

**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'

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@ekaelc.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: Butenhoff

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'

Original File Name: VES Letter to CARB - Ratchet 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'

Original File Name: MIS Letter to CARB - LCFS Credit Price & Ratchetting 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-WytTIANgV2hRPgBj.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'

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: Senergy, 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-USIBYl0yAzUDd1A3.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-UD9WIFQlAj5VIAIg.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 resporce. 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'

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](mailto: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: Prah

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: ocar2015@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

Affiliation:

Subject: Shell Comments on LCFS Amendments

Comment:

Attachment: '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-VjUFYAdnBQlVMAlm.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

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'

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@llbbl.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: Sendler

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: thesro15@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-UCNWJQdkUXdRJVAy.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'

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'

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'

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) --  $(2.147 / 2.171 \text{ Mt CO}_2 = 0.99) \div [(67/105 \text{ bpd} = 0.64) - \text{to} - (67/120 \text{K(capacity)} \text{ bpd} = 0.56)] = \sim (1.54 - \text{to} - 1.76) / 1.00$   
Marathon: ~77% (relative increase from baseline) --  $(2.169 / 1.145 \text{ MtCO}_2 = 0.53) \div (48 \text{K} / 160 \text{K(capacity)} \text{ bpd} = 0.3) = 0.53 / 0.3 = \sim 1.77 / 1.00$

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.ucsusa.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-VyVVMIYyVloCZ1M8.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, make 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'

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'

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: Tjiong

Email Address: carol.tjiong@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-AjBTZQQ3BGNWD1Vl.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](mailto: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](http://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-UGJWYFxxBGMFLQQ2.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'

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-BTdUYgc0B2AHXlA3.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@CalETC.com

Affiliation:

Subject: EVCA-CalETC joint comments on proposed 2024 LCFS

Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/6859-lcfs2024-VDEAcFAyWGoKIQVm.pdf'

Original File Name: EVCA-CalETC 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'

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](mailto: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](http://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-UTRUIA0V2dXJQI7.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-VDJUPVUxB3lWMwdo.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](mailto: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](http://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  
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/8jcli9f2vwyof9cbqlqx5sna1m0d0hsb>

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'

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 Amendments  
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@hiiroc.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-AmEAZ1MmU2YEXVMMy.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-AWBRllnBztSC1I7.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: jmmoore@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'

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'

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-WzdUMVI1U3NWDwRn.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'

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-B2RROFA8Az0FZlA+.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: Vervae

Email Address: chris.vervae@copacanada.com

Affiliation: chris.vervae@copacanada.com

Subject: Canadian canola industry submission

Comment:

Comments enclosed

Attachment: 'www.arb.ca.gov/lists/com-attach/6932-lcfs2024-UTJRPwNwWGIAAdQVa.pdf'

Original File Name: Chris Vervae - 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-UTIBZlQnWGkGX1c0.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'

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: Tsuwaki

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: Korbato

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 M CCS 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'

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

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'

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-VTITNl06VHQHXglh.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'

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-UidTNl0vBwtXDlQ6.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-AmEHYFAjVGVRCAnh.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'

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](mailto: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-BWYCZVM+BTRWOVI9.pdf](http://www.arb.ca.gov/lists/com-attach/6967-lcfs2024-BWYCZVM+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-nVDdlXf1yACVYm0D.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-B2lUN1YkACcLaARb.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-BmVcNVQ4V2lQMwdp.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

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'

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

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'

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'

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-UzAAaQdrAjxVNgJs.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 America, 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'

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.ccom  
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-VDhQNVAAw8FZQF0.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'

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'

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'

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-UWMHMOVdkB2RReQg4.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 supports 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-Wi4GZV0vBAGAgdk.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

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-W2lUYlFiAGcAKwY2.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-UWMAMlVkUTAKPQk9.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 farm 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-VDdWNl06UmQGxwBj.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-B2VdMlA+AjcFdlA1.pdf'

Original File Name: Biofuelwatch\_LCFSRulemaking\_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 signal to decarbonize the transportation sector, is performance 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'

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-Wyhco1A3Ag5RMAV3.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'

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'

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](mailto: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](http://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'

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'

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'

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'

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@sierravIEWSolutions.com](mailto:rparkhurst@sierravIEWSolutions.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](http://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: Fresnoans 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@sfgwater.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: lnguyen1@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'

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'

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'

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: dwchndl@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 out 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](mailto: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](http://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'

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@aspca.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-WzoAdV0sWWkCZQlW.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.

**Comment 408 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: Suburban Propane - Comments on Modifications to the Proposed LCFS Amendments  
Comment:

Attachment: 'www.arb.ca.gov/lists/com-attach/7289-lcfs2024-VCddLIIXVHILf1Mx.pdf'

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

Date and Time Comment Was Submitted: 2024-08-21 14:14:14

No Duplicates.



## **Comment 1 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Andrew

Last Name: Dunlop

Email Address: adunlop22@yahoo.com

Affiliation: Lifelong Californian

Subject: LCFS Reform

Comment:

Please do not approve any more fuel price increases based on LCFS standards. We, the average Californian consumers, can no longer afford any further increases to our cost of living. Home and property insurance has skyrocketed and there is no relief or leadership on this matter. Property tax increases every year. Food and household goods are double what they were in 2020. The cost to register our cars increases every year. Utility bills have gone up to scary levels. We already pay the highest fuel cost in the nation and this would only be a regressive tax that negatively affects the lower middle class, working class and the working poor. This is all unsustainable unless CARB also advocates for some sort of fuel cost subsidy for Californians making less than 120k per year, which is a fantasy. So, in lieu of further insanity, please just vote "NO" on any further fuel tax increases.

A. Dunlop

Murrieta, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-07 09:54:24

No Duplicates.

**Comment 2 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Chelsey

Last Name: Robinson

Email Address: chelsey.robinson@bayer.com

Affiliation:

Subject: Bayer Comments to Governing Board

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8094-lcfs2024-B2UCZVYuVGJXI1UK.pdf](http://www.arb.ca.gov/lists/com-attach/8094-lcfs2024-B2UCZVYuVGJXI1UK.pdf)

Original File Name: Bayer Comments to Governing Board\_Final\_Nov7.pdf

Date and Time Comment Was Submitted: 2024-11-07 11:14:55

No Duplicates.

**Comment 3 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Heather

Last Name: Spring

Email Address: Heather\_Spring@pashanet.com

Affiliation:

Subject: The Pasha Group Comments on Proposed LCFS Amendments

Comment:

See attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/8095-lcfs2024-BXVSNVwuADsFYgZZ.pdf](http://www.arb.ca.gov/lists/com-attach/8095-lcfs2024-BXVSNVwuADsFYgZZ.pdf)

Original File Name: Pasha Group\_LCFS Letter\_Nov 2024\_Final.pdf

Date and Time Comment Was Submitted: 2024-11-07 11:46:56

No Duplicates.

**Comment 4 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Robin

Last Name: Vercruse

Email Address: robin@lcfcoalition.com

Affiliation: Low Carbon Fuels Coalition

Subject: Support letter from the Low Carbon Fuels Coalition

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8096-lcfs2024-B2sGYwBnU2MEXQNv.pdf](http://www.arb.ca.gov/lists/com-attach/8096-lcfs2024-B2sGYwBnU2MEXQNv.pdf)

Original File Name: LCFC letter to CARB Board.pdf

Date and Time Comment Was Submitted: 2024-11-07 12:30:45

No Duplicates.

## **Comment 5 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Susan

Last Name: S

Email Address: Susansden@yahoo.com

Affiliation:

Subject: Stop New Low Carbon Fuel Standard

Comment:

Californians already pay TOO MUCH for fuel - the highest prices in the nation. This new regulation will make gas even MORE UNAFFORDABLE. We're already struggling significantly because of high prices.

I urge the governor to take action against gas prices going even higher.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-07 12:50:10

No Duplicates.

## **Comment 6 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Susan

Last Name: S

Email Address: Susansden@yahoo.com

Affiliation:

Subject: Stop New Low Carbon Fuel Standard

Comment:

Californians already pay TOO MUCH for fuel - the highest prices in the nation. This new regulation will make gas even MORE UNAFFORDABLE. We're already struggling significantly because of high prices.

I urge the governor to take action against gas prices going even higher.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-07 12:50:10

No Duplicates.

## **Comment 7 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Susan

Last Name: S

Email Address: Susansden@yahoo.com

Affiliation:

Subject: Stop New Low Carbon Fuel Standard

Comment:

Californians already pay TOO MUCH for fuel - the highest prices in the nation. This new regulation will make gas even MORE UNAFFORDABLE. We're already struggling significantly because of high prices.

I urge the governor to take action against gas prices going even higher.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-07 12:50:10

No Duplicates.

## **Comment 8 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Eli

Last Name: Komai

Email Address: k.l.k.washing@gmail.com

Affiliation:

Subject: LCFS = DISASTER

Comment:

Members of the board, please consider the following carefully:

1. You can forget about meeting United Nations goals. The great state of California is simply too big. It is impossible. The harder you try to "catch up" to the timetables, the more you will be resisted by families and businesses across the Golden State.
2. The United Nations' International Panel on Climate Change (IPCC) has been exposed, repeatedly, for using fraudulent figures. This fraud is then perpetrated on millions of taxpayers. Do not get caught up in this fraud, stand for your state, the people of California need you to do the right thing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-07 12:39:46

No Duplicates.



## **Comment 9 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Laurie

Last Name: Souza

Email Address: lauriesouzatmr@gmail.com

Affiliation:

Subject: LCFS

Comment:

Our currant gas prices in California and regulations are crushing the people. This has to stop. I have a son who is driving 45 minutes away from his home and family to work. More increases of gas pricing will cause many to lose their jobs because they will not be able to afford to drive. Stop This NONSENCE!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 07:56:35

No Duplicates.

**Comment 10 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Roxana

Last Name: Bekemohammadi

Email Address: roxana@ushydrogenalliance.org

Affiliation: United States Hydrogen Alliance

Subject: RE: Notice of Public Hearing to Consider Proposed Low Carbon Fuel Standard  
Amendments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8102-lcfs2024-VSAGc1E4UWMEXVc7.pdf](http://www.arb.ca.gov/lists/com-attach/8102-lcfs2024-VSAGc1E4UWMEXVc7.pdf)

Original File Name: USHA\_LCFS\_Comment\_Letter.pdf

Date and Time Comment Was Submitted: 2024-11-08 07:58:52

No Duplicates.

## **Comment 11 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Sharon

Last Name: Cooney

Email Address: Sharon.Cooney@sdmts.com

Affiliation: San Diego Metropolitan Transit System

Subject: MTS Letter of Support - LCFS Amendments

Comment:

MTS letter of support for LCFS amendments is attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8103-lcfs2024-W2kFM1FiVTILIAk4.pdf](http://www.arb.ca.gov/lists/com-attach/8103-lcfs2024-W2kFM1FiVTILIAk4.pdf)

Original File Name: 2024-11-05 MTS Letter of Support - LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2024-11-08 08:14:16

No Duplicates.

**Comment 12 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Will

Last Name: Drier

Email Address: wdrier@electrificationcoalition.org

Affiliation: Electrification Coalition

Subject: Comments in support of proposed amendments

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/8104-lcfs2024-VTBVPwZiUWFRI1Ig.pdf](http://www.arb.ca.gov/lists/com-attach/8104-lcfs2024-VTBVPwZiUWFRI1Ig.pdf)

Original File Name: Electrification Coalition - Letter of Support for CARB LCFS  
Amendments\_11082024.pdf

Date and Time Comment Was Submitted: 2024-11-08 08:14:19

No Duplicates.

## **Comment 13 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Adam

Last Name: Browning

Email Address: [abrowning@forummobility.com](mailto:abrowning@forummobility.com)

Affiliation: Joint HD Infrastructure Providers

Subject: Support for YES vote on LCFS amendments

Comment:

Attached please find a support letter from coalition of leading MHD charging infrastructure providers, requesting a yes vote on the Low Carbon Fuel Standard reform package scheduled for the November 8 Board meeting.

Attachment: [www.arb.ca.gov/lists/com-attach/8105-lcfs2024-Am9QPIM2UFwAalQ3.pdf](http://www.arb.ca.gov/lists/com-attach/8105-lcfs2024-Am9QPIM2UFwAalQ3.pdf)

Original File Name: MHD LCFS Nov 8 Board Support Letter - FINAL.pdf

Date and Time Comment Was Submitted: 2024-11-08 08:21:35

No Duplicates.

**Comment 14 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Bang

Last Name: Phung

Email Address: bang.phung@ladwp.com

Affiliation:

Subject: LADWP Comment on LCFS Amendments

Comment:

Please see attached for LADWP's comment.

Attachment: [www.arb.ca.gov/lists/com-attach/8106-lcfs2024-B2JcKQY1WD9XfAEx.pdf](http://www.arb.ca.gov/lists/com-attach/8106-lcfs2024-B2JcKQY1WD9XfAEx.pdf)

Original File Name: ES24-0543 LADWP LCFS Comment Letter Second 15-Day Change  
FINAL KR.pdf

Date and Time Comment Was Submitted: 2024-11-08 08:34:53

No Duplicates.

**Comment 15 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: James

Last Name: Duffy

Email Address: duffje@msn.com

Affiliation: Former LCFS Branch Chief

Subject: A Transparent Discussion of LCFS Costs

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8107-lcfs2024-UzIFXFQhWHIRNII8.pdf](http://www.arb.ca.gov/lists/com-attach/8107-lcfs2024-UzIFXFQhWHIRNII8.pdf)

Original File Name: A Transparent Response to Questions about LCFS Cost (final).pdf

Date and Time Comment Was Submitted: 2024-11-08 08:43:32

No Duplicates.

## **Comment 16 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Kurtis

Last Name: Downs

Email Address: kvdownsrc@gmail.com

Affiliation:

Subject: Gas Prices and lowcarbon fuel standards

Comment:

The Inland Valley Daily Bulletin had a article Gov. Newsoms gas hikes hit hardworking Californians this week. We do not need a gas hit a again with more taxes on gas. Also the lost of the Philips Refinery next years is going to put more pressure for higher gas prices. The Governor needs to start care the working people and not his agenda.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 08:39:42

No Duplicates.



**Comment 17 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: James

Last Name: Duffy

Email Address: duffje@msn.com

Affiliation: Former LCFS Branch Chief

Subject: The AAM is Poorly Written and Poorly Designed

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8109-lcfs2024-BmdcOwZqUV0FagR3.pdf](http://www.arb.ca.gov/lists/com-attach/8109-lcfs2024-BmdcOwZqUV0FagR3.pdf)

Original File Name: AAM is poorly written and poorly designed.pdf

Date and Time Comment Was Submitted: 2024-11-08 08:49:22

No Duplicates.

**Comment 18 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Frank

Last Name: Harris

Email Address: fharris@cmua.org

Affiliation: CMUA

Subject: Comments on LCFS2024

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8110-lcfs2024-UzBQOwRwAzECW1c7.pdf](http://www.arb.ca.gov/lists/com-attach/8110-lcfs2024-UzBQOwRwAzECW1c7.pdf)

Original File Name: CMUA LCFS Comments 11.8.2024.pdf

Date and Time Comment Was Submitted: 2024-11-08 08:59:47

No Duplicates.

## **Comment 19 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Daniel

Last Name: Gaston

Email Address: Danielrgaston@gmail.com

Affiliation:

Subject: LCFS2024

Comment:

I feel that the standards that CARB are putting into place are limiting consumers options for purchase of car and limiting jobs. My Gardener will now be unable to keep his company going due to your limits placed on carbon emissions. We can not purchase low carbon emission DEF diesel engine vehicle, like the rest of the world can. Imagine using a low carbon engine diesel engine with state of the art now fuel injectors running a generator charging fuel cells to run a vehicle. LA traffic is the worst thing of Carbon emissions. Diesel run at a lower RPM and can put out super low Carbon with next gen fuel injectors. Rather taking opportunities away and need to use these funds for R&D on making Diesel the fuel of the future.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 08:56:02

No Duplicates.

**Comment 20 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Capri

Last Name: Maybrun

Email Address: hcmaudio@yahoo.com

Affiliation:

Subject: Stop New Low Carbon Fuel Standard

Comment:

STOP New Low Carbon Fuel Standard!  
Lower our gas prices

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 09:08:10

No Duplicates.

## **Comment 21 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Ryan

Last Name: Hinds

Email Address: ryan.r.hinds@gmail.com

Affiliation:

Subject: Please Consider Other Alternatives For A Low Carbon Future

Comment:

California's gas prices have long been the highest in the country. Instead of passing new low carbon fuel standards (LCFS) that could increase them even more, for which no cost estimate has been given, let's look at other ways to reduce our carbon footprint.

Speed up construction of transit projects around the state which can take cars off the road. Even EVs have a carbon footprint during manufacturing and do not alleviate our traffic problems.

Electrify Metrolink and SMART to allow for more frequent service, especially during weekends where traffic can be as bad as during the weekdays in the LA/SD Metros. Stop funding highway expansion projects, even those with toll lanes like I-405 in Orange County and US 101 in the Bay Area.

Work with farmers to implement regenerative agriculture which can provide a negative carbon footprint.

Replace aging natural gas powerplants with new nuclear ones and restructure incentives to allow for more people to afford solar (either on their own homes or via community programs).

Just passing new LCFS without a cost estimate is just punishing the poorest Californians that cannot afford EVs, let alone have a place to charge them if they rent. EVs may be part of the solution, but way better would be to have a society like Japan where people can live without a car to get to most places.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 09:10:06

No Duplicates.

**Comment 22 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Harry

Last Name: Maybrun

Email Address: hcmaudio1@yahoo.com

Affiliation:

Subject: Lower our gas prices

Comment:

Stop this Low Carbon Fuel nonsense.  
Lower our gas prices

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 09:10:22

No Duplicates.

**Comment 23 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Jeremy

Last Name: Martin

Email Address: [jmartin@ucsusa.org](mailto:jmartin@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: UCS Comments on LCFS Amendments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8116-lcfs2024-AHVdOAFzBAGFbwVm.pdf](http://www.arb.ca.gov/lists/com-attach/8116-lcfs2024-AHVdOAFzBAGFbwVm.pdf)

Original File Name: UCS LCFS Verbal Testimony Nov 2024.pdf

Date and Time Comment Was Submitted: 2024-11-08 09:12:15

No Duplicates.

## **Comment 24 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Dan

Last Name: Kramer

Email Address: kramersaccount@gmail.com

Affiliation:

Subject: Oppose Gasoline Price Increases

Comment:

Gas prices at the pump are already the highest in the nation, costing \$1.47 more per gallon than the national average due to California's high gas tax and the required special gasoline blend. And with the Governors latest proposals on California's refining industry prices are likely to go even higher

CARBs proposal will further increase gas prices by 50 cents per gallon or more. CARB's own projection last year estimated that their low carbon fuel standard (LCFS) would increase prices by 47 cents per gallon, yet CARB is unwilling to confirm or update this estimate and is moving forward regardless. This increase would be devastating for those struggling to get by with current prices and inflation on everything from food to electricity. Everyone in California with the exception of the very wealthy are already struggling with California's gas prices and sustained inflation may reconsider their future in the state if gas prices rise even further. Even those who don't drive would feel the impact through increased supply chain costs and potential disruptions further driving up costs on groceries and everything else that includes a transportation component. I urge CARB to consider the serious impact this proposal would have on those who have work for a living and are barely making ends meet. Thank you for your time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 09:03:47

No Duplicates.



**Comment 25 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Jeremy

Last Name: Martin

Email Address: [jmartin@ucsusa.org](mailto:jmartin@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: Resubmission of October 15 Day Change comments

Comment:

These were submitted during the October 15 day change rulemaking,  
but do not appear from the website to be on the record, so I am  
resubmitting them now.

Attachment: [www.arb.ca.gov/lists/com-attach/8118-lcfs2024-UCVdOABYVVkKYwZl.pdf](http://www.arb.ca.gov/lists/com-attach/8118-lcfs2024-UCVdOABYVVkKYwZl.pdf)

Original File Name: UCS Oct 15 day comments.pdf

Date and Time Comment Was Submitted: 2024-11-08 09:20:05

No Duplicates.

## **Comment 26 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Erica  
Last Name: Smith  
Email Address: erica@syaslparkers.com  
Affiliation: SYASL Parkers

Subject: Proposed Amendments to the Low Carbon Fuel Standard Regulation - OPPOSE  
Comment:

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Proposed Amendments to the Low Carbon Fuel Standard Regulation  
- OPPOSE

Dear Chair Randolph and CARB Board Members,  
I am writing on behalf of the Kern County Board of Supervisors to express our serious concerns with the proposed "Second 15-Day Changes" to the Low Carbon Fuel Standard (LCFS) regulations. Specifically, we are perplexed by the seemingly arbitrary requirements to limit LCFS crediting to hydrogen that is at least 80% renewable starting in 2030 and the prohibition of blue hydrogen from generating credits beginning in 2035. The proposed changes outlined in Section 95482(h) will add unnecessary complexity and limit cost-effective decarbonization options for the state. Furthermore, the changes are likely to create market uncertainty for hydrogen suppliers and discourage investment in future projects that are critical to Kern's economic development strategy. Kern has been integral in helping the state achieve its current levels of renewable energy generation. We have sited and permitted over 21,000 MW of renewable wind and solar and over 17,000 MWh of lithium battery storage. The County has also invested in Department of Energy LEAP grants in an effort to diversify our economy and advance the state's ambitious climate goals. Last week, our Board approved California's first ever carbon capture and storage (CCS) project which included a final environmental impact report containing hundreds of conditions and mitigation measures to ensure the safety of our community. These projects highlight Kern's strategic initiative and forward thinking aimed at attracting clean energy industries to our county, including hydrogen. The proposed change to prohibit credits for blue hydrogen by 2035 completely ignores the time it takes to construct projects in California due to CEQA. As it stands today, this type of project would not be operational until 2027 at the earliest, leaving only eight years for a project to make use of the credits. Such a short timeframe essentially makes these types of

projects uneconomical. Current projections suggest that hydrogen fuel for heavy trucks is not expected to achieve 80-100% of market share until at least 2050, with no assurances that even those target goals can be achieved. Green hydrogen is operationally unproven and requires accessory solar installations that make siting these projects a challenge.

In addition, limitations on electricity connections and the use of solar owned by large-scale commercial producers need to be addressed by the California Energy Commission, California Independent System Operator, and California Public Utilities Commission to make green hydrogen a viable option. These regulatory agencies must engage in rulemaking on these critical issues if green hydrogen is to play a role in the state's energy transition plan. A more appropriate approach to the hydrogen dilemma would be to scale up the period for blue hydrogen crediting to at least 2045 to better align with the state's renewable energy production goals.

With review under CEQA and full mitigation of criteria pollutants down to "no net increase" through capture and permanent storage of CO<sub>2</sub>, these projects could make tangible impacts right now while the issues hampering green hydrogen are ironed out. The 2035 sunset is a departure from a technology-neutral, market-based approach and sends a clear message to investors that California's regulatory agencies may arbitrarily change rules and negatively impact the investment landscape.

Investors need certainty. This change will inevitably and unnecessarily strand existing assets and deter future investments. The LCFS should continue to preserve consumer choice by providing a level playing field for all technologies, embracing fuel- and technology-neutral principles that focus on the meaningful and timely reduction of greenhouse gas emissions.

Here at home, Kern is doing its part to keep the lights on for Californians and find solutions that will help the state achieve its long-term climate goals. The impending loss of close to \$80 million per year that the local oil and gas industry contributes directly and indirectly to our bottom line cannot be ignored. These revenues provide essential services and contribute to the overall quality of life our residents expect and deserve. We're looking for common sense policies from our state government and regulatory agencies that promote economic diversification and prosperity, not prevent it before it even begins. Your Board has an opportunity to make sure that happens.

For these reasons, the Kern County Board of Supervisors respectfully opposes the proposed changes outlined in Section 95482(h) and asks CARB to delay this vote to allow your staff, interested stakeholders, and the public more time to analyze the long-term economic impacts these policies will have on California. There simply needs to be more time and opportunity to properly vet these critical issues.

Sincerely,

David Couch, Chairman  
Kern County Board of Supervisors  
cc: The Honorable Gavin Newsom, Governor of California  
Honorable Members, Kern legislative delegation  
California State Association of Counties  
Kern County Planning and Natural Resources Department  
Shaw Yoder Antwih Schmelzer & Lange

Attachment: [www.arb.ca.gov/lists/com-attach/8119-lcfs2024-Uz9RMIw6BzNXNFI8.pdf](http://www.arb.ca.gov/lists/com-attach/8119-lcfs2024-Uz9RMIw6BzNXNFI8.pdf)

Original File Name: LEGGEN Proposed Amendments to LCFS Regulation (CARB) - OPPOSE signed.pdf

Date and Time Comment Was Submitted: 2024-11-08 09:21:49

No Duplicates.

## **Comment 27 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Kern

Last Name: County

Email Address: erica@syaslparkers.com

Affiliation: Kern County

Subject: Proposed Amendments to the Low Carbon Fuel Standard Regulation - OPPOSE  
Comment:

Dear Chair Randolph and CARB Board Members,  
I am writing on behalf of the Kern County Board of Supervisors to express our serious concerns with the proposed "Second 15-Day Changes" to the Low Carbon Fuel Standard (LCFS) regulations. Specifically, we are perplexed by the seemingly arbitrary requirements to limit LCFS crediting to hydrogen that is at least 80% renewable starting in 2030 and the prohibition of blue hydrogen from generating credits beginning in 2035. The proposed changes outlined in Section 95482(h) will add unnecessary complexity and limit cost-effective decarbonization options for the state. Furthermore, the changes are likely to create market uncertainty for hydrogen suppliers and discourage investment in future projects that are critical to Kern's economic development strategy. Kern has been integral in helping the state achieve its current levels of renewable energy generation. We have sited and permitted over 21,000 MW of renewable wind and solar and over 17,000 MWh of lithium battery storage. The County has also invested in Department of Energy LEAP grants in an effort to diversify our economy and advance the state's ambitious climate goals. Last week, our Board approved California's first ever carbon capture and storage (CCS) project which included a final environmental impact report containing hundreds of conditions and mitigation measures to ensure the safety of our community. These projects highlight Kern's strategic initiative and forward thinking aimed at attracting clean energy industries to our county, including hydrogen. The proposed change to prohibit credits for blue hydrogen by 2035 completely ignores the time it takes to construct projects in California due to CEQA. As it stands today, this type of project would not be operational until 2027 at the earliest, leaving only eight years for a project to make use of the credits. Such a short timeframe essentially makes these types of projects uneconomical. Current projections suggest that hydrogen fuel for heavy trucks is not expected to achieve 80-100% of market share until at least 2050, with no assurances that even those target goals can be achieved. Green

hydrogen is operationally unproven and requires accessory solar installations that make siting these projects a challenge. In addition, limitations on electricity connections and the use of solar owned by large-scale commercial producers need to be addressed by the California Energy Commission, California Independent System Operator, and California Public Utilities Commission to make green hydrogen a viable option. These regulatory agencies must engage in rulemaking on these critical issues if green hydrogen is to play a role in the state's energy transition plan. A more appropriate approach to the hydrogen dilemma would be to scale up the period for blue hydrogen crediting to at least 2045 to better align with the state's renewable energy production goals. With review under CEQA and full mitigation of criteria pollutants down to "no net increase" through capture and permanent storage of CO2, these projects could make tangible impacts right now while the issues hampering green hydrogen are ironed out. The 2035 sunset is a departure from a technology-neutral, market-based approach and sends a clear message to investors that California's regulatory agencies may arbitrarily change rules and negatively impact the investment landscape. Investors need certainty. This change will inevitably and unnecessarily strand existing assets and deter future investments. The LCFS should continue to preserve consumer choice by providing a level playing field for all technologies, embracing fuel- and technology-neutral principles that focus on the meaningful and timely reduction of greenhouse gas emissions. Here at home, Kern is doing its part to keep the lights on for Californians and find solutions that will help the state achieve its long-term climate goals. The impending loss of close to \$80 million per year that the local oil and gas industry contributes directly and indirectly to our bottom line cannot be ignored. These revenues provide essential services and contribute to the overall quality of life our residents expect and deserve. We're looking for common sense policies from our state government and regulatory agencies that promote economic diversification and prosperity, not prevent it before it even begins. Your Board has an opportunity to make sure that happens.

For these reasons, the Kern County Board of Supervisors respectfully opposes the proposed changes outlined in Section 95482(h) and asks CARB to delay this vote to allow your sta#1049007;, interested stakeholders, and the public more time to analyze the long-term economic impacts these policies will have on California. There simply needs to be more time and opportunity to properly vet these critical issues.

Sincerely,

David Couch, Chairman

Kern County Board of Supervisors

cc: The Honorable Gavin Newsom, Governor of California

Honorable Members, Kern legislative delegation

California State Association of Counties

Kern County Planning and Natural Resources Department  
Shaw Yoder Antwih Schmelzer & Lange

Attachment: [www.arb.ca.gov/lists/com-attach/8120-lcfs2024-WzdXNFE3AjYCYVA+.pdf](http://www.arb.ca.gov/lists/com-attach/8120-lcfs2024-WzdXNFE3AjYCYVA+.pdf)

Original File Name: LEGGEN Proposed Amendments to LCFS Regulation (CARB) - OPPOSE signed.pdf

Date and Time Comment Was Submitted: 2024-11-08 09:28:17

No Duplicates.

**Comment 28 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Lauren

Last Name: Gallagher

Email Address: lgallagher@cbeval.org

Affiliation: Communities for a Better Environment

Subject: CBE Comments and Materials Relevant to Board's Consideration of LCFS  
Comment:

Please see the attached document for a link to download a file containing comments and attachments relevant to the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/8121-lcfs2024-UzFSO1QtU14BawJr.pdf](http://www.arb.ca.gov/lists/com-attach/8121-lcfs2024-UzFSO1QtU14BawJr.pdf)

Original File Name: Box Link Letter 11.8.24.pdf

Date and Time Comment Was Submitted: 2024-11-08 09:29:07

No Duplicates.



## **Comment 29 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Kern County  
Last Name: Kern County  
Email Address: erica@syaslparkers.com  
Affiliation: Kern County

Subject: Proposed Amendments to the Low Carbon Fuel Standard Regulation - OPPOSE  
Comment:

Dear Chair Randolph and CARB Board Members,  
I am writing on behalf of the Kern County Board of Supervisors to express our serious concerns with the proposed "Second 15-Day Changes" to the Low Carbon Fuel Standard (LCFS) regulations. Specifically, we are perplexed by the seemingly arbitrary requirements to limit LCFS crediting to hydrogen that is at least 80% renewable starting in 2030 and the prohibition of blue hydrogen from generating credits beginning in 2035. The proposed changes outlined in Section 95482(h) will add unnecessary complexity and limit cost-effective decarbonization options for the state. Furthermore, the changes are likely to create market uncertainty for hydrogen suppliers and discourage investment in future projects that are critical to Kern's economic development strategy. Kern has been integral in helping the state achieve its current levels of renewable energy generation. We have sited and permitted over 21,000 MW of renewable wind and solar and over 17,000 MWh of lithium battery storage. The County has also invested in Department of Energy LEAP grants in an effort to diversify our economy and advance the state's ambitious climate goals. Last week, our Board approved California's first ever carbon capture and storage (CCS) project which included a final environmental impact report containing hundreds of conditions and mitigation measures to ensure the safety of our community. These projects highlight Kern's strategic initiative and forward thinking aimed at attracting clean energy industries to our county, including hydrogen. The proposed change to prohibit credits for blue hydrogen by 2035 completely ignores the time it takes to construct projects in California due to CEQA. As it stands today, this type of project would not be operational until 2027 at the earliest, leaving only eight years for a project to make use of the credits. Such a short timeframe essentially makes these types of projects uneconomical. Current projections suggest that hydrogen fuel for heavy trucks is not expected to achieve 80-100% of market share until at least 2050, with no assurances that even those target goals can be achieved. Green

hydrogen is operationally unproven and requires accessory solar installations that make siting these projects a challenge. In addition, limitations on electricity connections and the use of solar owned by large-scale commercial producers need to be addressed by the California Energy Commission, California Independent System Operator, and California Public Utilities Commission to make green hydrogen a viable option. These regulatory agencies must engage in rulemaking on these critical issues if green hydrogen is to play a role in the state's energy transition plan. A more appropriate approach to the hydrogen dilemma would be to scale up the period for blue hydrogen crediting to at least 2045 to better align with the state's renewable energy production goals. With review under CEQA and full mitigation of criteria pollutants down to "no net increase" through capture and permanent storage of CO2, these projects could make tangible impacts right now while the issues hampering green hydrogen are ironed out. The 2035 sunset is a departure from a technology-neutral, market-based approach and sends a clear message to investors that California's regulatory agencies may arbitrarily change rules and negatively impact the investment landscape. Investors need certainty. This change will inevitably and unnecessarily strand existing assets and deter future investments. The LCFS should continue to preserve consumer choice by providing a level playing field for all technologies, embracing fuel- and technology-neutral principles that focus on the meaningful and timely reduction of greenhouse gas emissions. Here at home, Kern is doing its part to keep the lights on for Californians and find solutions that will help the state achieve its long-term climate goals. The impending loss of close to \$80 million per year that the local oil and gas industry contributes directly and indirectly to our bottom line cannot be ignored. These revenues provide essential services and contribute to the overall quality of life our residents expect and deserve. We're looking for common sense policies from our state government and regulatory agencies that promote economic diversification and prosperity, not prevent it before it even begins. Your Board has an opportunity to make sure that happens.

For these reasons, the Kern County Board of Supervisors respectfully opposes the proposed changes outlined in Section 95482(h) and asks CARB to delay this vote to allow your stakeholders, and the public more time to analyze the long-term economic impacts these policies will have on California. There simply needs to be more time and opportunity to properly vet these critical issues.

Sincerely,

David Couch, Chairman

Kern County Board of Supervisors

cc: The Honorable Gavin Newsom, Governor of California

Honorable Members, Kern legislative delegation

California State Association of Counties

Kern County Planning and Natural Resources Department  
Shaw Yoder Antwih Schmelzer & Lange

Attachment: [www.arb.ca.gov/lists/com-attach/8122-lcfs2024-BWlcP1QyV2NVNIU7.pdf](http://www.arb.ca.gov/lists/com-attach/8122-lcfs2024-BWlcP1QyV2NVNIU7.pdf)

Original File Name: LEGGEN Proposed Amendments to LCFS Regulation (CARB) - OPPOSE signed.pdf

Date and Time Comment Was Submitted: 2024-11-08 09:28:17

No Duplicates.

## **Comment 30 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Lauren

Last Name: Gallagher

Email Address: lgallagher@cbeal.org

Affiliation: Communities for a Better Environment

Subject: FixLCFS Coalition Letter Calling for a No Vote on the LCFS

Comment:

Please see the attached letter from a coalition of community based, environmental, and environmental justice organizations calling on the Board vote no on the LCFS and make changes in line with environmental justice recommendations.

Attachment: [www.arb.ca.gov/lists/com-attach/8123-lcfs2024-WjxQP1EoAD8GY1A2.pdf](http://www.arb.ca.gov/lists/com-attach/8123-lcfs2024-WjxQP1EoAD8GY1A2.pdf)

Original File Name: FixLCFS Coalition - Second 15 Day Changes Coalition Comment Letter Nov 2024.pdf

Date and Time Comment Was Submitted: 2024-11-08 09:36:23

No Duplicates.

## **Comment 31 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Daniel

Last Name: Gage

Email Address: [dgage@transportproject.org](mailto:dgage@transportproject.org)

Affiliation: The Transport Project, President

Subject: Approve LCFS program modifications

Comment:

I comment representing The Transport Project, a national collective of fleets, vehicle and engine manufacturers, servicers and suppliers, and fuel producers and providers dedicated to the decarbonization of North America's transportation sector.

Through the increased use of gaseous motor fuels including renewable natural gas and hydrogen, we can achieve ambitious climate goals and greatly improve air quality safely, reliably, and effectively without delay and without compromising existing commercial business operations.

Our roughly 200 member companies and fleets support the proposed modifications before you and encourage their adoption. They are not perfect, nor ideal for all, including our members, but they represent a rational, comprehensive, and consistent approach to strengthening the LCFS program and continuing its emissions reduction success.

Moving forward, it is important that CARB advance an LCFS that:

- Focuses on vehicles and fuels used;
- Centers on their well-to-wheel emissions, providing a level playing field for all; and
- Creates investment certainty by continuing to reward agriculturally based reductions including those achieved by the production of biofuels, especially RNG and Hydrogen produced from RNG.

Thank you for considering our position.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 09:39:30

No Duplicates.

## **Comment 32 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: George  
Last Name: Halgedahl  
Email Address: gdahl@gmail.com  
Affiliation: CA Resident

Subject: Cancel the proposed +50¢ to 70¢ cost per gallon “Low carbon Fuel Standard”  
Comment:

Cancel the proposed +50¢ to 70¢ cost per gallon "Low carbon Fuel Standard"

I'm a California resident and I am asking the California Air Resources Board CANCEL the proposed "Low carbon Fuel Standard", another scheme to injure those of us who remain in California. Another 50¢ to 70¢ cost per gallon on TOP of the absurd fuel taxes we pay already? NO. Cancel this proposed "Low carbon Fuel Standard". Thank you CARB, have a good day!

George Halgedahl  
San Diego

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 09:39:55

No Duplicates.

**Comment 33 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Dean

Last Name: Taylor

Email Address: Dean@CalETC.com

Affiliation: Calif Electric Transportation Coaliton

Subject: CalETC summary past holdback spending by utilities

Comment:

See attached 6 page overview of Utility LCFS Holdback Spending with summaries from SDG&E, SCE, SMUD, LADWP, PG&E and small Utility members of NCPA

Attachment: [www.arb.ca.gov/lists/com-attach/8126-lcfs2024-VzgCcgBkVHUFdQFo.pdf](http://www.arb.ca.gov/lists/com-attach/8126-lcfs2024-VzgCcgBkVHUFdQFo.pdf)

Original File Name: Overview of Utility LCFS Holdback spending.pdf

Date and Time Comment Was Submitted: 2024-11-08 09:46:59

No Duplicates.

**Comment 34 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: ether

Last Name: portilla

Email Address: eportillo@nrdc.org

Affiliation: NRDC

Subject: NRDC comment

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8128-lcfs2024-AWQAdVUGWWIBYIUn.pdf](http://www.arb.ca.gov/lists/com-attach/8128-lcfs2024-AWQAdVUGWWIBYIUn.pdf)

Original File Name: Esther Portillo (2).pdf

Date and Time Comment Was Submitted: 2024-11-08 09:49:52

No Duplicates.



**Comment 35 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Robert  
Last Name: Spiegel  
Email Address: rspiegel@cmta.net  
Affiliation: CMTA

Subject: CMTA Comments - LCFS Third-Party Validation Concerns  
Comment:

The California Manufacturers & Technology Association (CMTA)  
appreciates the opportunity to comment on the amendments to LCFS.  
Our comments are provided as an attachment.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/8129-lcfs2024-VDdSOVUgUWMFXAkk.pdf](http://www.arb.ca.gov/lists/com-attach/8129-lcfs2024-VDdSOVUgUWMFXAkk.pdf)

Original File Name: CMTA - LCFS Comments on Third-Party Issues (11.07.24).pdf

Date and Time Comment Was Submitted: 2024-11-08 09:59:05

No Duplicates.

## **Comment 36 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Tyler

Last Name: Lobdell

Email Address: tlobdell@fwwatch.org

Affiliation: Food & Water Watch

Subject: Vote No if factory farm biomethane policies are not corrected

Comment:

To quote the vice president for operations at Dynamic Renewables, a Wisconsin-based company that operates digesters in the Midwest where the LCFS is driving factory farm expansion, "More cows and more manure means more energy." (Erin Jordan, 'More Manure Means More Energy': Iowa Dairies with Biogas Digesters Are Growing Their Herds, which Concerns Water Quality Advocates, Gazette (Nov. 3, 2024), <https://www.thegazette.com/agriculture/more-manure-means-more-energy-iowa-dairies-with-biogas-digesters-are-growing-their-herds-which-c/>). The evidence is unavoidable that CARB's decision to allow factory farms to see large profits from the LCFS under the avoided methane crediting policy is counterproductive and the definition of unjust climate policy. As much as staff wish to ignore this, they cannot overcome reality.

And the proposal today attempts to lay waste to CARB's statutory obligations under SB 1383. As staff's presentation reiterated this morning, the LCFS works to "decarbonize our transportation sector." Not the dairy sector. By pushing methane mitigation in agriculture into the LCFS as your means of meeting 1383, you ignore the obvious and staff's own admissions about how capture in one sector used to meet legal obligations in another works.

Finally, the resolution offers a timeline for 1383 regulations that is, on its face, at odds with the statutory text. The resolution calls for staff to implement regulations "starting in 2030." SB 1383 obligates CARB to meet the 40% reduction "by 2030." You cite the statute in the resolution, but direct staff to openly flout the timeline the legislature required. The fix is clear and required by law: CARB must now prioritize 1383 regulations to reduce manure methane emissions and stop using the LCFS and avoided methane crediting to reward factory farms for polluting the climate and communities across the country.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 10:10:18

No Duplicates.



**Comment 37 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: John

Last Name: Jones

Email Address: john.jones@fidelisinfra.com

Affiliation: Fidelis New Energy, LLC

Subject: Fidelis New Energy, LLC Comments on the Proposed LCFS Amendments

Comment:

We appreciate the opportunity to provide the attached comments on the California LCFS and the proposed amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/8131-lcfs2024-BmBRPIM2ADYHbQJr.pdf](http://www.arb.ca.gov/lists/com-attach/8131-lcfs2024-BmBRPIM2ADYHbQJr.pdf)

Original File Name: Fidelis New Energy LLC Comments on Proposed LCFS Regulations\_11 08 2024.pdf

Date and Time Comment Was Submitted: 2024-11-08 10:27:32

No Duplicates.

**Comment 38 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Nina

Last Name: Robertson

Email Address: nrobertson@earthjustice.org

Affiliation: Earthjustice

Subject: Earthjustice's Comments on EIA For LCFS Proposed Amendments

Comment:

Please see enclosed Earthjustice's Comments on the Environmental Impact Analysis for Proposed Regulatory Amendments to the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/8132-lcfs2024-AjAFM1xvVjFVfgQ1.pdf](http://www.arb.ca.gov/lists/com-attach/8132-lcfs2024-AjAFM1xvVjFVfgQ1.pdf)

Original File Name: 2024-1108 Earthjustice Comments on EIA for LCFS Proposed Amendments.pdf

Date and Time Comment Was Submitted: 2024-11-08 10:30:56

No Duplicates.

## **Comment 39 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Douglas  
Last Name: McLendon  
Email Address: thefixer@att.net  
Affiliation:

Subject: Low Carbon Fuel Standard Amendments  
Comment:

To: CARB Board Members,

I am writing to you to urge you not to endorse the restrictions on the "carbon intensity of fuels" proposal that is currently before you. This will cause the price of gas to increase at the pump. The citizens of California already have one of the highest gas prices in the nation. A increase in fuel prices will cause a spike in inflation throughout the state since everything that is transported to stores or for manufacturing is affected by gas prices. This spike in inflation will remain forever and not subside. I know you feel that CARB does not set fuel prices, but any cost increase to the gas companies will be passed on to the consumers.

Let's let technology by the auto manufacturers like autos with better fuel economy, lower emissions and gas/electric hybrids achieve the results you desire.

Don't try to force us to drive less by adopting a policy that spikes gas prices.  
The people of California will become very angry if that is the end result of this policy.

Douglas McLendon  
Chico, CA 95973  
530-894-4026

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 10:32:18

No Duplicates.

## **Comment 40 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Daniel

Last Name: Lashof

Email Address: dan.lashof@wri.org

Affiliation: World Resources Institute

Subject: Cap and Phase Out Crop-Based Fuel

Comment:

I'm Dan Lashof, US Director of the World Resources Institute. I have been a strong supporter of the LCFS program for many years, but today I'm profoundly conflicted. Chair Randolph made a compelling case for the LCFS in her opening comments. At the same time, I'm alarmed by the rapid increase in the use of crop-based Renewable Diesel in the last several years.

The record for this rulemaking is chock full of detailed comments showing that crop-based biofuels are worse for the climate than petroleum fuels when the opportunity cost of using prime farmland for fuel production is accounted for. These comments include a devastating critique of the GTAP model currently used by CARB to calculate indirect land-use change emissions, written by the Chair of the Yale economics department.

The debate on ILUC can seem esoteric, but it comes down to a very simple question: Does it make any sense to turn food crops into fuel? The answer to this question is clearly NO, given the impact of dedicating millions of acres of prime farmland to fuel production on food prices and global deforestation.

The proposed rule nominally includes a 20% credit limit on some virgin vegetable oils. This is a step in the right direction, but its impact is questionable at best given that current producers are grandfathered and that RD volumes above the cap are still credited at the CI of the emissions target, rather than the CI of fossil diesel.

The proposed resolution also calls for a workshop on ILUC modeling. Given all the workshops CARB has already hosted and the detailed comments in the record, this frankly looks like a box-checking exercise.

I urge the Board to adopt a resolution that specifically calls on staff to replace its current approach to calculating ILUC with one that is empirically grounded and scientifically sound. I also urge the Board to call for an effective cap on crop-based fuels followed by a phase out by 2030.

As noted in the staff presentation, what CARB does has enormous influence on other states and countries. Please send a clear message that turning food into fuel is not an effective or acceptable climate policy.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 10:51:43

No Duplicates.



**Comment 41 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Devon

Last Name: Ryan

Email Address: ryand@caltrain.com

Affiliation: Caltrain

Subject: Caltrain Letter Regarding LCFS Program

Comment:

Please see attached letter from the Peninsula Corridor Joint Powers  
Board (Caltrain) regarding the LCFS Program.

Attachment: [www.arb.ca.gov/lists/com-attach/8135-lcfs2024-UDNVMI9V3ABdQJj.pdf](http://www.arb.ca.gov/lists/com-attach/8135-lcfs2024-UDNVMI9V3ABdQJj.pdf)

Original File Name: Caltrain Letter Regarding LCFS Program.pdf

Date and Time Comment Was Submitted: 2024-11-08 10:53:33

No Duplicates.

## **Comment 42 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: James

Last Name: Senter

Email Address: jayboo33@gmail.com

Affiliation:

Subject: Please Adopt Proposed Changes to the LCFS

Comment:

As an early adopter of a fuel cell electric vehicle (I've leased 3 Mirai in the last 8 years), I am anxious that we fix California's Low-Carbon Fuel Standard (LCFS). The LCFS has been one of the strongest carbon markets in the world, driving significant private investment in achieving the carbon intensity (CI) reductions in transportation fuels and leading the way for more than a half dozen other states who are developing similar programs.

When I leased my first fuel-cell vehicle in 2016, hydrogen prices were in the \$10-\$12/kg range. Station developers were building stations without public grant funding. However, post-pandemic the LCFS market has ceased to support fuel cell electric vehicles and hydrogen station development. Fuel-cell drivers are now facing hydrogen prices in the \$36/kg range, and many once-reliable stations are closing due to lack of support from the LCFS.

We must immediately fix the LCFS to drive investment to hydrogen refueling stations which are necessary to achieve California's 2045 carbon neutrality goal. The expansion of infrastructure credits for zero-emission vehicle charging and hydrogen refueling are critically important to achieve California's zero emission vehicle regulations and executive orders.

I urge you to support the adoption of the proposed changes to the LCFS TODAY!

Respectfully,

Jim Senter

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 10:55:25

No Duplicates.

## **Comment 43 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: KEVIN

Last Name: YOUNG

Email Address: kevinpyoung@gmail.com

Affiliation:

Subject: LCFS Amendments

Comment:

How does CA propose to limit other pollution from violating its airspace? No matter what you propose within the state the influences of the surrounding airspace will effect the data presented here and no comments on that subject are presented. Our infrastructure cant support current EV demands. Funding of these amendments while assured taxpayers will not see it in the gas pump, but CA notoriously has pushed the taxpayers on behalf of "good intentions and the environment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 11:01:29

No Duplicates.

## **Comment 44 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Bob

Last Name: Chan

Email Address: Bobchansd@gmail.com

Affiliation:

Subject: Need to adopt Hydrogen

Comment:

Chair and Members of the California Air Resources Board,

As an early adopter of a fuel cell electric vehicle, it is imperative to fix California's Low-Carbon Fuel Standard (LCFS). The LCFS has been one of the strongest carbon markets in the world, driving significant private investment in achieving the carbon intensity (CI) reductions in transportation fuels and leading the way for more than a half dozen other states who are developing similar programs.

The strength of this market signal was working and lowered hydrogen prices to the \$10-\$12/kg range. Station developers were building stations without public grant funding. However, post-pandemic the LCFS market has ceased to support fuel cell electric vehicles and hydrogen station development.

We must immediately fix the LCFS to drive investment to hydrogen refueling stations which are necessary to achieve California's 2045 carbon neutrality goal. The expansion of infrastructure credits for zero-emission vehicle charging and hydrogen refueling are critically important to achieve California's zero emission vehicle regulations and executive orders.

I urge you to support the adoption of the proposed changes to the LCFS TODAY!

Respectfully,

Bob Chan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 11:11:40

No Duplicates.

## **Comment 45 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Felipe

Last Name: Amaya

Email Address: felipe.amaya@modernhydrogen.com

Affiliation:

Subject: Why Excluding H2 Produced from Fossil Fuels Undermines California's Environmental Goals

Comment:

To effectively combat climate change, our focus must be on reducing carbon emissions, not on eliminating hydrocarbons. Modern technologies like methane pyrolysis allow us to separate carbon from hydrocarbons, enabling the production of clean hydrogen while utilizing existing infrastructure and minimizing costs. This approach yields hydrogen as clean, if not cleaner, than so-called "green hydrogen," without relying on renewable power.

Categorically excluding fossil fuels from hydrogen production under the LCFS undermines California's environmental goals by ignoring a critical, low-carbon, and scalable solution. Here's why:

1. Fossil fuel-based hydrogen can achieve carbon neutrality or negativity: methane pyrolysis can produce hydrogen with minimal or even negative carbon footprints, offering a competitive and immediate pathway to emission reduction.
2. Urgent decarbonization: delaying the adoption of all viable low-carbon technologies will harm vulnerable communities disproportionately affected by pollution and climate change. We need immediate, practical solutions to meet our environmental targets.
3. Infrastructure reliability: using existing natural gas pipelines for hydrogen distribution ensures reliable supply and enhances fuel cell vehicle adoption. Limiting fossil fuel-derived hydrogen would hinder the transition to clean transportation.
4. Cost competitiveness: a diverse hydrogen market lowers costs and price to end users. Excluding fossil fuel-derived hydrogen stifles innovation, limiting affordable decarbonization options.
5. Water conservation: unlike electrolyzers, hydrogen production from methane pyrolysis requires no water, a crucial advantage in drought-prone areas of California.

We can and should leverage fossil fuels to produce clean hydrogen. Excluding this pathway further delays critical progress in achieving California's urgent climate goals.

Attachment:

Original File Name:

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

No Duplicates.

## **Comment 46 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: oscar

Last Name: garcia

Email Address: oscarhgarcia@gmail.com

Affiliation:

Subject: fix the hydrogen infrasyructure fiasco!

Comment:

Please lower the price of hydrogen because it has tripled in the last few years and the number of working stations has shriveled up. I waste time and mileage finding available stations and the situation has caused me to park my hydrogen car because I can't travel to provide my job function in covering southern California.

I was duped by Toyota into buying through lies and deception and I am now stuck paying for a car that is unusable! Please help me!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 11:05:42

No Duplicates.

## **Comment 47 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Jim

Last Name: Stewart

Email Address: drjimstewart@gmail.com

Affiliation:

Subject: Don't kill more people with air pollution Vote NO on LCFS amendments

Comment:

As you have heard today, millions of people throughout CA are dying or being injured by asthma and other respiratory diseases, caused in part by burning biodiesel and biomethane in trucks that should be electrified.

Save lives! Listen to Senator Flores! Vote No!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 11:19:15

No Duplicates.



## **Comment 48 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Igor

Last Name: Tregub

Email Address: itregub@gmail.com

Affiliation:

Subject: Vote NO!

Comment:

As you have heard today, millions of people throughout CA are dying or being injured by asthma and other respiratory diseases, caused in part by burning biodiesel and biomethane in trucks that should be electrified.

Save lives! Listen to Senator Flores! Vote No!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 11:54:43

No Duplicates.

## **Comment 49 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Mary

Last Name: Elizabeth

Email Address: mebeth@outlook.com

Affiliation:

Subject: LCFS Comments

Comment:

Greetings,

I submitted comments previously and want to say again for the record that giving low carbon fuel credits for hydrogen made from fossil methane natural gas should end immediately. Additionally, credits for use of fuels for renewable diesel should not be granted for overseas sources unless the communities impacted by the marine transportation at Ports are not already overburdened with pollutants.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 12:00:18

No Duplicates.

## **Comment 50 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: cynthia

Last Name: phakos

Email Address: cynthia@koffkaphakos.com

Affiliation: Mirai Owner

Subject: CARB comments on LCS - Hydrogen stations and fuels

Comment:

Hydrogen is only as sustainable as it is made. Therefore - Solar ,  
Recycled water would make it more so. I have has FUEL CELL since  
2016 - Stations are getting better - Fuel is becoming more  
expensive. Keep this Technology going.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 11:57:57

No Duplicates.

## **Comment 51 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Pam

Last Name: McKown

Email Address: pambrimck@gmail.com

Affiliation: Climate Action California

Subject: CARB meeting 11/8/24 on Proposed Amendments to LCFS

Comment:

We, from Climate Action California, recommend that the Board not approve the Proposed Amendments to the Low Carbon Fuel Standard (LCFS).

My comments cover five points. First, your Environmental Justice Advisory Committee's proposal to cap biomass-based diesel credits at 1.2 billion gallons per year should be adopted instead of the proposed guardrails for crop-based biomass-based diesel that are inadequate and flawed. Second, the just-announced, reckless Sustainable Aviation Fuel Partnership should not be adopted. Third, the transition to electric passenger vehicles needs to be accelerated, as recommended by the United Nations Environment Program's recent 2024 Emissions Gap Report, by incorporating popular EV programs, inactive because of budget cuts, into the LCFS and changing the Advanced Clean Cars II date for selling only new light-duty electric vehicles in California to 2030. Fourth, caps on ethanol need to be introduced. Fifth, the link between rising food prices and increasing credits for crop-based biofuels should be acknowledged and measured.

1) Adopt the EJAC's proposal to cap biomass-based diesel credits at 1.2 billion gallons (DGE) per year instead of the proposed guardrails for crop-based biomass-based diesel

In general, the proposal's estimated reductions in greenhouse gas emissions hinge on the accuracy of the estimated carbon intensity(CI) values for alternative fuels. We find all the estimates for alternative combustion fuels to be underestimated, some so much so that they should not be entitled to any credits. Indirect land use change (ILUC) estimates have not been re-evaluated since 2015. Satellite data since then has shown that tropical forest destruction rates due to conversion to agriculture have accelerated. This increase in deforestation rates has been linked to increases in biofuel usage. A University of Maryland land use model, based on its Carbon Tracker satellite data, estimates the carbon intensity of all vegetable oil-based diesels to be greater than fossil diesel's CI. European Union(EU) models reach the same conclusion. To stem deforestation, the EU capped credits for all lipid-based diesels used for road transport at 2020 consumption levels. ARB's delay in updating its ILUC values has allowed renewable diesel consumption in California to reach unsustainable levels. This needs to be checked and reversed.

The proposed guardrails for crop-based biomass-based diesel are insufficient and would encourage fraud and deforestation. It is easy to mislabel vegetable oil as used cooking oil and difficult to

detect. Guard rails for biomass-based diesel only work if they apply to all lipid feedstocks.

2) Do not adopt the reckless Sustainable Aviation Fuel Partnership with Airlines for America

The proposed Sustainable Aviation Fuel Partnership with Airlines for America is shockingly irresponsible. Currently, there are no actually sustainable aviation fuels available, except possibly used cooking oil and animal fat, but the supply of these is fixed and already receiving credits in the US and EU. In 2023, the EU introduced mandates for sustainable aviation fuel for intra-EU flights. It disallowed crop-based fuels from receiving any credits, but it did not cap used cooking oil or animal fat for SAF crediting. As a result UCO imports increased dramatically. Recent investigations discovered that most of the imports were actually palm oil. This is what California can expect, if it bothers to look closely enough. This is an irresponsible partnership that will destroy tropical forests, boreal forests and the few remaining natural grasslands in this country. It makes a mockery of the US pledge, along with 136 other countries, at COP 26 to end deforestation by 2030. This agreement alone is reason enough to vote against the proposed amendments. If CARB wants to give SAF credits, it should limit them to domestic supplies of animal fats and used cooking oils and discontinue eligibility of those residues for biomass-based diesel credits. In any case, credits for lipid-based SAF should be included in the 1.2 billion gallon cap proposed by the EJAC.

3) The transition to electric passenger vehicles needs to be accelerated, as recommended by the United Nations Environment Program's 2024 Emissions Gap Report, by incorporating popular EV programs, inactive because of budget cuts, into the LCFS and changing the Advanced Clean Cars II date for selling only new light duty electric vehicles in California to 2030

The United Nations Environment Program just released its 2024 Emissions Gap Report, recommending that countries concentrate on accelerating programs with agreed-upon, cost-effective technological solutions in order to keep 2030 and 2035 climate goals in sight. The programs recommended for acceleration were renewable electricity, passenger electric vehicles and halting deforestation. This is what California should be doing to meet its 2030 and 2035 emissions reductions goals. California's EV market share of new vehicle sales failed to increase this year. Popular rebate programs such as the Clean Vehicle Rebate Project (CVRP) and Clean Cars 4 All were not funded in last year's budget, nor this year's or next year's estimated budget. Similarly, the major utilities stopped issuing rebates under their California Clean Fuel Reward program in 2022. We strongly recommend that the CVRP and Clean Cars 4 All programs be incorporated into the LCFS program so they will be consistently funded. This would ensure an adequate supply of credits for fossil fuel producers to purchase as biomass-based credits are reduced.

Norway has shown that people will purchase EVs if financial incentives are large enough to make them substantially cheaper than internal combustion energy (ICE) vehicles. Starting in January, Norway will sell only electric passenger vehicles, 10 years ahead of California's schedule. Other European countries will stop selling new ICE vehicles beginning in 2030. Instead of eliminating rebates for EVs when California's adoption of passenger EVs seemed to be ahead of schedule, ARB should have moved the date for ceasing

new ICE vehicle sales up to 2030. This in conjunction with more credits for the transition to electric vehicles, including trucks, would ensure that greenhouse gas emission reductions exceed those of the current proposal. While fossil fuel sales might increase initially, by 2030 and beyond they would be much lower. California must focus on known solutions for reducing greenhouse gas emissions not on combustion fuels for which scientist's don't agree whether they actually reduce emissions or not.

4) Caps on ethanol need to be introduced

The latest research on ethanol consumption in the US from 2008-2016 concluded that the rapid adoption of ethanol during this period failed to reduce greenhouse emissions. It estimated the carbon intensity of corn ethanol to be greater than that of the gasoline it replaced. This supports phasing out corn ethanol credits, not allowing them to increase in the future as many airlines and ethanol producers are planning on.

5) The link between increasing crop-based alternative fuels and rising food prices must be acknowledged and measured

Governor Newsom has focused on the link between the LCFS and rising gas prices, but has failed to recognize the stronger link between the LCFS and rising food prices. Numerous studies have commented on this link which presents a compelling reason for phasing out crop-based fuels before 2030.

The LCFS's tragic preference for combustion fuels is unscientific, outdated and harmful to all of us. Scientific experts have identified acceleration of the transitions to clean electricity and to electric cars and trucks as our best option for reducing greenhouse gas emissions by 2030 and 2035 sufficiently to keep Paris Agreement goals alive. ARB should listen more to these experts and less to the renewable fuel providers that are profiting financially from the LCFS.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 12:09:09

No Duplicates.

## **Comment 52 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Cynthia  
Last Name: Cannady  
Email Address: cccannady@gmail.com  
Affiliation: Cannady Law Office

Subject: Low Carbon Fuel Standard  
Comment:

I am very concerned about the impact of air pollution on public health. I urge you to vote NO on LCFS amendments!

If you have ever known anyone with asthma, you know that it is a terrible illness that robs people of their comfort, their livelihood and their very lives. I had a dear friend who died in an asthma attack, gasping for breath. How terrible!

And the reality is that the poor and people of color suffer disproportionately from asthma and other respiratory illnesses.

In addition to the serious impact on asthma and respiratory diseases, we in California have an opportunity to transition to new technologies. We should not be using biomethane and biodiesel...why not electrify?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 12:07:08

No Duplicates.

## **Comment 53 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Tim  
Last Name: Taylor  
Email Address: [timtaylor264@gmail.com](mailto:timtaylor264@gmail.com)  
Affiliation: NFIB

Subject: LCFS Amendments  
Comment:

November 8, 2024

NFIB Testimony before the California Air Resources Board meeting on November 8, 2024, in Riverside, submitted to [ww2.arb.ca.gov/applications/public-comments](http://ww2.arb.ca.gov/applications/public-comments)

Good afternoon, Tim Taylor with the National Federation of Independent Business.

First of all, I'd like to thank Judy Nottoli with CARB, who does a great job in her role of reaching out and engaging with the business community, including NFIB.

California's economic engine is fueled in large part by small businesses. Over 95% of all businesses are small businesses and they generate about half of the country's GDP.

I want to be clear that we are not opposed to the greenhouse gas emissions goals of the state, but the choice today is not one of endorsing a zero-emissions, electrification of the state, it's one of subsidizing bio-fuels.

When we speak with our small business members throughout California, they express great concerns about the cost increases associated with these LCFS proposed amendments. Specifically, they cite the potentially massive gasoline price hikes and the adverse impacts those increases will have on their businesses and the rippling effect it will have on all Californians, without actually improving the air quality of the state.

Originally CARB had indicated that these amendments could increase prices at the pump by some 47 cents a gallon. Later, CARB revised that number, which seems to have been confirmed today, and indicated that the cost increase may be negligible. What changed? What is the new methodology or inputs that account for that revision?

Currently, California pays the highest prices for gasoline at the pump--about a \$1.69 over the national average. Tacking on an additional 50 cents to that number would be crushing to small businesses.

Employees and employers who already face inflationary hardships and soaring rents would find their already expensive commutes even more economically challenging.



Additionally, the downstream economic impact on the entire supply chain could be staggering, further driving up the costs of goods and services throughout California.

It's challenging to understand how these amendments will improve the lives of Californians. NFIB believes that these amendments will not improve our air quality but will certainly exacerbate the economic woes of our small business owners and their employees.

