LCFS Regulation Comments

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6890-lcfs2024-B2RXMFwvWWgKU1c7.pdf'

Original File Name: CARB LCFS Proposed Regulation Comments\_45 day.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:36:46

No Duplicates.

**Comment 227 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Todd  
Last Name: Trauman  
Email Address: todd@usefuse.com  
Affiliation: FuSE

Subject: FuSE Comments on 2024 Rulemaking Proposed LCFS Amendments  
Comment:

Please find attached comments to the 2024 Proposed LCFS amendments.

Attachment: '[www.arb.ca.gov/lists/com-attach/6891-lcfs2024-BmBSIQByWG5XDgJh.pdf](http://www.arb.ca.gov/lists/com-attach/6891-lcfs2024-BmBSIQByWG5XDgJh.pdf)'

Original File Name: FuSE Comments CA LCFS Rulemaking February 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:40:19

No Duplicates.



**Comment 228 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Samantha

Last Name: Bourke

Email Address: samanthabourke@prairiefarms.com

Affiliation: Prairie Farms Dairy

Subject: Comments to CARB

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6892-lcfs2024-WmoCNIZmVzIGMIBk.pdf'

Original File Name: 021624 Comments on the Proposed Amendments to the LCFS.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:45:02

No Duplicates.

**Comment 229 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Matthew  
Last Name: Rekeweg  
Email Address: matt.rekeweg@corteva.com  
Affiliation: Corteva Agriscience

Subject: Comments on Proposed Low Carbon Fuels Standard Amendments (lcfs2024)  
Comment:

Please see the uploaded attachment for comments on the Proposed Low Carbon Fuels Standard Amendments from Corteva Agriscience.

Attachment: 'www.arb.ca.gov/lists/com-attach/6893-lcfs2024-AmFdOgBzUGEKUwVp.pdf'

Original File Name: CARB LCFS Amendments comments - Corteva Agriscience.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:23:38

No Duplicates.

**Comment 230 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jennifer

Last Name: LeRow

Email Address: jlerow@brayafuels.com

Affiliation: Braya Renewable Fuels (Newfoundland) LP

Subject: Braya Comments to CARB RE Proposed Changes to the LCFS

Comment:

Dear CARB,

Thank you very much for taking the time to consider our comments concerning the upcoming amendments proposed under the LCFS.

Jennifer LeRow

Braya Renewable Fuels (Newfoundland) LP

Attachment: 'www.arb.ca.gov/lists/com-attach/6894-lcfs2024-VzVcKfW8VX8FYghX.pdf'

Original File Name: Braya Comments to CARB RE Proposed Changes to the LCFS  
02.20.24.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:46:12

No Duplicates.

**Comment 231 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Victoria  
Last Name: Bogdan Tejada  
Email Address: vbogdantejada@biologicaldiversity.org  
Affiliation: Center for Biological Diversity

Subject: Opposition to allowing fossil fuels + CCS to extend past 2040 phase-out  
Comment:

Please find a letter attached and signed by nearly 50 groups expressing their strong opposition to the proposed LCFS amendment that would allow petroleum projects using carbon capture and storage (CCS) to continue to generate credits beyond the phase-out date of December 31, 2040. This amendment creates a dangerous loophole that relies on a so-called climate solution that is anything but; the result will be California incentivizing and perpetuating the climate catastrophe and the health and environmental harms that come with it.

Attachment: 'www.arb.ca.gov/lists/com-attach/6896-lcfs2024-BjQGNFJ9VzRQZAUr.pdf'

Original File Name: 24.02.20 CCS LCFS Loophole Final Sign-on.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:52:49

No Duplicates.

**Comment 232 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: David  
Last Name: Edwards  
Email Address: david.edwards@airliquide.com  
Affiliation: Air Liquide

Subject: Air Liquide Comments on Proposed Low Carbon Fuel Standard Ammendments  
Comment:

Please see attached comment letter

Attachment: 'www.arb.ca.gov/lists/com-attach/6897-lcfs2024-AjBTZQc0VjFWfQU1.pdf'

Original File Name: 2024-02-19 LCFS Comments - Air Liquide.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:54:00

No Duplicates.

**Comment 233 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Evan

Last Name: Neyland

Email Address: [evan.neyland@chargepoint.com](mailto:evan.neyland@chargepoint.com)

Affiliation: ChargePoint

Subject: ChargePoint comments on Dec 2023 LCFS amendments

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6899-lcfs2024-VzQHaQFhV3YKawJn.pdf](http://www.arb.ca.gov/lists/com-attach/6899-lcfs2024-VzQHaQFhV3YKawJn.pdf)'

Original File Name: ChargePoint Comments to Dec 23 LCFS Proposed Amendments.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:59:42

No Duplicates.

**Comment 234 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Duncan  
Last Name: Coneybeare  
Email Address: d.coneybeare@hiroc.com  
Affiliation: HiiROC Ltd

Subject: Staff Report: Initial Statement of Reasons - response from HiiROC Ltd  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6900-lcfs2024-AHBUIFA+WXpROAJx.pdf'

Original File Name: Proposed Low Carbon Fuel Standard Amendments (lcfs2024)\_HiiROC Response\_20220220.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:59:46

No Duplicates.

**Comment 235 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: John  
Last Name: Steelman  
Email Address: jsteelman@catf.us  
Affiliation: Deputy Director, Transportation Decarbon

Subject: Comments on potential changes to LCFS  
Comment:

Submitting comments on behalf of the Clean Air Task Force and Pacific Environment on the proposed revisions to the LCFS. Please let us know if you have any questions.  
Thank you,  
John Steelman  
Deputy Director, Transportation Decarbonization  
Clean Air Task Force

Attachment: 'www.arb.ca.gov/lists/com-attach/6901-lcfs2024-AmEAZ1MmU2YEXVMY.docx'

Original File Name: CATF and Pacific Environment Joint Comments\_CARB LCFS Amendments.docx

Date and Time Comment Was Submitted: 2024-02-20 13:56:45

No Duplicates.



**Comment 236 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Joseph

Last Name: Boyd

Email Address: joseph.boyd@denaliwater.com

Affiliation:

Subject: IWP comments on proposed rule

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6903-lcfs2024-BTcGMAMwBGMBWFUn.pdf'

Original File Name: 2024 rule comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:59:25

No Duplicates.

**Comment 237 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Tom  
Last Name: Van Heeke  
Email Address: tvanheeke@rivian.com  
Affiliation: Rivian Automotive

Subject: Comments on the ISOR for the Proposed Low Carbon Fuel Standard Amendments  
Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6904-lcfs2024-AXMAbwF2WGIHYANt.pdf'

Original File Name: Rivian\_CommentsISOR2024\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-02-20 14:02:14

No Duplicates.

**Comment 238 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Greg

Last Name: Kester

Email Address: gkester@casaweb.org

Affiliation: California Assoc of Sanitation Agencies

Subject: Comments on LCFS Program

Comment:

Please find attached comments from the California Association of Sanitation Agencies on the proposed revisions to the LCFS program.

Attachment: 'www.arb.ca.gov/lists/com-attach/6905-lcfs2024-BzVWfVFiUzBVfgAy.pdf'

Original File Name: 2-20-24 CASA LCFS Comment Letter.pdf

Date and Time Comment Was Submitted: 2024-02-20 14:02:05

No Duplicates.

**Comment 239 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Chirag  
Last Name: Bhakta  
Email Address: cbhakta@fwwatch.org  
Affiliation: Food & Water Watch

Subject: LCFS Rulemaking  
Comment:

Please find attached a letter from more than 160 groups from 25 states and the District of Columbia calling on Governor Newsom and the California Air Resources Board (CARB) to reconsider proposed rulemaking that doubles down on polluting factory farm biogas as the most lavishly incentivized transportation fuel under the state's Low Carbon Fuel Standard (LCFS).

Thank you,

Attachment: 'www.arb.ca.gov/lists/com-attach/6906-lcfs2024-VTIWMwZhBSUAKwlm.pdf'

Original File Name: LCFS-Org-Sign-On-Letter-\_Formatted-2.pdf

Date and Time Comment Was Submitted: 2024-02-20 14:09:20

No Duplicates.

## **Comment 240 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Evan

Last Name: Neyland

Email Address: evan.neyland@chargepoint.com

Affiliation: ChargePoint

Subject: ChargePoint comments on Dec 2023 LCFS amendments

Comment:

February 20, 2024

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: ChargePoint Comments on Proposed Low Carbon Fuel Standard Amendments

Thank you for the opportunity to submit comments on the proposed amendments to the Low Carbon Fuel Standard (LCFS) issued on December 19, 2023. ChargePoint has reviewed the Proposed Regulation Order and appreciates the work of the California Air Resources Board (CARB) Staff to implement changes to LCFS that will advance investment in low carbon fuels and infrastructure in California.

About ChargePoint

Since 2007, ChargePoint has been committed to making it easy for businesses and drivers to go electric with one of the largest electric vehicle (EV) charging networks and a comprehensive portfolio of charging solutions. ChargePoint's cloud subscription platform and software defined charging hardware is designed internally and includes options for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, corridor, and fleets of all kinds.

Summary of comments

- Expand the scope of "less intensive verification" for on-road electricity crediting to allow for networked charging stations that meet certain requirements to be pre-approved. Entities that do not meet the requirements for less intensive verification could still undergo full verification.
- Remove the exemption for dedicated parking spaces under multifamily crediting and allow owner/operators to claim credits on all stations at multifamily locations.
- Regarding the MHD-FCI provision: (1) relax the siting requirement to within 5 mi of a FHAA corridor, (2) reduce the minimum kW nameplate capacity to 200, (3) consider shortening the FCI crediting window to 7 years, and (4) roll unutilized LD-FCI capacity into the MHD-FCI provision to increase deployments.
- Take greater action to stabilize the credit market, either through supply-side intervention or more stringent carbon intensity targets. Increase the step down to 10%.

- Modify the Automatic Acceleration Mechanism (AAM) formula to trigger once the credit bank exceeds three-fifths of the prior year's deficits, instead of three-fourths.

#### Requirements for less intensive verification

The inclusion of on-road electricity crediting in the verification program is not a small lift and needs to be done thoughtfully. Therefore, we suggest CARB consider putting off including electricity verification in this rulemaking given the many other issues being considered. However, if CARB believes that on-road electricity reports must undergo third-party verification under the amended regulation due to largescale risk of misreporting (which to our knowledge, there is currently no evidence of), CARB should lean on existing technology, standards and relevant regulations when designing verification. To that end, we appreciate CARB's inclusion of a "less intensive verification" pathway in the proposed rules but believe that this does not go far enough. The less intensive verification pathway should be expanded to consider the following:

The EV charging network is fundamentally different than the traditional point-source liquid fuel supply network: whereas liquid fuels originate from fewer and larger sources (refineries), EV charging stations are significantly more disaggregated, where each point (or charger) in the network represents a small amount of potential fuel supply which renders physical site visits across the whole network impractical and costly. For meter accuracy assurance, CARB should instead lean on accuracy thresholds that already exist in the industry, such as those within the California Type Evaluation Program (CTEP), which require that level 2 (L2) EV charging meters meet an accuracy threshold of  $\pm 1\%$  upon manufacturing and calibration and  $\pm 2\%$  over its useful life, while level 3 (L3) meters must meet a  $\pm 2.5\%$  accuracy upon manufacturing and calibration and  $\pm 5\%$  over its useful life. The CTEP standard is already being utilized by the California Division of Measurement Standards (DMS), the entity tasked with ensuring the accuracy of commercial devices, including EV charging stations. DMS sets standards to promote fair competition and ensure consumer protection and points to the CTEP as the metrological accuracy standard that chargers installed after a certain date must meet to be used for commercial purposes. County Weights & Measures offices, under the guidance of statewide rules established by DMS, serve to enforce the standards by conducting periodic site visits to verify the accuracy of fueling stations.

Recommendation: CARB should pre-approve charging stations that meet CTEP's meter accuracy standards for participation under the less intensive verification pathway.

Pre-approval would mean exempting eligible charging station models from site visits and third-party meter testing based on that model's meter accuracy substantiation. CARB could publish a list of exempt charging station models that meet CTEP's meter accuracy standards for credit generators' reference. This is similar to the approach taken under Canada's national Clean Fuels Regulation. Otherwise, the existence of the DMS framework for assessing and enforcing charger accuracy would render additional site visits and meter testing, even only in half of the years as currently proposed

under the "less intensive verification" pathway, under the LCFS program duplicative and punitive on the industry, particularly for small owner/operators .

With assurances around charging station meter accuracy ensured by the accuracy standards embedded in CTEP, the final step to less intensive verification would be a "desktop" review of the data in the reports. The scope of the desktop review would be to ensure that the data in the quarterly reports submitted through the LRT matches the data that was output from the charging network. EV charging networks are underpinned by extremely accurate (down to the watt-hour), real-time data in a way that traditional liquid fuel networks are not . Networked EV charging provides a near constant stream of data that can be verified against reported charging activity.

There are a number of standards, practices, technologies and processes charging network operators adhere to to ensure the accuracy of data. For example, ChargePoint complies with several standards to ensure that the data reported by the station maintains its accuracy as it is transferred from the station to the cloud, and that any data anomalies are detected and removed before being reported. Many network operators also maintain compliance with Payment Card Industry Data Security Standards (PCI DSS) to ensure an accurate and secure environment for network transaction data. CARB could pre-approve networks that meet certain standards for use under the less intensive verification pathway, similar to pre-approving charging station models based on meter accuracy. Standards and documents required for pre-approval could include SOC2 reports and/or PCI certification.

Our recommendations for the less intensive verification pathway are not necessarily meant to be prescriptive, but rather to point out how existing technologies, best practices, and standards already widely adopted in the industry should be incorporated into the pathway. This will greatly minimize administrative costs for an industry that is still scaling. This is also the general approach taken under Canada's national program. We urge CARB to not try and reinvent the wheel re: on-road electricity verification. Reporting entities that do not meet the requirements for less intensive verification would still be able to undergo full verification.

Credits for non-residential chargers at multi-family residential properties.

ChargePoint strongly supports the proposal to allow FSE owners to generate credits for stations installed at multifamily properties. This change will create more revenue opportunities for property owners that install chargers at multifamily locations, and critically, incentivize more deployment of chargers for residents of multifamily homes, a market segment that has historically lacked investment.

Recommendation: remove the exemption for dedicated parking spaces and allow owner/operators to claim credits at all multifamily locations.

While we fully support the proposal to treat multifamily crediting the same as non-residential, we do not agree with the proposal to treat chargers in dedicated parking spaces differently. Not only will the exclusion of restricted parking spaces be extremely difficult to track, but it also arbitrarily distinguishes credit generation based on a residence's parking arrangement. Recent

analysis by the CEC indicates that expanding the range of charging options available in the parking lots of multifamily housing will ensure charging is not a barrier to EV adoption. Increasing home charger access for residents of multifamily homes must be a priority to equitably meet the routine charging needs of more EV drivers, and for this reason, we strongly support this change by CARB.

Residents of multifamily housing are generally not able to install conventional home charging without financial assistance from the building owner. This is because charger installation at multi-family properties often requires upgrades to shared electrical panels and running conduit across common parking areas. A single household of a multifamily residence is generally unable or unwilling to shoulder the high cost of charger installation themselves. In other words, there is a "split incentive" affecting multifamily properties in which a property owner must pay for and organize installation, while the chargers may only benefit the fraction of residents who drive EVs at the time of the upgrade.

In fact, there is a case to be made that chargers in dedicated multifamily residential parking places may have the most impact on those residents switching to electric and should therefore be supported by the LCFS through the ability to generate value from credit generation. This is especially true considering CARB's proposal to redirect funds from the Clean Fuel Reward (CFR) program towards MHD EVs (which we also strongly support). Whereas before, CFR value was generated by residential (including multifamily) charging so it made sense to return some of that value to individual EV drivers via LD EV rebates. If CFR value will now go towards MHD EV rebates, it only seems right to allow owner/operators of multifamily chargers to retain the value of the LCFS which can help finance or buy down the cost of the station.

Medium and heavy duty (MHD) Fast Charging Infrastructure (FCI) credits

ChargePoint strongly supports the addition of the MHD FCI provision. While the passage of the Advanced Clean Fleets and Advanced Clean Trucks regulations are expected to create greater demand for MHD EVs, infrastructure development to support these vehicles remains economically challenging due to the lack of MHD vehicles on the road today and the expectation that it will take time for the market to grow. The expansion of FCI credits for both private and shared MHD FCI is a much-needed intervention to commercialize charging infrastructure and help stimulate investment for this segment. ChargePoint also appreciates the inclusion of shared private fleet chargers in this program. Nonetheless, a few revisions to the rules for MHD FCI credits will allow the program to support the nascent MHD refueling market more effectively.

Charging hubs for MHD vehicles are likely to require several megawatts of power for each site. These projects will in most cases require significant distribution grid upgrades by the utility. Due to the complex factors that inform site selection for MHD charging sites, including but not limited to access to travel corridors, proximity to vehicle routes, distribution grid capacity, and land acquisition, it remains unclear which locations will be the most efficient to locate private or shared MHD charging hubs. For this reason, overly narrow location requirements for MHD FCI sites may impede development by eliminating projects that would otherwise be ideal due to ample grid capacity. While we understand CARB's intent



for the FCI program to focus charger deployment in alternative fuel corridors for the purposes of accessibility and equity, station owners and drivers would benefit from less stringent geographic limitation.

Recommendation: relax the geographic siting requirement to 5 mi from a FHAA fuel corridor to provide flexibility for site selection.

The amendment proposal establishes a minimum power level of 250 kW for chargers serving sites that receive MHD FCI credits. The minimum power level established for MHD-FCI sites should consider today's MHD fleet needs, as well as the anticipated needs of the future. For most MD vehicles on the road today, 200 kW is more than sufficient for the vehicle's needs and helps lower overall system costs (relative to 250 kW or greater). Therefore, ChargePoint recommends that CARB reduce the minimum power level for each charger serving MHD FCI to 200 kW, as this minimum is sufficient to meet the market where it is today, as well as accommodate the needs of coming MHD vehicles.

Recommendation: reduce the minimum kW eligibility requirement to 200 from 250.

Regarding the MHD-FCI crediting window, while some sites will need a 10-year window to recoup capital costs, a longer window could encourage overbuilding and disincentivize utilization in the short to mid-term, both of which are not ideal for the market. We believe a crediting window closer to 7 years will suffice for the majority of projects and encourage sites to build for utilization sooner rather than later. This should also free up more capacity under the MHD-FCI cap sooner which will open up capacity for more sites over time.

Recommendation: consider shortening the MHD-FCI crediting window to 7 years.

The CEC reports that as of 2023, California has over 9,000 DCFC ports in operation and is ahead of schedule to meet its port deployment target of 10,000 ports by 2025. ChargePoint believes LD FCI revenue has successfully accelerated investment in the market for public DCFC and is partly responsible for the state's success in this segment. When paired with the continued growth of LD EV sales in California, it seems clear that continued investment in LD-FCI can sustain itself without greater support from FCI credits. By contrast, the MHD segment would benefit from greater FCI support because it is underdeveloped relative to the state's goals. The CEC estimates that by 2030, California's 155,000 MHD EVs will need about 114,500 public and shared chargers.

To further accelerate the market for MHD electrification, we recommend CARB rollover any unused LD-FCI credits into the MHD cap to allow for greater investment/deployments in this segment (more on this below).

Revised Clean Fuel Reward Program

ChargePoint supports the proposal to redirect funds from the CFR program to make MHD EVs more cost-effective. The current framework of allocating CFR funds towards LD EV rebates has long since lost efficacy as the rebate amount is not salient to prospective EV drivers to the point where it induces additional purchases.

ChargePoint is pleased to see this change as the current state of the MHD EV market is more in need of funding than the LD segment.

#### Light duty FCI credits

The proposed regulation establishes a transition plan to reduce FCI crediting available for LD DCFC applicants. Among other changes, the proposal amends the cap for LD FCI credits to 0.5% of prior quarter deficits, a reduction from the previous cap of 2.5%. ChargePoint supports this change and agrees that LD-FCI credits should be capped to no more than 0.5% to focus infrastructure crediting on the more nascent MHD EV market. As discussed previously, ChargePoint believes MHD-FCI should be the priority and recommends CARB consider further reduction in the availability of LD-FCI credits in favor of a higher cap on MHD-FCI credits.

Should the LD-FCI pathway remain open beyond 2025, ChargePoint believes it would be premature to limit eligibility to stations with a nameplate capacity of 150 kW or more in light of the other proposed changes to the pathway. A station capacity minimum of 150 kW combined with the change to how FCI charging capacity is calculated as well as the extension of the crediting timeline to 10 years will together incentivize overbuilding sites without regard to utilization solely because of FCI credits.

#### New carbon intensity benchmarks

In the weeks following CARB's release of its amendment package in mid-December, the spot market for credit prices declined ~20% (falling from \$70/credit to a low of \$57/credit). In that time, the market incorporated CARB's proposal of a 30% carbon intensity (CI) target by 2030, along with the proposed changes to the supply side, and determined that this market will continue to be oversupplied. Without more ambitious CI targets and/or clearer steps to curb biofuel production with uncertain greenhouse gas benefits (Murphy & Wook, 2024), it is apparent that this market will continue to be oversupplied and credit prices will remain low for the foreseeable future.

In prior conversations with CARB staff, we have come away with the understanding that CARB assumes the LCFS program, and the potential revenue it affords, does not factor into investment decisions for EV project operators (fleets, charging operators, etc.) and therefore investment in EVs and charging infrastructure is agnostic to LCFS credit prices. We do not agree with this assumption. Advanced Clean Cars, Advanced Clean Trucks, and Advanced Clean Fleets do not directly address or fund charging infrastructure. The LCFS program can, and often does, provide an important revenue stream for EV project operators and can be the difference between a project penciling or not. Project developers, operators, and investors in the EV space operate similarly as those in other spaces: they evaluate all available costs and revenues when assessing a potential project and often make decisions based on expected net cashflows. The difference between expected 5-year LCFS revenues on a L2 station with roughly average utilization in a world where credit prices hover in the ~\$60/credit range vs ~\$150/credit is significant. In the former, expected 5-yr LCFS revenues do not amount to enough to influence the business case, whereas in the latter, LCFS revenues offset a significant portion of the cost of the station and can even be leveraged for project financing.

As electrification has the most potential for long-term deep decarbonization of transportation, we urge CARB to account for the impact that sustained low credit prices may have on transportation electrification investments. Without clearer steps to limit crop-based biofuels - or specific carve outs for on-road electricity credits, like how some state Renewable Portfolio Standards set specific carve outs for solar - investments in charging infrastructure and electric fleets will be crowded out under the program by the continued surplus of biofuel credits in the market.

Recommendation: in lieu of some sort of cap on crop-based biofuels, we believe the 2030 CI target needs to be increased to 32.5% to 35% and the stepdown needs to be increased to 10% to raise price expectations to the level needed to usher in more investment.

#### Automatic Acceleration Mechanism (AAM)

ChargePoint supports the proposal to establish the AAM but recommends that CARB make the mechanism stronger. As proposed, the AAM would not have been triggered in any of the years after the 2018 amendments. These years include 2022, a year when the credit market price declined by ~50%. The AAM should be designed specifically to counteract this type of negative price movement, so a mechanism that would not have reacted in 2022 is not strong enough.

To strengthen the mechanism, we recommend that ARB amend the first condition of the AAM to be reached when the cumulative credit bank is greater than three-fifths of the deficits generated over the same calendar year rather than the current condition set at three-fourths. With this update the AAM would have been triggered in 2022 but not any of the other years following the 2018 amendments. Since these other years saw price increases or modest declines, the new threshold suggests a balanced mechanism that reacts only to large price decreases.

#### Conclusion

ChargePoint appreciates the opportunity to submit comments to CARB on the Proposed Regulation. We stand ready to work with CARB Staff to implement the changes discussed in these comments, particularly to ensure that the process of verification is administratively efficient for the on-road charging market.

Respectfully,

Evan Neyland  
Senior Manager, Carbon Markets

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-20 14:08:06

No Duplicates.

**Comment 241 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Richard  
Last Name: DeRose  
Email Address: RDeRose@sjindustries.com  
Affiliation: SJI Renewable Energy Ventures

Subject: Response Comments to Proposed LCFS Amendments  
Comment:

Please accept the attached comments on behalf of Kyle Nolan, COO,  
SJI Renewable Energy Ventures. We look forward to continued  
dialogue.

Attachment: 'www.arb.ca.gov/lists/com-attach/6908-lcfs2024-VCYBbgRmAzgHYAZ0.pdf'

Original File Name: Richard DeRose - SJI Renewable Energy Ventures Response Letter  
2.20.2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 14:10:33

No Duplicates.

**Comment 242 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Dan

Last Name: Bowerson

Email Address: dbowerson@autosinnovate.org

Affiliation:

Subject: Auto Innovators Comments on Proposed LCFS Amendments

Comment:

Please find the attached comments from the Alliance for Automotive Innovation on proposed LCFS amendments.

Attachment: 'www.arb.ca.gov/lists/com-attach/6909-lcfs2024-AWBRIInBztSC1I17.pdf'

Original File Name: Auto Innovators Comments\_CARB LCFS Amendments (February 20 2024).pdf

Date and Time Comment Was Submitted: 2024-02-20 14:20:21

No Duplicates.

**Comment 243 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Bruno  
Last Name: Maier  
Email Address: bruno.maier@raizen.com  
Affiliation:

Subject: Raízen's Contribution to LCFS Amendments 2024  
Comment:

Dear Chair Randolph,

We appreciate the opportunity to comment on the Proposed Low Carbon Fuel Standard (LCFS) Amendments.

Respectfully,

Raízen Team

Attachment: 'www.arb.ca.gov/lists/com-attach/6910-lcfs2024-WzgCZVMgVWRQCQFz.pdf'

Original File Name: CARB\_Rulemaking\_Rai&#769;zens Comments\_20240220.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:42:14

No Duplicates.

**Comment 244 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: lucas

Last Name: Grimes

Email Address: lucas.grimes@resource-solutions.org

Affiliation: Center for Resource Solutions

Subject: Center for Resource Solutions comments on LCFS

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6911-lcfs2024-UzBWlIMhWFQHYgZp.pdf'

Original File Name: CRS Comments to CARB on LCFS updated 2.20.24.pdf

Date and Time Comment Was Submitted: 2024-02-20 14:25:31

No Duplicates.



**Comment 245 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jacqueline  
Last Name: Moore  
Email Address: jm Moore@pmsaship.com  
Affiliation: PMSA

Subject: PMSA comments on LCFS Amendments  
Comment:

Please find attached Pacific Merchant Shipping Association's (PMSA) comments on the proposed Low Carbon Fuel Standard (LCFS) Program amendments.

Attachment: 'www.arb.ca.gov/lists/com-attach/6912-lcfs2024-UyNVPIYkWWsFXFMw.pdf'

Original File Name: PMSA Comments on LCFS Amendments 02.20.2024 Final.pdf

Date and Time Comment Was Submitted: 2024-02-20 13:50:22

No Duplicates.

**Comment 246 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Bang  
Last Name: Phung  
Email Address: bang.phung@ladwp.com  
Affiliation: LADWP

Subject: Los Angeles Department of Water and Power (LADWP) LCFS Comments  
Comment:

Please see attached for LADWP's comments on the LCFS proposal.

Attachment: '[www.arb.ca.gov/lists/com-attach/6914-lcfs2024-UT1dOlcyByMDdQJd.pdf](http://www.arb.ca.gov/lists/com-attach/6914-lcfs2024-UT1dOlcyByMDdQJd.pdf)'

Original File Name: LADWP Comments on 2024 LCFS Proposed Amendments 2.20.2024 signed.pdf

Date and Time Comment Was Submitted: 2024-02-20 14:31:35

No Duplicates.

**Comment 247 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Michael

Last Name: Daley

Email Address: mdaley@carbonsolutionsgroup.com

Affiliation: Carbon Solutions Group

Subject: CSG Comments on the Proposed LCFS Amendments

Comment:

Please find attached comments from Carbon Solutions Group on the proposed LCFS amendments. Thank you for your time and attention.

Attachment: '[www.arb.ca.gov/lists/com-attach/6916-lcfs2024-UDNWMV0uBDUGb1U7.pdf](http://www.arb.ca.gov/lists/com-attach/6916-lcfs2024-UDNWMV0uBDUGb1U7.pdf)'

Original File Name: Carbon Solutions Group\_Comments on the Proposed LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2024-02-20 14:29:57

No Duplicates.

**Comment 248 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Dan  
Last Name: Ress  
Email Address: dress@crpe-ej.org  
Affiliation: Center on Race, Poverty & the Environmen

Subject: Coalition Comment on Direct Air Capture and Enhanced Oil Recovery in the LCFS  
Comment:

Hello,

I'm submitting a letter from environmental justice, environmental, public health, and labor groups requesting that CARB remove direct air capture and enhanced oil recovery using captured carbon from the Low Carbon Fuel Standard.

Please feel free to reach out with any questions.

Wishing you well,

Dan Ress

Attachment: 'www.arb.ca.gov/lists/com-attach/6917-lcfs2024-VDgAZVA3BCQKU1Q3.pdf'

Original File Name: LCFS Comment Letter, 2.20.24.docx.pdf

Date and Time Comment Was Submitted: 2024-02-20 14:39:55

No Duplicates.

**Comment 249 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Sam

Last Name: Wade

Email Address: sam@rngcoalition.com

Affiliation: Coalition for Renewable Natural Gas

Subject: RNG Coalition 2024 LCFS ISOR Comments

Comment:

Please see our attached comment letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/6918-lcfs2024-UiBSOgNIWVVWMwBv.pdf'

Original File Name: RNG Coalition Comments on LCFS ISOR.pdf

Date and Time Comment Was Submitted: 2024-02-20 14:41:40

No Duplicates.

**Comment 250 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Tanya  
Last Name: DeRivi  
Email Address: tderivi@wspa.org  
Affiliation: WSPA

Subject: WSPA Comments on Proposed 45-day LCFS Amendments  
Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6919-lcfs2024-AnVVIAFwVWdQCQNv.pdf'

Original File Name: WSPA LCFS 45-Day Comment Letter 2-20-2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 14:44:46

No Duplicates.

**Comment 251 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Madison  
Last Name: Vander Klay  
Email Address: mvanderklay@svlg.org  
Affiliation: Silicon Valley Leadership Group

Subject: SVLG Comments on Low Carbon Fuel Standard  
Comment:

Please find attached Silicon Valley Leadership Group's comments on  
the Low Carbon Fuel Standard.

Attachment: 'www.arb.ca.gov/lists/com-attach/6920-lcfs2024-WzdUMVIIU3NWDwRn.pdf'

Original File Name: LCFS Comments, Feb 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 14:51:17

No Duplicates.

**Comment 252 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Dallas

Last Name: Gerber

Email Address: dgerber@growthenergy.org

Affiliation: Growth Energy

Subject: Growth Energy Comments on 2024 Proposed LCFS Amendments

Comment:

Please see the attached comments from Growth Energy's Senior Vice President of Regulatory Affairs, Chris Bliley, on CARB's proposed amendments to the Low Carbon Fuel Standard.

Attachment: '[www.arb.ca.gov/lists/com-attach/6921-lcfs2024-VmQCNFVmWT5XfwY2.pdf](http://www.arb.ca.gov/lists/com-attach/6921-lcfs2024-VmQCNFVmWT5XfwY2.pdf)'

Original File Name: 2024.02.20 - Growth Energy Comments on Proposed LCFS Amendments Final.pdf

Date and Time Comment Was Submitted: 2024-02-20 14:47:31

No Duplicates.



**Comment 253 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Tim  
Last Name: Gibbons  
Email Address: [timgibbons@morural.org](mailto:timgibbons@morural.org)  
Affiliation: Missouri Rural Crisis Center

Subject: Comments for Public Hearing to Consider Proposed Low Carbon Fuel Standard Amendments LCFS  
Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6923-lcfs2024-AG0AdABiAzMFXANg.pdf](http://www.arb.ca.gov/lists/com-attach/6923-lcfs2024-AG0AdABiAzMFXANg.pdf)'

Original File Name: MRCC Comment--Public Hearing to Consider Proposed Low Carbon Fuel Standard Amendments (lcfs2024) 2.20.24.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:00:50

No Duplicates.

**Comment 254 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Michael  
Last Name: Boccadoro  
Email Address: mboccadoro@westcoastadvisors.com  
Affiliation: Dairy Cares

Subject: Dairy Cares Technical Comments on LCFS Proposed Amendments  
Comment:

Dear CARB,

Please find attached the technical comments submitted on behalf of Dairy Cares in response to the proposed amendments to the Low Carbon Fuel Standard proposed amendments.

Sincerely,  
Michael Boccadoro  
Dairy Cares

Attachment: 'www.arb.ca.gov/lists/com-attach/6924-lcfs2024-ADJUZldmBWQLPwEx.pdf'

Original File Name: 240220\_Dairy Cares Comments on Proposed LCFS Amendments (00627554xBA8E1).pdf

Date and Time Comment Was Submitted: 2024-02-20 14:56:39

No Duplicates.

**Comment 255 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Julia

Last Name: Levin

Email Address: jlevin@bioenergyca.org

Affiliation: Bioenergy Association of California

Subject: LCFS2024

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6925-lcfs2024-VDZUM1MxU18GY1M8.pdf'

Original File Name: BAC Comments on LCFS Amendments (Feb2024).pdf

Date and Time Comment Was Submitted: 2024-02-20 14:58:32

No Duplicates.

**Comment 256 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Frank  
Last Name: Miller  
Email Address: fmiller@bur.org  
Affiliation: Hollywood Burbank Airport

Subject: California Air Resource Board Proposal to Regulate Jet Fuel  
Comment:

See attached letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/6926-lcfs2024-Uj9UO1U4UW4DYFMh.pdf'

Original File Name: Miller BUR Comment Letter CARB.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:04:22

No Duplicates.

**Comment 257 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Cinda

Last Name: Lohmann

Email Address: cindalohmann@turnermason.com

Affiliation: Turner, Mason & Company

Subject: Comments on Proposed Amendments

Comment:

Attached is our comment letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/6927-lcfs2024-BXFWPQBiAAwFYAlo.pdf'

Original File Name: TMC\_CALCFS2024Amendments\_Comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:04:55

No Duplicates.

**Comment 258 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Myles

Last Name: Culhane

Email Address: myles\_culhane@oxy.com

Affiliation:

Subject: 1PointFive Comments to Proposed Low Carbon Fuel Standard Amendments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6928-lcfs2024-VmcFc1c5WGIGbgF1.pdf'

Original File Name: 1PointFive\_comments\_on\_2024LCFSAmendments.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:08:56

No Duplicates.

**Comment 259 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jordan  
Last Name: Kearns  
Email Address: jordan.kearns@antora.energy  
Affiliation: Antora Energy

Subject: Antora Energy Comments Re: Proposed Amendments to the Low Carbon Fuel  
Standard Regulation  
Comment:

See attached file.

Attachment: 'www.arb.ca.gov/lists/com-attach/6929-lcfs2024-UTABaVwpUW0Hc1Ax.pdf'

Original File Name: Antora Energy Comments Re\_ Proposed Amendments to the Low Carbon  
Fuel Standard Regulation.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:04:16

No Duplicates.

**Comment 260 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Zach  
Last Name: Franklin  
Email Address: zfranklin@gridalternatives.org  
Affiliation:

Subject: Joint Comments on Proposed Amendments to the LCFS Expenditure Regulations  
Comment:

Attached please find joint comments on the proposed amendments to the LCFS expenditure regulations from Coalition for Clean Air, The Greenlining Institute, GRID Alternatives, GreenLatinos, Center for Biological Diversity, Central California Asthma Collaborative, ClimatePlan, Regional Asthma Management & Prevention (RAMP), SanDiego350, and Move LA.

Attachment: 'www.arb.ca.gov/lists/com-attach/6930-lcfs2024-BW8BaARsVWgBcwZZ.pdf'

Original File Name: Joint Comments to CARB on LCFS Revised Expenditure Regulations 2.20.24.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:07:44

No Duplicates.



**Comment 261 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Martin  
Last Name: Ryan  
Email Address: lauren1@berQrng.com  
Affiliation: BerQ RNG

Subject: LCFS updates ISOR response letter  
Comment:

Please see the attached comment letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/6931-lcfs2024-B2RROFA8Az0FZ1A+.pdf'

Original File Name: Comment Letter -LCFS Initial Statement of Reasons (BerQ RNG  
2.20.24).pdf

Date and Time Comment Was Submitted: 2024-02-20 15:13:22

No Duplicates.

**Comment 262 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Chris

Last Name: Vervaet

Email Address: [chris.vervaet@copacanada.com](mailto:chris.vervaet@copacanada.com)

Affiliation: [chris.vervaet@copacanada.com](mailto:chris.vervaet@copacanada.com)

Subject: Canadian canola industry submission

Comment:

Comments enclosed

Attachment: '[www.arb.ca.gov/lists/com-attach/6932-lcfs2024-UTJRPwNwWGIAQVa.pdf](http://www.arb.ca.gov/lists/com-attach/6932-lcfs2024-UTJRPwNwWGIAQVa.pdf)'

Original File Name: Chris Vervaet - LCFS Comment - CANADIAN OILSEED PROCESSORS ASSOCIATION (COPA).pdf

Date and Time Comment Was Submitted: 2024-02-20 15:15:01

No Duplicates.

**Comment 263 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Hossein

Last Name: Tabatabaie

Email Address: htabatabaie@iwatani.com

Affiliation: Iwatani Corporation of America

Subject: Iwatani Comments on the LCFS Amendments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6933-lcfs2024-BWxVJARkV3AHYFA+.pdf'

Original File Name: Iwatani Corporation of America\_final version.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:28:45

No Duplicates.

**Comment 264 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Greg  
Last Name: Staiti  
Email Address: greg.staiti@calumetspecialty.com  
Affiliation: Montana Renewables, LLC

Subject: Public Comments of Montana Renewables, LLC on Proposed LCFS Amendments  
Comment:

Please see our attached comments on CARB's proposed amendments to the Low Carbon Fuel Standard program.

Thank you for your consideration.

Attachment: 'www.arb.ca.gov/lists/com-attach/6934-lcfs2024-WjcHbgBvV3ADZFI8.pdf'

Original File Name: Montana Renewables, LLC - Public Comments on Proposed LCFS Amendments (2.20.2024).pdf

Date and Time Comment Was Submitted: 2024-02-20 15:28:25

No Duplicates.

**Comment 265 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Russell

Last Name: Dyk

Email Address: russ.dyk@btr.energy

Affiliation: Bridge To Renewables, Inc.