NFIB respectfully asks for a no vote on these proposed amendments.

Sincerely,

Tim Taylor  
Legislative Director  
National Federation of Independent Business (NFIB)

Attachment: [www.arb.ca.gov/lists/com-attach/8147-lcfs2024-AmEGYQd0WWhQCVUh.pdf](http://www.arb.ca.gov/lists/com-attach/8147-lcfs2024-AmEGYQd0WWhQCVUh.pdf)

Original File Name: CARB Testimony on Letterhead.pdf

Date and Time Comment Was Submitted: 2024-11-08 12:15:52

No Duplicates.

**Comment 54 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Tom

Last Name: Van Heeke

Email Address: tvanheeke@rivian.com

Affiliation: Rivian Automotive

Subject: Written Copy of Spoken Testimony

Comment:

See attached for a written version of Rivian's remarks as intended to be delivered via remote participation during the verbal public comment portion of the November 8 hearing. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/8148-lcfs2024-UCJRPlcgADpSNVU7.pdf](http://www.arb.ca.gov/lists/com-attach/8148-lcfs2024-UCJRPlcgADpSNVU7.pdf)

Original File Name: RivianPublicComment\_November8CARBHearing.pdf

Date and Time Comment Was Submitted: 2024-11-08 12:23:14

No Duplicates.

## **Comment 55 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: James

Last Name: Millington

Email Address: jmillington@computer.org

Affiliation:

Subject: Adopt Proposed Changes to the LCFS Please!

Comment:

Chair and Members of the California Air Resources Board,

As an early adopter of a fuel cell electric vehicle (I have a 2023 Toyota Mirai), it is imperative to fix California's Low-Carbon Fuel Standard (LCFS).

The LCFS has been one of the strongest carbon markets in the world, driving significant private investment in achieving the carbon intensity (CI) reductions in transportation fuels and leading the way for more than a half dozen other states who are developing similar programs.

The strength of this market signal was working and lowered hydrogen prices to the \$10-\$12/kg range. Station developers were building stations without public grant funding. However, post-pandemic the LCFS market has ceased to support fuel cell electric vehicles and hydrogen station development.

We must immediately fix the LCFS to drive investment to hydrogen refueling stations which are necessary to achieve California's 2045 carbon neutrality goal. The expansion of infrastructure credits for zero-emission vehicle charging and hydrogen refueling are critically important to achieve California's zero emission vehicle regulations and executive orders.

I urge you to support the adoption of the proposed changes to the LCFS please!

Best Regards,

James Millington

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 12:45:03

No Duplicates.

## **Comment 56 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Ken

Last Name: Lange

Email Address: klange@thegrid.net

Affiliation:

Subject: proposed low carbon fuel standard amendment

Comment:

Please be respectful of the California families trying to survive the increased costs of all goods by not again increasing the cost of fuel.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 12:40:48

No Duplicates.

## **Comment 57 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Andrea

Last Name: Mitchel

Email Address: andrea.mitchel@gmail.com

Affiliation:

Subject: Low Carbon Fuel, Increases in Fuel Prices

Comment:

I urge you to NOT approve of the Proposed Low Carbon Fuel Standard Amendments. This will significantly increase the price of fuel, resulting in an unjust punishment of the most marginalized, low-income population. Individuals who need to travel great distances to work will be unjustly impacted resulting in an even greater economic disparity in our great state. DO NOT approve of the proposed low carbon fuel standard amendment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 12:46:40

No Duplicates.

## **Comment 58 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Stephen

Last Name: Rosenblum

Email Address: poll@rosenblums.us

Affiliation: Climate Action California

Subject: LCFS amendments

Comment:

I have worked as a scientist for over 50 years and have created many computer models. The most important thing you learn about modelling is that if you start with bad assumptions, you end up with incorrect conclusions. The crucial bad assumption in the LCFS is that fuels created from sources of recent biological origin do not harm the climate and are thus sustainable. This fallacy is easily exposed by the fact that the atmosphere does not know if a specific CO<sub>2</sub> molecule comes from a plant that died a million years ago or just last week. It still has an atmospheric lifetime of 100 years. LCFS crediting for dairy manure digester gas(DMG) and renewable diesel(RD) are two examples of this fallacy. While CARBOB has a CI of 100 g CO<sub>2</sub>e/MJ, RD has a CI=50, DMG CI=-150 while wind and solar electricity have CI=10 while generating no CO<sub>2</sub> during operation. How can a technology that generates no CO<sub>2</sub> be worse for the climate than DMG which generates the same amount of CO<sub>2</sub>/MJ as fossil natural gas when burned?

As we heard in the CARB presentation today, we cannot solve the climate crisis by continuing to combust carbon. LCFS must quickly phase out all credits for carbonaceous fuels and reserve future credits only for electric transportation based on wind and solar PV electricity. CARB staff has done a lot of good work here, but these two issues require them to go back to the drawing board. I urge the Board to reject this proposal. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 12:10:22

No Duplicates.

**Comment 59 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: graham

Last Name: noyes

Email Address: graham@noyeslawcorp.com

Affiliation:

Subject: comment

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8153-lcfs2024-BnQBZIU9WHgCYVM9.pdf](http://www.arb.ca.gov/lists/com-attach/8153-lcfs2024-BnQBZIU9WHgCYVM9.pdf)

Original File Name: raisen.pdf

Date and Time Comment Was Submitted: 2024-11-08 12:58:27

No Duplicates.

## **Comment 60 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Kathy

Last Name: Dervin, MPH

Email Address: dervin.kathy@gmail.com

Affiliation: Protect Monterey Bay, 350 Bay Area Actio

Subject: Reject this version of the LCFS

Comment:

Dear CARB board members and staff,

I have been listening on line to all of the speakers at the Riverside board meeting this morning, esp those from the Inland empire and the Central Valley. As you have heard today, far too many people throughout CA are being harmed by asthma and other respiratory diseases, caused in part by burning diesel, biodiesel and biomethane in trucks and other vehicles that should be electrified. We need to move directly and more rapidly to transportation electrification and put the money that is going into these LCFS fuels programs into electrification. Please reject the current staff recommendation, go back to work and come up with a better regulation. We support the EJAC's recommendations and many EJ, enviromental and health groups who have identified specific changes and improvements.

Save lives! Listen to Senator Flores! Vote No!

Kathy Dervin

350 Bay Area, Transportation Cmt

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:00:01

No Duplicates.



## **Comment 61 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: mark

Last Name: dickson

Email Address: mark@economic.com

Affiliation:

Subject: Hydrogen Fuel!

Comment:

When I bought my Hydrogen Mirai in 2021, fuel cost was \$13/Kilogram. It has now increased to \$36/Kilogram, which is unsustainable for me. I believe Hydrogen is the answer for zero emission vehicles, but the infrastructure needs to improve and barriers removed to drive the price down. Please do what you can to help this effort!

Thanks

Mark Dickson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:11:44

No Duplicates.

## **Comment 62 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Tim

Last Name: McHargue

Email Address: timothymchargue@cs.com

Affiliation: Calif. Hydrogen Car Owners Assoc.

Subject: Adopt Proposed Changes to the LCFS TODAY!

Comment:

Chair and Members of the California Air Resources Board,

I have owned my Toyota Mirai for three years. I love it. However, it has presented challenges for me in terms of fueling and pricing. I hope I can continue to afford and justify owning the Mirai. The struggles I have experienced may have deterred many others, which is a shame, as pivoting from petroleum is a critical step in terms of the climate crisis and environmentally sound practices.

As an early adopter of a fuel cell electric vehicle, it is imperative to fix California's Low-Carbon Fuel Standard (LCFS). The LCFS has been one of the strongest carbon markets in the world, driving significant private investment in achieving the carbon intensity (CI) reductions in transportation fuels and leading the way for more than a half dozen other states who are developing similar programs.

The strength of this market signal was working and lowered hydrogen prices to the \$10-\$12/kg range. Station developers were building stations without public grant funding. However, post-pandemic the LCFS market has ceased to support fuel cell electric vehicles and hydrogen station development.

We must immediately fix the LCFS to drive investment to hydrogen refueling stations which are necessary to achieve California's 2045 carbon neutrality goal. The expansion of infrastructure credits for zero-emission vehicle charging and hydrogen refueling are critically important to achieve California's zero emission vehicle regulations and executive orders.

I urge you to support the adoption of the proposed changes to the LCFS TODAY!

Respectfully,

Tim McHargue

timothymchargue@cs.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:11:32

No Duplicates.

## **Comment 63 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Brandon

Last Name: Friend

Email Address: brandon.friend@vopak.com

Affiliation: Vopak

Subject: Methanol as a marine fuel

Comment:

My name is Brandon Friend, and I am a Site Director at Vopak. Vopak provides storage and infrastructure solutions at ports around the world. Vopak operates at several ports in California, and we urge the Board to adopt a resolution that would involve amending the LCFS regulations to allow for credit generation of methanol as a marine fuel. There are significant opportunities to generate low-carbon methanol and we believe that our existing infrastructure could quickly support methanol as a marine fuel. Providing LCFS credits would at least speed implementation of this opportunity to reduce greenhouse gas emissions as well as emissions of traditional pollutants. We hope the Board will take this important step today and that any amendments can be adopted in a timely manner. Thank you for allowing me to provide these brief comments remotely.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:08:52

No Duplicates.

**Comment 64 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Ingrid

Last Name: Malmgren

Email Address: imalmgren@pluginamerica.org

Affiliation: Plug In America

Subject: Comments Supporting Amendments to Low Carbon Fuel Standard

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8158-lcfs2024-BzVcalBjWD8CNQEw.pdf](http://www.arb.ca.gov/lists/com-attach/8158-lcfs2024-BzVcalBjWD8CNQEw.pdf)

Original File Name: 20241108 Plug In America - CARB LCFS Comments.pdf

Date and Time Comment Was Submitted: 2024-11-08 13:11:21

No Duplicates.

**Comment 65 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Orran

Last Name: Balagopalan

Email Address: obalagopalan@smwlaw.com

Affiliation: Shute, Mihaly & Weinberger LLP

Subject: Leadership Counsel for Justice and Accountability et al Comments

Comment:

Please see the attached comments on behalf of the Leadership Counsel for Justice and Accountability, Central Valley Defenders of Clean Water & Air, Animal Legal Defense Fund, and Food & Water Watch on the Final Environmental Impact Analysis and Responses to Comments on the Proposed Amendments to the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/8159-lcfs2024-UDxXNAdnWG9QMwZ0.zip](http://www.arb.ca.gov/lists/com-attach/8159-lcfs2024-UDxXNAdnWG9QMwZ0.zip)

Original File Name: Leadership Counsel 11-8-24.zip

Date and Time Comment Was Submitted: 2024-11-08 12:55:58

No Duplicates.

## **Comment 66 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Ningning

Last Name: Guo

Email Address: guoningning@me.com

Affiliation:

Subject: Adopt Proposed Changes to the LCFS TODAY!

Comment:

Chair and Members of the California Air Resources Board,

As an early adopter of a fuel cell electric vehicle, it is imperative to fix California's Low-Carbon Fuel Standard (LCFS). The LCFS has been one of the strongest carbon markets in the world, driving significant private investment in achieving the carbon intensity (CI) reductions in transportation fuels and leading the way for more than a half dozen other states who are developing similar programs.

The strength of this market signal was working and lowered hydrogen prices to the \$10-\$12/kg range. Station developers were building stations without public grant funding. However, post-pandemic the LCFS market has ceased to support fuel cell electric vehicles and hydrogen station development.

We must immediately fix the LCFS to drive investment to hydrogen refueling stations which are necessary to achieve California's 2045 carbon neutrality goal. The expansion of infrastructure credits for zero-emission vehicle charging and hydrogen refueling are critically important to achieve California's zero emission vehicle regulations and executive orders.

I urge you to support the adoption of the proposed changes to the LCFS TODAY!

Respectfully,  
Ningning Guo

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:22:18

No Duplicates.

## **Comment 67 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Wayne

Last Name: Trull

Email Address: appguy2004@yahoo.com

Affiliation:

Subject: Carb vote

Comment:

Don't do this, it'll make no difference to anything except our costs. California inflation all by itself. Like always it'll affect low income people you claim to care about. Use common sense.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:26:11

No Duplicates.



**Comment 68 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: JOHN

Last Name: ELLINGWOOD

Email Address: JTELLINGWOOD@ATT.NET

Affiliation:

Subject: CRIMINAL

Comment:

What you are doing is Criminal to the people of California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:31:34

No Duplicates.

## **Comment 69 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Anil

Last Name: Mehta

Email Address: 14anilmehta@gmail.com

Affiliation:

Subject: Adopt Proposed Changes to the LCFS TODAY!

Comment:

Chair and Members of the California Air Resources Board,

As an early adopter of a fuel cell electric vehicle, it is imperative to fix California's Low-Carbon Fuel Standard (LCFS). The LCFS has been one of the strongest carbon markets in the world, driving significant private investment in achieving the carbon intensity (CI) reductions in transportation fuels and leading the way for more than a half dozen other states who are developing similar programs.

The strength of this market signal was working and lowered hydrogen prices to the \$10-\$12/kg range. Station developers were building stations without public grant funding. However, post-pandemic the LCFS market has ceased to support fuel cell electric vehicles and hydrogen station development.

We must immediately fix the LCFS to drive investment to hydrogen refueling stations which are necessary to achieve California's 2045 carbon neutrality goal. The expansion of infrastructure credits for zero-emission vehicle charging and hydrogen refueling are critically important to achieve California's zero emission vehicle regulations and executive orders.

I urge you to support the adoption of the proposed changes to the LCFS TODAY!

Respectfully,

Anil Mehta

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:33:25

No Duplicates.

## **Comment 70 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Ravi

Last Name: Sekhon

Email Address: rsekhon@centerlinelogistics.com

Affiliation: Centerline Logistics

Subject: Public Hearing to consider proposed Low Carbon Fuel Standard Amendments

Comment:

My name is Ravi Sekhon, and I am the Director of Engineering and Sustainability at Centerline Logistics. Thank you for the opportunity to provide these brief comments remotely. Centerline Logistics is a leading marine transportation company operating along the U.S. West, East, and Gulf Coasts, as well as in Alaska, Hawaii, and Puerto Rico. We specialize in transporting and storing petroleum products, providing ship-assist and escort services, and conducting general cargo and rescue towing.

We are passionate about our work and committed to the opportunities for decarbonizing marine transportation. We believe methanol can serve as an effective marine fuel. In fact, we recently introduced an innovative solution called Clean Harbor Alternative Mobile Power (CHAMP). This platform will use methanol-fueled generators to supply clean power and thereby reduce emissions from vessels such as containerships, cruise ships and tankers by up to 93% while they are idling at port. Offering LCFS credits for initiatives like CHAMP would significantly accelerate the adoption of methanol in the marine industry. Additionally, we believe our existing bunkering operations, which involve delivering marine fuels to other vessels, can support methanol with minimal infrastructure adjustments compared to other alternatives.

We urge the Board to act swiftly to enable opt-in credits for alternative fuels like methanol within the marine sector. We support a resolution that initiates and expedites these necessary amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/8164-lcfs2024-UWMANldkWD8DKFR1.pdf](http://www.arb.ca.gov/lists/com-attach/8164-lcfs2024-UWMANldkWD8DKFR1.pdf)

Original File Name: 2024-11-8 - CLL Statement in support of LCFS.pdf

Date and Time Comment Was Submitted: 2024-11-08 13:18:16

No Duplicates.

## **Comment 71 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Marc

Last Name: B

Email Address: lo\_down\_home@yahoo.com

Affiliation:

Subject: We CAN do multiple things at once - without crushing the Californian family.

Comment:

Greeting Board,

I had been watching public comments for LCBA over two hours and I noticed a few things. First, I haven't seen a commenter that will be concerned about life without dairy or the economic impact on the California resident for these programs. We know if passed it will raise gas prices at least 0.47 / per gallon. Not acceptable. On this day November 8, 2024, I did hear some inland commenters have a concern with pollution. Now, pollution is one that has minimal debate from either side, we want less. I happened to be on leave from work today, but nobody seems to represent my concerns or my community. Really, wouldn't you wonder why so many working people didn't get to go to public comments much or most of the commenters are MAKING MONEY from LCFS. Person after person is making money from what was called an "important climate issue" today. That should concern you. This state is not prepared for an all electric cars. But, could be worked on together with input from regular people whether or not they believe in climate change or not and want less pollution and clean air. Companies like Ford scrapped their percentage electric car production, they will make less. That should be a concern, but didn't hear that today. We just had a Presidential Election where inflation and cost of living was the number one issue. Was Climate Change number 2? No, Immigration was number 2. The President Elect gained in almost EVERY county in America, saying we need to make America more affordable.

So I am hoping you figure out a way forward WITHOUT financially burdening the California Resident with higher gas prices and removing their/our freedoms. It is not acceptable to raise the costs of California refineries while we try to find ways to have an agreement.

Okay, lets take a look at this:

Significant Statewide Adverse Economic Impact Directly Affecting Business, Including Ability to Compete (Gov. Code, §§ 11346.3, subd. (a), 11346.5, subd. (a)(7), 11346.5, subd. (a)(8)):

"The Executive Officer has made an initial determination that the proposed regulatory action would not have a significant statewide adverse economic impact directly affecting businesses, including the ability of California businesses to compete with businesses in other states, or on representative private persons..."

Well, this just isn't true, mathematics and economics would reveal that if the price of gasoline goes up - everything goes up. Right off the bat if transportation costs rise there is an economic impact.

Let's move on to this:

Your listed objectives and benefits.

Your stated objective.

- Increasing the stringency of the program to more aggressively decarbonize fuels and thereby reduce our dependence on fossil fuels;

We don't need stringency to accomplish reducing dependence on fossil fuels. For example, I would be open to having an electric car. In fact, I sought out a hybrid truck. The cost for those cars is very expensive, there are not enough charging locations. Most importantly, the owner needs to plug that car in for a charge. What is the source of the electricity? Mainly fossil fuels and it will be for a long time.

- Strengthening the program's equity provisions to promote investment in disadvantaged, low-income and rural communities;

What is this equity crap? I did hear inland folks with a pollution concern, and I get that. The other side of the LEGITIMATE coin is making regular people that want to go to work, raise their kids, maybe have some fun here and there not be able to do so. Do you want to turn more Californians into disadvantaged low-income people that are just trying to get by? Let's say I can financially handle it. Can the low-income people handle it?

- Supporting electric and hydrogen truck refueling;

Sure, like I mentioned, multiple things can be done at once to foster a working together atmosphere. But, if you are burying people because they have gas powered cars and do NOT have the money to buy another more expensive car quicker than they can afford to do, that will have adverse effects.

- Incentivizing more production of clean fuels needed in the future, such as low-carbon hydrogen;

I noticed you don't speak about nuclear power? Why not, I live near a recently shut down nuclear power plant. What a mess up that was shutting it down. To do SOME of the things you want done would require...that is right doing more than one thing at once...explore nuclear power and the mini versions of it. Additionally, why do WE have to pay for this, if it is a great idea all around, then the private sector would jump on it with less bureaucracy, fraud, waste, abuse with "programs" or "contracts". But, certainly, explore low-carbon hydrogen.

- Supporting methane emissions reductions and deploying biomethane for best uses across transportation; and
- Strengthening guardrails on crop-based fuels to prevent deforestation or other potential adverse impacts.

Board Members and folks, these two need to be explored much further scientifically. For example, if one was to even believe in methane emissions then farmers would be exploring in different types of feed and I could learn EVERYTHING about it. Fact is I can't, because it is a giant unknown. One study stated that methane is 80 times more more potent at warming than carbon dioxide. Well, then why worry about carbon dioxide then? There is no direct scientific link with methane, but are seeking people change their diets to processed plant food? Again taking away our freedoms.

How come wildfires are not included in the carbons studies?

Sadly, the longer this comment section went on, the more I/we heard this comments section the more I/we heard this large LCBA Industrial Complex. Look, I've said myself and many others want good air. But what really needs to be done is working together on many of these matters without burdening the working Californian and bringing in another wave of massive inflation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:46:47

No Duplicates.

## **Comment 72 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Mike

Last Name: McCarthy

Email Address: mikem@radicalresearch.llc

Affiliation: R-NOW

Subject: Oppose the LCFS regulation

Comment:

I'd like to thank CARB staff and the Board for their work on this.

There is a fundamental tension in the LCFS that echoes the debate around AB 52 (global warming act) and AB 617 (community air protection program). The stakeholders that are endorsing this well spoken individuals paid to work in this area, who are likely to directly profit from this 'green' transition. This is a huge program and it has large ramifications for business, consumers, and many other residents of California.

Unfortunately, this LCFS is not supported by the communities that are disproportionately impacted by existing facilities where these fuels will be produced or used. We don't stand to make any money from this, other than maybe some air monitoring to quantify how disproportionately impacted communities are affected. We just get the negative externalities - refineries, water quality impacts, and increased truck traffic that goes up 60% during a time when population growth is projected to be flat.

I urge the Board to get the buy-in of communities that live next to these facilities in addition to those of the business stakeholders.

It is not enough to just please the business community. EJAC and EJ communities should not be sidelined when developing policies of this magnitude, but that is what this proposal has done. Some of the business stakeholders need to be made sad, it can't just be on the backs of our most vulnerable and marginalized communities.

Thank you for your attention to this matter.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:36:06

No Duplicates.

## **Comment 73 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Eulalia

Last Name: Halloran

Email Address: eulaliahalloran@earthlink.net

Affiliation:

Subject: lcsf2024

Comment:

As an owner of a hydrogen car, I urge the board to promote and support increased green hydrogen refueling stations for commercial and private use. I would like to use my car to travel outside the Los Angeles basin in order to visit family, vacation and travel throughout California and hopefully nationwide. Thank you.  
Eulalia Halloran

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:46:22

No Duplicates.



## **Comment 74 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Kyle

Last Name: Heiskala

Email Address: kyleh@environmentalhealth.org

Affiliation: Environmental Health Coalition

Subject: Vote NO! Fix the LCFS

Comment:

On behalf of Environmental Health Coalition, our organization stands in solidarity with other frontline environmental justice communities across the state of California who are living with the negative impacts from the LCFS program. The climate crisis demands bolder action from CARB. We cannot continue to gift public funds to polluting industries. Do not pass the proposal. It sets in place for too long, harmful and dangerous fuels that are climate dead ends.

Credits need to be adjusted to maximize benefits for electric vehicles and not biofuels or hydrogen produced by fossil fuels. The proposed amendments will not help electrification of heavy-duty freight enough and will perpetuate air and water pollution from dairies. The LCFS must be fixed to cut harmful methane crediting, place a cap on renewable diesel credits, include aviation fuels in the program and support clean shipping. I urge a no vote. Make the amendments needed to protect EJ communities before locking in a broken program.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:46:17

No Duplicates.

**Comment 75 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Thomas

Last Name: Cretney

Email Address: tcretney@yahoo.com

Affiliation:

Subject: corrected Public Response

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8169-lcfs2024-BWhWNVwwUm4GX1lh.pdf](http://www.arb.ca.gov/lists/com-attach/8169-lcfs2024-BWhWNVwwUm4GX1lh.pdf)

Original File Name: Memo Style.pdf

Date and Time Comment Was Submitted: 2024-11-08 14:06:32

No Duplicates.

## **Comment 76 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Jose

Last Name: Chavez

Email Address: chavezluc@me.com

Affiliation: Fuel Cell Vehicle Driver

Subject: Adopt Proposed Changes to the LCFS TODAY!

Comment:

Chair and Members of the California Air Resources Board,

As an early adopter of a fuel cell electric vehicle, I urge you to address California's Low-Carbon Fuel Standard (LCFS). This program has been a global leader in reducing carbon emissions in transportation fuels, inspiring over six other states to adopt similar approaches.

Previously, the LCFS helped lower hydrogen prices to \$10-\$12/kg, and stations were being built without public funding. However, since the pandemic, the LCFS market no longer supports fuel cell vehicles and hydrogen station development.

We need to fix the LCFS now to attract investment in hydrogen refueling stations, essential for reaching California's 2045 carbon neutrality target. Expanding credits for zero-emission vehicle charging and hydrogen refueling is crucial to meeting California's clean vehicle goals.

Please support the adoption of the proposed LCFS changes today!

Respectfully,

Jose Chavez

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 14:10:08

No Duplicates.

## **Comment 77 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Renee

Last Name: Nghiem

Email Address: nghiemr@gmail.com

Affiliation:

Subject: Proposed Changes to the LCFS, HRI Credits

Comment:

California has seen how the LCFS credits have helped spur the development of hydrogen refueling stations over the years. Most recently, it has seen how a poorly administered LCFS can stunt its progress.

As an early adopter of fuel cell vehicles, I support the proposed changes to the LCFS so that California can continue to fulfill its ZEV mandates while embracing all pathways toward that ambitious goal. In particular, the HRI credits must be bolstered so that station developers feel supported enough to inject private funding into developing the infrastructure.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 13:58:36

No Duplicates.

**Comment 78 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Stefan

Last Name: Unnasch

Email Address: unnasch@lifecycleassociates.com

Affiliation: Life Cycle Associates

Subject: Support LCFS and Add Methanol

Comment:

Please adopt the modifications to the LCFS and include methanol as  
an opt-in fuel.

Attachment: [www.arb.ca.gov/lists/com-attach/8173-lcfs2024-B2sFYAdnBQkLIFUK.pdf](http://www.arb.ca.gov/lists/com-attach/8173-lcfs2024-B2sFYAdnBQkLIFUK.pdf)

Original File Name: LCA\_-\_LCFS 8Nov24.pdf

Date and Time Comment Was Submitted: 2024-11-08 14:11:19

No Duplicates.

**Comment 79 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: N

Last Name: A

Email Address: Senate.RepublicanCaucus@sen.ca.gov

Affiliation:

Subject: Senate Republican Caucus

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8174-lcfs2024-VzoHZFc7V2tRJAF1.zip](http://www.arb.ca.gov/lists/com-attach/8174-lcfs2024-VzoHZFc7V2tRJAF1.zip)

Original File Name: memostyle.zip

Date and Time Comment Was Submitted: 2024-11-08 14:13:11

No Duplicates.

**Comment 80 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: RAY

Last Name: JOSEPH

Email Address: rayj310@gmail.com

Affiliation:

Subject: VOTE NO

Comment:

VOTE NO

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 14:16:39

No Duplicates.

## **Comment 81 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Keith

Last Name: Malone

Email Address: keithman63@yahoo.com

Affiliation:

Subject: Please adopt the proposed changes to the LCFS and support hydrogen mobility

Comment:

Board members:

I drive a fuel cell electric car, a first-generation Toyota Mirai and her name is Maxine. I have driven fuel cell electric cars for more than ten years in Los Angeles and love them: Honda Clarity, Hyundai Tucson and NEXO, Toyota Mira, gen 1 and gen 2. They're damn fun to drive and they have served me well.

As a result, I have seen the rise in the price per kilogram over the last five years and it concerns me. I am aware of the several causes of the spike in price at the pump, including the Low-Carbon Fuel Standard (LCFS) program. It must be fixed and I implore you to do so.

There are enough studies (CARB, UC Davis, etc.) that show that California light-duty vehicle market needs a mix of drivetrains. I must admit that I am concerned about California placing all of its eggs (or cars) in one technology basket. In addition to creating resiliency in the vehicle market, a strong light-duty hydrogen fueling network will support cars, pickup trucks and, in the near future, medium-duty trucks.

I urge you to support the adoption of the proposed changes to the LCFS. Anything less sends another lousy market signal to automakers, infrastructure developers, fuel producers and others; we've seen enough of that already from the CEC leadership.

Keith Malone

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 14:15:19

No Duplicates.



## **Comment 82 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Jennifer

Last Name: P

Email Address: Jphinney77@hotmail.com

Affiliation:

Subject: Vote No- We can not afford it

Comment:

We can not afford another increase right now. Everyone is nearly getting by with the high cost of food and electricity. Not to mention the increase in our car insurance and home owners insurance. We can not afford for our gas to increase again. California needs to look out for our citizens not further cripple them financially.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 14:24:18

No Duplicates.

**Comment 83 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Lawrence

Last Name: Navin

Email Address: lnavin@methanol.org

Affiliation: Methanol Institute

Subject: Methanol Institute Statement in Support of Resolution to Amend the LCFS  
Regulations to AI

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8179-lcfs2024-BmsHZF0oWWICZQNt.pdf](http://www.arb.ca.gov/lists/com-attach/8179-lcfs2024-BmsHZF0oWWICZQNt.pdf)

Original File Name: Methanol Institute Statement in Support of Resolution to Amend the LCFS  
Regulations to Allow for Low-Carbon Fuels in Marine Applications in Marine Applications to  
Generate LCFS Credits.pdf

Date and Time Comment Was Submitted: 2024-11-08 14:18:07

No Duplicates.

## **Comment 84 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Scott

Last Name: Rothdeutsch

Email Address: scott@rothdeutsch.com

Affiliation: SAR GRN NRG

Subject: Adopt Proposed Changes to the LCFS TODAY!

Comment:

Chair and Members of the California Air Resources Board,

As an early adopter of a fuel cell electric vehicle, it is imperative to fix California's Low-Carbon Fuel Standard (LCFS). The LCFS has been one of the strongest carbon markets in the world, driving significant private investment in achieving the carbon intensity (CI) reductions in transportation fuels and leading the way for more than a half dozen other states who are developing similar programs.

The strength of this market signal was working and lowered hydrogen prices to the \$10-\$12/kg range. Station developers were building stations without public grant funding. However, post-pandemic the LCFS market has ceased to support fuel cell electric vehicles and hydrogen station development.

We must immediately fix the LCFS to drive investment to hydrogen refueling stations which are necessary to achieve California's 2045 carbon neutrality goal. The expansion of infrastructure credits for zero-emission vehicle charging and hydrogen refueling are critically important to achieve California's zero emission vehicle regulations and executive orders.

I urge you to support the adoption of the proposed changes to the LCFS TODAY!

Respectfully,

Scott Rothdeutsch

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 14:37:37

No Duplicates.

## **Comment 85 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Rajni

Last Name: Sheth

Email Address: apsheth@hotmail.com

Affiliation:

Subject: Title: Adopt Proposed Changes to the LCFS TODAY!

Comment:

Title: Adopt Proposed Changes to the LCFS TODAY!

Chair and Members of the California Air Resources Board,

As an early adopter of a fuel cell electric vehicle, it is imperative to fix California's Low-Carbon Fuel Standard (LCFS). The LCFS has been one of the strongest carbon markets in the world, driving significant private investment in achieving the carbon intensity (CI) reductions in transportation fuels and leading the way for more than a half dozen other states who are developing similar programs.

The strength of this market signal was working and lowered hydrogen prices to the \$10-\$12/kg range. Station developers were building stations without public grant funding. However, post-pandemic the LCFS market has ceased to support fuel cell electric vehicles and hydrogen station development.

We must immediately fix the LCFS to drive investment to hydrogen refueling stations which are necessary to achieve California's 2045 carbon neutrality goal. The expansion of infrastructure credits for zero-emission vehicle charging and hydrogen refueling are critically important to achieve California's zero emission vehicle regulations and executive orders.

I urge you to support the adoption of the proposed changes to the LCFS TODAY!

Respectfully,

Rajni Sheth

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 14:41:23

No Duplicates.

## **Comment 86 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Shay

Last Name: Mccoy

Email Address: smccoolpeller@gmail.com

Affiliation:

Subject: public comment -low carbon fuel standard

Comment:

I understand that the board members have six figure salaries and not understand the hardship 90% of Californians are facing with current gas prices.

You are paid by taxpayers, which means you are supposed to do what's best for us. If current gas pricing is already stressing 90% of us and our budgets, then why would you ever entertain raising it more?

If you vote for your amendment, you will be put California into an economic tailspin and more residents will flock out of California.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 14:40:07

No Duplicates.

## **Comment 87 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Donna

Last Name: Waddell

Email Address: ussmermaid@yahoo.com

Affiliation:

Subject: Oppose

Comment:

We are seniors on a fixed income and cannot afford any additional taxes, fees, etc. The proposed restrictions on the oil companies will only result in any costs to them to be passed on to us consumers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 14:51:59

No Duplicates.

**Comment 88 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Alana

Last Name: Langdon

Email Address: [alana.chavezlangdon@fortescue.com](mailto:alana.chavezlangdon@fortescue.com)

Affiliation:

Subject: Fortescue Comments on Proposed Low Carbon Fuel Standard Amendments - Hydrogen  
Comment:

Thank you for the opportunity to submit the attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/8184-lcfs2024-BWNQOVihVnFRMgZ1.pdf](http://www.arb.ca.gov/lists/com-attach/8184-lcfs2024-BWNQOVihVnFRMgZ1.pdf)

Original File Name: Fortescue Comments - CARB LCFS Amendment Rulemaking 11.8.24.pdf

Date and Time Comment Was Submitted: 2024-11-08 14:52:56

No Duplicates.

**Comment 89 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: darrell

Last Name: johnson

Email Address: sapphire2081@gmail.com

Affiliation:

Subject: lcfs

Comment:

please fix lvf's for hydrogen fuel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 14:58:49

No Duplicates.



**Comment 90 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Pete

Last Name: Montgomery

Email Address: Pete@pmontgomeryconsulting.com

Affiliation: Kern Energy

Subject: Kern Energy - Nov. 8 Board Hearing on LCFS

Comment:

Please accept this expanded testimony relative to the Board hearing  
on the LCFS on behalf of Kern Energy.

Attachment: [www.arb.ca.gov/lists/com-attach/8186-lcfs2024-UzgBYIYlBzpWD1M2.docx](http://www.arb.ca.gov/lists/com-attach/8186-lcfs2024-UzgBYIYlBzpWD1M2.docx)

Original File Name: Kern Energy LCFS Board Comments.docx

Date and Time Comment Was Submitted: 2024-11-08 15:02:00

No Duplicates.

## **Comment 91 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Anthony

Last Name: Christlieb

Email Address: tonyc41@earthlink.net

Affiliation:

Subject: Proposed Low Carbon Fuel Standard Amendments

Comment:

Dear board members,

The expansion of infrastructure credits for zero-emission vehicle charging and hydrogen refueling are critically important to achieve California's zero emission vehicle regulations and executive orders.

Californians deserve alternative fuel options to gasoline and electric powered vehicles. Hydrogen production allows us to create electricity to power our vehicles while we are driving instead of the proliferation of charging stations, currently hindering our ability to access hydrogen pumps. Hydrogen is a cleaner, more efficient and potentially less expensive fuel alternative.

I urge the adoption of proposed low carbon fuel standard amendments.

-Anthony Christlieb

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 14:49:30

No Duplicates.

## **Comment 92 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Daniel

Last Name: Mouradian

Email Address: danielmouradian@gmail.com

Affiliation:

Subject: Adopt Proposed Changes to the LCFS TODAY!

Comment:

Chair and Members of the California Air Resources Board,

As an early adopter of a fuel cell electric vehicle, it is imperative to fix California's Low-Carbon Fuel Standard (LCFS). The LCFS has been one of the strongest carbon markets in the world, driving significant private investment in achieving the carbon intensity (CI) reductions in transportation fuels and leading the way for more than a half dozen other states who are developing similar programs.

The strength of this market signal was working and lowered hydrogen prices to the \$10-\$12/kg range. Station developers were building stations without public grant funding. However, post-pandemic the LCFS market has ceased to support fuel cell electric vehicles and hydrogen station development.

We must immediately fix the LCFS to drive investment to hydrogen refueling stations which are necessary to achieve California's 2045 carbon neutrality goal. The expansion of infrastructure credits for zero-emission vehicle charging and hydrogen refueling are critically important to achieve California's zero emission vehicle regulations and executive orders.

I urge you to support the adoption of the proposed changes to the LCFS TODAY!

Respectfully,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 15:26:04

No Duplicates.

**Comment 93 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: James

Last Name: Duffy

Email Address: duffje@msn.com

Affiliation: Former LCFS Branch Chief

Subject: Vote No on LCFS Amendments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8189-lcfs2024-BXNT0lYjBzEKU1A+.pdf](http://www.arb.ca.gov/lists/com-attach/8189-lcfs2024-BXNT0lYjBzEKU1A+.pdf)

Original File Name: Vote No on LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2024-11-08 15:41:22

No Duplicates.

## **Comment 94 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Robert

Last Name: Driver

Email Address: bobdriver1@mac.com

Affiliation: Just a Resident

Subject: Low Carbon Fuel

Comment:

Please do NOT raise our gas prices by enacting this Low Carbon Fuel action! We/I cannot afford it! It won't have a noticeable impact on global warming. Why would kill the residents in California for something that won't make an impact.

NO, No, NO!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 15:43:28

No Duplicates.

**Comment 95 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: James

Last Name: Ottem

Email Address: james.ottem@vpps.net

Affiliation:

Subject: Vote No On Proposed LCFS Amendments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8191-lcfs2024-Uj5UMQNkWHgKUwNg.docx](http://www.arb.ca.gov/lists/com-attach/8191-lcfs2024-Uj5UMQNkWHgKUwNg.docx)

Original File Name: LCFS Comments Final .docx

Date and Time Comment Was Submitted: 2024-11-08 15:25:20

No Duplicates.

## **Comment 96 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Brenda

Last Name: Taylor

Email Address: brendataylor@san.rr.com

Affiliation:

Subject: Oppose gas tax increase

Comment:

Good afternoon.

Please reconsider an increase in the gas tax in California. The additional tax rests on the argument that it disproportionately affects low- and middle-income residents who rely heavily on personal vehicles. California already has some of the highest gas prices in the nation, and a higher gas tax would place an additional burden on individuals struggling with the high cost of living. Small businesses, which often rely on transportation, would also face increased operating costs, potentially leading to higher consumer prices and reduced economic growth. Although some may argue that the revenue would improve infrastructure, but there are alternative funding options, such as redirecting budget surpluses or reassessing spending priorities, which wouldn't directly harm working families. Rather than making life in California even more expensive, the state should explore fairer, less regressive solutions to infrastructure funding that consider the financial strain on everyday Californians.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 16:06:43

No Duplicates.

## **Comment 97 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Rebecca

Last Name: Franke

Email Address: bekka@sonic.net

Affiliation:

Subject: Focus on Zero Emissions Transportation!

Comment:

Please vote "no" to the LCFS update. What we as a state need to focus on is zero emissions transportation - not on transportation fueled by biofuels and dirty hydrogen. I live close to two refineries which have converted to the production of biofuels. Such investments deepen the hole we have dug for ourselves, lengthening the time we pollute our sky with greenhouse gasses. Instead, let's get the fast charging infrastructure in place and incentivize truckers to move to electric vehicles.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 16:17:50

No Duplicates.



## **Comment 98 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Steve

Last Name: Feazel

Email Address: park8@sbcglobal.net

Affiliation:

Subject: carbon intensity of fuels

Comment:

The proposed restriction on the carbon intensity of fuels would lead to higher costs passed through to consumers. These restrictions will cause even more California families into financial distress. The financial pain is real and we are at a tipping point. Please do not implement this proposed regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 16:22:30

No Duplicates.

## **Comment 99 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Mario

Last Name: Del Angel

Email Address: mdelangel@verizon.net

Affiliation:

Subject: Please Adopt Proposed Changes to the LCFS Right Away!

Comment:

Chair and Members of the California Air Resources Board, I bought if you sell vehicle and I am committed to the promise of this technology holds.

But over the last year that commitment has waned as it has become extremely hard to continue to use my vehicle. The cost of hydrogen and the greatly reduced incentives for suppliers to improve infrastructure and supply have made it an extremely frustrating proposition for a supporter of fuel cell vehicles, like myself, to continue to justify support for it. When I first purchased my vehicle more than a year and a half ago I was fully committed to the idea and had every intention to continue to purchase fuel cell vehicles. That position has completely changed and unless support for the LCFS is renewed and strengthened, I cannot see myself continue to support fuel cell technology.

I beg you to support the adoption of the proposed changes to the LCFS TODAY!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 16:12:53

No Duplicates.

## **Comment 100 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Gregory

Last Name: Cane

Email Address: greg@h2tonps.org

Affiliation:

Subject: Adopt Proposed Changes to the LCFS TODAY!

Comment:

Chair and Members of the California Air Resources Board,

As an early adopter of a fuel cell electric vehicle, it is imperative to fix California's Low-Carbon Fuel Standard (LCFS). The LCFS has been one of the strongest carbon markets in the world, driving significant private investment in achieving the carbon intensity (CI) reductions in transportation fuels and leading the way for more than a half dozen other states who are developing similar programs.

The strength of this market signal was working and lowered hydrogen prices to the \$10-\$12/kg range. Station developers were building stations without public grant funding. However, post-pandemic the LCFS market has ceased to support fuel cell electric vehicles and hydrogen station development.

We must immediately fix the LCFS to drive investment to hydrogen refueling stations which are necessary to achieve California's 2045 carbon neutrality goal. The expansion of infrastructure credits for zero-emission vehicle charging and hydrogen refueling are critically important to achieve California's zero emission vehicle regulations and executive orders.

I urge you to support the adoption of the proposed changes to the LCFS TODAY!

Respectfully,

Greg Cane

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 16:25:48

No Duplicates.

## **Comment 101 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024). (At Hearing)**

First Name: Daniel

Last Name: Gaston

Email Address: danielrgaston@gmail.com

Affiliation:

Subject: LCFS

Comment:

I am writing to express my concerns regarding the proposed increase in taxes and fees on California gasoline. These additional costs will inevitably lead to higher prices for goods and services, as businesses will need to pass on the increased fuel expenses to their customers. This will have a negative impact on businesses' bottom lines, potentially leading to lower profits and even job losses. I urge you to reconsider this proposal and find alternative ways to address the state's financial needs without placing an undue burden on businesses and consumers.

Sincerely,  
Daniel Gaston

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 16:36:33

No Duplicates.

**Comment 102 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024). (At Hearing)**

First Name: Vicki

Last Name: Nelson

Email Address: Gvgrandma@yahoo.com

Affiliation:

Subject: CARB

Comment:

We can't take another tax!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-11-08 16:32:22

No Duplicates.

**Comment 1 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-1.**

First Name: Rich

Last Name: Elam

Email Address: relam@ucsd.edu

Affiliation:

Subject: Proposed Low Carbon Fuel Standard Amendments

Comment:

As a retired Bio-science Researcher who has been a pro environment person reading and researching what needs to be done to stop Climate Change I am 100% in favor of any Reduced Carbon rules that can be enacted.

Also if California puts the new Rules in place We set the standard and create new clean energy jobs.

This is only good for the California Public.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-12 17:41:00

No Duplicates.

**Comment 2 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-1.**

First Name: Bonita

Last Name: Lang

Email Address: Beelee1015@yahoo.com

Affiliation:

Subject: Air quality

Comment:

Keep our air clean! Stop poluters @

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-12 17:58:14

No Duplicates.

**Comment 3 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-1.**

First Name: Liam

Last Name: Harwyn

Email Address: liamharwyn@gmail.com

Affiliation: citizen

Subject: Lower Carbon in our atmosphere

Comment:

Capturing carbon and reducing the release of carbon into our atmosphere is incredibly urgent and important for the survival of life on earth and for the air quality for all of us, but especially for those most at risk of developing lung cancers, such as infants, children and those with compromised immunity. The toxins released by climate-caused wildfires and loose carbon regulations pose a constant threat to the health of the public, our food and water sources. The new carbon regulations should place public health before private profits.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-13 06:26:18

No Duplicates.



**Comment 4 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-1.**

First Name: Vincent  
Last Name: Vandenbosch  
Email Address: skitripvv@gmail.com  
Affiliation: Air lines pilot

Subject: Clean Air Clean energy  
Comment:

Look up we have a huge clean energy source 24-7 work on capture and storage SUN & Done! I've been flying and have a Birds Eye view on what we humans are doing to our planet and environment and am personally disturbed.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-13 08:33:39

No Duplicates.

## **Comment 5 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Phil

Last Name: Moore

Email Address: topazes.08.hurdles@icloud.com

Affiliation: NGO

Subject: Exemption of Jet Fuel

Comment:

I strongly protest to the continued exemption of jet fuel from LCFS obligation. Airlines have shown themselves time and time again to not act in any meaningful way to lower their carbon emissions. They speak out of both sides of their mouth, praising SAF and continually asking for more and more incentives, while quietly lobbying behind closed doors against any kind of obligation, whether at federal or state level. California has the opportunity to once again be a pioneer and leader in this area, and finally hold airlines to account through a minimum of equal treatment to all other fossil fuels. Airlines will only ever commit when all feel equal levels of responsibility of emissions reductions. We are not asking for a mandate, though that would be the more effective path as proven in Europe. We are simply asking for aviation to shoulder its fair share of obligation under LCFS, as gasoline and diesel have since the beginning. Anything short risks compromising the integrity of both California's climate leadership as well as the airlines' stated GHG reduction targets. The time for talking and cheap press releases is long past. The time for action is now and CARB can spark this into motion with a simple change to this exemption, ending the free carbon handout to the airline industry and catalyzing the sustainable aviation fuels industry anew

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-13 16:21:31

No Duplicates.

## **Comment 6 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Danny

Last Name: Tonasio

Email Address: datona5@gmail.com

Affiliation:

Subject: Volume standards for soy or canola oil

Comment:

Hello, while I understand the goal of reducing emissions, the draconian edict of "arbitrarily" saying you must be producing in 2023 to have the ability to "wait" until 2028 to adjust your supply chain is illogical and very damaging to companies who have invested near billions to provide California with renewable fuels. Your decision to allow those who were producing in 2023 the ability to "wait" until January 2028 is a nod to common sense, but the deadline of "you have to have been producing in 2023 to get this accommodation is quite harmful to many not only producers of renewable fuels but of their suppliers who have contracts to furnish them with feedstocks. The goal of CARB (end result at least) is to incentivize foreign feedstocks, and punish North American companies.

The 2023 stipulation is harmful and should be removed to allow companies who did not produce in 2023 but are producing now, to be able to adjust in a timely, not harmful manner. Many plants were constructed to supply California with better fuels, yet encountered delays in being built during a very difficult supply chain situation over the last 4-5 years. I ask that you not punish them for an arbitrary deadline and treat them the same as those who have been producing in 2023 and prior it would be extremely harmful if you kept the proposal, but hardly damaging to the goals of CARB.

Thank you,  
Danny Tonasio

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-13 20:01:48

No Duplicates.

## **Comment 7 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Andrea  
Last Name: Carcovich  
Email Address: shakelikemilk@hotmail.com  
Affiliation:

Subject: CARB  
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,  
Andrea Carcovich

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-14 15:32:54

No Duplicates.

**Comment 8 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-1.**

First Name: Scott

Last Name: Nelson

Email Address: play@kiteisland.com

Affiliation:

Subject: Proposed Low Carbon Fuel Standard Amendments (lcfs2024)

Comment:

reduce all pollution levels in California .

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-15 09:32:04

No Duplicates.

**Comment 9 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-1.**

First Name: Stewart

Last Name: Hughes

Email Address: sohughes@heartofiowa.net

Affiliation:

Subject: Used Cooking Oil vs soybean oil in renewable diesel

Comment:

just some comments on proposed changes in renewable diesel  
feedstocks

Attachment: [www.arb.ca.gov/lists/com-attach/7102-lcfs2024-AGNWMVEiBzZWDwhk.docx](http://www.arb.ca.gov/lists/com-attach/7102-lcfs2024-AGNWMVEiBzZWDwhk.docx)

Original File Name: CARB letter.docx

Date and Time Comment Was Submitted: 2024-08-19 10:50:29

No Duplicates.

## **Comment 10 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Ellen

Last Name: Koivisto

Email Address: offstage@earthlink.net

Affiliation:

Subject: "Low" carbon?? Seriously? Gotta be lower than that, now!

Comment:

\* The proposal to remove credits for hydrogen produced from fossil fuels is a positive step. But delaying implementation of this measure until 2030 means production of hydrogen from fossil fuels will continue to receive financial rewards for another five-plus years, thus incentivizing the harm we should be preventing.

\* Biofuels produced from virgin soy or canola oil have major negative consequences, including deforestation, and incentivizing industrial agriculture that generates large amounts of greenhouse gas and other pollution, and drives up food prices. The proposed revision acknowledges such problems, but continues to provide credits for the production of biofuels that include up to 20 percent from these destructive sources. And even this weak restraint will not take effect until 2028. Environmental justice advocates have repeatedly called instead for caps on vegetable-oil based biofuels.

\* The proposed draft continues to provide credits for industrial dairy "biogas." This financial support continues to incentivize the expansion of large-scale factory dairy farms, causing serious harm to the health of surrounding communities, increasing the greenhouse gases and pollution generated by the production of feed for cows confined to barns; concentrated methane emitted by pools of waste; the inevitable leakage of methane during storage and transportation; and greenhouse gas emissions produced by combustion of the product. We urge CARB to phase out support for biomethane as rapidly as possible.

\* Unlike previous versions of the LCFS, the new proposal does not require airlines to take any responsibility for the combustion of fossil jet fuel, even for intrastate travel. This is a step backward, excluding a major source of greenhouse gases and pollution from fossil fuel combustion.

Fix it. Now.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-19 17:30:24



2 Duplicates.

## **Comment 11 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Ben

Last Name: Keller

Email Address: benk@sonic.net

Affiliation:

Subject: Strengthen climate protections to fix LCFS

Comment:

The latest proposed LCFS revision does not go far enough to reform the program. CARB should phase out support for vegetable-oil-based biofuels produced from virgin oil, since the expansion of agricultural lands for biofuel production has large negative climate impacts. CARB must phase out support for biomethane, which is propping up the expansion of polluting factory farms. And the latest proposal leaves airlines off the hook for combustion of jet fuel.

Accounting tricks aside, the lowest-carbon fuel is clean zero-emission electricity. Ultimately, CARB should phase out subsidies for fuels that do not meet this high standard.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-19 20:59:03

No Duplicates.

**Comment 12 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Laura

Last Name: Haider

Email Address: lauragreen.rosenberger@gmail.com

Affiliation: Fresnoans Against Fracking

Subject: Low Carbon Fuel Standard and AB 617

Comment:

Airplanes should be responsible for their emissions and air pollution even if they use low carbon fuels because there are several disadvantaged communities near airports including in Sacramento. Low carbon fuels produced from some crops are energy intensive to grow and/or transport. Then, less land to grow food would cause Californians to import more food on diesel ships and planes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-20 23:01:02

No Duplicates.

**Comment 13 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Dennis

Last Name: Albiani

Email Address: DAlbiani@caladvocates.com

Affiliation:

Subject: Board Member Eisenhower - Posted by Clerk on Commenter's Behalf

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7107-lcfs2024-UzVVJFcJAAwKbgBv.pdf](http://www.arb.ca.gov/lists/com-attach/7107-lcfs2024-UzVVJFcJAAwKbgBv.pdf)

Original File Name: FW\_ Board Member Eisenhower\_Docket.pdf

Date and Time Comment Was Submitted: 2024-08-21 09:23:59

No Duplicates.

## **Comment 14 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: David

Last Name: Gassman

Email Address: dfgassman@aol.com

Affiliation:

Subject: Biofuels

Comment:

Biofuels produced from virgin soy or canola oil have major negative consequences, including deforestation, and incentivizing industrial agriculture that generates large amounts of greenhouse gas and other pollution, and drives up food prices. The proposed revision acknowledges such problems, but continues to provide credits for the production of biofuels that include up to 20 percent from these destructive sources. And even this weak restraint will not take effect until 2028. Environmental justice advocates have repeatedly called instead for caps on vegetable-oil based biofuels.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-21 10:45:08

No Duplicates.

**Comment 15 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Michael

Last Name: Daley

Email Address: mdaley@carbonsolutionsgroup.com

Affiliation: CSG

Subject: CSG Comments on LCFS 15-Day Changes

Comment:

See attached for CSG's comments on the 15-Day Changes. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/7288-lcfs2024-UjFVIARiVFhRNARr.pdf](http://www.arb.ca.gov/lists/com-attach/7288-lcfs2024-UjFVIARiVFhRNARr.pdf)

Original File Name: CSG Comments on LCFS 15-Day Changes.pdf

Date and Time Comment Was Submitted: 2024-08-21 13:06:05

No Duplicates.

**Comment 16 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Eduardo ("Eddie")

Last Name: Angeles

Email Address: eduardo.angeles@aa.com

Affiliation: American Airlines

Subject: Support for the Proposed LCFS Amendments

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/7290-lcfs2024-BnVVJgZ3VHcKYwh6.pdf](http://www.arb.ca.gov/lists/com-attach/7290-lcfs2024-BnVVJgZ3VHcKYwh6.pdf)

Original File Name: Support Ltr CARB LCFS Proposal.pdf

Date and Time Comment Was Submitted: 2024-08-21 16:54:08

No Duplicates.

**Comment 17 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Joey

Last Name: Airoso

Email Address: [communications@maasenergy.com](mailto:communications@maasenergy.com)

Affiliation:

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

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7292-lcfs2024-B2QFagFyWWIQOIM2.docx](http://www.arb.ca.gov/lists/com-attach/7292-lcfs2024-B2QFagFyWWIQOIM2.docx)

Original File Name: Circle A Dairy.docx

Date and Time Comment Was Submitted: 2024-08-23 07:34:41

41 Duplicates.



## **Comment 18 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Graham

Last Name: Noyes

Email Address: graham@noyeslawcorp.com

Affiliation: Noyes Law Corporation

Subject: 15-Day LCFS Comment by FS, Fueling Sustainability  
Comment:

Dear Clerk of the Board,

The following is a summary of the comment. The full comment is attached. Please contact me if there are any questions or issues with the filing.

FS Indústria de Biocombustíveis Ltda (FS, Fueling Sustainability) appreciates the opportunity to provide comments regarding the recent modifications proposed by the California Air Resources Board (CARB) to the Low Carbon Fuel Standard (LCFS) regulations (the "15-Day Changes"). We appreciate the California Air Resources Board's (CARB) role in developing and implementing the vitally important LCFS program. Aligned with CARB's LCFS and climate policy objectives, FS produces extremely low carbon intensity (Low-CI) ethanol and works to develop and implement technical innovations that can contribute to and be recognized in the LCFS and other carbon reduction programs. We are submitting these comments to share our perspective with CARB regarding proposals of particular importance to FS, and to share our direct experience in participating and complying with certification schemes.

Best Regards,

Graham Noyes for FS, Fueling Sustainability  
Noyes Law Corporation  
419 Broad Street, Suite E  
Nevada City, CA 95959  
www.fuelandcarbonlaw.com  
(530)264-7157 Direct  
graham@noyeslawcorp.com  
<https://www.linkedin.com/in/grahamnoyes>  
@Graham Noyes

Attachment: [www.arb.ca.gov/lists/com-attach/7300-lcfs2024-VDJWI1YIAj1SN1Qy.pdf](http://www.arb.ca.gov/lists/com-attach/7300-lcfs2024-VDJWI1YIAj1SN1Qy.pdf)

Original File Name: FS LCFS Comment 15 day Changes Final.pdf

Date and Time Comment Was Submitted: 2024-08-23 09:05:21

No Duplicates.

## **Comment 19 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Graham

Last Name: Noyes

Email Address: graham@noyeslawcorp.com

Affiliation: Noyes Law Corporation for Raizen

Subject: Raizen's Comments on Proposed 15-Day Changes

Comment:

Dear Clerk of the Board,

Attached please find Raizen's comments regarding the proposed 15-Day Changes to the Low Carbon Fuel Standard. Below is a brief summary of these comments. Please contact me regarding any questions or issues regarding the filing. Thank you for your assistance.

The recent modifications proposed by the California Air Resources Board (CARB) to the Low Carbon Fuel Standard (LCFS) regulations (the "15-Day Changes") present significant implications for biofuel producers globally. As one of the leading ethanol producers in Brazil, Raízen is deeply invested in the LCFS and broadly supports these changes, which will accelerate carbon intensity (CI) and petroleum reduction, phase in sustainability requirements, and promote advanced biofuels. From Raízen's standpoint, these changes resonate with our commitment to sustainability and innovation. These changes also have the potential to expand the global sustainable fuels market but to execute the revised LCFS effectively, it will be critical for CARB to work with stakeholders as CARB interprets and implements the sustainability and certification requirements.

Best Regards,

Graham Noyes for Raizen  
Noyes Law Corporation  
419 Broad Street, Suite E  
Nevada City, CA 95959  
www.fuelandcarbonlaw.com  
(530)264-7157 Direct  
graham@noyeslawcorp.com

Attachment: [www.arb.ca.gov/lists/com-attach/7305-lcfs2024-AXMAZwRsWHELaAhm.pdf](http://www.arb.ca.gov/lists/com-attach/7305-lcfs2024-AXMAZwRsWHELaAhm.pdf)

Original File Name: Raizen's Comments on 15 Day Changes FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-23 10:29:09

No Duplicates.

## **Comment 20 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Graham

Last Name: Noyes

Email Address: graham@noyeslawcorp.com

Affiliation: Noyes Law Corporation for H Cycle

Subject: H Cycle's Comments RE: 15-Day Changes to LCFS Proposal  
Comment:

Dear Clerk of the Board,

Attached please find the comments of H Cycle regarding the 15-day proposed changes to the Low Carbon Fuel Standard. A summary of the comments is included here. Please contact me if there are any questions or issues relating to the filing. Thank you for your assistance.

H Cycle, LLC ("H Cycle") is pleased to submit comments pertaining to the California Air Resources Board's ("CARB") proposed 15-day changes ("15-Day Changes") to the Low Carbon Fuel Standard ("LCFS"). 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 not to bias the LCFS program structure to favor more energy intensive electrolytic hydrogen over H Cycle's non-electrolytic process that leverages waste streams from organics diversion to reduce emissions of the short-lived climate pollutant ("SLCP") methane, create a distributed hydrogen production network, and attract federal dollars to California to accelerate hydrogen production expansion.

Best Regards,

Graham Noyes  
Noyes Law Corporation for H Cycle  
419 Broad Street, Suite E  
Nevada City, CA 95959  
www.fuelandcarbonlaw.com  
(530)264-7157 Direct  
graham@noyeslawcorp.com

Attachment: [www.arb.ca.gov/lists/com-attach/7306-lcfs2024-BW1RCABiUXsLbgJu.pdf](http://www.arb.ca.gov/lists/com-attach/7306-lcfs2024-BW1RCABiUXsLbgJu.pdf)

Original File Name: H Cycle LCFS Comment FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-23 10:49:00

No Duplicates.



**Comment 21 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Andrew

Last Name: Moore

Email Address: amoore@resacasun.com

Affiliation: Georgia/Florida Soybean Association

Subject: See attached comments from GA/FL Soybean Association on LCFS proposal

Comment:

See attached comments from GA/FL Soybean Association

Attachment: [www.arb.ca.gov/lists/com-attach/7333-lcfs2024-BmVVMgNwBDUFXAAX.pdf](http://www.arb.ca.gov/lists/com-attach/7333-lcfs2024-BmVVMgNwBDUFXAAX.pdf)

Original File Name: CARB 15 Day Comments State 8 26 24.pdf

Date and Time Comment Was Submitted: 2024-08-26 06:17:52

8 Duplicates.

**Comment 22 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Benjamin

Last Name: Kling

Email Address: bkling@betalabservices.com

Affiliation: Beta Analytic

Subject: CA LCFS 2024 Update Comment Beta Analytic

Comment:

Please see Beta Analytic's comments on the proposed update to California's LCFS attached below. We appreciate the opportunity to provide our feedback very much, thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/7335-lcfs2024-VTYBZlcJUG8BZAFn.pdf](http://www.arb.ca.gov/lists/com-attach/7335-lcfs2024-VTYBZlcJUG8BZAFn.pdf)

Original File Name: CA LCFS 2024 Update Comment Beta Analytic.pdf

Date and Time Comment Was Submitted: 2024-08-26 08:41:09

No Duplicates.

**Comment 23 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Jean

Last Name: Tepperman

Email Address: [action@sunflower-alliance.org](mailto:action@sunflower-alliance.org)

Affiliation: Sunflower Alliance

Subject: Proposed updates on the Low Carbon Fuel Standard

Comment:

See attachment

Attachment: [www.arb.ca.gov/lists/com-attach/7339-lcfs2024-UzBTOgBsUG4CYQBu.pdf](http://www.arb.ca.gov/lists/com-attach/7339-lcfs2024-UzBTOgBsUG4CYQBu.pdf)

Original File Name: comments on LCFS - 7339 - Sunflower Alliance.pdf

Date and Time Comment Was Submitted: 2024-08-26 10:15:25

No Duplicates.



**Comment 24 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Alessandra  
Last Name: Magnasco  
Email Address: alessandra@cfca.energy  
Affiliation: California Fuels & Convenience Alliance

Subject: CFCA - Opposition  
Comment:

Please see the attached opposition letter.

Attachment: [www.arb.ca.gov/lists/com-attach/7340-lcfs2024-VzRQMFc1AjBXDIQ7.pdf](http://www.arb.ca.gov/lists/com-attach/7340-lcfs2024-VzRQMFc1AjBXDIQ7.pdf)

Original File Name: CFCA Opposition - LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2024-08-26 10:22:24

No Duplicates.

**Comment 25 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Jeffrey

Last Name: Pekrul

Email Address: Jeffrey.Pekrul@messages.fwwatch.org

Affiliation:

Subject: Stop rewarding dirty factory farms

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/com-attach/7342-lcfs2024-WyhdLwZoUHNXDlcl.pdf](http://www.arb.ca.gov/lists/com-attach/7342-lcfs2024-WyhdLwZoUHNXDlcl.pdf)

Original File Name: Stop Rewarding Dirty Factory Farms.pdf

Date and Time Comment Was Submitted: 2024-08-26 11:03:35

770 Duplicates.

**Comment 26 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Gordon

Last Name: Russell

Email Address: GORDON.RUSSELL@ldc.com

Affiliation: LDC

Subject: Comments LCFS Amendments – 15-Day Changes

Comment:

Please See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/7343-lcfs2024-Am5RNANkWXIQCVAz.pdf](http://www.arb.ca.gov/lists/com-attach/7343-lcfs2024-Am5RNANkWXIQCVAz.pdf)

Original File Name: LCFS Comments LDC.pdf

Date and Time Comment Was Submitted: 2024-08-26 12:09:58

No Duplicates.