Subject: RE: Preliminary Staff Report Proposed Low Carbon Fuel Standard ("LCFS") Amendments

Comment:

On behalf of Bridge To Renewables and General Motors, we are pleased to provide comments on potential changes to California's Low Carbon Fuel Standard ("LCFS") program. We appreciate the opportunity to engage with Air Resources Board ("ARB") staff during this process.

Attachment: 'www.arb.ca.gov/lists/com-attach/6935-lcfs2024-UTIBZIQnWGkGX1c0.pdf'

Original File Name: CARB Comment Letter\_02.20.2024\_BTR\_General Motors.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:34:00

No Duplicates.

**Comment 266 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Neal  
Last Name: Reardon  
Email Address: nreardon@sonomacleanpower.org  
Affiliation:

Subject: Sonoma Clean Power Comments on Proposed LCFS Amendments  
Comment:

Dear CARB,

Please find attached Sonoma Clean Power's comments on the proposed  
Low Carbon Fuel Standards amendments.

Sincerely,  
Neal Reardon  
Director of Regulatory Affairs

Attachment: 'www.arb.ca.gov/lists/com-attach/6936-lcfs2024-BzUHNVxtUDEBNVBg.pdf'

Original File Name: 240220\_SCP Comments on Proposed LCFS Amendments  
(00627562xBA8E1).pdf

Date and Time Comment Was Submitted: 2024-02-20 15:38:03

No Duplicates.

## **Comment 267 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Chaitanya  
Last Name: Khare  
Email Address: ckhare@sgh2energy.com  
Affiliation:

Subject: Comments for LCFS amendments CARB from SGH2 Energy Global Corporation  
Comment:

Currently, SGH2 Energy is in the process of developing and building a green hydrogen plant from biomass/waste non-recyclable paper.

1. The facility will be requiring power to run the plant. We would need about 6 -8 MW of power for the plant operation, which is standard processing equipment like pumps, compressors, sensors, and electronics. And this power is not used for electrolytic H2 production. We request that we use book and claim of renewable energy credits to cover for this power consumption. For comparison, an electrolytic hydrogen production plant to produce similar hydrogen as our plant (4,000,000 Kg), would require a 100 MW of solar panels.
2. Methane - global warming potential (GWP) should be calculated based on 20 years. Methane being a potent greenhouse gas which traps heat in the atmosphere and contributes to climate change. Over a 20-year period, methane's GWP is between 84 and 87, meaning that one ton of methane emitted today has the same GWP as 84 to 87 tons of carbon dioxide over the next 20 years. And methane also has a short half-life, and its impact is only in the first 20 years. Therefore, there is no reason to calculate its GWP over 100 years.
3. According to EPA, landfill gas when captured is not more than 50%. Not all California Landfills are capped for gas. Therefore, we recommend CARB use EPA statistic and only 50% of landfill gas can be captured.

Attachment: '[www.arb.ca.gov/lists/com-attach/6937-lcfs2024-UzBQPVcJUy1WDwlq.pdf](http://www.arb.ca.gov/lists/com-attach/6937-lcfs2024-UzBQPVcJUy1WDwlq.pdf)'

Original File Name: CK - combined files.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:24:45

No Duplicates.

**Comment 268 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Paul  
Last Name: Sousa  
Email Address: paul@wudairies.com  
Affiliation: Western United Dairies

Subject: LCFS Comments  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6938-lcfs2024-VztRNFcwBCQKUwBj.pdf'

Original File Name: LCFS comments 2.20.24.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:41:59

No Duplicates.



## **Comment 269 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Tony  
Last Name: Marlow  
Email Address: tmarlow@castlecooke.com  
Affiliation: Castle & Cooke Aviation

Subject: Low Carbon Fuel Standard  
Comment:

As President of Castle & Cooke Aviation Services, Inc. headquartered at the Van Nuys Airport in Los Angeles, with 36 employees in Southern California, I am opposed to the CARB proposal to eliminate the LCFS's current exemption of jet fuel due to the following concerns:

1. The new amendment would increase the current price of jet fuel, negatively impacting the aviation industry's economic impact.
2. Jet fuel was originally recognized by CARB as exempted. This change would increase company demerits if jet fuel were used, negatively impacting overall company goals.
3. SAF production does not match current fuel uptake rates, and this proposal would do nothing to increase SAF availability.
4. Reduction in aviation activity due to the above items could negatively impact my employment numbers reducing payroll and tax contribution to the state.

We appreciate the CARB's consideration of my comments and concerns and look forward to moving ahead to find plausible, economically viable, and mutually beneficial solutions to sustainable aviation through the state.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-20 15:37:01

No Duplicates.

## **Comment 270 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: John

Last Name: Peck

Email Address: familyfarmdefenders@yahoo.com

Affiliation: Family Farm Defenders

Subject: LCFS methane offsetting through biogas digesters needs to stop

Comment:

Dear Governor Newsom and California Air Resources Board (CARB) members,

On behalf of Family Farm Defenders, a national grassroots organization based in Madison, WI with over 3000 members in all fifty states, including CA, I am writing to you to express our concern about CAFO biogas digesters being used to offset pollution generated in your state through the Low Carbon Fuel Standard (LCFS)

Pollution trading is fundamentally flawed in that it does not actually require pollution reduction, but allows polluters to instead shift their pollution impact to other communities. Worse yet, many of these supposed offsets have been shown to be bogus, meaning that the over all climate change pollution impact is actually worse.

This is certainly true in the case of CAFO biogas digesters, supposedly offsetting carbon dioxide emissions by reducing methane emissions, but in reality many of these biogas digesters are doing neither. In the case of WI there are over a dozen CAFO mega dairy farms who have long been claiming methane offset credits under the LCFS carbon market trading scheme. Thanks to the diligent oversight of many local citizen activists, we know that many of these WI CAFO biogas digesters are not actually functional as claimed and that methane is not being actually being reduced.

When this corruption was exposed in the media, CA authorities had to work hard to claw back the bogus offset credits from the WI CAFO biogas digesters, but that should not be the belated response if there was proper vetting and accountability mechanisms in place. Concerned private citizens should not have to be the watchdog for taxpayer-subsidized government-created carbon/methane trading offset markets. To be honest, such false offset claims in a pollution trading market is tantamount to wire fraud and should lead to federal prosecution.

Many of the mega dairy WI CAFO biogas digesters implicated in this fraud have a long sordid record of breaking other state and federal laws, including violations of labor laws (some farmworkers have died at these facilities trying to work on the biogas digesters) as well as numerous environmental regulations related to the Clean Water and Clean Air Acts. Some of our WI CAFO biogas digesters have even blown up and been implicated in massive manure leaks contaminating public water supplies, raising potential liability

concerns for anyone who may be financially connected - such as those engaged in the CA LCFS carbon trading market.

As a national family farm organization, we would urge you to no longer allow methane offsets in the LCFS market - these are dubious (at best) and the mega dairy CAFOs claiming such credits are causing serious harm to Midwest rural communities. At minimum, there should be no "grace period" allowed for such CAFO biogas offset claims - their lousy track record hardly warrants such. The "life cycle" analysis of supposed methane emissions as a possible offset for carbon dioxide emission needs to be seriously reevaluated - especially if the credit claims are egregiously overstated or even totally bogus.

The best offset would be giving LCFS credits to rotational grazing dairy operations (which are actually the most economically viable and climate friendly here in the Midwest according to many studies from the UW-Madison Center for Dairy Profitability), but that is sadly not acceptable under the current LCFS carbon trading system. Apparently, if a family farmer does NOT create a methane problem in the first place (by not confining their animals in a building and then putting their manure into anaerobic lagoons) then they can not get any taxpayer subsidized carbon credit for solving the climate crisis.

If the State of California is serious about reducing GHG emissions through a pollution trading system, then they should not allow corrupt CAFO operators across the country to take advantage of shoddy oversight and lackadaisical accountability to bilk taxpayers through bogus offsets. We ask that you no longer shift your pollution responsibility onto Midwest rural communities (or anywhere else for that matter) and terminate the methane biogas digester offsets in the LCFS program.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-20 14:50:46

No Duplicates.

**Comment 271 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Heather

Last Name: Breyne

Email Address: hbreyne1@gmail.com

Affiliation:

Subject: Jet fuel regulatory proposal

Comment:

I do not agree with this change. If jet fuel is not being omitted then it will raise the prices and jet fuel is already a huge part of a budget for the airline industry thus this will raise ticket prices for customers and this will negatively impact sales.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-20 15:45:15

No Duplicates.

**Comment 272 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Yoshiko  
Last Name: Tswaki  
Email Address: jetrola@jh2f.org  
Affiliation: Japan Hydrogen Forum (JH2F)

Subject: JH2F Comments on the Proposed LCFS Amendments  
Comment:

Please see attached for JH2F's comments on the proposed LCFS amendments.

Attachment: 'www.arb.ca.gov/lists/com-attach/6942-lcfs2024-AWtRP1xvBTBSC1Bi.pdf'

Original File Name: JH2F\_2024LCFSamendments\_1204PMFinal.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:37:49

No Duplicates.

**Comment 273 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Anna Bella  
Last Name: Korbatov  
Email Address: annabella@fermataenergy.com  
Affiliation: Fermata Energy

Subject: Fermata Energy Comments on Proposed 2024 LCFS Amendments  
Comment:

Please see attached comments on behalf of Fermata Energy.

Attachment: 'www.arb.ca.gov/lists/com-attach/6943-lcfs2024-BWMGZVUmWWcEYwZy.pdf'

Original File Name: Fermata Energy Comments to CARB\_LCFS\_2024  
Amendments\_2.20.24.docx.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:04:58

No Duplicates.

**Comment 274 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Gene

Last Name: Harrington

Email Address: gharrington@bio.org

Affiliation: Biotechnology Innovation Organization

Subject: 2024 Proposed Low Carbon Fuel Standard Amendments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6944-lcfs2024-UDZWNVY1BCUHdAFg.pdf'

Original File Name: February2024BIOCALCFSProposedChangesComments.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:47:08

No Duplicates.

**Comment 275 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: David

Last Name: Hovermale

Email Address: dhovermale@nopa.org

Affiliation: National Oilseed Processors Association

Subject: Comments on Proposed LCFS Program

Comment:

Attaching National Oilseed Processors Comments (NOPA) on LCFS Program and submitting NOPA and United Soybean Board (USB) LCA Study in a zip file.

Attachment: 'www.arb.ca.gov/lists/com-attach/6945-lcfs2024-VzNWMVMkU2kLaQBf.pdf'

Original File Name: David Hovermale - combined files.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:55:57

No Duplicates.



**Comment 276 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Amanda

Last Name: Myers Wisser

Email Address: amanda.myers.wisser@weavegrid.com

Affiliation: WeaveGrid

Subject: WeaveGrid Comments on Proposed LCFS Amendments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6946-lcfs2024-VSIBYIU1VnNVNIUy.pdf'

Original File Name: WeaveGrid\_Proposed LCFS Amendments\_final.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:54:28

No Duplicates.

**Comment 277 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Randy  
Last Name: Hoyle  
Email Address: rwhoyle@aeraenergy.com  
Affiliation: Aera Energy LLC

Subject: Aera Energy LLC Comment Letter  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6947-lcfs2024-WzpQMwNwAjALUgFk.pdf'

Original File Name: Aera Energy LCFS Comment Letter 2\_20\_24.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:50:13

No Duplicates.

**Comment 278 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Alexa  
Last Name: Combelic  
Email Address: [acombelic@soy.org](mailto:acombelic@soy.org)  
Affiliation: American Soybean Association

Subject: American Soybean Association Comments  
Comment:

Please see attached comments from the American Soybean Association.

Attachment: '[www.arb.ca.gov/lists/com-attach/6948-lcfs2024-UTABdFU1U19QewBf.pdf](http://www.arb.ca.gov/lists/com-attach/6948-lcfs2024-UTABdFU1U19QewBf.pdf)'

Original File Name: ASA - CARB LCFS Comments - Final.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:54:15

No Duplicates.

**Comment 279 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Alexandra  
Last Name: Frumar  
Email Address: monika@remoracarbon.com  
Affiliation: Mobile Carbon Capture Coalition

Subject: Mobile Carbon Capture Coalition Comments on Proposed LCFS Amendments  
Comment:

Please see attached the comments of Carbon Ridge, Remora, Seabound, Stax Engineering, and Wärtsilä, jointly as the Mobile Carbon Capture Coalition.

Attachment: 'www.arb.ca.gov/lists/com-attach/6949-lcfs2024-ATMHMVJhBGNWfgEx.pdf'

Original File Name: 2024.02.20 MCCA Coalition LCFS Amendment Comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:56:55

No Duplicates.

**Comment 280 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: George  
Last Name: Gentry  
Email Address: georgeg@calforests.org  
Affiliation: Calforests

Subject: Low Carbon Fuel standard Regulation  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6950-lcfs2024-WjkCZQZrV2IFbAV3.pdf'

Original File Name: Calforests LCFS letter.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:00:44

No Duplicates.

**Comment 281 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Claire  
Last Name: Broome  
Email Address: cvbroome@gmail.com  
Affiliation: 350 Bay Area

Subject: Reform LCFS staff proposal to address distorted promotion of combustion fuels  
Comment:

see attached

Attachment: 'www.arb.ca.gov/lists/com-attach/6951-lcfs2024-ATJTYFZnAw9SNIU0.pdf'

Original File Name: 350 Bay Area-LCFS comment.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:59:20

No Duplicates.

**Comment 282 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Erin  
Last Name: Cooke  
Email Address: erin.cooke@flysfo.com  
Affiliation:

Subject: LCFS Missing Key Programs to Drive SAF Uplift  
Comment:

SFO Letter Re: Low Carbon Fuel Standard Missing Key Programs to  
Drive SAF Uplift as Key Components to Reach California's Climate  
and Regional Air Quality Goals

Attachment: 'www.arb.ca.gov/lists/com-attach/6952-lcfs2024-UiFXNwFvVlpXPVIm.pdf'

Original File Name: SFO Ltr - LCFS Missing Key Programs to Drive SAF 2-20-24.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:56:54

No Duplicates.

**Comment 283 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Nora  
Last Name: Cohen Brown  
Email Address: nora@charmindustrial.com  
Affiliation: Charm Industrial

Subject: Charm's Comments on 2024 Proposed LCFS Amendments  
Comment:

Please find Charm's comments attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6953-lcfs2024-ADAHMwEuB2YANgkn.pdf'

Original File Name: 02.20.20224 \_ Proposed LCFS Amendments Comments.docx (2).pdf

Date and Time Comment Was Submitted: 2024-02-20 15:16:53

No Duplicates.



**Comment 284 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Sean

Last Name: Lock

Email Address: Sean@monarchbio.com

Affiliation:

Subject: Comments from Monarch Bioenergy LLC

Comment:

See attachment

Attachment: '[www.arb.ca.gov/lists/com-attach/6954-lcfs2024-AWwAaQZpWGpVIQdk.pdf](http://www.arb.ca.gov/lists/com-attach/6954-lcfs2024-AWwAaQZpWGpVIQdk.pdf)'

Original File Name: Monarch Bioenergy Comments on CARB LCFS Amendments - 20 Feb 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:03:43

No Duplicates.

**Comment 285 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jeremy

Last Name: Martin

Email Address: [jmartin@ucsusa.org](mailto:jmartin@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: UCS Comments on 2024 LCFS Amendments

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6955-lcfs2024-Wi8CZ1MhUFwHYgFu.pdf](http://www.arb.ca.gov/lists/com-attach/6955-lcfs2024-Wi8CZ1MhUFwHYgFu.pdf)'

Original File Name: UCS Comments on LCFS Amendments .pdf

Date and Time Comment Was Submitted: 2024-02-20 16:08:04

No Duplicates.

**Comment 286 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Will

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation: American Lung Association

Subject: Health organization comments on LCFS

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6956-lcfs2024-VTITN106VHQHXglh.pdf](http://www.arb.ca.gov/lists/com-attach/6956-lcfs2024-VTITN106VHQHXglh.pdf)'

Original File Name: LCFS health letter Feb 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:12:09

No Duplicates.

**Comment 287 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jamie

Last Name: Hall

Email Address: jamie@evrealtyus.com

Affiliation:

Subject: Joint MHD EV Infrastructure Parties - Comments on LCFS Amendments

Comment:

Please see attached comments from the Joint MHD EV Infrastructure Parties, a group of eight medium/heavy duty charging infrastructure providers.

Attachment: 'www.arb.ca.gov/lists/com-attach/6957-lcfs2024-AWxXOVM2VloHYgRs.pdf'

Original File Name: MHD Charging Coalition LCFS Comments Final.pdf

Date and Time Comment Was Submitted: 2024-02-20 15:35:58

No Duplicates.

**Comment 288 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Kiki  
Last Name: Velez  
Email Address: kvelez@nrdc.org  
Affiliation: NRDC

Subject: NRDC Comments on LCFS Staff Recommendations  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6958-lcfs2024-WzUFcVA1BTUAWQNg.pdf'

Original File Name: NRDC Comments on LCFS Staff Proposal 2-20-24.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:13:19

No Duplicates.

**Comment 289 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jeremy

Last Name: Martin

Email Address: [jmartin@ucsusa.org](mailto:jmartin@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: Scientists and economists letter on vegetable oil fuel cap

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6959-lcfs2024-BXYAZQZuUmQGbgF1.pdf](http://www.arb.ca.gov/lists/com-attach/6959-lcfs2024-BXYAZQZuUmQGbgF1.pdf)'

Original File Name: Scientists letter on LCFS veg oil cap.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:15:49

No Duplicates.

**Comment 290 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Sam

Last Name: Uden

Email Address: sam@csgcalifornia.com

Affiliation:

Subject: UCS, NRDC and WRI comments on crop-based biofuels

Comment:

Submitted on behalf of UCS, NRDC and WRI.

Attachment: 'www.arb.ca.gov/lists/com-attach/6960-lcfs2024-UidTNI0vBwtXDIQ6.pdf'

Original File Name: UCS, NRDC and WRI\_Cap on Crop-Based Biofuels\_LCFS.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:12:51

No Duplicates.

**Comment 291 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Serj

Last Name: Berelson

Email Address: serj.berelson@mainspringenergy.com

Affiliation:

Subject: Mainspring Energy Comments on Proposed LCFS Amendments

Comment:

See attached comment letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/6961-lcfs2024-AmEHYFAjVGVRCAhk.pdf'

Original File Name: CARB LCFS Letter\_Mainspring\_Final\_Feb 20 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:12:27

No Duplicates.



**Comment 292 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Elton

Last Name: Page

Email Address: etpage@cotullajet.com

Affiliation:

Subject: Proposed Low Carbon Fuel Standard Amendments

Comment:

The California Air Resources Board (CARB) has proposed changes to the Low Carbon Fuel Standard (LCFS) that would remove the Standard's original exemption for jet fuel. I oppose the proposal to demerit jet fuel, as SAF production does not currently meet uptake and an increase in jet fuel prices will negatively impact industry, not to mention your entire state in general. Instead, I support policies that will increase the production and supply of SAF and policies that will support CARB to identify alternatives to this proposal through continued industry cooperation and communication. Of course, if you choose to go ahead and continue with your proposal, I will be glad to accommodate those aircraft and businesses that will choose to leave California for greener pastures.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-20 16:11:09

No Duplicates.

**Comment 293 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Yuliya  
Last Name: Shmidt  
Email Address: yuliya.shmidt@bart.gov  
Affiliation: BART

Subject: BART's comments on fixed guideway crediting  
Comment:

Dear CARB Board and staff,

Please see the attached comments from BART on the LCFS amendments.  
We urge CARB to establish parity for fixed guideway systems within  
the LCFS program.

Sincerely,  
Yuliya Shmidt

Attachment: 'www.arb.ca.gov/lists/com-attach/6963-lcfs2024-WjhSNQd0UXYGXwVm.docx'

Original File Name: BART comments on LCFS amendments February 2024\_vF.docx

Date and Time Comment Was Submitted: 2024-02-20 16:21:49

No Duplicates.

**Comment 294 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Frank

Last Name: Harris

Email Address: fharris@cmua.org

Affiliation: California Municipal Utilities Associati

Subject: CMUA Comments on the Proposed Amendments to the Low Carbon Fuel Standard  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6964-lcfs2024-BmVXPFQgWGoGX1U5.pdf'

Original File Name: CMUA LCFS Comments 2.20.2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:22:46

No Duplicates.

**Comment 295 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Michael

Last Name: Maguire

Email Address: Michael.Maguire@opr.ca.gov

Affiliation: Office of Planning and Research (OPR)

Subject: OPR Comment Letter to the LCFS

Comment:

See attached letter from OPR Director, Sam Assefa.

Attachment: '[www.arb.ca.gov/lists/com-attach/6965-lcfs2024-BWNXOAZpWGoGbANc.pdf](http://www.arb.ca.gov/lists/com-attach/6965-lcfs2024-BWNXOAZpWGoGbANc.pdf)'

Original File Name: Final\_OPR Comment Letter to the LCFS (Feb. 2024).pdf

Date and Time Comment Was Submitted: 2024-02-20 16:11:29

No Duplicates.

**Comment 296 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Linda

Last Name: White

Email Address: linda.white@bmwna.com

Affiliation: BMW of North America

Subject: BMW LCFS Comments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6966-lcfs2024-AGJSOQZwU25QNwFe.pdf'

Original File Name: BMWNA Comments LCFS2024\_signTR.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:25:00

No Duplicates.

**Comment 297 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Andrew  
Last Name: Craig  
Email Address: acraig@calbioenergy.com  
Affiliation:

Subject: CalBio Comments on Dec 2023 LCFS Rulemaking  
Comment:

Please see attached CalBio's comments on the Dec 2023 LCFS  
rulemaking

Attachment: 'www.arb.ca.gov/lists/com-attach/6967-lcfs2024-BWY CZVM+BTRWOVI9.pdf'

Original File Name: CalBio Comments on Dec 2023 LCFS Rulemaking 2.20.2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:24:10

No Duplicates.

**Comment 298 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Andrew

Last Name: Craig

Email Address: [acraig@calbioenergy.com](mailto:acraig@calbioenergy.com)

Affiliation: California Bioenergy

Subject: CalBio Comments on DSM CI Calculator

Comment:

Please see attached CalBio's comments on the Proposed DSM CI  
Calculator

Attachment: '[www.arb.ca.gov/lists/com-attach/6968-lcfs2024-VTYCZQFsV2ZRPgBv.pdf](http://www.arb.ca.gov/lists/com-attach/6968-lcfs2024-VTYCZQFsV2ZRPgBv.pdf)'

Original File Name: CalBio Comments 2024 Proposed DSM CI Calculator.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:29:07

No Duplicates.

**Comment 299 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Ellison

Last Name: Folk

Email Address: folk@smwlaw.com

Affiliation: Shute, Mihaly & Weinberger LLP

Subject: Comments on the Proposed Amendments to the Low Carbon Fuel Standard

Comment:

Please see the attached .zip file containing comments from Ellison Folk, on behalf of The League for Justice and Accountability, regarding the Proposed Amendments to the Low Carbon Fuel Standard. Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/6969-lcfs2024-Am5RNFA3WXkGX1Az.zip'

Original File Name: LCFS comments.zip

Date and Time Comment Was Submitted: 2024-02-20 16:29:13

No Duplicates.



**Comment 300 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Nicole  
Last Name: Looney  
Email Address: nicole.looney@smud.org  
Affiliation: SMUD

Subject: SMUD's Comments on the Proposed Amendments to the Low Car  
Comment:

SMUD's Comments on the Proposed Amendments to the Low Carbon Fuel  
Standard.

Attachment: 'www.arb.ca.gov/lists/com-attach/6970-lcfs2024-AXJROgRwBTIKU1Ix.pdf'

Original File Name: SMUD Comments Re LCFS - LEG 2024-0023.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:29:13

No Duplicates.

**Comment 301 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Noah  
Last Name: Garcia  
Email Address: noah.garcia@evgo.com  
Affiliation: EVgo

Subject: EVgo Comments on Proposed LCFS Amendments  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6971-lcfs2024-VjBUO10yUWMFb1UK.pdf'

Original File Name: Final ISOR Comments February 20.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:34:58

No Duplicates.

## **Comment 302 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Julian  
Last Name: Lake  
Email Address: jlake@bayareacouncil.org  
Affiliation: Bay Area Council

Subject: Low Carbon Fuel Standard Updates  
Comment:

February 20, 2024

Rajinder Sahota  
Deputy Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Low Carbon Fuel Standard Updates

Dear Deputy Executive Officer Sahota,

On behalf of the Bay Area Council and our partners, we respectfully request the California Air Resources Board (CARB) consider specific actions in the Low Carbon Fuel Standard (LCFS) update to advance the production of Sustainable Aviation Fuels (SAF) in furtherance of California's 2045 climate goals. Specifically, we ask that CARB cap carbon intensity ratings for new Sustainable Aviation Fuel (SAF) production facilities; provide equal access expansion of book and claim accounting to SAF; leverage LCFS provisions to realize additional SAF air quality benefits beyond GhG emissions; and that CARB reconsider its proposal to regulate fossil jet fuel for intrastate flights.

The CARB 2022 Scoping Plan establishes the goal of using SAF to meet 80 percent of all aviation fuel demand by 2045, up from less than one percent today. Meeting this ambitious goal will require unprecedented investments in new infrastructure and the processing of many thousands of tons of feedstock. SAF refineries are large infrastructure projects requiring substantial financing, and the inclusion of CARB's renewable fuel refinery CI performance thresholds in commercial contracts is an increasingly important tool for making these projects pencil. Models used for the generation of price support mechanisms such as the Low Carbon Fuel Standard (LCFS) credit and the Blenders Tax Credit (BTC) rely on CI as a key metric for credit valuation and generation. However, under current rules, CARB may change the official CI for SAF projects at any time, undermining the value of the BTC and the LCFS credit that underpins project feasibility. This uncertainty acts as a disincentive to investors and is an obstacle to achieving the state's SAF production goals and broader emissions targets.

To address this challenge, CARB should consider opening a 10-year window during which time SAF refinery projects would be allowed to keep, for a period of 20 years, the CI determination made by CARB

using the GREET methodology at the time of the project's Final Investment Decision (FID). To ensure the baseline CI determined at FID is continuously met, producers should agree to re-testing on a regular bi-annual cadence. By better aligning CI incentives with asset lifespans, CARB would provide the predictability necessary for securing the large-scale financing needed to jump-start this important new industry.

We commend CARB's current policy supporting book and claim accounting for low-CI electricity and RNG inputs for low-CI hydrogen production, as well as their initiative to expand access through power purchase agreements (PPAs). Nevertheless, we advocate for equal access expansion to Sustainable Aviation Fuel (SAF). Both low-CI hydrogen and SAF play pivotal roles in displacing hard-to-electrify

sectors like aviation, as outlined in the 2022 CARB Scoping Plan. However, existing LCFS rules tend to disadvantage SAF in comparison to hydrogen due to limited access to emissions reductions from process energy, such as low-CI electricity and RNG. This incongruity undermines state objectives for SAF uptake and aviation decarbonization, necessitating CARB's intervention to ensure equitable treatment between these future fuels.

Furthermore, we underscore the critical importance of encouraging the long-term adoption of SAF by leveraging LCFS provisions to realize additional air quality and climate benefits. Notably, while light and medium/heavy-duty transportation are expected to electrify within decades, aviation's transition to decarbonization will be more prolonged, with SAF anticipated as the primary lever. CARB must recognize and account for the substantial positive externalities associated with SAF substitution for fossil jet fuel and devise mechanisms within the LCFS to drive SAF adoption. Additionally, considerations such as the air quality benefits of SAF, particularly in reducing fine particulate matter, must be addressed. Equally significant are the environmental justice concerns raised by communities living near airports, urging CARB's support for SAF as a means to mitigate the disproportionate health impacts of fossil jet fuel combustion. It is only through actual SAF adoption that these air quality benefits might be realized. Given these multifaceted benefits unique to SAF, we urge CARB to prioritize its utilization and explore innovative measures, such as credit multipliers or CO2 equivalent metrics, to appropriately incentivize its adoption and address its distinctive contributions to climate mitigation.

In addition, The Bay Area Council also expresses serious concern with a new proposal by the California Air Resources Board (CARB) to regulate "fossil jet fuel used for intrastate flights" as an obligated fuel under the LCFS Program. We do not believe this proposed change would result in increased SAF production, availability, or use in California, but it would lead to higher jet fuel prices. The primary barrier to increased SAF production and availability in California remains the higher cost of SAF for producers and buyers relative to conventional jet fuel and renewable diesel. The CARB proposal would not address this fundamental challenge or otherwise meaningfully increase SAF supply or use. Instead, the Bay Area Council suggests CARB consider alternative incentive structures that can help close the price gap between SAF and Conventional Jet-A, alongside SAF-specific economic development programs and investments via GoBiz as previously encouraged by SB1383 and the SAF Coalition.

Additionally, the intra-state flight proposal seeks to regulate jet fuel and reduce emissions from aviation, both of which are pre-empted under federal law - a fact that CARB recognized when it exempted jet fuel in 2018. Aviation has unique demands for reliability and consistency with approved fuel specifications for the safe operation and maintenance of aircraft. Accordingly, while the EPA is the primary federal regulator for on-highway, non-road, and marine fuels, under 42 U.S.C. § 7545, the FAA has authority to establish standards for composition and chemical or physical properties of jet fuel or to eliminate aircraft emissions (49 U.S.C. § 44714). The FAA retains federal jurisdiction over such fuels even if used for intrastate flights. These statutory authorities establish clear and broad federal authority for regulating jet fuel and aircraft engine emissions that pre-empts California from regulating fossil jet fuel under the LCFS program. We ask that CARB reconsider this aspect of the proposed regulation and maintain the exemption for jet fuel from regulation under the LCFS program.

The Bay Area Council represents 350 of the Bay Area's largest employers across all sectors of the economy. For many of these companies, air travel represents the vast majority of Scope 3 emissions. Unlike other sectors, aviation has no realistic net-zero alternative over the next 20 years, making state efforts to scale SAF all the more important. By better aligning current incentives with asset life cycles, California can become a world leader in SAF production and come that much closer to achieving its broader climate goals. We stand ready to offer any assistance necessary to transform these goals into a tangible reality.

Thank you for your leadership, and for considering our views.

Sincerely,

Adrian Covert  
Senior Vice President, Public Policy  
Bay Area Council

Adam Klauber  
VP Sustainability and Digital Supply Chain  
World Energy

Jared Asch  
Managing Partner  
Capstone Government Affairs

Attachment: 'www.arb.ca.gov/lists/com-attach/6972-lcfs2024-BzdWYgQrVTQGMANc.docx'

Original File Name: 02.20\_LCFS.1.docx

Date and Time Comment Was Submitted: 2024-02-20 16:30:56

No Duplicates.

**Comment 303 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jane  
Last Name: Sadler  
Email Address: jsadler@rmi.org  
Affiliation: RMI

Subject: Applicability of Book and Claim for Low CI Electricity  
Comment:

Please see attached document for comments.

Attachment: '[www.arb.ca.gov/lists/com-attach/6973-lcfs2024-nVDdIXf1yACVYm0D.pdf](http://www.arb.ca.gov/lists/com-attach/6973-lcfs2024-nVDdIXf1yACVYm0D.pdf)'

Original File Name: RMI\_LCFS 2024 Comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:27:11

No Duplicates.

**Comment 304 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Oscar  
Last Name: Garcia  
Email Address: oscar.garcia@neste.com  
Affiliation: Neste

Subject: Neste Comments on Dec 19th Proposed LCFS Regulation  
Comment:

Neste is please to submit these comments on the December 19th, 2023  
Proposed LCFS Regulation. Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/6974-lcfs2024-B2IUN1YkACcLaARb.pdf'

Original File Name: Neste\_December 19 LCFS Proposed Regulation Comments\_Feb 20  
2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:36:42

No Duplicates.

**Comment 305 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Megan

Last Name: Mekelburg

Email Address: [megan@caleec.com](mailto:megan@caleec.com)

Affiliation: Electric Vehicle Charging Association

Subject: EVCA Comments on LCFS - Multifamily Credits

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6975-lcfs2024-UTRXJ1U3ADIFLgZp.pdf](http://www.arb.ca.gov/lists/com-attach/6975-lcfs2024-UTRXJ1U3ADIFLgZp.pdf)'

Original File Name: EVCA-only letter LCFS .pdf

Date and Time Comment Was Submitted: 2024-02-20 16:39:24

No Duplicates.



**Comment 306 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jan  
Last Name: Warren  
Email Address: jxwarren1947@yahoo.com  
Affiliation: Interfaith Climate Action Network of Con

Subject: December 19, 2023 LCFS comments  
Comment:

Thanks for the opportunity to give additional comments on the draft  
Dec. 19, 2023 LCFS document.

I've attached my letter. Please let me know if you have any trouble  
receiving. the letter.

Jan Warren  
jxwarren1947@yahoo.com

Attachment: 'www.arb.ca.gov/lists/com-attach/6976-lcfs2024-BmVcNVQ4V2IQMwdp.docx'

Original File Name: COMMENTS ON LCSF PROPOSED DRAFTS FROM DECEMBER.docx

Date and Time Comment Was Submitted: 2024-02-20 16:12:46

No Duplicates.

## **Comment 307 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Julio  
Last Name: Friedmann  
Email Address: [jfriedmann@carbon-direct.com](mailto:jfriedmann@carbon-direct.com)  
Affiliation: Carbon Direct

Subject: Comment regarding DAC emissions matching requirements  
Comment:

This comment focuses on the requirements for low-carbon heat and power for CO<sub>2</sub> removal using direct air capture and storage (DACs).

It includes discussions around reporting options, technical and commercial readiness of some kinds of low-carbon energy, and the need to consider methodologies for emissions avoided and removed.

These recommendations may provide precedent and guidance for other low-carbon pathways involving significant electric and heat inputs, such as green hydrogen and e-fuels.

Attachment: '[www.arb.ca.gov/lists/com-attach/6977-lcfs2024-AF9WM109AiNQNFIN.pdf](http://www.arb.ca.gov/lists/com-attach/6977-lcfs2024-AF9WM109AiNQNFIN.pdf)'

Original File Name: CARB\_CDR-DAC-Emissionality\_Comments-final\_CarbonDirect-2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:39:26

No Duplicates.

**Comment 308 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Kevin  
Last Name: Welsh  
Email Address: kwelsh@airlines.org  
Affiliation: Airlines for America

Subject: Airlines for America Input on the 2024 Proposed Low Carbon Fuel Standard Amendments

Comment:

Airlines for America (A4A), the principal trade and service organization of the U.S. airline industry, appreciates the opportunity to provide comments to the California Air Resources Board (CARB) on the Proposed Low Carbon Fuel Standard (LCFS) Amendments. Our comments are provided in the attached document.

Attachment: 'www.arb.ca.gov/lists/com-attach/6978-lcfs2024-VTQFNwdnU18Kb1U6.pdf'

Original File Name: A4A Comments on Proposed LCFS Program Changes-2024-Final 02-20-2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:39:26

No Duplicates.

**Comment 309 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Gary  
Last Name: Grimes  
Email Address: ggrimes@worldenergy.net  
Affiliation: World Energy

Subject: World Energy's Comments on the Proposed Amendments to the LCFS  
Comment:

Attached, please find World Energy's comments on the proposed amendments to the LCFS. Thank you for the opportunity to provide these comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/6980-lcfs2024-UDxcLIUmV1sELwJd.pdf'

Original File Name: Ltr - World Energy's Comments on the Proposed Amendments to the Low Carbon Fuel Standard 02.20.24 Executed.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:17:55

No Duplicates.

**Comment 310 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jennifer

Last Name: Bingham

Email Address: [jbingham@westcoastadvisors.com](mailto:jbingham@westcoastadvisors.com)

Affiliation: Dairy Cares

Subject: Dairy Cares Comments on Proposed Low Carbon Fuel Standard Amendments

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6981-lcfs2024-VjIAZ1I6UXBWKQVa.pdf](http://www.arb.ca.gov/lists/com-attach/6981-lcfs2024-VjIAZ1I6UXBWKQVa.pdf)'

Original File Name: Dairy Cares\_Comments on the Proposed LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:47:12

No Duplicates.

**Comment 311 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Mikhael  
Last Name: Skvarla  
Email Address: mik@calobby.com  
Affiliation:

Subject: H2 Collaboration - 45-day  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6982-lcfs2024-UDhUYABeB3kAWQFt.pdf'

Original File Name: H2 - LCFS 45-day Comments\_02202024.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:47:09

No Duplicates.

**Comment 312 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Emily

Last Name: Lemei

Email Address: emily.lemei@ncpa.com

Affiliation: Northern California Power Agency

Subject: NCPA's Comments on Proposed Amendments to the LCFS

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6983-lcfs2024-UT9XMIIjUGIBWAJh.pdf'

Original File Name: NCPA Comments on LCFS Amendments\_022024F.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:52:14

No Duplicates.

**Comment 313 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Amelia

Last Name: Keyes

Email Address: amelia@cbeval.org

Affiliation: Communities for a Better Environment

Subject: CBE Comments on the Proposed 2024 LCFS Regulation

Comment:

Please see comments attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6984-lcfs2024-VTZRNvYyAg5QOgRn.pdf'

Original File Name: CBE LCFS Comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:56:22

No Duplicates.



**Comment 314 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Bernard  
Last Name: Fenner  
Email Address: [bernard.fenner@ductor.com](mailto:bernard.fenner@ductor.com)  
Affiliation: Ductor Americas

Subject: Letter of Comment on Proposed Tier 1 Calculators  
Comment:

Ductor Corporation is pleased to submit comments on the Proposed LCFS Amendments and updated Tier 1 calculators. We believe minor adjustments can significantly improve their effectiveness in promoting alternative fuels.

Detailed feedback is provided in the attached letter. Thank you for the opportunity to provide comment, and your consideration of this letter.

Attachment: '[www.arb.ca.gov/lists/com-attach/6985-lcfs2024-BWFdLIQ2AiVWP1Mh.pdf](http://www.arb.ca.gov/lists/com-attach/6985-lcfs2024-BWFdLIQ2AiVWP1Mh.pdf)'

Original File Name: Ductor\_LCFS Amendments\_Calculators.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:49:28

No Duplicates.

**Comment 315 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Stefan

Last Name: Unnasch

Email Address: unnasch@lifecycleassociates.com

Affiliation: Life Cycle Associates

Subject: Credit Adjustment and Margin of Safety

Comment:

See attached comment letter on Credit Adjustment and Margin of  
Safety.

Attachment: 'www.arb.ca.gov/lists/com-attach/6986-lcfs2024-BWIUMQNjU18GYwV3.pdf'

Original File Name: LCA\_Credit Adjustment and Margin of Safety\_LCFS Comments Feb 20  
2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:20:55

No Duplicates.