## **Comment 27 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Yaniv

Last Name: Scherson

Email Address: yaniv.scherson@anaergia.com

Affiliation: Anaergia

Subject: Food Scraps Definition and Landfill Capture Rate

Comment:

Two issues:

1. Landfill capture rate: still 75% (wrong figure according to multiple scientific studies, EPA and CA studies show 36% and Canadian Clean Fuel Program adopted the 36% figure to match science). Changing landfill capture rate of methane from 75% (1997 EPA incorrect number) to 36% (correct scientific number, EPA 2023, NASA/JPL Nature 2020, numerous other studies) properly values and appropriately incentivizes California food waste AD plants. The 75% is also dangerous because it sets incorrect standard and precedent for CI calculation in SB 1440. Canadian CFR has referenced the latest science and determined landfill capture rate of 36% (see slide 19 of presentation in this link: [https://drive.google.com/file/d/1OoJXYAsApJI7MDH4PyU1lGjWMLHKfonQ/view?usp=drive\\_link](https://drive.google.com/file/d/1OoJXYAsApJI7MDH4PyU1lGjWMLHKfonQ/view?usp=drive_link))

2. Food scraps: definition that is considered landfill diverted includes only post consumer food waste in solid form (only what's in trash cans). If food waste is in liquid form, doesn't count (ketchup or salad dressing or soda that goes to landfill). If food waste comes from a distribution center or food manufacturing facility, doesn't count, even though this waste goes to landfill. All food waste regardless of source should be assigned the statewide average of total fraction that goes to landfill. We should not cherry pick sources that are all in or all out of landfill destiny, particularly since all food waste is regulated by SB 1383 regardless of source. The attached document has suggested redlines on the definition to conform with SB 1383 and treat all food waste the same with a suggestion to simply revise the statewide fraction of food waste landfilled that should be adjusted to account for those sources that have lower landfiling rates than those sources that have higher landfiling rates. Now it's binary, either landfilled 97.5% or not at all and this is not reality.

Attachment: [www.arb.ca.gov/lists/com-attach/7344-lcfs2024-VzYGBllYBzELfwZh.docx](http://www.arb.ca.gov/lists/com-attach/7344-lcfs2024-VzYGBllYBzELfwZh.docx)

Original File Name: Anaergia Food Scraps Definition Adjustment.docx

Date and Time Comment Was Submitted: 2024-08-26 12:05:49

No Duplicates.

**Comment 28 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Jennifer

Last Name: LeRow

Email Address: jlerow@brayafuels.com

Affiliation: Braya Renewable Fuels

Subject: Braya Comments on CARB's Proposed LCFS Amendments Updated 08/12/2024  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7345-lcfs2024-BmQCdlIyACoAZ1UK.pdf](http://www.arb.ca.gov/lists/com-attach/7345-lcfs2024-BmQCdlIyACoAZ1UK.pdf)

Original File Name: Braya Comments on CARB's Proposed LCFS Amendments Updated  
08.12.2024.pdf

Date and Time Comment Was Submitted: 2024-08-26 12:52:08

No Duplicates.

**Comment 29 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Zachary

Last Name: Kahn

Email Address: zkahn@tesla.com

Affiliation: Tesla

Subject: Tesla Comments on CARB's Proposed 15-Day Amendments to the Low Carbon Fuel Standard

Comment:

Please see attached comments from Tesla on CARB's 15-Day Amendments to the LCFS Regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/7346-lcfs2024-UiZQM1UnV2gKbQBf.pdf](http://www.arb.ca.gov/lists/com-attach/7346-lcfs2024-UiZQM1UnV2gKbQBf.pdf)

Original File Name: Tesla LCFS 15 Day Amendments Final Comments.pdf

Date and Time Comment Was Submitted: 2024-08-26 13:07:51

No Duplicates.

**Comment 30 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Hilary

Last Name: Primack

Email Address: hprimack@mahoneyes.com

Affiliation:

Subject: Mahoney Environmental Comments on August 2024 15-day Package

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/7347-lcfs2024-VjtXMFI7VWkHbwNm.pdf](http://www.arb.ca.gov/lists/com-attach/7347-lcfs2024-VjtXMFI7VWkHbwNm.pdf)

Original File Name: Mahoney Environmental Comments on August 2024 15-day Package.pdf

Date and Time Comment Was Submitted: 2024-08-26 13:45:08

No Duplicates.



**Comment 31 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Laura

Last Name: Verduzco Flores

Email Address: laurav@chevron.com

Affiliation: Chevron

Subject: Comments on the LCFS calculators released in August 2024

Comment:

Please refer to the attachment

Attachment: [www.arb.ca.gov/lists/com-attach/7348-lcfs2024-AGEBcgFnA2IEMldl.pdf](http://www.arb.ca.gov/lists/com-attach/7348-lcfs2024-AGEBcgFnA2IEMldl.pdf)

Original File Name: Aug2024 Comments on LCFS Calculators.pdf

Date and Time Comment Was Submitted: 2024-08-26 14:08:41

No Duplicates.

**Comment 32 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Kevin

Last Name: Deinert

Email Address: kdeinert@sdsoybean.org

Affiliation:

Subject: CARB LCFS Comments

Comment:

See the attached PDF document with comments from the South Dakota  
Soybean Association.

Attachment: [www.arb.ca.gov/lists/com-attach/7349-lcfs2024-ATNXYVdkUjVQewk5.pdf](http://www.arb.ca.gov/lists/com-attach/7349-lcfs2024-ATNXYVdkUjVQewk5.pdf)

Original File Name: 2024-08-26 California Air Resources Board.pdf

Date and Time Comment Was Submitted: 2024-08-26 14:21:04

No Duplicates.

**Comment 33 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Shelby

Last Name: Neal

Email Address: shelby.neal@darlingii.com

Affiliation: Darling Ingredients

Subject: Comments on 15-day changes

Comment:

Thank you to CARB staff for their continued work on this issue and for considering our comments.

Sincerely,

Shelby Neal

VP - Renewables & Energy Policy

Attachment: [www.arb.ca.gov/lists/com-attach/7350-lcfs2024-VDACZVckAzxRPIQ6.pdf](http://www.arb.ca.gov/lists/com-attach/7350-lcfs2024-VDACZVckAzxRPIQ6.pdf)

Original File Name: Darling Final Comments on 15-Day Change 8-26-2024.pdf

Date and Time Comment Was Submitted: 2024-08-26 14:37:24

No Duplicates.

**Comment 34 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Amy

Last Name: Lilly

Email Address: amy.lilly@mercedes-benz.com

Affiliation:

Subject: Comments on LCFS 15-Day Notice

Comment:

Attached are comments from Mercedes-Benz on CARB's LCFS 15-day notice.

Attachment: [www.arb.ca.gov/lists/com-attach/7351-lcfs2024-Uj9RNVULBDtXMgRi.pdf](http://www.arb.ca.gov/lists/com-attach/7351-lcfs2024-Uj9RNVULBDtXMgRi.pdf)

Original File Name: MB LCFS 15 Day Comments.pdf

Date and Time Comment Was Submitted: 2024-08-26 14:42:37

No Duplicates.

**Comment 35 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Michael

Last Name: Smith

Email Address: mike.smith@xealenergy.com

Affiliation:

Subject: Xeal Energy Comments on Proposed 15-Day Changes

Comment:

Comment letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7352-lcfs2024-UTIBZlMgUGEDWgdr.pdf](http://www.arb.ca.gov/lists/com-attach/7352-lcfs2024-UTIBZlMgUGEDWgdr.pdf)

Original File Name: CARB LCFS 15day Comment Letter\_Xeal\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-26 15:04:56

No Duplicates.

## **Comment 36 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Christopher

Last Name: Malone

Email Address: robin@lcfcoalition.com

Affiliation: Low Carbon Fuel Coalition

Subject: Comments on 15 Day Package

Comment:

See attached letter for comments from the Low Carbon Fuels Coalition, signed by:

- 3Degrees
- Adelante
- Bayer
- California Advanced Biofuels Alliance
- Clean Future
- Clean Fuels Alliance America
- Eco Engineers
- Gevo
- The Great Plains Institute
- Green Plains
- Indigo Ag
- Life Cycle Associates
- Neste
- Novozymes / Novonosis
- NXT Clean Fuels
- SHV Energy
- Solutions from the Land
- World Energy

Attachment: [www.arb.ca.gov/lists/com-attach/7353-lcfs2024-WzdWMwZhAzNVDAdk.pdf](http://www.arb.ca.gov/lists/com-attach/7353-lcfs2024-WzdWMwZhAzNVDAdk.pdf)

Original File Name: LCFC CSA committee letter to CARB - 22Aug24.pdf

Date and Time Comment Was Submitted: 2024-08-26 15:05:46

No Duplicates.

**Comment 37 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Christy

Last Name: Seyfert

Email Address: cseyfert@soy.org

Affiliation: American Soybean Association

Subject: Comments from the American Soybean Association

Comment:

See attached comments from the American Soybean Association.

Attachment: [www.arb.ca.gov/lists/com-attach/7354-lcfs2024-AmNTJllyBwtWPFQ3.pdf](http://www.arb.ca.gov/lists/com-attach/7354-lcfs2024-AmNTJllyBwtWPFQ3.pdf)

Original File Name: ASA LCFS 15 Day Comments 8 26 24.pdf

Date and Time Comment Was Submitted: 2024-08-26 15:26:23

No Duplicates.

**Comment 38 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Victoria

Last Name: Bogdan Tejada

Email Address: vbogdantejada@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Organizational LCFS Comments

Comment:

The Center for Biological Diversity submits the attached comments on the California Air Resources Board's (CARB) proposed August 12, 2024 amendments to the Low Carbon Fuel Standard (LCFS). Please note that we are submitting the references cited for CARB's convenience. Those references are available here:  
<https://diversity.box.com/s/8jcli9f2vwyof9cbq1qx5sna1m0d0hsb>.

Attachment: [www.arb.ca.gov/lists/com-attach/7355-lcfs2024-WmgGNF1yBGdVawMt.pdf](http://www.arb.ca.gov/lists/com-attach/7355-lcfs2024-WmgGNF1yBGdVawMt.pdf)

Original File Name: 24.08.26 Ctr Biol Div Comments LCFS Aug2024 Amends FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-26 15:31:55

No Duplicates.



**Comment 39 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Bradley

Last Name: Parvin

Email Address: Bradpar70@aol.com

Affiliation:

Subject: CARB

Comment:

Keep putting small business out of business with your regulations then wonder why owners and consumers who don't want to pay for the associated additional costs are leaving California. Idiot Democrats and their socialist climate agenda raising costs for Californians and all Americans.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-26 16:15:39

No Duplicates.

**Comment 40 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: John

Last Name: Andersen

Email Address: jandersen@mendoco.com

Affiliation: Humboldt and Mendocino Redwood Companies

Subject: LCFS Amendments - HRC/MRC Comments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7357-lcfs2024-WjZSNwR2ADUGX1My.pdf](http://www.arb.ca.gov/lists/com-attach/7357-lcfs2024-WjZSNwR2ADUGX1My.pdf)

Original File Name: LCSF Amendments Comment\_HRC\_MRC.pdf

Date and Time Comment Was Submitted: 2024-08-26 16:33:55

No Duplicates.

**Comment 41 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Dan

Last Name: Evans

Email Address: Dan@promusenergy.com

Affiliation: Promus Energy

Subject: Comments on Proposed Low Carbon Fuel Standard 15-Day Changes

Comment:

Please see comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7359-lcfs2024-BXVTJwNtBTsBcgFy.pdf](http://www.arb.ca.gov/lists/com-attach/7359-lcfs2024-BXVTJwNtBTsBcgFy.pdf)

Original File Name: Promus Energy Comments on the Proposed Low Carbon Fuel Standard Amendments 8.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-26 16:59:18

No Duplicates.

**Comment 42 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Don

Last Name: Gilstrap

Email Address: dgilstrap@chevron.com

Affiliation:

Subject: Chevron comments on August 2024 15-day package

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7360-lcfs2024-VTYFawZiAyYDdwlm.pdf](http://www.arb.ca.gov/lists/com-attach/7360-lcfs2024-VTYFawZiAyYDdwlm.pdf)

Original File Name: Chevron Comments on 08-2024 15-Day Package.pdf

Date and Time Comment Was Submitted: 2024-08-26 17:09:56

No Duplicates.

**Comment 43 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Shane

Last Name: Snow

Email Address: advocacy-noreply@mg.gospringboard.io

Affiliation:

Subject: Stop Dirty Factory Farm Gas in the LCFS

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/com-attach/7361-lcfs2024-ViUBc1A+VXYKUwBk.pdf](http://www.arb.ca.gov/lists/com-attach/7361-lcfs2024-ViUBc1A+VXYKUwBk.pdf)

Original File Name: Stop Dirty Factory Farm Gas in the LCFS.pdf

Date and Time Comment Was Submitted: 2024-08-26 18:11:44

3 Duplicates.

**Comment 44 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Peter

Last Name: De Gregorio

Email Address: friendman1@prodigy.net

Affiliation: Climate Reality, Monterey Chapter

Subject: Carbon Tax

Comment:

Large Carbon emitters should be buying non-carbon energy credits rather Biofuel which carbon polluting fuel. It should help low income people to electrify the homes, add solar on their homes and purchase EVs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-26 20:31:18

No Duplicates.

**Comment 45 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Andy

Last Name: Foster

Email Address: andy.foster@aemetis.com

Affiliation: Aemetis, Inc.

Subject: Aemetis, Inc. Comments on Proposed 15-day Rule (LCFS)

Comment:

Please find attached comments from Aemetis, Inc. in response to the August 12, 2024, Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information for the Proposed Low Carbon Fuel Standard (LCFS) Amendments (15-Day Package).

Attachment: [www.arb.ca.gov/lists/com-attach/7363-lcfs2024-AGMFYgR3BTQLUgBw.pdf](http://www.arb.ca.gov/lists/com-attach/7363-lcfs2024-AGMFYgR3BTQLUgBw.pdf)

Original File Name: CARB\_Proposed 15-day Rule\_Aemetis Comments\_F08262024.pdf

Date and Time Comment Was Submitted: 2024-08-26 20:55:23

No Duplicates.

**Comment 46 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Shannon

Last Name: Broome

Email Address: sbroome@huntonak.com

Affiliation: on behalf of HIF USA

Subject: Comments of Highly Innovative Fuels USA

Comment:

Please find attached comments of HIF USA. Please contact me if you have any difficulty opening the file or if you have any questions regarding these comments.

Shannon S. Broome

Attachment: [www.arb.ca.gov/lists/com-attach/7364-lcfs2024-WmgHMOVxvUjUDKAU1.pdf](http://www.arb.ca.gov/lists/com-attach/7364-lcfs2024-WmgHMOVxvUjUDKAU1.pdf)

Original File Name: 2024-08-26 - HIF USA Comments on CARB LCFS August 2024 15-Day Notice.pdf

Date and Time Comment Was Submitted: 2024-08-26 22:44:45

No Duplicates.



## **Comment 47 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Mark

Last Name: Mobley

Email Address: markmobley722@gmail.com

Affiliation: 2016 Mirai owner

Subject: Proposed Low Carbon Fuel Standard Amendments

Comment:

Thank you for the opportunity to comment. The car loan for my 2016 Mirai is paid off, and I am the first owner. As a retiree on a fixed income and a Californian who cares about my carbon footprint, I'm asking CARB to preserve the HRI provisions unchanged. FCEV drivers have borne the cost for the reduced value of carbon credits. Many have gone back to gasoline fueled options because of the cost. It is much more expensive buying H2 now than it was when the credits were valued at \$100 - \$150/MTCO2. Elimination of the HRI program jeopardizes the fragile business model needed to maintain and expand the LIGHT DUTY H2 infrastructure that I absolutely depend on, unless I dip into my savings to purchase or lease another car. I love my zero emissions Mirai and the redundant infrastructure I enjoy in Orange County. It's more expensive than gasoline, but as a retiree, its one way I can reduce my carbon footprint. I need the Board to allow me to continue doing just that. Thank you, Mark Mobley

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-27 03:33:02

No Duplicates.

**Comment 48 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Chelsey

Last Name: Robinson

Email Address: Chelsey.Robinson@bayer.com

Affiliation:

Subject: CARB 15-Day Package Comments 2024

Comment:

Thank you to CARB staff for their continued work on this issue and for considering our comments. Please find the attached comments and reach out to me if you have any questions.

Sincerely,  
Chelsey Robinson  
Bayer Crop Science

Attachment: [www.arb.ca.gov/lists/com-attach/7366-lcfs2024-BWZVMlAjBTQAZwJ3.pdf](http://www.arb.ca.gov/lists/com-attach/7366-lcfs2024-BWZVMlAjBTQAZwJ3.pdf)

Original File Name: CARBAugust2024.docx.pdf

Date and Time Comment Was Submitted: 2024-08-27 04:46:38

No Duplicates.

**Comment 49 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Kari

Last Name: Buitenhoff

Email Address: kbuitenhoff@christiansoncpa.com

Affiliation: Christianson PLLP

Subject: Christianson PLLP comments - 15-day changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7367-lcfs2024-VzQAblYIV20BdFUh.pdf](http://www.arb.ca.gov/lists/com-attach/7367-lcfs2024-VzQAblYIV20BdFUh.pdf)

Original File Name: Christianson PLLP comments, LCFS 15-day notice 8.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 06:26:20

No Duplicates.

**Comment 50 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Helen

Last Name: Kemp

Email Address: hkemp@3degreesinc.com

Affiliation: 3Degrees Group Inc.

Subject: 3Degrees Comments on LCFS 15-Day

Comment:

Thank you for your consideration of our attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/7368-lcfs2024-UWIAylw4BTEEcAVg.pdf](http://www.arb.ca.gov/lists/com-attach/7368-lcfs2024-UWIAylw4BTEEcAVg.pdf)

Original File Name: 3Degrees Comments on LCFS Formal Rulemaking - 15 Day (August 2024).pdf

Date and Time Comment Was Submitted: 2024-08-27 06:54:05

1 Duplicates.

**Comment 51 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Amanda

Last Name: Myers Wisser

Email Address: amanda.myers.wisser@weavegrid.com

Affiliation: Weave Grid, Inc.

Subject: WeaveGrid Comments on LCFS Proposed 15-Day Changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7369-lcfs2024-BXICYVQ0U3YGZQhv.pdf](http://www.arb.ca.gov/lists/com-attach/7369-lcfs2024-BXICYVQ0U3YGZQhv.pdf)

Original File Name: WeaveGrid\_Proposed LCFS Amendments V2\_final.pdf

Date and Time Comment Was Submitted: 2024-08-27 07:16:30

No Duplicates.

**Comment 52 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

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). 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 which were made publicly available on August 12, 2024.

Attachment: [www.arb.ca.gov/lists/com-attach/7370-lcfs2024-VWdWZFRIUjlSZgk+.pdf](http://www.arb.ca.gov/lists/com-attach/7370-lcfs2024-VWdWZFRIUjlSZgk+.pdf)

Original File Name: 240827 -Newtrient-LCFS-15-Day-Comments.pdf

Date and Time Comment Was Submitted: 2024-08-27 07:25:19

1 Duplicates.

**Comment 53 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: William

Last Name: Barksdale

Email Address: [william\\_barksdale@cargill.com](mailto:william_barksdale@cargill.com)

Affiliation: Cargill, Inc.

Subject: Comments on 15-day changes

Comment:

Cargill thanks CARB staff for the opportunity to comment, and for consideration of the attached.

Sincerely,

William Barksdale  
Managing Director

Attachment: [www.arb.ca.gov/lists/com-attach/7372-lcfs2024-VSEANVw4DtQIxm0D.pdf](http://www.arb.ca.gov/lists/com-attach/7372-lcfs2024-VSEANVw4DtQIxm0D.pdf)

Original File Name: Cargill LCFS Comments 15-day .pdf

Date and Time Comment Was Submitted: 2024-08-27 08:23:36

No Duplicates.

**Comment 54 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Gal  
Last Name: Sitty  
Email Address: galsitty@kiausa.com  
Affiliation: Kia Corporation

Subject: Kia comments on the proposed 15-Day Changes to LCFS Regulation  
Comment:

Please find the Kia Corporation's comments on the Proposed 15-Day  
Changes to the LCFS Regulation.

Thank you,

Gal Sitty

Senior Regulatory Compliance Manager  
Kia NA

Attachment: [www.arb.ca.gov/lists/com-attach/7373-lcfs2024-B2wGaVw8U18BZARr.pdf](http://www.arb.ca.gov/lists/com-attach/7373-lcfs2024-B2wGaVw8U18BZARr.pdf)

Original File Name: Kia Comments 15 Day Modification to LCFS Ammendments\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 08:33:23

No Duplicates.



**Comment 55 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Gregory

Last Name: Cane

Email Address: greg@h2tonps.org

Affiliation: California Hydrogen Car Owners Associati

Subject: Low Carbon Fuel Standard (LCFS) Comments

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/com-attach/7378-lcfs2024-BWkBc1UmBQkLYVQ3.pdf](http://www.arb.ca.gov/lists/com-attach/7378-lcfs2024-BWkBc1UmBQkLYVQ3.pdf)

Original File Name: Ltr LCFS Comment AU2724\_0842P.pdf

Date and Time Comment Was Submitted: 2024-08-27 08:59:28

No Duplicates.

**Comment 56 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: John

Last Name: Rauber

Email Address: rauberjohn@johndeere.com

Affiliation: Deere & Company

Subject: Proposed Modifications to Proposed LCFS Amendments (15-Day Changes) 8.12.24  
Comment:

Please find attached comments submitted by Deere & Company ("John Deere") to CARB's 8/12 Proposed Modifications to Proposed LCFS Amendments ("15-Day Changes").

Attachment: [www.arb.ca.gov/lists/com-attach/7379-lcfs2024-UTtdNANqUm9SCwBk.pdf](http://www.arb.ca.gov/lists/com-attach/7379-lcfs2024-UTtdNANqUm9SCwBk.pdf)

Original File Name: John Deere comments CARB LCFS 8.27.24 proposals.pdf

Date and Time Comment Was Submitted: 2024-08-27 08:58:37

No Duplicates.

**Comment 57 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Christiana  
Last Name: Darlington  
Email Address: [christiana@clereinc.net](mailto:christiana@clereinc.net)  
Affiliation: Placer Co Air Pollution control District

Subject: Biomass references  
Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/7380-lcfs2024-BWZVMgBzVGUEXVck.pdf](http://www.arb.ca.gov/lists/com-attach/7380-lcfs2024-BWZVMgBzVGUEXVck.pdf)

Original File Name: carb submittal 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 09:05:35

No Duplicates.

**Comment 58 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Robert

Last Name: Parkhurst

Email Address: [rparkhurst@sierravIEWSolutions.com](mailto:rparkhurst@sierravIEWSolutions.com)

Affiliation: Indigo Agriculture

Subject: IndigoAg comments on Proposed 15-day LCFS Changes

Comment:

Please see the attached letter providing feedback on the Proposed  
15-Day Changes to the Proposed LCFS Regulation Order.

Attachment: [www.arb.ca.gov/lists/com-attach/7383-lcfs2024-Bm8BaV04Bz1WNwhn.pdf](http://www.arb.ca.gov/lists/com-attach/7383-lcfs2024-Bm8BaV04Bz1WNwhn.pdf)

Original File Name: IndigoAg 15-day comment Letter on CARB LCFS.pdf

Date and Time Comment Was Submitted: 2024-08-27 09:35:30

No Duplicates.

**Comment 59 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Lisa

Last Name: Hanke

Email Address: lhanke@ecoengineers.us

Affiliation: EcoEngineers

Subject: Proposed Low Carbon Fuel Standard Amendments issued August 12, 2024

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7384-lcfs2024-VmdWZVZ6BTJVMgR9.pdf](http://www.arb.ca.gov/lists/com-attach/7384-lcfs2024-VmdWZVZ6BTJVMgR9.pdf)

Original File Name: 15-Day LCFS Amendments Comments EcoEngineers.pdf

Date and Time Comment Was Submitted: 2024-08-27 09:50:37

No Duplicates.

**Comment 60 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Kent

Last Name: Leacock

Email Address: kent.leacock@mainspringenergy.com

Affiliation:

Subject: Mainspring Energy Comments on Proposed LCFS Amendments

Comment:

See attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/7385-lcfs2024-UzBdOgFyUWAAWQNv.pdf](http://www.arb.ca.gov/lists/com-attach/7385-lcfs2024-UzBdOgFyUWAAWQNv.pdf)

Original File Name: CARB LCFS Letter\_Mainspring\_15 day amends\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 10:02:08

No Duplicates.

**Comment 61 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Tim

Last Name: Hellem

Email Address: tim.hellem@bbraunusa.com

Affiliation:

Subject: Proposed LCFS Changes

Comment:

Please see attached. Thanks

Attachment: [www.arb.ca.gov/lists/com-attach/7386-lcfs2024-VjoHYgFmBCQFXFVn.docx](http://www.arb.ca.gov/lists/com-attach/7386-lcfs2024-VjoHYgFmBCQFXFVn.docx)

Original File Name: LCFS 2024 DRAFT Amendment Comments 8-22-24.docx

Date and Time Comment Was Submitted: 2024-08-27 10:15:30

No Duplicates.

**Comment 62 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Jordan

Last Name: Garfinkle

Email Address: jordan.garfinkle@bloomenergy.com

Affiliation: Bloom Energy

Subject: Comments of Bloom Energy - Proposed 15-Day Changes, Low Carbon Fuel Standard  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7387-lcfs2024-U2JRYld7UWYHYFcu.pdf](http://www.arb.ca.gov/lists/com-attach/7387-lcfs2024-U2JRYld7UWYHYFcu.pdf)

Original File Name: 15-day Comments of Bloom Energy \_8.20.24\_combined.pdf

Date and Time Comment Was Submitted: 2024-08-27 10:25:53

No Duplicates.



**Comment 63 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Robert  
Last Name: Hambrecht  
Email Address: rhh@allotropepartners.com  
Affiliation: Allotrope Partners LLC

Subject: CARB LCFS Rulemaking Comment Letter  
Comment:

Please see our attached letter.

Thank you for the opportunity to participate in this process.

Attachment: [www.arb.ca.gov/lists/com-attach/7388-lcfs2024-BmUAZ1QnUGEHXgNv.pdf](http://www.arb.ca.gov/lists/com-attach/7388-lcfs2024-BmUAZ1QnUGEHXgNv.pdf)

Original File Name: CARB LCFS Rulemaking Letter Final August 27, 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 10:33:55

No Duplicates.

**Comment 64 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Nancy

Last Name: Young

Email Address: nyoung@gevo.com

Affiliation:

Subject: Gevo's Comments on the 15-Day Notice-LCFS

Comment:

Please see the attached comments. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/7389-lcfs2024-B2BRMlAnVWkBWFQ3.pdf](http://www.arb.ca.gov/lists/com-attach/7389-lcfs2024-B2BRMlAnVWkBWFQ3.pdf)

Original File Name: Gevo Comments - LCFS 15-Day Notice-8-27-24.pdf

Date and Time Comment Was Submitted: 2024-08-27 10:40:01

No Duplicates.

**Comment 65 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: James

Last Name: Duffy

Email Address: duffje@msn.com

Affiliation:

Subject: LCFS 15-Day Comments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7390-lcfs2024-VjJdLIUyAjdRLgNc.pdf](http://www.arb.ca.gov/lists/com-attach/7390-lcfs2024-VjJdLIUyAjdRLgNc.pdf)

Original File Name: Duffy\_LCFS\_15-Day\_Comments.pdf

Date and Time Comment Was Submitted: 2024-08-27 10:39:47

1 Duplicates.

## **Comment 66 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Sherrie

Last Name: Merrow

Email Address: smerrow@transportproject.org

Affiliation: The Transport Project

Subject: Comments on the August 2024 Proposed Changes to the LCFS

Comment:

Chair Randolph:

The Transport Project (TTP) respectfully submits the attached comments on the California Air Resources Board (CARB) staff proposed modifications to the California Low Carbon Fuel Standard (LCFS) program and in support of the objective, to continue to incentivize the lowest carbon fuels and technologies available to the transportation market. The LCFS modifications proposed by CARB staff are comprehensive and represent significant efforts that are appreciated. It is our belief that California should continue to be fuel neutral through the LCFS, using national standards and the Argonne GREET model to determine the best LCFS credit generators.

The Transport Project is a national coalition of fleets, vehicle and engine manufacturers and dealers, servicers and suppliers, and fuel producers and providers dedicated to the decarbonization of North America's transportation sector. Through the increased use of gaseous motor fuels including renewable natural gas and hydrogen, California can help achieve ambitious climate goals and greatly improve air quality safely, reliably, and effectively without delay and without compromising existing commercial business operations.

Thank you for your consideration of our comments and please let me know if you have any questions.

Sincerely,

Sherrie Merrow

The Transport Project Director of State Government Affairs

Attachment: [www.arb.ca.gov/lists/com-attach/7392-lcfs2024-UyddLwR1V1sAZQFu.pdf](http://www.arb.ca.gov/lists/com-attach/7392-lcfs2024-UyddLwR1V1sAZQFu.pdf)

Original File Name: TTP Comments on CA LCFS Staff Proposed Modifications - 8.27.2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 10:45:57

No Duplicates.

**Comment 67 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Sara

Last Name: Olsen

Email Address: [solsen@edf.org](mailto:solsen@edf.org)

Affiliation: Environmental Defense Fund

Subject: Environmental Defense Fund LCFS Comments

Comment:

Please find Environmental Defense Fund's comments regarding the  
15-day public notice for the proposed amendments to California's  
Low Carbon Fuel Standard

Attachment: [www.arb.ca.gov/lists/com-attach/7393-lcfs2024-VDgAZQRjAiIDWldm.pdf](http://www.arb.ca.gov/lists/com-attach/7393-lcfs2024-VDgAZQRjAiIDWldm.pdf)

Original File Name: LCFS 15-Day Package - EDF Comments.pdf

Date and Time Comment Was Submitted: 2024-08-27 10:54:56

No Duplicates.

## **Comment 68 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Christopher  
Last Name: Lish  
Email Address: lishchris@yahoo.com  
Affiliation:

Subject: Please further strengthen the Low Carbon Fuel Standard -- Notice of Public Availability of  
Comment:

Tuesday, August 27, 2024

Clerks' Office  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

Subject: Please further strengthen the Low Carbon Fuel Standard --  
Notice of Public Availability of Modified Text and Availability of  
Additional Documents and/or Information for the Proposed Low Carbon  
Fuel Standard Amendments

To Governor Gavin Newsom, CARB Chair Liane M. Randolph, and CARB  
Board Members:

I am deeply concerned about the current state of California's Low Carbon Fuel Standard (LCFS), the program that's supposed to incentivize transition to "low-carbon" transportation, and, therefore, am greatly appreciate that the California Air Resources Board has released a proposed update to the LCFS. Disappointingly, the revision doesn't go far enough. Despite persistent opposition from the environmental justice community, it continues those parts of the program that provide financial support for harmful practices, such as biofuel produced from virgin soy and canola oil, and factory farm production of "biomethane." I 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 industries, 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.

The proposal to remove credits for hydrogen produced from fossil fuels is a positive step. But delaying implementation of this measure until 2030 means production of hydrogen from fossil fuels will continue to receive financial rewards for another five-plus years, thus incentivizing the harm we should be preventing.

Biofuels produced from virgin soy or canola oil have major negative consequences, including deforestation, and incentivizing industrial

agriculture that generates large amounts of greenhouse gas and other pollution, and drives up food prices. The proposed revision acknowledges such problems, but continues to provide credits for the production of biofuels that include up to 20 percent from these destructive sources. And even this weak restraint will not take effect until 2028. Environmental justice advocates have repeatedly called instead for caps on vegetable-oil based biofuels.

The proposed draft continues to provide credits for industrial dairy "biogas," a false solution that has infected California's climate policies. This financial support continues to incentivize the expansion of large-scale factory dairy farms, causing serious harm to the health of surrounding communities, increasing the greenhouse gases and pollution generated by the production of feed for cows confined to barns; concentrated methane emitted by pools of waste; the inevitable leakage of methane during storage and transportation; and greenhouse gas emissions produced by combustion of the product. Incentivizing the buildout of dirty factory farms not only enables pollution but disproportionately harms 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. Collecting methane from factory farm cesspits does nothing to alleviate the massive harm mega-dairies and other large factory farms do to these communities. I strongly urge CARB to phase out support for biomethane as rapidly as possible.

Unlike previous versions of the LCFS, the new proposal does not require airlines to take any responsibility for the combustion of fossil jet fuel, even for intrastate travel. This is a step backward, excluding a major source of greenhouse gases and pollution from fossil fuel combustion.

Instead of doubling down on dirty factory farm gas, I demand a future free from the clutches of Big Oil and Big Ag and to prioritize Californians over corporate profits.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-27 10:59:15

No Duplicates.

**Comment 69 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Rhiannon

Last Name: Davis

Email Address: rhiannon.davis@electrifyamerica.com

Affiliation:

Subject: Electrify America comments on Proposed 15-Day Changes

Comment:

Please see attached letter. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/7395-lcfs2024-UTRSOFA0UWEGdFQm.pdf](http://www.arb.ca.gov/lists/com-attach/7395-lcfs2024-UTRSOFA0UWEGdFQm.pdf)

Original File Name: Electrify America LCFS 15-Day Comment final.pdf

Date and Time Comment Was Submitted: 2024-08-27 10:40:51

No Duplicates.



**Comment 70 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Amanda

Last Name: DeMarco

Email Address: amanda@csgcalifornia.com

Affiliation:

Subject: WRI comments on proposed 15 day changes

Comment:

Comment letter submitted on behalf of the World Resources  
Institute.

Attachment: [www.arb.ca.gov/lists/com-attach/7396-lcfs2024-BnFTJwdvU18HYlM8.pdf](http://www.arb.ca.gov/lists/com-attach/7396-lcfs2024-BnFTJwdvU18HYlM8.pdf)

Original File Name: WRI comments on the LCFS 15 Day Proposal.pdf

Date and Time Comment Was Submitted: 2024-08-27 11:02:57

No Duplicates.

**Comment 71 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 72 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Chris

Last Name: Wilson

Email Address: Chris.Wilson@Electrochaea.com

Affiliation: Electrochaea Corporation

Subject: LCFS 15-day Changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7398-lcfs2024-UTRdNwdjADBRI1Ig.pdf](http://www.arb.ca.gov/lists/com-attach/7398-lcfs2024-UTRdNwdjADBRI1Ig.pdf)

Original File Name: Electrochaea Comment LCFS 15-day.pdf

Date and Time Comment Was Submitted: 2024-08-27 11:09:59

No Duplicates.

**Comment 73 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Maria

Last Name: Pica

Email Address: maria.pica@adm.com

Affiliation: ADM

Subject: ADM comments on August 12 LCFS 15-day changes

Comment:

Attached, please find comments from ADM Senior Vice President of Ag Services & Oilseeds Greg Morris related to the subject matter above.

Attachment: [www.arb.ca.gov/lists/com-attach/7399-lcfs2024-AGFXNVY6BAhVMAVk.pdf](http://www.arb.ca.gov/lists/com-attach/7399-lcfs2024-AGFXNVY6BAhVMAVk.pdf)

Original File Name: ADM CA LCFS Comments 8-27-24.pdf

Date and Time Comment Was Submitted: 2024-08-27 11:12:00

No Duplicates.

**Comment 74 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Matt

Last Name: Miyasato

Email Address: matt.miyasato@firstelementfuel.com

Affiliation: FirstElement Fuel

Subject: FirstElement Fuel comments on 15 day changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7400-lcfs2024-VjBQMwNkVVkFMIRh.pdf](http://www.arb.ca.gov/lists/com-attach/7400-lcfs2024-VjBQMwNkVVkFMIRh.pdf)

Original File Name: FEF 15 day comments.pdf

Date and Time Comment Was Submitted: 2024-08-27 11:21:29

No Duplicates.

## **Comment 75 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Steven

Last Name: Fenaroli

Email Address: sfenaroli@cbbf.com

Affiliation:

Subject: California Farm Bureau's Comments Relating to the Proposed Low Carbon Fuel Standard Amendm

Comment:

RE: California Farm Bureau's Comments Relating to the Proposed Low Carbon Fuel Standard Amendments

Dear Chair Randolph,

We appreciate this opportunity to provide feedback on the proposed amendments to the Low Carbon Fuel Standard.

California Farm Bureau (CAFB) is an innovative, service-based organization dedicated to being the foremost advocate, protecting the future and quality of life for all California farmers and ranchers. CAFB protects California's diverse farming and ranching legacy and enables the whole agriculture community to thrive. With over 29,000 members, CAFB is California's largest agricultural association.

California family farmers are community members and are committed to the health and wellbeing of their neighbors. Unlike other economic sectors, the products California's farmers produce are used and needed by all Californians. We take great exception to much of the anti-farming, and anti-science rhetoric being offered up at the workshop by representatives of the AB 32 Environmental Justice Advisory Committee and some public comments which are clearly attacks on the agriculture community.

Section 95481

CAFB supports the need to protect our forests. As such, we support language that defines forest biomass waste. However, the language that CARB has inserted in Section 95481 critically leaves out many or even most wildfire mitigation and forest restoration projects in California. That is because wildfire mitigation, forest restoration, and fuel removal to address bark beetle or other forest health issues generally includes some amount of merchantable residues. In addition, all forest biomass waste can be converted to wood pellets or biochar, which are "wood products," so the exclusion of biomass that can be converted into other wood products effectively excludes all forest biomass waste. Biochar is recognized and defined as an Auxiliary Soil and Plant Substance by the California Department of Food and Agriculture with benefits as a soil amendment. Biochar is primarily composed of carbon and can be used as a long-term carbon storage sink in soils. It contributes directly to carbon sequestration and efforts to mitigate climate change".

To ensure that LCFS eligible forest biomass waste is environmentally sustainable and protects forest health, CAFB

recommends the following edits to the definition:

"Forest Biomass Waste" means residues that are 1) removed for wildfire mitigation, forest restoration projects, or the protection of public safety, or 2) small-diameter, non-merchantable residues, limited to forest understory vegetation, ladder fuels, limbs, branches, and logs that do not meet regional minimum marketable standards for processing into wood products."

These changes will also make the definition of forest biomass waste consistent with the requirements of Section 95488.8(g)(1)(A)(3) which references wildfire mitigation, the need for defensible space (which often requires clearcutting), forest restoration, and threats to public safety or infrastructure.

#### Section 95482

Rather than outright eliminate credit generation for hydrogen produced using fossil gas as a feedstock, CARB would be better suited to incentivize non-fossil gas hydrogen at a higher level. We currently need all the hydrogen we can produce. Eliminating credits entirely from hydrogen from fossil gas does nothing to encourage and develop a hydrogen market.

Further, CAFB recommends that CARB not place a cap on crop-based fuels. We ought to be encouraging more native and homegrown fuel sources than limiting ourselves on a fuel source that we know is better and cleaner than diesel.

If CARB must place a cap on biofuels, we recommend the cap be based on science and available data and not just an arbitrary number. CARB's own research shows a negative impact by placing a cap on crop-based fuels. By doing this, we continue to send the signal that LCFS is a bridge fuel, while removing diesel from the system.

#### Section 95488.9(g)

CAFB is very concerned that section 95488.9(g), which was originally written to ensure the sustainability of crop-based fuels, has been expanded to cover all waste biomass and the sustainability certification requirements. CAFB supports efforts to reduce deforestation, however the requirements in this section are entirely inappropriate for agricultural or forest residues where the feedstock is a waste product, and the fuels producer has no control over the crop growing practices. Applying the same standards to agricultural or forest residues as to purpose grown crops does not make sense and will effectively close the door to fuels that could be produced from agricultural and forest residues.

#### Section 95490(a)

CAFB supports the use of CCSU to drive down carbon intensities and generate carbon negative emissions where possible. The proposed amendments, however, limit sequestration to geologic storage and limit the use of captured carbon to fuels production. These restrictions exclude the use of biochar, which can be a co-product of hydrogen, electricity or biofuels production from waste biomass.

Biochar can be used for carbon sequestration in soil or to reduce emissions from cows, livestock manure and compost. Biochar can also be used in the production of concrete, pavement, tires, ink and other products. And biochar can replace charcoal for water filtration and purification. These are all beneficial uses that either sequester carbon or displace fossil fuel and higher emitting alternatives. Excluding the use of biochar will harm the economics and viability of forest waste and agricultural waste to fuel

projects and contradicts the recommendations in the 2022 Climate Change Scoping Plan to increase the use of bioenergy with CCS (BECCS).

CAFB urges CARB to revise the definition of CCS in section 95490(a) as follows:

(a)(1) Alternative fuel producers, petroleum refineries, and oil producers that capture CO2 on-site, including at the location of the production of hydrogen used as an intermediate input, and geologically sequester CO2 geologically or in the form of biochar, either on-site or off-site.

CAFB urges CARB to revise the definition of CCS on page 8 as follows:

"Carbon capture and sequestration (CCS) project" means either 1) a project that captures CO2 by an eligible entity specified in section 95490(a) of this sub article, transports the captured CO2 to an injection site, and injects and permanently sequesters the captured CO2 pursuant to the Carbon Capture and Sequestration Protocol and as specified by section 95490 of this sub article, or 2) a project that captures carbon in the form of biochar during the conversion of waste biomass to fuels and that biochar is used in a manner that sequesters the carbon.

These changes will allow for the use of biochar to sequester or use carbon that is captured during gasification or pyrolysis of waste biomass.

Sincerely,

Steven Fenaroli  
Political Affairs Director, California Farm Bureau

Attachment: [www.arb.ca.gov/lists/com-attach/7401-lcfs2024-BmpWM1QzWXkEXQk5.pdf](http://www.arb.ca.gov/lists/com-attach/7401-lcfs2024-BmpWM1QzWXkEXQk5.pdf)

Original File Name: LCFS\_08272024\_CAFBcomments\_08722024.pdf

Date and Time Comment Was Submitted: 2024-08-27 11:26:10

No Duplicates.



**Comment 76 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: George

Last Name: Kivork

Email Address: george.kivork@jobyaviation.com

Affiliation: Joby Aviation

Subject: Joby Aviation Comments on the Low Carbon Fuel Standard's August 2024 15-Day  
Comment Period

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7402-lcfs2024-V2cGOAcoA2IGNwUr.docx](http://www.arb.ca.gov/lists/com-attach/7402-lcfs2024-V2cGOAcoA2IGNwUr.docx)

Original File Name: 08.27.2024\_Joby\_LCFS 15-Day Changes\_Final.docx

Date and Time Comment Was Submitted: 2024-08-27 11:19:31

No Duplicates.

**Comment 77 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Matthew

Last Name: Amick

Email Address: mamick@mosoy.org

Affiliation:

Subject: LCFS Comments

Comment:

See attached comments from Biodiesel Coalition of Missouri.

Attachment: [www.arb.ca.gov/lists/com-attach/7403-lcfs2024-VDYHYgZqWFQLbgFg.pdf](http://www.arb.ca.gov/lists/com-attach/7403-lcfs2024-VDYHYgZqWFQLbgFg.pdf)

Original File Name: BCM CARB 15 Day Comments 8-27-24.pdf

Date and Time Comment Was Submitted: 2024-08-27 11:41:19

No Duplicates.

**Comment 78 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Darin

Last Name: Johnson

Email Address: drew@mnsoybean.com

Affiliation: Minnesota Soybean Growers Association

Subject: Comments on California's Low Carbon Fuel Standard

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7404-lcfs2024-WjdWIwNIVGYGX1R5.pdf](http://www.arb.ca.gov/lists/com-attach/7404-lcfs2024-WjdWIwNIVGYGX1R5.pdf)

Original File Name: MSGA - CARB Comments Aug. 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 11:46:20

No Duplicates.

**Comment 79 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Marc

Last Name: Ventura

Email Address: marc.v.ventura@p66.com

Affiliation: Phillips 66 Company

Subject: 2024 LCFS Amendments - Comments to first "15-day" package

Comment:

Please see letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7405-lcfs2024-VydUZAM0VVIXMIAX.pdf](http://www.arb.ca.gov/lists/com-attach/7405-lcfs2024-VydUZAM0VVIXMIAX.pdf)

Original File Name: P66\_CA\_LCFS\_Comments\_2024\_08\_27.pdf

Date and Time Comment Was Submitted: 2024-08-27 11:56:06

No Duplicates.

**Comment 80 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Dan

Last Name: Bowerson

Email Address: Dbowerson@autosinnovate.org

Affiliation:

Subject: Auto Innovators Comments on LCFS 15-Day Notice

Comment:

Please find the attached comments from the Alliance for Automotive  
Innovation (Auto Innovators).

Attachment: [www.arb.ca.gov/lists/com-attach/7406-lcfs2024-AWBQI1AlWWVRCAIg.pdf](http://www.arb.ca.gov/lists/com-attach/7406-lcfs2024-AWBQI1AlWWVRCAIg.pdf)

Original File Name: Auto Innovators\_CARB LCFS 15-Day Notice\_V2 (8-27-2024) - 7397.pdf

Date and Time Comment Was Submitted: 2024-08-27 11:55:10

No Duplicates.

**Comment 81 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: David

Last Name: Edwards

Email Address: david.edwards@airliquide.com

Affiliation: Air Liquide

Subject: Comments on Proposed LCFS Amendments, August 12, 2024 15-Day Notice  
Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/com-attach/7407-lcfs2024-VmRVY1xvB2BSeVNj.pdf](http://www.arb.ca.gov/lists/com-attach/7407-lcfs2024-VmRVY1xvB2BSeVNj.pdf)

Original File Name: 2024-08-27 LCFS AL Letter.pdf

Date and Time Comment Was Submitted: 2024-08-27 12:04:36

No Duplicates.

**Comment 82 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: William

Last Name: Barksdale

Email Address: [william\\_barksdale@cargill.com](mailto:william_barksdale@cargill.com)

Affiliation:

Subject: Comments on 15-day changes

Comment:

Cargill thanks CARB staff for the opportunity to comment, and for consideration of the attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7408-lcfs2024-UjEAZwZ1ADRXOAll.pdf](http://www.arb.ca.gov/lists/com-attach/7408-lcfs2024-UjEAZwZ1ADRXOAll.pdf)

Original File Name: Cargill LCFS Comments 15-day.pdf

Date and Time Comment Was Submitted: 2024-08-27 12:06:58

No Duplicates.

**Comment 83 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Renee

Last Name: Sharp

Email Address: rsharp@nrdc.org

Affiliation: NRDC

Subject: LCFS comments from 29 organizations: waste incineration

Comment:

The Natural Resources Defense Council and 28 signatory organizations submit the attached comments both in support of a critical change made to the latest draft of the proposed Low Carbon Fuel Standard (LCFS) regulations, as well as to urge the California Air Resources Board (CARB) to make further changes to the LCFS program to prevent harm to vulnerable communities related to waste incineration.

Attachment: [www.arb.ca.gov/lists/com-attach/7409-lcfs2024-BWkGYwRjAiIEXQJh.pdf](http://www.arb.ca.gov/lists/com-attach/7409-lcfs2024-BWkGYwRjAiIEXQJh.pdf)

Original File Name: LCFS comments August 2024 FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 12:05:27

No Duplicates.



**Comment 84 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Matt  
Last Name: Bright  
Email Address: mbright@carboncapture.com  
Affiliation: CarbonCapture Inc.

Subject: Proposed Amendments to the LCFS Regulation for Direct Air Capture  
Comment:

Dear Air Resources Board,

The undersigned Direct Air Capture (DAC) Coalition and leading DAC companies are grateful for this opportunity to comment on the proposed book-and-claim accounting regulations for low-carbon intensity (CI) electricity for DAC.

Respectfully,

Direct Air Capture Coalition  
CarbonCapture Inc.  
Heirloom Carbon Technologies  
Climeworks Corporation  
1PointFive

Attachment: [www.arb.ca.gov/lists/com-attach/7410-lcfs2024-UT1RNFQzBSUGXwNn.pdf](http://www.arb.ca.gov/lists/com-attach/7410-lcfs2024-UT1RNFQzBSUGXwNn.pdf)

Original File Name: LCFS DAC Power Comment August 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 12:10:59

No Duplicates.

**Comment 85 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Tom

Last Name: Hance

Email Address: [thance@gordley.com](mailto:thance@gordley.com)

Affiliation: U.S. Canola Association

Subject: Low Carbon Fuel Standard Proposed Amendments

Comment:

Attached are comments from the U.S. Canola Association.

Attachment: [www.arb.ca.gov/lists/com-attach/7411-lcfs2024-VyJcKVc1UmAEXVV4.pdf](http://www.arb.ca.gov/lists/com-attach/7411-lcfs2024-VyJcKVc1UmAEXVV4.pdf)

Original File Name: USCA - CARB - LCFS Proposed Amendments - Comments - 2024  
Aug.pdf

Date and Time Comment Was Submitted: 2024-08-27 12:16:19

No Duplicates.

**Comment 86 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: R

Last Name: Huggins

Email Address: rhuggins@pinespire.com

Affiliation: PineSpire

Subject: Comments on Lift Trucks in LCFS proposal

Comment:

Please see attached comments

Attachment: [www.arb.ca.gov/lists/com-attach/7412-lcfs2024-UyNQPwRrUGZXIgV1.pdf](http://www.arb.ca.gov/lists/com-attach/7412-lcfs2024-UyNQPwRrUGZXIgV1.pdf)

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

Date and Time Comment Was Submitted: 2024-08-27 12:15:15

No Duplicates.

**Comment 87 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Michael

Last Name: Harrison

Email Address: Michael.Harrison@valero.com

Affiliation:

Subject: Valero Renewable Fuels Company, LLC Comments on 15-Day Low Carbon Fuel  
Standard Amendments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7414-lcfs2024-UScBZlwxWG5WIgdo.pdf](http://www.arb.ca.gov/lists/com-attach/7414-lcfs2024-UScBZlwxWG5WIgdo.pdf)

Original File Name: Valero Renewable Fuels LCFS Comments with attachments-  
Final8.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 12:16:35

No Duplicates.

**Comment 88 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: David

Last Name: Bonelli

Email Address: dmbonelli@venable.com

Affiliation:

Subject: Powering America's Commercial Transportation Comments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7415-lcfs2024-VCRXMARmWX4FXAJh.pdf](http://www.arb.ca.gov/lists/com-attach/7415-lcfs2024-VCRXMARmWX4FXAJh.pdf)

Original File Name: PACT Comments on CARB LCFS 15-Day.pdf

Date and Time Comment Was Submitted: 2024-08-27 12:33:30

No Duplicates.

## **Comment 89 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Ethan

Last Name: Elkind

Email Address: elkind@berkeley.edu

Affiliation:

Subject: Obligating jet fuel in the LCFS does not necessarily risk federal preemption  
Comment:

These new proposed amendments no longer obligate jet fuel as part of the low carbon fuel standard, a change from the original proposal to include jet fuel burned in flights that take off and land in California.

A subtext of this decision is that there is a risk of litigation due to possible federal preemption. As I blogged yesterday on Legal Planet (<https://legal-planet.org/2024/08/26/california-pulls-back-on-sustainable-aviation-fuels/>), the airline industry has asserted that California is wholly preempted by various federal laws from mandating any sort of decarbonization of jet fuel.

But the industry overstates the risk of preemption, as a forthcoming CLEE legal analysis will document. There are three federal statutes at issue when it comes to aviation and federal preemption, which our report will detail. Despite their existence, California still has runway (ahem) to regulate jet fuel.

First, the Clean Air Act governs regulation of airplane engines and associated emissions. But in this case, California would not require airlines to change their engines or meet specific emissions standards. Instead, the low carbon fuel standard solely regulates the fuels as inputs. And when low-carbon biofuels blend with fossil jet fuel (the most common type of sustainable aviation fuel), no engine modifications are necessarily required.

Second, the Airline Deregulation Act prevents states and local governments from interfering with the national aviation market, if they take action "related to" prices, routes and services. A mandate for blending lower-carbon fuels into fossil jet is on its face not "related" to these specific economic features of a national aviation market. But if the fuels requirement became stringent enough to significantly affect the prices consumers pay or where airlines schedule refueling or routes, there is likely an outer limit to what California can require on fuels without risking preemption. As a result, the board would need to craft the regulation carefully to avoid these significant impacts.

Finally, the Federal Aviation Act could preempt state laws on jet fuel if the agency set forth national requirements for low-carbon jet fuel, but to date it has not yet finalized any such rule. And in that absence, California has leeway to regulate.

(And if the concern relates to a separate potential challenge based on the "dormant" commerce clause of the U.S. constitution, where state action creates an unjustified and significant barrier to free trade among states, such a challenge to the low carbon fuel standard program was already rejected by the Ninth Circuit in 2019, with the US Supreme Court declining to review.)

The Air Resources Board's recent change in policy matters because aviation is arguably the hardest-to-decarbonize sector in our economy, and policy could help jumpstart solutions. No single technology otherwise currently exists to cover all of our aviation needs in the long term, despite progress on batteries, hydrogen, and potentially "e-fuels," which combine captured carbon with zero-emission hydrogen to create a synthetic, carbon-neutral fuel that can combust in current engines just like fossil fuel.

So in the short run, the Air Resources Board has an opportunity to require airlines to blend in more low-carbon biofuels with fossil jet fuel, lowering the carbon content while sending a clear policy signal to the industry that research and investment must begin now on these longer-term solutions. This is what Governor Newsom required when he directed the Board in 2022 to "adopt an aggressive 20% clean fuels target for the aviation sector."

With its low carbon fuel standard, California is well positioned not just to offer more carrots to the airline industry to achieve these targets, but an actual stick to ensure compliance. At the same time, a legal pathway to achieve this goal and avoid preemption remains open, as our forthcoming report will discuss in more detail. Instead, by reversing course with this decision, the state now risks a delayed departure when it comes to more sustainable air travel.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-27 12:51:20

No Duplicates.

**Comment 90 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Allen

Last Name: Schaeffer

Email Address: [aschaeffer@enginetechnforum.org](mailto:aschaeffer@enginetechnforum.org)

Affiliation:

Subject: Engine Tech Forum Comments to CARB on 15 day amendments LCFS

Comment:

Thank you for considering the attached comments regarding the 15  
Day Amendments to the LCFS

Attachment: [www.arb.ca.gov/lists/com-attach/7417-lcfs2024-VzJVPQNIWWMEbFI3.pdf](http://www.arb.ca.gov/lists/com-attach/7417-lcfs2024-VzJVPQNIWWMEbFI3.pdf)

Original File Name: Engine Tech Forum \_ CARB LCFS comments Aug 272024.pdf

Date and Time Comment Was Submitted: 2024-08-27 13:08:00

No Duplicates.



**Comment 91 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Matt

Last Name: Dias

Email Address: mattd@calforests.org

Affiliation:

Subject: RE: 15 Day Comment letter - LCFS 2024

Comment:

To whom it may concern,

Please see uploaded comment letter submitted on behalf of concerned organizations, including representatives of landowners, professional foresters, Resource Conservation Districts, energy innovators, and Counties. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/7418-lcfs2024-AjAHNQMyVzwFMQcw.pdf](http://www.arb.ca.gov/lists/com-attach/7418-lcfs2024-AjAHNQMyVzwFMQcw.pdf)

Original File Name: 240827 LCFS 15\_Day Comment FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 13:06:38

No Duplicates.

**Comment 92 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Rosalie

Last Name: Barcinas

Email Address: Rosalie.Barcinas@sce.com

Affiliation: SCE

Subject: SCE recommends amendments to the proposed LCFS 15-day changes.

Comment:

SCE supports the LCFS regulation, but requests edits to the Proposed 15-day changes to improve clarity, address operational challenges, and provide certainty to the market and utilities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-27 13:11:20

No Duplicates.

**Comment 93 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Margaret

Last Name: Campbell

Email Address: margaret.c.campbell@delta.com

Affiliation: Delta Air Lines

Subject: Comments on Proposed LCFS Amendments

Comment:

Attached please find comments from Delta Air Lines on the proposed LCFS amendments. Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/7420-lcfs2024-BmICYQBtVnECZVAP.pdf](http://www.arb.ca.gov/lists/com-attach/7420-lcfs2024-BmICYQBtVnECZVAP.pdf)

Original File Name: Delta Air Lines Comments on CARB LCFS Amendments August 27 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 13:07:24

No Duplicates.

**Comment 94 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Richard

Last Name: DeRose

Email Address: rderose@sjindustries.com

Affiliation:

Subject: Comment Letter

Comment:

Comments attached. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/7421-lcfs2024-WmsGNFZ6U2QLbAJ7.pdf](http://www.arb.ca.gov/lists/com-attach/7421-lcfs2024-WmsGNFZ6U2QLbAJ7.pdf)

Original File Name: 14-day Amendments Comment Letter 8.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 13:15:57

No Duplicates.

**Comment 95 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

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/7423-lcfs2024-UCNVMFE5ADZWPgh8.pdf](http://www.arb.ca.gov/lists/com-attach/7423-lcfs2024-UCNVMFE5ADZWPgh8.pdf)

Original File Name: Scientists letter on LCFS veg oil cap Aug 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 13:26:55

No Duplicates.

**Comment 96 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Devin

Last Name: Mogler

Email Address: devin.mogler@gpreinc.com

Affiliation: Green Plains Inc.

Subject: LCFS Amendment Comments

Comment:

Please see comments from Green Plains Inc., attached here.

Attachment: [www.arb.ca.gov/lists/com-attach/7424-lcfs2024-AGNdOlwvVWRSCwhr.pdf](http://www.arb.ca.gov/lists/com-attach/7424-lcfs2024-AGNdOlwvVWRSCwhr.pdf)

Original File Name: CARB Comments - 08272024-1.pdf

Date and Time Comment Was Submitted: 2024-08-27 13:29:02

1 Duplicates.

**Comment 97 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Elizabeth

Last Name: Bourbon

Email Address: elizabeth.bourbon@valero.com

Affiliation: Diamond Green Diesel LLC

Subject: Comments of Diamond Green Diesel LLC

Comment:

Attached please find comments submitted on behalf of Diamond Green Diesel, LLC regarding the 15-day package for the proposed amendments to the LCFS regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/7426-lcfs2024-AmZQPwZmAjxQOQln.pdf](http://www.arb.ca.gov/lists/com-attach/7426-lcfs2024-AmZQPwZmAjxQOQln.pdf)

Original File Name: Diamond Green Diesel - 15 day Package Comments 08 27 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 13:30:24

No Duplicates.

## **Comment 98 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Chris

Last Name: Gould

Email Address: Chris.Gould@CRC.com

Affiliation: Carbon TerraVault

Subject: Comments on the August 12, 2024 CARB Low Carbon Fuel Standard 15-Day Changes  
Comment:

Carbon TerraVault Holdings, LLC ("CTV") appreciates the opportunity to comment on the California Air Resources Board's ("CARB" or "the Board") proposed amendments to the Low Carbon Fuel Standard ("LCFS"), released on August 12, 2024 (the "15-Day Changes").

CTV believes that the proposed modifications to LCFS credit generation for hydrogen projects is inconsistent with the requirements of California's Administrative Procedure Act ("APA") as well as CARB's December 2022 Scoping Plan (the "2022 Scoping Plan"). CARB must not finalize the 15-Day Changes or CARB risks suppressing California's nascent low-carbon hydrogen industry in a manner that will inevitably increase the risk of stranding existing assets and projects.

Restricting LCFS credits to non-fossil hydrogen after 2031:

- Does not align with CARB's 2022 Scoping Plan;
- Inhibits economic incentives that will constrict supply and the California hydrogen sector;
- Ignores the State's technology-neutral approach to carbon reduction; and
- Sends a message to investors that California's regulatory agencies may arbitrarily change rules that negatively impact the investment landscape without notice laid out by the state's own legislation.

Please see the attached letter for details.

Attachment: [www.arb.ca.gov/lists/com-attach/7427-lcfs2024-BWZSIFIIUV1WPFc0.pdf](http://www.arb.ca.gov/lists/com-attach/7427-lcfs2024-BWZSIFIIUV1WPFc0.pdf)

Original File Name: CTV LCFS for Gas+CCS in Hydrogen Production - 15-Day Comment Letter 08272024.pdf

Date and Time Comment Was Submitted: 2024-08-27 13:28:44

No Duplicates.



**Comment 99 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Yuliya

Last Name: Shmidt

Email Address: yuliya.shmidt@bart.gov

Affiliation: BART

Subject: BART's comments on fixed guideway crediting

Comment:

BART supports the removal of the pre-2011/post-2010 delineation for Fixed Guideway System crediting thus recognizing that electric rail - no matter when it was constructed - significantly reduces Vehicle Miles Traveled (VMT) and emissions. BART also supports the efforts to strengthen the price of credits. The LCFS program provides a rare opportunity for public transit to be supported by polluting companies instead of California taxpayers.

Attachment: [www.arb.ca.gov/lists/com-attach/7428-lcfs2024-UDJWMQd0VXJRCAhr.docx](http://www.arb.ca.gov/lists/com-attach/7428-lcfs2024-UDJWMQd0VXJRCAhr.docx)

Original File Name: BART comments on LCFS amendments August 2024 final.docx

Date and Time Comment Was Submitted: 2024-08-27 13:40:07

No Duplicates.

**Comment 100 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Danielle

Last Name: Weizman

Email Address: dweizman@sdge.com

Affiliation: San Diego Gas & Electric Company

Subject: SDG&E Comments on Proposed LCFS Amendments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7429-lcfs2024-UzJUI1M1VHILfgN3.pdf](http://www.arb.ca.gov/lists/com-attach/7429-lcfs2024-UzJUI1M1VHILfgN3.pdf)

Original File Name: August 27 FINAL SDG&E 15-Day Comment Letter.pdf

Date and Time Comment Was Submitted: 2024-08-27 13:40:01

No Duplicates.

**Comment 101 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Steven

Last Name: Berry

Email Address: steven.berry@yale.edu

Affiliation: Princeton University

Subject: Comments of Berry and Searchinger on Renewal of LCFS

Comment:

Comments are in the attached file including additional documents as attachments.

Attachment: [www.arb.ca.gov/lists/com-attach/7431-lcfs2024-BmVWP1wwAz0DYFQ6.zip](http://www.arb.ca.gov/lists/com-attach/7431-lcfs2024-BmVWP1wwAz0DYFQ6.zip)

Original File Name: Comments of Berry & Searchinger on Renewal of LCFS & Attachments.zip

Date and Time Comment Was Submitted: 2024-08-27 13:41:44

No Duplicates.

**Comment 102 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Katie

Last Name: Muckenhirn

Email Address: kmuckenhirn@ethanol.org

Affiliation: American Coalition for Ethanol

Subject: ACE Comments on Additional LCFS Proposed Amendments Announced 8/12/24  
Comment:

On behalf of the American Coalition for Ethanol (ACE), please see comments attached from ACE CEO Brian Jennings in response to additional amendments proposed on August 12 by the California Air Resources Board (CARB) on the Low Carbon Fuel Standard (LCFS).

Best,  
Katie

Attachment: [www.arb.ca.gov/lists/com-attach/7432-lcfs2024-VjdVMFUxVloAZQBh.pdf](http://www.arb.ca.gov/lists/com-attach/7432-lcfs2024-VjdVMFUxVloAZQBh.pdf)

Original File Name: ACE Calif LCFS comments on August 12 amendment package 8.27.pdf

Date and Time Comment Was Submitted: 2024-08-27 13:04:51

No Duplicates.