## **Comment 316 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Steven  
Last Name: Berry  
Email Address: steven.berry@yale.edu  
Affiliation: Yale University

Subject: GTAP Model in CARB  
Comment:

I am submitting the attached co-authored report evaluating the economic foundations of the GTAP model. This model is used by CARB to estimate emissions from indirect land use change ILUC for the Low Carbon Fuel Standard. It results in far lower estimates than biophysical models would estimate of the land use costs of converting land to produce the quantity of crops that are incorporated into a mega joule of each biofuel.

Our report is based on on-going research sponsored by the Tobin Center for Economic Policy at Yale. The report finds that the GTAP model lacks an economic basis and is particularly unable to project changes in land use. Our report also finds that both unsupported structural features and parameters systematically lead to these low ILUC estimates. Accordingly, GTAP does not provide a reasonable scientific basis on which to estimate ILUC nor to support a conclusion that crop-based biofuels reduce greenhouse gas emissions when replacing gasoline or diesel. For this reason, it would be inappropriate to make regulatory changes designed to reduce greenhouse gas emissions that incentive any increased use, or even continued use, of these biofuels.

The inability of GTAP to provide an economically grounded estimate of ILUC does not mean that the use of land to produce biofuels should be considered carbon-free. One reasonable alternative approach is to factor in the carbon opportunity cost of using for biofuels. It this land would be equally appropriate to use a biophysical model to estimate what the average carbon losses have been to produce the cropland that in turn generates the crops used for biofuels (amortized according to CARB policy over 30 years). Either approach is likely to conclude that using crop-based biofuels substantially increases greenhouse gas emissions relative to the use of fossil fuels.

Attachment: '[www.arb.ca.gov/lists/com-attach/6987-lcfs2024-AXVUPQNgUWsDa1AP.pdf](http://www.arb.ca.gov/lists/com-attach/6987-lcfs2024-AXVUPQNgUWsDa1AP.pdf)'

Original File Name: Tobin Center Report on the Economic Foundations of the GTAP Model (Berry, Searchinger & Yang February 2024).pdf

Date and Time Comment Was Submitted: 2024-02-20 16:57:15

No Duplicates.

**Comment 317 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Ellison

Last Name: Folk

Email Address: folk@smwlaw.com

Affiliation: Shute, Mihaly & Weinberger LLP

Subject: League for Accountability and Justice Comments on Proposed LCFS Amendments  
Comment:

Please see the attached comments from Ellison Folk, on behalf of  
The League for Justice and Accountability, regarding the Proposed  
Amendments to the Low Carbon Fuel Standard. Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/6988-lcfs2024-UzAAaQdrAjxVNjJs.pdf'

Original File Name: Comments on LCFS Amendments 2-20-24.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:48:23

No Duplicates.

**Comment 318 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Karen

Last Name: Huggard

Email Address: khuggard@nata.aero

Affiliation: National Air Transportation Association

Subject: Opposition to CARB Proposal to Regulate Jet Fuel

Comment:

The attached letter of opposition to the California Air Resources Board (CARB) proposal to regulate jet fuel under its Low Carb Fuel Standard (LCFS) Program is submitted on behalf of the following aviation industry associations and stakeholders: Airlines for American, Airbus, Aerospace Industries Association, Boeing, California Manufacturers & Technology Association, General Aviation Manufacturers Association, National Air Transportation Association, National Business Aviation Association, and RTX Corporation.

Attachment: '[www.arb.ca.gov/lists/com-attach/6989-lcfs2024-VDVAZVYpWWoCaM0d.pdf](http://www.arb.ca.gov/lists/com-attach/6989-lcfs2024-VDVAZVYpWWoCaM0d.pdf)'

Original File Name: Aviation Industry letter on CARB LCFS proposal - Final - 02-20-2024[18].pdf

Date and Time Comment Was Submitted: 2024-02-20 16:47:19

No Duplicates.

**Comment 319 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Graham  
Last Name: Noyes  
Email Address: graham@noyeslawcorp.com  
Affiliation: Low-CI Power Coalition

Subject: Low-CI Power Coalition Comments on Proposed LCFS Amendments  
Comment:

Dear CARB,

On behalf of the Low-CI Power Coalition, please find attached our comments in response to the proposed Low Carbon Fuel Standard Amendments.

Sincerely,  
Graham Noyes

Attachment: 'www.arb.ca.gov/lists/com-attach/6990-lcfs2024-ATMGNAQ1AmNRZVNj.pdf'

Original File Name: 240220\_Low CI Power Comments FINAL (00627570xBA8E1).pdf

Date and Time Comment Was Submitted: 2024-02-20 16:54:13

No Duplicates.

**Comment 320 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Matthew

Last Name: Rutherford

Email Address: [mrutherford@peninsulacleanenergy.com](mailto:mrutherford@peninsulacleanenergy.com)

Affiliation:

Subject: LCFS Regulations Amendments to Support MFR EV Charging

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/6991-lcfs2024-VjxSO1I6WGVWJAhX.pdf](http://www.arb.ca.gov/lists/com-attach/6991-lcfs2024-VjxSO1I6WGVWJAhX.pdf)'

Original File Name: Joint CCA Comments - LCFS Regulations Amendments to Support MFR  
EV Charging\_20240220.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:58:07

No Duplicates.



**Comment 321 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Stefan  
Last Name: Unnasch  
Email Address: unnasch@lifecycleassociates.com  
Affiliation: Life Cycle Associates

Subject: Temporary Fuel Pathway Code for Ethanol with CCS  
Comment:

Please see our attached comment letter on a Temporary Fuel Pathway  
Code for Ethanol with CCS.

Attachment: 'www.arb.ca.gov/lists/com-attach/6992-lcfs2024-VDhQNVAAwAw8FZQF0.pdf'

Original File Name: LCA\_Fuel Pathway Code for Ethanol with CCS\_LCFS Comments Feb 20  
2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:00:18

No Duplicates.

**Comment 322 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Stefan  
Last Name: Unnasch  
Email Address: unnasch@lifecycleassociates.com  
Affiliation: Life Cycle Associates

Subject: Comments on Proposed Tier 1 Calculators  
Comment:

We propose minor changes to the proposed Tier 1 calculators, including addressing N2O emissions and aligning with CA GREET4.0 livestock categories. Our detailed feedback is attached. Thank you for your time and consideration

Attachment: 'www.arb.ca.gov/lists/com-attach/6993-lcfs2024-BWIRNAdnUV1WfQRb.pdf'

Original File Name: LCA\_-\_Biogas\_Tier\_1\_comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:58:18

No Duplicates.

**Comment 323 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Stefan  
Last Name: Unnasch  
Email Address: unnasch@lifecycleassociates.com  
Affiliation: Life Cycle Associates

Subject: Dairy and Swine RNG Proposal  
Comment:

Please see our attached comment letter on Dairy and Swine RNG  
Proposal.

Attachment: 'www.arb.ca.gov/lists/com-attach/6994-lcfs2024-WjZWMwdnUFwCYFc2.pdf'

Original File Name: LCA\_Dairy RNG Proposal\_LCFS Comments Feb 20 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:03:46

No Duplicates.

**Comment 324 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Rock  
Last Name: Zierman  
Email Address: rock@cipa.org  
Affiliation: CIPA

Subject: CIPA Comments  
Comment:

See attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/6995-lcfs2024-AmFdMgFwBDYDWghk.pdf'

Original File Name: CIPA LCFS Comments 2-20-24-final.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:06:07

No Duplicates.

**Comment 325 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Colleen

Last Name: Liang

Email Address: cliang@portoakland.com

Affiliation: Port of Oakland

Subject: Comments on Proposed LCFS Amendments

Comment:

Please see attached letter.

Attachment: '[www.arb.ca.gov/lists/com-attach/6996-lcfs2024-Uj5TNIYxBycDWlcn.pdf](http://www.arb.ca.gov/lists/com-attach/6996-lcfs2024-Uj5TNIYxBycDWlcn.pdf)'

Original File Name: LCFS Port Comments 2024.02.20.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:06:26

No Duplicates.

**Comment 326 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Mahlon  
Last Name: Aldridge  
Email Address: emahlon@ecoact.org  
Affiliation: Ecology Action

Subject: Ecology Action Comments LCFS Reg Ammendment  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6998-lcfs2024-AGUHYgNtWGdVPFA3.docx'

Original File Name: Ecology Action Comments LCFS Holdback Funds-2024-02-20.docx

Date and Time Comment Was Submitted: 2024-02-20 17:11:11

No Duplicates.

**Comment 327 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Stefan  
Last Name: Unnasch  
Email Address: Unnasch@lifecycleassociates.com  
Affiliation: Life Cycle Associates LLC

Subject: Correction to Non-combustion VOC Emissions for Ethanol Pathways  
Comment:

Please see the attached letter for our comments. Thank you.

Attachment: '[www.arb.ca.gov/lists/com-attach/6999-lcfs2024-BWlcOVU1VVkHLABf.pdf](http://www.arb.ca.gov/lists/com-attach/6999-lcfs2024-BWlcOVU1VVkHLABf.pdf)'

Original File Name: LCA\_-\_Corn Ethanol biogenic VOC 2024\_V3.pdf

Date and Time Comment Was Submitted: 2024-02-20 16:49:41

No Duplicates.

**Comment 328 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Stefan

Last Name: Unnasch

Email Address: unnasch@lifecycleassociates.com

Affiliation: Life Cycle Associates

Subject: Avoided Methane from Organic Materials and Renewable Power for Process Fuel  
Comment:

Please see our comment letter attached addressing Avoided Methane  
from Organic Materials and Renewable Power for Process Fuel.

Attachment: 'www.arb.ca.gov/lists/com-attach/7000-lcfs2024-WjZcOVU1VFhXPAh7.pdf'

Original File Name: LCA\_MSW and Power\_LCFS Comments Feb 20 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:16:07

No Duplicates.



**Comment 329 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Chad  
Last Name: Frahm  
Email Address: chad.frahm@brightmark.com  
Affiliation: Brightmark

Subject: Brightmark comments to CARB LCFS amendments  
Comment:

Please see Brightmark's comments to CARB LCFS amendments attached.  
Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/7002-lcfs2024-AGICdgNrAzcFa1Qg.pdf'

Original File Name: Brightmark comments.CARB LCFS amendments.Feb 20 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:24:16

No Duplicates.

**Comment 330 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Erin  
Last Name: Cooke  
Email Address: erin.cooke@flysfo.com  
Affiliation: San Francisco International Airport

Subject: LCFS Missing Key Programs to Drive SAF Uplift to Reach CA's Climate and Air Quality Goals

Comment:

As you know San Francisco International Airport (SFO) is a global leader of sustainable aviation fuel (SAF) uplift, using ten million gallons of neat SAF delivered last year. Receipt of this fuel was exclusively enabled by CARB's 2018 Low Carbon Fuel Standard Rulemaking that incentivized SAF beyond any other state or country. While SFO respects the bold decarbonization vision that CARB outlined in its 2022 Scoping Plan Update, we write today to humbly request that CARB team with key members of our aviation industry, as AB1322 requested, to develop a far broader playbook than that proposed in this 2024 LCFS Rulemaking to ensure the state meets Governor Newsom's 20% clean fuels adoption for the aviation sector, estimated at 1.5 billion gallons of SAF by 2030.

Attachment: '[www.arb.ca.gov/lists/com-attach/7005-lcfs2024-USJWNgdpUFxQOIUh.pdf](http://www.arb.ca.gov/lists/com-attach/7005-lcfs2024-USJWNgdpUFxQOIUh.pdf)'

Original File Name: SFO Ltr - LCFS Missing Key Programs to Drive SAF 2-20-24.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:26:51

No Duplicates.

**Comment 331 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: George  
Last Name: Kivork  
Email Address: george.kivork@jobyaviation.com  
Affiliation: Joby Aviation

Subject: Joby's Comments on Proposed LCFS Amendments  
Comment:

Please see attached the Comments of Joby Aviation on the Proposed  
Amendments to the Low Carbon Fuel Standard.

Attachment: 'www.arb.ca.gov/lists/com-attach/7006-lcfs2024-UWMHMVdkB2RReQg4.pdf'

Original File Name: 2020.02.20 Joby LCFS Amendments Comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:11:20

No Duplicates.

**Comment 332 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Cassandra  
Last Name: Farrant  
Email Address: cfarrant@ampamericas.com  
Affiliation: Amp Americas

Subject: Comments on the Proposed Low Carbon Fuel Standard Amendments  
Comment:

Amp America appreciates the opportunity to submit comments in response to the proposed Low Carbon Fuel Standard Amendments. Please see our comments attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/7007-lcfs2024-UjNdNIEgUI4CdAFz.pdf'

Original File Name: Amp Proposed LCFS Admendments Comment Letter.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:20:56

No Duplicates.

**Comment 333 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Claire  
Last Name: Behar  
Email Address: Claire.Behar@Hystoreenergy.com  
Affiliation: Hy Stor Energy

Subject: Hy Stor Energy's Comments on Proposed Low Carbon Fuel Standard Amendments  
Comment:

Dear California Air Resources Board,

Thank you for the opportunity to provide comments on the proposed low-carbon fuel standard amendments. Hy Stor Energy LP respectfully submits the following comments, which are intended to facilitate the adoption of clean hydrogen in low-carbon transportation fuels, which include sustainable aviation fuel (SAF), power-to-liquids, and renewable diesel, and would help scale up a low-carbon fuel industry that would support the decarbonization of the U.S. economy.

Sincerely,  
Hy Stor Energy LP

Attachment: 'www.arb.ca.gov/lists/com-attach/7008-lcfs2024-AmpRLgZYAiJRI1c4.pdf'

Original File Name: Hy Stor Energy LCFS Comments Final.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:30:08

No Duplicates.

**Comment 334 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Tyler  
Last Name: Cole  
Email Address: tyler.cole@tes-h2.com  
Affiliation:

Subject: TES Comments on Proposed Amendments to the California LCFS Program  
Comment:

TES US Development LLC is pleased to submit the attached comment letter to share our company's perspective on key aspects of the Proposed Amendments to the Low Carbon Fuel Standard ("LCFS") regulation relevant to electrofuels (e-fuels) producers. TES respectfully requests the California Air Resources Board consider the referenced topics in the LCFS update, to advance California's transition to cleaner transportation fuels and in furtherance of California's climate goals.

Attachment: 'www.arb.ca.gov/lists/com-attach/7009-lcfs2024-Wi4GZV0vBAgAagdk.pdf'

Original File Name: TES\_LCFS Comments\_Final-240219.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:28:29

No Duplicates.

**Comment 335 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Alexandra  
Last Name: Frumar  
Email Address: monika@remoracarbon.com  
Affiliation: Remora

Subject: Remora Comments on Proposed LCFS Amendments  
Comment:

Please see attached Remora's Comments on the Proposed Low Carbon  
Fuel Standard Amendments.

Attachment: 'www.arb.ca.gov/lists/com-attach/7010-lcfs2024-VGYANgEyUzRSelRk.pdf'

Original File Name: 2024.02.20 Remora Comments on LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:32:02

No Duplicates.

**Comment 336 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Katelyn  
Last Name: Roedner Sutter  
Email Address: kroedner@edf.org  
Affiliation: Environmental Defense Fund

Subject: EDF comments re: potential changes to LCFS  
Comment:

Attached please find comments regarding potential changes to the  
Low Carbon Fuel Standard on behalf of Environmental Defense Fund.

Attachment: 'www.arb.ca.gov/lists/com-attach/7011-lcfs2024-BWBWNFE2BwsGYwdo.pdf'

Original File Name: EDF Comments re Proposed Changes to LCFS 2.20.24.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:34:30

No Duplicates.



**Comment 337 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Ryan

Last Name: Kenny

Email Address: ryan.kenny@cleanenergyfuels.com

Affiliation: Coalition of 51 Stakeholders

Subject: Comment Letter from 51 Stakeholders

Comment:

Please find attached a comment letter on the proposed LCFS amendments from 51 stakeholders. Thank you for considering our views.

Attachment: 'www.arb.ca.gov/lists/com-attach/7013-lcfs2024-W2lAYwdyUnIQLM0d.pdf'

Original File Name: Multi-Stakeholder LCFS Comment Letter Feb 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:33:11

No Duplicates.

**Comment 338 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Matt

Last Name: Miyasato

Email Address: matt.miyasato@firstelementfuel.com

Affiliation: FirstElement Fuel

Subject: FEF Comments on LCFS proposed changes

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/7015-lcfs2024-AmRRMII1BAgLYQhr.pdf'

Original File Name: FEF LCFS comments Feb2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:37:39

No Duplicates.

**Comment 339 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Holly  
Last Name: Yanai  
Email Address: hyanai@divertinc.com  
Affiliation:

Subject: Divert Comments on The Proposed Low Carbon Fuel Standard Amendments  
Comment:

Good Afternoon -

Please find Divert's comments regarding the Proposed Low Carbon Fuel Standard attached.

Thank you,

Holly Yanai

Attachment: 'www.arb.ca.gov/lists/com-attach/7016-lcfs2024-VTZQNwR3BTQLUlc7.pdf'

Original File Name: CARB LCFS Amendments - Divert Comments.docx.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:45:56

No Duplicates.

**Comment 340 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jamie

Last Name: Katz

Email Address: jbkatz@leadershipcounsel.org

Affiliation:

Subject: Defensores Comments on LCFS ISOR

Comment:

attached

Attachment: 'www.arb.ca.gov/lists/com-attach/7017-lcfs2024-B2MBYIM0V2FXP1Mg.pdf'

Original File Name: Defensores Letter - LCFS 2.20.24 .pdf

Date and Time Comment Was Submitted: 2024-02-20 17:46:41

No Duplicates.

**Comment 341 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Trisha  
Last Name: Delloiacono  
Email Address: tdelloiacono@calstart.org  
Affiliation: CALSTART

Subject: Support Proposed Amendments to the Low Carbon Fuel Standard Regulation  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/7018-lcfs2024-BmVcO1M+BCRRI1Ax.pdf'

Original File Name: CALSTART Comments on Proposed Low Carbon Fuel Standard  
Amendments 2\_20\_24.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:47:54

No Duplicates.

**Comment 342 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Stefan  
Last Name: Unnasch  
Email Address: unnasch@lifecycleassociates.com  
Affiliation: Life Cycle Associates

Subject: Low Carbon Fuels Coalition Working Group on Biomass Comments on Draft Amendments

Comment:

On behalf of the Low Carbon Fuels Coalition Working Group on Biomass, we appreciate the opportunity to provide comments on the Draft Amendments to the LCFS Regulation. Our working group supports the overall objectives of the LCFS program and would like to express our specific recommendations regarding the inclusion of biomass feedstocks in the regulation. These recommendations are detailed in the attached letter. Thank you for your consideration of these comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/7019-lcfs2024-UDxWM1I1VmYFXARn.pdf'

Original File Name: LCFC\_CALCFS\_Biomass\_Comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:54:52

No Duplicates.

**Comment 343 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Judy

Last Name: Vaccaro-Fry

Email Address: [jfry@avta.com](mailto:jfry@avta.com)

Affiliation: Antelope Valley Transit Authority

Subject: AVTA Comments on LCFS Proposed Amendments

Comment:

Please find our comments attached. Thank you.

Attachment: '[www.arb.ca.gov/lists/com-attach/7021-lcfs2024-W2IUyIFiAGcAKwY2.pdf](http://www.arb.ca.gov/lists/com-attach/7021-lcfs2024-W2IUyIFiAGcAKwY2.pdf)'

Original File Name: 2024-02 CARB response.pdf

Date and Time Comment Was Submitted: 2024-02-20 18:01:51

No Duplicates.

**Comment 344 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Don

Last Name: Schinske

Email Address: don@lcfcoalition.com

Affiliation: Low Carbon Fuels Coalition

Subject: Re-Upload of ICF Update

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/7022-lcfs2024-UWMAMIVkUTAKPQk9.pdf'

Original File Name: 240214 Analyzing Low Carbon Fuel Targets .pdf

Date and Time Comment Was Submitted: 2024-02-20 18:05:16

No Duplicates.



**Comment 345 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Robert  
Last Name: Coviello  
Email Address: robert.coviello@bunge.com  
Affiliation: Bunge

Subject: Bunge Comments Regarding Proposed LCFS Amendments  
Comment:

Please find Bunge's comments attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/7024-lcfs2024-UjBTIFE+V2MAY1QL.pdf'

Original File Name: Bunge Comments Regarding Proposed LCFS Amendments  
(02.20.2024).pdf

Date and Time Comment Was Submitted: 2024-02-20 18:08:51

No Duplicates.

## **Comment 346 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Chelsea

Last Name: Lee

Email Address: chelsea@betterworldgroup.com

Affiliation: Coalition to Fix the LCFS

Subject: Fix the Low Carbon Fuel Standard - Prioritize Zero Emission Investments

Comment:

On behalf of more than three dozen cross-sectoral organizations, we respectfully submit the attached critical process and substantive recommendations for CARB to fix the LCFS. We urge CARB to provide a non-voting, informational Board hearing, which will allow for more time and the opportunity for meaningful public and Board engagement. This need for more engagement opportunities is underscored by the major deficiencies that remain in the current proposal. We urge CARB to prioritize fixing the LCFS this year in the following ways:

A. Reign in bogus credits that are depressing the credit price, distorting markets, and harming people and ecosystems by:

- Eliminating avoided methane crediting for fuel derived from livestock manure.

- Capping the use of lipid biofuels.

B. Leverage the LCFS to achieve a zero-emissions future for all Californians by:

- Creating ZEV multipliers to boost electric school bus and electric public transit bus and rail system deployments.

- Following through with the inclusion of intrastate jet fuel as a deficit generator and starting to analyze the path toward including California's share of the fuel used in interstate and international flights.

- Allowing credits for zero-emission transportation fuels used for ocean-going vessels, and simplifying the process for credits for shore power installations serving electrified harbor crafts and for dispensing green hydrogen.

Attachment: 'www.arb.ca.gov/lists/com-attach/7025-lcfs2024-UT0GY106ACAFXABq.pdf'

Original File Name: LCFS Joint Letter - 02.20.2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 17:22:56

No Duplicates.

**Comment 347 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Alexis  
Last Name: Moch  
Email Address: amoch@prologis.com  
Affiliation: Prologis

Subject: Prologis Comments on Proposed Low Carbon Fuel Standard Amendments  
Comment:

Please see attached comment document. Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/7026-lcfs2024-UCBUIF0zVmkKYwVi.pdf'

Original File Name: Prologis LCFS Comments 02202024.pdf

Date and Time Comment Was Submitted: 2024-02-20 18:07:43

No Duplicates.

## **Comment 348 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Patty

Last Name: Lovera

Email Address: pattylovera20@gmail.com

Affiliation: Campaign for Family Farms and the Env't

Subject: End LCFS Support for Manure Digesters

Comment:

February 20, 2024

Dear Governor Newsom and Members of the California Air Resources Board,

The Campaign for Family Farms and the Environment appreciates the opportunity to comment on the Notice of Public Hearing to Consider Proposed Low Carbon Fuel Standard Amendments. CFFE is a coalition of state and national organizations, including Dakota Rural Action, Iowa Citizens for Community Improvement, Land Stewardship Project, Missouri Rural Crisis Center, Food & Water Watch and Institute for Agriculture and Trade Policy. Our organizations work together as CFFE to change policies that promote consolidation in animal agriculture at the expense of independent family farms, rural and urban economies, workers and an open, fair and competitive food system.

Our members have witnessed the shift in the structure of the livestock sector away from independent diversified farms to industrialized animal feeding operations in their communities. These factory farms concentrate animals and their waste, burdening surrounding communities with air and water pollution. A report by Food & Water Watch called *Factory Farm Nation: 2020 Edition* provides many examples of what happens to communities when livestock and their waste is concentrated in specific regions. Just one example of FWW's findings illustrates the problem: hogs on factory farms in Duplin County, North Carolina produce the same weight in manure as residents of Boston. But unlike human sewage, hog and other livestock waste is not treated before being released into the environment. Around the country, neighbors of these facilities report odors and other health impacts, and losing the ability to spend time outdoors. Anaerobic digesters are touted by the industry as a win-win solution that creates usable energy while reducing the environmental impact from the management of massive quantities of manure. But communities around the country know that this technology is far from a real solution. Instead, digesters allow factory farms to not only remain a burden on surrounding communities, but often to grow even larger.

Unfortunately, California's preference for manure-derived biogas in the LCFS program is driving the expansion and entrenchment of factory farms and dirty biogas projects far beyond California, including into our communities. The LCFS has become a lucrative financing tool for factory farm biogas. It is driving the

construction of more factory farms and factory farm biogas projects in states far from California, causing severe harm to air, water, public health, rural economies, and overall quality of life.

The current flaws in the LCFS, such as "avoided methane crediting" and inaccurate life cycle assessments, not only enable pollution but disproportionately harm low-income communities and communities of color who live near factory farms and manure digesters. This is in stark contrast to the environmental justice commitment set by California.

CCFE believes that climate change is a serious challenge that requires a dramatic response. This crisis demands more than highly speculative market-based schemes that will allow polluters to keep polluting and let agribusiness pay farmers less for their crops and livestock. A serious plan to address agriculture and climate change must address structural issues, not just attempt minor improvements in environmental performance in a highly consolidated, industrialized factory farm system. Factory farms require huge quantities of feed, water, chemical inputs and energy and manage manure in a way that drives greenhouse gas emissions. California's climate programs must support a dramatic transition in how we raise animals for food that is centered on independent family farms and sustainably managed grazing systems.

Using California's climate programs, including the LCFS, to support expensive manure management projects on confinement operations fails to make this necessary structural change, and instead props up and expands the factory farm system. Prioritizing grazing over factory farm manure management would increase the sequestration of carbon in pastures, and also avoid the emissions from industrialized animal operations' feed production and liquid manure storage. Manure lagoons not only emit high amounts of methane and nitrous oxide, but they are also highly vulnerable to natural disasters such as hurricanes and floods. And confinement operations decouple grazing animals from grasslands, requiring more synthetic fertilizers for feed production, which drives further emissions.

In addition to these overarching concerns about LCFS' support for manure digesters, we urge you to prioritize the following changes to the standard:

- Eliminate "avoided methane crediting"
- Address inaccuracies in the Life Cycle Assessment that ignore associated up and downstream greenhouse gas emissions from factory farm gas production
- Remove the 10-year "grace period" for factory farm gas producers
- Stop double counting by allowing factory farm gas projects paid for and claimed by other programs to sell LCFS credits as well.

For practices related to manure management, including anaerobic digesters, the LCFS calculation should evaluate not only the risks of increased ammonia emissions and water pollution from disposal of digestate, but also the potential that the contract will lead to an increase in the total number or density of livestock raised on the site. The potential for LCFS funding to lead to more animals being raised on an operation with a digester, and the increase in enteric emissions and carbon emissions from feed production related to the increase, should be incorporated into a new LCFS scoring system for

manure-derived biogas.

The California Air Resources Board (CARB) has the opportunity to adopt new rules that would realign the LCFS with California's environmental justice commitments and stop rewarding factory farms around the country for their pollution. CARB's Environmental Justice Advisory Committee has presented a clear alternative that CARB should incorporate to align the LCFS with California's environmental justice commitments and end the state's support of environmental harm in communities across the country.

We appreciate the opportunity to comment on this critical subject.

Sincerely,

Campaign for Family Farms and the Environment

Attachment: '[www.arb.ca.gov/lists/com-attach/7027-lcfs2024-VDdWNI06UmQGxwBj.pdf](http://www.arb.ca.gov/lists/com-attach/7027-lcfs2024-VDdWNI06UmQGxwBj.pdf)'

Original File Name: CFFE comment LCFS 2023.pdf

Date and Time Comment Was Submitted: 2024-02-20 18:10:13

No Duplicates.

**Comment 349 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Gary  
Last Name: Hughes  
Email Address: garyhughes.bfw@gmail.com  
Affiliation: Biofuelwatch

Subject: CARB push for liquid biofuels endangers global forests  
Comment:

Please see the attached document as comment on the proposed Low Carbon Fuel Standard Amendments.

Attachment: 'www.arb.ca.gov/lists/com-attach/7028-lcfs2024-B2VdMIA+AjcFdIA1.pdf'

Original File Name: Biofuelwatch\_LCFSSRulemaking\_2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 18:20:26

No Duplicates.

**Comment 350 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Jessi  
Last Name: Davis  
Email Address: jdavis6@socalgas.com  
Affiliation: SoCalGas

Subject: SoCalGas Comments on Proposed Amendments to the Low Carbon Fuel Standard  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/7029-lcfs2024-WyhcnVU3VGYBa1M0.pdf'

Original File Name: SoCalGas Comments on Proposed Amendments to the Low Carbon Fuel Standard.pdf

Date and Time Comment Was Submitted: 2024-02-20 18:26:07

No Duplicates.



## **Comment 351 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Graham  
Last Name: Noyes  
Email Address: graham@noyeslawcorp.com  
Affiliation: Noyes Law Corporation

Subject: The Importance to California's Climate Goals of Power-to-Liquid Fuels  
Comment:

Please find the attached comment submit jointly by Infinium, Twelve, Air Company, Arcadia eFuels, Dimensional Energy, Boom and the International Airlines Group. A brief summary of the comment is included below. Please contact me regarding any issues or questions relating to the comment.

Thank you for your assistance.

Best Regards,  
Graham Noyes  
Noyes Law Corporation

### Comment Summary:

The signatories of this letter are pleased to submit comments recommending a modification to the California Air Resources Board's ("CARB") proposed amendments to the Low Carbon Fuel Standard ("LCFS"). We support CARB's LCFS program, as it sends a market based, and provides long-term policy stability that supports investment. However, we respectfully request that CARB maintain LCFS policy stability for the clean fuels industry and preserve the eligibility of facilities that produce Power-to-Liquid ("PtL") fuels to source low-carbon intensity electricity ("Low-CI Electricity") via book-and-claim accounting. PtL fuels, also known as eFuels, electrofuels or synthetic fuels, are drop-in replacement fuels for use in airplanes, ships and motor vehicles that do not trigger the costs or delays inherent to engine or infrastructure changes. Specifically, we request that CARB preserve the current renewable energy certificate ("REC") system for electrolytic hydrogen and enable the sourcing of energy for PtL fuel production via book-and claim accounting.

Attachment: '[www.arb.ca.gov/lists/com-attach/7030-lcfs2024-VD4AaQRsU25SIABf.pdf](http://www.arb.ca.gov/lists/com-attach/7030-lcfs2024-VD4AaQRsU25SIABf.pdf)'

Original File Name: Joint eFuel LCFS Comment FINAL.pdf

Date and Time Comment Was Submitted: 2024-02-20 18:28:37

No Duplicates.

**Comment 352 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Alex  
Last Name: Menotti  
Email Address: alex.menotti@lanzajet.com  
Affiliation:

Subject: Aviation and the CA LCFS  
Comment:

Please find attached comments from a coalition of SAF producers and stakeholders including Advanced Biofuels Canada, Blue Arrow, Comstock Fuels, Darling Ingredients, Fulcrum Bioenergy, Green Plains, LanzaJet, LanzaTech, Raizen, SkyNRG, and Velocys.

We appreciate the opportunity to comment. Please do not hesitate to reach out with any questions.

Attachment: 'www.arb.ca.gov/lists/com-attach/7031-lcfs2024-WyhC01A3Ag5RMAV3.zip'

Original File Name: SAF group comments on LCFS Rulemaking 2024.zip

Date and Time Comment Was Submitted: 2024-02-20 18:26:52

No Duplicates.

## **Comment 353 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Graham  
Last Name: Noyes  
Email Address: graham@noyeslawcorp.com  
Affiliation: NLC on behalf of Infinium

Subject: Comment of Infinium RE: Electrofuels  
Comment:

Attached please find the comments of Infinium regarding the proposed Low Carbon Fuel Standard regulations. Below is a summary of the comments. Please contact me for any questions relating to the comments.

Best Regards,  
Graham Noyes  
Noyes Law Corporation

Infinium Operations, LLC ("Infinium") is pleased to submit comments recommending specific modifications to the California Air Resources Board's ("CARB") proposed amendments to the Low Carbon Fuel Standard ("LCFS"). We strongly support CARB's LCFS program. However, we respectfully request that CARB revisit its proposed power sourcing structure as applied to power-to-liquid fuels which are also known as eFuels". In the same way that electric vehicles must utilize zero carbon power to be carbon neutral, eFuels must be produced from zero carbon power to be carbon neutral. We respectfully recommend that CARB follow its own precedent by allowing eFuels to source low carbon intensity ("Low-CI") power in the future in the same manner as electric vehicles do today.

Attachment: 'www.arb.ca.gov/lists/com-attach/7032-lcfs2024-VD1TO1UyUWsHb1Q9.pdf'

Original File Name: Infinium Only Letter FINAL.pdf

Date and Time Comment Was Submitted: 2024-02-20 18:38:45

No Duplicates.

**Comment 354 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Brian

Last Name: Kee

Email Address: brian.kee@mn8energy.com

Affiliation: MN8 Energy

Subject: MN8 Energy Comments on Proposed Low Carbon Fuel Standard Amendments

Comment:

Attachment: '[www.arb.ca.gov/lists/com-attach/7034-lcfs2024-Am8FbVZvV1tQMwln.pdf](http://www.arb.ca.gov/lists/com-attach/7034-lcfs2024-Am8FbVZvV1tQMwln.pdf)'

Original File Name: MN8 Energy Comments on Proposed Low Carbon Fuel Standard Amendments.pdf

Date and Time Comment Was Submitted: 2024-02-20 18:45:49

No Duplicates.

**Comment 355 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Emily  
Last Name: Carlton  
Email Address: emily.carlton@lanzajet.com  
Affiliation: LanzaJet

Subject: Aviation and the CA LCFS  
Comment:

Please find attached comments from LanzaJet regarding the proposed changes to the CA LCFS.

We appreciate the opportunity to comment. Please feel free to reach out with any questions.

Attachment: 'www.arb.ca.gov/lists/com-attach/7035-lcfs2024-BmpVMlc4ACIXMfc9.pdf'

Original File Name: LanzaJet\_Comments on LCFS Rulemaking 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 18:53:39

No Duplicates.

**Comment 356 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Claire  
Last Name: Behar  
Email Address: Claire.Behar@Hystoreenergy.com  
Affiliation:

Subject: Hy Stor Energy's Comments on Proposed Low Carbon Fuel Standard Amendments  
Comment:

Dear California Air Resources Board,

Thank you for the opportunity to provide comments on the proposed low-carbon fuel standard amendments. Hy Stor Energy LP respectfully submits the following comments, which are intended to facilitate the adoption of clean hydrogen in low-carbon transportation fuels, which include sustainable aviation fuel (SAF), power-to-liquids, and renewable diesel, and would help scale up a low-carbon fuel industry that would support the decarbonization of the U.S. economy.

Sincerely,

Hy Stor Energy LP

Attachment: 'www.arb.ca.gov/lists/com-attach/7036-lcfs2024-UTkCfQFfVHRXJQVq.pdf'

Original File Name: Hy Stor Energy LCFS Comments Final.pdf

Date and Time Comment Was Submitted: 2024-02-20 18:58:34

No Duplicates.

**Comment 357 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Shiva

Last Name: Swaminathan

Email Address: shiva.swaminathan@cityofpaloalto.org

Affiliation: City of Palo Alto

Subject: Comments on the Amendments to the LCFS Regulation

Comment:

City of Palo Alto would like to hereby earnestly request CARB to consider exempting smaller CNG stations operated by governmental entities from the verification process, as the cost for verification largely outweigh the benefit when applied to these small and not-for-profit entities dispensing standard fuel such as CNG.

Attachment: '[www.arb.ca.gov/lists/com-attach/7037-lcfs2024-UjFUMwd0U2JRCAll.pdf](http://www.arb.ca.gov/lists/com-attach/7037-lcfs2024-UjFUMwd0U2JRCAll.pdf)'

Original File Name: CARB LCFS Regulation Comment Letter from Palo Alto - February 2024 v1.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:02:24

No Duplicates.

**Comment 358 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Casey

Last Name: Coward

Email Address: casey.coward@seiu-usww.org

Affiliation: SEIU - United Service Workers West

Subject: Public Comment on Proposed LCFS Amendments - SEIU USWW

Comment:

Please see the attached for SEIU USWW's comments on the proposed LCFS amendments.

Attachment: 'www.arb.ca.gov/lists/com-attach/7038-lcfs2024-VSZQMwdvACZQewJ3.pdf'

Original File Name: SEIU-USWW\_CARB\_LCFS\_Comment\_2-20-24.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:04:03

No Duplicates.



**Comment 359 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Virgil  
Last Name: Welch  
Email Address: virgil@caliberstrat.com  
Affiliation:

Subject: CCSC\_LCFS\_2.20.24  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/7039-lcfs2024-UDNcOQByBTUCWwdr.pdf'

Original File Name: CCSC\_LCFS\_02.20.24.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:05:08

No Duplicates.

**Comment 360 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Mark

Last Name: Vincelli

Email Address: mark.vincelli@maasenergy.com

Affiliation: Maas Energy Works

Subject: Maas Energy Works Comment on Proposed LCFS Amendments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/7040-lcfs2024-BmtcP1UjWFRWIFci.pdf'

Original File Name: MEW\_Public Comment\_2024.02 - DRM Signed.pdf

Date and Time Comment Was Submitted: 2024-02-20 18:57:32

No Duplicates.

**Comment 361 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Eric  
Last Name: Mintzer  
Email Address: ekmintz@gmail.com  
Affiliation:

Subject: RE: CARB Proposed 2024 LCFS Amendments  
Comment:

See Attached

Attachment: 'www.arb.ca.gov/lists/com-attach/7041-lcfs2024-BWIQNVE2UXFRCFU7.pdf'

Original File Name: LCFS Note.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:06:53

No Duplicates.

**Comment 362 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Thad  
Last Name: Kurowski  
Email Address: tkurowski@tesla.com  
Affiliation: Tesla

Subject: Tesla Comments on CARB's Proposed Low Carbon Fuel Standard Amendments (Dec. 19, 2023)

Comment:

Please accept the attached comments on behalf of Tesla.

Attachment: 'www.arb.ca.gov/lists/com-attach/7042-lcfs2024-AjBdb1VkVjcLP1Rk.pdf'

Original File Name: 240220 Final Tesla LCFS Comments .pdf

Date and Time Comment Was Submitted: 2024-02-20 18:52:18

No Duplicates.

**Comment 363 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Cory-Ann  
Last Name: Wind  
Email Address: cwind@cleanfuels.org  
Affiliation: Clean Fuels Alliance America

Subject: Comments on the Proposed LCFS Amendments  
Comment:

Thank you for the opportunity to submit these comments on behalf of  
the Clean Fuels Alliance America and California Advanced Biofuels  
Alliance.