**Comment 103 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Laura B  
Last Name: Renger  
Email Address: laura@caletc.com  
Affiliation: CalETC

Subject: Low Carbon Fuel Standard  
Comment:

Attached are the comments of the CalETC Board of Directors.

Attachment: [www.arb.ca.gov/lists/com-attach/7433-lcfs2024-UzBUMwZrVGiHdVc0.pdf](http://www.arb.ca.gov/lists/com-attach/7433-lcfs2024-UzBUMwZrVGiHdVc0.pdf)

Original File Name: CalETC comment letter on proposed LCFS 15-day change amendments  
Aug 27 final.pdf

Date and Time Comment Was Submitted: 2024-08-27 13:59:55

No Duplicates.

## **Comment 104 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Bruce

Last Name: Hata

Email Address: bruhabox-carb@yahoo.com

Affiliation:

Subject: LCFS Credits Affecting Light Duty Hydrogen Stations

Comment:

I am merely a fuel cell EV owner and, unfortunately, the technicalities of the LCFS rules are over my head. However, I do understand that the current regulations are the cause of the high prices at the light duty hydrogen stations as well as the pause/stoppage in the construction of new stations.

I have been one of the lucky few FCEV drivers over the past 6-1/2 years who have been able to ride the ups and downs of the hydrogen infrastructure. There were slow improvements and expansion being made, but it wasn't until the price of hydrogen increased did the sales of FCEVs start to drop as well as the stoppage of station construction. I am now very concerned that without changes to the LCFS regulations the expansion and improvements made since 2015 will all be for naught and light duty hydrogen stations will not survive.

Please do not throw away all the work of the past 10+ years. Please do not emphasize heavy duty stations over light duty stations as both are important. Please do not let bio-diesel or any other renewable carbon producing fuels overthrow the future of a truly clean fuel that is hydrogen.

Regards,  
Bruce Hata

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-27 13:41:02

No Duplicates.

**Comment 105 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Cristin

Last Name: Reno

Email Address: cristin.reno@oberonfuels.com

Affiliation: Oberon Fuels, Inc.

Subject: Oberon Fuels Comments on CARB LCFS Proposed Amendments August 27 2024  
Comment:

Oberon Fuels Comments on CARB LCFS Proposed Amendments August 27  
2024

Attachment: [www.arb.ca.gov/lists/com-attach/7435-lcfs2024-AG9cOFI2U3JROANt.pdf](http://www.arb.ca.gov/lists/com-attach/7435-lcfs2024-AG9cOFI2U3JROANt.pdf)

Original File Name: Oberon Fuels Comments on CARB LCFS Proposed Amendments August  
27 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:03:03

No Duplicates.

**Comment 106 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Asher

Last Name: Goldman

Email Address: asher@generatecapital.com

Affiliation:

Subject: Generate Capital Comments on Proposed Amendments to LCFS

Comment:

Please see Generate Capital's comments on the LCFS proposal  
attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7436-lcfs2024-VjEHZARrWG4Ddwdm.pdf](http://www.arb.ca.gov/lists/com-attach/7436-lcfs2024-VjEHZARrWG4Ddwdm.pdf)

Original File Name: Generate Capital Comments on LCFS\_8.27.2024\_vF.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:02:27

No Duplicates.



**Comment 107 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Tom

Last Name: Van Heeke

Email Address: tvanheeke@rivian.com

Affiliation: Rivian Automotive

Subject: Comments in Support of the LCFS and Proposed Modified Text

Comment:

Rivian is pleased to submit the attached comments in support of the LCFS and key aspects of the proposed modifications to the LCFS amendments.

-Tom Van Heeke

Attachment: [www.arb.ca.gov/lists/com-attach/7438-lcfs2024-UCIGaVQjUGpWMQFv.pdf](http://www.arb.ca.gov/lists/com-attach/7438-lcfs2024-UCIGaVQjUGpWMQFv.pdf)

Original File Name: Rivian\_LCFSAmendments15DayComments\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:05:51

No Duplicates.

**Comment 108 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Danielle

Last Name: Weizman

Email Address: dweizman@sdge.com

Affiliation: California Joint Utilities

Subject: CA Utilities' Comments on Proposed LCFS Amendments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7439-lcfs2024-BWRVJgFnACZVIAB0.pdf](http://www.arb.ca.gov/lists/com-attach/7439-lcfs2024-BWRVJgFnACZVIAB0.pdf)

Original File Name: August 27 FINAL CA Utility 15-Day Comment Letter.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:05:30

No Duplicates.

**Comment 109 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Don

Last Name: Schinske

Email Address: don@lcfccoalition.com

Affiliation: Low Carbon Fuels Coalition

Subject: Response to LCFS Proposed Amendments

Comment:

Please note that this letter replaces an earlier version submitted today. Thanks much.

Attachment: [www.arb.ca.gov/lists/com-attach/7440-lcfs2024-B2tVMAdgUGACW1U2.pdf](http://www.arb.ca.gov/lists/com-attach/7440-lcfs2024-B2tVMAdgUGACW1U2.pdf)

Original File Name: LCFC CSA committee letter to CARB - 27Aug24.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:04:46

No Duplicates.

**Comment 110 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Neil

Last Name: Koehler

Email Address: neil.koehler@kbe-llc.com

Affiliation: Renewable Fuels Association

Subject: RFA Comments on 15 day package-Proposed Amendments to the LCFS

Comment:

Please see RFA comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7442-lcfs2024-AXMCYgZmBAhVMFQ7.pdf](http://www.arb.ca.gov/lists/com-attach/7442-lcfs2024-AXMCYgZmBAhVMFQ7.pdf)

Original File Name: RFA Comments on CARB Proposed LCFS Modifications 8-27-24.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:03:39

No Duplicates.

**Comment 111 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: John  
Last Name: Plaza  
Email Address: amy@skynrg.com  
Affiliation: SkyNRG

Subject: Comments on Low Carbon Fuel Standard 15-Day Amendments  
Comment:

SkyNRG appreciates the opportunity to provide comments in response to the Low Carbon Fuel Standard (LCFS) proposed 15-day changes uploaded as an attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/7443-lcfs2024-VWdRZwEyUzRWfVBg.pdf](http://www.arb.ca.gov/lists/com-attach/7443-lcfs2024-VWdRZwEyUzRWfVBg.pdf)

Original File Name: 2024-08-27 SkyNRG Comments - Proposed 15-Day Changes  
LCFS\_final.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:05:26

No Duplicates.

**Comment 112 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Noah

Last Name: Garcia

Email Address: noah.garcia@evgo.com

Affiliation: EVgo

Subject: EVgo Comments on 15 Day Changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7444-lcfs2024-BmoHYII1WHhXDgU0.pdf](http://www.arb.ca.gov/lists/com-attach/7444-lcfs2024-BmoHYII1WHhXDgU0.pdf)

Original File Name: LCFS 15\_Day Package Comments Final.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:18:44

No Duplicates.

**Comment 113 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Fred

Last Name: Ghatala

Email Address: fghatala@advancedbiofuels.ca

Affiliation: Advanced Biofuels Canada (Association)

Subject: Comments from Advanced Biofuels Canada (Association)

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7445-lcfs2024-UjNdOVQzBzcLUlc0.pdf](http://www.arb.ca.gov/lists/com-attach/7445-lcfs2024-UjNdOVQzBzcLUlc0.pdf)

Original File Name: ABFC\_CARB\_LCFS\_15\_day\_comments\_August\_27\_2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:14:44

No Duplicates.

**Comment 114 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Paul

Last Name: Gross

Email Address: paul@remoracarbon.com

Affiliation: Remora

Subject: Comments on the Proposed Amendments to the LCFS Regulation

Comment:

Please see Remora's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7446-lcfs2024-VzRQOQBsU3ACaARh.pdf](http://www.arb.ca.gov/lists/com-attach/7446-lcfs2024-VzRQOQBsU3ACaARh.pdf)

Original File Name: Complete\_with\_Docusign\_20240827\_\_\_\_Remora\_.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:17:21

No Duplicates.



**Comment 115 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Grant

Last Name: Kimberley

Email Address: grantk@iowabiodiesel.org

Affiliation: Iowa Biodiesel Board

Subject: Comments from Iowa Biodiesel Board

Comment:

See attached comments from the Iowa Biodiesel Board.

Attachment: [www.arb.ca.gov/lists/com-attach/7447-lcfs2024-BmoHYgdgAiIEXVMj.pdf](http://www.arb.ca.gov/lists/com-attach/7447-lcfs2024-BmoHYgdgAiIEXVMj.pdf)

Original File Name: LCFS Proposed Rule Comments Iowa Biodiesel Board.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:21:05

No Duplicates.

**Comment 116 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Brian

Last Name: Kee

Email Address: brian.kee@mn8energy.com

Affiliation: Mercedes-Benz High Power Charging

Subject: MB HPC Comments on CARB's Proposed 15-Day Amendments to the Low Carbon  
Fuel Standard

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7448-lcfs2024-UD0CZlc+VXZRNFMm.pdf](http://www.arb.ca.gov/lists/com-attach/7448-lcfs2024-UD0CZlc+VXZRNFMm.pdf)

Original File Name: MBHPC Comments on the LCFS Proposed Amendments\_08.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:09:00

No Duplicates.

**Comment 117 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 118 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Gary

Last Name: Grimes

Email Address: ggrimes@worldenergy.net

Affiliation:

Subject: World Energy's Comments on the 15-Day Proposed Amendments to the Low Carbon Fuel Standard

Comment:

Attached, please find World Energy's comments and concerns for consideration in response to the 15-Day Proposed Amendments shared on August 12. Thank you for the opportunity to provide this feedback.

Attachment: [www.arb.ca.gov/lists/com-attach/7450-lcfs2024-VGZUZIRIBW4LPwE2.pdf](http://www.arb.ca.gov/lists/com-attach/7450-lcfs2024-VGZUZIRIBW4LPwE2.pdf)

Original File Name: 240827 World Energy - LCFS 15-Day Comments (Final).pdf

Date and Time Comment Was Submitted: 2024-08-27 14:25:02

No Duplicates.

**Comment 119 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Nora

Last Name: Cohen Brown

Email Address: nora@charmindustrial.com

Affiliation: Charm Industrial

Subject: Charm's Comments on the Proposed Amendments

Comment:

Please see Charm's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7451-lcfs2024-BzcHOVd4UTBXZgAu.pdf](http://www.arb.ca.gov/lists/com-attach/7451-lcfs2024-BzcHOVd4UTBXZgAu.pdf)

Original File Name: 08.27.2024 \_ LCFS 15-Day Redline Comments.docx.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:24:17

No Duplicates.

**Comment 120 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: William  
Last Name: Graham  
Email Address: billg@dvoinc.com  
Affiliation: DVO, Inc.

Subject: 15-Day comment period on LCFS Rulemaking  
Comment:

Please find attached comment letter from DVO, Inc.

Attachment: [www.arb.ca.gov/lists/com-attach/7452-lcfs2024-AWJdNARoUW8CYVA+.pdf](http://www.arb.ca.gov/lists/com-attach/7452-lcfs2024-AWJdNARoUW8CYVA+.pdf)

Original File Name: Comments by DVO Inc on LCFS Rulemaking 082724.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:30:16

No Duplicates.

**Comment 121 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Katie

Last Name: Saliccioli

Email Address: ksalcicc@ford.com

Affiliation: Ford Motor Company

Subject: Ford Comments on LCFS 15-Day Notice

Comment:

Ford hereby submits our comments on the Low Carbon Fuel Standard (LCFS) Proposed 15-Day Changes. Thank you for your time and consideration of our comments.

Attachment: [www.arb.ca.gov/lists/com-attach/7453-lcfs2024-UTdWP1wvUGdXDgNg.pdf](http://www.arb.ca.gov/lists/com-attach/7453-lcfs2024-UTdWP1wvUGdXDgNg.pdf)

Original File Name: Ford Comments on LCFS 15-Day Notice 27Aug2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 13:59:47

No Duplicates.

**Comment 122 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Sarah

Last Name: Somorai

Email Address: ssomorai@hmausa.com

Affiliation: Hyundai Motor North America

Subject: Hyundai's Comments to CARB's LCFS 15-Day Changes

Comment:

Thank you for the opportunity to comment. Please see Hyundai Motor North America's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7454-lcfs2024-WzMAfwRwVGkEZlc2.pdf](http://www.arb.ca.gov/lists/com-attach/7454-lcfs2024-WzMAfwRwVGkEZlc2.pdf)

Original File Name: Hyundai - CARB LCFS 15 Day Comments (08272024).pdf

Date and Time Comment Was Submitted: 2024-08-27 14:35:23

No Duplicates.



**Comment 123 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Orran

Last Name: Balagopalan

Email Address: obalagopalan@smwlaw.com

Affiliation: Shute, Mihaly & Weinberger LLP

Subject: Leadership Counsel for Justice and Accountability Comments on Notice of Availability  
Comment:

Please see the attached comments from Orran Balagopalan, on behalf of the Leadership Counsel for Justice and Accountability, regarding the Notice of Public Availability of Additional Modifications to the Proposed Amendments to the LCFS.

Attachment: [www.arb.ca.gov/lists/com-attach/7455-lcfs2024-UmNWZQcrVWJSNQR9.pdf](http://www.arb.ca.gov/lists/com-attach/7455-lcfs2024-UmNWZQcrVWJSNQR9.pdf)

Original File Name: 15-Day Comments on the Additional Modification to the Proposed LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:33:51

No Duplicates.

**Comment 124 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Chris

Last Name: Vervaet

Email Address: [chris.vervaet@copacanada.com](mailto:chris.vervaet@copacanada.com)

Affiliation: Canola Council / Canadian Oilseed Proces

Subject: Canadian canola industry submission

Comment:

Please find submission enclosed

Attachment: [www.arb.ca.gov/lists/com-attach/7456-lcfs2024-VjVQNQRmUiwFYAZp.pdf](http://www.arb.ca.gov/lists/com-attach/7456-lcfs2024-VjVQNQRmUiwFYAZp.pdf)

Original File Name: CCC-COPA submission\_ Proposed Ammendments to CA LCFS\_Aug  
27\_final.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:42:03

No Duplicates.

**Comment 125 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 126 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: John

Last Name: Rosenfeld

Email Address: john.rosenfeld@proteumenergy.com

Affiliation: Proteum Energy, LLC

Subject: Comments to 15-day Notice of Proposed Amendments to LCFS

Comment:

Please see Proteum Energy, LLC's comment letter attached.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/7458-lcfs2024-ADEGNVF9UmUHYAN6.pdf](http://www.arb.ca.gov/lists/com-attach/7458-lcfs2024-ADEGNVF9UmUHYAN6.pdf)

Original File Name: 15-day comments 08 27 24.02 PROTEUM ENERGY.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:41:17

No Duplicates.

**Comment 127 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Trisha

Last Name: Dello lacono

Email Address: tdelloiacono@calstart.org

Affiliation:

Subject: CALSTART Comments on 15-Day Changes to the LCFS

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7459-lcfs2024-VzRRNgBtUXEAclc2.pdf](http://www.arb.ca.gov/lists/com-attach/7459-lcfs2024-VzRRNgBtUXEAclc2.pdf)

Original File Name: CALSTART LCFS 15-Day Comments.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:44:51

No Duplicates.

**Comment 128 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Samuel

Last Name: Goda

Email Address: samuel.goda@kaluza.com

Affiliation:

Subject: Comments of Kaluza on the Proposed 15-Day Changes to the LCFS Proposed  
Amendments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7460-lcfs2024-WzgGbwBsVGoEZ1I8.pdf](http://www.arb.ca.gov/lists/com-attach/7460-lcfs2024-WzgGbwBsVGoEZ1I8.pdf)

Original File Name: Comments of Kaluza on the Proposed 15-Day Changes to the Proposed  
Amendments to the Low Carbon Fuel Standard.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:45:51

No Duplicates.

**Comment 129 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Casey

Last Name: Coward

Email Address: casey.coward@seiu-usww.org

Affiliation:

Subject: Comments on LCFS Amendments - SEIU USWW

Comment:

Please see the attached for SEIU USWW's comment letter on the most recent LCFS rulemaking amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/7461-lcfs2024-BmpTNIQzACBXDgNz.pdf](http://www.arb.ca.gov/lists/com-attach/7461-lcfs2024-BmpTNIQzACBXDgNz.pdf)

Original File Name: LCFS Public Comment - SEIU USWW - August 27 - Legal\_DH signed 8.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:49:17

No Duplicates.

**Comment 130 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Cory-Ann

Last Name: Wind

Email Address: cwind@cleanfuels.org

Affiliation: Clean Fuels Alliance America

Subject: CFAA and CABA comments on the 15-day package

Comment:

Thank you for the opportunity to submit these comments on the  
15-day package.

Attachment: [www.arb.ca.gov/lists/com-attach/7463-lcfs2024-UDNQMFiyUmBXDIQ3.pdf](http://www.arb.ca.gov/lists/com-attach/7463-lcfs2024-UDNQMFiyUmBXDIQ3.pdf)

Original File Name: CFAA CABA Comments on 15 Day Package.Final.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:52:42

No Duplicates.



**Comment 131 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Linda

Last Name: White

Email Address: linda.white@bmwna.com

Affiliation: BMW

Subject: LCFS 15-Day Comment

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7464-lcfs2024-UDIFbgRyU24DZAZZ.pdf](http://www.arb.ca.gov/lists/com-attach/7464-lcfs2024-UDIFbgRyU24DZAZZ.pdf)

Original File Name: BMWNA Comments LCFS2024August27\_signedTR.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:53:08

No Duplicates.

**Comment 132 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: John

Last Name: Jones

Email Address: john.jones@fidelisinfra.com

Affiliation: Fidelis New Energy

Subject: Fidelis New Energy, LLC Comments on the Proposed 15-Day Changes to the LCFS  
Comment:

Fidelis appreciates the opportunity to provide the attached  
feedback on the proposed modifications (15-day Changes) to the Low  
Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/7465-lcfs2024-UjRWOVI3VGJVPwdu.pdf](http://www.arb.ca.gov/lists/com-attach/7465-lcfs2024-UjRWOVI3VGJVPwdu.pdf)

Original File Name: Fidelis Comments on 15 Day Proposed Rulemaking Package 08 27  
2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:51:01

No Duplicates.

**Comment 133 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Brian

Last Name: McDonald

Email Address: bcmcdonald@marathonpetroleum.com

Affiliation:

Subject: MPC Comments on CARB LCFS 15-day proposal

Comment:

see attached

Attachment: [www.arb.ca.gov/lists/com-attach/7466-lcfs2024-VzoHcQFjAg5VMABv.pdf](http://www.arb.ca.gov/lists/com-attach/7466-lcfs2024-VzoHcQFjAg5VMABv.pdf)

Original File Name: MPC comments to CARB\_LCFS \_15 day.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:51:18

No Duplicates.

## **Comment 134 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Michael

Last Name: LaCavera

Email Address: michael.lacavera@vopak.com

Affiliation: Vopak Terminal Los Angeles Inc.

Subject: Support for Including Green Methanol as an Opt-In Fuel: LCFS Amendments  
Comment:

Dear California Air Resources Board:

Vopak is submitting this letter of support for the inclusion of green methanol as a marine fuel into the Low Carbon Fuel Standard (LCFS).

Vopak operates bulk liquid marine terminals in ports around the world, including the ports of Los Angeles and Long Beach. Vopak does not own the products that we store, but we are a service provider that helps products that are critical to our society, safely and efficiently flow to end users. In Los Angeles and Long Beach, Vopak is a critical part of the infrastructure, handling significant portions of the supply of jet fuel and Sustainable Aviation Fuel (SAF) destined for Los Angeles International Airport (LAX) and bunker fuels and renewable diesel used to fuel many of the vessels calling on the ports.

The commercial aviation industry and the maritime shipping industry are two industries that are not suitable for full electrification. The use of SAF for aviation and green methanol for maritime activities can result in significant reductions in carbon emissions over a relatively short timeline. With regard to green methanol, a major advantage of this fuel is the current existence of infrastructure capable of handling this product in California ports. For example, storage tanks that store traditional marine fuels today can be repurposed to handle green methanol. Similarly, barges that transport traditional bunker fuels to vessels within the port today can also be repurposed to handle green methanol.

In contrast, other zero carbon or low carbon fuels being proposed for the marine sector will require the construction of completely new facilities and equipment that would take many years to permit and construct. And, since those other fuels present significantly higher risk profiles compared to traditional marine fuels or green methanol, it will be extremely challenging for those projects to obtain the California Environmental Quality Act (CEQA) certifications necessary to move forward.

The use of green methanol will reduce both carbon emissions and improve air quality. Compared to conventional fuels such as diesel, green methanol cuts carbon emissions by up to 95%, reduces nitrogen oxide emissions by up to 80% and completely eliminates sulfur oxide and particulate matter emissions.

(see <https://www.methanol.org/renewable/>)

Amending the LCFS regulations to allow low carbon intensity green methanol to generate credits when used in marine transportation will incentivize its use as a substitute for conventional fuels, leading to an overall reduction of marine transportation related emissions.

Making this change will help California realize its goals to improve air quality and address global climate change.

Sincerely,

Vopak Terminal Los Angeles Inc.  
Vopak Terminal Long Beach Inc.

Michael LaCavera  
SVP Commercial & BD U.S. & Canada

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-27 14:53:35

No Duplicates.

**Comment 135 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Miles

Last Name: Heller

Email Address: hellermt@airproducts.com

Affiliation: Air Products

Subject: Comments regarding LCFS 15-day amendment package

Comment:

Please find our comments attached

Attachment: [www.arb.ca.gov/lists/com-attach/7468-lcfs2024-UDEGaVAjBwsFcwR2.pdf](http://www.arb.ca.gov/lists/com-attach/7468-lcfs2024-UDEGaVAjBwsFcwR2.pdf)

Original File Name: Air Products Comments August 12th 15-Day Package final.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:59:09

No Duplicates.

**Comment 136 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Julia

Last Name: Levin

Email Address: jlevin@bioenergyca.org

Affiliation: Bioenergy Association of California

Subject: BAC Comments on LCFS (15-day language)

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7469-lcfs2024-UzFUMwNhAAxWMwRr.pdf](http://www.arb.ca.gov/lists/com-attach/7469-lcfs2024-UzFUMwNhAAxWMwRr.pdf)

Original File Name: BAC Comments on LCFS changes (15-day language).pdf

Date and Time Comment Was Submitted: 2024-08-27 14:59:43

No Duplicates.

**Comment 137 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Dan

Last Name: Willis

Email Address: [dwillis@sfgov.org](mailto:dwillis@sfgov.org)

Affiliation: San Francisco Pub Utilities Commission

Subject: SFPUC, SFMTA, SF Airport - LCFS Rulemaking 15-Day Comments

Comment:

Thank you for considering the attached joint comment 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/7470-lcfs2024-UyAHZ10sByFQNQZZ.pdf](http://www.arb.ca.gov/lists/com-attach/7470-lcfs2024-UyAHZ10sByFQNQZZ.pdf)

Original File Name: SFPUC\_CARB\_LCFS\_15-Day\_082724.pdf

Date and Time Comment Was Submitted: 2024-08-27 14:54:48

No Duplicates.



**Comment 138 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Monte

Last Name: Shaw

Email Address: mshaw@iowarfa.org

Affiliation:

Subject: IRFA Comments on Proposed 15-Day Changes to the Proposed Regulation Order  
Comment:

See attached for full comments.

Attachment: [www.arb.ca.gov/lists/com-attach/7471-lcfs2024-WzgHYFAjBzYFLVQ3.pdf](http://www.arb.ca.gov/lists/com-attach/7471-lcfs2024-WzgHYFAjBzYFLVQ3.pdf)

Original File Name: CARB.comments.240827.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:04:43

No Duplicates.

**Comment 139 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Dallas

Last Name: Gerber

Email Address: dgerber@growthenergy.org

Affiliation: Growth Energy

Subject: Proposed LCFS Amendments Comments from Growth Energy

Comment:

Please see the attached comments from Growth Energy's Senior Vice  
President of Regulatory Affairs Chris Bliley.

Attachment: [www.arb.ca.gov/lists/com-attach/7472-lcfs2024-BzUHMQAzUjUDK1Vl.pdf](http://www.arb.ca.gov/lists/com-attach/7472-lcfs2024-BzUHMQAzUjUDK1Vl.pdf)

Original File Name: 2024.08.27 - LCFS Proposed Amendments Comments.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:06:13

No Duplicates.

**Comment 140 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Hossein

Last Name: Tabatabaie

Email Address: htabatabaie@iwatani.com

Affiliation: Iwatani Corporation of America

Subject: Iwatani Comments on the LCFS Amendments

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7473-lcfs2024-AWgAcQNjByBQNwZo.pdf](http://www.arb.ca.gov/lists/com-attach/7473-lcfs2024-AWgAcQNjByBQNwZo.pdf)

Original File Name: Iwatani Corporation of America-Comment Letter.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:05:45

No Duplicates.

**Comment 141 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Michael

Last Name: Caprio

Email Address: mcaprio@republicservices.com

Affiliation:

Subject: Low Carbon Fuel Standard - 15 Day Proposed Rule

Comment:

Comment letter is attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7474-lcfs2024-AnBWNVEgWH4DZwll.pdf](http://www.arb.ca.gov/lists/com-attach/7474-lcfs2024-AnBWNVEgWH4DZwll.pdf)

Original File Name: Republic Services LCFS 15 Day Draft Reg 082724.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:11:52

No Duplicates.

## **Comment 142 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Timothy

Last Name: Johnson

Email Address: tjohnson@dieseldirect.com

Affiliation: Senior Vice President @ Diesel Direct

Subject: Diesel Direct Comments on the CARB LCFS Rulemaking

Comment:

The demand for renewable diesel depends on an even-playing field with petroleum diesel indexes. When this cost-balance is disrupted, even the greenest and proudest customers utilizing renewable diesel tend to default to the least expensive product. Their ability to be competitive in the market depends on it.

Though the environmental benefits & fleet performance of RD99 greatly exceeds that of fossil-diesel, most users of RD99 are not able to pay more in a highly competitive world even though they support the goal of using this sustainable commodity.

We therefore respectfully request that CARB not enact the phaseout of RD pathways, an arbitrary cap on feedstocks or unnecessary sustainability requirements

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-27 15:11:03

No Duplicates.

**Comment 143 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Michael

Last Name: Caprio

Email Address: mcaprio@republicservices.com

Affiliation: Republic Services

Subject: Low Carbon Fuel Standard - 15 Day Proposed Rule

Comment:

First submittal may not have gone through. Attached file is the same as sent on first attempt.

Attachment: [www.arb.ca.gov/lists/com-attach/7476-lcfs2024-VCYFZIEgVHIFYVU5.pdf](http://www.arb.ca.gov/lists/com-attach/7476-lcfs2024-VCYFZIEgVHIFYVU5.pdf)

Original File Name: Republic Services LCFS 15 Day Draft Reg 082724.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:15:47

No Duplicates.

**Comment 144 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Gene

Last Name: Harrington

Email Address: gharrington@bio.org

Affiliation: Biotechnology Innovation Organization

Subject: Proposed August 2024 15-Day Changes

Comment:

The Biotechnology Innovation Organization appreciates the opportunity to comment on CARB's proposed 15-day changes and submits the attached letter for the record and CARB's consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/7477-lcfs2024-BWQHdFYwAiRVIAVx.pdf](http://www.arb.ca.gov/lists/com-attach/7477-lcfs2024-BWQHdFYwAiRVIAVx.pdf)

Original File Name: August2024BIOCALCFSProposedChangesCommentsFINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:14:06

No Duplicates.

**Comment 145 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Katie

Last Name: Muckenhirn

Email Address: kmuckenhirn@ethanol.org

Affiliation: American Coalition for Ethanol

Subject: ACE Comments on Additional LCFS Proposed Amendments Announced 8/12/24  
Comment:

On behalf of the American Coalition for Ethanol (ACE), please see comments attached from ACE CEO Brian Jennings in response to additional amendments proposed on August 12 by the California Air Resources Board (CARB) on the Low Carbon Fuel Standard (LCFS).

Best,  
Katie

Attachment: [www.arb.ca.gov/lists/com-attach/7478-lcfs2024-B2ZdOFA0Ag4FYFAx.pdf](http://www.arb.ca.gov/lists/com-attach/7478-lcfs2024-B2ZdOFA0Ag4FYFAx.pdf)

Original File Name: ACE Calif LCFS comments on August 12 amendment package 8.27.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:14:54

No Duplicates.



## **Comment 146 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Graham

Last Name: Noyes

Email Address: graham@noyeslawcorp.com

Affiliation: Noyes Law Corporation for Infinium

Subject: Joint Comments RE: Importance of Book-and-Claim Accounting for Power to Liquids Fuels

Comment:

Dear Clerk of the Board,

The following is a summary of this comment. Attached please find the full comment submitted on behalf of Aether Fuels, Air Company, Airlines for America, Arcadia, Dimensional Energy, Infinium, TES, and Twelve.

The signatories of this letter are pleased to submit comments regarding the modifications ("15-Day Changes") that the California Air Resources Board ("CARB") has made to its previously proposed amendments to the Low Carbon Fuel Standard ("LCFS"). The specific changes that we are commenting upon are the changes made to proposed §95488.8(i)(1) pertaining to "Book-and-Claim Accounting for Low-CI Electricity Supplied as a Transportation Fuel, Direct Air Capture projects, or Used to Produce Hydrogen as a transportation fuel." These 15-Day Changes modify the fuels that are eligible to use Book-and-Claim Accounting and modify the requirements for Book-and-Claim Accounting. We disagree with these modifications because the proposed LCFS regulations do not authorize Power-to-Liquid ("PtL") fuels to use Book-and-Claim Accounting despite the vital importance of PtL fuels to transportation decarbonization. This comment is submitted consistent with the requirements of Government Code §11346.8(c).

Please let me know if there are any questions relating to this comment or filing.

Best Regards,

Graham Noyes  
Noyes Law Corporation  
419 Broad Street, Suite E  
Nevada City, CA 95959  
www.fuelandcarbonlaw.com  
(530)264-7157 Direct  
graham@noyeslawcorp.com  
[@Graham Noyes](https://www.linkedin.com/in/grahamnoyes)

Attachment: [www.arb.ca.gov/lists/com-attach/7479-lcfs2024-AGoAaQBoUG1XJQRb.pdf](http://www.arb.ca.gov/lists/com-attach/7479-lcfs2024-AGoAaQBoUG1XJQRb.pdf)

Original File Name: Joint eFuel LCFS 15d\_withlogo\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:14:42

No Duplicates.

**Comment 147 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Chad

Last Name: Frahm

Email Address: chad.frahm@brightmark.com

Affiliation: Brightmark

Subject: Brightmark comments to CARB LCFS amendments (15-day package)

Comment:

See comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7480-lcfs2024-VjRQJAFpUWVSPFUh.pdf](http://www.arb.ca.gov/lists/com-attach/7480-lcfs2024-VjRQJAFpUWVSPFUh.pdf)

Original File Name: Brightmark comments.CARB LCFS amendments.Aug 27 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:17:15

No Duplicates.

**Comment 148 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Katie

Last Name: Smith

Email Address: katie\_smith@cargill.com

Affiliation: Heartwell Renewables

Subject: LCFS

Comment:

Heartwell Renewables appreciates the opportunity to provide comments on the California Air Resources Board's (CARB) proposed 15-Day Changes to the Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation (15-day package).

Attachment: [www.arb.ca.gov/lists/com-attach/7481-lcfs2024-Bm4BYgNjV3ZSIAB3.pdf](http://www.arb.ca.gov/lists/com-attach/7481-lcfs2024-Bm4BYgNjV3ZSIAB3.pdf)

Original File Name: Heartwell Comments\_15 Day LCFS .pdf

Date and Time Comment Was Submitted: 2024-08-27 15:24:00

No Duplicates.

**Comment 149 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Thereza

Last Name: Cevidanes

Email Address: tcevidanes@natso.com

Affiliation: NATSO, SIGMA

Subject: NATSO, SIGMA Comments on Proposed LCFS Amendments

Comment:

Please see attached for comments from NATSO, Representing America's Travel Plazas and Truckstops, and SIGMA: America's Leading Fuel Marketers on the "Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information for the Proposed Low Carbon Fuel Standard Amendments."

Attachment: [www.arb.ca.gov/lists/com-attach/7482-lcfs2024-AmxTNFwpUnJXPgJd.pdf](http://www.arb.ca.gov/lists/com-attach/7482-lcfs2024-AmxTNFwpUnJXPgJd.pdf)

Original File Name: NATSO SIGMA Comments on LCFS Proposed Changes.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:28:42

No Duplicates.

**Comment 150 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Dean

Last Name: Taylor

Email Address: Dean@calETC.com

Affiliation:

Subject: Joint EVCA and CalETC letter on LCFS 15-day changes

Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/7483-lcfs2024-VjNSIIMxBDYKIQdk.pdf](http://www.arb.ca.gov/lists/com-attach/7483-lcfs2024-VjNSIIMxBDYKIQdk.pdf)

Original File Name: EVCA-CalETC comment letter on proposed LCFS 15-day changes August 27 vF.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:35:13

No Duplicates.

**Comment 151 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Emily

Last Name: Lemei

Email Address: emily.lemei@ncpa.com

Affiliation: Northern California Power Agency

Subject: NCPA Comments on 15-Day Changes to the LCFS

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/7484-lcfs2024-VzkHYIMiVWcDWIMw.pdf](http://www.arb.ca.gov/lists/com-attach/7484-lcfs2024-VzkHYIMiVWcDWIMw.pdf)

Original File Name: NCPA Comments on 15-Day LCFS Changes\_082724.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:36:42

No Duplicates.

**Comment 152 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Zach

Last Name: Woogen

Email Address: [zwoogen@vgicouncil.org](mailto:zwoogen@vgicouncil.org)

Affiliation: Vehicle-Grid Integration Council

Subject: Vehicle-Grid Integration Council (VGIC) 15-Day Comments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7485-lcfs2024-ATMHMVJhUjULIAc3.pdf](http://www.arb.ca.gov/lists/com-attach/7485-lcfs2024-ATMHMVJhUjULIAc3.pdf)

Original File Name: 2024-08-27 VGIC LCFS 15-Day Comments.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:43:41

No Duplicates.



**Comment 153 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Joshua

Last Name: Wilson

Email Address: josh.wilson@poet.com

Affiliation:

Subject: POET's Comments on CARB's Modified Proposed LCFS Amendments (15-Day  
Changes)

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7486-lcfs2024-BzdRbwc0UTUANFV1.pdf](http://www.arb.ca.gov/lists/com-attach/7486-lcfs2024-BzdRbwc0UTUANFV1.pdf)

Original File Name: 08272024\_POET Comments on CARB Modified Proposed Amendments to  
LCFS.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:45:01

No Duplicates.

**Comment 154 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Michael

Last Name: McAdams

Email Address: michael@abfa.org

Affiliation: Advanced Biofuels Association

Subject: Advanced Biofuels Association Comments

Comment:

Please see enclosed.

Attachment: [www.arb.ca.gov/lists/com-attach/7487-lcfs2024-BWQHY1UyADIHXgkk.pdf](http://www.arb.ca.gov/lists/com-attach/7487-lcfs2024-BWQHY1UyADIHXgkk.pdf)

Original File Name: ABFA - August 2024 CARB Amendments Public Comments - Final.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:47:48

No Duplicates.

**Comment 155 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Ashimi

Last Name: Patel

Email Address: [apatel@parpacific.com](mailto:apatel@parpacific.com)

Affiliation: Par Pacific Holdings, Inc.

Subject: Par Pacific Comments on the 15-Day Package

Comment:

Please see Par Pacific's comments on the 15-day package in the letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7488-lcfs2024-VCRXMFUmUl5SJABh.pdf](http://www.arb.ca.gov/lists/com-attach/7488-lcfs2024-VCRXMFUmUl5SJABh.pdf)

Original File Name: Par Pacific Comments on the 15-Day Package.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:50:18

No Duplicates.

**Comment 156 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Mikhael

Last Name: Skvarla

Email Address: mik@calobby.com

Affiliation:

Subject: CCEEB's Comments on 15-day Changes to the Proposed LCFS Regulation

Comment:

Please see the attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/7489-lcfs2024-UDMHYgNnAzVXM1cI.pdf](http://www.arb.ca.gov/lists/com-attach/7489-lcfs2024-UDMHYgNnAzVXM1cI.pdf)

Original File Name: CCEEB 15-Day LCFS Comments - Final.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:52:21

No Duplicates.

**Comment 157 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Michael

Last Name: Boccadoro

Email Address: mboccadoro@westcoastadvisors.com

Affiliation: Dairy Cares

Subject: Dairy Cares Comments on the Proposed LCFS Amendments (15-Day Changes)

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7490-lcfs2024-BTdWZFNiBG9QZFJl.pdf](http://www.arb.ca.gov/lists/com-attach/7490-lcfs2024-BTdWZFNiBG9QZFJl.pdf)

Original File Name: 240827 Dairy Cares Comments on Proposed LCFS Amendments (15-Day Changes) (00642254xBA8E1).pdf

Date and Time Comment Was Submitted: 2024-08-27 15:52:27

No Duplicates.

**Comment 158 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Michael

Last Name: Maguire

Email Address: Michael.Maguire@opr.ca.gov

Affiliation: Governor's Office of Planning & Research

Subject: OPR 15-day comment letter on LCFS

Comment:

See signed letter from OPR Director, Sam Assefa.

Attachment: [www.arb.ca.gov/lists/com-attach/7491-lcfs2024-UjRVOgdoBTcDaVcI.pdf](http://www.arb.ca.gov/lists/com-attach/7491-lcfs2024-UjRVOgdoBTcDaVcI.pdf)

Original File Name: Final\_OPR 15-day comment letter on LCFS (8.27.2024).pdf

Date and Time Comment Was Submitted: 2024-08-27 15:51:04

No Duplicates.

**Comment 159 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Tim

Last Name: Phelps

Email Address: tim@afhathaway.com

Affiliation: Indiana Ethanol Producers

Subject: LCFS Comments - Indiana Ethanol Producers Association

Comment:

see attached comments

Attachment: [www.arb.ca.gov/lists/com-attach/7492-lcfs2024-VWcANgQ3AmUELFRk.pdf](http://www.arb.ca.gov/lists/com-attach/7492-lcfs2024-VWcANgQ3AmUELFRk.pdf)

Original File Name: 2024.08.23 - Indiana Ethanol Producers CARB Letter.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:51:49

No Duplicates.

**Comment 160 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: JULEE

Last Name: MALINOWSKI-BALL

Email Address: julee@ppallc.com

Affiliation:

Subject: CBEA COMMENTS: RE PUBLIC COMMENT ON PROPOSED AMENDMENTS  
TO LCFS

Comment:

CBEA COMMENTS RE PUBLIC COMMENT ON PROPOSED AMENDMENTS TO LCFS.

Attachment: [www.arb.ca.gov/lists/com-attach/7493-lcfs2024-VzRXMAR3BDVXDIU5.pdf](http://www.arb.ca.gov/lists/com-attach/7493-lcfs2024-VzRXMAR3BDVXDIU5.pdf)

Original File Name: CARB LCFS CBEA Comments 08-27-2024 (FINAL).pdf

Date and Time Comment Was Submitted: 2024-08-27 15:51:45

No Duplicates.



**Comment 161 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: John

Last Name: Barrow

Email Address: jack.barrow@btr.energy

Affiliation: Bridge to Renewables (BTR)

Subject: BTR comments on LCFS 15 day amendments

Comment:

BTR appreciates the work of CARB staff on the LCFS amendment process and the opportunity to comment on CARB's latest proposal. Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/7494-lcfs2024-WjhSIF0uU15QOIIX.pdf](http://www.arb.ca.gov/lists/com-attach/7494-lcfs2024-WjhSIF0uU15QOIIX.pdf)

Original File Name: BTR LCFS Comments 8.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:16:39

No Duplicates.

**Comment 162 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Spencer

Last Name: Reeder

Email Address: spencer.reeder@audi.com

Affiliation: Audi of America

Subject: Comment submittal on proposed changes to LCFS program

Comment:

Please see attached file containing Audi of America's comments on CARB's 15-day notice of proposed changes to the Low Carbon Fuel Standard (LCFS) program.

Attachment: [www.arb.ca.gov/lists/com-attach/7495-lcfs2024-AmNdNAFhUl4HbVc0.pdf](http://www.arb.ca.gov/lists/com-attach/7495-lcfs2024-AmNdNAFhUl4HbVc0.pdf)

Original File Name: AoA\_LCFS\_15day\_Comments\_v2\_27Aug2024(FINAL).pdf

Date and Time Comment Was Submitted: 2024-08-27 15:54:41

No Duplicates.

**Comment 163 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Krysta

Last Name: Wanner

Email Address: krysta@westernpga.org

Affiliation: Western Propane Gas Association

Subject: LCFS 15-Day Language

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/7496-lcfs2024-UT0AZQFmV3dVDAhr.pdf](http://www.arb.ca.gov/lists/com-attach/7496-lcfs2024-UT0AZQFmV3dVDAhr.pdf)

Original File Name: LCFS Comment Letter 8.27.24 Final.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:02:11

No Duplicates.

**Comment 164 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Pete

Last Name: Budden

Email Address: pbudden@nrdc.org

Affiliation: Natural Resources Defense Council

Subject: NRDC Comments on EVs and Electrolytic Hydrogen

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7497-lcfs2024-WzUHcwZjUWEBWANv.pdf](http://www.arb.ca.gov/lists/com-attach/7497-lcfs2024-WzUHcwZjUWEBWANv.pdf)

Original File Name: NRDC LCFS letter\_Electrification and H2\_8-27-24 .pdf

Date and Time Comment Was Submitted: 2024-08-27 16:05:44

No Duplicates.

**Comment 165 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Austin  
Last Name: Heyworth  
Email Address: austin@heygovt.com  
Affiliation: UNICA

Subject: UNICA Comments Re: LCFS 15-Day  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7498-lcfs2024-AncCagFpADAAZwJd.pdf](http://www.arb.ca.gov/lists/com-attach/7498-lcfs2024-AncCagFpADAAZwJd.pdf)

Original File Name: UNICA Comments re\_ LCFS 15-Day - 8.27.24.docx.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:08:10

No Duplicates.

**Comment 166 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Emily

Last Name: McNiff

Email Address: emcniff@indianasoybean.com

Affiliation: Indiana Soybean Alliance

Subject: Comments from Indiana Soybean Alliance

Comment:

See attached comments from Indiana Soybean Alliance

Attachment: [www.arb.ca.gov/lists/com-attach/7499-lcfs2024-U2FdbwdZUiwGX1Bo.docx](http://www.arb.ca.gov/lists/com-attach/7499-lcfs2024-U2FdbwdZUiwGX1Bo.docx)

Original File Name: 24 - 8.27 CARB 15 Day Comments.docx

Date and Time Comment Was Submitted: 2024-08-27 16:12:03

No Duplicates.

**Comment 167 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Sam

Last Name: Wade

Email Address: sam@rngcoalition.com

Affiliation: Coalition for Renewable Natural Gas

Subject: RNG Coalition Comments on LCFS 15-Day Changes

Comment:

Please see our attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/7500-lcfs2024-W2lUZgAxWTILPwk+.pdf](http://www.arb.ca.gov/lists/com-attach/7500-lcfs2024-W2lUZgAxWTILPwk+.pdf)

Original File Name: 240827 RNGC 15 Day Comments.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:15:31

No Duplicates.

**Comment 168 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Kailee

Last Name: Tkacz Buller

Email Address: kbuller@nopa.org

Affiliation: National Oilseed Processors Association

Subject: National Oilseed Processors Association Public Comments

Comment:

The National Oilseed Processors Association (NOPA) appreciates the opportunity to comment in response to the California Air Resources Board's (CARB) proposed 15-Day Changes to the Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation (15-Day Changes or Proposal). NOPA's comprehensive comments are attached. We look forward to working with you and further discussing our views and suggestions.

Attachment: [www.arb.ca.gov/lists/com-attach/7501-lcfs2024-UD5SO1cmAjAFXAll.pdf](http://www.arb.ca.gov/lists/com-attach/7501-lcfs2024-UD5SO1cmAjAFXAll.pdf)

Original File Name: NOPA LCA Comments FINAL 8.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:14:49

No Duplicates.



**Comment 169 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Christine  
Last Name: Wolfe  
Email Address: cwolfe@wm.com  
Affiliation: WM

Subject: WM Comments on LCFS 15-Day Package  
Comment:

Please find WM's comments on the 15-Day Package attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7502-lcfs2024-BzVSZFVmVzAHLwMz.pdf](http://www.arb.ca.gov/lists/com-attach/7502-lcfs2024-BzVSZFVmVzAHLwMz.pdf)

Original File Name: 2024.08.27 LCFS 15 Day WM Comments.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:08:46

No Duplicates.

**Comment 170 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Scott

Last Name: Kennedy

Email Address: scott.kennedy@alaskaair.com

Affiliation: Alaska Airlines

Subject: Comments on Proposed LCFS Amendments

Comment:

Attached please find comments from Alaska Airlines on the proposed  
LCFS amendments. We appreciate your consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/7503-lcfs2024-AmNcNgNjWHhQPQhp.pdf](http://www.arb.ca.gov/lists/com-attach/7503-lcfs2024-AmNcNgNjWHhQPQhp.pdf)

Original File Name: Alaska Airlines Comments on CARB LCFS Rulemaking - 8.27.24 (1).pdf

Date and Time Comment Was Submitted: 2024-08-27 16:17:39

No Duplicates.

**Comment 171 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Tanya  
Last Name: DeRivi  
Email Address: tderivi@wspa.org  
Affiliation:

Subject: WSPA LCFS 15-Day Comments 8-27-2024  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7504-lcfs2024-Wi9QNFA3wAzFSM0D.zip](http://www.arb.ca.gov/lists/com-attach/7504-lcfs2024-Wi9QNFA3wAzFSM0D.zip)

Original File Name: WSPA LCFS 15-Day Comments and Appendix.zip

Date and Time Comment Was Submitted: 2024-08-27 16:24:01

No Duplicates.

**Comment 172 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Jeremy

Last Name: Martin

Email Address: [jmartin@ucsusa.org](mailto:jmartin@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: UCS Comments on LCFS 15-day changes

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7506-lcfs2024-AXQAZVwuVlpXMgVq.pdf](http://www.arb.ca.gov/lists/com-attach/7506-lcfs2024-AXQAZVwuVlpXMgVq.pdf)

Original File Name: UCS Comments on 15 Day changes to the LCFS- 7422.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:26:05

No Duplicates.

**Comment 173 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Paul

Last Name: Wilkins

Email Address: pwilkins@eh2.com

Affiliation: Electric Hydrogen

Subject: Electric Hydrogen Comments on the Low Carbon Fuel Standard's August 2024 15-Day  
Comment Pe

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7507-lcfs2024-VGRVawYpAmMCMwEv.docx](http://www.arb.ca.gov/lists/com-attach/7507-lcfs2024-VGRVawYpAmMCMwEv.docx)

Original File Name: 08.27.2024\_LCFS 15-Day Comment\_s\_EH2\_Final.docx

Date and Time Comment Was Submitted: 2024-08-27 16:12:59

No Duplicates.

**Comment 174 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation:

Subject: Joint Comments on LCFS 15-day Change Proposal

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7508-lcfs2024-UjgGb1w0VmsGdFMM.pdf](http://www.arb.ca.gov/lists/com-attach/7508-lcfs2024-UjgGb1w0VmsGdFMM.pdf)

Original File Name: Joint Comments\_ LCFS 15 Day Changes 8.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:30:33

No Duplicates.

**Comment 175 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Edward  
Last Name: Murphy  
Email Address: emurphy@spi-ind.com  
Affiliation: Sierra Pacific Industries

Subject: RE: Public Comment on Proposed Amendments to the Low Carbon Fuel Standards – 15  
Day Publi  
Comment:

Please find SPI's attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/7509-lcfs2024-WikGaQZiVncKfgNi.pdf](http://www.arb.ca.gov/lists/com-attach/7509-lcfs2024-WikGaQZiVncKfgNi.pdf)

Original File Name: SierraPacific Comments LCFS15Day 08222027.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:29:40

No Duplicates.

**Comment 176 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Stefan

Last Name: Unnasch

Email Address: unnasch@lifecycleassociates.com

Affiliation: Low Carbon Fuels Coalition

Subject: Low Carbon Fuels Coalition Biomass Working Group Comments

Comment:

Please see the attached comments submitted on behalf of the Low Carbon Fuels Coalition Working Group on Biomass.

Attachment: [www.arb.ca.gov/lists/com-attach/7510-lcfs2024-VTIUMVE2AzMAWQZl.pdf](http://www.arb.ca.gov/lists/com-attach/7510-lcfs2024-VTIUMVE2AzMAWQZl.pdf)

Original File Name: LCFC\_CALCFS\_Biomass\_Comment\_Letter\_27Aug2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:09:02

No Duplicates.



**Comment 177 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation:

Subject: CCA Comments on LCFS 15-day Change Proposal

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7511-lcfs2024-AmFXMIU1WVVXMgVq.pdf](http://www.arb.ca.gov/lists/com-attach/7511-lcfs2024-AmFXMIU1WVVXMgVq.pdf)

Original File Name: CCA Comments to CARB on LCFS 8.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:34:44

1 Duplicates.

**Comment 178 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Heather

Last Name: Dziedzic

Email Address: heather@americanbiogascouncil.org

Affiliation: American Biogas Council

Subject: ABC Comments on LCFS 15-Day Changes

Comment:

Attached please find our comments - thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/7513-lcfs2024-ADIGNFdmVzwGMgI1.pdf](http://www.arb.ca.gov/lists/com-attach/7513-lcfs2024-ADIGNFdmVzwGMgI1.pdf)

Original File Name: 240827 ABC LCFS 15 Day Comments.pdf

Date and Time Comment Was Submitted: 2024-08-27 15:56:20

No Duplicates.

**Comment 179 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Nicole

Last Name: Looney

Email Address: nicole.looney@smud.org

Affiliation:

Subject: SMUD's Comments on the Proposed 15-Day Changes

Comment:

SMUD's Comments on the Proposed 15-Day Changes.

Attachment: [www.arb.ca.gov/lists/com-attach/7514-lcfs2024-UGJXYVNgWT4CKgMz.pdf](http://www.arb.ca.gov/lists/com-attach/7514-lcfs2024-UGJXYVNgWT4CKgMz.pdf)

Original File Name: 2024.08.22\_SMUD Comments-15-Day Changes.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:36:52

No Duplicates.

**Comment 180 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Stefan

Last Name: Unnasch

Email Address: unnasch@lifecycleassociates.com

Affiliation: Life Cycle Associates

Subject: Life Cycle Associates Comments 15-day Notice Comments

Comment:

Please see the attached comments. Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/7515-lcfs2024-AGxWM1U1AAwEL1IN.pdf](http://www.arb.ca.gov/lists/com-attach/7515-lcfs2024-AGxWM1U1AAwEL1IN.pdf)

Original File Name: LCA\_-\_Comments to 27Aug25 15day.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:40:15

No Duplicates.

**Comment 181 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Bill

Last Name: McBee

Email Address: bill.mcbee@ndsoy.com

Affiliation:

Subject: NDSP comments on CARB proposed amendments.

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7516-lcfs2024-UDNdOIEiWWhWD1Ai.docx](http://www.arb.ca.gov/lists/com-attach/7516-lcfs2024-UDNdOIEiWWhWD1Ai.docx)

Original File Name: CARB Response - NDSP.docx

Date and Time Comment Was Submitted: 2024-08-27 16:41:04

No Duplicates.

**Comment 182 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Julie

Last Name: Litschewski

Email Address: julie@caleec.com

Affiliation:

Subject: Electric Vehicle Charging Association Support for Proposed Amendments to LCFS  
Regulations

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7517-lcfs2024-WjYHYlw7UXEGXwFx.pdf](http://www.arb.ca.gov/lists/com-attach/7517-lcfs2024-WjYHYlw7UXEGXwFx.pdf)

Original File Name: LCFS Proposed Amendments\_EVCA Comments\_8.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:37:12

No Duplicates.

**Comment 183 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Andrew

Last Name: Craig

Email Address: [acraig@calbioenergy.com](mailto:acraig@calbioenergy.com)

Affiliation: California Bioenergy

Subject: CalBio Comments on Aug 2024 LCFS Rulemaking

Comment:

Please see CalBio's comments on the LCFS rulemaking package  
released on 8/12/2024

Attachment: [www.arb.ca.gov/lists/com-attach/7518-lcfs2024-VzRTNAZrAjMLZFc4.pdf](http://www.arb.ca.gov/lists/com-attach/7518-lcfs2024-VzRTNAZrAjMLZFc4.pdf)

Original File Name: CalBio Comments on 8-12-2024 LCFS Rulemaking.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:33:06

No Duplicates.

**Comment 184 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Jacqueline

Last Name: Moore

Email Address: jmmoore@pmsaship.com

Affiliation:

Subject: PMSA Comments on LCFS 15-Day

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7519-lcfs2024-BXVTOFAiU2EGXwlq.pdf](http://www.arb.ca.gov/lists/com-attach/7519-lcfs2024-BXVTOFAiU2EGXwlq.pdf)

Original File Name: PMSA Comments on LCFS Amendments 08.27.2024 Final.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:48:02

No Duplicates.



**Comment 185 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Robin

Last Name: Vercruse

Email Address: robin@lcfcoalition.com

Affiliation: Low Carbon Fuels Coalition

Subject: Low Carbon Fuels Coalition Comments to 15-Day Amendments

Comment:

Attached are comments from the Low Carbon Fuels Coalition in response to the 15-Day Amendments issued on 12 Aug 2024.

Attachment: [www.arb.ca.gov/lists/com-attach/7520-lcfs2024-Uj5XMIQzBDQBWA1q.pdf](http://www.arb.ca.gov/lists/com-attach/7520-lcfs2024-Uj5XMIQzBDQBWA1q.pdf)

Original File Name: LCFC comments to CARB 15-Day Amendments 27Aug2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:49:28

No Duplicates.

**Comment 186 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Greg

Last Name: Kester

Email Address: gkester@casaweb.org

Affiliation: California Assoc of Sanitation Agencies

Subject: Comments on LCFS Program

Comment:

A second attempt to submit comments from CASA on the LCFS proposed revisions. Please let me know if this works. Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/7521-lcfs2024-VWUHOVV5UDEGN1d6.pdf](http://www.arb.ca.gov/lists/com-attach/7521-lcfs2024-VWUHOVV5UDEGN1d6.pdf)

Original File Name: 08-27-24 CASA LCFS Comment Letter\_Final.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:51:13

1 Duplicates.

**Comment 187 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Ashimi

Last Name: Patel

Email Address: [apatel@parpacific.com](mailto:apatel@parpacific.com)

Affiliation: Par Pacific Holdings, Inc.

Subject: Par Pacific Comments on the 15-Day Package\_Revised

Comment:

Please see Par Pacific's revised comments on the 15-day package in the attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/7522-lcfs2024-WipSNVQnUFwLfQFg.pdf](http://www.arb.ca.gov/lists/com-attach/7522-lcfs2024-WipSNVQnUFwLfQFg.pdf)

Original File Name: Par Pacific Comments on the 15-Day Package\_Revised.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:53:56

No Duplicates.

**Comment 188 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Thomas

Last Name: Hobby

Email Address: tom.hobby@yosemiteclean.com

Affiliation: Yosemite Clean Energy, LLC

Subject: YCE Public Comment: LCFS Amendments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7523-lcfs2024-ATNVY1JhA2QCNFdv.docx](http://www.arb.ca.gov/lists/com-attach/7523-lcfs2024-ATNVY1JhA2QCNFdv.docx)

Original File Name: 20240826 LCFS Comments to Submit-DM.v3.docx

Date and Time Comment Was Submitted: 2024-08-27 16:54:43

No Duplicates.

**Comment 189 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Sean

Last Name: Newsum

Email Address: [snewsum@airlines.org](mailto:snewsum@airlines.org)

Affiliation: Airlines for America

Subject: Airlines for America comments on LCFS Amendments

Comment:

Airlines for America(r) (A4A), the principal trade and service organization of the U.S. airline industry provides comments in the attached file regarding the Proposed Low Carbon Fuel Standard Amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/7524-lcfs2024-B2YGNAdnU18HYgFu.pdf](http://www.arb.ca.gov/lists/com-attach/7524-lcfs2024-B2YGNAdnU18HYgFu.pdf)

Original File Name: A4A Comments on Proposed LCFS Amendments - Final - 08-27-2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:49:40

No Duplicates.

**Comment 190 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Ashley

Last Name: Arax

Email Address: aarax@catf.us

Affiliation:

Subject: CATF LCFS 15-Day Comments

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/com-attach/7525-lcfs2024-WjkHYAB1UmdXDgVp.pdf](http://www.arb.ca.gov/lists/com-attach/7525-lcfs2024-WjkHYAB1UmdXDgVp.pdf)

Original File Name: CATF LCFS Comments 15 Day Changes 082724.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:55:34

No Duplicates.

**Comment 191 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Sean

Last Name: Newsum

Email Address: [snewsum@airlines.org](mailto:snewsum@airlines.org)

Affiliation: Aviation industry organizations

Subject: Aviation industry companies & associations comments on LCFS amendments

Comment:

Please find in the attached file, comments from aviation industry companies and associations regarding the LCFS amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/7526-lcfs2024-UjNXJ101VGYKeAZv.pdf](http://www.arb.ca.gov/lists/com-attach/7526-lcfs2024-UjNXJ101VGYKeAZv.pdf)

Original File Name: Aviation Industry comments on prposed LCFS amendments - Final - 08-27-2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:58:56

No Duplicates.

**Comment 192 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Jane  
Last Name: Sadler  
Email Address: jsadler@rmi.org  
Affiliation: RMI

Subject: RMI LCFS 15 Day Comments  
Comment:

Please find our full comments attached, and please do not hesitate  
to reach out with any following question or comments in return.  
Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/7527-lcfs2024-ViQCaQFpU18LYQdk.pdf](http://www.arb.ca.gov/lists/com-attach/7527-lcfs2024-ViQCaQFpU18LYQdk.pdf)

Original File Name: RMI LCFS 15 Day Comments.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:00:26

No Duplicates.



**Comment 193 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Bill

Last Name: McBee

Email Address: bill.mcbee@ndsoy.com

Affiliation:

Subject: NDSP comments on CARB proposed amendments.

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7528-lcfs2024-UzBVMIYIWWgFXFMh.pdf](http://www.arb.ca.gov/lists/com-attach/7528-lcfs2024-UzBVMIYIWWgFXFMh.pdf)

Original File Name: CARB Response - NDSP.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:41:04

No Duplicates.

**Comment 194 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Michael  
Last Name: Dolch  
Email Address: mdolch@agp.com  
Affiliation:

Subject: AGP Comments on Proposed LCFS 15-Day Changes  
Comment:

Please find the enclosed comment letter on behalf of Ag Processing  
Inc (AGP).

Attachment: [www.arb.ca.gov/lists/com-attach/7529-lcfs2024-WzpXNgFwV1sBZAlm.pdf](http://www.arb.ca.gov/lists/com-attach/7529-lcfs2024-WzpXNgFwV1sBZAlm.pdf)

Original File Name: AGP Comments on Proposed LCFS 15-Day Changes.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:23:09

No Duplicates.

**Comment 195 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Stefan

Last Name: Unnasch

Email Address: unnasch@lifecycleassociates.com

Affiliation: Life Cycle Associates

Subject: Biomass and Biogenic Carbon Accounting and Verification

Comment:

The attached report addresses issues related biomass, including biogenic carbon accounting and biomass verification. Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/7530-lcfs2024-VDcHY1MzAj0CZVA+.pdf](http://www.arb.ca.gov/lists/com-attach/7530-lcfs2024-VDcHY1MzAj0CZVA+.pdf)

Original File Name: CBalance Report\_LCFS\_comment.pdf

Date and Time Comment Was Submitted: 2024-08-27 16:56:22

No Duplicates.

**Comment 196 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Marcia

Last Name: Perin

Email Address: [marcia.perin@be8energy.com](mailto:marcia.perin@be8energy.com)

Affiliation: Be8

Subject: Be8's comments on the 15-day changes

Comment:

Attached please find Be8's comments on the LCFS 15-day changes.

Attachment: [www.arb.ca.gov/lists/com-attach/7531-lcfs2024-VzVcPwM6BAhVMFc4.pdf](http://www.arb.ca.gov/lists/com-attach/7531-lcfs2024-VzVcPwM6BAhVMFc4.pdf)

Original File Name: Be8 comments on the LCFS 08 27 24.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:19:47

No Duplicates.

**Comment 197 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Thomas

Last Name: Malecha

Email Address: tom.malecha@cgb.com

Affiliation:

Subject: Comments from CGB (Consolidated Grain & Barge)

Comment:

Please accept the attached comments from CGB in regards to CARB's request for comments for the Proposed Low Carbon Fuel Standard Amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/7532-lcfs2024-BWlXa1EJVy8Hcm0d.pdf](http://www.arb.ca.gov/lists/com-attach/7532-lcfs2024-BWlXa1EJVy8Hcm0d.pdf)

Original File Name: CGB comments to CARB on LCFS - Aug 27 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:26:15

No Duplicates.

**Comment 198 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Adam

Last Name: Browning

Email Address: [abrowning@forummobility.com](mailto:abrowning@forummobility.com)

Affiliation: Joint HD Infrastructure Providers

Subject: Joint HD Infrastructure Providers comments to LCFS 15-day language

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7533-lcfs2024-AmsFbQFmV3YGYVMM.pdf](http://www.arb.ca.gov/lists/com-attach/7533-lcfs2024-AmsFbQFmV3YGYVMM.pdf)

Original File Name: Infra Parties LCFS Comment Letter August 27 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:28:57

No Duplicates.

**Comment 199 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Jonathan

Last Name: Hirte

Email Address: jonathan.hirte@dteenergy.com

Affiliation:

Subject: DTE Vantage Comments on 15-Day Package

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7534-lcfs2024-UzdSIFw4VFgFdVQ1.pdf](http://www.arb.ca.gov/lists/com-attach/7534-lcfs2024-UzdSIFw4VFgFdVQ1.pdf)

Original File Name: DTE Vantage Comments for LCFS 15 Day Package vFINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:32:31

No Duplicates.

**Comment 200 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Veronica

Last Name: Pardo

Email Address: veronica@resourcecoalition.org

Affiliation: Resource Recovery Coalition of CA

Subject: Comments on the Proposed LCFS Amendments

Comment:

The Resource Recovery Coalition of California is grateful for the opportunity to submit these comments.

Attachment: [www.arb.ca.gov/lists/com-attach/7535-lcfs2024-ViZdKVA+WXoEbVMg.pdf](http://www.arb.ca.gov/lists/com-attach/7535-lcfs2024-ViZdKVA+WXoEbVMg.pdf)

Original File Name: Proposed Low Carbon Fuel Standard Amendments 08.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:37:16

No Duplicates.



**Comment 201 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

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:

Comments on Proposed 15-day Changes, Proposed Amendments to the Low  
Carbon Fuel Standard (LCFS) Regulation.  
The Climate Center

Attachment: [www.arb.ca.gov/lists/com-attach/7536-lcfs2024-VTQCcVM1UHYCdwB0.pdf](http://www.arb.ca.gov/lists/com-attach/7536-lcfs2024-VTQCcVM1UHYCdwB0.pdf)

Original File Name: August TCC letter LCFS 2024 .pdf

Date and Time Comment Was Submitted: 2024-08-27 17:36:24

No Duplicates.

**Comment 202 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Jamie

Last Name: Yates

Email Address: jyates@pacificenvironment.org

Affiliation:

Subject: Pacific Environment Comments on 15 Day Amendments

Comment:

Thank you for the opportunity to comment. Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7537-lcfs2024-AXECYQNdAj0Kbwlv.pdf](http://www.arb.ca.gov/lists/com-attach/7537-lcfs2024-AXECYQNdAj0Kbwlv.pdf)

Original File Name: PE LCFS 15day comment letter August 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:39:29

No Duplicates.

**Comment 203 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Evan

Last Name: Neyland

Email Address: [evan.neyland@chargepoint.com](mailto:evan.neyland@chargepoint.com)

Affiliation: ChargePoint

Subject: ChargePoint comments on Aug 24 15-Day Proposal

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7538-lcfs2024-BmVRPwZmUHEEZQVg.pdf](http://www.arb.ca.gov/lists/com-attach/7538-lcfs2024-BmVRPwZmUHEEZQVg.pdf)

Original File Name: ChargePoint Comments to August 2024 15-Day LCFS Proposal.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:42:19

No Duplicates.

**Comment 204 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Alexis

Last Name: Moch

Email Address: amoch@prologis.com

Affiliation: Prologis

Subject: Comments on 15-Day Changes to the Proposed Low Carbon Fuel Standard

Comment:

Please see attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/7539-lcfs2024-VDdSNVMgUmMHXgBi.pdf](http://www.arb.ca.gov/lists/com-attach/7539-lcfs2024-VDdSNVMgUmMHXgBi.pdf)

Original File Name: CARB biomethane to electricity LCFS letter\_8.27.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:45:54

No Duplicates.

**Comment 205 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Bryan  
Last Name: Sievers  
Email Address: bsievers@roesleinae.com  
Affiliation: Roeslein Alternative Energy

Subject: RAE Comments on the LCFS 15-Day Changes  
Comment:

Please see Roeslein Alternative Energy's attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/7540-lcfs2024-UCJXMFQwV1sDNAg9.pdf](http://www.arb.ca.gov/lists/com-attach/7540-lcfs2024-UCJXMFQwV1sDNAg9.pdf)

Original File Name: RAE 15-Day Comment Letter to CARB\_08272024\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:35:38

No Duplicates.

**Comment 206 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Bryan

Last Name: Sievers

Email Address: bsievers@roesleinae.com

Affiliation: Roeslein Alternative Energy

Subject: RAE Comments on 15-Day Changes including Livestock Offset Protocol

Comment:

Please see attached comments from Roeslein Alternative Energy which includes comments regarding the Livestock Offset Protocol and inclusion of beef cattle manure.

Attachment: [www.arb.ca.gov/lists/com-attach/7541-lcfs2024-B3UAZwRgVFgKPQUw.pdf](http://www.arb.ca.gov/lists/com-attach/7541-lcfs2024-B3UAZwRgVFgKPQUw.pdf)

Original File Name: RAE 15-Day Comment Letter\_LOP\_08272024\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:52:17

No Duplicates.

**Comment 207 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

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 on the LCFS 15-day package attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7542-lcfs2024-WzlRIgNsBzNRMgFe.pdf](http://www.arb.ca.gov/lists/com-attach/7542-lcfs2024-WzlRIgNsBzNRMgFe.pdf)

Original File Name: Bunge Comments on LCFS 15-day Package.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:52:35

No Duplicates.

**Comment 208 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Bang

Last Name: Phung

Email Address: bang.phung@ladwp.com

Affiliation: Los Angeles DWP

Subject: LADWP Comment on LCFS 15-Day Changes

Comment:

Please see attached for LADWP's comments on the proposed  
modifications to the LCFS amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/7543-lcfs2024-AGwGYQFkByMDdVMM.pdf](http://www.arb.ca.gov/lists/com-attach/7543-lcfs2024-AGwGYQFkByMDdVMM.pdf)

Original File Name: LADWP Comments on 2024 LCFS Proposed Amendments 8.27.2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 18:00:01

No Duplicates.



**Comment 209 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Ryan

Last Name: Kenny

Email Address: ryan.kenny@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: LCFS: Clean Energy Comments for 15-Day Package

Comment:

Please find attached a letter from Clean Energy commenting on the  
15-Day Package for the LCFS.

Attachment: [www.arb.ca.gov/lists/com-attach/7544-lcfs2024-Wy5cYgQwVyxQM0d.pdf](http://www.arb.ca.gov/lists/com-attach/7544-lcfs2024-Wy5cYgQwVyxQM0d.pdf)

Original File Name: CLNE LCFS Comment Letter August 2024 FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:59:41

No Duplicates.

**Comment 210 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Craig

Last Name: Moyer

Email Address: cmoyer@manatt.com

Affiliation:

Subject: Comments on LCFS Proposed Amendments

Comment:

Please see the attached comments on behalf of the Western  
Independent Refiners Association regarding the Proposed Amendments  
to the Low Carbon Fuel Standard. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/7545-lcfs2024-UmAGMAEyVzAKIVJi.pdf](http://www.arb.ca.gov/lists/com-attach/7545-lcfs2024-UmAGMAEyVzAKIVJi.pdf)

Original File Name: 2024-08-27 WIRA Comment Letter on LCFS Proposed Amendments.pdf

Date and Time Comment Was Submitted: 2024-08-27 17:30:33

No Duplicates.

**Comment 211 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Tyler

Last Name: Lobdell

Email Address: TLobdell@fwwatch.org

Affiliation: Food & Water Watch

Subject: Comments on 15-day changes to LCFS proposed amendments

Comment:

See attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/7546-lcfs2024-ATMFMwQ3UTZQeFNj.pdf](http://www.arb.ca.gov/lists/com-attach/7546-lcfs2024-ATMFMwQ3UTZQeFNj.pdf)

Original File Name: 2024.08.27\_Coalition 15-Day Comments\_for filing.pdf

Date and Time Comment Was Submitted: 2024-08-27 18:18:52

No Duplicates.

**Comment 212 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Cassandra

Last Name: Farrant

Email Address: cfarrant@ampamericas.com

Affiliation:

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/7547-lcfs2024-UDFcN1YnWFQLfVcl.pdf](http://www.arb.ca.gov/lists/com-attach/7547-lcfs2024-UDFcN1YnWFQLfVcl.pdf)

Original File Name: Amp Proposed LCFS 15-Day Admendments Comment Letter.pdf

Date and Time Comment Was Submitted: 2024-08-27 18:25:09

No Duplicates.

**Comment 213 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Dr. Rina

Last Name: Singh

Email Address: rina@altfuelchem.org

Affiliation: Alternative Fues & Chemicals Coalition

Subject: Comments to 15-Day LCFS Amendments

Comment:

This is Dr. Rina Singh, we are submitting comments for the 15-Day  
LCFS Amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/7548-lcfs2024-AWAHZwNhBzcAWVc0.pdf](http://www.arb.ca.gov/lists/com-attach/7548-lcfs2024-AWAHZwNhBzcAWVc0.pdf)

Original File Name: AFCC Comments to CARB LCFS 15-Day Notice August 27 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 18:32:24

No Duplicates.

**Comment 214 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Melinda

Last Name: Palmer

Email Address: mpalmer@kernenergy.com

Affiliation: Kern Energy

Subject: Kern Energy LCFS Comments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7549-lcfs2024-Vj0HZFEiUm8AWVcy.pdf](http://www.arb.ca.gov/lists/com-attach/7549-lcfs2024-Vj0HZFEiUm8AWVcy.pdf)

Original File Name: Kern Energy LCFS Comments August 27 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 18:43:02

No Duplicates.

## **Comment 215 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name:

Last Name: SAF stakeholder grou

Email Address: emily.carlton@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, Biotechnology Innovation Organization, Blue Arrow, California Ethanol and Power, Clean Fuels Alliance Comstock Fuels, Darling Ingredients, Green Plains, LanzaJet, LanzaTech, Montana Renewables, Raizen, the Renewable Fuels Association, SkyNRG, Sugar Valley Energy, and XCF Global Capital.

We appreciate the opportunity to comment. Please do not hesitate to reach out with any questions.

Attachment: [www.arb.ca.gov/lists/com-attach/7550-lcfs2024-WyhCAiI9VWP1wm0d.zip](http://www.arb.ca.gov/lists/com-attach/7550-lcfs2024-WyhCAiI9VWP1wm0d.zip)

Original File Name: SAF Group Comments\_ CARB 15 Day LCFS Proposal\_2024.08.27\_final.zip

Date and Time Comment Was Submitted: 2024-08-27 18:28:34

No Duplicates.

**Comment 216 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Evan

Last Name: Neyland

Email Address: [evan.neyland@chargepoint.com](mailto:evan.neyland@chargepoint.com)

Affiliation: ChargePoint

Subject: ChargePoint Comments on Aug 24 15-Day LCFS Proposal

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7551-lcfs2024-UjEBb1Y2V3YDYlQx.pdf](http://www.arb.ca.gov/lists/com-attach/7551-lcfs2024-UjEBb1Y2V3YDYlQx.pdf)

Original File Name: ChargePoint Comments to August 2024 15-Day LCFS Proposal.pdf

Date and Time Comment Was Submitted: 2024-08-27 18:57:27

No Duplicates.



**Comment 217 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Gary

Last Name: Hughes

Email Address: garyhughes.bfw@gmail.com

Affiliation: Biofuelwatch

Subject: Halt Deforestation-Driving Soy Biofuels Before It Is Too Late

Comment:

See attached letter as comment.

Attachment: [www.arb.ca.gov/lists/com-attach/7552-lcfs2024-BWdQP1U7ADVRilcy.pdf](http://www.arb.ca.gov/lists/com-attach/7552-lcfs2024-BWdQP1U7ADVRilcy.pdf)

Original File Name: Biofuelwatch\_LCFSRulemaking\_Aug2024Amendments.pdf

Date and Time Comment Was Submitted: 2024-08-27 19:00:01

No Duplicates.

**Comment 218 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Joseph

Last Name: Jobe

Email Address: joe@rockhouse.us

Affiliation: Sustainable Advanced Biofuel Refiners

Subject: Comments to the Proposed LCFS Amendments

Comment:

Please see the attached comments from the Sustainable Advanced  
Biofuel Refiners (SABR) Coalition.

Attachment: [www.arb.ca.gov/lists/com-attach/7553-lcfs2024-W2MGLVNgVDBWfQY0.pdf](http://www.arb.ca.gov/lists/com-attach/7553-lcfs2024-W2MGLVNgVDBWfQY0.pdf)

Original File Name: 8-27-24 SABR comments to CARB.pdf

Date and Time Comment Was Submitted: 2024-08-27 19:01:44

No Duplicates.

## **Comment 219 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Nikita

Last Name: Pavlenko

Email Address: n.pavlenko@theicct.org

Affiliation: ICCT

Subject: ICCT Comments on August 15-day LCFS Changes

Comment:

These comments are 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 15-day changes to the 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. 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, restoring stable credit prices, and maintaining the environmental integrity of the program.

Attachment: [www.arb.ca.gov/lists/com-attach/7554-lcfs2024-Bm8BZAZkAyQCWwBj.pdf](http://www.arb.ca.gov/lists/com-attach/7554-lcfs2024-Bm8BZAZkAyQCWwBj.pdf)

Original File Name: ICCT comments on 15-day LCFS package\_Clean.pdf

Date and Time Comment Was Submitted: 2024-08-27 18:28:52

No Duplicates.

**Comment 220 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Keri

Last Name: Bevel

Email Address: kbevel@anewclimate.com

Affiliation: Anew Climate

Subject: Anew Climate Comments on CARB's Proposed 15-Day Amendments to the Low Carbon Fuel Standard

Comment:

Please find Anew Climate's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7555-lcfs2024-VzYBaVE1WX0FXAhr.pdf](http://www.arb.ca.gov/lists/com-attach/7555-lcfs2024-VzYBaVE1WX0FXAhr.pdf)

Original File Name: Anew Comments LCFS 15-Day Notice (27-Aug\_Submittal).pdf

Date and Time Comment Was Submitted: 2024-08-27 19:10:05

No Duplicates.

**Comment 221 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Gracyna

Last Name: Mohabir

Email Address: gracyna@envirovoters.org

Affiliation: California Environmental Voters

Subject: Comments on LCFS 15 Day Changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7556-lcfs2024-UzYGblAnBz0GcgJt.pdf](http://www.arb.ca.gov/lists/com-attach/7556-lcfs2024-UzYGblAnBz0GcgJt.pdf)

Original File Name: EnviroVoters LCFS 15-Day Changes Comment Letter 8-27-24.pdf

Date and Time Comment Was Submitted: 2024-08-27 19:14:41

No Duplicates.

**Comment 222 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Sasan

Last Name: Saadat

Email Address: ssaadat@earthjustice.org

Affiliation: Earthjustice

Subject: Earthjustice Comments on 15-Day Change Proposal

Comment:

Please find attached our comments on the amended LCFS proposal, as well as an appendix including details from a multi-stakeholder workshop on labor, academic, and public interest groups desired reforms for the program.

Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/7557-lcfs2024-VmRUYgQ3WT4LIa4.pdf](http://www.arb.ca.gov/lists/com-attach/7557-lcfs2024-VmRUYgQ3WT4LIa4.pdf)

Original File Name: 2024-0827 Earthjustice Comments on LCFS 15-Day Changes.pdf

Date and Time Comment Was Submitted: 2024-08-27 19:13:49

No Duplicates.

**Comment 223 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Alchemy

Last Name: Graham

Email Address: [alchemy@caltransit.org](mailto:alchemy@caltransit.org)

Affiliation: California Transit Association

Subject: California Transit Association - Letter on Proposed LCFS Amendments

Comment:

Comment letter attached here.

Attachment: [www.arb.ca.gov/lists/com-attach/7558-lcfs2024-AmEGdFAwUV1QOgNg.pdf](http://www.arb.ca.gov/lists/com-attach/7558-lcfs2024-AmEGdFAwUV1QOgNg.pdf)

Original File Name: CTA LCFS Amendments Comment Letter - 8-27-24.pdf

Date and Time Comment Was Submitted: 2024-08-27 19:19:42

No Duplicates.

**Comment 224 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: Pacific Gas & Electric

Subject: PG&E Comments on LCFS 15-Day Changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7559-lcfs2024-UT0HYgRjVHQKU1dm.pdf](http://www.arb.ca.gov/lists/com-attach/7559-lcfs2024-UT0HYgRjVHQKU1dm.pdf)

Original File Name: LCFS\_15-Day Comments\_PGE\_08-27-2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 19:26:34

No Duplicates.



## **Comment 225 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Patricia

Last Name: Seffens

Email Address: Seffe5@att.net

Affiliation:

Subject: Low Carbon Fuel Standard

Comment:

The proposed draft continues to provide credits for industrial dairy "biogas." This financial support continues to incentivize the expansion of large-scale factory dairy farms, causing serious harm to the health of surrounding communities, increasing the greenhouse gases and pollution generated by the production of feed for cows confined to barns; concentrated methane emitted by pools of waste; the inevitable leakage of methane during storage and transportation; and greenhouse gas emissions produced by combustion of the product. We urge CARB to phase out support for biomethane as rapidly as possible.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-27 19:44:47

No Duplicates.

**Comment 226 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Bradley

Last Name: Wilson

Email Address: bwilson@westerniowaenergy.com

Affiliation: Western Iowa Energy, LLC

Subject: Western Iowa Energy's comments for proposed LCFS changes

Comment:

Please see comment in the attachment

Attachment: [www.arb.ca.gov/lists/com-attach/7562-lcfs2024-UTIGYVwvWWhWDwcq.docx](http://www.arb.ca.gov/lists/com-attach/7562-lcfs2024-UTIGYVwvWWhWDwcq.docx)

Original File Name: CARB - WIE Comment Letter 08272024.docx

Date and Time Comment Was Submitted: 2024-08-27 19:42:59

No Duplicates.

**Comment 227 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Ben  
Last Name: Brint  
Email Address: policy@swtchenergy.com  
Affiliation: SWTCH

Subject: SWTCH Comments on Proposed 15-Day Amendments to the LCFS Regulation - EV  
Charging at MFRs  
Comment:

Please find attached SWTCH's comments on the proposed 15-Day  
Amendments to the LCFS Regulation. SWTCH's comments focus on D3:  
Sections 95483(c)(1) and 95483(c)(2). Fuel Reporting Entities for  
Residential Electrical Vehicle Charging.

Attachment: [www.arb.ca.gov/lists/com-attach/7563-lcfs2024-W2lSZF1uVjEELFVl.pdf](http://www.arb.ca.gov/lists/com-attach/7563-lcfs2024-W2lSZF1uVjEELFVl.pdf)

Original File Name: 2024.08.27 SWTCH Comments\_CARB 15-Day Proposed Amendments to  
the Low Carbon Fuel Standard Regulation.pdf

Date and Time Comment Was Submitted: 2024-08-27 19:57:26

No Duplicates.

**Comment 228 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Oscar  
Last Name: Garcia  
Email Address: oscar.garcia@neste.com  
Affiliation: Neste

Subject: Neste Comments on August 2024 15-day Package for LCFS Rulemaking  
Comment:

Neste is pleased to submit the attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/7564-lcfs2024-AG4HZFUnACcGZQNc.pdf](http://www.arb.ca.gov/lists/com-attach/7564-lcfs2024-AG4HZFUnACcGZQNc.pdf)

Original File Name: Neste\_August 12 LCFS 15-day Package Comments\_August 27 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 19:59:50

No Duplicates.

**Comment 229 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Gary

Last Name: Grimes

Email Address: ggrimes@worldenergy.net

Affiliation: World Energy

Subject: Tier 1 Hydroprocessed Ester and Fatty Acids Fuel Calculator

Comment:

Attached are comments from World Energy on the Tier 1 HEFA Calculator. Thank you for developing these calculators to standardize and simplify reporting and CO2e calculations.

Please feel free to call to discuss our comments further.

Best regards,  
Gary Grimes

Attachment: [www.arb.ca.gov/lists/com-attach/7565-lcfs2024-Wi4GMVQKAjkKaQJk.docx](http://www.arb.ca.gov/lists/com-attach/7565-lcfs2024-Wi4GMVQKAjkKaQJk.docx)

Original File Name: T1 HEFA Calculator Comments.docx

Date and Time Comment Was Submitted: 2024-08-27 19:21:46

No Duplicates.

**Comment 230 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Joshua  
Last Name: Stolaroff  
Email Address: josh@motehydrogen.com  
Affiliation: Mote, Inc.

Subject: Comments on LCFS2024  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7566-lcfs2024-UT1XNFYjBSIEZwJw.pdf](http://www.arb.ca.gov/lists/com-attach/7566-lcfs2024-UT1XNFYjBSIEZwJw.pdf)

Original File Name: Letter to CARB on LCFS changes 08-27-2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 19:18:02

No Duplicates.

**Comment 231 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Steve

Last Name: Compton

Email Address: [steve@sevanabioenergy.com](mailto:steve@sevanabioenergy.com)

Affiliation: Sevana Bioenergy

Subject: LCFS 15 Day Comments

Comment:

Please find our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7567-lcfs2024-WilSMQF2BTdQOARl.pdf](http://www.arb.ca.gov/lists/com-attach/7567-lcfs2024-WilSMQF2BTdQOARl.pdf)

Original File Name: Sevana CARB\_Comments 08.27.2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 20:17:04

No Duplicates.

## **Comment 232 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Ruben  
Last Name: Zaragoza  
Email Address: Ruben.zaragoza@wnco.com  
Affiliation: Southwest Airlines

Subject: Support for California Air Resources Board Proposal to Retain Jet Fuel Exemption in LCFS

Comment:

Clerks' Office  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

Re: Support for California Air Resources Board Proposal to Retain Jet Fuel Exemption in Low Carbon Fuel Standard Program

In response to the revised Proposed Low Carbon Fuel Standard Amendments posted on August 12th, 2024, we are writing to share our support for the recent California Air Resources Board (CARB) proposal to retain the jet fuel exemption under its Low Carb Fuel Standard (LCFS) Program. Southwest Airlines supports the withdrawal of the proposal to eliminate the jet fuel exemption and retain the existing opt-in approach for SAF under the CARB LCFS Program.

Southwest Airlines is taking action towards addressing its carbon emissions and achieving its goal of net zero carbon emissions by 2050, and transitioning to SAF is core to these efforts. We have long recognized that scaling up the supply of SAF and achieving net-zero carbon emissions by 2050 can only happen by working collaboratively with governments and other stakeholders across sectors. Achieving this ambition for SAF will require new and additional policy incentives, streamlined permitting processes, and close collaboration among governments, the aviation industry, the fuels industry, environmental organizations and others.

In its April 10th, 2024, workshop, CARB re-stated that a principle objective of its regulatory proposal is to "Increase the use of alternative jet fuel in the State". We share that objective as reflected in our company goal to replace 10% of total jet fuel consumption with SAF by 2030 and our US airline industry support for the US government SAF Grand Challenge. Southwest Airlines and our fellow airlines have clearly demonstrated a strong, enduring market signal for affordable SAF. The challenge remains supply of affordable SAF, not the absence of a market signal by airlines. We strongly believe that maintaining the existing exemption for jet fuel along with the opt-in model for SAF provides a strong foundation to achieve our mutual objectives.

Our mutual interest is to increase SAF production, availability, and use, and the most effective way to accomplish this is to



continue the positive, collaborative approach represented by the existing "opt-in" mechanism developed by CARB and the aviation community. We support CARB's decision to withdraw the proposal to remove the exemption for jet fuel for intrastate flights, preserve the existing opt-in approach for SAF. We look forward to the opportunity to work with CARB and other stakeholders across the SAF ecosystem to explore solutions which build on the existing opt-in model of the LCFS Program. We recommend that CARB establish a joint CARB-industry working group with stakeholders across the emerging SAF ecosystem to explore alternative policy and voluntary proposals to rapidly increase SAF production, availability and use in California. We look forward to working with CARB on such measures to accelerate SAF deployment.

Sincerely,

Ruben Zaragoza  
State & Local Affairs Director  
Southwest Airlines

Attachment:

Original File Name: Southwest Airlines letter on Revised CARB LCFS proposal 08-27-2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 20:07:51

No Duplicates.

**Comment 233 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Tadashi

Last Name: Ogitsu

Email Address: ogitsu@mac.com

Affiliation: Lawrence Livermore National Laboratory

Subject: Comments on LCFS

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7569-lcfs2024-Uz8GY1QzAyMEXQhr.pdf](http://www.arb.ca.gov/lists/com-attach/7569-lcfs2024-Uz8GY1QzAyMEXQhr.pdf)

Original File Name: LCFS comment.pdf

Date and Time Comment Was Submitted: 2024-08-27 20:18:56

No Duplicates.

**Comment 234 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Sean

Last Name: Lock

Email Address: sean@monarchbio.com

Affiliation:

Subject: Monarch Bioenergy LLC comments on CARB LCFS 15 day changes

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/7570-lcfs2024-VzpWP1Y5BDYHcwVm.pdf](http://www.arb.ca.gov/lists/com-attach/7570-lcfs2024-VzpWP1Y5BDYHcwVm.pdf)

Original File Name: Monarch comments on CARB LCFS Amendments 8.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 20:20:29

No Duplicates.

**Comment 235 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

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 15-Day Changes to  
LCFS Amendments

Comment:

Please see our attached comments on CARB's proposed modifications  
(15-day changes) to the California Low Carbon Fuel Standard  
amendments

Thank you for your consideration.

Attachment: [www.arb.ca.gov/lists/com-attach/7571-lcfs2024-Uz5TOI0yVnECZQhm.pdf](http://www.arb.ca.gov/lists/com-attach/7571-lcfs2024-Uz5TOI0yVnECZQhm.pdf)

Original File Name: Montana Renewables, LLC - Public Comments (8.27.2024).pdf

Date and Time Comment Was Submitted: 2024-08-27 20:34:26

No Duplicates.

**Comment 236 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Scott

Last Name: Hedderich

Email Address: scott.hedderich@nuseed.com

Affiliation: Nuseed

Subject: Proposed 15 day changes to the LCFS program

Comment:

please see the enclosed comments on behalf of Nuseed, Americas

Attachment: [www.arb.ca.gov/lists/com-attach/7572-lcfs2024-VmcFNIEPBDMCZVcu.pdf](http://www.arb.ca.gov/lists/com-attach/7572-lcfs2024-VmcFNIEPBDMCZVcu.pdf)

Original File Name: 15 day change final.pdf

Date and Time Comment Was Submitted: 2024-08-27 20:50:29

No Duplicates.

**Comment 237 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Jessi

Last Name: Davis

Email Address: jdavis6@socalgas.com

Affiliation:

Subject: SoCalGas & SDGE Comment Letter on CARB LCFS 15 Day Changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7573-lcfs2024-UyAHbgdlUGIGbFUy.pdf](http://www.arb.ca.gov/lists/com-attach/7573-lcfs2024-UyAHbgdlUGIGbFUy.pdf)

Original File Name: SoCalGas & SDGE Comment Letter on CARB LCFS 15 Day Changes.pdf

Date and Time Comment Was Submitted: 2024-08-27 21:05:26

No Duplicates.

**Comment 238 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Elizabeth

Last Name: Burns-Thompson

Email Address: Elizabeth.Thompson@landus.ag

Affiliation: Landus Cooperative

Subject: CARB Comments Re: Landus Cooperative

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7574-lcfs2024-UT1RNgbvUWYCCqD0.docx](http://www.arb.ca.gov/lists/com-attach/7574-lcfs2024-UT1RNgbvUWYCCqD0.docx)

Original File Name: Landus Comments to CARB 08272024.docx

Date and Time Comment Was Submitted: 2024-08-27 21:05:16

No Duplicates.

## **Comment 239 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Charles

Last Name: Davidson

Email Address: charlesdavidson@me.com

Affiliation: Sunflower Alliance

Subject: Concerns Regarding CARB's LCFS Policies on Renewable Diesel and SAF and the 20% Cap

Comment:

Subject: Concerns Regarding CARB's LCFS Policies on Renewable Diesel and Sustainable Aviation Fuel and the 20% Cap

Dear CARB Executive Officer,

Although the California Air Resources Board's (CARB's) Low Carbon Fuel Standard (LCFS) amendments are moving in the right direction, I am writing to express my concern regarding the potential limits of the stringency and environmental effectiveness of "20% cap" amended policy on renewable diesel when using virgin food oils, such as soybean and canola oil feedstock.

The following are my specific points on the 20% cap, that is followed in the postscript to this letter containing excerpts from my Tier 2 Comments to CARB:

- The proposed 20% cap even for a single California refiner, raises significant concerns, regarding whether this cap applies to individual refineries or across multiple facilities operated by the same company. If it applies company-wide, this could allow companies with multiple refineries in California to effectively double their use of virgin food oils, leading to a substantial increase in the one company's use of soy or canola oils for renewable diesel production.
- CARB's 20% cap on virgin food oils is not considering the possibility that despite a potential future cap at the two existing California renewable diesel refineries, there could be an overall increase in the total statewide growth of renewable diesel production using soy and canola oil, because renewable diesel can be produced at 15 major petroleum refineries in California, not merely two, as currently.
- The "per company" 20% cap on virgin soy and canola oil feedstock for renewable diesel production does not account for the same refinery's (potential) simultaneous production of Sustainable Aviation Fuel (SAF) using the same soy and canola oil feedstock, thus increasing the refinery's total cumulative use of food-based feedstocks.
- The 20% cap does not place any pressure (or requirement) on the refineries to substitute any portion of their existing fossil fuel-produced hydrogen with green hydrogen (made, instead, using



solar-powered hydrolysis).

- The arbitrary 20% cap does not take into account the actual embedded CO2 in the farm-to-wheel lifecycle of renewable diesel (or SAF) produced from virgin food oil versus renewable diesel (or SAF) produced from waste food oils, fats and greases.
- The 20% cap amendment for soy and canola oil feedstock is not applicable for companies already certified before the amendment takes effect (and where more than 20% of their reported biodiesel and renewable diesel in 2023 was already derived from virgin soybean or canola oil), the new provision would take effect on January 1, 2028, to allow time for feedstock supply contracts to be adjusted.
- The Environmental Impact Report for the world's two largest renewable diesel projects revealed that the refineries availability of high-GHG natural gas-derived hydrogen is more rate limiting than the availability of the virgin food oil stock itself.
- California already uses 47% of all soy grown for biodiesel and renewable diesel, combined, while waste lipid feedstock supplies are expected to be constrained, indefinitely, so that the amount of total virgin food oil used will be larger than waste food oils.(Soybean oil rapidly gaining ground as renewable diesel feedstock. Successful Farming. Chuck Abbot (2023) <https://www.agriculture.com/soybean-oil-rapidly-gaining-ground-as-renewable-diesel-feedstock-8419071>)

Thank you for considering my concerns.

Sincerely,  
Charles Davidson  
Hercules, CA  
charlesdavidson@me.com

PS: ATTACHED:

See attachment for Post Script for accompanying Tier 2 Comments on the LCFS regarding renewable diesel (that are relevant to my comments on the proposed LCFS amendments):

The Unsustainability of Virgin Food Oil-Based Renewable Diesel Biofuels: Questions for the California Air Resources Board. Charles Davidson. (6/2024) charlesdavidson@me.com

Introduction...

Attachment: [www.arb.ca.gov/lists/com-attach/7575-lcfs2024-WjkFbFQ7BTULaFQm.docx](http://www.arb.ca.gov/lists/com-attach/7575-lcfs2024-WjkFbFQ7BTULaFQm.docx)

Original File Name: Concerns Regarding CARB's LCFS Policies Renewable Diesel and Sustainable Aviation Fuel and the 20% Cap Amendment Dear CARB Executive Officer \*\*\*%22%22.docx

Date and Time Comment Was Submitted: 2024-08-27 21:05:05

No Duplicates.

**Comment 240 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Lauren

Last Name: Gallagher

Email Address: lgallagher@cbeval.org

Affiliation:

Subject: Comment on the Proposed Modifications Low Carbon Fuel Standard Regulation  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7576-lcfs2024-VzRRNQBkVlpVPwZl.pdf](http://www.arb.ca.gov/lists/com-attach/7576-lcfs2024-VzRRNQBkVlpVPwZl.pdf)

Original File Name: CBE LCFS 15 Day Changes Comment 8.27.24.pdf

Date and Time Comment Was Submitted: 2024-08-27 21:28:37

No Duplicates.

**Comment 241 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Doug  
Last Name: VanOrnum  
Email Address: info@wte.llc  
Affiliation: WTE, LLC

Subject: Comments by WTE, LLC on LCFS Rulemaking 2024  
Comment:

Please see comment letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7577-lcfs2024-VyAGdF05WVUDZIU6.pdf](http://www.arb.ca.gov/lists/com-attach/7577-lcfs2024-VyAGdF05WVUDZIU6.pdf)

Original File Name: WTE Comment Letter on 15-Day CARB Comment Period 082724 sig.pdf

Date and Time Comment Was Submitted: 2024-08-27 21:30:06

No Duplicates.

**Comment 242 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Amanda

Last Name: Parsons DeRosier

Email Address: Amanda.DeRosier@gceholdings.com

Affiliation: Global Clean Energy

Subject: Global Clean Energy's Comments on the Proposed 15-Day Changes to the Low Carbon Fuel Standard

Comment:

Comments are attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7578-lcfs2024-UTZQNVw4UmIDalA9.pdf](http://www.arb.ca.gov/lists/com-attach/7578-lcfs2024-UTZQNVw4UmIDalA9.pdf)

Original File Name: GCECommentsLCFS.Final.2024.8.27.pdf

Date and Time Comment Was Submitted: 2024-08-27 21:30:27

No Duplicates.

**Comment 243 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: John

Last Name: Thornton

Email Address: john@CleanFuture.us

Affiliation: CleanFuture, Inc.

Subject: CleanFuture comments on proposed LCFS amendments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7579-lcfs2024-VTYBa1E1UGIGbgFn.pdf](http://www.arb.ca.gov/lists/com-attach/7579-lcfs2024-VTYBa1E1UGIGbgFn.pdf)

Original File Name: CleanFuture Comment RE LCFS 15-day rules proposed Aug 12 2024.pdf

Date and Time Comment Was Submitted: 2024-08-27 22:17:35

No Duplicates.

**Comment 244 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Pam

Last Name: Brigg McKown

Email Address: pambrimck@gmail.com

Affiliation: Climate Action California

Subject: Comments on seed oil biomass-based diesel

Comment:

Please see the attached pdf.

Attachment: [www.arb.ca.gov/lists/com-attach/7580-lcfs2024-BWIXMlw7VHQEXVdm.pdf](http://www.arb.ca.gov/lists/com-attach/7580-lcfs2024-BWIXMlw7VHQEXVdm.pdf)

Original File Name: LCFS 15-day review.pdf

Date and Time Comment Was Submitted: 2024-08-27 22:33:08

No Duplicates.

**Comment 245 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Mikhael

Last Name: Skvarla

Email Address: mik@calobby.com

Affiliation:

Subject: H2 Comments on 15-day Changes to the Proposed LCFS Regulation

Comment:

Please see the attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7581-lcfs2024-UDhTZ1cJVyKLUGFt.pdf](http://www.arb.ca.gov/lists/com-attach/7581-lcfs2024-UDhTZ1cJVyKLUGFt.pdf)

Original File Name: H2 - LCFS 15-day Comments\_final.pdf

Date and Time Comment Was Submitted: 2024-08-27 22:38:41

No Duplicates.

**Comment 246 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Henry

Last Name: Stern

Email Address: [henry.stern@sen.ca.gov](mailto:henry.stern@sen.ca.gov)

Affiliation:

Subject: California Legislators Concerns with Decision to Exempt Aviation Jet Fuel  
Comment:

See attached letter from California legislators who are concerned with the recent decision in the 15-day proposed amendments to continue the aviation jet fuel exemption. The legislators signed on advocate for including all jet fuel, combusted over and in California, as a deficit generator.

Attachment: [www.arb.ca.gov/lists/com-attach/7582-lcfs2024-VTISMQRiBT8HclI+.pdf](http://www.arb.ca.gov/lists/com-attach/7582-lcfs2024-VTISMQRiBT8HclI+.pdf)

Original File Name: Legislative Signon Ltr - Aug 2024 CARB LCFS Jet Fuel\_final.pdf

Date and Time Comment Was Submitted: 2024-08-27 22:39:49

No Duplicates.



## **Comment 247 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-1.**

First Name: Ravi  
Last Name: Sekhon  
Email Address: rsekhon@centerlinelogistics.com  
Affiliation: Centerline Logistics

Subject: Comments on LCFS regulations amendment  
Comment:

Ravi Sekhon  
rsekhon@centerlinelogistics.com  
(206) 550-7659

August 27, 2024

California Air Resources Board (CARB)  
1001 I Street  
Sacramento, CA 95814

Subject: Support for Including Green Methanol as a Marine Fuel in the LCFS

Dear California Air Resources Board Members,

I am submitting this letter in support of including green methanol as a marine fuel in the Low Carbon Fuel Standard (LCFS). I believe that CARB should actively promote the increased production, sale, and utilization of green methanol not only to lower carbon emissions but also to enhance air quality in our communities.

Green methanol offers significant environmental benefits when compared to conventional marine fuels like diesel. It can reduce carbon dioxide emissions by as much as 95%, cut nitrogen oxide emissions by up to 80%, and completely eliminate emissions of sulfur oxides and particulate matter. These substantial reductions make green methanol a cleaner and more sustainable option for marine transportation.

One of the major advantages of green methanol is that the existing infrastructure in California can handle this fuel. Storage tanks currently used for traditional marine fuels can be repurposed to store green methanol, and barges used to transport conventional bunker fuels within the ports can similarly be adapted for green methanol. This flexibility reduces the time and cost associated with transitioning to green methanol, as it avoids the need for completely new infrastructure. In contrast, other zero-carbon or low-carbon marine fuels that are being considered would require the construction of entirely new facilities and equipment, which would take years to permit and build.

Amending the LCFS regulations to permit low-carbon-intensity (CI) green methanol to generate credits when used in specific applications, such as marine transportation, would create incentives for its adoption. This change would encourage its use in

place of traditional fossil fuels, ultimately helping to decrease overall emissions in these sectors.

Such a change aligns perfectly with CARB's dual objectives of improving local air quality and tackling the global challenge of climate change. The growing demand for green methanol in various transportation sectors, particularly in the maritime industry, underscores its potential. Many major transportation companies are transitioning their fleets to run on green methanol, with numerous vessels expected to call on California's ports. Therefore, fostering the production and use of green methanol within the state is of critical importance.

This initiative also complements efforts by California's port authorities to address emissions from the marine transportation sector. For example, the San Pedro Bay Ports Clean Air Action Plan (CAAP), adopted in 2006, outlines a comprehensive strategy to reduce pollution from ocean-going vessels and other port-related sources.

As CARB acknowledged in the 2022 Climate Scoping Plan, marine transportation is a challenging sector to decarbonize. Continued support for low-carbon liquid fuels is essential as the industry transitions away from fossil fuels. One effective way to maintain this support would be to amend the LCFS regulations to include green methanol as an optional fuel for marine transportation. Many stakeholders have expressed this need in their comments on the ongoing rulemaking package, and I urge CARB to act swiftly to incorporate this change.

Thank you for considering this matter. I appreciate your leadership in addressing both local air quality and global climate issues and your efforts to support innovative low-carbon solutions.

Sincerely,

Ravi Sekhon

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-08-27 22:14:05

No Duplicates.

**Comment 248 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Philip  
Last Name: Sheehy  
Email Address: philip.sheehy@icf.com  
Affiliation: ICF

Subject: ICF Analysis of SAF in California LCFS (LanzaJet)  
Comment:

ICF prepared the attached document for LanzaJet regarding the role of sustainable aviation fuel (SAF) in the Low Carbon Fuel Standard program.

Attachment: [www.arb.ca.gov/lists/com-attach/7584-lcfs2024-WyhXMFA3VlpWOVM9.pdf](http://www.arb.ca.gov/lists/com-attach/7584-lcfs2024-WyhXMFA3VlpWOVM9.pdf)

Original File Name: SAF in California LCFS for LanzaJet 240827 FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 23:04:21

No Duplicates.

**Comment 249 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Nicole

Last Name: Rice

Email Address: nicolerice@ca-rta.org

Affiliation: CA Renewable Transportation Alliance

Subject: CRTA Comment Letter on LCFS 15-Day Changes

Comment:

We appreciate this opportunity to submit comments on the 15-Day  
Changes to the proposed amendments to the LCFS, released August 12,  
2024.

Attachment: [www.arb.ca.gov/lists/com-attach/7585-lcfs2024-VzQBdQN2UGIBWAVm.pdf](http://www.arb.ca.gov/lists/com-attach/7585-lcfs2024-VzQBdQN2UGIBWAVm.pdf)

Original File Name: CRTA Comments on LCFS 15 Day Pkg FINAL\_082724.pdf

Date and Time Comment Was Submitted: 2024-08-27 23:05:23

No Duplicates.

**Comment 250 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Philip  
Last Name: Sheehy  
Email Address: philip.sheehy@icf.com  
Affiliation: ICF

Subject: ICF Analysis of 15-Day Changes  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7586-lcfs2024-VDVTO1Q0UG8DfwB5.pdf](http://www.arb.ca.gov/lists/com-attach/7586-lcfs2024-VDVTO1Q0UG8DfwB5.pdf)

Original File Name: Analyzing Low Carbon Fuel Targets - 15-Day Package Analysis 240826  
FINAL.pdf

Date and Time Comment Was Submitted: 2024-08-27 23:51:38

No Duplicates.

**Comment 251 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Colin

Last Name: Murphy

Email Address: cwmurphy@ucdavis.edu

Affiliation: UCD Institute of Transportation Studies

Subject: UC Davis Comment on 15 day package

Comment:

Please find attached out comment letter on the 15 day package of  
modified LCFS amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/7587-lcfs2024-Wy5cOVULVGMKbQF3.pdf](http://www.arb.ca.gov/lists/com-attach/7587-lcfs2024-Wy5cOVULVGMKbQF3.pdf)

Original File Name: UC Davis Comments on Proposed LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2024-08-27 23:34:59

No Duplicates.

**Comment 252 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Brian

Last Name: Casey

Email Address: bcasey@usventure.com

Affiliation: US Venture

Subject: Comments on the August 12, 2024, Proposed Low Carbon Fuel Standard Amendments  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7588-lcfs2024-BTJQYgQwVzNWfVU5.pdf](http://www.arb.ca.gov/lists/com-attach/7588-lcfs2024-BTJQYgQwVzNWfVU5.pdf)

Original File Name: 7457-lcfs2024-US Ventures.pdf

Date and Time Comment Was Submitted: 2024-08-28 03:09:08

No Duplicates.

**Comment 253 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Ira

Last Name: Dassa

Email Address: Non-web submitted comment

Affiliation: Twelve

Subject: Twelve Comment Letter on CARB's 15-Day Notice

Comment:

Comment received during 15-Day comment period.  
ira.dassa@twelve.co (Comment submitted by Clerk on Commenter's  
behalf).

Attachment: [www.arb.ca.gov/lists/com-attach/5-eiarecirc\\_lcfs2024-AHQFdABkUG8BcQFk.pdf](http://www.arb.ca.gov/lists/com-attach/5-eiarecirc_lcfs2024-AHQFdABkUG8BcQFk.pdf)

Original File Name: Twelve Comment Letter for 15 Day Changes.pdf

Date and Time Comment Was Submitted: 2024-08-29 10:44:04

No Duplicates.



**Comment 254 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Alexandria

Last Name: Reed

Email Address: alexandria.reed@gm.com

Affiliation: GM

Subject: GM Comments to CARB's 15-Day Notice on LCFS Amendments

Comment:

Please see attached.

Comments received during the 15-Day comment period.

Comment submitted by Clerk on behalf of commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/7-eiarecirc\\_lcfs2024-V2UCNFZIB2BQCVdn.pdf](http://www.arb.ca.gov/lists/com-attach/7-eiarecirc_lcfs2024-V2UCNFZIB2BQCVdn.pdf)

Original File Name: 2024 08\_CARB LCFS Regulatory Updates\_GM Final.pdf

Date and Time Comment Was Submitted: 2024-09-03 12:31:03

No Duplicates.

**Comment 255 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-1.**

First Name: Christopher

Last Name: Kelstrom

Email Address: Non-web submitted comment

Affiliation: Shasta County Board of Supervisors

Subject: Shasta County Board of Supervisors LCFS 15-Day Comments

Comment:

Please see attached.

Comments were received during the 15-Day comment period.

Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/8-eiarecirc\\_lcfs2024-WikGaF09AyMGdAFg.pdf](http://www.arb.ca.gov/lists/com-attach/8-eiarecirc_lcfs2024-WikGaF09AyMGdAFg.pdf)

Original File Name: Shasta\_County\_Board\_of\_Supervisors\_LCFS\_15-Day\_Comments.pdf

Date and Time Comment Was Submitted: 2024-09-06 10:02:04

No Duplicates.

**Comment 1 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-2.**

First Name: Alessandra  
Last Name: Magnasco  
Email Address: alessandra@cfca.energy  
Affiliation: California Fuels & Convenience Alliance

Subject: CFCA - Opposition LCFS Amendments  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7592-lcfs2024-AmEAYFMxU2EEXVM8.pdf](http://www.arb.ca.gov/lists/com-attach/7592-lcfs2024-AmEAYFMxU2EEXVM8.pdf)

Original File Name: CFCA Opposition - LCFS Amendments\_10.1.24.pdf

Date and Time Comment Was Submitted: 2024-10-07 14:00:08

No Duplicates.

**Comment 2 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-2.**

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

Subject: Comments on the LCFS calculators released in October 2024  
Comment:

Please find attached Chevron Corporation's comments on the most recent versions of the LCFS calculators and manuals.

Attachment: [www.arb.ca.gov/lists/com-attach/7593-lcfs2024-AW4BZFEkBztRNQht.pdf](http://www.arb.ca.gov/lists/com-attach/7593-lcfs2024-AW4BZFEkBztRNQht.pdf)

Original File Name: October 2024 Comments on LCFS Calculators.pdf

Date and Time Comment Was Submitted: 2024-10-10 16:21:29

No Duplicates.

**Comment 3 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-2.**

First Name: Kevin  
Last Name: O'Neill  
Email Address: k.j.oneill@icloud.com  
Affiliation:

Subject: Pricing  
Comment:

Why does your agency have so much power? Additionally, why are you raising prices on Californians yet again?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 05:52:18

No Duplicates.

**Comment 4 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-2.**

First Name: Jessica

Last Name: Stewart

Email Address: jessicawstewart@gmail.com

Affiliation:

Subject: DO NOT INCREASE GAS PRICES

Comment:

Californians cannot afford an additional \$0.65/gallon gas tax. Do not increase our currently outrageous gas tax.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 05:52:16

No Duplicates.

**Comment 5 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-2.**

First Name: Jerry

Last Name: Jervis

Email Address: Jerry@century21jervis.com

Affiliation:

Subject: Stop

Comment:

Stop taxing our gas! Enough is enough!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:06:24

No Duplicates.

**Comment 6 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-2.**

First Name: Catherine

Last Name: Kinney

Email Address: kinney406@gmail.com

Affiliation:

Subject: Proposed Low Carbon Fuel Amendment

Comment:

Enough is enough! We already pay more for gas than any other state in the nation. This negatively affects every single person in California...you are taxing us all to death

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:07:27

No Duplicates.



**Comment 7 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-2.**

First Name: Tim  
Last Name: Quinn  
Email Address: tq973@hotmail.com  
Affiliation:

Subject: CARB  
Comment:

You, the state of California, have already become the laughing stock of failed policies. Enough is enough. How do you sleep at night taking advantage of your people. You've seen what you can pull off with gasoline and appears to have doubled down on this carbon bs. Yes bs. God is watching.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:07:12

No Duplicates.

**Comment 8 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-2.**

First Name: Kelly

Last Name: McKeown

Email Address: mckeown.kelly@gmail.com

Affiliation:

Subject: Stop the ever increasing gas taxes

Comment:

Enough! Please stop these insane gas taxes. They are crippling our economy. Most of us want to be good stewards of the environment, but there has to be a balance. It is shocking how unelected officials can have so much power. Please come to your senses.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:10:27

No Duplicates.

**Comment 9 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-2.**

First Name: Janet

Last Name: Saalberg

Email Address: jsaalberg98@gmail.com

Affiliation:

Subject: The proposed 65 cents gas increase

Comment:

Dear CARB, Californians pay the most per gallon in the nation and yet we have oil reserves in our state. I was appalled to learn of this proposal of increasing the price of gas per gallon by 65 cents. My husband and I are teachers and despite our hard work it's getting harder to afford living in our beautiful state. Do not increase our gas prices once again. The effect on all of us in California is so costly. Sincerely,  
Janet Saalberg

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:09:43

No Duplicates.

**Comment 10 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: carrie

Last Name: berg

Email Address: berg\_carrie@hotmail.com

Affiliation:

Subject: CARB

Comment:

stop with the gas tax an raising gas prices. California is already  
the highest in the US and now they want to make it even higher.  
Please help we can't afford food or electricity and now gas.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:16:03

No Duplicates.

## **Comment 11 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Megan

Last Name: Douthit

Email Address: megandouthit96@gmail.com

Affiliation:

Subject: No

Comment:

It is already exceptionally hard to justify living in California with how expensive everything is and this would put it over the top. My family cannot afford to keep living here if gas goes up by an additional \$.65. Not only will I not be able to drive anywhere but groceries will get even more expensive.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:16:07

No Duplicates.

## **Comment 12 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Alan

Last Name: Ebright

Email Address: ebrightalan@yahoo.com

Affiliation: Concerned citizen

Subject: Fuel Taxes

Comment:

CA policies on taxing and penalizing all companies involved in the production process has backfired wildly. This is a crusade to force adoption of EVs onto society. Overtime, adoption will happen, but what is happening now is like forcing a square peg thru a round hole.

Easing the operating environment for these companies is a better direction or there will be less supply and permanently higher prices. Bad for the consumer!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:11:19

No Duplicates.

## **Comment 13 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Carver

Last Name: Young

Email Address: Carveryoungother@gmail.com

Affiliation:

Subject: Gas price hike

Comment:

California is making me broke I grew up here my whole 40 years of existence. I will never be able to afford a home here I can barely afford to eat food these days. Gas is already the highest in the nation even above Hawaii which is an island that does not produce any oil. Please stop forcing us to pay higher gas prices because you believe to know what's best for the environment. Yes I love the environment more than I love people but I can't afford it anymore. You are crushing the poor class and pushing on the chests of the middle class. You are not effecting the upper class because we know they have enough money to live 10 life times. You cannot raise the gas tax anymore. It's reached capacity.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:23:00

No Duplicates.

**Comment 14 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Kristine

Last Name: Benson

Email Address: krissiebarker@hotmail.com

Affiliation:

Subject: CARB

Comment:

This is absolutely the most ridiculous, power hungry play ever! I have never thought I would see a States elected officials throw a temper tantrum because they don't always get their way and then abuse the power by financially abusing its citizens!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:28:56

No Duplicates.



**Comment 15 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Allyson

Last Name: Ramser

Email Address: ally.r.young@live.com

Affiliation:

Subject: Additional Gas Tax

Comment:

I vehemently oppose any additional gas tax. Our state is an utter disgrace. We pay the 2nd highest rates in the nation due to poor leadership and corruption. Eventually the people will wake up and vote you all out of office. I will do everything I can to send this to everyone I know to send in their opposition. You cannot continue to abuse power this way and take advantage of us in an already weak economy. People are suffering to make ends meet and of course the idea Newsom and all the cronies have is to tax us more. It's pure evil.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:33:15

No Duplicates.

**Comment 16 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Kimberly

Last Name: Ramser

Email Address: ramserkimberly@gmail.com

Affiliation:

Subject: Oppose gas tax

Comment:

I strongly oppose the the new gas tax being proposed

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:39:57

No Duplicates.

**Comment 17 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Nicholas

Last Name: Prytherch

Email Address: nicholas.prytherch@gmail.com

Affiliation:

Subject: LCFS Community Impact

Comment:

Please stop creating initiatives that ultimately increase the end price of gasoline for Californians. We already have the highest prices in the nation because of additional tax. Prices are being continuously raised through various legislative actions, yet the Governor blames the suppliers. With the highest taxes in the nation coupled with our current housing crises, massive budget defect, homelessness crisis, and a slew of other financial woes, now is not the time to put more pressure on hardworking Californians. Stop the madness!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:31:41

No Duplicates.

## **Comment 18 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Jeffrey

Last Name: Beardsley

Email Address: Jbturf2020@gmail.com

Affiliation:

Subject: Additional Fees and or taxes on Fuel

Comment:

Please consider a review of carbon sequestration and according the National Instories Heqlth research (see below link) "plants are crucial players involved in carbon sequestration". Specifically, turfgrass which captures and stores atmospheric CO2 in its plant biomass (root system). Significant and detrimental air quality effects are occurring unchecked by the false claims of water savings through mass turf reduction programs. The heat sinks and carbon emissions released are simply profound!

I urge CARB to act in a regulatory fashion to protect the mass carbon release going on today.

Please see the NIH article to better understand this issue.

Jeff Beardsley

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9571228/>

Attachment: [www.arb.ca.gov/lists/com-attach/7610-lcfs2024-B2RSNVMgU2IAaQZo.pdf](http://www.arb.ca.gov/lists/com-attach/7610-lcfs2024-B2RSNVMgU2IAaQZo.pdf)

Original File Name: Carbon Sequestration in Turfgrass–Soil Systems - PMC.pdf

Date and Time Comment Was Submitted: 2024-10-11 06:19:54

No Duplicates.

**Comment 19 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Steffani

Last Name: Fisher

Email Address: steffanifisher@gmail.com

Affiliation:

Subject: Gas Prices

Comment:

Our gas prices and taxes are the highest in the nation. You need to make do with the budget you have and not raise our gas prices anymore.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:35:20

No Duplicates.

**Comment 20 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Katherine

Last Name: Ursini

Email Address: Kathyursini@gmail.com

Affiliation:

Subject: Gas prices

Comment:

If you think this is such a great idea, why are you waiting until  
three days after the election to impose it?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:48:32

No Duplicates.

## **Comment 21 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Ryan

Last Name: Gaytan

Email Address: Ryangaytan@gmail.com

Affiliation: None

Subject: Gas Taxes and Prices

Comment:

Good morning. Gas prices in California are already the highest in the nation, primarily driven by our state taxes and mandated refining standards that are different from other states.

At the same time, California's housing and food costs have skyrocketed out of control and more people are struggling to get by than ever.

Any change to regulations that would increase gas prices further would disproportionately affect low and middle income people. Please vote against any changes to regulations that would increase gas prices - and I'd strongly encourage you to roll back whatever regulations you can to help bring our gas prices more in line with the rest of the country.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:48:51

No Duplicates.

**Comment 22 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Christine

Last Name: Lutz

Email Address: chrissmiss8@aol.com

Affiliation:

Subject: Stop Raising our Gas Prices!!!

Comment:

This is insane, stop raising our gas prices! We do not support  
this!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:55:55

No Duplicates.



## **Comment 23 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Lauren

Last Name: Beck

Email Address: laurenandbryan2010@yahoo.com

Affiliation:

Subject: Stop raising our gas prices!

Comment:

You are price gouging the people you are supposed to represent. If this was on the ballot, there is no way it would pass. You are unilaterally causing the highest gas in the country with your broad restrictions. If you need money for the deficit you created, find another way other than by taxation without representation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:58:14

No Duplicates.

**Comment 24 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Claire

Last Name: Curci

Email Address: ramserclaire@gmail.com

Affiliation:

Subject: Oppose new gas tax

Comment:

We have seen too many gas tax increases over the last few years  
please do not pass another one. We are all struggling and tax  
payers wouldn't approve this if voted on

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:00:20

No Duplicates.

## **Comment 25 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Carson

Last Name: Hill

Email Address: carsonphill@gmail.com

Affiliation:

Subject: Higher Gas Prices

Comment:

Why is it that we use more energy than any other state to make our gas that some say doesn't burn any cleaner? At what cost of emissions energy to make our fuels does it make sense? How much emissions are put off compared to other states per gallon in CA? What is the reason for the tax hike? What is it going to fix or how is it going to stop climate change? Do you realize this only hurts the lower income communities more by raising gas prices? The single mother that is trying to make ends meet that has to drive her kids to school then 20 miles both ways every day for work. This doesn't help our already struggling economy in CA. This will make everything worse by making everything more expensive and more difficult for the lower income families and communities.

Throwing money at something doesn't always work!

What is the reason for the CARB sticker on the boats? What do they mean and what do they actually accomplish for CARB?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 06:48:16

No Duplicates.

**Comment 26 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Angelique  
Last Name: Francis  
Email Address: angelfrancis23@yahoo.com  
Affiliation:

Subject: No on new .65 gas tax!  
Comment:

No on new .65 gas tax!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:15:15

No Duplicates.

**Comment 27 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: James

Last Name: Leimkuhler

Email Address: jim.leimkuhler@gmail.com

Affiliation:

Subject: CARB Policy on Fuel

Comment:

What are you even thinking? Putting more regulations on companies that make gasoline including diesel fuel is totally wrong. We need less regulation and government intervention in what private companies do. Let consumers (the people) vote with their feet or their wallet vs more onerous policies set by your board. California gas prices are so I reasonably high due to your policies how can you even think of adding to the burden? Just stop please.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:15:09

No Duplicates.

## **Comment 28 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Mollie

Last Name: Butcher

Email Address: Molliebrady@roadrunner.com

Affiliation:

Subject: Low carbon fuel standard amendments

Comment:

California can not afford 1 cent of an increase in taxes on fuel. Get back to reality and stop gaslighting the citizens of our state! You can't keep taxing hard working citizens to solve our horrendous actions of Newsom! It's unacceptable and unconstitutional to keep raising CA taxes! You all aren't elected by "we the people"! It's outrageous and you should all be ashamed at the harm you are doing to people who can't even afford to feed their families all over California!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:15:16

No Duplicates.

**Comment 29 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jordan

Last Name: Francis

Email Address: jordan.francis1987@gmail.com

Affiliation:

Subject: Don't do it

Comment:

Please do not increase any standards or costs on our refineries.  
You would only be worsening the quality of life for everyone stuck  
living in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:24:36

No Duplicates.

**Comment 30 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Ann

Last Name: Ramser

Email Address: Annramser@hotmail.com

Affiliation:

Subject: Gas tax

Comment:

Enough is enough! I object to the proposed upcoming gas tax. Californians pay more than their fair share. Gas in our state is insanely expensive. Our state representatives need to find another way to fund their bloated spending.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:22:40

No Duplicates.



**Comment 31 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Daniel

Last Name: McGirr

Email Address: danieljeremiah1121@gmail.c

Affiliation:

Subject: Gas

Comment:

Don't you dare raise prices on gas again.      Enough is enough

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:29:05

No Duplicates.

**Comment 32 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Lisa

Last Name: Johnson

Email Address: ljohnson@coastalshred.com

Affiliation: Taxpayer

Subject: Gas prices

Comment:

One bad decision does not deserve more and more!  
California is in a definite downward spiral! You have lost a  
majority of the tax paying workers by your cumulative bad decisions  
and raising gas prices is not the answer !

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:23:44

No Duplicates.

## **Comment 33 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Suzanne

Last Name: Coulston

Email Address: suzannecms@yahoo.com

Affiliation:

Subject: Stop Raising Gas Prices

Comment:

Those of us that live in south Orange County that aren't the Uber wealthy are struggling to fill our tanks to get to work. Much less afford to buy an electric car. My electric bill is already outrageous. I have 1 kid in college and 2 more right behind her. I make just a little too much for financial aid but not enough to not live paycheck to paycheck. Please don't raise the gas prices. This hurts middle and lower class more than anything else. If we can't get to work, we can't thrive. We've already cut cable and every other non essential. Getting to work is an essential.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:31:31

No Duplicates.

**Comment 34 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Tamala

Last Name: Waken

Email Address: Jtwaken@hotmail.com

Affiliation:

Subject: CARB regulations

Comment:

I am against the proposed low carbon fuel standard amendments. These amendments will raise the price of fuel. We in California are under a huge financial burden because of high gas prices. It's difficult to care for our family's needs when so much of our budget goes to pay for gas.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:32:29

No Duplicates.

**Comment 35 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Sherry  
Last Name: Kendzejeski  
Email Address: gueshuu@yahoo.com  
Affiliation:

Subject: Carb  
Comment:

Would like more information as this sounds ludicrous.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:42:24

No Duplicates.

**Comment 36 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Lorin

Last Name: McDaniel

Email Address: Loriliz29@aol.com

Affiliation:

Subject: Proposed low carbon fuel

Comment:

I am very much against this bill. This is not only an incredibly high increase in cost to those of us who live here but it continues to show that the leaders of this state put the needs of the people last. It is ego and power over care for those of us who live here. We are the 2nd most expensive state to live in. Stop trying to fill your wallets and care for the people and do Not pass this.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:36:40

No Duplicates.

**Comment 37 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Cardon

Last Name: Smith

Email Address: Cardonsmith@gmail.com

Affiliation:

Subject: No additional gas taxes

Comment:

Our state's additional gas taxes are already crippling. It's adding to the unaffordability problem we are all facing and is an undue burden.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:44:15

No Duplicates.

**Comment 38 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Lynn

Last Name: Bender

Email Address: lynn@bendersonline.com

Affiliation:

Subject: No more gas taxes

Comment:

How can you consider any more regulations that will increase gas prices in this state when we are already paying significantly more than just about everyone else in the country? When is enough enough? Where does the greed stop and when will concern for the people being impacted by these prices begin?  
Please stop.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:47:39

No Duplicates.



**Comment 39 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Joseph

Last Name: Byrd

Email Address: Josephbyrd09@gmail.com

Affiliation:

Subject: Gas price increase

Comment:

To whom this may concern,

I am against an increase in the gas tax/fees in California.

Thank you,

Joseph Byrd

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 07:35:41

No Duplicates.

**Comment 40 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Carrie

Last Name: Lee

Email Address: carrie.h.lee@gmail.com

Affiliation:

Subject: NO MORE TAXES!

Comment:

Please stop raising our gas taxes. We are spread so thin in the state of California and you continue to just raise taxes. This impacts people of all works of life. Your madness needs to end.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:00:55

No Duplicates.

**Comment 41 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Niki

Last Name: Good

Email Address: ngood7@gmail.com

Affiliation:

Subject: CARB gas increase proposal

Comment:

As a citizen of California I am registering myself a protester to the proposed gas increases. I do not agree with the basis for the increases or with the proposed increases to be passed along to us in the form of increased taxes on gas.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:01:10

No Duplicates.

## **Comment 42 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Edris

Last Name: Chambers

Email Address: thechambersbunch@sbcglobal.net

Affiliation:

Subject: Please don't raise gas prices

Comment:

Please don't pass the Low carbon gas tax

Gas prices are already too high - let the refineries make gas. This nonsense of the highest prices in the nation is killing the California economy- not all of us want to rely on electric vehicles that are overpriced and undependable - our power grid barely survives a normal summer and not all of us have the time to get to charging stations that are few and far between. This is nonsense and it needs to stop.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:04:43

No Duplicates.

**Comment 43 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Mark

Last Name: Foster

Email Address: gulfhawk@aol.com

Affiliation:

Subject: Gasoline taxes

Comment:

I'm against any increases or additions to the current gasoline taxes. I believe California has a spending problem, not a revenue problem. I'm also opposed to any new taxes based on miles driven. We are already paying exorbitant amounts for vehicle registrations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:06:31

No Duplicates.