Attachment: 'www.arb.ca.gov/lists/com-attach/7043-lcfs2024-BWZRMQZmUmBXDIU2.pdf'

Original File Name: CFAA Comments CARB LCFS.Final.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:10:54

No Duplicates.

**Comment 364 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Michael  
Last Name: Pimentel  
Email Address: michael@caltransit.org  
Affiliation: California Transit Association

Subject: California Transit Association - LCFS Comment Letter  
Comment:

Attached here.

Attachment: 'www.arb.ca.gov/lists/com-attach/7044-lcfs2024-AmFVJwRkBQISOAhr.pdf'

Original File Name: CTA LCFS Comment Letter.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:15:35

No Duplicates.

**Comment 365 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Russell

Last Name: Dyk

Email Address: russ.dyk@btr.energy

Affiliation: Bridge To Renewables, Inc.

Subject: Preliminary Staff Report Proposed LCFS Amendments - Dairy Biogas to Electricity  
Comment:

We are pleased to provide comments on proposed changes to biogas-based electricity crediting in response to the Preliminary Staff Report Proposed Low Carbon Fuel Standard ("LCFS") Amendments.

Attachment: 'www.arb.ca.gov/lists/com-attach/7045-lcfs2024-VDcHYFYIWGISCwRn.pdf'

Original File Name: CARB Comment Letter\_Biogas\_Electricity\_02.20.24\_BTR.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:25:41

No Duplicates.

**Comment 366 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Scott  
Last Name: Hedderich  
Email Address: scott.hedderich@nuseed.com  
Affiliation: Nuseed Americas

Subject: Proposed changes to the LCFS program  
Comment:

please see our attached comments

Attachment: '[www.arb.ca.gov/lists/com-attach/7046-lcfs2024-VDcHYABzAjMLUgRo.pdf](http://www.arb.ca.gov/lists/com-attach/7046-lcfs2024-VDcHYABzAjMLUgRo.pdf)'

Original File Name: CARB LCFS comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:26:37

No Duplicates.



**Comment 367 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Graham

Last Name: Noyes

Email Address: graham@noyeslawcorp.com

Affiliation: Noyes Law Corporation for H Cycle

Subject: LCFS Comment of H Cycle

Comment:

Attached please find the Low Carbon Fuel Standard comment of H Cycle. A short summary is included below. Thank you for the opportunity to provide this comment.

Best Regards,

Graham Noyes

Noyes Law Corporation

H Cycle, LLC ("H Cycle") is pleased to submit comments pertaining to the California Air Resources Board's ("CARB") proposed amendments to the Low Carbon Fuel Standard ("LCFS Proposal" or "Proposal"). We support CARB's LCFS program as it sends a powerful market signal to decarbonize the transportation sector, is performance based, and provides long-term policy stability that supports investment. However, we respectfully encourage CARB to take advantage of this LCFS rulemaking to make regulatory changes that incentivize deployment of low carbon intensity ("Low-CI") waste-to-hydrogen production facilities that can simultaneously catalyze more organics diversion, reduce emissions of the short-lived climate pollutant ("SLCP") methane, create a distributed hydrogen production network and drive federal dollars to California to accelerate hydrogen production expansion.

Attachment: 'www.arb.ca.gov/lists/com-attach/7048-lcfs2024-Vz9WD1Y0UHoKbwdr.pdf'

Original File Name: H Cycle LCFS Comment w Exhibits Final .pdf

Date and Time Comment Was Submitted: 2024-02-20 19:40:33

No Duplicates.

**Comment 368 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Allie  
Last Name: Wainer  
Email Address: awainer1@jh.edu  
Affiliation: Center for a Livable Future

Subject: Avoided methane crediting comment letter  
Comment:

The Center for a Livable Future submits the attached comment to CARB on the Low Carbon Fuel Standard, with particular attention to the avoided methane credits. We appreciate your consideration of our comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/7049-lcfs2024-Am5VMFYxBCQDWgFi.pdf'

Original File Name: LCFS Comment Letter 20240220.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:56:18

No Duplicates.

**Comment 369 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Dr. Rina

Last Name: Singh

Email Address: rina@altfuelchem.org

Affiliation: Alternative Fuels & Chemicals Coalition

Subject: Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

Attached are the comments from AFCC.

Attachment: '[www.arb.ca.gov/lists/com-attach/7050-lcfs2024-BmdTMwFjBzdQCVAz.pdf](http://www.arb.ca.gov/lists/com-attach/7050-lcfs2024-BmdTMwFjBzdQCVAz.pdf)'

Original File Name: AFCC Comments to CARB LCFS Amendments Final.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:53:41

No Duplicates.

**Comment 370 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Yaniv  
Last Name: Lewis  
Email Address: ylewis@xpansiv.com  
Affiliation:

Subject: Clearing Service Provider Five Day Holding Requirement Amendment  
Comment:

See attached.

Attachment: '[www.arb.ca.gov/lists/com-attach/7051-lcfs2024-Bn4HcVw8VmtRJAjr.pdf](http://www.arb.ca.gov/lists/com-attach/7051-lcfs2024-Bn4HcVw8VmtRJAjr.pdf)'

Original File Name: Xpansiv LCFS Comment Letter Feb 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:26:04

No Duplicates.

**Comment 371 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Julia  
Last Name: Tauszig  
Email Address: julia.tauszig@unica.com.br  
Affiliation: UNICA

Subject: UNICA Comments on LCFS Rulemaking  
Comment:

Thank you

Attachment: 'www.arb.ca.gov/lists/com-attach/7052-lcfs2024-BjRTZQc0VzBWYFdl.pdf'

Original File Name: 20240220\_UNICAcomments\_CARB.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:57:28

No Duplicates.

**Comment 372 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Martina  
Last Name: Simpkins  
Email Address: msimpkins@anewclimate.com  
Affiliation: Anew Climate

Subject: Comments on the Proposed LCFS Amendments  
Comment:

Please find enclosed comments from Anew Climate regarding the proposed amendments to the LCFS.

Attachment: 'www.arb.ca.gov/lists/com-attach/7053-lcfs2024-AGZUN1c0U19QZFdn.pdf'

Original File Name: Feb 20 CARB LCFS ISOR comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 19:28:11

No Duplicates.

**Comment 373 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Kyle  
Last Name: Berquist  
Email Address: kberquist@earthjustice.org  
Affiliation: Earthjustice

Subject: Comments from Earthjustice supporters  
Comment:

I am submitting comments on behalf of 1,398 additional Earthjustice supporters that were unable to file their public comments directly. Thank you for considering their opinions.

Sincerely,  
Kyle Berquist  
Senior Digital Advocacy Specialist  
Earthjustice

Attachment: 'www.arb.ca.gov/lists/com-attach/7055-lcfs2024-Uz8CdlwRnWTBYM0d.pdf'

Original File Name: kberquist-lcfs2024 comment.pdf

Date and Time Comment Was Submitted: 2024-02-20 20:17:24

No Duplicates.

**Comment 374 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Chris  
Last Name: Gould  
Email Address: Chris.Gould@CRC.com  
Affiliation: California Resources Corporation

Subject: Proposed 2024 Low Carbon Fuel Standard Amendments  
Comment:

Please see attached letter.

Attachment: '[www.arb.ca.gov/lists/com-attach/7056-lcfs2024-BmUFcQFjWVUCMFdi.pdf](http://www.arb.ca.gov/lists/com-attach/7056-lcfs2024-BmUFcQFjWVUCMFdi.pdf)'

Original File Name: CRC 45-day Comments on Proposed LCFS 02202024 .pdf

Date and Time Comment Was Submitted: 2024-02-20 20:20:43

No Duplicates.



**Comment 375 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Michael  
Last Name: Wara  
Email Address: mwara@stanford.edu  
Affiliation: Stanford University

Subject: Comment by Stanford Climate and Energy Policy Program participants  
Comment:

Thank you for considering this comment, prepared by members of the  
Climate and Energy Policy Program of the Stanford Woods Institute  
for the Environment.

Attachment: 'www.arb.ca.gov/lists/com-attach/7057-lcfs2024-AXJRI1c3UWwDY1I9.pdf'

Original File Name: Stanford CEPP LCFS Comments.pdf

Date and Time Comment Was Submitted: 2024-02-20 20:22:35

No Duplicates.

**Comment 376 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Robert  
Last Name: Parkhurst  
Email Address: rparkhurst@sierraviewssolutions.com  
Affiliation:

Subject: LCFS Coalition on Climate Smart Agriculture - UPDATED  
Comment:

Please see the attached comments from 19 companies on the inclusion of climate smart agriculture practices in a future LCFS rulemaking.

Please replace the letter submitted earlier today.

Attachment: 'www.arb.ca.gov/lists/com-attach/7059-lcfs2024-BWkAZVQzUHABWARn.pdf'

Original File Name: LCFS coalition on CSA FIXED.pdf

Date and Time Comment Was Submitted: 2024-02-20 20:27:07

No Duplicates.

**Comment 377 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Christine  
Last Name: Ball-Blakely  
Email Address: cblakely@aldf.org  
Affiliation:

Subject: LCJA et al. Comments on Proposed Amendments to LCFS  
Comment:

Please find a PDF of our comments attached. Note that the system will not accept the comments and exhibits in a zipped folder. We have attempted three times in two separate browsers to submit the comments and exhibits per the instructions below, which state: "If you have more than one attachment to upload, please put all of the attachments in a .ZIP file and send it." Each of our three submission attempts resulted in the same error message. Accordingly, we will be emailing our comments and a ShareFile link to the exhibits to the Clerk at cotb@arb.ca.gov. The exhibits are available for download via that ShareFile link, which is:  
<https://aldf.sharefile.com/public/share/web-sb900fcc4a3614def9843212d1a819087>.

Attachment: 'www.arb.ca.gov/lists/com-attach/7060-lcfs2024-WyhcNFA3AiIBcm0d.zip'

Original File Name: 2024.02.20 - LCJA et al. Comments on Proposed Amendments to LCFS.pdf

Date and Time Comment Was Submitted: 2024-02-20 20:11:18

No Duplicates.

**Comment 378 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Joshua  
Last Name: Wilson  
Email Address: Josh.Wilson@poet.com  
Affiliation: POET

Subject: POET's Comments On December 2023 Proposed Low Carbon Fuel Standard  
Amendments

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/7061-lcfs2024-BXVROAdjUHcBWABj.pdf'

Original File Name: POET Comment on LCFS Proposed Amendments 2.20.24\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-02-20 20:29:27

No Duplicates.

**Comment 379 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Don  
Last Name: Schinske  
Email Address: don@lcfcoalition.com  
Affiliation: Low Carbon Fuels Coalition

Subject: UPDATED letter: Low Carbon Fuels Coalition letter  
Comment:

Updated letter includes additional signers. Thank you!

Attachment: 'www.arb.ca.gov/lists/com-attach/7062-lcfs2024-BXAFcwFkWWsCcFA1.pdf'

Original File Name: UPDATED 240220 LCFC re. ICF Study update.pdf

Date and Time Comment Was Submitted: 2024-02-20 20:37:57

No Duplicates.

## **Comment 380 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Michael  
Last Name: O'Hare  
Email Address: ohare@berkeley.edu  
Affiliation: UC Berkeley

Subject: Low Carbon Fuel Standards Amendments  
Comment:

CARB's plans for assigning carbon intensity to biofuels greatly underestimate the real "carbon intensity" (climate warming effect of specific fuel uses) for all crop-sourced biofuels. The phenomenon of particular importance here, called ILUC for "indirect land use change", has been known and studied at least since 2008; I was the principal investigator of CARB contract research at the University of California when ILUC was incorporated into LCFS estimates. In simplest form, by processes well-known to CARB staff, withdrawing goods from world commodity markets (for example, soybean oil in the US) sets in motion price changes that induce increased production of similar or substitutable goods (for example, palm oil in Indonesia) elsewhere, on land whose conversion to crops (usually from forest or cerrado) releases very large greenhouse gas (GHG) discharges directly attributable to the food-to-biofuel diversion.

The GTAP economic model used by CARB to estimate indirect land use change is seriously and systematically flawed in ways detailed in the "Report on the Economic Basis for GTAP and Use of GTAP Style Models in Biofuel Land Use Modeling" by Steven Berry, Timothy Searchinger, and Anton Yang, from the Yale Tobin Center for Economic Policy. This report has been separately submitted to CARB by its authors. The effect of continuing to use GTAP to estimate biofuel carbon intensity undermines the intent of the LCFS and will displace real GHG reduction with increased fuel use that actually increases global warming, in addition to causing extremely damaging biodiversity loss and cultural injury, especially in tropical forests.

CARB would better serve the climate policy goals of the LCFS by scoring the actual carbon intensity of biofuels than using GTAP to estimate land use change effects. I urge CARB to attend carefully to Berry et al's critique and amend the LCFS carbon intensity scoring system accordingly.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-20 20:47:02

No Duplicates.



## **Comment 381 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Mary  
Last Name: Elizabeth  
Email Address: mebeth@outlook.com  
Affiliation:

Subject: LCFS

Comment:

Biofuel have better uses in the soil and I am speaking of manure and woody biomass. I live in Stockton where there is a biomass plant, DTE, which is the greatest source of stationary pollution. We live on this planet so when wood pellets from the US are used elsewhere we are contributing to global climate change - money is changing hands and the vulnerable suffer. There is a grey hydrogen plant that want to produce hydrogen from methane at the Port. Not enough requirements for mitigation and hydrogen interferes with the degradation of methane in the atmosphere. Any of these credits have to be phased out as soon as possible. I just received a notice of some organic oils being transported around to become biodiesel: MONTANA RENEWABLES, LLC. Full lifecycle analysis is needed now. Climate Change is now.

- Eliminate avoided methane crediting for fuel derived from livestock manure.
- Oppose Proposed LCFS Amendment Loophole to Allow Petroleum Projects with Carbon Capture & Storage Past the 2040 Phase-out.
- Conduct and incorporate a full life cycle assessment of all air pollution and greenhouse gas (GHG) emissions for all pathways, and their implications for environmental justice communities.
- Create ZEV multipliers to boost electric school bus and electric public transit bus and rail system deployments.
- Eliminate credit generation from factory farm gas projects that would have happened anyway due to other programs or investments.
- Include intrastate jet fuel as a deficit generator and include California's share of the fuel used in interstate and international flights.
- Allow credits for zero-emission transportation fuels used for ocean-going vessels and simplifying the process for credits for shore power installations serving electrified harbor crafts and for dispensing green hydrogen.

Attachment: "

Original File Name:



Date and Time Comment Was Submitted: 2024-02-20 20:36:15

No Duplicates.

**Comment 382 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Laura

Last Name: Haider

Email Address: lauragreen.rosenberger@gmail.com

Affiliation: Fresnans Against Fracking

Subject: Low carbon Fuel Standard

Comment:

No Subsidies for Fossil Fuel Projects with Carbon Capture: I oppose the proposed Low Carbon Fuel Standard (LCFS) amendment that would allow petroleum projects using carbon capture and storage (CCS) to continue to generate credits beyond the phase-out date of December 31, 2040. Carbon pipelines had leaked.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-20 20:50:32

No Duplicates.

## **Comment 383 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Peter

Last Name: Hawighorst

Email Address: hawighorst@enhancing-sustainability.com

Affiliation:

Subject: Feedback to the proposed Low Carbon Fuel Standard Amendments

Comment:

Ladies and Gentlemen,

Thank you for the opportunity to participate in this stakeholder consultation on the planned addition to the LCFS. We very much appreciate this opportunity. We are supporting the additional requirements for low carbon fuels as described in the draft document. In our view, this step is very important and will help to strengthen the program and its credibility in the long term. To further strengthen this initiative, we would like to recommend the following aspects:

- We think that it is helpful to set out more detailed guidelines for social and environmental criteria for the cultivation of sustainable feedstocks on farm level, e.g. to describe "good agricultural practices" or "best practice" for plant protection product application, working security, social standards, etc. Further, it would be important to have criteria for the long-term maintenance of soil fertility, as this is an essential factor for the long-term maintenance of production capacity and sustainability

- Clearer guidance on the verification process for farms would be beneficial, especially the option for group sampling on farm level to prove compliance with the set out requirements would help farmers to minimize audit efforts.

- Biodiverse land areas as well as peat and wetlands should be protected as those areas are crucial for preserving biodiversity. They should be "fully" protected if not used for agricultural production in the last years, or at least restrictions on their use should be defined to preserve them.

- We think that it would be beneficial to cooperate with established certification schemes. The Board can implement a process for the recognition of qualified certification schemes who then cooperate with certification bodies to conduct the verification processes in the future. This set-up would be helpful for the Board, as it ensure a credible verification process for the set out requirements as it helps to:

- a) establish a "triangle" between the certification bodies, economic operators and the schemes with clear roles and responsibilities ("balance of power"), to ensure a global, transparent and independent verification process, a conflict of interest-free auditing framework provided by the certification

schemes and ensuring the transformation of the certification requirements into practical audit documents, checklists and guidelines via the scheme

- b) enable a regional and technical multi-stakeholder dialogue
- c) enable the scheme to set up a training and qualification program for certification bodies, auditors and economic operators
- d) support the continuous management and improvement of the certification set-up by the scheme
- e) ensure the ability to run the scheme for global supply chains
- f) establish and improve credibility via whistleblower tools, companies and grievance mechanisms established and an integrity program which is overseeing and monitoring auditor performance and economic operators

We support the stakeholder process and are very grateful for the opportunity to provide feedback on the planned project in this way. we would be delighted if our feedback was taken into account. Please do not hesitate to contact us if you have any questions.

With best regards  
Peter Hawighorst

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-20 20:45:28

No Duplicates.

**Comment 384 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Dan  
Last Name: Willis  
Email Address: dwillis@sflower.org  
Affiliation: San Francisco Pub Utilities Commission

Subject: SFPUC, SFMTA, SF Airport - LCFS Rulemaking Comments  
Comment:

Thank you for considering the attached joint comments from the San Francisco Public Utilities Commission, the San Francisco Municipal Transportation Agency, and the San Francisco International Airport.

Attachment: 'www.arb.ca.gov/lists/com-attach/7068-lcfs2024-AHNWNIAhByEGYwIW.pdf'

Original File Name: SFPUC\_CARB\_LCFS\_Comments\_022024.pdf

Date and Time Comment Was Submitted: 2024-02-20 21:17:18

No Duplicates.

**Comment 385 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Luke

Last Name: Nguyen

Email Address: [Inguyen1@idemitsu.com](mailto:Inguyen1@idemitsu.com)

Affiliation: Idemitsu Apollo Renewable Corporation

Subject: Comments on Proposed LCFS Program Amendments

Comment:

Please see our attached comments on CARB's proposed amendments to the Low Carbon Fuel Standard program. Thank you for the opportunity to provide these comments.

Attachment: '[www.arb.ca.gov/lists/com-attach/7069-lcfs2024-UTgBY1czAjwHaFMn.pdf](http://www.arb.ca.gov/lists/com-attach/7069-lcfs2024-UTgBY1czAjwHaFMn.pdf)'

Original File Name: Idemitsu Public Comment.pdf

Date and Time Comment Was Submitted: 2024-02-20 21:31:41

No Duplicates.

**Comment 386 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Teresa

Last Name: Bui

Email Address: tbui@pacificenvironment.org

Affiliation: Pacific Environment

Subject: Pacific Environment's Comments on 2024 LCFS Amendments

Comment:

Please see attached comments from Pacific Environment's comments on  
2024 LCFS Amendments. Thank you for your consideration.