**Comment 44 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Diane

Last Name: Hurst

Email Address: Diane.hurst@mac.com

Affiliation:

Subject: Gas tax

Comment:

We need LOWER gas prices in California. To pay for their gas,  
workers and business owners raise prices for everything, everyone  
is hurt both ways!  
Please focus on individuals and families and do not tax gas any  
more!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:02:12

No Duplicates.

**Comment 45 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Elizabeth

Last Name: Applebaum

Email Address: betsy.apple@verizon.net

Affiliation:

Subject: Gas Prices CARB Regulations

Comment:

Do NOT add regulations that raise gas prices more! We are watching  
and aware!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:14:53

No Duplicates.

**Comment 46 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Kerry

Last Name: McCarthy

Email Address: kerrykmk@gmail.com

Affiliation: Resident of CA

Subject: Increase of Gas Tax

Comment:

This tax increase on top of all the other taxes we pay on gas is going to create a financial strain on my family. I think it is irresponsible and unnecessary. Please do a better job of managing our taxes. We already have the highest gas taxes in the nation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:16:11

No Duplicates.



**Comment 47 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Chad

Last Name: Rutan

Email Address: azchadley@gmail.com

Affiliation:

Subject: CARB fuel increase

Comment:

we are tired of how much money we have to pay for fuel. It's  
ridiculous. Stop taking our money.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:25:04

No Duplicates.

**Comment 48 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Rocco

Last Name: Muratore

Email Address: rjkmuratore@gmail.com

Affiliation:

Subject: Stop taxing gas!!

Comment:

Enough already. Cut back on what you give to people that are here  
illegally

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:32:29

No Duplicates.

## **Comment 49 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Laura

Last Name: Morris

Email Address: morris.lauram@gmail.com

Affiliation: None

Subject: Unnecessary Gas Price Hike

Comment:

The California working class is struggling. It is so hard to live in this state, especially for those who have a family to support. California has the highest gas prices in the nation. I have not checked recently, but I imagine it's over three dollars more expensive a gallon than in some states. Why would anyone want to unnecessarily increase gas prices again with another nonsense fee or tax? You are crippling people. It won't be the rich you hurt as they can afford it. It's going to be low income people who typically drive farther or use their vehicles for work. In this economy people are struggling to pay rent and put food on the table. Have you not thought about how increasing gas prices is going to detrimentally impact the majority of people in the state?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:25:48

No Duplicates.

**Comment 50 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Lauren

Last Name: Kramer

Email Address: Lbauer24@hotmail.com

Affiliation: California resident for 45 years

Subject: Gas Prices

Comment:

Please do not increase the fees or taxes that would raise gas prices once again. Everyone has already been squeezed hard enough by inflation and California already has the highest gas prices in the continental US. Stop doing this to us. We are tired. We work so hard and California keeps taking more and more. Please do not take this action in November. Please.

Sincerely,

Lauren Kramer

(Born in Long Beach, raised in Santa Ana, lifelong Californian)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:36:11

No Duplicates.

## **Comment 51 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Elise

Last Name: Connor

Email Address: econnor333@gmail.com

Affiliation:

Subject: Carb gas increase

Comment:

California legislators need to stop additional gas tax increases by CARB. Stop gaslighting citizens to believe the high prices are caused by oil companies. Hi gas prices in California are caused from

Illegitimate taxes , fees and levies placed upon citizens by our legislators. No more increases in gas prices.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:40:22

No Duplicates.

**Comment 52 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Krizia

Last Name: Liquido

Email Address: Krizias@gmail.com

Affiliation:

Subject: NO on the Gas Tax

Comment:

I'm a resident of Costa Mesa, CA and I vote NO on regulations to raise the gas tax by 65 cents. Please vote NO on me and my family's behalf. We are a family of 7 struggling to pay for BASIC NECESSITIES. We DO NOT have extra funds to subsidize these regulations!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:47:58

No Duplicates.

**Comment 53 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Rebecca

Last Name: McGuff

Email Address: Beckymcguff@gmail.com

Affiliation:

Subject: No Additional Gas Tax

Comment:

I'm a resident of Costa Mesa, CA and I vote NO on future regulations to raise the gas tax by 65 cents. Please vote NO on behalf of me and my family. We are a family of 4 struggling to pay for BASIC NECESSITIES like our home, food, utilities, and our children's education. We DO NOT have extra funds to subsidize these regulations!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:55:32

No Duplicates.

## **Comment 54 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Catharine

Last Name: Giles

Email Address: Cathgiles@yahoo.com

Affiliation:

Subject: CARB proposed price increase / low carbon fuel

Comment:

Hello All,

California has the most expensive gas already with nearly \$1.50 of every gallon going to CA taxes. This increase of another possible \$0.68 makes the cost of gas prohibitive, especially to people who commute or are low income. Pair this with Newsom's ill conceived attempt to force storage levels on refineries and you have a power keg situation. The refineries will pass on the storage costs to consumers. So what, we'll have the cost of gas tax in CA nearing \$3 of every gallon? The level of bureaucratic absurdity in this policy is endemic of unelected officials making policies they don't understand, with wide ranging negative economic impact on all residents. These policies increase the cost of living, which will fuel the continued exodus of people moving out of state. It's time to stop making the cost of living in CA unreasonable.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 08:48:10

No Duplicates.



**Comment 55 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Christa

Last Name: Cole

Email Address: ac90210@aol.com

Affiliation:

Subject: No additional tax on gas

Comment:

California gas taxes are already too high. I mostly drive to take my son to school. He would go to school near our home where he can ride his bike but he was not allowed to enroll due to California law (he cannot have vaccination for medical reasons but could not get a medical exemption). So if California puts an additional tax on gas, I am now paying even more for my child's education. I am a 4th generation California native. California needs to slow down its taxes or my family will be forced to leave.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 09:05:23

No Duplicates.

## **Comment 56 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Andrew

Last Name: Belden

Email Address: andrewbelden@gmail.com

Affiliation:

Subject: Concerns Regarding Proposed Gas Price Increase

Comment:

Dear California Air Resources Board,

I am writing to express my concerns about the recent proposal that could potentially increase gasoline prices by as much as \$0.65 per gallon. While I fully support California's commitment to reducing emissions and promoting environmental sustainability, I believe this particular measure may have significant adverse effects on individuals, families, and businesses across the state.

Raising gas prices by such a substantial amount would place an additional financial burden on California residents, especially those in lower-income communities who rely heavily on personal vehicles for commuting and essential errands. The proposal could also have a ripple effect on the economy by increasing transportation costs for businesses, which may then pass these costs on to consumers.

Additionally, this price increase could disproportionately affect rural communities where public transportation options are limited, making it even more challenging for residents to afford necessary travel. It is crucial to consider policies that do not inadvertently impact vulnerable populations or create significant financial strain.

Instead of raising gas prices, I urge CARB to explore alternative approaches that continue to advance our environmental goals without compromising affordability and accessibility for all Californians. Initiatives like investing in public transportation infrastructure and promoting carpooling programs that can also help reduce emissions effectively.

Thank you for your time and consideration. I hope that CARB will take into account the potential economic and social impacts of this proposal on California's residents. California residents are already overly burdened with the highest taxes in the state. This will only exacerbate the California exodus.

Sincerely,

Andrew Belden

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 09:04:39

No Duplicates.

**Comment 57 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Michele

Last Name: Wilbert

Email Address: michelewilbert1@gmail.com

Affiliation:

Subject: Gas Price Increase

Comment:

The decisions and choices the state of CA are making do not reflect the people they represent. Consider the avg salary & then calculate what the cost is for that family to fill their tank each week.

We need better fiscal responsibility in all areas so that gas prices aren't used to make up for deficits.

I live in the Central Valley and pay the most for gas in an area that produces gas. How does that make sense?

Make your decision based on what is best for the people you serve.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 09:33:16

No Duplicates.

**Comment 58 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Annette

Last Name: Harper

Email Address: amharper1@cox.net

Affiliation:

Subject: Gas prices

Comment:

It is absolutely unacceptable to consider an additional increase in gas prices or gas tax in CA! You are LITERALLY driving people out of the state!

I will not and do not support this!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 09:40:05

No Duplicates.

**Comment 59 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Alison

Last Name: Andrizzi

Email Address: andrizzifamily@msn.com

Affiliation:

Subject: Proposed gas tax increase

Comment:

Is California trying to run everyone out of the state by acting like the government agencies know better than its citizens? I cannot believe this act is even possible three days after an election! Please stop trying to make life harder. I disagree with your policies and hope our state government will listen to the people and allow a vote!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 09:39:20

No Duplicates.

**Comment 60 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Anita

Last Name: Munson

Email Address: anitamunson10@gmail.com

Affiliation:

Subject: OPPOSE proposed gas tax

Comment:

Hello, I am writing to voice my OPPOSITION to the proposed 65¢ gas tax.

Thank you,  
Anita Munson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 09:49:59

No Duplicates.

**Comment 61 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Eric

Last Name: Sentianin

Email Address: Ericsentianin@yahoo.com

Affiliation:

Subject: Additional Gas Tax

Comment:

No need for higher tax on gas. This state is consistently pushing taxes higher for the wrong reasons. It is destroying the middle and lower class income families. The state needs oversight and accountability about where the funds go. The streets are in shambles, the freeways have garbage and weeds growing all over them. It's obvious that the money is not being spent on fixing or taking care of our roadways.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 09:54:02

No Duplicates.



**Comment 62 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Ryan

Last Name: Burgess

Email Address: Rcburgess83@gmail.com

Affiliation:

Subject: Carb Hike

Comment:

Please you cannot raise gas again. This is getting pretty hard to comprehend how you can not care about the people in your state and how they can or cannot get by. There is a reason people are leaving California. I do not think this is fair. Please do NT proceed.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 09:58:09

No Duplicates.

**Comment 63 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Chase

Last Name: Rief

Email Address: chase.rief@gmail.com

Affiliation:

Subject: Opposition to Further Gas Price Increases through LCFS Amendments

Comment:

Dear CARB Commissioners,

I urge you to reconsider the proposed amendments to the Low Carbon Fuel Standard (LCFS), as they could raise gasoline prices further in an already challenging economic environment. California gas prices are the highest in the nation, and consumers are struggling with high inflation, reduced purchasing power, and wages that haven't kept pace over the past decade.

Now is not the time to burden Californians with additional costs at the pump. I encourage a balanced approach that considers consumer impact alongside environmental goals.

Thank you for considering public input on this matter.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 10:10:16

No Duplicates.

**Comment 64 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Tara

Last Name: Warner

Email Address: mrstarawarner@gmail.com

Affiliation:

Subject: No yo higher Gas prices

Comment:

I'm a mom of 6. I'm already paying too much for gas. Other states do not have to pay this. In our home if we are over budget, we don't tax our kids. We cut the budget. That is just a normal, adult responsibility. If our state is out of money, please just change and limit how your spending money. Make the necessary sacrifices so we don't have to pay for your lack of management.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 09:56:55

No Duplicates.

## **Comment 65 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Joelle

Last Name: Palombo

Email Address: emprisesky@gmail.com

Affiliation:

Subject: No More Gas Taxes in CA

Comment:

Dear Sirs,

I defiantly oppose any further regulations put on companies such as Chevron in the state of CA. You have already pushed away every other company and Chevron is the only company left that will work with the state. These additional regulatory requirements you are adding will add .65-\$2.00 a gallon more in gas prices for the consumer and we cannot sustain another increase or tax!! We are all living paycheck to paycheck with multiple jobs, raising our kids and now this.

Please take Chevron seriously because they will walk IF you decide to add further restrictions and WE THE PEOPLE cannot afford it. Put aside the green new deal ideologies and start caring about the well being of your citizens in CA.

We are tax paying and law abiding citizens that do not want this!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 10:23:08

No Duplicates.

**Comment 66 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Tara

Last Name: Loew

Email Address: taralking@gmail.com

Affiliation:

Subject: We are all going broke!!

Comment:

We cannot afford any more hikes in gas prices in CA!! Quit working against the working class and make policies to protect working Americans! This is insanity..it's like kicking us while we are down. STOP

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 10:32:47

No Duplicates.

**Comment 67 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jodi

Last Name: Harist

Email Address: Mycaliforniaeditor@gmail.com

Affiliation:

Subject: .65 cent increase

Comment:

STOP the California insanity! Do not burden the citizens more.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 10:40:34

No Duplicates.

**Comment 68 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: TRACY

Last Name: CAZARES

Email Address: traveltj@surfside.net

Affiliation:

Subject: Fuel Price Gouging

Comment:

Our fuel prices are higher than Hawaii. How is that possible? We have the highest fuel prices in the country. California is the absolute worst place to live. I would move out if I could. I will NEVER drive an EV. So suck it carb.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 10:51:44

No Duplicates.

**Comment 69 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Karen

Last Name: Escobar

Email Address: ocsportynurse@aol.com

Affiliation:

Subject: Gas pricing

Comment:

Do not raise gas prices. We are already the highest in the Nation.  
Where is the audit for where all previous taxes collected on gas  
have gone to and or spent? Do not say our roads because they are  
still horrendous. You have no accountability for the decisions  
made. You should already have a list of where monies have been  
allocated to so no need to "pay" more for an audit.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 11:24:02

No Duplicates.



**Comment 70 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Brigide

Last Name: Daily

Email Address: Bldailydc@gmail.com

Affiliation:

Subject: Gas tax

Comment:

Please do not add taxes or fees to our gas prices.  
It is difficult to make ends meet and these fees are exorbitant.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 11:19:09

No Duplicates.

**Comment 71 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Linsey

Last Name: Carbone

Email Address: linseys@yahoo.com

Affiliation:

Subject: No gas price hikes!

Comment:

Please please please I'm a mother of young children and we  
absolutely cannot take another hike in gas prices right now.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 11:35:26

No Duplicates.

## **Comment 72 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Brian

Last Name: Schuler

Email Address: bk\_schulz@yahoo.com

Affiliation:

Subject: Gas tax increase

Comment:

In no way am I for this tax... instead I propose massive cuts to government agencies (not public safety agencies). Stop with the ludicrous climate regulations and overbearing wasteful spending for ILLEGAL aliens. Get control of existing budget... addition by subtraction formula.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 11:38:05

No Duplicates.

## **Comment 73 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Michael

Last Name: Masai

Email Address: mmasai9765@aol.com

Affiliation:

Subject: Gas Price Increase

Comment:

Come on! You got to think about what 65 cents would do to the economy in Ca. Are you people idiots or just dumb or a little of both. People who have drive to work in traffic or long distances can't afford the gas prices now because of your already in place statues. What about the truck drivers who transport all the goods? College education or degrees just breed stupidity and no common sense.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 12:06:14

No Duplicates.

**Comment 74 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Eileen

Last Name: Saul

Email Address: eileensaul@cox.net

Affiliation:

Subject: Low carbon fuel amendments!

Comment:

I urge you not to oppress the citizens of California with another Insane and Unnecessary tax on our gasoline usage! We do not need another .65/ gallon raise in the cost of gas in this State. We are already paying the highest gas prices in the nation. Stop the insanity!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 12:26:11

No Duplicates.

## **Comment 75 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Travis

Last Name: Duffield

Email Address: Travis@duffyboats.com

Affiliation:

Subject: Low Carbon Fuel Standard

Comment:

I would like to know what the purpose of this regulation is and how me paying even more for fuel is somehow going to save the planet. Your climate agenda is crushing the middle/lower class (who fund your organization I might add). We already pay the highest prices in the country, and you want more regulation that will further increase those costs? Please help me understand the benefit of these proposed regulations. I have seen no good come from anything that CARB has done. What you have done successfully is forced hardworking Californians out of business and out of state. Congratulations!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 12:05:35

No Duplicates.

**Comment 76 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Gina

Last Name: Gleason

Email Address: ginagleason@mac.com

Affiliation:

Subject: Opposed to Fuel Price Increase!!

Comment:

I am opposed to the \$0.65 addition to gas prices in CA. Please stop the madness and DO NOT PASS THIS!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 12:44:21

No Duplicates.

**Comment 77 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Landon

Last Name: Brewer

Email Address: Landonbrewer@gmail.com

Affiliation:

Subject: Do NOT increase our gas taxes.

Comment:

We already pay an absurd amount of gas tax. You cause more local inflation and damage to family savings than any other unelected or elected agency. Please stop for the love of God.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 12:54:23

No Duplicates.



**Comment 78 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Katherine

Last Name: Asher

Email Address: Katherineasher1@gmail.com

Affiliation:

Subject: Prop to raise gas prices

Comment:

California already has some of the highest prices of gas per gallon in the nation. A hike of \$0.65 a gallon is incredibly ludicrous and unnaccwptable. Especially when proposed by a board that is unelected. Do not proceed with this increase. Haven't we already seen enough young families, businesses and wealth leave our beautiful state?!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 13:00:29

No Duplicates.

**Comment 79 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Lauren

Last Name: Bennett

Email Address: Lauren.geeves@gmail.com

Affiliation:

Subject: No on gas tax

Comment:

Being a huge state in our county we can no longer hold our citizens victims to gas taxes. We can't assume everyone can buy new EV cars and punish them for not following the mandate. People are leaving our state bc you hand made it unsafe and unaffordable. We have refineries for a reason . Let's us them and stop punishing the citizens with unnecessary taxes that are even helping out anyone or anything substantial.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 13:18:59

No Duplicates.

**Comment 80 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Monique

Last Name: Dixon

Email Address: Moniquedixon14@gmail.com

Affiliation:

Subject: Gas prices

Comment:

Please don't raise gas prices anymore, I can't afford it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 14:07:29

No Duplicates.

## **Comment 81 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Shari

Last Name: Sell

Email Address: sharisell@gmail.com

Affiliation:

Subject: .65 cent/gallon tax increase

Comment:

To whom it may concern,

CARB is the primary state agency responsible for actions to protect public health from the harmful effects of air pollution and to address global climate change. This increased gas tax you plan to add three days after the 2024 election has nothing to do with the idiots in Sacramento who didn't think about this whole electric car reality all the way through and how it would impact future non-gasoline tax government revenue. So now that gas revenue isn't as high as it used to be, you are now "losing" revenue, so let's gouge those who still use the pumps. If you keep adding this and that tax, I wouldn't be surprised if the refineries will eventually refuse to do business with the state of California. Please do better! Think of the ramifications of this additional tax and how it will affect a lot of Californians.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 13:38:05

No Duplicates.

**Comment 82 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Carrie

Last Name: Prentice

Email Address: carriekprentice@gmail.com

Affiliation:

Subject: No to increasing gas prices

Comment:

We are respectfully requesting you do not raise gas prices in CA. We are a family of four, including a newborn. We have good careers, but despite that, we continue to live paycheck to paycheck barely having enough money to pay for all necessities to live here. Please help the residents in California by not increasing gas prices. If not, you will continue to lose more and more people who will flee the state. Please stand up for the people who live here.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 14:12:22

No Duplicates.

## **Comment 83 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Peter

Last Name: Belden

Email Address: peterbelden@gmail.com

Affiliation:

Subject: Vote NO on increased gas taxes

Comment:

Please do not increase the price of gasoline. I can barely afford to fill my tank with the current prices.

I understand the reason behind the desire to reduce CO2 emissions but this is going too far. I do not support this additional tax.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 14:15:13

No Duplicates.

## **Comment 84 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Monica

Last Name: Munguia

Email Address: monimunguia@outlook.com

Affiliation:

Subject: Please do not raise gas prices

Comment:

The burden in my family with the increase in gas prices for basic transportation to work and schools is off charts. The possible increase in basic products is an ongoing concern. Please do not raise gas prices. We deserve to live normal lives without the concern on how the future looks here in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 14:22:58

No Duplicates.

## **Comment 85 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Kellie

Last Name: Wilkie

Email Address: kellie@beachmusic.com

Affiliation:

Subject: Low Carbon Fuel Standard Amendments

Comment:

I'm writing to express my concerns about the potential \$0.65 increase in gas prices. I don't understand how you and others in Sacramento fail to see how constant taxation burdens the citizens of this state. How are people supposed to live and support their families under these excessive taxes? And for what? Most of our tax dollars are wasted, with no noticeable improvements. Our gas prices are already the highest in the nation, even compared to Hawaii. Now, you're proposing an additional \$0.65 per gallon, and to implement it after the election. This is deceitful, and your lack of transparency is both concerning and unsurprising. For once, consider how your decisions are affecting the people you're supposed to support.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 14:28:43

No Duplicates.



**Comment 86 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Tressa

Last Name: Coburn

Email Address: tressacoburn@sbcglobal.net

Affiliation:

Subject: Gas taxes

Comment:

I cannot believe that you guys think it's a smart choice to raise Californians taxes for gas when we are literally dealing with high inflation and barely making it by. This Hurts lower economical household at a much higher rate think about that

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 14:41:20

No Duplicates.

**Comment 87 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Ilianna

Last Name: Ramirez

Email Address: itty25@yahoo.com

Affiliation:

Subject: Gas price increase

Comment:

Hello!

I oppose gas price increase in California. We are already  
struggling to afford what we are paying now.  
We are one of the highest in the nation .

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 14:44:01

No Duplicates.

**Comment 88 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Trish

Last Name: Ponder

Email Address: dmama1967@gmail.com

Affiliation:

Subject: Gas increase

Comment:

Our citizens are already at capacity financially. Please please  
don't pass new legislation for any more gas taxes. We can't afford  
it

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 14:54:48

No Duplicates.

**Comment 89 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Rich

Last Name: Marotti

Email Address: richfm@hey.com

Affiliation:

Subject: Are you kidding?

Comment:

Like seriously. Are you fucking kidding me. Gas is already more expensive in CA than HI. That's absurd. Any action taken to increase gas prices is an attack on California citizens.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:03:40

No Duplicates.

## **Comment 90 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Tom

Last Name: Morgan

Email Address: tom.andrew.morgan@gmail.com

Affiliation:

Subject: Gas Prices

Comment:

Gas prices are already killing us at the pump year over year and now you think raising prices an avg of .50 cents a gallon is a good idea? What to push some green agenda? So push us all in to poverty to complete your vision of the future?

You are not elected by the people of this state therefore you shouldn't be taking money from us by taxation. Second, if you have a crap about the environment you'd bring back nuclear and not be solar projects that are destroying habitats in the desert. Lastly get on worthless Gov who's dropping billions on a train and start implementing actual policies that don't dive in to Marxism (such as yourselves).

The middle class and the poor can't afford your bs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:00:48

No Duplicates.

**Comment 91 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Shelby

Last Name: Neal

Email Address: shelby.neal@darlingii.com

Affiliation: Darling Ingredients

Subject: Comments on 2nd 15-day change package

Comment:

Thank you for considering our comments.

Attachment: [www.arb.ca.gov/lists/com-attach/7683-lcfs2024-BmJcOwR3BDtRPgln.pdf](http://www.arb.ca.gov/lists/com-attach/7683-lcfs2024-BmJcOwR3BDtRPgln.pdf)

Original File Name: Darling Comments on 2nd 15-Day Change 10-11-2024.pdf

Date and Time Comment Was Submitted: 2024-10-11 15:05:27

No Duplicates.

**Comment 92 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Leslye

Last Name: Roman

Email Address: Helloleslye@gmail.com

Affiliation:

Subject: Do not raise gas prices

Comment:

Enough is enough. How do you sleep at night

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:09:21

No Duplicates.

**Comment 93 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Glenn

Last Name: Halperin

Email Address: glennhalperin@att.net

Affiliation:

Subject: Increasing gas tax

Comment:

What makes you think that this help anything? Why are smog checks required on cars built after 1975? That is a 50 year old car.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:14:26

No Duplicates.



**Comment 94 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Justine

Last Name: Leach

Email Address: Sftbalmom@ymail.com

Affiliation:

Subject: Gas Tax

Comment:

I do not want any more taxes added to fuel.  
I do not support gas taxes!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:15:43

No Duplicates.

**Comment 95 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Alex

Last Name: Young

Email Address: youngisalex@gmail.com

Affiliation:

Subject: Stop the gas tax

Comment:

Please stop the gas tax. We can't afford it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:18:20

No Duplicates.

**Comment 96 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Lori Ann

Last Name: Haigh

Email Address: Loriann.haigh61@gmail.com

Affiliation:

Subject: Greed is a horrible rat hole!

Comment:

Stop raising gas prices! California gas is higher than any state in the country! STOP! money grab is evil! Stop tacking on additional tax to our gas! You are taking advantage!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:27:13

No Duplicates.

**Comment 97 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jasce

Last Name: Sanders

Email Address: Jasce.goldsmith@gmail.com

Affiliation:

Subject: OPPOSE

Comment:

Speaking for myself and household, we strongly OPPOSE the amendment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:32:38

No Duplicates.

## **Comment 98 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Roger

Last Name: Webster

Email Address: hedrums@gmail.com

Affiliation:

Subject: Comments on propose "Low Carbon Fuel Standard Amendments"

Comment:

Where to begin?

How about this: with China on a coal-fired power plant building spree with no end in sight, this latest madness from you folks will have no measurable effect on air quality or climate change, but it will add more then \$0.50 to the retail cost of a gallon of gasoline & diesel.

Have you completely lost your minds? This latest round of insanity is nothing more than a regressive tax, by definition imposed on those who can least afford it. And you're doing this while the governor is trying to punish oil companies for the high price of gasoline -- yet you want to make it worse!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:31:55

No Duplicates.

**Comment 99 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: We

Last Name: ThePeople

Email Address: Gofuckyourself@fuckyou.com

Affiliation:

Subject: Abolish the CARB

Comment:

You are all worthless cucks and should all lose your jobs for even thinking of taxes us even more than you already do. And I'm sure I speak for the majority of californians when I say, GO FUCK YOURSELVES!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:37:48

No Duplicates.

**Comment 100 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Lauren

Last Name: Porter

Email Address: Laurenporter@duck.com

Affiliation:

Subject: Oppose CARB gas hike

Comment:

CARB making a horrible decision for inflating/ adding on another gas hike. Desplicable and foolish. Leave the hard working Americans alone. We will find the 'others' monies that are in pockets rather than our state soon. Repent and start walking truthfully because it will get a bit uglier. Don't pass that hike.

Thank you.

Good luck

- LP

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:49:22

No Duplicates.

**Comment 101 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Christopher

Last Name: Amaya

Email Address: Amayachris1987@gmail.com

Affiliation:

Subject: CARB Rules that will affect gas prices.

Comment:

I am absolutely against this madness that the CARB is proposing that will raise gas prices. It is blatantly obvious that they do not care about the citizens of California and are only concerned with lining their own pockets. We already pay all this money for gas taxes and yet the roads are still in terrible shape. Stop lying to us and actually do something that will benefit us instead of hurting us...

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:52:34

No Duplicates.



**Comment 102 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Christopher

Last Name: Amaya

Email Address: Amayachris1987@gmail.com

Affiliation:

Subject: CARB Rules that will affect gas prices.

Comment:

I am absolutely against this madness that the CARB is proposing that will raise gas prices. It is blatantly obvious that they do not care about the citizens of California and are only concerned with lining their own pockets. We already pay all this money for gas taxes and yet the roads are still in terrible shape. Stop lying to us and actually do something that will benefit us instead of hurting us...

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 15:52:34

No Duplicates.

**Comment 103 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Renee

Last Name: Spigarelli

Email Address: Renee\_michelle@sbcglobal.net

Affiliation:

Subject: CARB gas increase

Comment:

The upcoming gas increase is preposterous. This legislature took a budget surplus and quickly turned it into a deficit based on out of control spending. And now the tax payers who already are dealing with huge inflation and an inability to keep up with increasing costs of food, utilities, etc are going to be subject to a crazy increase in gas. Our gas already is some of the most expensive in the country. Many people already have fled this state and you will continue to push people out based on unaffordability. This legislature pretends it is for the everyday people, but this is a huge burden for the citizens of this state. Shame on you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 16:14:10

No Duplicates.

**Comment 104 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Veronica

Last Name: Spencer

Email Address: Veronidg@usc.edu

Affiliation:

Subject: Proposed gas tax increase

Comment:

The neverending squeeze on Californians' wallets is exhausting. How can we survive like this? I am well educated, make a good living but still am starting to get crushed by the constant increases in gas, taxes, insurance. We already pay so much more for gas than other states so how can anyone in good conscience tell us it still is not enough? We cannot afford this. It should not even be on the table. This has to stop. You are driving people out of this state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 16:17:52

No Duplicates.

**Comment 105 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Joseph

Last Name: Garrett

Email Address: bg@thereefgroup.com

Affiliation:

Subject: Carb Gas Tax Increase

Comment:

We are struggling to make ends meet with the current inflation.  
This new tax is unreasonable and should be repealed. This gas tax  
will only increase the cost of everything as fuel is an aspect in  
almost every food and service.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 16:27:07

No Duplicates.

**Comment 106 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Mary

Last Name: Gordon

Email Address: gordonjeanne22@gmail.com

Affiliation:

Subject: CARB

Comment:

I am opposed to further taxes and price increases on our fuel. We are the highest of all states right now. I can barely afford to keep gas in my car. You continue to punish consumers. An approximate \$0.65 increase is unbelievable! Please evaluate carefully and consider your friends and neighbors who are struggling to make ends meet every month.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 16:13:41

No Duplicates.

**Comment 107 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Chuck

Last Name: Jones

Email Address: cej500@earthlink.net

Affiliation:

Subject: Higher Gas Prices

Comment:

California already has the highest gas prices in the United States and you have the unmitigated gall to even consider imposing higher prices on gas! Instead you should be helping the good people of California by removing the taxes while we are struggling to pay for groceries. You scumbags keep poking us in the forehead with your incompetence, waste and corruption asking for a fight.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 17:19:09

No Duplicates.

**Comment 108 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Tina

Last Name: Udell

Email Address: Trutkr27@aol.com

Affiliation:

Subject: Low Carbon Fuel

Comment:

No to another tax on gas!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 17:37:03

No Duplicates.

**Comment 109 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Tamara

Last Name: Allee

Email Address: stallee@sbcglobal.net

Affiliation:

Subject: Proposed amendments to low carbon fuel standards

Comment:

I urge you NOT to adopt this proposed low carbon fuel standard amendment!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 17:39:19

No Duplicates.



**Comment 110 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Greg  
Last Name: Hanoian  
Email Address: ghanoian25@gmail.com  
Affiliation:

Subject: CARB tax increase  
Comment:

Dear CARB,

I oppose the increased gas tax possibly coming up. Our air is as clean as it's ever been and we are taxed enough as it is living in CA.

Sincerely,

Greg Hanoian

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 17:51:08

No Duplicates.

## **Comment 111 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Aubrey

Last Name: O'Boyle

Email Address: aubreyoboyle@yahoo.com

Affiliation:

Subject: Increase in Gas prices

Comment:

We as the people of California already pay exorbitant gas prices, more than any of those in our surrounding states. If you care at all for the people that you are supposed to represent you will not increase the price is in a time like now. With inflation on every day goods still hurting those who claim to care about most minority and lower income families, and gas prices amongst the highest in the nation. It is unacceptable that this is even coming up as an option. don't tax people on gas.! don't take essential every day goods and make them a play toy for you to gain more money to spend without a thought! this tax increase coming up, shows your lack of awareness for those that live in your state, with the highest home prices, the highest gas prices, and some of the highest energy prices you are driving more U-Haul sales out of state with every allowance of these types of measures. put the people before your pocketbooks and say no to this increase in gas taxes!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 17:56:24

No Duplicates.

## **Comment 112 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Penny  
Last Name: Harrington  
Email Address: penny.harrington@cox.net  
Affiliation:

Subject: Enough is enough  
Comment:

Ladies and gentlemen:

I implore you to oppose any increase to the gas tax in our state. We are already paying more than most other locales and just can't endure even higher prices at the pump.

The middle and lower classes are already hard-hit with inflated prices for groceries and other goods, and this will only get worse if fuel charges for moving goods from manufacturers and growers to retail sellers increase the prices of food and necessities.

Seniors on fixed incomes have no discretionary income to cover additional fuel charges. Workers can ill afford to pay more just for their commute.

Please do the right thing for Californians and stop the gas tax hike. Enough is enough.

Respectfully submitted...

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 18:17:08

No Duplicates.

**Comment 113 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Martha

Last Name: Kerstner

Email Address: mkerstner@gmail.com

Affiliation:

Subject: CARBs plan to raise gas prices

Comment:

We can NOT afford to pay more for gas! Do not add more taxes and fees to our gas!!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 18:21:14

No Duplicates.

**Comment 114 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Bettina

Last Name: Miller

Email Address: Bloominbee123@icloud.com

Affiliation:

Subject: Carb Gas tax increase

Comment:

I am infuriated and opposed to this gas tax increase.. why are we the people paying for Sacramento's incompetence??? Robbing Peter to pay Paul is all you seem to be capable of doing..

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 18:31:11

No Duplicates.

**Comment 115 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Carla

Last Name: Birmingham

Email Address: Carlab32@gmail.com

Affiliation:

Subject: Taxes on gas

Comment:

It beyond me how you want to put even more taxes on gasoline. It extremely irresponsible to the people of California. Our reputation in CA is n jeopardy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 19:37:06

No Duplicates.

**Comment 116 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Cherie

Last Name: Doudna

Email Address: cheriedoudna@gmail.com

Affiliation:

Subject: Gas hike

Comment:

I oppose any and all gas prices increase for any and all reason and  
any and all times.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 19:54:56

No Duplicates.

**Comment 117 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Matthew

Last Name: Kelly

Email Address: mattkelly1875@gmail.com

Affiliation:

Subject: Gas tax increase

Comment:

You are squeezing us for all we're worth and driving even more people from this state. Stop killing your middle class this is untenable. We are more than just your tax slaves.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 19:58:25

No Duplicates.



**Comment 118 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Cynda

Last Name: Ontiveros

Email Address: Cyndaontiveros@gmail.com

Affiliation:

Subject: I strongly OPPOSE the increase in gas prices due to your latest ruling

Comment:

This decision to further micromanage the gas industry is a new level of our state's mismanagement. We already have the highest gas prices in the nation and increasing the cost of gas by 65 MORE cents per gallon is criminal. Democrats purport to care about the "little guy"-- the working poor and the middle class- and all you are doing is purposely making life more difficult for anyone who drives a gas powered vehicle. Our state has nowhere near the infrastructure to maintain and increase the number of electric vehicles so your campaign to punish those of us who still use gas is insane..The level of arrogance and blind party-politics is truly reprehensible!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 19:59:50

No Duplicates.

**Comment 119 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Karla

Last Name: Curiel

Email Address: Karlm2007@hotmail.com

Affiliation:

Subject: Gas prices

Comment:

Raising gas prices will put an additional strain on families like mine. Please reconsider!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 20:11:03

No Duplicates.

**Comment 120 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Mathilda

Last Name: Dickey

Email Address: mdickey63@gmail.com

Affiliation:

Subject: Gas prices

Comment:

Enough is enough. Stop making the workers in California slaves with your gas prices for your crazy woke policies. It should be voluntary and you'll see what people think of your policies. You son be happy til every tax payer leaves California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 20:34:39

No Duplicates.

**Comment 121 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Rita

Last Name: Tayenaka

Email Address: rita@rita4homes.com

Affiliation:

Subject: GAS TAX

Comment:

WE NEED TO STOP THIS GAS TAX - OUR GAS IS CRAZY HIGH ALREADY- WHY  
DO YOU NEED MORE TAXES. STOP

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 20:45:18

No Duplicates.

**Comment 122 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Wyndy

Last Name: Nichols

Email Address: macawyndy@yahoo.com

Affiliation:

Subject: Opposed to increase refinery fees

Comment:

Hello, I am writing as a citizen of California to oppose the increased fee stated above. California already has the most expensive gas in the nation and with the way this state is going increasing fees that will be passed on to taxpayers at the pump doesn't make sense. California government continues to increase fees and taxes only for the middle class to shrink. Please rethink adding additional fees that take money out of hard working taxpayers.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 20:51:17

No Duplicates.

**Comment 123 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: David

Last Name: Fults

Email Address: Dafults@gmail.com

Affiliation:

Subject: stricter limits on the carbon intensity of fuels

Comment:

I oppose stricter limits on the carbon intensity of fuels.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 21:05:30

No Duplicates.

**Comment 124 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Todd

Last Name: Swanson

Email Address: Swanytodd@hotmail.com

Affiliation:

Subject: Gas tax

Comment:

WE CAN NOT AFFORD HIGHER GAS PRICES!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 21:23:37

No Duplicates.

**Comment 125 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Kerry

Last Name: Wigginton

Email Address: kwig6@hotmail.com

Affiliation:

Subject: Gas price increase

Comment:

We are hurting already to put food on the table and gas in our cars. Poor handling of our tax dollars does not give you the right to gouge us with higher gas prices. Vote no on any gas pricing increases that will hurt we the people.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 21:23:07

No Duplicates.



**Comment 126 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Charity

Last Name: Sy

Email Address: pylorix@yahoo.com

Affiliation:

Subject: CARB law

Comment:

Please do not raise our gas tax again! Californian's already pay the highest gas prices, rent/mortgage, taxes in the nation. Average working citizen's are struggling.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 21:27:08

No Duplicates.

**Comment 127 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Michael

Last Name: Kupferstein

Email Address: arosesshadow@gmail.com

Affiliation:

Subject: Unconstitutional Taxing of gas

Comment:

You cannot in your wildest dreams defend with reason why we should allow you to raise our gas taxes even more, again! On top of the multiple raises this past year and every single July even during Covid, most states repealed and or credited their people for the unjust living expenses already being dealt with. We the People will not stand idly by and be stuck with yet another tax hike on our already most insane prices in the country. Cease and desist with this nonsense. Please!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 21:27:12

No Duplicates.

**Comment 128 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Pino

Last Name: Bogedahl

Email Address: Pino.001@hotmail.com

Affiliation:

Subject: New oil regulations proposal

Comment:

Please, stop adding more oil regulations that will potentially  
higher the gas prices.

Gas is already extremely expensive here in California. If you  
really care about the people of California, you need to stop this  
maddeness, we can't take this high prices anymore.

Sincerely,  
Pino Bogedahl

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 21:34:56

No Duplicates.

**Comment 129 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jacob  
Last Name: Bogedahl  
Email Address: Jbogedahl@live.com  
Affiliation:

Subject: Stop the insanity  
Comment:

Please stop the insanity.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 21:45:25

No Duplicates.

**Comment 130 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Kellie

Last Name: Pauley

Email Address: teampauley@comcast.net

Affiliation:

Subject: California gasoline taxes

Comment:

We already pay too high of gasoline taxes in California.

I urge the California government to oppose any new gasoline taxes.

My home state is unrecognizable and far too expensive.

Please represent your constituents and the hard working citizens of California.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 21:50:20

No Duplicates.

**Comment 131 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Rebecca

Last Name: Rodriguez

Email Address: Rebeccar424@gmail.com

Affiliation:

Subject: Opposition to proposed gas tax

Comment:

Gas is already too expensive - NO to additional taxes

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 22:10:04

No Duplicates.

**Comment 132 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Tate

Last Name: Aslanjan

Email Address: tatkatatka@yahoo.com

Affiliation:

Subject: Gas price increase

Comment:

We have one of the highest gas prices in the country. Why is this price increase is necessary? I vote against

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 22:09:59

No Duplicates.

**Comment 133 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Erica

Last Name: Villa

Email Address: Missericavilla@gmail.com

Affiliation:

Subject: Stop Gas increase

Comment:

Stop increasing our gasoline! I can barely afford my life.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 22:12:19

No Duplicates.



**Comment 134 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Tanya  
Last Name: Spangler  
Email Address: tanyaspence@yahoo.com  
Affiliation:

Subject: No ride to gasoline prices  
Comment:

I am against a rise in gasoline prices.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 22:12:58

No Duplicates.

## **Comment 135 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Kalop

Last Name: Harvey

Email Address: kalopharvey@gmail.com

Affiliation:

Subject: New rule that could raise fuel prices .45-.65

Comment:

This will have dire consequences on the citizens of California.  
We already pay some of the HIGHEST FUEL PRICES in the country due to having one of the highest fuel taxes in the country.  
We pay almost the highest income taxes in the country, top to bottom not just the wealthy.  
Food prices are up about 50-75%  
Housing costs are up nearly 100% over two years ago.  
We cannot sustain a rule change on behalf of unelected bureaucrats, that have ZERO accountability to the people that will affect fuel costs in a state that relies heavily on transportation for commuting.  
You have ZERO right to create rules that will affect the costs of products on people who did not elect you to create rules/laws.  
.  
We have a legislation to create rules and laws, you are not part of that body and should not have the ability to CREATE new rules on a whim.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 22:20:51

No Duplicates.

**Comment 136 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Johana

Last Name: Delgado

Email Address: johana.pat@gmail.com

Affiliation:

Subject: Oppose CARB gas tax increase

Comment:

I vehemently oppose CARB increasing the gas tax with its rule.  
Californians already pay ungodly pricing at the pump that no other  
states do.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 22:33:50

No Duplicates.

**Comment 137 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: annie

Last Name: clougherty

Email Address: annieriggs@hotmail.com

Affiliation:

Subject: gas tax

Comment:

To whom it may concern,

As a lifelong Californian, I have become aware how much you are taxing us. California does not show the taxes on our receipts for the gas that we pay and to increase any further our gas tax is absolutely ridiculous. You cannot continue to tax us like this! We are the highest state tax by gas in the entire country. We are aware of what is occurring. This needs to stop now.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 22:32:41

No Duplicates.

**Comment 138 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Debra

Last Name: Cummings

Email Address: [debra@sanddesign.com](mailto:debra@sanddesign.com)

Affiliation:

Subject: Gas prices

Comment:

No more gas price himes

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 22:40:16

No Duplicates.

**Comment 139 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Venessa

Last Name: Meza

Email Address: vingabe0711@aol.com

Affiliation:

Subject: Do not raise our gas prices

Comment:

We already pay the most for gas in this country. The economy is horrible, everybody is paying more and more for every day items, and despite already paying high gas prices, you want to increase that already high price!? Please do not do this to the citizens of California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 23:42:28

No Duplicates.

**Comment 140 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Philipp

Last Name: Lomboy

Email Address: phil.lomboy@gmail.com

Affiliation:

Subject: Enough gas increases

Comment:

Stop with all the regulation that is driving gas prices through the roof. You are hurting the people of CA with your bureaucratic power grabs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 00:19:44

No Duplicates.

**Comment 141 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Lara Lei

Last Name: Bailey

Email Address: Laraleibailey@yahoo.com

Affiliation:

Subject: Gas tax?!!

Comment:

I am strongly against any further taxes on gasoline! As a matter of fact you need to roll back some of the taxes that already exist!!  
Our gas prices are RIDICULOUS!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 02:02:37

No Duplicates.



**Comment 142 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Mari

Last Name: Valluzzi

Email Address: Mvalluzzi14@gmail.com

Affiliation:

Subject: Opposition to amendment

Comment:

I am opposed to any amendment that would further increase the gas tax. CA has been leading the nation in the most expensive gas prices for far too long. We don't need another amendment that would keep the gas prices high. It's too hard to live in CA as it is currently, you should be trying to help your residents, not making it harder.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 07:09:28

No Duplicates.

**Comment 143 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jessica

Last Name: Hekman

Email Address: jesshekman@hotmail.com

Affiliation:

Subject: Please do not raise gas prices

Comment:

We are already taxed to death and struggling in California. I am very much against more unnecessary taxes on gas. No more gas taxes.

We already pay so many taxes on gas which is why California has the highest gas prices by far.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 07:29:48

No Duplicates.

**Comment 144 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jeremy

Last Name: Mattson

Email Address: mattsonjt69@gmail.com

Affiliation:

Subject: Vote NO on additional refinery fees

Comment:

You are not an elected board. The only taxes and fees that should be raised are by the vote of the people. Vote NO on any additional fees or taxes placed on the refinery. This includes other EPA and air quality requirements as well. You should not have the power to create any regulations that raise anybody's fees or taxes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 07:44:42

No Duplicates.

**Comment 145 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Gina

Last Name: Martin

Email Address: haybalers@msn.com

Affiliation:

Subject: DON'T raise gas tax

Comment:

Please do NOT raise the gas tax. This may not affect the upper income class but it is horrible for the poorest of our population. It not only increases the cost to fill our tanks but will ripple through costs for small businesses. This in turn increases the costs of goods for everyone. PLEASE DO NOT RAISE OUR TAXES ON GAS  
!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 07:44:43

No Duplicates.

**Comment 146 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Joseph

Last Name: Villanueva

Email Address: scorp16j@aol.com

Affiliation:

Subject: No to the new gas increase

Comment:

Stop! Stop raising the price of gas. It is outrageous and it needs to stop! In the words of our President and Vice President, "Don't!" Stop making our lives worse in this state!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 08:42:47

No Duplicates.

## **Comment 147 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Jessica

Last Name: McMann

Email Address: jn.mcmann@hotmail.com

Affiliation:

Subject: NO

Comment:

Californians already pay the highest gas taxes in the country, raising them even more is going to ultimately create a bigger purge of people fleeing this collapsing state. Less people=less tax revenue. This move to try and force citizens to all electric vehicles is futile, under the guise of "reducing carbon emissions". There aren't enough resources for it to be sustainable, which is already apparent when the government asks people not to charge their vehicles because of the burden on the grid. It makes absolutely no sense. How about we set it motion standards for the taxes that are already collected to be spent in a responsible manner?

Your entity was not elected by the people.

No more wasteful spending

No more taxes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 09:14:59

No Duplicates.

**Comment 148 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Wendy

Last Name: Diaz Delgado

Email Address: gdsgrl88@hotmail.com

Affiliation:

Subject: Opposed

Comment:

Please consider the cost of living in California. This will  
increase gas costs to the public that is already suffering

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 09:45:06

No Duplicates.

**Comment 149 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Ann

Last Name: Woods

Email Address: Awoods270@hotmail.com

Affiliation:

Subject: Amendment to raise taxes

Comment:

Do not raise our gas taxes. California has an extremely high gas  
tax already!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 10:34:39

No Duplicates.



**Comment 150 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Randy

Last Name: Woods

Email Address: Rwoods270@hotmail.com

Affiliation:

Subject: Amendment to raise gas taxes

Comment:

Our gas taxes are already a National joke! Do NOT raise the gas tax!

Perhaps consider reducing spending???

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 10:39:16

No Duplicates.

**Comment 151 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: catherine

Last Name: salaiz

Email Address: katesalaiz@gmail.com

Affiliation:

Subject: gas tax

Comment:

I strongly oppose any gas tax to be implemented for any Californians. We already pay the highest gas in the nation, yet see little Benefit from these tax hikes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 10:45:59

No Duplicates.

**Comment 152 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Alison

Last Name: Riley

Email Address: harriedmom@gmail.com

Affiliation:

Subject: Raising fuel prices

Comment:

Dear Board Members,

As a teacher who has to commute to work daily ( as home prices mostly prohibit service people from living near their work) higher gas prices will be quite detrimental. If your goal is to push people to leave California you are succeeding. My court in Gilroy has lost several households to Idaho and Texas. Please let us stay in California and keep teaching. Do not add more taxes to those who do not have a choice to not commute.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 12:02:29

No Duplicates.

**Comment 153 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Wes

Last Name: Morgan

Email Address: wes-morgan@sbcglobal.net

Affiliation:

Subject: Low carbon standards

Comment:

I am against the carbon reduction proposal that will increase gas prices by as much as 65 cents per gallon. Please remove this from any future action.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 12:12:29

No Duplicates.

**Comment 154 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Lynne

Last Name: Morgan

Email Address: lynne.c.morgan@sbcglobal.net

Affiliation:

Subject: Low carbon standards

Comment:

I am against the carbon reduction proposal that will increase gas prices by as much as 65 cents per gallon. Please remove this from any future action.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 12:12:29

No Duplicates.

**Comment 155 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Allison

Last Name: B

Email Address: H2obabe12@yahoo.com

Affiliation:

Subject: Gas tax

Comment:

The idea of raising the highest gas tax in the United States even more during one of the biggest inflation and recession times in recent history is absolutely insane. Vote no on this. It is a must. When people wonder why California is losing this is exactly the reason. Do better managing the revenue from the current gas tax instead of inflicting more financial pain on residence that can't afford it

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 13:01:53

No Duplicates.

## **Comment 156 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Aracely

Last Name: Covarrubias

Email Address: Covarrubias.aracely@gmail.com

Affiliation:

Subject: Opposition to proposed gas price increase due to New Rule

Comment:

Dear CARB Board Members,

I am writing to express my strong opposition to the proposed rule that could increase gas prices by an additional 45-65 cents per gallon. I believe this measure will disproportionately impact working-class families, small businesses, and rural communities who rely on affordable fuel for daily life.

In an already expensive state, a significant gas price hike will exacerbate the financial burden on Californians struggling with high living costs. Increased transportation costs will also drive up the price of essential goods and services, further harming those who can least afford it. For many residents, public transportation or electric vehicle options are either unavailable or financially out of reach, making gasoline a necessity, not a choice.

Additionally, California has the highest gas taxes in the nation, and the proposed rule seems to overlook the cumulative economic strain already placed on residents. I believe CARB can pursue its environmental goals through alternative means that do not place such an immediate financial burden on families and businesses.

I urge CARB to consider solutions that balance environmental objectives with the economic well-being of all Californians, such as further investment in sustainable fuel research, incentivizing cleaner technologies.

Thank you for your attention to this important matter.

Sincerely,

Aracely Covarrubias

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 13:22:22

No Duplicates.

**Comment 157 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Helena

Last Name: Parker

Email Address: hparkr@gmail.com

Affiliation:

Subject: Enough is enough

Comment:

CA residents can't afford any more taxes. Find the money elsewhere.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 13:28:24

No Duplicates.



## **Comment 158 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Rebecca

Last Name: Oriol

Email Address: oriolrebecca.bchs@gmail.com

Affiliation:

Subject: Higher Prices

Comment:

To the Esteemed Unelected Board,

It's time to take a pause on new measures that lead to higher prices of an everyday necessity. The California economy is already too expensive for most people who live here, and adding another 45-65 cents per gallon of gas is ludicrous and out of touch with the reality of everyday Californians.

Vote 'no' and give Californians a break. We need it.

Thanks,

A tired voter and taxpayer

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 13:33:43

No Duplicates.

**Comment 159 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jessica

Last Name: Godde

Email Address: jessicagodde@gmail.com

Affiliation:

Subject: I oppose

Comment:

I oppose any additional taxes and price increases for gasoline and diesel. Maybe California should manage their funds better instead of taxing citizens out of their hard earned income that's forcing many to leave the state altogether. Enough is enough.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 13:41:11

No Duplicates.

**Comment 160 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Julie

Last Name: Morgan

Email Address: Juliemorgan01@yahoo.com

Affiliation:

Subject: Gas price increase again!

Comment:

I'm against any new has increases and please repeal the already  
\$1.08 tax on our had in california. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 14:16:23

No Duplicates.

## **Comment 161 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Kerry

Last Name: Johnson

Email Address: Kerrymjohnson@gmail.com

Affiliation:

Subject: Gas tax increase

Comment:

To whom it may concern:

As a resident of California, I am deeply opposed to the gas tax increasing. Our state currently pays the most in the country for gas. If other states can off gas for less money, why then do lawmakers perpetually want to tax their constituents more for gas? It feels a lot like taxation without representation, not unlike the taxation without representation with which the Founders dealt.

Please remember you serve the people of this great State. Many voices are speaking up in oppositio to this gas tax, like mine.

Thank you for your time.

Kerry Johnson

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 14:57:12

No Duplicates.

**Comment 162 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: CHRIS

Last Name: BRIMHALL

Email Address: brimmie1608@gmail.com

Affiliation:

Subject: Tax increase

Comment:

As a life long Californian and senior I must protest the continued  
taxation of California citizens. Stop taxing us incessantly and cut  
spending

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 16:03:44

No Duplicates.

**Comment 163 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Daniel

Last Name: Gewickey

Email Address: chasing\_the\_son\_86@hotmail.com

Affiliation:

Subject: Proposed Low Carbon Fuel Standard Amendments (lcfs2024)

Comment:

Don't you DARE add more taxes and make gas prices worse than they  
already are!!!

No one can afford anything in CA as it is, and adding more taxes  
will only make things worse. Stop with the nonsense, and find ways  
to CUT taxes, not raise them.

Sincerely,

A Normal Person trying to survive.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 21:54:42

No Duplicates.

**Comment 164 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jacquelyn

Last Name: Landreth

Email Address: Jackie@Jlandreth.com

Affiliation:

Subject: Do not raise gas prices again

Comment:

Do not raise gas prices again. The people of California are already suffering with the highest gas prices in the nation, mainly due to gas taxes. Please figure out how to streamline the many agencies so the taxes already being charged can more efficiently and effectively be spent. Living in California is becoming more and more intolerable with the huge inflation and constantly increasing taxes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-13 12:24:06

No Duplicates.

## **Comment 165 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Doug

Last Name: Padgett

Email Address: doug@totallykids.com

Affiliation:

Subject: Proposed Low Carbon Fuel Amendments

Comment:

I understand you are proposing amendments to the Low-Carbon Fuels Standard (LCFS) program. I urgently request you delay the vote until updated cost projections are provided to the public. The carbon emitted by the ships bringing foreign oil to our state FAR EXCEEDS the carbon emitted by all our vehicles in this state combined, yet you are forcing our oil wells and refineries IN THIS STATE to restrict their utilization and capacity. This process is costing me dearly at the gas pump. Now you want to make it worse with your amendments, without due consideration to the impact on me and all of us as citizens.

Reconsider your policies at every level and bring back robust IN-STATE oil production.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-16 04:19:02

No Duplicates.



**Comment 166 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Graham  
Last Name: Noyes  
Email Address: graham@noyeslawcorp.com  
Affiliation: NLC for CleanFuture

Subject: Comments of CleanFuture RE: 2nd 15-day Changes  
Comment:

Dear Clerk of the Board,

Attached please find the comments of CleanFuture regarding the second notice of modified text for the Proposed Low Carbon Fuel Standard amendments (lcfs 2024). These comments address the True-Up Provision in particular.

If there are any questions or issues regarding this comment, please contact me.

Best Regards,

Graham Noyes  
Noyes Law Corporation  
419 Broad Street, Suite E  
Nevada City, CA 95959  
www.fuelandcarbonlaw.com  
(530)264-7157 Direct  
graham@noyeslawcorp.com

Attachment: [www.arb.ca.gov/lists/com-attach/7803-lcfs2024-UyVRJVYwV2dQCm0d.pdf](http://www.arb.ca.gov/lists/com-attach/7803-lcfs2024-UyVRJVYwV2dQCm0d.pdf)

Original File Name: CleanFuture 2nd 15-day Comment FINAL.pdf

Date and Time Comment Was Submitted: 2024-10-16 12:45:53

No Duplicates.

**Comment 167 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Asher

Last Name: Goldman

Email Address: asher@generatecapital.com

Affiliation: Generate Capital

Subject: Generate Capital Comments on Proposed Amendments to LCFS

Comment:

Please see the attached comments from Generate Capital on the  
proposed amendments to the LCFS program

Attachment: [www.arb.ca.gov/lists/com-attach/7806-lcfs2024-BmJCa1YlW2kiem0d.pdf](http://www.arb.ca.gov/lists/com-attach/7806-lcfs2024-BmJCa1YlW2kiem0d.pdf)

Original File Name: Generate Capital Comments on LCFS\_10.16.2024\_vF.pdf

Date and Time Comment Was Submitted: 2024-10-16 13:18:36

No Duplicates.

**Comment 168 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Brian

Last Name: McDonald

Email Address: bcmcdonald@marathonpetroleum.com

Affiliation:

Subject: MPC Comments on CARB LCFS 2nd 15-day proposal

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7808-lcfs2024-AGUQNVE4BDoAZM0d.pdf](http://www.arb.ca.gov/lists/com-attach/7808-lcfs2024-AGUQNVE4BDoAZM0d.pdf)

Original File Name: CARB LCFS Proposed Regulation Comments\_2nd 15 day.pdf

Date and Time Comment Was Submitted: 2024-10-16 13:24:06

No Duplicates.

**Comment 169 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jeremy

Last Name: Martin

Email Address: [jmartin@ucsusa.org](mailto:jmartin@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: UCS Comments on LCFS October 15-day changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7809-lcfs2024-VTkAZ1RnV2FRIm0D.pdf](http://www.arb.ca.gov/lists/com-attach/7809-lcfs2024-VTkAZ1RnV2FRIm0D.pdf)

Original File Name: UCS Oct 15 day comments.pdf

Date and Time Comment Was Submitted: 2024-10-16 13:30:42

No Duplicates.

**Comment 170 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Orran

Last Name: Balagopalan

Email Address: obalagopalan@smwlaw.com

Affiliation:

Subject: Leadership Counsel for Justice and Accountability Comments on 2nd Notice of  
Availability

Comment:

Attached please find comments submitted by the offices of Shute,  
Mihaly & Weinberger LLP on behalf of the Leadership Counsel for  
Justice and Accountability Regarding the Second Notice of  
Availability of Proposed Modifications to the LCFS.

Attachment: [www.arb.ca.gov/lists/com-attach/7829-lcfs2024-ADJQYVdkBDpGYM0D.pdf](http://www.arb.ca.gov/lists/com-attach/7829-lcfs2024-ADJQYVdkBDpGYM0D.pdf)

Original File Name: Leadership Counsel et. al. Comments on the Second Additional  
Modification to the Proposed Amendments to the Low Carbon Fuel Standard(1837160.4).pdf

Date and Time Comment Was Submitted: 2024-10-16 14:40:28

No Duplicates.

**Comment 171 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Kent

Last Name: Leacock

Email Address: kent.leacock@mainspringenergy.com

Affiliation:

Subject: Mainspring Energy Comments on Proposed LCFS Amendments (2nd 15-Day Changes)

Comment:

Please see the attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/7841-lcfs2024-Uj5SMQFIWwtWMM0d.pdf](http://www.arb.ca.gov/lists/com-attach/7841-lcfs2024-Uj5SMQFIWwtWMM0d.pdf)

Original File Name: CARB LCFS Letter\_Mainspring\_Final (002).pdf

Date and Time Comment Was Submitted: 2024-10-16 15:03:28

No Duplicates.

## **Comment 172 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Rana

Last Name: Sarkar

Email Address: justin.currie@international.gc.ca

Affiliation: Government of Canada

Subject: Canada's Comments on Proposed Changes to Low Carbon Fuel Standards (biofuels)  
Comment:

The Honorable Liane M. Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Proposed Amendments to the California Low Carbon Fuel Standard

Dear Chair Randolph,

Canada appreciates the opportunity to submit the following comments on the proposed amendments to the California Low Carbon Fuel Standard (LCFS). Canada is writing today to express concerns with the proposed amendments as they relate to oilseed feedstocks.

Canada and California share a longstanding and strong agricultural trading relationship, with bilateral trade in 2023 totaling USD \$9 billion. California exported USD \$4.9 billion to Canada in 2023, making Canada the state's top agriculture and agri-food export market. One of Canada's top exports to California is canola oil, with California importing USD \$525 million worth of Canadian canola oil in 2023, a portion of which would have been used for biofuel production. In 2023, 15% of Canada's canola oil was exported to California and represented 95% of all canola imported to the state of California. Similarly, Canada is one of the top exporter of soybeans seeds into California, a portion of which may be processed further into biomass-based diesel production. Like California, Canada recognizes the valuable opportunities to reduce the lifecycle greenhouse gas emissions of biofuels, including by adopting climate smart agricultural practices. Canada supports harnessing innovative solutions that encourage and reward the adoption of sustainable practices by producers while pursuing our shared sustainability objectives. Clean fuels create jobs, support rural communities and provide opportunities for a more sustainable future.

Canada supports the production and use of low-carbon fuels, including agricultural biofuels, through the Canadian Clean Fuel Regulations (CFR). The Land Use and Biodiversity (LUB) criteria are incorporated into the CFR to ensure the sustainability of biofuel feedstocks and prevent adverse land use and biodiversity impacts related to cultivation and harvesting. This LUB Criteria recognizes the strong sustainability record of Canadian and U.S. farmers. Under the CFR, Canadian and U.S. agricultural feedstocks are deemed compliant with Land Use and Biodiversity criteria, through Legislative Recognition and recognition of the US EPA aggregate compliance approach. The LUB criteria set requirements that must be met for participation in the CFR. The LUB criteria aim to reduce cost and administrative burden for farmers and the agricultural supply chain by leveraging existing mechanisms and regulations within respective

jurisdictions through Legislative Recognition and aggregate compliance. Canada believes that the LUB criteria sufficiently meets the sustainability objectives that California's proposed amendments would require.

Canada is concerned with California's proposed amendments to limit credit creation for canola, soybean, and sunflower oilseeds to twenty percent of total biomass-based diesel annual production per company. The twenty percent limit being proposed appears to be arbitrary and duplicative of carbon intensity scoring, especially due to the lack of transparent, science-based justification or data supporting these limitations. Likewise, the choice of canola, soybean, and sunflower oilseeds appears contrary to the significant amount of data globally that highlights the critical role of oilseed feedstocks in reducing emissions.

To ensure reliable and stable trade, Canada supports policy development that is transparent, science-based, recognizes the highly integrated nature of the North American agricultural sector, reduces administrative burden on our supply chains and minimizes trade disruptions. Due to the size and scale of the California market, limiting feedstocks in California biofuel production could have unforeseen impacts on North American's supply chain and markets. Canadian oilseeds are exported to California for further processing and value-added use, creating and sustaining high paying jobs that contribute to the implementation of California's energy policy objectives. Canada is concerned that without the recognition of national approaches (e.g. Canada's Clean Fuel Regulations or the U.S. Renewable Fuel Standard), California's amendments will create a disruptive sub national patchwork of regulations that would negatively impact the biofuel market and undermine our shared commitment to sustainability. To avoid potential economic impacts from misalignment and to ensure continued growth, it is important that California promote ongoing collaboration, coordination, and consistency with internationally recognized standards and their close trading partners such as Canada.

To avoid inadvertently minimizing the effectiveness of the biofuel sector, Canada suggests that California consider the two following LCFS amendments:

- Remove the twenty percent limitations on biomass-based diesel produced from soybean, canola, and sunflower oil.

- Reduce administrative burden and support the recognition of Canadian oilseed in compliance with the CFR LUB criteria that is consistent with California's proposed sustainability certification requirement.

Should California proceed with certification requirements on oilseeds, Canada would appreciate additional guidance on implementation to assist in streamlining the requirements, especially as it relates to the biomass input geographic shapefiles and coordinates of plot boundaries.

To discuss this important issue, Canada would like to request a meeting with Chair Randolph prior to the final approval of the proposed amendments to the LCFS.

Canada thanks California for the opportunity to submit comments and looks forward to further information sharing, collaboration, and coordination on this important topic.

Should you have any questions, please contact

Holly.McCoubrey@agr.gc.ca

Sincerely,

-----  
Michelle Cooper  
Director General



Market Access Secretariat  
Agriculture and Agri-Food Canada

-----  
Rana Sarkar  
Consul General of Canada  
Head of Mission  
Canadian Consulate of San Francisco

Attachment: [www.arb.ca.gov/lists/com-attach/7848-lcfs2024-BWZdOVdkUGoAZM0d.pdf](http://www.arb.ca.gov/lists/com-attach/7848-lcfs2024-BWZdOVdkUGoAZM0d.pdf)

Original File Name: Canada Comments on Proposed Changes to Low Carbon Fuel Standards  
October 16 2024.pdf

Date and Time Comment Was Submitted: 2024-10-16 16:01:14

No Duplicates.

**Comment 173 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Cassandra  
Last Name: Farrant  
Email Address: cfarrant@ampamericas.com  
Affiliation: Amp Americas

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

Amp America appreciates the opportunity to submit comments in  
response to the second proposed Low Carbon Fuel Standard  
Amendments.  
Please see our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/7900-lcfs2024-VTkAY1YIA2QCKM0D.pdf](http://www.arb.ca.gov/lists/com-attach/7900-lcfs2024-VTkAY1YIA2QCKM0D.pdf)

Original File Name: Amp Second Proposed LCFS 15-Day Admendments Comment Letter.pdf

Date and Time Comment Was Submitted: 2024-10-16 17:35:03

No Duplicates.

**Comment 174 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Nina

Last Name: Robertson

Email Address: nrobertson@earthjustice.org

Affiliation:

Subject: Comments of Earthjustice, CBD, APEN and CBD

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/7922-lcfs2024-USNW0lxvA2EDNm0D.pdf](http://www.arb.ca.gov/lists/com-attach/7922-lcfs2024-USNW0lxvA2EDNm0D.pdf)

Original File Name: Second\_15-day\_Comment\_Letter-Final-Earthjustice CBE APEN CBD.pdf

Date and Time Comment Was Submitted: 2024-10-16 19:09:17

No Duplicates.

**Comment 175 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Francis "Terry"

Last Name: Molloy

Email Address: ftmolloy66@hotmail.com

Affiliation:

Subject: Gas Prices

Comment:

The continued lack of empathy in regards to the continued taxation on gasoline is phenomenal. You are crushing us with artificial increases and it bring the State to a grinding economic halt.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 19:03:24

No Duplicates.

**Comment 176 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: James

Last Name: Collins

Email Address: jic2068@gmail.com

Affiliation:

Subject: Gasoline tax

Comment:

I feel this is like a double edged sword. Larger tax should reduce consumption but obviously increase costs. If we all drive less this helps improve air quality and increased taxes SHOULD be used to benefit road conditions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 19:10:37

No Duplicates.

**Comment 177 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Ron

Last Name: May

Email Address: rdmay32252@gmail.com

Affiliation:

Subject: Another gas tax? YIKES

Comment:

The governor of CA is not in touch with the citizens of this state!  
I'm happy he can afford essentials, but many cannot! We already pay  
the highest taxes and have endured terrible inflation. Please  
consider repeal of the last gas tax and prevent further taxes!  
Seniors and many others are suffering!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 21:26:31

No Duplicates.

**Comment 178 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Bill

Last Name: Hayden

Email Address: pbhome@cox.net

Affiliation:

Subject: Gas tax

Comment:

The state doesn't have budget problem, just a spending problem.  
You can just keep adding taxes to our fuel cost, this will hurt the  
lower income and retirees.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-11 21:57:13

No Duplicates.

**Comment 179 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: JOHN

Last Name: HAYWOOD

Email Address: jackhaywood@hotmail.com

Affiliation:

Subject: Increase in Gasoline tax

Comment:

I am retired on a fixed income and the proposed increase in tax would cause financial hardship for me. Please don't increase the gas tax. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 11:25:05

No Duplicates.



**Comment 180 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: wes

Last Name: Morgan

Email Address: wes-morgan@sbcglobal.net

Affiliation:

Subject: CARB legislation

Comment:

I am against the carbon reduction proposal that will increase gas prices by as much as 65 cents per gallon. Please remove this from any future action.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 12:07:33

No Duplicates.

**Comment 181 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Lynne

Last Name: Morgan

Email Address: lynne.c.morgan@sbcglobal.net

Affiliation:

Subject: CARB legislation

Comment:

I am against the carbon reduction proposal that will increase gas prices by as much as 65 cents per gallon. Please remove this from any future action.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-12 12:07:33

No Duplicates.

**Comment 182 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jim  
Last Name: Duffy  
Email Address: duffje@msn.com  
Affiliation:

Subject: AAM  
Comment:

Please see attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/1-lcfs2024-2nd15day-BmJcLwNkBTHeFAP.pdf](http://www.arb.ca.gov/lists/com-attach/1-lcfs2024-2nd15day-BmJcLwNkBTHeFAP.pdf)

Original File Name: Duffy\_LCFS\_2nd\_15-Day\_AAM\_Comments.pdf

Date and Time Comment Was Submitted: 2024-10-18 10:22:32

No Duplicates.

**Comment 183 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jim  
Last Name: Duffy  
Email Address: duffje@msn.com  
Affiliation:

Subject: LCFS  
Comment:

Please see attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/2-lcfs2024-2nd15day-VjJSIVE2VWADfFcI.pdf](http://www.arb.ca.gov/lists/com-attach/2-lcfs2024-2nd15day-VjJSIVE2VWADfFcI.pdf)

Original File Name: Duffy\_LCFS\_2nd\_15-Day\_Comments.pdf

Date and Time Comment Was Submitted: 2024-10-18 10:27:46

No Duplicates.

**Comment 184 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Kaleb

Last Name: Little

Email Address: little@kansassoybeans.org

Affiliation: Kansas Soybean Association

Subject: Second 15-Day Changes Still Don't Address Need for Sound Science on Feedstock  
Issues

Comment:

Please see attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/3-lcfs2024-2nd15day-WzAFcFEPVHQGb1Us.pdf](http://www.arb.ca.gov/lists/com-attach/3-lcfs2024-2nd15day-WzAFcFEPVHQGb1Us.pdf)

Original File Name: KS Soybean Association Comments to CARB 2nd 15 Day Notice - 10-16-  
24.pdf

Date and Time Comment Was Submitted: 2024-10-18 10:29:53

No Duplicates.

**Comment 185 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Helen

Last Name: Kemp

Email Address: hkemp@3degreesinc.com

Affiliation: 3Degrees

Subject: 3Degrees Comments in Response to Proposed Amendments to the Low Carbon Fuel  
Standard Regul

Comment:

Please see attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/4-lcfs2024-2nd15day-BzRdP1A0WW1RJVI3.pdf](http://www.arb.ca.gov/lists/com-attach/4-lcfs2024-2nd15day-BzRdP1A0WW1RJVI3.pdf)

Original File Name: 3Degrees Comments on LCFS Formal Rulemaking - 15 Day (October  
2024) (1).pdf

Date and Time Comment Was Submitted: 2024-10-18 10:32:43

No Duplicates.

**Comment 186 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Amanda

Last Name: Myers

Email Address: amanda@weavegrid.com

Affiliation: WeaveGrid

Subject: Weave Grid, Inc. Supportive Comments in Response to Proposed Second 15-Day

Changes: Propos

Comment:

Please see attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/5-lcfs2024-2nd15day-B3BdPlc3UHVQMwJl.pdf](http://www.arb.ca.gov/lists/com-attach/5-lcfs2024-2nd15day-B3BdPlc3UHVQMwJl.pdf)

Original File Name: WeaveGrid\_Proposed LCFS Amendments V3\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-10-18 10:37:44

No Duplicates.

**Comment 187 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: JT

Last Name: Steenkamp

Email Address: jtsteenkamp@prologis.com

Affiliation: Prologis

Subject: Comments on the Second Proposed 15-Day Changes to the Low Carbon Fuel Standard  
(LCFS) Amen

Comment:

Please see attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/6-lcfs2024-2nd15day-UjFVPABgVWoLZFcj.pdf](http://www.arb.ca.gov/lists/com-attach/6-lcfs2024-2nd15day-UjFVPABgVWoLZFcj.pdf)

Original File Name: Coalition\_Comments.pdf

Date and Time Comment Was Submitted: 2024-10-18 10:39:20

No Duplicates.



**Comment 188 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Steve

Last Name: Compton

Email Address: [steve@sevanabioenergy.com](mailto:steve@sevanabioenergy.com)

Affiliation: Sevana Bioenergy

Subject: Sevana Bioenergy Comments on the Second 15-Day Amendments to the Low Carbon Fuel Standard

Comment:

Please see attached file.

Attachment: [www.arb.ca.gov/lists/com-attach/7-lcfs2024-2nd15day-WilWNVcgADIEbFc2.pdf](http://www.arb.ca.gov/lists/com-attach/7-lcfs2024-2nd15day-WilWNVcgADIEbFc2.pdf)

Original File Name: Sevana CARB\_Comments 10.16.2024.pdf

Date and Time Comment Was Submitted: 2024-10-18 10:43:28

No Duplicates.

**Comment 189 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Paul

Last Name: Hernandez

Email Address: paul.david.hernandez.mpia@gmail.com

Affiliation:

Subject: LCFS

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8-lcfs2024-2nd15day-UTJcNQBsu21WNVI8.pdf](http://www.arb.ca.gov/lists/com-attach/8-lcfs2024-2nd15day-UTJcNQBsu21WNVI8.pdf)

Original File Name: Comments of Paul D. Hernandez to CARB LCFS released 10.16.2024  
PDF.pdf

Date and Time Comment Was Submitted: 2024-10-18 10:46:17

No Duplicates.

**Comment 190 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Paul

Last Name: Rozenberg

Email Address: Non-web submitted comment

Affiliation:

Subject: Suburban Propane - Comments on Second 15-Day Changes to the Proposed LCFS  
Amendments

Comment:

Comment received during 2nd 15-Day comment period.  
Submitted by Clerk on Commenter's behalf.

"Dear Sir/Madam,

On behalf of Suburban Propane, attached are our comments on the  
Second 15-Day Changes on the Proposed Low Carbon Fuel Standard  
Amendments. I am having some technical difficulties in submitting  
the comments online, which is why I am emailing them in. Please let  
me know if you have any questions or need additional information."

Thanks,

Paul

PROzenberg@suburbanpropane.com

Attachment: [www.arb.ca.gov/lists/com-attach/9-lcfs2024-2nd15day-AHNSIQFiBSMFcQFj.pdf](http://www.arb.ca.gov/lists/com-attach/9-lcfs2024-2nd15day-AHNSIQFiBSMFcQFj.pdf)

Original File Name: Suburban Propane - Comments on Additional Modifications to the  
Proposed LCFS Amendments - Paul Rozenberg.pdf

Date and Time Comment Was Submitted: 2024-10-18 10:51:11

No Duplicates.

**Comment 191 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Morgan

Last Name: Caswell

Email Address: Non-web submitted comment

Affiliation:

Subject: San Pedro Bay Ports LCFS Regulation Comment Letter

Comment:

Comment received during 2nd 15-day comment period.  
Submitted by Clerk of the Board on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/12-lcfs2024-2nd15day-BXZUIIAzV3RRCFc7.pdf](http://www.arb.ca.gov/lists/com-attach/12-lcfs2024-2nd15day-BXZUIIAzV3RRCFc7.pdf)

Original File Name: SPBP Letter to CARB - Methanol for Maritime Use in LCFS Program fully  
executed.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:08:17

No Duplicates.

**Comment 192 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Cory-Ann

Last Name: Wind

Email Address: Non-web submitted comment

Affiliation:

Subject: CFAA and CABA comments on the 2nd 15-day notice

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/13-lcfs2024-2nd15day-UDNWNIU1UWNXDIIx.pdf](http://www.arb.ca.gov/lists/com-attach/13-lcfs2024-2nd15day-UDNWNIU1UWNXDIIx.pdf)

Original File Name: CFAA CABA Comments on 2nd 15 Day Package.Final.pdf

Date and Time Comment Was Submitted: 2024-10-18 10:56:51

No Duplicates.

**Comment 193 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Dean

Last Name: Taylor

Email Address: Non-web submitted comment

Affiliation:

Subject: EVCA CalETC Oct 16 letter

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/14-lcfs2024-2nd15day-UzZdLVEzUmAFLgdk.pdf](http://www.arb.ca.gov/lists/com-attach/14-lcfs2024-2nd15day-UzZdLVEzUmAFLgdk.pdf)

Original File Name: EVCA-CalETC comment letter on LCFS proposed 2nd 15-day changes Oct 16 vF.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:42:34

No Duplicates.

**Comment 194 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Sandra

Last Name: Franco

Email Address: Non-web submitted comment

Affiliation:

Subject: 2024 LCFS Second 15-Day Notice of Changes (lcfs 2024 (15-2))

Comment:

Comment received during 2nd 15-Day comment period.

Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/15-lcfs2024-2nd15day-BTcHMVNgUTYAKwEw.pdf](http://www.arb.ca.gov/lists/com-attach/15-lcfs2024-2nd15day-BTcHMVNgUTYAKwEw.pdf)

Original File Name: 2024-10-16 SABR Comments to CARB LCFS.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 195 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Tanya

Last Name: DeRivi

Email Address: Non-web submitted comment

Affiliation:

Subject: WSPA's Second LCFS 15-Day Comments

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/16-lcfs2024-2nd15day-AHdTJl0sVmQFXFUm.pdf](http://www.arb.ca.gov/lists/com-attach/16-lcfs2024-2nd15day-AHdTJl0sVmQFXFUm.pdf)

Original File Name: WSPA Second 15-Day Comments 10-16-2024.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.



## **Comment 196 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Bobbie

Last Name: Cane

Email Address: Non-web submitted comment

Affiliation:

Subject: Comment for Second 15-Day Changes to the LCFS

Comment:

Comment received during 2nd 15-day comment period.  
Submitted by Clerk of the Board on Commenter's behalf.

Dear Clerk of the Board,  
While considering revisions to the LCFS, please take into account the needs of the companies that are currently selling retail hydrogen. The folks who drive FCEVs rely on these companies to refuel and currently, the price of the fuel is so high that we are not driving these cars nearly as much as we could; some people are not driving them at all. Many of our Association members and others have indicated that they have stashed their cars in the garage to wait until the price comes down. That means that instead of taking CO2 out of the atmosphere, we are putting more in, which is contrary to the reason we bought these cars in the first place - to slash carbon emissions and to further the climate goals of California. The companies that sell retail hydrogen are on the forefront of hydrogen car and hydrogen truck adoption. Without them, we would not be talking about full decarbonization in California with any hope that it's actually going to happen before the climate crisis we're in gets significantly worse.

Thank you,  
Bobbie Cane  
California Hydrogen Car Owners Association

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 11:42:03

No Duplicates.

**Comment 197 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Matt

Last Name: Herman

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS 2nd 15 day comment period Comment

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/18-lcfs2024-2nd15day-VD1XIlc3VloLblAx.pdf](http://www.arb.ca.gov/lists/com-attach/18-lcfs2024-2nd15day-VD1XIlc3VloLblAx.pdf)

Original File Name: ISA CARB - 2nd 15 Day Notice Final Comments.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 198 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Melanie

Last Name: Law

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Standard Amendments - Comments in Response to Second  
15-Day Chang

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/19-lcfs2024-2nd15day-V2UBM1FhB2QGMQM2.docx](http://www.arb.ca.gov/lists/com-attach/19-lcfs2024-2nd15day-V2UBM1FhB2QGMQM2.docx)

Original File Name: 241015 NCGA - LCFS Second 15-Day Comments (Final).docx

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 199 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: John

Last Name: Thornton

Email Address: Non-web submitted comment

Affiliation:

Subject: Comment for LCFS 15-2 rulemaking - technical issues

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/20-lcfs2024-2nd15day-VjUCaFM3VmQKYII0.pdf](http://www.arb.ca.gov/lists/com-attach/20-lcfs2024-2nd15day-VjUCaFM3VmQKYII0.pdf)

Original File Name: CleanFuture comment on tech neutrality.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 200 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Matthew

Last Name: Rekeweg

Email Address: Non-web submitted comment

Affiliation:

Subject: comments for Second Notice of Public Availability of Modified Text and Availability  
of Add

Comment:

Comment received during 2nd 15-day comment period.  
Submitted by Clerk of the Board on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/21-lcfs2024-2nd15day-WjlXMFihWGlQCQNv.pdf](http://www.arb.ca.gov/lists/com-attach/21-lcfs2024-2nd15day-WjlXMFihWGlQCQNv.pdf)

Original File Name: CARB LCFS Amendments comments Oct 2024 - Corteva Agriscience.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:49:10

No Duplicates.

## **Comment 201 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Jared

Last Name: Gilmour

Email Address: Non-web submitted comment

Affiliation:

Subject: Comment for LCFS 15-2 rulemaking - technical issues

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Clerk of the Board:

I am writing on behalf of Bunge Limited and Robert Coviello, Chief Sustainability Officer and Government Affairs at Bunge, regarding Mr. Coviello's submission of Bunge comments in response to the California Air Resources Board ("CARB") Second Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information for the Proposed Low Carbon Fuel Standard Amendments (lcfs2024).

Bunge submitted its comments as a PDF attachment today, October 16, 2024, through the CARB online portal. However, an error message appeared upon submission, indicating that the PDF file had failed to upload. Due to these technical issues, Bunge has attached its comments on the second 15-day package of proposed Low Carbon Fuel Standard amendments here.

These comments should appear under the name Robert Coviello (email: robert.coviello@bunge.com) (affiliation: Bunge Limited).

Thank you for your time and attention. Please let us know of any concerns.

Regards,  
Jared Gilmour

Attachment: [www.arb.ca.gov/lists/com-attach/22-lcfs2024-2nd15day-AGIAcwNsV2MGZQIW.pdf](http://www.arb.ca.gov/lists/com-attach/22-lcfs2024-2nd15day-AGIAcwNsV2MGZQIW.pdf)

Original File Name: Bunge Comments Second 15-Day Amendments.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 202 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Alex

Last Name: Banbury

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS 15-Day Changes

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/23-lcfs2024-2nd15day-UyMCdIQ6VmgLeFIh.pdf](http://www.arb.ca.gov/lists/com-attach/23-lcfs2024-2nd15day-UyMCdIQ6VmgLeFIh.pdf)

Original File Name: Promus Energy Comments on the Proposed Low Carbon Fuel Standard Amendments 10.16.24 (3).pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 203 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Hossein

Last Name: Tabatabaie

Email Address: Non-web submitted comment

Affiliation:

Subject: Public comment for the Proposed Low Carbon Fuel Standard Amendments

Comment:

Comment received during 2nd 15-day comment period.  
Submitted by Clerk of the Board on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/24-lcfs2024-2nd15day-UDkBcAdnVXIFYIA+.pdf](http://www.arb.ca.gov/lists/com-attach/24-lcfs2024-2nd15day-UDkBcAdnVXIFYIA+.pdf)

Original File Name: Iwatani Corporation of America-Comment Letter-10.14.24.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:52:09

No Duplicates.



**Comment 204 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Ali

Last Name: Reed

Email Address: Non-web submitted comment

Affiliation:

Subject: General Motors Comments to Second 15-Day Notice on LCFS Amendments

Comment:

Comment received during 2nd 15-Day comment period.

Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/25-lcfs2024-2nd15day-UWNSZAEyVzBWDwk4.pdf](http://www.arb.ca.gov/lists/com-attach/25-lcfs2024-2nd15day-UWNSZAEyVzBWDwk4.pdf)

Original File Name: 2024 10 16\_CARB LCFS Regulatory Updates\_GM FINAL.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 205 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Mary

Last Name: Elizabeth

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Standard Amendments

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/26-lcfs2024-2nd15day-UGEFM1V6UDJVZVJ8.pdf](http://www.arb.ca.gov/lists/com-attach/26-lcfs2024-2nd15day-UGEFM1V6UDJVZVJ8.pdf)

Original File Name: 10.16.2024\_Comments\_MEElizabeth.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 206 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Miles

Last Name: Heller

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS2024 (15-2)

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/27-lcfs2024-2nd15day-BWQCbV0uU19XIVMh.pdf](http://www.arb.ca.gov/lists/com-attach/27-lcfs2024-2nd15day-BWQCbV0uU19XIVMh.pdf)

Original File Name: Air Products Comments October 1st 15-Day Package final (1).pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 207 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Dan

Last Name: Gilstrap

Email Address: Non-web submitted comment

Affiliation:

Subject: Chevron Comments on October 1, 2024 15-Day Package

Comment:

Comment received during 2nd 15-day comment period.  
Submitted by Clerk of the Board on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/28-lcfs2024-2nd15day-AWJQPIYyACUAdAFu.pdf](http://www.arb.ca.gov/lists/com-attach/28-lcfs2024-2nd15day-AWJQPIYyACUAdAFu.pdf)

Original File Name: Chevron Comments on 10-2024 15-Day Package.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:54:33

No Duplicates.

**Comment 208 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Dawn

Last Name: Howe

Email Address: Non-web submitted comment

Affiliation:

Subject: 2024-10-6 CARB 2nd 15 Day Notice

Comment:

Comment received during 2nd 15-day comment period.  
Submitted by Clerk of the Board on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/29-lcfs2024-2nd15day-VGZSZFRnWT4GLQQ1.pdf](http://www.arb.ca.gov/lists/com-attach/29-lcfs2024-2nd15day-VGZSZFRnWT4GLQQ1.pdf)

Original File Name: 2024-10-16 -- CARB 2nd 15 Day Notice - AR Soybean Association.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:56:15

No Duplicates.

**Comment 209 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Danielle

Last Name: Anderson

Email Address: Non-web submitted comment

Affiliation:

Subject: Comment submission: LCFS second 15-day notice, Christianson PLLP

Comment:

Comment received during 2nd 15-day comment period.  
Submitted by Clerk of the Board on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/30-lcfs2024-2nd15day-VzsHYIUyACAGXwNw.pdf](http://www.arb.ca.gov/lists/com-attach/30-lcfs2024-2nd15day-VzsHYIUyACAGXwNw.pdf)

Original File Name: LCFS second 15-day notice, Christianson PLLP comments 10.15.24.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:57:51

No Duplicates.

**Comment 210 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Amanda

Last Name: Cooey

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS comments

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/31-lcfs2024-2nd15day-ADJdb1RkAmEDNFNI.pdf](http://www.arb.ca.gov/lists/com-attach/31-lcfs2024-2nd15day-ADJdb1RkAmEDNFNI.pdf)

Original File Name: 241016 Dairy Cares-Ag Council Comments on Proposed LCFS  
Amendments (2nd 15-Day Changes).pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 211 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Breana

Last Name: Spinler

Email Address: Non-web submitted comment

Affiliation:

Subject: Comments for Proposed Low Carbon Fuel Standard Amendments issued October 1, 2024

Comment:

Comment received during 2nd 15-day comment period.  
Submitted by Clerk of the Board on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/32-lcfs2024-2nd15day-VjMFYFA+BDJSOIM0.pdf](http://www.arb.ca.gov/lists/com-attach/32-lcfs2024-2nd15day-VjMFYFA+BDJSOIM0.pdf)

Original File Name: EcoEngineers Comments - Proposed LCFS Amendments issued October 1, 2024.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:59:47

No Duplicates.



**Comment 212 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Martina

Last Name: Simpkins

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS 2nd 15-Day Notice Comments - Anew Climate  
Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/33-lcfs2024-2nd15day-VTQGblczWX0AWVMw.pdf](http://www.arb.ca.gov/lists/com-attach/33-lcfs2024-2nd15day-VTQGblczWX0AWVMw.pdf)

Original File Name: Anew Comments LCFS 2nd 15-Day Notice.Oct16.2024.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 213 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Declan

Last Name: Maddern

Email Address: Non-web submitted comment

Affiliation:

Subject: Yosemite Clean Energy - LCFS Language Comments 2

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/34-lcfs2024-2nd15day-V2UFM1JhUDdWYAU8.pdf](http://www.arb.ca.gov/lists/com-attach/34-lcfs2024-2nd15day-V2UFM1JhUDdWYAU8.pdf)

Original File Name: 20240923 LCFS Letter for Signatures DM.v3.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 214 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jerry

Last Name: Schmitz

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Standard Amendments Nov 8 hearing

Comment:

Comment received during 2nd 15-day comment period.  
Submitted by Clerk of the Board on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/7990-lcfs2024-AjAFMVQnUW8HLM0d.pdf](http://www.arb.ca.gov/lists/com-attach/7990-lcfs2024-AjAFMVQnUW8HLM0d.pdf)

Original File Name: SD Soybean Association LCFS Comments 10-15-24.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:02:12

No Duplicates.

**Comment 215 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Andrew

Last Name: Craig

Email Address: Non-web submitted comment

Affiliation:

Subject: FW: CalBio Comments on 2nd 15-Day LCFS Amendments

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/37-lcfs2024-2nd15day-WzhXMAFsADEEa1I9.pdf](http://www.arb.ca.gov/lists/com-attach/37-lcfs2024-2nd15day-WzhXMAFsADEEa1I9.pdf)

Original File Name: CalBio 2nd 15-Day Comments.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 216 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Patrick

Last Name: Couch

Email Address: Non-web submitted comment

Affiliation:

Subject: Public comments for 2024 LCFS proposed regulatory changes - Second 15-day Changes  
Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/38-lcfs2024-2nd15day-VjoGY1UyVXVRFCFU2.pdf](http://www.arb.ca.gov/lists/com-attach/38-lcfs2024-2nd15day-VjoGY1UyVXVRFCFU2.pdf)

Original File Name: LCFS Comment Letter to Second 15-day Changes - CA Trucking\_CA  
Transit\_PMSA\_October 16 2024.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 217 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jamie

Last Name: Hall

Email Address: Non-web submitted comment

Affiliation:

Subject: comments on LCFS - 2nd 15 day notice

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/39-lcfs2024-2nd15day-AG0HaVA1WVUDbFA+.pdf](http://www.arb.ca.gov/lists/com-attach/39-lcfs2024-2nd15day-AG0HaVA1WVUDbFA+.pdf)

Original File Name: MHD Infra Parties 2nd 15 Day LCFS Comments Final.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 218 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Greg

Last Name: Reading

Email Address: Non-web submitted comment

Affiliation:

Subject: Re: Error with Submitting LCFS Comment

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/40-lcfs2024-2nd15day-VTBUMwNdUW4KbwVj.pdf](http://www.arb.ca.gov/lists/com-attach/40-lcfs2024-2nd15day-VTBUMwNdUW4KbwVj.pdf)

Original File Name: EA LCFS 10.16.24.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 219 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Greg

Last Name: Staiti

Email Address: Non-web submitted comment

Affiliation:

Subject: Comments of Montana Renewables on 2nd Notice of 15-Days Changes to LCFS  
Amendments (Docket

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/41-lcfs2024-2nd15day-VzpdNAFuBCMAZwZo.pdf](http://www.arb.ca.gov/lists/com-attach/41-lcfs2024-2nd15day-VzpdNAFuBCMAZwZo.pdf)

Original File Name: Montana Renewables LLC\_Public Comments\_10162024.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.



**Comment 220 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Alfredo

Last Name: Arredondo

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS 15 Day Comments from Green Hydrogen Coalition

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/42-lcfs2024-2nd15day-UTZXOVc1V1sHbQFi.pdf](http://www.arb.ca.gov/lists/com-attach/42-lcfs2024-2nd15day-UTZXOVc1V1sHbQFi.pdf)

Original File Name: GHC LCFS Comments Final.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 221 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Ali

Last Name: Fariya

Email Address: Non-web submitted comment

Affiliation:

Subject: Trouble with Submitting LCFS Comment Letter

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/43-lcfs2024-2nd15day-WzdWM106WXkLUgR3.pdf](http://www.arb.ca.gov/lists/com-attach/43-lcfs2024-2nd15day-WzdWM106WXkLUgR3.pdf)

Original File Name: LCFS\_Second 15-day Comments\_PGE\_Final.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 222 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Michael

Last Name: Skvarla

Email Address: Non-web submitted comment

Affiliation:

Subject: RE: CHC and CHBC 2nd 15-day comments to the LCFS rulemaking

Comment:

Comment received during 2nd 15-Day comment period.

Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/44-lcfs2024-2nd15day-Bm5RZVcJAnwKUwRo.pdf](http://www.arb.ca.gov/lists/com-attach/44-lcfs2024-2nd15day-Bm5RZVcJAnwKUwRo.pdf)

Original File Name: H2 - LCFS 2nd 15-day Comments\_Final.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 223 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Kaia

Last Name: Robinson

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS Comment Letter: Support for California Air Resource Board's Low Carbon Fuel  
Standard

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/45-lcfs2024-2nd15day-VDhXML06AiILUgZl.pdf](http://www.arb.ca.gov/lists/com-attach/45-lcfs2024-2nd15day-VDhXML06AiILUgZl.pdf)

Original File Name: LCFS Comment Letter - 2024.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 224 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jonathan

Last Name: Hirte

Email Address: Non-web submitted comment

Affiliation:

Subject: DTE Vantage Comments - Second Notice of Public Availability of Modified Text and  
Availabil

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/46-lcfs2024-2nd15day-BmJQIIYyUV1VJQZn.pdf](http://www.arb.ca.gov/lists/com-attach/46-lcfs2024-2nd15day-BmJQIIYyUV1VJQZn.pdf)

Original File Name: DTE Vantage Comments for LCFS Second 15 Day Modifications  
FINAL.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 225 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Tom

Last Name: Van Heeke

Email Address: Non-web submitted comment

Affiliation:

Subject: Rivian 15-Day Comments: Second Notice of Modifications to the Proposed LCFS  
Amendments

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/47-lcfs2024-2nd15day-AnBQPwB3UGpXMABu.pdf](http://www.arb.ca.gov/lists/com-attach/47-lcfs2024-2nd15day-AnBQPwB3UGpXMABu.pdf)

Original File Name: Rivian\_LCFSAmendments15DayComments\_October\_FINAL.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 226 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Nancy

Last Name: Young

Email Address: Non-web submitted comment

Affiliation:

Subject: Comments on the Second 15-Day Notice of Changes to the Proposed Low Carbon Fuel  
Standard A

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/48-lcfs2024-2nd15day-  
UjVdPIEmWWUGXwNg.pdf](http://www.arb.ca.gov/lists/com-attach/48-lcfs2024-2nd15day-UjVdPIEmWWUGXwNg.pdf)

Original File Name: Gevo Comments - LCFS Second 15-Day Notice-10-15-24.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:33:00

No Duplicates.

**Comment 227 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Matt

Last Name: Miyasato

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS 2nd 15 day comments

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/49-lcfs2024-2nd15day-VTNTMAZhV1tSCwAy.pdf](http://www.arb.ca.gov/lists/com-attach/49-lcfs2024-2nd15day-VTNTMAZhV1tSCwAy.pdf)

Original File Name: FEF 2nd15 day comments r2.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.



**Comment 228 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jonathan

Last Name: Snoeberger

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS2024 Comments

Comment:

Comment received during 2nd 15-Day comment period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/50-lcfs2024-2nd15day-Uj5UMQNkBydRCFMw.pdf](http://www.arb.ca.gov/lists/com-attach/50-lcfs2024-2nd15day-Uj5UMQNkBydRCFMw.pdf)

Original File Name: LCFS\_Comments\_2nd\_15\_day\_LDC.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:43:30

No Duplicates.

**Comment 229 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Roland

Last Name: Walker

Email Address: Non-web submitted comment

Affiliation:

Subject: Rising Fuel Prices – Proposed Changes Will Make Things Worse

Comment:

Comment received during 2nd 15-Day Comment Period.

Comment submitted by Clerk on Commenter's behalf.

"I'm not a Republican, but I agree with this:

<https://src.senate.ca.gov/sites/src.senate.ca.gov/files/10.15.2024%20SREP-AREP%20Letter%20to%20CARB.pdf>

Where's your accountability to the general public? Shame on you."

Attachment: [www.arb.ca.gov/lists/com-attach/51-lcfs2024-2nd15day-VGVSZAEuVTdSYQgm.pdf](http://www.arb.ca.gov/lists/com-attach/51-lcfs2024-2nd15day-VGVSZAEuVTdSYQgm.pdf)

Original File Name: 10.15.2024 SREP-AREP Letter to CARB.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:33:00

No Duplicates.

**Comment 230 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Robert

Last Name: Seddon

Email Address: Non-web submitted comment

Affiliation:

Subject: "Proposed Low Carbon Fuel Amendments" i

Comment:

Comment received during 2nd 15-Day Comment Period.

Comment submitted by Clerk on Commenter's behalf.

"I am requesting a delay in the vote on the "Proposed Low Carbon Fuel Amendments" until updated cost projections are provided to the public."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 11:33:00

No Duplicates.

**Comment 231 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Natalie

Last Name: Jung

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Amendment

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on Commenter's behalf.

"hi,  
Please postpone the vote until you are transparent on what the  
price of gas will be increased by. Isn't fuel high enough? Isn't  
inflation high enough for us to deal with already?  
Thanks"

Attachment: [www.arb.ca.gov/lists/com-attach/53-lcfs2024-2nd15day-AjNVY1F+UDILOAQq.pdf](http://www.arb.ca.gov/lists/com-attach/53-lcfs2024-2nd15day-AjNVY1F+UDILOAQq.pdf)

Original File Name: 10.15.2024SREP-AREPLettertoCARB.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:33:00

No Duplicates.

## **Comment 232 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Richard

Last Name: Zalewski

Email Address: Non-web submitted comment

Affiliation:

Subject: "Proposed Low Carbon Fuel Amendment"

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on Commenter's behalf.

"Dear Chair Randolph,

California motorists are already paying \$1.50 more per gallon for gasoline than the national average price of the other 47 continental states. It is with this in mind that we write you again with serious concerns about the proposed amendments to the Low-Carbon Fuels Standard (LCFS) program that will drive up fuel prices. We regret that the California Air Resources Board (CARB) refuses to release any analysis of how its proposed LCFS amendments will affect gas prices in California.

Sincerely, from a 75yo who would like to afford to stay in California.

"

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 11:33:00

No Duplicates.

**Comment 233 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Larry

Last Name: Workman

Email Address: Non-web submitted comment

Affiliation:

Subject: "Proposed Low Carbon Fuel Amendment"

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on Commenter's behalf.

"DON'T RAISE THE TAX ON GASOLINE!

Californians are currently paying \$1.50 more per gallon for gasoline than the national average. Now, new amendments proposed by the California Air Resources Board (CARB) under the Low-Carbon Fuels Standard (LCFS) program could make this even worse, driving prices up by as much as \$0.85 per gallon soon and up to \$1.50 per gallon by 2035."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 11:33:00

No Duplicates.

**Comment 234 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Dan

Last Name: Bowerson

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS2024 Comments Failed to Attach

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/56-lcfs2024-2nd15day-BmdcL1YjUW0GXwdu.pdf](http://www.arb.ca.gov/lists/com-attach/56-lcfs2024-2nd15day-BmdcL1YjUW0GXwdu.pdf)

Original File Name: Auto Innovators\_CARB LCFS 2nd 15-Day Notice (10-16-2024) - Dan Bowerson.pdf

Date and Time Comment Was Submitted: 2024-10-18 11:33:00

No Duplicates.

## **Comment 235 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: JH2F

Last Name: Japan Hydrogen Forum

Email Address: Non-web submitted comment

Affiliation:

Subject: Submittal] Japan Hydrogen Forum (JH2F) \_Comments on Proposed Low Carbon Fuel Standard 15-d

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

Ms. Rajinder Sahota,  
To whom it may concern

Japan Hydrogen Forum (JH2F) is pleased to submit the attached comments for consideration. JH2F is an organization formed in 2021 to contribute to the goal of decarbonization in the United States, consisting of 32 Japan-affiliated companies with hydrogen related technologies from production, carrier conversion, transportation, storage to utilization, including hydrogen fuel cell providers for heavy-duty (HD) truck and cargo handling equipment OEMs and retail hydrogen refueling station (HRS) providers in California. We would like to express our sincere gratitude for your staff's work on the development of the proposed rule and their commitment to improving the LCFS to achieve carbon neutrality by 2045 and reduce greenhouse gas emissions 85% below 1990 levels by 2045.

Please allow us to submit the Public Comments via email since we had technical difficulty to process the electronic submittal. Should you have any questions, please feel free to contact us at LAG@jetro.go.jp

Sincerely,  
Japan Hydrogen Forum (JH2F)  
(213)354-2438

Attachment: [www.arb.ca.gov/lists/com-attach/57-lcfs2024-2nd15day-AmgFa1RnV2IKU1Mj.pdf](http://www.arb.ca.gov/lists/com-attach/57-lcfs2024-2nd15day-AmgFa1RnV2IKU1Mj.pdf)

Original File Name: JH2F Proposed Low Carbon Fuel Standard Amendments\_Octq16th - Japan Hydrogen Forum.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.



**Comment 236 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Sara

Last Name: Herman

Email Address: Non-web submitted comment

Affiliation:

Subject: CARB LCFS docket - comments for 2nd 15-day package

Comment:

Comment received during 2nd 15-Day Comment Period.

Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/58-lcfs2024-2nd15day-VzQAZwd0VmIAbwill.pdf](http://www.arb.ca.gov/lists/com-attach/58-lcfs2024-2nd15day-VzQAZwd0VmIAbwill.pdf)

Original File Name: Cargill LCFS Comments 2nd 15-day - Sara Herman.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 237 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jane

Last Name: O'Malley

Email Address: Non-web submitted comment

Affiliation:

Subject: ICCT comments on Second Notice of Public Availability of Modified Text and  
Availability of

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/59-lcfs2024-2nd15day-  
AmtUMQFjUHdRCAhr.pdf](http://www.arb.ca.gov/lists/com-attach/59-lcfs2024-2nd15day-AmtUMQFjUHdRCAhr.pdf)

Original File Name: ICCT comments on 2nd 15-day LCFS package - Jane OMalley.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

## **Comment 238 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Robert

Last Name: Cleeland

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Amendment

Comment:

Comment received during 2nd 15-Day Comment Period.

Comment submitted by Clerk on behalf of Commenter.

"I'm writing to request that your upcoming vote regarding Low Carbon Fuel Amendments be delayed, or shelved entirely. There needs to be a full public review and disclosure of the updated pricing impact, resulting from this regulation. Californians already pay the highest fuel costs in the country, with taxes & regulations driving the cost up substantially. The cost of fuel impacts everything we consume, in addition to the cost of our own transportation needs. There is only so much the consumer can bear, and actions like this proposed amendment directly adds to the everyday cost of every household and individual in the state. These actions only tend to add to the out of state migration of financially able residents, as well as those who can simply no longer afford the California financial burden."

Thank you - Robert Cleeland

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 239 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Lori

Last Name: Luebbe

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS 2nd 15-Day Changes docket comments

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/61-lcfs2024-2nd15day-UT8BYlwCBydQOVUs.pdf](http://www.arb.ca.gov/lists/com-attach/61-lcfs2024-2nd15day-UT8BYlwCBydQOVUs.pdf)

Original File Name: NE Soy Assoc. LCFS comments 10 16 24 - Lori Luebbe.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 240 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Ben

Last Name: Travlos

Email Address: Non-web submitted comment

Affiliation:

Subject: MO Soybean Association Comments-LCFS Second 15-Day Changes

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

"Good afternoon,

Please see the attached comments on behalf of the Missouri Soybean Association President, Renee Fordyce. This is in reference to the proposed Low Carbon Fuel Standard Second 15-Day Changes.

Please let us know if there are any questions."

Attachment: [www.arb.ca.gov/lists/com-attach/62-lcfs2024-2nd15day-WzYCd1U1Aw9SNwNs.pdf](http://www.arb.ca.gov/lists/com-attach/62-lcfs2024-2nd15day-WzYCd1U1Aw9SNwNs.pdf)

Original File Name: MSA Comments to California Air Resources Board 10-16-24 - Ben Travlos.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 241 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Chris

Last Name: Vervaet

Email Address: Non-web submitted comment

Affiliation:

Subject: Second Notice of Public Availability of Modified Text and Availability of Additional  
Docum

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

"On behalf of the Canadian canola industry, please find attached  
our submission to CARB's Second 15-Day Changes to the proposed LCFS  
amendments."

Attachment: [www.arb.ca.gov/lists/com-attach/63-lcfs2024-2nd15day-  
VjVRNgRrVmRQMLc+.pdf](http://www.arb.ca.gov/lists/com-attach/63-lcfs2024-2nd15day-VjVRNgRrVmRQMLc+.pdf)

Original File Name: Canadian canola industry submission\_ CA LCFS\_2nd 15 day package\_Oct  
16 2024\_Final - Chris Vervaet.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 242 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Brian

Last Name: Pellens

Email Address: Non-web submitted comment

Affiliation:

Subject: CTV Comments on the October 1, 2024 CARB Low Carbon Fuel Standard 15-Day  
Changes

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/64-lcfs2024-2nd15day-UTIBcwZxBAgHYgJt.pdf](http://www.arb.ca.gov/lists/com-attach/64-lcfs2024-2nd15day-UTIBcwZxBAgHYgJt.pdf)

Original File Name: CTV Comments on 2nd 15-day LCFS package 10162024 - Brian  
Pellens.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

1 Duplicates.

**Comment 243 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Alexa

Last Name: Combelic

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS Second 15-Day Changes - American Soybean Association Comments

Comment:

Comment received during 2nd 15-Day Comment Period.

Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/65-lcfs2024-2nd15day-BzVda1xvUTYKIQk4.pdf](http://www.arb.ca.gov/lists/com-attach/65-lcfs2024-2nd15day-BzVda1xvUTYKIQk4.pdf)

Original File Name: 2024-10-16 -- 2nd 15 Day Notice - ASA Comments - Alexa Combelic.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.



**Comment 244 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Dallas

Last Name: Gerber

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS Oct 1st 15-Day Package

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/66-lcfs2024-2nd15day-UGICNAAzWD8HL1Bh.pdf](http://www.arb.ca.gov/lists/com-attach/66-lcfs2024-2nd15day-UGICNAAzWD8HL1Bh.pdf)

Original File Name: 2024.10.16 - LCFS Proposed Amendments Comments - Dallas Gerber.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

## **Comment 245 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Kirk

Last Name: Olsen

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Amendments

Comment:

Comment received during 2nd 15-Day Comment Period.

Comment submitted by Clerk on behalf of Commenter.

"New amendments proposed by the California Air Resources Board (CARB) under the Low-Carbon Fuels Standard (LCFS) program could drive fuel prices up by as much as \$0.85 per gallon soon and by up to \$1.50 per gallon by 2035. Please delay all votes on this topic until clear information regarding the costs of these amendments has been provided to the voters of California. Our fuel prices are already the highest in the Continental United States, and we cannot afford for them to go any higher, especially with potential price shocks on the horizon due to instability in Russia, Iran, and other unfriendly fuel producing nations.

Thank you, "

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

## **Comment 246 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Randy

Last Name: Michetti

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Amendments

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

"Further to the concerns raised by my representative Greg Wallis and his colleagues in his letter to The Honorable Liane Randolph Chair, California Air Resources Board dated October 15, 2024, when can the voting public expect to see updated cost projections for the proposed amendments to the Low-Carbon Fuels Standard (LCFS) program? Full disclosure of long-term financial impacts and the need for greater public participation is required before changes as significant as these are voted upon and enacted.

Please DO NOT proceed with the planned LCFS hearing until representative Wallis and other representatives have had an opportunity to better understand the cost implications of the proposed changes. The last thing California needs is more costs for the people of this state! The high cost of living in California is already causing sizeable numbers of people to leave the state. That should be a big red flag for Chairman Randolph and other regulators that are considering policy changes that only serve to drive costs higher with limited benefit."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

## **Comment 247 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Herman

Last Name: Galicia

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Amendments

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

"I am requesting the CARB delay the vote until updated cost projections are provided to the public. Actually, I think this particular rule making should be presented to the citizens as a Proposition ballot measure; as any tax, bond issue, etc. would be.

I am a liberal Californian, and voting straight Democrat in this coming election purely to preserve the U.S. Constitution. It isn't always that way.

Our gas prices are already obscene, compared to a lot of other states. Further increases in that differential could result in unintended political and social consequences. The public hasn't been made aware of the changes that will further increase our costs, much like a tax. I think more time should be given for science to develop some alternatives, as further modifications are probably producing smaller improvements at increasingly greater costs.

The supermajority in the legislature is walking a fine line, along with many of our state boards and committees. I believe we are reaching the limits of traditional liberalism, as governmental revenue vs. spending or personal income vs. expenses are reaching a point of financial destabilization."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 248 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Anita

Last Name: Fields

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Amendments

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

"CARB Members,

Please delay the vote on the above-referenced proposed amendments  
until updated cost projections are provided to the public.

Thank you."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

## **Comment 249 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Bethany

Last Name: Ballard

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Amendments

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

"I'm a resident of California.  
I read about the proposed amendments by CARB.  
Please delay the upcoming vote until updated cost projections are provided to the Public.

Californians are currently paying \$1.50 more per gallon for gasoline than the national average. Now, new amendments proposed by the California Air Resources Board (CARB) under the Low-Carbon Fuels Standard (LCFS) program could make this even worse, driving prices up by as much as \$0.85 per gallon soon and up to \$1.50 per gallon by 2035.

Stop this from happening.

CARB has not been transparent about the real impact these changes will have on fuel costs.  
This is a continuation of UN Sustainability Goals which aims to further bring the economy of our State, and nation, down instead of raising third world nations up. The result in our State will be more homeless and poverty stricken people who will have no private transportation for work. Please keep our population from more poverty.

I am urging that you delay your vote and provide clear information before moving forward with policies that could make living in California more unaffordable."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 250 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Doug

Last Name: Padgett

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Amendments

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

"To: California Air Resources Board (CARB)

I understand you are proposing amendments to the Low-Carbon Fuels Standard (LCFS) program. I urgently request you delay the vote until updated cost projections are provided to the public. The carbon emitted by the ships bringing foreign oil to our state FAR EXCEEDS the carbon emitted by all our vehicles in this state combined, yet you are forcing our oil wells and refineries IN THIS STATE to restrict their utilization and capacity. This process is costing me dearly at the gas pump. Now you want to make it worse with your amendments, without due consideration to the impact on me and all of us as citizens.

Reconsider your policies at every level and bring back robust IN-STATE oil production."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 251 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Leigh

Last Name: Raley

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Amendments

Comment:

Comment received during 2nd 15-Day Comment Period.

Comment submitted by Clerk on behalf of Commenter.

"I am writing to request, delaying the vote on "Proposed Low Carbon Fuel Amendments". Raising taxes on gasoline raises the cost of all essential commodities. CARB needs to provide updated cost projections to the public."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.



## **Comment 252 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Greg

Last Name: Varra

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Amendments

Comment:

Comment received during 2nd 15-Day Comment Period.

Comment submitted by Clerk on behalf of Commenter.

"To whom it may concern:

California's gas prices are already \$1.50 higher than the rest of the nation. Consumers are strapped with the high cost of living and taxes in our state. Not to mention, the federal burden being imposed on us through inflation, high interest rates, and astronomical and spiraling out of control national debt of \$35 Trillion growing by the minute.

PLEASE DELAY THE VOTE UNTIL COST PROJECTIONS ARE PROVIDED TO THE PUBLIC. We need full transparency here and without cost projections we have no idea what we're being strapped with.

Salutations."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 253 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Josh

Last Name: Wilson

Email Address: Non-web submitted comment

Affiliation:

Subject: OET Comments on October 1, 2024 Second Revised Proposed Amendments to LCFS  
Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/76-lcfs2024-2nd15day-UGFcaldnWD1SZgQ0.pdf](http://www.arb.ca.gov/lists/com-attach/76-lcfs2024-2nd15day-UGFcaldnWD1SZgQ0.pdf)

Original File Name: 10162024\_POET Comments on Second Revised Proposed Amendments to  
LCFS - Josh Wilson.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 254 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Neil

Last Name: Koehler

Email Address: Non-web submitted comment

Affiliation:

Subject: RFA comments to 2nd 15 Day Comment Package - Proposed Amendments to LCFS  
Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/77-lcfs2024-2nd15day-UiBWNgdnV1sFYAlm.pdf](http://www.arb.ca.gov/lists/com-attach/77-lcfs2024-2nd15day-UiBWNgdnV1sFYAlm.pdf)

Original File Name: RFA Comments on CARB LCFS 2nd 15-day Comment Proposal-10-16-24  
- Neil Koehler.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 255 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Becky

Last Name: Kinder

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS Second 15-Day Changes

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/78-lcfs2024-2nd15day-AmlSMVM8BSJRlIAz.pdf](http://www.arb.ca.gov/lists/com-attach/78-lcfs2024-2nd15day-AmlSMVM8BSJRlIAz.pdf)

Original File Name: Kentucky Soybean Association LCFS Comments 8 27 24 - Becky Kinder.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 256 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Caelin

Last Name: MacIntosh

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS2024 Second 15-Day Changes Comments - American Biogas Council  
Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/79-lcfs2024-2nd15day-WmhUZIVIVDcLPFBm.pdf](http://www.arb.ca.gov/lists/com-attach/79-lcfs2024-2nd15day-WmhUZIVIVDcLPFBm.pdf)

Original File Name: 241016 ABC Comments\_CARB LCFS Second 15 Day Changes - Caelin MacIntosh.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 257 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Thereza

Last Name: Cevidanes

Email Address: Non-web submitted comment

Affiliation: Comments: Second Notice of Public Availa

Subject: LCFS2024 Second 15-Day Changes Comments - American Biogas Council

Comment:

Comment received during 2nd 15-Day Comment Period.

Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/80-lcfs2024-2nd15day-UjxVMlciACALYIQL.pdf](http://www.arb.ca.gov/lists/com-attach/80-lcfs2024-2nd15day-UjxVMlciACALYIQL.pdf)

Original File Name: NATSO SIGMA Comments on LCFS Proposed Changes\_Second Notice -  
Thereza Cevidanes.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 258 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Kailee

Last Name: Tkacz Buller

Email Address: Non-web submitted comment

Affiliation:

Subject: Submission RE: Second Notice of Public Availability of Modified Text and  
Availability of A

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/81-lcfs2024-2nd15day-  
WzUCawd2VGZVDAIq.pdf](http://www.arb.ca.gov/lists/com-attach/81-lcfs2024-2nd15day-WzUCawd2VGZVDAIq.pdf)

Original File Name: NOPA Comments 2nd 15 Day FINAL 10.16.24 - Kailee Buller.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 259 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jake

Last Name: Hamlin

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Low Carbon Fuel Standard Amendments (Second 15-Day Notice)

Comment:

Comment received during 2nd 15-Day Comment Period.

Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/82-lcfs2024-2nd15day-VjVSPAByVVkLf1Uw.pdf](http://www.arb.ca.gov/lists/com-attach/82-lcfs2024-2nd15day-VjVSPAByVVkLf1Uw.pdf)

Original File Name: CHS response\_CARB 2nd 15-day LCFS changes\_final - Jake Hamlin.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.



**Comment 260 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Mark

Last Name: Stoermann

Email Address: Non-web submitted comment

Affiliation:

Subject: Fwd: Newtrient Comments on the Second 15-Day Changes to the Low Carbon Fuel  
Standard - lcf

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/83-lcfs2024-2nd15day-UGJTYVZnB2wANAM0.pdf](http://www.arb.ca.gov/lists/com-attach/83-lcfs2024-2nd15day-UGJTYVZnB2wANAM0.pdf)

Original File Name: 240827-Newtrient-LCFS-Second-15-Day-Comments - Mark  
Stoermann.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 261 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Aaron

Last Name: Lavee

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS Comment

Comment:

Comment received during 2nd 15-Day Comment Period.  
Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/85-lcfs2024-2nd15day-VThdOgNrBDkKfwBw.pdf](http://www.arb.ca.gov/lists/com-attach/85-lcfs2024-2nd15day-VThdOgNrBDkKfwBw.pdf)

Original File Name: Mainspring Letter of Support - Aaron Lavee.pdf

Date and Time Comment Was Submitted: 2024-10-18 12:34:40

No Duplicates.

**Comment 262 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Will

Last Name: Collier

Email Address: Non-web submitted comment

Affiliation:

Subject: Bunge Comments on Second 15-day LCFS Package

Comment:

Please see attached file.

Submitted on behalf of commenter by COTB.

Attachment: [www.arb.ca.gov/lists/com-attach/11-fundingplan2024-UzEHdFc4ADQCYVMM.pdf](http://www.arb.ca.gov/lists/com-attach/11-fundingplan2024-UzEHdFc4ADQCYVMM.pdf)

Original File Name: Bunge Comments Second 15-Day Amendments (1).pdf

Date and Time Comment Was Submitted: 2024-10-18 16:00:07

No Duplicates.

**Comment 263 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Bob

Last Name: Hambrecht

Email Address: Non-web submitted comment

Affiliation:

Subject: Comment Letter Submission

Comment:

Comment received during 2nd 15-Day comment period.

Comment submitted by Clerk on Commenter's behalf.

Attachment: [www.arb.ca.gov/lists/com-attach/40-onmc24-UDNWMVYIV2YHXgNv.pdf](http://www.arb.ca.gov/lists/com-attach/40-onmc24-UDNWMVYIV2YHXgNv.pdf)

Original File Name: CARB LCFS Rulemaking Comment Letter no3 October 2024 - Bob Hambrecht.pdf

Date and Time Comment Was Submitted: 2024-10-18 16:21:11

No Duplicates.

**Comment 264 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Dean

Last Name: Taylor

Email Address: Non-web submitted comment

Affiliation:

Subject: CalETC Oct 16 letter

Comment:

Comment received during 2nd 15-Day comment period.

Comment submitted by Clerk on behalf of Commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/41-onmc24-AmFTNFwxBDJRIwBj.pdf](http://www.arb.ca.gov/lists/com-attach/41-onmc24-AmFTNFwxBDJRIwBj.pdf)

Original File Name: CalETC Comment Letter w Attachment on LCFS proposed 2nd 15-day changes Oct 16 vF - Dean Taylor.pdf

Date and Time Comment Was Submitted: 2024-10-21 12:45:52

No Duplicates.

**Comment 265 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Emily

Last Name: Lemei

Email Address: emily.lemei@ncpa.com

Affiliation:

Subject: NCPA Comments on Second 15-Day Changes to the LCFS

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8044-lcfs2024-AmwGY1cmBTcAWVAz.pdf](http://www.arb.ca.gov/lists/com-attach/8044-lcfs2024-AmwGY1cmBTcAWVAz.pdf)

Original File Name: NCPA Comments on Second 15-Day LCFS Changes (1).pdf

Date and Time Comment Was Submitted: 2024-10-24 09:34:05

No Duplicates.

**Comment 266 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Ryan

Last Name: Kenny

Email Address: ryan.kenny@cleanenergyfuels.com

Affiliation:

Subject: LCFS: Clean Energy Comments on Second 15-Day Package

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8045-lcfs2024-B2QHbQZpAzUCW1I+.pdf](http://www.arb.ca.gov/lists/com-attach/8045-lcfs2024-B2QHbQZpAzUCW1I+.pdf)

Original File Name: CLNE LCFS 2nd 15 Day Comment Letter October 2024.pdf

Date and Time Comment Was Submitted: 2024-10-24 10:19:01

No Duplicates.

**Comment 267 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Tony

Last Name: Brunello

Email Address: tbrunello@calstrat.com

Affiliation:

Subject: U.S. Energy Comments on Second 15-Day Rulemaking

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8047-lcfs2024-AHVReQFzAn8AWVQi.pdf](http://www.arb.ca.gov/lists/com-attach/8047-lcfs2024-AHVReQFzAn8AWVQi.pdf)

Original File Name: U.S. Venture Comments on LCFS 10.15.24 (1).pdf

Date and Time Comment Was Submitted: 2024-10-24 10:19:01

No Duplicates.



**Comment 268 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Steve

Last Name: Howell

Email Address: showell@indianasoybean.com

Affiliation:

Subject: CARB 2nd 15 Day Notice Comments from Indiana Soybean

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8048-lcfs2024-U2EGMFJhVTJQewg5.pdf](http://www.arb.ca.gov/lists/com-attach/8048-lcfs2024-U2EGMFJhVTJQewg5.pdf)

Original File Name: 2024-10-16 -- CARB 2nd 15 Day Notice - 10-16-24 - FINAL (1).pdf

Date and Time Comment Was Submitted: 2024-10-24 10:19:01

No Duplicates.

**Comment 269 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Sam

Last Name: Wade

Email Address: sam@rngcoalition.com

Affiliation:

Subject: Coalition for Renewable Natural Gas Comments on Second 15 LCFS Package  
Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8049-lcfs2024-ADJRY1JiUjFVYgM1.pdf](http://www.arb.ca.gov/lists/com-attach/8049-lcfs2024-ADJRY1JiUjFVYgM1.pdf)

Original File Name: 241016 RNGC Second 15 Day Comments.pdf

Date and Time Comment Was Submitted: 2024-10-24 10:19:01

No Duplicates.

**Comment 270 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Alexis

Last Name: Moch

Email Address: amoch@prologis.com

Affiliation:

Subject: Coalition comments on LCFS 2nd 15-Day changes

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8050-lcfs2024-AGNcNQdnBDsAb1Mn.pdf](http://www.arb.ca.gov/lists/com-attach/8050-lcfs2024-AGNcNQdnBDsAb1Mn.pdf)

Original File Name: Coalition LCFS Comments 2nd 15-Day Changes (1).pdf

Date and Time Comment Was Submitted: 2024-10-24 10:19:01

No Duplicates.

**Comment 271 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Benjamin

Last Name: Kling

Email Address: bkling@betalabservices.com

Affiliation:

Subject: CA LCFS 2024 Update 2nd 15-Day Comment Beta Analytic

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8051-lcfs2024-AmEAZwdZUW4CZwRi.pdf](http://www.arb.ca.gov/lists/com-attach/8051-lcfs2024-AmEAZwdZUW4CZwRi.pdf)

Original File Name: CA LCFS 15 Day Proposed Update Pt 2 Comment Beta Analytic.pdf

Date and Time Comment Was Submitted: 2024-10-24 10:19:01

No Duplicates.

**Comment 272 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Matt

Last Name: Bright

Email Address: mbright@carboncapture.com

Affiliation:

Subject: DAC companies' comments RE LCFS amendments

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8052-lcfs2024-UT1VMARjWXLWDwBh.zip](http://www.arb.ca.gov/lists/com-attach/8052-lcfs2024-UT1VMARjWXLWDwBh.zip)

Original File Name: LCFS Amendments DAC comments.zip

Date and Time Comment Was Submitted: 2024-10-24 12:06:42

No Duplicates.

**Comment 273 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Sarah  
Last Name: Taheri  
Email Address: staheri@sdge.com  
Affiliation:

Subject: SDG&E Comments on the Second 15-Day Proposed LCFS Amendments  
Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8053-lcfs2024-UiFRMwZgBzEGX1c0.pdf](http://www.arb.ca.gov/lists/com-attach/8053-lcfs2024-UiFRMwZgBzEGX1c0.pdf)

Original File Name: SDGE Comments on LCFS 15-Day\_101624.pdf

Date and Time Comment Was Submitted: 2024-10-24 12:06:42

No Duplicates.

**Comment 274 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Steve

Last Name: Bond

Email Address: steve.bond@crimsonrenewable.com

Affiliation:

Subject: LCFS Rulemaking Comment

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8054-lcfs2024-VDdRJVU9UG5WIwRr.pdf](http://www.arb.ca.gov/lists/com-attach/8054-lcfs2024-VDdRJVU9UG5WIwRr.pdf)

Original File Name: Crimson Renewable Energy Comment - CARB Board Meeting 101424A.pdf

Date and Time Comment Was Submitted: 2024-10-24 12:06:42

No Duplicates.

**Comment 275 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: William

Last Name: Barrett

Email Address: [william.barrett@lung.org](mailto:william.barrett@lung.org)

Affiliation:

Subject: Health group letter on LCFS proposal

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8055-lcfs2024-VztTNIQzAiIGXwFp.pdf](http://www.arb.ca.gov/lists/com-attach/8055-lcfs2024-VztTNIQzAiIGXwFp.pdf)

Original File Name: LCFS Health Orgs 10.16.24.pdf

Date and Time Comment Was Submitted: 2024-10-24 12:06:42

No Duplicates.



**Comment 276 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Nicole

Last Name: Looney

Email Address: nicole.looney@smud.org

Affiliation:

Subject: SMUD's Comments on the Proposed 15-Day Changes

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8056-lcfs2024-U2FSZFRnUDcKIgk4.pdf](http://www.arb.ca.gov/lists/com-attach/8056-lcfs2024-U2FSZFRnUDcKIgk4.pdf)

Original File Name: 2024.10.16\_SMUD Comments - 2nd 15-Day Changes - LEG 2024-0133.pdf

Date and Time Comment Was Submitted: 2024-10-24 12:06:42

No Duplicates.

**Comment 277 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Sean

Last Name: Newsum

Email Address: [snewsum@airlines.org](mailto:snewsum@airlines.org)

Affiliation:

Subject: Airlines for America Comments on Proposed LCFS Program Amendments posted  
October 1,

Comment:

Comment was received on October 16, 2024, via electronic submittal  
as directed on the public notice. However, due to a technical  
issue  
with the attached files, the comment is being posted on October 24  
following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8057-lcfs2024-UjNWZF09AAxQnQhn.pdf](http://www.arb.ca.gov/lists/com-attach/8057-lcfs2024-UjNWZF09AAxQnQhn.pdf)

Original File Name: A4A Comments on Proposed LCFS Amendments 101624 - Final.pdf

Date and Time Comment Was Submitted: 2024-10-24 12:06:42

No Duplicates.

**Comment 278 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Cristin

Last Name: Reno

Email Address: cristin.reno@oberonfuels.com

Affiliation:

Subject: Oberon Fuels Comments on CARB LCFS Proposed Amendments October 16 2024  
Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8058-lcfs2024-UzwBZQFIACEFbAdp.pdf](http://www.arb.ca.gov/lists/com-attach/8058-lcfs2024-UzwBZQFIACEFbAdp.pdf)

Original File Name: Oberon Fuels Comments on CARB LCFS Proposed Amendments October 16 2024 (1).pdf

Date and Time Comment Was Submitted: 2024-10-24 13:16:59

No Duplicates.

**Comment 279 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Jessilyn-Elise

Last Name: Davis

Email Address: jdavis6@socalgas.com

Affiliation:

Subject: SoCalGas Comment Letter on CARB LCFS 15 Day Changes

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8059-lcfs2024-BXZWP1c1UGIKYFA3.pdf](http://www.arb.ca.gov/lists/com-attach/8059-lcfs2024-BXZWP1c1UGIKYFA3.pdf)

Original File Name: SoCalGas Comment Letter on CARB LCFS 15 Day Changes.pdf

Date and Time Comment Was Submitted: 2024-10-24 13:16:59

No Duplicates.