Attachment: 'www.arb.ca.gov/lists/com-attach/7070-lcfs2024-VCQFZgRaUW4BZFUz.pdf'

Original File Name: PE LCFS comment to CARB Feb 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 21:46:04

No Duplicates.

**Comment 387 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: John  
Last Name: O'Donnell  
Email Address: john@rondo.com  
Affiliation: Rondo Energy

Subject: Rondo Energy Comments  
Comment:

Attached

Attachment: 'www.arb.ca.gov/lists/com-attach/7071-lcfs2024-UyFSO1M8V2AKYwZZ.pdf'

Original File Name: Rondo LCFS Feb 2024 Comment Letter-final.pdf

Date and Time Comment Was Submitted: 2024-02-20 21:55:29

No Duplicates.



**Comment 388 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Phoebe

Last Name: Seaton

Email Address: pseaton@leadershipcounsel.org

Affiliation: Leadership Counsel

Subject: CORRECTED - Community, EJ, Environmental Justice Response to ISOR and Staff Proposal Comm

Comment:

Please accept these comments as the corrected comments of approximately 35 Environmental Justice, Community-Base, Environmental and Labor organizations. I submitted an outdated letter earlier this evening (at approximately 5 p.m.) in error.

Thank you so much,

- Phoebe

Attachment: 'www.arb.ca.gov/lists/com-attach/7072-lcfs2024-BmVTOl0uVHUBYglq.pdf'

Original File Name: CORRECTED - Community-Based, EJ, and Environemntal Advocate Response to Staff Proposal.pdf

Date and Time Comment Was Submitted: 2024-02-20 21:56:41

No Duplicates.

**Comment 389 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Shannon  
Last Name: Broome  
Email Address: sbroome@huntonak.com  
Affiliation: Hunton Andrews Kurth

Subject: Comments of Highly Innovative Fuels USA  
Comment:

Please find attached the comments of Highly Innovative Fuels USA on the proposed amendments to the LCFS. Please contact me with any questions regarding these comments.

Shannon S. Broome

Attachment: 'www.arb.ca.gov/lists/com-attach/7073-lcfs2024-BTdXYVRnWT4GLVJi.pdf'

Original File Name: 2024-02-20 As Filed HIF USA Comments on CARB LCFS Proposed Amendments.pdf

Date and Time Comment Was Submitted: 2024-02-20 22:02:55

No Duplicates.

**Comment 390 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Matthew

Last Name: Sheets

Email Address: msheets@landstewardshipproject.org

Affiliation:

Subject: Land Stewardship Project Public Comment to CARB

Comment:

Hello,

Please find our public comment attached. We appreciate the opportunity to offer comment and I would be happy to answer any clarifying questions you have.

Best,

Matthew Sheets

Attachment: 'www.arb.ca.gov/lists/com-attach/7075-lcfs2024-Uz8FcFQIUFWLfQB1.pdf'

Original File Name: LSP Public Comment to CARB Feb 2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 22:10:53

No Duplicates.

**Comment 391 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Nicole

Last Name: Rice

Email Address: nicolerice@ca-rta.org

Affiliation: CA Renewable Transportation Alliance

Subject: CRTA Comment Letter on Proposed Amendments to LCFS

Comment:

We appreciate this opportunity to submit these comments on the Proposed Amendments to the Low Carbon Fuel Standards program. Thank you for your consideration of our position.

Attachment: 'www.arb.ca.gov/lists/com-attach/7076-lcfs2024-BmUCdlwpWWsFXFc7.pdf'

Original File Name: CRTA\_LCFS Comment Letter\_Final - Feb 20 24.pdf

Date and Time Comment Was Submitted: 2024-02-20 22:16:47

No Duplicates.

**Comment 392 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Sasan  
Last Name: Saadat  
Email Address: ssaadat@earthjustice.org  
Affiliation: Earthjustice

Subject: Comments on Proposed Amendments to the LCFS  
Comment:

Earthjustice comments on the proposed amendments to the LCFS  
attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/7077-lcfs2024-Wz4BZgd0BCNVOWJo.pdf'

Original File Name: Earthjustice- LCFS ISOR Comments Feb 20 2024 (1).pdf

Date and Time Comment Was Submitted: 2024-02-20 22:25:04

No Duplicates.

**Comment 393 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Philip  
Last Name: Sheehy  
Email Address: philip.sheehy@icf.com  
Affiliation:

Subject: ICF Analysis of LCFS Staff Report: Initial Statement of Reasons  
Comment:

ICF is a non-partisan, non-political company that delivers a broad and diverse range of independent, unbiased, objective analyses and related consulting services to help its clients meet their missions.

ICF has supported a coalition of interested parties representing a diverse mix of low carbon fuel producers seeking to understand the potential carbon intensity (CI) reduction that could be achieved via California's Low Carbon Fuel Standard (LCFS) program assuming the likely aggregate deployment of low carbon fuels and supporting technologies. Through a consideration of various factors, the project has sought to quantify what CI target may be achievable in 2030 and provide analytical insights regarding other aspects of the proposed amendments to the LCFS program. ICF's work should not be construed as ICF's endorsement of any policy or any regulatory, lobbying, legal, or other advocacy position, organization, or political party. Furthermore, any conclusions presented by ICF do not necessarily represent the policy or political views of ICF. ICF's most recent report, entitled Analyzing Low Carbon Fuel Targets in California, Response to Staff Report, is attached.

Attachment: '[www.arb.ca.gov/lists/com-attach/7078-lcfs2024-VDVcNFIyVGsLdFQu.pdf](http://www.arb.ca.gov/lists/com-attach/7078-lcfs2024-VDVcNFIyVGsLdFQu.pdf)'

Original File Name: Analyzing Low Carbon Fuel Targets - ISOR Analysis 240214 FINAL.pdf

Date and Time Comment Was Submitted: 2024-02-20 22:41:18

No Duplicates.

**Comment 394 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Matt  
Last Name: Bright  
Email Address: mbright@carboncapture.com  
Affiliation: CarbonCapture Inc.

Subject: Proposed Amendments to the LCFS Regulation  
Comment:

Please see the attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/7079-lcfs2024-UT0AZVYxBCQLUgZi.pdf'

Original File Name: LCFS DAC Quarterly Matching Comment\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-02-20 22:51:15

No Duplicates.

## **Comment 395 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Mark  
Last Name: Hansen  
Email Address: mhansen@ce.berkeley.edu  
Affiliation: UC Berkeley

Subject: Comments of Alternative Jet Fuel - Proposed Amendments to the Low Carbon Fuel Standard

Comment:

Dear California Air Resources Board,

Thank you for the opportunity to submit comments on the proposed amendments to the Low Carbon Fuel Standard (LCFS). We have been actively engaged in researching how to promote aviation decarbonization in California, focusing on both technical feasibility and policy implications. Sustainable aviation fuel (SAF) or alternative jet fuel is one of our main areas of focus. Based on our research, our comments on the proposed amendments to the LCFS are twofold, addressing both policy analysis and legal considerations.

### Policy Analysis

We conducted policy analyses for both 2030 and 2035 using a supply and demand framework. The jet fuel price forecast is \$16.44 per million Btu for 2030 and \$17.77 per million Btu for 2035, based on EIA forecasts. Our supply model for alternative jet fuel use (SAF) is based on the California Transportation Supply Model (CATS), while the demand curve is established using a log-log model incorporating total jet fuel demand and fuel prices, along with fuel price elasticities. We considered two scenarios for jet fuel price elasticity: -0.03 for short-term price responses and -0.35 for long-term responses.

Three scenarios were evaluated: the baseline scenario, consistent with the existing design of the LCFS without eliminating the jet fuel exemption from fossil jet fuels; the proposed scenario, based on proposed amendments to the LCFS with the elimination of the jet fuel exemption from intrastate fossil jet fuels; and the enhanced scenario, considering the elimination of the jet fuel exemption from domestic fossil jet fuels (both intrastate and interstate). Under the proposed and enhanced scenarios, we evaluated both cases where the carbon intensity standard (benchmark) reduces as stated in the proposal (Low CIstandard) and cases where the carbon intensity standard does not reduce (High CIstandard), reflecting the current policy.

The following tables show the change in the total demand, SAF consumption, CO<sub>2</sub>e emission, and environmental impacts under various scenarios and assumptions regarding jet fuel elasticity.

Based on the results, our main three observations are as follows:  
1. Effectiveness of carbon intensity standards: Strengthening the annual carbon intensity benchmarks in the aviation sector as



proposed may not be as effective as maintaining the current higher carbon intensity standard.

2. Scope of exemptions for fossil jet fuel: Eliminating the exemption for domestic fossil jet fuel (both intrastate and interstate) appears to be more beneficial than eliminating it for intrastate only.

3. Influence of jet fuel elasticity: Jet fuel elasticity significantly influences the outcomes, highlighting its importance in policy formulation.

#### Legal Considerations

While we are not trained lawyers, our research background includes several studies that involved understanding legal constraints pertaining to taxes and fees imposed on airlines and air transportation. Based on this knowledge and a review of relevant case law, we offer a few observations:

The LCFS is sometimes viewed as an "implicit tax." If extending the LCFS to incorporate jet fuel were considered a form of airline taxation, then it would be subject to strict limitations. According to 64 Fed. Reg. 7696, which implements the several federal statutes:

"State or local taxes on aviation fuel (except taxes in effect on December 30, 1987) are considered to be airport revenue subject to the revenue-use requirement. However, revenues from state taxes on aviation fuel may be used to support state aviation programs or for noise mitigation purposes, on or off the airport."

This would seem to preclude the use of LCFS revenue to pay for credits. Notably, this restriction would apply irrespective of whether the LCFS was applied to fuel for intrastate flights only or a larger set of flights.

If the LCFS is not considered a form of airline taxation, then the most significant legal constraint is the Dormant Commerce Clause. Here, the application of the LCFS to interstate flights might be considered to violate the DCC. However, the issue is by no means clear cut. Since the LCFS has been held not to be discriminatory against out-of-state businesses, the question would be whether the state interests it promotes offset the burden it places on interstate commerce. There is ample precedent that controlling global warming is a legitimate state interest, which increases the possibility that an LCFS that applies to all domestic flights would survive a DCC challenge.

Sincerely,

Professor Mark Hansen

Department of Civil and Environmental Engineering, UC Berkeley  
Co-Director, National Center of Excellence for Aviation Operations  
Research

Yati Liu, Ph.D. Student

Department of Civil and Environmental Engineering, UC Berkeley

Attachment: 'www.arb.ca.gov/lists/com-attach/7080-lcfs2024-VTYGb1E9VmgBYgdp.pdf'

Original File Name: Comment letter to CARB.pdf

Date and Time Comment Was Submitted: 2024-02-20 23:14:43

No Duplicates.

**Comment 396 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Paul D.  
Last Name: Hernandez  
Email Address: phernandez@volterapower.com  
Affiliation: Voltera

Subject: Comments of Voltera on the Proposed Low Carbon Fuel Standard Amendments  
Comment:

California Air Resources Board Members and Staff,

Voltera appreciates the opportunity to provide these, "Comments of Voltera on the Proposed Low Carbon Fuel Standard Amendments" to the California Air Resources Board, in response to the proposed Low Carbon Fuel Standard Amendments.

Please reach out with any questions or for clarification regarding these comments.

Respectfully submitted,

Paul D. Hernandez

Sr. Policy Manager, Government and Utility Relations  
Voltera  
E-mail: phernandez@volterapower.com

Attachment: '[www.arb.ca.gov/lists/com-attach/7081-lcfs2024-W2liUWBjWGoQCm0d.pdf](http://www.arb.ca.gov/lists/com-attach/7081-lcfs2024-W2liUWBjWGoQCm0d.pdf)'

Original File Name: Comments of Voltera on the Proposed LCFS Amendments, Filed 2.20.2024 PDF.pdf

Date and Time Comment Was Submitted: 2024-02-20 23:18:25

No Duplicates.

**Comment 397 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: Pacific Gas & Electric

Subject: PG&E Comments on 45-day LCFS Amendments

Comment:

See attached

Attachment: 'www.arb.ca.gov/lists/com-attach/7082-lcfs2024-BmpRNFUyUnIEXQM3.pdf'

Original File Name: LCFS\_45-Day Comments\_PGE\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-02-20 23:34:12

No Duplicates.

**Comment 398 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Daniel  
Last Name: Chandler  
Email Address: dwchandl@gmail.com  
Affiliation: 350 Humboldt

Subject: Comments on LCFS Amendments 2\_20\_2024  
Comment:

Please see attached file.

Attachment: 'www.arb.ca.gov/lists/com-attach/7083-lcfs2024-AW0AYwdyACcAYwJw.pdf'

Original File Name: Letter CARB Board LCFS Amendments 2\_20\_2024.pdf

Date and Time Comment Was Submitted: 2024-02-20 23:35:34

No Duplicates.

**Comment 399 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Angela  
Last Name: Richards  
Email Address: arichards@monarchtractor.com  
Affiliation:

Subject: Comments in anticipation of the Public Hearing to Consider Proposed LCFS  
Amendments

Comment:

Please see attached letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/7084-lcfs2024-W2lXf1xvUzBQCVc7.pdf'

Original File Name: 2.20 LCFS Comments Monarch Tractor.pdf

Date and Time Comment Was Submitted: 2024-02-20 23:47:19

No Duplicates.

**Comment 400 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Colin  
Last Name: Murphy  
Email Address: cwmurphy@ucdavis.edu  
Affiliation: UC Davis Policy Institute

Subject: Comments on LCFS 45 Day Amendment Package  
Comment:

Hello,

On behalf of my colleagues at the UC Davis Policy Institute, please find attached a ZIP file with our comment letter, and three recent reports on LCFS modeling.

Please do not hesitate to reach out if there are any questions.

Thank you,

Colin Murphy

Attachment: 'www.arb.ca.gov/lists/com-attach/7085-lcfs2024-Wi9QNQNdAzRXMAF3.zip'

Original File Name: UC Davis LCFS Comments and Material - 20 Feb 2024.zip

Date and Time Comment Was Submitted: 2024-02-20 23:54:04

No Duplicates.

## **Comment 401 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Tess

Last Name: Dornfeld

Email Address: tedornfeld@gmail.com

Affiliation:

Subject: Stop propping up fossil fuels and climate scams

Comment:

It is extremely difficult not to throw up my hands and give in to cynicism when a policy supposedly meant to lower carbon emissions is in fact incentivizing more fossil fuel production, more pipelines, more CAFOs, more food crops diverted to fuel.

I spent most of 2021 fighting to stop a new tar sands pipeline here in Minnesota, only to learn that the next pipeline proposals threatening our water, our land, our safety and our health are carbon pipelines, carrying emissions from ethanol plants to North Dakota to be used for Enhanced Oil Recovery. I didn't know much about any of these things at the time, but one fact stuck with me: the ethanol producers need to lower their carbon intensity so they can take advantage of California's LCFS.

It's not rocket science to know that when carbon emissions are being sent to an area known above all else for fossil fuel production, that's how it's going to be used. But even if you're gullible enough to believe the hype about CCS - after years of empty promises and no time left to be proven wrong - propping up ethanol with this policy is no better anyway.

There's no possible way to justify incentivizing a fuel that's at least as bad and up to 24% worse than gasoline in carbon intensity. What is the point of the LCFS? If it's to make money off harming small farmers in Minnesota, off the trafficking of Native women and girls during pipeline construction, off destroying rural water sources with pollution and overuse, then job well done.

You have more than enough information to address the damage of the LCFS when it comes to ethanol and CCS, and methane crediting, lifecycle assessment, and factory farm biogas. This is your "what did you do when you had the chance" moment. It might not seem like the most glamorous one, but it matters a hell of a lot to all of us whose lives are directly impacted by your decisions.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2024-02-20 23:57:49

No Duplicates.





**Comment 402 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: John  
Last Name: Thornton  
Email Address: john@CleanFuture.us  
Affiliation: CleanFuture, Inc.

Subject: Comments to LCFS Draft Rules of 19 Dec 2023  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/7087-lcfs2024-VDdTOQdjWGoCagZg.pdf'

Original File Name: CleanFuture Comment RE LCFS draft rules posed Dec 19 2023.pdf

Date and Time Comment Was Submitted: 2024-02-20 23:59:09

No Duplicates.

**Comment 403 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Barry  
Last Name: Sedlik  
Email Address: barry.sedlik@calbizventures.com  
Affiliation: California Business Ventures

Subject: Comments on LCFS2024  
Comment:

Please see attached file.

Attachment: 'www.arb.ca.gov/lists/com-attach/3-0-BnVXNABIBTpQP1A7.pdf'

Original File Name: sedlikcomment.pdf

Date and Time Comment Was Submitted: 2024-02-21 11:24:10

No Duplicates.

**Comment 404 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 45 Day.**

First Name: Caroline

Last Name: Hobbs

Email Address: chobbs@portofsandiego.org

Affiliation: Port of San Diego

Subject: Port of San Diego LCFS Amendments Letter of Support

Comment:

Please attached document

Attachment: 'www.arb.ca.gov/lists/com-attach/4-0-B2RRNIIhBDhXPVc+.pdf'

Original File Name: Caroline Hobbs - LCFS Comment - Signed 2.20.24 Support Proposed Low Carbon Fuel.pdf

Date and Time Comment Was Submitted: 2024-02-21 12:01:34

No Duplicates.

**Comment 405 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Kristina

Last Name: Gallagher

Email Address: kgallagher@counties.org

Affiliation: California State Association of Counties

Subject: CSAC Comments - Proposed Low Carbon Fuel Standard

Comment:

Hello - Please see the attached California State Association of Counties (CSAC) letter on the Proposed Low Carbon Fuel Standard Amendments.

Attachment: '[www.arb.ca.gov/lists/com-attach/5-0-BW5TJ1E5UXFQIglg.pdf](http://www.arb.ca.gov/lists/com-attach/5-0-BW5TJ1E5UXFQIglg.pdf)'

Original File Name: Kristina Gallagher - LCFS Comment.pdf

Date and Time Comment Was Submitted: 2024-02-21 12:18:30

No Duplicates.

**Comment 406 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Susana  
Last Name: Gonzalez Edmond  
Email Address: susana@edmondgroupllc.com  
Affiliation: Edmond Group

Subject: Public Comment for Proposal to Regulate Jet Fuel  
Comment:

Please see attached file. Submitted on behalf of commenter having technical difficulties by Clerk of the Board.

Attachment: 'www.arb.ca.gov/lists/com-attach/7-0-B2ICYFY6VGgAaAJm.pdf'

Original File Name: edmondcomment1.pdf

Date and Time Comment Was Submitted: 2024-02-21 15:58:00

No Duplicates.

**Comment 407 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 45 Day.**

First Name: Brittany  
Last Name: Benesi  
Email Address: brittany.benesi@aspc.org  
Affiliation: ASPCA

Subject: LCFS 2024 Comments - ASPCA  
Comment:

Please see attached letter.

Comment was submitted to LCFSWorkshop@arb.ca.gov on 2/16/24.

Attachment: 'www.arb.ca.gov/lists/com-attach/4-cosip23-WzoAdv0sWWkCZQIW.pdf'

Original File Name: ASPCA\_CARB LCFS Comment Feb 2024.pdf

Date and Time Comment Was Submitted: 2024-02-27 14:56:04

No Duplicates.

**There are no comments posted to Proposed Low Carbon Fuel Standard Amendments (lcfs2024) that were presented during the Board Hearing at this time.**