**Comment 280 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Sarah

Last Name: Somorai

Email Address: ssomorai@hmausa.com

Affiliation:

Subject: Hyundai's Comments to CARB's LCFS 2nd 15-day Changes

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8060-lcfs2024-Vj4BflcjV2oLaQdm.pdf](http://www.arb.ca.gov/lists/com-attach/8060-lcfs2024-Vj4BflcjV2oLaQdm.pdf)

Original File Name: Hyundai - CARB LCFS 2nd 15 Day Comments (10162024).pdf

Date and Time Comment Was Submitted: 2024-10-24 13:16:59

No Duplicates.

**Comment 281 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Daniel

Last Name: Chandler

Email Address: dwchndl@suddenlink.net

Affiliation:

Subject: 2nd 15 day amendments to LCFS regulations

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8062-lcfs2024-Am4AZQRjV3cEXVIh.pdf](http://www.arb.ca.gov/lists/com-attach/8062-lcfs2024-Am4AZQRjV3cEXVIh.pdf)

Original File Name: LCFS second 15 day changes\_10\_16.pdf

Date and Time Comment Was Submitted: 2024-10-24 13:16:59

No Duplicates.

**Comment 282 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Shannon

Last Name: Broome

Email Address: sbroome@hunton.com

Affiliation:

Subject: Comments of Highly Innovative Fuels USA

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8063-lcfs2024-WmhQZgMwA2QGLVRI.pdf](http://www.arb.ca.gov/lists/com-attach/8063-lcfs2024-WmhQZgMwA2QGLVRI.pdf)

Original File Name: 2024-10-16 - HIF USA Comments on CARB October 2024 Second 15 Day Notice.pdf

Date and Time Comment Was Submitted: 2024-10-24 13:16:59

No Duplicates.

**Comment 283 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Shannon

Last Name: Broome

Email Address: sbroome@huntonak.com

Affiliation:

Subject: Low-CI Methanol for Marine Fuel

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8064-lcfs2024-BjRSZFJhVTJWfVJj.pdf](http://www.arb.ca.gov/lists/com-attach/8064-lcfs2024-BjRSZFJhVTJWfVJj.pdf)

Original File Name: 2024-10-16 Low CI Methanol Coalition Letter to CARB.pdf

Date and Time Comment Was Submitted: 2024-10-24 13:16:59

No Duplicates.



**Comment 284 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Steven

Last Name: Berry

Email Address: steven.berry@yale.edu

Affiliation:

Subject: Comments on Second 15 Day Rule

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8066-lcfs2024-BWYBaAFtU21VNIQ6.pdf](http://www.arb.ca.gov/lists/com-attach/8066-lcfs2024-BWYBaAFtU21VNIQ6.pdf)

Original File Name: COMMENTS OF STEVE BERRY AND TIM SEARCHINGER ON SECOND 15-DAY RULE (1).pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.

**Comment 285 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Ben

Last Name: Steyer

Email Address: bsteyer@michigansoybean.org

Affiliation:

Subject: CARB LCFS Amendments

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8067-lcfs2024-VmRdawQ3VDMEL1Vk.pdf](http://www.arb.ca.gov/lists/com-attach/8067-lcfs2024-VmRdawQ3VDMEL1Vk.pdf)

Original File Name: 2024-10-16 -- CARB 2nd 15 Day Notice - Michigan Soybean Association.pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.

**Comment 286 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Joe

Last Name: Jobe

Email Address: joe@rockhouse.us

Affiliation:

Subject: Comments of SABR Coalition on Second 15-Day Changes LCFS 2024 Amendments  
Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8068-lcfs2024-ADJTZVBjBGMCKQEw.pdf](http://www.arb.ca.gov/lists/com-attach/8068-lcfs2024-ADJTZVBjBGMCKQEw.pdf)

Original File Name: 2024-10-16 SABR Comments to CARB LCFS.pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.

**Comment 287 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Colin

Last Name: Murphy

Email Address: cwmurphy@ucdavis.edu

Affiliation:

Subject: Comments on 2nd 15 day LCFS amendment package

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8069-lcfs2024-B3JcOQNdVmFSNVch.pdf](http://www.arb.ca.gov/lists/com-attach/8069-lcfs2024-B3JcOQNdVmFSNVch.pdf)

Original File Name: UC Davis Comments on 2nd 15 Day Package of LCFS Amendments (1).pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.

**Comment 288 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Becca

Last Name: Teigen

Email Address: becca.teigen@srectrade.com

Affiliation:

Subject: SRECTrade LCFS Comments 10/16/2024

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8070-lcfs2024-VSYHcwdjVGRXJVAi.pdf](http://www.arb.ca.gov/lists/com-attach/8070-lcfs2024-VSYHcwdjVGRXJVAi.pdf)

Original File Name: SRECTrade LCFS Comments\_10.16.24.pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.

**Comment 289 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Sara

Last Name: Olsen

Email Address: [solsen@edf.org](mailto:solsen@edf.org)

Affiliation:

Subject: Environmental Defense Fund LCFS Comments

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8071-lcfs2024-Uj5SN1QzWXkLUgNw.pdf](http://www.arb.ca.gov/lists/com-attach/8071-lcfs2024-Uj5SN1QzWXkLUgNw.pdf)

Original File Name: LCFS Second 15-Day Package EDF Compiled Comments 2024.pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.

**Comment 290 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Chad

Last Name: Frahm

Email Address: chad.frahm@brightmark.com

Affiliation:

Subject: Brightmark comments to CARB LCFS amendments (2nd 15-day notice)

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8072-lcfs2024-VTdXI1M7VWFXOQJ2.pdf](http://www.arb.ca.gov/lists/com-attach/8072-lcfs2024-VTdXI1M7VWFXOQJ2.pdf)

Original File Name: Brightmark comments.CARB LCFS rulemaking.Oct 16 2024.pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.

**Comment 291 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Steve

Last Name: Fenaroli

Email Address: sfenaroli@cbbf.com

Affiliation:

Subject: California Farm Bureau's Comments Relating to the Proposed Low Carbon Fuel  
Standard

Comment:

Comment was received on October 16, 2024, via electronic submittal  
as directed on the public notice. However, due to a technical  
issue  
with the attached files, the comment is being posted on October 24  
following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8073-lcfs2024-WjYGYwBnV3cLUgAx.pdf](http://www.arb.ca.gov/lists/com-attach/8073-lcfs2024-WjYGYwBnV3cLUgAx.pdf)

Original File Name: LCFS\_10162024\_CAFBcomments\_10162024.pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.



**Comment 292 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Gracyna

Last Name: Mohabir

Email Address: gracyna@envirovoters.org

Affiliation:

Subject: EnviroVoters Comments on Second 15-Day Changes

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8075-lcfs2024-VDECal0qUWsLf1c4.pdf](http://www.arb.ca.gov/lists/com-attach/8075-lcfs2024-VDECal0qUWsLf1c4.pdf)

Original File Name: EnviroVoters LCFS 2nd 15-Day Changes Comments 10-16-24.pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.

**Comment 293 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Nancy

Last Name: Johnson

Email Address: Nancy.johnson@ndsga.com

Affiliation:

Subject: Second 15-Day Changes to the Proposed Regulation Order

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8077-lcfs2024-BjRdawMwVTJRelJj.pdf](http://www.arb.ca.gov/lists/com-attach/8077-lcfs2024-BjRdawMwVTJRelJj.pdf)

Original File Name: 2024-10-16 -- CARB 2nd 15 Day Notice - North Dakota.pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.

**Comment 294 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Julia

Last Name: Levin

Email Address: jlevin@bioenergyca.org

Affiliation:

Subject: Two corrections needed to LCFS regulations

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8078-lcfs2024-WjhXMFQ2AAwEYVU6.pdf](http://www.arb.ca.gov/lists/com-attach/8078-lcfs2024-WjhXMFQ2AAwEYVU6.pdf)

Original File Name: BAC Comments on 2nd 15-day language for LCFS (1).pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.

**Comment 295 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Steve

Last Name: Burns

Email Address: sburns@actumllc.com

Affiliation:

Subject: Comments for CA LCFS 2nd 15-Day Proposed Changes

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8079-lcfs2024-BmVUM1YIWWYHYgRi.pdf](http://www.arb.ca.gov/lists/com-attach/8079-lcfs2024-BmVUM1YIWWYHYgRi.pdf)

Original File Name: CA LCFS Second 15-day Package AcelenR comments.pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.

**Comment 296 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Melinda

Last Name: Palmer

Email Address: mpalmer@kernenergy.com

Affiliation:

Subject: LCFS Comments 2nd 15-day Package

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8080-lcfs2024-AGtdPlckWWRXDgJu.pdf](http://www.arb.ca.gov/lists/com-attach/8080-lcfs2024-AGtdPlckWWRXDgJu.pdf)

Original File Name: Kern LCFS Comments October 2024.pdf

Date and Time Comment Was Submitted: 2024-10-24 14:29:25

No Duplicates.

**Comment 297 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Michael

Last Name: Harrison

Email Address: Michael.Harrison@valero.com

Affiliation:

Subject: Valero Renewable Fuels Company, LLC Comments on Second 15-Day LCFS  
Amendments Packag

Comment:

Comment was received on October 16, 2024, via electronic submittal  
as directed on the public notice. However, due to a technical  
issue  
with the attached files, the comment is being posted on October 24  
following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/8082-lcfs2024-UyVRNgRpBzEGclc4.pdf](http://www.arb.ca.gov/lists/com-attach/8082-lcfs2024-UyVRNgRpBzEGclc4.pdf)

Original File Name: Valero Renewable Fuels Company Comments on Second 15-Day LCFS  
Amendments Package10.15.2024 (1).pdf

Date and Time Comment Was Submitted: 2024-10-24 15:52:10

No Duplicates.

**Comment 298 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Fred

Last Name: Ghatala

Email Address: fghatala@advancedbiofuels.ca

Affiliation:

Subject: Comments from Advanced Biofuels Canada (Association)

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/86-lcfs2024-2nd15day-AWBVMVA3V2cEXQdk.pdf](http://www.arb.ca.gov/lists/com-attach/86-lcfs2024-2nd15day-AWBVMVA3V2cEXQdk.pdf)

Original File Name: ABFC\_CARB\_LCFS\_15\_day\_comments\_October\_16\_2024\_1 (1).pdf

Date and Time Comment Was Submitted: 2024-10-27 16:04:15

No Duplicates.

**Comment 299 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Ravi

Last Name: Sekhon

Email Address: Non-web submitted comment

Affiliation:

Subject: Comments on LCFS Amendments

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/87-lcfs2024-2nd15day-U2EFM11uBGMKIVVk.pdf](http://www.arb.ca.gov/lists/com-attach/87-lcfs2024-2nd15day-U2EFM11uBGMKIVVk.pdf)

Original File Name: 2024-10-16 Centerline Logistics Sahota Chang Botill Letter re MeOH Resolution Language.pdf

Date and Time Comment Was Submitted: 2024-10-27 16:18:12

No Duplicates.



**Comment 300 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Oscar

Last Name: Garcia

Email Address: Non-web submitted comment

Affiliation:

Subject: Neste Comments on October 1, 2024 15-day LCFS Package

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/88-lcfs2024-2nd15day-AmwAY1wuBSIHZFUK.pdf](http://www.arb.ca.gov/lists/com-attach/88-lcfs2024-2nd15day-AmwAY1wuBSIHZFUK.pdf)

Original File Name: Neste\_October 1 LCFS 15-day Package Comments\_October 16 2024.pdf

Date and Time Comment Was Submitted: 2024-10-27 16:18:12

No Duplicates.

**Comment 301 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Tyler

Last Name: Lobdell

Email Address: Non-web submitted comment

Affiliation:

Subject: Comments on second 15-day changes

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/89-lcfs2024-2nd15day-UmABN1BjUTYGLgQ1.pdf](http://www.arb.ca.gov/lists/com-attach/89-lcfs2024-2nd15day-UmABN1BjUTYGLgQ1.pdf)

Original File Name: 2024.10.16\_2nd 15day changes cmts\_final.pdf

Date and Time Comment Was Submitted: 2024-10-27 16:18:12

No Duplicates.

**Comment 302 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Amy

Last Name: Malaki

Email Address: Non-web submitted comment

Affiliation:

Subject: SkyNRG comments on LCFS proposed modifications (Second 15-Day C  
Comment:

Comment was received on October 16, 2024, via electronic submittal  
as directed on the public notice. However, due to a technical  
issue  
with the attached files, the comment is being posted on October 24  
following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/90-lcfs2024-2nd15day-  
BTdTZQAzWD8DKAQ1.pdf](http://www.arb.ca.gov/lists/com-attach/90-lcfs2024-2nd15day-BTdTZQAzWD8DKAQ1.pdf)

Original File Name: 2024-10-16 SkyNRG Comments - Proposed Second 15-Day Changes  
LCFS\_final.pdf

Date and Time Comment Was Submitted: 2024-10-27 16:18:12

No Duplicates.

**Comment 303 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Katie

Last Name: Saliccioli

Email Address: Non-web submitted comment

Affiliation:

Subject: Ford Comments on Proposed Low Carbon Fuel Standard Amendments

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/91-lcfs2024-2nd15day-VzEFbANwV2AHXgRo.pdf](http://www.arb.ca.gov/lists/com-attach/91-lcfs2024-2nd15day-VzEFbANwV2AHXgRo.pdf)

Original File Name: Ford LCFS Comments 16Oct2024.pdf

Date and Time Comment Was Submitted: 2024-10-27 16:36:41

No Duplicates.

**Comment 304 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Krysta

Last Name: Wanner

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS 2nd 15-Day Language

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/92-lcfs2024-2nd15day-VWRVY1d4A2EENAc.pdf](http://www.arb.ca.gov/lists/com-attach/92-lcfs2024-2nd15day-VWRVY1d4A2EENAc.pdf)

Original File Name: 10.16.24 LCFS Letter Final.pdf

Date and Time Comment Was Submitted: 2024-10-29 09:19:35

No Duplicates.

**Comment 305 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Zach

Last Name: Woogen

Email Address: Non-web submitted comment

Affiliation:

Subject: Vehicle-Grid Integration Council (VGIC) Second 15-Day Comments

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/93-lcfs2024-2nd15day-ADJTZQc0UzRVfINi.pdf](http://www.arb.ca.gov/lists/com-attach/93-lcfs2024-2nd15day-ADJTZQc0UzRVfINi.pdf)

Original File Name: 2024-10-16 VGIC Second LCFS 15-Day Comments.pdf

Date and Time Comment Was Submitted: 2024-10-29 09:19:35

No Duplicates.

## **Comment 306 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-2.**

First Name: Bob  
Last Name: Hart  
Email Address: bobh05444@gmail.com  
Affiliation:

Subject: Gas Price Increase  
Comment:

California motorists are already paying \$1.50 more per gallon for gasoline than the national average price of the other 47 continental states. It is with this in mind that we write you again with serious concerns about the proposed amendments to the Low-Carbon Fuels Standard (LCFS) program that will drive up fuel prices.

We regret that the California Air Resources Board (CARB) refuses to release any analysis of how its proposed LCFS amendments will affect gas prices in California. As Los Angeles Times columnist George Skelton wrote over the weekend:

"A year ago the air board (CARB) estimated that the new regulation could raise gas prices by 47 cents a gallon because of refinery costs passed on the consumers. A separate study placed the pump cost much higher - 65 cents a gallon. Now the air board has backed off its 47-cent price hike estimate. And it refuses to offer a revised forecast . . . So an unelected bunch of regulators can arbitrarily adopt new rules without weighing the costs to consumers? Doesn't seem right. Seems a bit irresponsible and arrogant."

We concur with Skelton's assessment that CARB is being irresponsible at the expense of everyday Californians struggling with the affordability of basic needs. You need to Stop This Attack On CA. Citizens. You Already Steal To much Money From us And Waste it!

Sincerely, Bob

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2024-10-19 07:41:47

No Duplicates.

**Comment 307 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-2.**

First Name: Maria

Last Name: Pica

Email Address: Non-web submitted comment

Affiliation:

Subject: CA LCFS Comments

Comment:

Comment was received on October 16, 2024, via electronic submittal as directed on the public notice. However, due to a technical issue with the attached files, the comment is being posted on October 24 following resolution of server issues.

Attachment: [www.arb.ca.gov/lists/com-attach/94-lcfs2024-2nd15day-WjtUNIU5BAgKb1Ax.pdf](http://www.arb.ca.gov/lists/com-attach/94-lcfs2024-2nd15day-WjtUNIU5BAgKb1Ax.pdf)

Original File Name: ADM CA LCFS Comments - Oct 16 2024.pdf

Date and Time Comment Was Submitted: 2024-11-05 14:07:01

No Duplicates.



## **Comment 1 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-3.**

First Name: Al

Last Name: Pimentel

Email Address: the4pimentels@comcast.net

Affiliation:

Subject: Request for an EO for aftermarket exhaust on 20+ year old car

Comment:

**\*\*Subject:\*\*** Request for Assistance in Obtaining CARB Executive Order for Aftermarket Part for 2004-2005 Mazdaspeed MX-5 Miata  
Governor Gavin Newsom  
1021 O Street, Suite 9000  
Sacramento, CA 95814

Dear Governor Newsome,

I am writing as a constituent who voted for you and as someone seeking your assistance in obtaining a California Air Resources Board (CARB) Executive Order (EO) for an aftermarket part designed specifically for the 2004-2005 Mazdaspeed MX-5 Miata. As you may know, CARB requires an EO to certify that add-on or modified parts do not increase vehicle emissions.

However, the process to obtain this exemption presents unique challenges for vehicles with low production numbers--fewer than 6,000 units of this model were sold in North America and they are all 20+ years old now.

The part in question is a downpipe and catalytic converter, SKU# 06-58300, produced by Flyin' Miata, a highly respected manufacturer and retailer of quality aftermarket components. The catalytic converter meets California emissions standards and will pass the sniffer test. Flyin' Miata is well known for their commitment to engineering excellence and emissions compliance, yet the complexity, cost, and delays of the CARB approval process make it extremely difficult for them to justify pursuing certification for niche vehicles like the Mazdaspeed MX-5.

While I fully support California's efforts to reduce vehicle emissions, the current EO process is unnecessarily burdensome for small manufacturers and enthusiasts trying to bring compliant parts to market. The extensive testing requirements, high costs, and bureaucratic roadblocks discourage compliance and push people toward off-the-books modifications or simply abandoning efforts altogether. This kind of government inefficiency is exactly why voters become frustrated with the system, leading to electoral outcomes like Donald Trump's victories. People want practical governance, not red tape that makes life harder for those

who are trying to follow the rules.

I respectfully request your help in addressing these issues:

1. **\*\*Advocacy for Streamlined Processes:\*\*** Encourage CARB to develop alternative approval pathways for low-production vehicles, such as reduced testing requirements or lower fees.
2. **\*\*Support for Small Manufacturers:\*\*** Promote initiatives that provide financial or technical assistance for small businesses seeking EO certification.
3. **\*\*Policy Development:\*\*** Support legislative or regulatory reforms that account for the challenges of certifying parts for low-production vehicles without compromising environmental goals.

I appreciate your time and your service to our community. Your leadership is crucial in ensuring that California's regulatory framework remains fair, practical, and accessible to businesses and consumers alike. Please let me know how I can assist in advancing this discussion.

Sincerely,

Alex Pimentel

2005 Mazdaspeed Miata Owner  
3739 Painted Pony Road  
Richmond CA 94803  
the4pimentels@comcast.net  
510-813-0479

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2025-04-08 21:12:01

1 Duplicates.

**Comment 2 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-3.**

First Name: Cheri

Last Name: Keisner

Email Address: c144p@outlook.com

Affiliation:

Subject: The Breath of Life

Comment:

Growing up in the 1960's in Los Angeles, there were several days were we not allowed outside on the playground due to "smog alerts."

I had bronchial asthma with my mother making a tent above my bed with Vick's in a vaporizer and rubbed on my chest so I would not wheeze. Now I live in Northern California near the coast in the Redwood rain forest. Here the air is pure, rather than brown with sulfuric odors. No amount money extracted from polluting the earth can buy a healthy life. Only living in a healthy environment will bring that to a reality.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2025-04-08 21:19:53

No Duplicates.

## **Comment 3 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-3.**

First Name: Alec

Last Name: Orozco

Email Address: AlecJOrozco@Gmail.com

Affiliation:

Subject: Raising Costs on California Tradesmen

Comment:

I'm a young tradesman, a cell tower climber, relying on my gas truck to chase work across California. The LCFS keeps jacking up fuel costs while barely denting carbon emissions, and these amendments make it worse for folks like me. I urge CARB to rethink this.

The Section 95482(h) change lets hydrogen with carbon capture dodge the 2035 fossil phaseout and count as 80% renewable by 2030. More hydrogen credits mean higher deficits for gas/diesel when there is already \$0.47/gallon extra on gas (\$4.80 CA vs. \$4.00 U.S., AAA April 2025). Section 95483(c) dumps all base credits to utilities and EV rewards, even motorcycles, cutting gas/diesel relief. Sections 95486.3/95486.4 juice hydrogen station credits--bigger derates, no caps--pushing ZEV buildout while I pay more to fill up.

This hits hard for me at roughly \$500/year extra for 25k miles, assuming 12 MPG, when 85% of us drive gas/diesel (15M vehicles, DMV 2024). LCFS costs soared 47% since 2017 (CARB Dashboard), but transportation emissions dropped just 7% (174MMT to 162MMT, CARB 2023). That's \$17B for peanuts; 37MMT reduced since 2007 (CARB) isn't worth it when credits favor EVs (70%, 2024 data) and leave gas/diesel footing 70% of deficits on 30% of supply.

I work out-of-town jobs with high physical risk for my money. Why should I subsidize hydrogen stations or EV rebates when emissions barely budge? These changes deepen the squeeze without proof they work. Pull back--focus credits on gas/diesel relief, not ZEV handouts. Let workers breathe, not just green tech.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2025-04-10 16:35:17

No Duplicates.

## **Comment 4 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-3.**

First Name: Tara

Last Name: Lopez

Email Address: taralopez858@gmail.com

Affiliation:

Subject: Adding Onto the Exurbanite Costs on Students in California

Comment:

I'm a college student in California, juggling tuition, rent, and gas for my beat-up sedan--already stretched thin by this state's insane cost of living. The LCFS keeps driving up fuel prices, and these amendments pile on more pain for students like me, with little proof it's cutting carbon enough to matter. Please reconsider this burden.

Section 95482(h) lets hydrogen with carbon capture count as 80% renewable by 2030 and skips the 2035 fossil phaseout. More hydrogen credits mean higher gas prices--already \$0.47/gallon extra (CARB 2024 Dashboard), pushing California's \$4.80/gallon (AAA April 2025) way past the \$4.00 U.S. average. Section 95483(c) shifts all base credits to utilities and EV rewards, even motorcycles--nothing for gas users like me. Sections 95486.3 and 95486.4 boost hydrogen station credits with bigger derates and no caps, favoring ZEVs while I pay more to commute to class.

Gas is 15% of my \$20k/year budget--\$300 extra yearly when driving roughly 10k miles a year. Rent's \$1,400/month, tuition's \$7k (CSU 2024)--I'm drowning, and 85% of us drive gas/diesel (15M vehicles, DMV 2024). LCFS costs jumped 47% since 2017 (CARB), but emissions only fell 7% (174MMT to 162MMT, CARB 2023)--\$17B for 37MMT since 2007 isn't worth it when EVs hog 70% of credits (2024 data) and gas covers 70% of deficits.

I'm studying, working part-time--not slacking. Why should I fund hydrogen or EV rebates when carbon emissions barely budges? These changes squeeze students harder. Shift credits to ease gas costs for those of us who are already doing the most we can.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2025-04-10 16:42:34

No Duplicates.

## **Comment 5 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-3.**

First Name: Angela

Last Name: Kurdyla

Email Address: aekurdyla@dons.usfca.edu

Affiliation: Citizen of San Francisco

Subject: Statement on Third Notice of Public Availability of Modified Text and Availability of  
Addi

Comment:

Dear Clerk of the Board,

My name is Angela Kurdyla, I live in San Francisco, and I am an undergraduate student of Environmental Studies at the University of San Francisco.

It is my belief that the changes made in the "Third Notice of Public Availability of Modified Text and Availability of Additional Documents and Information" are not sufficient to implement the "Proposed Low Carbon Fuel Standard Amendments." Changes made in the "Third Notice..." do not sufficiently respond to the concerns of the nonprofit groups, Food and Water Watch, Communities for a Better Environment, and Growth Energy regarding carbon credit given for the production of renewable hydrogen from the burning of biomethane.

Renewable hydrocarbons are a necessary clean energy source for long term energy storage as we shift away from burning fossil fuels. However, the Board does not account for the implication crediting renewable hydrogen production will have on large agricultural animal feeding operations. Though I acknowledge the positive incentive this amendment has to move away from fossil fuel reliance, incentivizing fuel production in animal agricultural operations will only increase the size of these GHG hotspots. In 2022, the agricultural sector accounted for 8% of state GHG emissions with 70% of these GHG emissions deriving from livestock, primarily dairy farms (California Air Resources Board, 2024). It is my fear that encouraging biomethane production will increase agricultural GHG emissions as agriculture operations see incentive in expanding their operations. Methane digesters are now common among large dairy farms as it is only large livestock feeding operations that can produce a sufficient amount of manure to benefit off renewable hydrogen production. Herd sizes of dairy facilities grew roughly 3.7% in a year, moving against Biden's Global Methane Pledge committing to a 20% reduction in herd sizes (Skiff, 2024). While the nation should be transitioning away from its dependence on livestock feeding operations, California is moving backwards.

"The Proposed Low Carbon Fuel Standard Amendments" if adopted, will result in a nonuniform transition to better air quality. I urge the California Air Resources Board to vote against the "Proposed Low Carbon Fuel Standard Amendments." The state of California should

not jeopardize the air quality of our future for a fleeting economic benefit to the livestock industry.

References:

California Air Resources Board. (2024, September 20). California greenhouse gas emissions from 2000 to 2022.  
[https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000\\_2022\\_ghg\\_inventory\\_trends.pdf](https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf)

Skiff, S. (2024, February 21). New research reveals factory farm manure biogas production harms environmental justice, fails to achieve methane reduction targets, and worsens consolidation. Friends of the Earth.  
<https://foe.org/news/factory-farm-manure-biogas-report/>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2025-04-10 21:19:11

No Duplicates.

**Comment 6 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-3.**

First Name: Tom  
Last Name: Van Heeke  
Email Address: tvanheeke@rivian.com  
Affiliation: Rivian Automotive

Subject: 15-Day Comments on Third Notice of Modified Text for the LCFS Amendments  
Comment:

Rivian is pleased to submit the attached 15-day comments in response to the third notice of modified text for the LCFS amendments.

We are grateful for CARB's dedication to this rulemaking and look forward to implementation of the amendments.

-Tom Van Heeke  
641-888-0035  
tvanheeke@rivian.com

Attachment: [www.arb.ca.gov/lists/com-attach/8206-lcfs2024-BnRTPAF2VW9QNwln.pdf](http://www.arb.ca.gov/lists/com-attach/8206-lcfs2024-BnRTPAF2VW9QNwln.pdf)

Original File Name: Rivian\_LCFS15DayThirdMods\_CommentLetter\_FINAL (3).pdf

Date and Time Comment Was Submitted: 2025-04-14 11:34:43

No Duplicates.



**Comment 7 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024)  
- 15-3.**

First Name: Ryan  
Last Name: Kenny  
Email Address: ryan.kenny@cleanenergyfuels.com  
Affiliation: Clean Energy

Subject: Clean Energy Comment Letter: 3rd 15-day Package  
Comment:

Thank you for considering Clean Energy's comments concerning the  
Third 15-day Package for the Low Carbon Fuel Standard update.

Attachment: [www.arb.ca.gov/lists/com-attach/8207-lcfs2024-VzRRO1wzBzEKUwJu.pdf](http://www.arb.ca.gov/lists/com-attach/8207-lcfs2024-VzRRO1wzBzEKUwJu.pdf)

Original File Name: CLNE LCFS 3rd 15 Day Comments April 2025.pdf

Date and Time Comment Was Submitted: 2025-04-14 15:37:25

No Duplicates.

## **Comment 8 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-3.**

First Name: Carolann

Last Name: Maccini

Email Address: cbucca651@gmail.com

Affiliation:

Subject: Demanding Reform of the 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: 2025-04-16 05:48:20

No Duplicates.

## **Comment 9 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-3.**

First Name: Chloe  
Last Name: Taylor  
Email Address: chloemmtaylor@gmail.com  
Affiliation: Resident

Subject: Public Comment on Third 15-Day Modifications to Proposed LCFS Amendments  
Comment:

Dear California Air Resources Board

As a college student living in San Francisco and someone deeply concerned about the future of our climate and frontline communities, I appreciate the opportunity to submit my public comment regarding the Third Notice of Modified Text for the Low Carbon Fuel Standard (LCFS) Amendments.

While I support California's efforts to reduce carbon intensity in the transportation sector, I urge CARB to prioritize true zero-emission solutions over transitional or unproven technologies like hydrogen produced with carbon capture and sequestration (CCS). Allowing fossil-based hydrogen with CCS to count toward renewable hydrogen requirements risks prolonging dependence on fossil fuel infrastructure, which harms air quality.

I respectfully ask that CARB make all regulatory documents and amendments accessible in plain language to support public understanding and meaningful participation. The complexity of the tracked changes and APA formatting poses a barrier for students, working people, and non-technical community members trying to stay informed and advocate for equitable policy.

Please ensure this amendment process upholds climate justice, centers public health, and avoids greenwashing technologies that benefit fossil fuel companies more than frontline Californians.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2025-04-16 09:49:28

No Duplicates.

**Comment 10 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Asher

Last Name: Goldman

Email Address: asher@generatecapital.com

Affiliation: Generate Capital

Subject: Generate Capital Comments on Amendments to LCFS

Comment:

Please see the enclosed letter from Generate Capital on the Third  
15 Day Changes

Attachment: [www.arb.ca.gov/lists/com-attach/8210-lcfs2024-UDcFZgdoU2VWIIU0.pdf](http://www.arb.ca.gov/lists/com-attach/8210-lcfs2024-UDcFZgdoU2VWIIU0.pdf)

Original File Name: Generate Capital Comments on LCFS\_2025.04.16.pdf

Date and Time Comment Was Submitted: 2025-04-16 10:08:09

No Duplicates.

**Comment 11 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Ryan  
Last Name: Huggins  
Email Address: rhuggins@srectrade.com  
Affiliation: SRECTrade, Inc.

Subject: Comments on EV Charger verification for Third 15 Day Package  
Comment:

Please see our attached comments

Attachment: [www.arb.ca.gov/lists/com-attach/8211-lcfs2024-B3QAdFQwVWVVJ1Ig.pdf](http://www.arb.ca.gov/lists/com-attach/8211-lcfs2024-B3QAdFQwVWVVJ1Ig.pdf)

Original File Name: SRECTrade LCFS Comments\_April 2025.pdf

Date and Time Comment Was Submitted: 2025-04-16 10:41:19

No Duplicates.

**Comment 12 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Dan

Last Name: Evans

Email Address: Dan@promusenergy.com

Affiliation: Promus Energy

Subject: Comments on Proposed Low Carbon Fuel Standard Third 15-Day Changes

Comment:

Please see comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8212-lcfs2024-AHBVIVU7VGpQI1Aj.pdf](http://www.arb.ca.gov/lists/com-attach/8212-lcfs2024-AHBVIVU7VGpQI1Aj.pdf)

Original File Name: Promus Energy Comments on the Proposed Low Carbon Fuel Standard Amendments 4.16.25.pdf

Date and Time Comment Was Submitted: 2025-04-16 13:07:15

No Duplicates.

**Comment 13 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Hossein

Last Name: Tabatabaie

Email Address: htabatabaie@iwatani.com

Affiliation: Iwatani Corporation of America

Subject: Proposed changes to LCFS

Comment:

Please see attached our comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/8213-lcfs2024-BWxSI1ExU3RRNII8.pdf](http://www.arb.ca.gov/lists/com-attach/8213-lcfs2024-BWxSI1ExU3RRNII8.pdf)

Original File Name: Iwatani Corporation of America-Comment Letter-4.17.25.pdf

Date and Time Comment Was Submitted: 2025-04-17 09:46:50

No Duplicates.



**Comment 14 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Kent

Last Name: Grotelueschen

Email Address: kentgrote@gmail.com

Affiliation: Nebraska Soybean Association

Subject: LCFS comments 4-21-25

Comment:

See attached comments from NE Soybean Association on LCFS Proposal

Attachment: [www.arb.ca.gov/lists/com-attach/8214-lcfs2024-AW9UNwBeAiICawF4.pdf](http://www.arb.ca.gov/lists/com-attach/8214-lcfs2024-AW9UNwBeAiICawF4.pdf)

Original File Name: NE Soy Assoc. LCFS Comments 4 21 25.pdf

Date and Time Comment Was Submitted: 2025-04-17 12:41:17

No Duplicates.

**Comment 15 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Thereza  
Last Name: Cevidanes  
Email Address: tcevidanes@natso.com  
Affiliation: NATSO, SIGMA

Subject: NATSO, SIGMA Comments on Proposed LCFS Amendments 4.18.25  
Comment:

Please see attached for NATSO and SIGMA's comments on the third notice.

Attachment: [www.arb.ca.gov/lists/com-attach/8215-lcfs2024-AG4FYgdyBCQKY1QL.pdf](http://www.arb.ca.gov/lists/com-attach/8215-lcfs2024-AG4FYgdyBCQKY1QL.pdf)

Original File Name: NATSO SIGMA Comments on LCFS Proposed Changes\_Third Notice.pdf

Date and Time Comment Was Submitted: 2025-04-18 05:40:37

No Duplicates.

**Comment 16 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Laura

Last Name: Renger

Email Address: laura@caletc.com

Affiliation: CalETC

Subject: CalETC's Comments Supporting LCFS

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8216-lcfs2024-UDMCZVc6BTNVJ1c0.pdf](http://www.arb.ca.gov/lists/com-attach/8216-lcfs2024-UDMCZVc6BTNVJ1c0.pdf)

Original File Name: CalETC comment letter on April 2025 15 day changes.pdf

Date and Time Comment Was Submitted: 2025-04-18 11:30:07

1 Duplicates.

**Comment 17 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Matt

Last Name: Miyasato

Email Address: matt.miyasato@firstelementfuel.com

Affiliation: FirstElement Fuel

Subject: FirstElement Fuel comments on 3rd 15-day changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8217-lcfs2024-B2EFZlw7VlpVDAc0.pdf](http://www.arb.ca.gov/lists/com-attach/8217-lcfs2024-B2EFZlw7VlpVDAc0.pdf)

Original File Name: FEF 3rd 15 day comments.pdf

Date and Time Comment Was Submitted: 2025-04-18 11:51:25

No Duplicates.

**Comment 18 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Graham

Last Name: Noyes

Email Address: graham@noyeslawcorp.com

Affiliation: Noyes Law Corporation for Raizen

Subject: Raizen Supports CARB's Proposed Third 15-Day Changes to LCFS

Comment:

Dear Executive Officer Cliff,

The attached comment letter is submitted on behalf of my client Raízen Energia S.A. ("Raízen"). Raízen appreciates the opportunity to provide comments on the Proposed 15-Day Changes to the Low Carbon Fuel Standard (LCFS) Regulation.

We recognize and commend the efforts made by CARB to enhance the clarity and precision of the regulatory language in response to the Office of Administrative Law's (OAL) direction. The updated language contained in the 15-Day Changes addresses the ambiguity concerns raised by OAL, contributing to improved regulatory transparency and compliance.

In particular, we welcome the explicit recognition and incorporation of more regionalized tools, such as MapBiomass, in the Land Use Change (LUC) section. This is a valuable step forward in capturing land use dynamics with greater granularity and local accuracy.

Raizen's full comment is attached.

Best Regards,  
Graham Noyes

Attachment: [www.arb.ca.gov/lists/com-attach/8219-lcfs2024-AnAGYVE5UntQMwVr.pdf](http://www.arb.ca.gov/lists/com-attach/8219-lcfs2024-AnAGYVE5UntQMwVr.pdf)

Original File Name: RAIZEN 3D 15D LCFS LTR To CARB 18 APR 2025.pdf

Date and Time Comment Was Submitted: 2025-04-18 14:43:59

No Duplicates.

## **Comment 19 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-3.**

First Name: Annalyn

Last Name: Sanders

Email Address: annalynsanders@yahoo.com

Affiliation: Clean Truck Testing Location

Subject: Clean Truck Test Location Training

Comment:

Hello,

We are doing the testing for the clean truck checks so our customers are compliant and can get registration. There have been more issues arising with the OVI testing and submission. Our mutual customers are calling us because YOU show them non compliant when they go to the DMV, when they are compliant. All we can do on our end is resubmit the forms.

Can you consider offering training not only for the admin side of this, but also for what to say to our customers who are upset with us when we try to explain we are not CARB affiliated per say we are just a testing location? We do not know any reasoning behind it.

ALSO, we do not own trucks, so we can only get so far on the website to see what it looks like. But we get a LOT of elder people with motor homes that are NOT tech savy, can we get a training course on how to help them as well?

Is there compensation or reimbursement for the amount of time we spend on your website or trying to help customers with issues that fall on your end?

Is there compensation for our customers who have not been registered since February because the DMV won't except the forms directly it has to come to you even though it has been sent to you?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2025-04-18 17:11:11

No Duplicates.

**Comment 20 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Laura  
Last Name: Renger  
Email Address: laura@caletc.com  
Affiliation: CalETC

Subject: Joint Utility 15 day Comment letter  
Comment:

Comment submitted by Clerk on behalf of commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/8222-lcfs2024-UzlcNVA4BDIRI1Mm.pdf](http://www.arb.ca.gov/lists/com-attach/8222-lcfs2024-UzlcNVA4BDIRI1Mm.pdf)

Original File Name: JointUtility15 dayCommentLetter041212025.pdf

Date and Time Comment Was Submitted: 2025-04-18 19:09:17

No Duplicates.

**Comment 21 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: California Fuels and  
Last Name: Convenience Alliance  
Email Address: [alessandra@cfca.energy](mailto:alessandra@cfca.energy)  
Affiliation:

Subject: Proposed LCFS Amendments  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8223-lcfs2024-UDNTM1w+UGIGX1V4.pdf](http://www.arb.ca.gov/lists/com-attach/8223-lcfs2024-UDNTM1w+UGIGX1V4.pdf)

Original File Name: CFCA - CARB Proposed LCFS Amendments .pdf

Date and Time Comment Was Submitted: 2025-04-20 03:10:23

No Duplicates.



**Comment 22 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Sarah  
Last Name: Somorai  
Email Address: ssomorai@hmausa.com  
Affiliation: Hyundai

Subject: LCFS 3rd 15-Day Changes Comments  
Comment:

Thank you for the opportunity to comment on the LCFS 3rd 15-day changes. Please see Hyundai's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8225-lcfs2024-WzMHeARwV2oKaAdm.pdf](http://www.arb.ca.gov/lists/com-attach/8225-lcfs2024-WzMHeARwV2oKaAdm.pdf)

Original File Name: Hyundai - CARB LCFS 3rd 15 Day Comments (04212025).pdf

Date and Time Comment Was Submitted: 2025-04-21 00:22:53

No Duplicates.

**Comment 23 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Sam

Last Name: Wade

Email Address: sam@rngcoalition.com

Affiliation:

Subject: RNG Coalition Comments on LCFS Third 15-Day

Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/8226-lcfs2024-WylcNABmV1sKbwdo.pdf](http://www.arb.ca.gov/lists/com-attach/8226-lcfs2024-WylcNABmV1sKbwdo.pdf)

Original File Name: RNG Coalition Comments on LCFS Third 15-Day.pdf

Date and Time Comment Was Submitted: 2025-04-21 07:04:46

No Duplicates.

**Comment 24 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Matt

Last Name: Herman

Email Address: mherman@iasoybeans.com

Affiliation: Iowa Soybean Association

Subject: Comments

Comment:

Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/8227-lcfs2024-Bm9dKFMzA30GYwNi.pdf](http://www.arb.ca.gov/lists/com-attach/8227-lcfs2024-Bm9dKFMzA30GYwNi.pdf)

Original File Name: ISA-CARB Comments April 2025\_BS Signed.pdf

Date and Time Comment Was Submitted: 2025-04-21 07:54:59

No Duplicates.

**Comment 25 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Heather

Last Name: Dziedzic

Email Address: heather@americanbiogascouncil.org

Affiliation: American Biogas Council

Subject: ABC Comments on the LCFS 15-Day Changes - Support  
Comment:

Attached please find our comments. Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/8228-lcfs2024-VWdSYV1sVjFQZFNi.pdf](http://www.arb.ca.gov/lists/com-attach/8228-lcfs2024-VWdSYV1sVjFQZFNi.pdf)

Original File Name: 250421 ABC LCFS 15 Day Comments.pdf

Date and Time Comment Was Submitted: 2025-04-21 07:55:39

No Duplicates.

**Comment 26 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Martina

Last Name: Simpkins

Email Address: msimpkins@anewclimate.com

Affiliation: Anew Climate

Subject: Comments on the Proposed LCFS Amendments - 3rd 15-Day Notice

Comment:

Please find attached comments from Anew Climate.

Attachment: [www.arb.ca.gov/lists/com-attach/8229-lcfs2024-VTRVPQdjUXUEXQNg.pdf](http://www.arb.ca.gov/lists/com-attach/8229-lcfs2024-VTRVPQdjUXUEXQNg.pdf)

Original File Name: Anew Comments LCFS 3rd 15-day Notice.April21.2025.pdf

Date and Time Comment Was Submitted: 2025-04-21 09:05:02

No Duplicates.

**Comment 27 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 28 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Tim

Last Name: McRae

Email Address: [tmcrae@californiahydrogen.org](mailto:tmcrae@californiahydrogen.org)

Affiliation: California Hydrogen Business Council

Subject: CHBC comments on 15-day notice of LCFS modifications

Comment:

Dear Clerk -

Our apologies - I initially uploaded an early draft of our comments  
- please post this attachment as our comments on the regulation,  
not the comments filed earlier this morning.

Best regards,

Tim

Attachment: [www.arb.ca.gov/lists/com-attach/8231-lcfs2024-VTRdKwBzV21ROwdY.pdf](http://www.arb.ca.gov/lists/com-attach/8231-lcfs2024-VTRdKwBzV21ROwdY.pdf)

Original File Name: April 2025 comments on LCFS 3rd 15-day notice - CHBC.pdf

Date and Time Comment Was Submitted: 2025-04-21 10:02:04

No Duplicates.

**Comment 29 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Gal  
Last Name: Sitty  
Email Address: galsitty@kiausa.com  
Affiliation: Kia Corporation

Subject: Kia Corporation comments on the Third 15-Day Changes to LCFS Amendments  
Comment:

Kia's comments on the third 15-Day Changes to LCFS Amendments are attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8232-lcfs2024-VzxcMwBgAAwAZVQ7.pdf](http://www.arb.ca.gov/lists/com-attach/8232-lcfs2024-VzxcMwBgAAwAZVQ7.pdf)

Original File Name: Kia Comments\_THIRD 15 Day Modification to LCFS  
Ammendments\_FINAL.pdf

Date and Time Comment Was Submitted: 2025-04-21 10:39:44

No Duplicates.



**Comment 30 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Trisha

Last Name: Dello Iacono

Email Address: tdelloiacono@calstart.org

Affiliation: CALSTART

Subject: CALSTART Comments on the LCFS 15-Day Changes

Comment:

Please see attached our comments. Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/8233-lcfs2024-AjABMlxtUjVVYQc2.pdf](http://www.arb.ca.gov/lists/com-attach/8233-lcfs2024-AjABMlxtUjVVYQc2.pdf)

Original File Name: 250421 CALSTART LCFS 15 Day Comments.pdf

Date and Time Comment Was Submitted: 2025-04-21 10:47:37

No Duplicates.

**Comment 31 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Adam

Last Name: Raphaely

Email Address: araphaely@mercuria.com

Affiliation:

Subject: LCFS Third 15-Day Amendment Package

Comment:

Formal comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8235-lcfs2024-AmFTNFAjADELUIQ4.pdf](http://www.arb.ca.gov/lists/com-attach/8235-lcfs2024-AmFTNFAjADELUIQ4.pdf)

Original File Name: CARB LCFS 15 Day comments (Mercuria).pdf

Date and Time Comment Was Submitted: 2025-04-21 10:49:20

1 Duplicates.

**Comment 32 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Lexi

Last Name: Concannon

Email Address: lconcannon@3degreesinc.com

Affiliation: 3Degrees Group Inc.

Subject: 3Degrees Comments in Response to Third Notice of Public Availability of Modified  
Text

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8237-lcfs2024-U2AFZwRgBDADd1cy.pdf](http://www.arb.ca.gov/lists/com-attach/8237-lcfs2024-U2AFZwRgBDADd1cy.pdf)

Original File Name: 3Degrees Comments on LCFS Formal Rulemaking - 15 Day (April  
2025).pdf

Date and Time Comment Was Submitted: 2025-04-21 10:57:05

No Duplicates.

**Comment 33 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Casey

Last Name: Wasser

Email Address: cwasser@mosoy.org

Affiliation: Missouri Soybean Association

Subject: Third 15-Day Changes to CARB LCFS

Comment:

Comment submitted by Clerk on behalf of commenter.

Attachment: [www.arb.ca.gov/lists/com-attach/8240-lcfs2024-WzhTNFMgUGFXYlQm.pdf](http://www.arb.ca.gov/lists/com-attach/8240-lcfs2024-WzhTNFMgUGFXYlQm.pdf)

Original File Name: CARB3rd15DayNoticeMOSBAAssoc20250416.pdf

Date and Time Comment Was Submitted: 2025-04-21 11:26:05

No Duplicates.

**Comment 34 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Dan

Last Name: Bowerson

Email Address: dbowerson@autosinnovate.org

Affiliation: Alliance for Automotive Innovation

Subject: Auto Innovators Comments on LCFS 15-Day Notice

Comment:

Please find the attached comments from the Alliance for Automotive Innovation (Auto Innovators) on the third 15-Day Notice.

Attachment: [www.arb.ca.gov/lists/com-attach/8241-lcfs2024-VzZRllwpWWULUIA5.pdf](http://www.arb.ca.gov/lists/com-attach/8241-lcfs2024-VzZRllwpWWULUIA5.pdf)

Original File Name: Auto Innovators\_CARB LCFS 3rd 15-Day Notice (Apr 21 2025).pdf

Date and Time Comment Was Submitted: 2025-04-21 11:35:15

No Duplicates.

**Comment 35 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Jeremy

Last Name: Martin

Email Address: jmartin@ucs.org

Affiliation: Union of Concerned Scientists

Subject: UCS Comments on LCFS 3rd 15-day changes

Comment:

Comment submitted by Clerk on behalf of commenter.

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8242-lcfs2024-BnMCZ10vAw8GY1c4.pdf](http://www.arb.ca.gov/lists/com-attach/8242-lcfs2024-BnMCZ10vAw8GY1c4.pdf)

Original File Name: UCS Comments on April 2025 15 day changes to LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2025-04-21 11:39:12

No Duplicates.

**Comment 36 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Nancy

Last Name: Young

Email Address: nyoung@gevo.com

Affiliation: Gevo, Inc.

Subject: Gevo Comments on Third 15-Day Notice

Comment:

Please see the attached comments. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/8243-lcfs2024-AWYFZlYhUm4GX1Ix.pdf](http://www.arb.ca.gov/lists/com-attach/8243-lcfs2024-AWYFZlYhUm4GX1Ix.pdf)

Original File Name: Gevo Comments - LCFS Third 15-Day Notice-4-21-25.pdf

Date and Time Comment Was Submitted: 2025-04-21 11:59:58

No Duplicates.

**Comment 37 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Joshua

Last Name: Rahm

Email Address: jrahm@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/8244-lcfs2024-BjRQZlBjVzEAK1dn.pdf](http://www.arb.ca.gov/lists/com-attach/8244-lcfs2024-BjRQZlBjVzEAK1dn.pdf)

Original File Name: 2025-04-21 -- CARB LCFS 3rd 15 Day Notice.pdf

Date and Time Comment Was Submitted: 2025-04-21 12:07:38

No Duplicates.



**Comment 38 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Tanya  
Last Name: DeRivi  
Email Address: tderivi@wspa.org  
Affiliation: WSPA

Subject: WSPA Third LCFS 15-Day Comments 4-21-2025  
Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8245-lcfs2024-AHdcKVcmWWsFXAVx.pdf](http://www.arb.ca.gov/lists/com-attach/8245-lcfs2024-AHdcKVcmWWsFXAVx.pdf)

Original File Name: WSPA Third 15-Day Comments 4-21-2025.pdf

Date and Time Comment Was Submitted: 2025-04-21 12:41:42

No Duplicates.

**Comment 39 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Oscar  
Last Name: Garcia  
Email Address: oscar.garcia@neste.com  
Affiliation: Neste

Subject: Neste Comments on Proposed Low Carbon Fuel Standard (LCFS) Regulation  
Published on April 4  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8246-lcfs2024-BmhQMwd1AyQHZFIN.pdf](http://www.arb.ca.gov/lists/com-attach/8246-lcfs2024-BmhQMwd1AyQHZFIN.pdf)

Original File Name: Neste\_April 4 LCFS 15-day Package Comments\_April 21 2025.pdf

Date and Time Comment Was Submitted: 2025-04-21 12:43:19

No Duplicates.

**Comment 40 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Joshua

Last Name: Wilson

Email Address: josh.wilson@poet.com

Affiliation: POET

Subject: POET COMMENTS ON APRIL 4, 2025 REVISIONS TO PROPOSED LOW  
CARBON FUEL STANDARD AMENDMENTS

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8247-lcfs2024-UmJVZwY1AGIDNwU1.pdf](http://www.arb.ca.gov/lists/com-attach/8247-lcfs2024-UmJVZwY1AGIDNwU1.pdf)

Original File Name: 04212025\_POET Comment on CARB Third Revisions to  
LCFS\_FINAL.pdf

Date and Time Comment Was Submitted: 2025-04-21 12:46:46

No Duplicates.

**Comment 41 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Joseph

Last Name: Hoekstra

Email Address: hoekstra@ieta.org

Affiliation: IETA

Subject: IETA's Response to CARB's Third LCFS Notice

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8248-lcfs2024-Bm9VNgN2VmQDWlQ3.pdf](http://www.arb.ca.gov/lists/com-attach/8248-lcfs2024-Bm9VNgN2VmQDWlQ3.pdf)

Original File Name: IETA Comments-CARB LCFS Amendments-21Apr2025.pdf

Date and Time Comment Was Submitted: 2025-04-21 12:47:38

No Duplicates.

**Comment 42 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Brooke

Last Name: Holland

Email Address: bholland@kernenergy.com

Affiliation: Kern Energy

Subject: Kern Energy Comments to CARB April 4, 2025 Amendments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8249-lcfs2024-VzxXNFihAD1SCwdr.pdf](http://www.arb.ca.gov/lists/com-attach/8249-lcfs2024-VzxXNFihAD1SCwdr.pdf)

Original File Name: Kern LCFS Comments April 2025.pdf

Date and Time Comment Was Submitted: 2025-04-21 12:51:40

No Duplicates.

**Comment 43 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Michael

Last Name: Boccadoro

Email Address: mboccadoro@westcoastadvisors.com

Affiliation: Dairy Cares

Subject: Dairy Cares Comments on LCFS Third Set of 15-Day Changes

Comment:

Please see comments attached. Thank you!

Attachment: [www.arb.ca.gov/lists/com-attach/8250-lcfs2024-ATMHNAc2UzRVYQU0.pdf](http://www.arb.ca.gov/lists/com-attach/8250-lcfs2024-ATMHNAc2UzRVYQU0.pdf)

Original File Name: 250421\_Dairy\_Cares\_Comments\_on\_LCFS\_3rd\_15-Day Changes.pdf

Date and Time Comment Was Submitted: 2025-04-21 13:03:35

No Duplicates.

**Comment 44 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Cassandra

Last Name: Farrant

Email Address: cfarrant@ampamericas.com

Affiliation: Amp Americas

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

Comment:

Amp America appreciates the opportunity to submit comments in response to the third proposed Low Carbon Fuel Standard Amendments. Please see our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8251-lcfs2024-UjNSOQZ3Ag4LeQRs.pdf](http://www.arb.ca.gov/lists/com-attach/8251-lcfs2024-UjNSOQZ3Ag4LeQRs.pdf)

Original File Name: Amp Third Proposed 15- Day Admendments Comment Letter.pdf

Date and Time Comment Was Submitted: 2025-04-21 13:16:30

No Duplicates.

**Comment 45 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Gary

Last Name: Grimes

Email Address: ggrimes@worldenergy.net

Affiliation: World Energy

Subject: World Energy's Comments on the Third 15-Day Changes for the LCFS

Comment:

Please find attached for World Energy's comments in response to the Third 15-Day Changes for the Low Carbon Fuel Standard. Thank you for the opportunity to comment.

Attachment: [www.arb.ca.gov/lists/com-attach/8252-lcfs2024-UGJQY1RIUjVQZFRI.pdf](http://www.arb.ca.gov/lists/com-attach/8252-lcfs2024-UGJQY1RIUjVQZFRI.pdf)

Original File Name: 250421 World Energy - LCFS Third 15-Day Comments (Final).pdf

Date and Time Comment Was Submitted: 2025-04-21 13:26:26

No Duplicates.



**Comment 46 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Matt

Last Name: Amick

Email Address: [info@missouribiodiesel.org](mailto:info@missouribiodiesel.org)

Affiliation: Biodiesel Coalition of Missouri

Subject: LCFS Comments

Comment:

See attached comments from the Biodiesel Coalition of Missouri.

Attachment: [www.arb.ca.gov/lists/com-attach/8253-lcfs2024-VzVQP1c5AjVXOFQx.pdf](http://www.arb.ca.gov/lists/com-attach/8253-lcfs2024-VzVQP1c5AjVXOFQx.pdf)

Original File Name: Biodiesel Coalition of Missouri LCFS Comments 4.21.25.pdf

Date and Time Comment Was Submitted: 2025-04-21 13:28:36

No Duplicates.

**Comment 47 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Becky

Last Name: Kinder

Email Address: bkinder@kysoy.org

Affiliation: Kentucky Soybean Association

Subject: LCFS Comments from Kentucky Soybean Association

Comment:

See attached comments from the Kentucky Soybean Association.

Attachment: [www.arb.ca.gov/lists/com-attach/8254-lcfs2024-AmkAY1U6WX4Fdlc0.pdf](http://www.arb.ca.gov/lists/com-attach/8254-lcfs2024-AmkAY1U6WX4Fdlc0.pdf)

Original File Name: Kentucky Soybean Association LCFS Comments 4 21 25.pdf

Date and Time Comment Was Submitted: 2025-04-21 13:31:55

No Duplicates.

**Comment 48 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Miles

Last Name: Heller

Email Address: hellermt@airproducts.com

Affiliation: Air Products

Subject: LCFS 3rd 15-day package comments

Comment:

We appreciate the opportunity to comment - please find our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8255-lcfs2024-AGEAbwNwV1sGcAl7.pdf](http://www.arb.ca.gov/lists/com-attach/8255-lcfs2024-AGEAbwNwV1sGcAl7.pdf)

Original File Name: Air Products Comments LCFS 3rd 15-Day Package final.pdf

Date and Time Comment Was Submitted: 2025-04-21 14:19:31

No Duplicates.

**Comment 49 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Kaleb

Last Name: Little

Email Address: little@kansassoybeans.org

Affiliation:

Subject: Proposed LCFS Changes Miss the Mark for Domestic Fuels, Science-Based Directive  
Comment:

See attached comments from the Kansas Soybean Association.

Attachment: [www.arb.ca.gov/lists/com-attach/8256-lcfs2024-VWdWYAQ3VjBWfQMz.pdf](http://www.arb.ca.gov/lists/com-attach/8256-lcfs2024-VWdWYAQ3VjBWfQMz.pdf)

Original File Name: 2025-04-21 CARB 3rd 15 Day Notice - KS Soybean Association.pdf

Date and Time Comment Was Submitted: 2025-04-21 14:22:18

No Duplicates.

**Comment 50 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Nicole

Last Name: Rice

Email Address: nicolerice@ca-rta.org

Affiliation: CA Renewable Transportation Alliance

Subject: CRTA Comment Letter on LCFS 3rd 15 Day Package

Comment:

We appreciate this opportunity to submit these comments.

Attachment: [www.arb.ca.gov/lists/com-attach/8257-lcfs2024-BmUFcVUgV2VWD1U2.pdf](http://www.arb.ca.gov/lists/com-attach/8257-lcfs2024-BmUFcVUgV2VWD1U2.pdf)

Original File Name: CRTA Comments on LCFS 3rd 15 Day Pkg\_FINAL - 042125.pdf

Date and Time Comment Was Submitted: 2025-04-21 14:22:26

No Duplicates.

**Comment 51 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Drew

Last Name: Lyon

Email Address: drew@mnsoybean.com

Affiliation:

Subject: Minnesota Soybean Growers Association Comments on LCFS

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8258-lcfs2024-Am8FcAZgUGJWD1Az.docx](http://www.arb.ca.gov/lists/com-attach/8258-lcfs2024-Am8FcAZgUGJWD1Az.docx)

Original File Name: MSGA Comments CARB 3rd 15 Day Notice.docx

Date and Time Comment Was Submitted: 2025-04-21 14:37:00

No Duplicates.

**Comment 52 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Corey

Last Name: McCray

Email Address: cmccray@nopa.org

Affiliation: National Oilseed Processors Association

Subject: LCFS Comments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8259-lcfs2024-Uz0FbFIjAjAGX1Az.pdf](http://www.arb.ca.gov/lists/com-attach/8259-lcfs2024-Uz0FbFIjAjAGX1Az.pdf)

Original File Name: NOPA Comments 3rd 15 Day FINAL.pdf

Date and Time Comment Was Submitted: 2025-04-21 14:49:31

No Duplicates.

**Comment 53 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Orran

Last Name: Balagopalan

Email Address: obalagopalan@smwlaw.com

Affiliation: Defensores Del Valle Central Para El Agu

Subject: Comments on the Third 15-Day Changes to the LCFS Amendments

Comment:

Please find the comments submitted on behalf of Defensores Del Valle Central Para El Agua Y Aire Limpio, Leadership Counsel for Justice and Accountability, Animal Legal Defense Fund, Food & Water Watch, and Center for Food Safety, on the Third Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information regarding amendments to the Low Carbon Fuel Standard.

Attachment: [www.arb.ca.gov/lists/com-attach/8260-lcfs2024-WmhWYFBjVzFVfgAw.pdf](http://www.arb.ca.gov/lists/com-attach/8260-lcfs2024-WmhWYFBjVzFVfgAw.pdf)

Original File Name: 2025-04-21 Comments on Third 15-Day Amendments to LCFS.pdf

Date and Time Comment Was Submitted: 2025-04-21 14:45:19

No Duplicates.



**Comment 54 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Sherrie

Last Name: Merrow

Email Address: smerrow@transportproject.org

Affiliation: The Transport Project

Subject: Comments on the August 2024 Proposed Changes to the LCFS

Comment:

Please the attached file with The Transport Project's comment letter on the CARB LCFS Third 15-Day Package, including our support and request for expedient approval of the Package.

Thank you,

Sherrie Merrow

Director, State Government Affairs

The Transport Project

Washington, DC

Attachment: [www.arb.ca.gov/lists/com-attach/8261-lcfs2024-UiYHdVMiAAwDZgBv.pdf](http://www.arb.ca.gov/lists/com-attach/8261-lcfs2024-UiYHdVMiAAwDZgBv.pdf)

Original File Name: TTP Comments on CA LCFS 3rd Notice Proposed Amendments - 4.21.2025.pdf

Date and Time Comment Was Submitted: 2025-04-21 15:01:41

No Duplicates.

**Comment 55 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Ben

Last Name: Steyer

Email Address: bsteyer@michigansoybean.org

Affiliation:

Subject: CARB comments from Michigan Soybean Association

Comment:

See attached comments from Michigan Soybean Association

Attachment: [www.arb.ca.gov/lists/com-attach/8262-lcfs2024-B2YGcAR3VmwFbwJd.pdf](http://www.arb.ca.gov/lists/com-attach/8262-lcfs2024-B2YGcAR3VmwFbwJd.pdf)

Original File Name: April 2025 CARB 3rd 15 Day Notice.pdf

Date and Time Comment Was Submitted: 2025-04-21 15:07:37

No Duplicates.

**Comment 56 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Rhia

Last Name: Davis

Email Address: Rhiannon.Davis@electrifyamerica.com

Affiliation:

Subject: Electrify America comments on Proposed Third 15-Day Changes

Comment:

See attached letter for our comments.

Attachment: [www.arb.ca.gov/lists/com-attach/8263-lcfs2024-Wz5VP1w4VWUEdgR2.pdf](http://www.arb.ca.gov/lists/com-attach/8263-lcfs2024-Wz5VP1w4VWUEdgR2.pdf)

Original File Name: Electrify America\_LCFS letter \_15 Day Changes.pdf

Date and Time Comment Was Submitted: 2025-04-21 15:17:02

No Duplicates.

**Comment 57 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Daisuke

Last Name: Yanagisawa

Email Address: lag@jetro.go.jp

Affiliation:

Subject: Japan Hydrogen Forum (JH2F) \_LCFS 15-day Notice Comments

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8264-lcfs2024-UjhdM1NgUWRRCA11.pdf](http://www.arb.ca.gov/lists/com-attach/8264-lcfs2024-UjhdM1NgUWRRCA11.pdf)

Original File Name: JH2F\_LCFS\_Comments\_4.21.2025\_final.docx.pdf

Date and Time Comment Was Submitted: 2025-04-21 15:38:44

No Duplicates.

**Comment 58 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Brian  
Last Name: Casey  
Email Address: bcasey@usventure.com  
Affiliation: U.S. Venture

Subject: RE: Comments on the Third 15-Day Changes to the Low Carbon Fuel Standard  
Amendments  
Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8265-lcfs2024-UCVQJQB3UFwBawZl.docx](http://www.arb.ca.gov/lists/com-attach/8265-lcfs2024-UCVQJQB3UFwBawZl.docx)

Original File Name: USV LCFS Comments 4.21.25.docx

Date and Time Comment Was Submitted: 2025-04-21 16:09:09

No Duplicates.

**Comment 59 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Sean

Last Name: Lock

Email Address: sean@monarchbio.com

Affiliation: Monarch Bioenergy LLC

Subject: RE: Comments on April 4th, 2025, Proposed LCFS Amendments (Third 15-Day  
Package)

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8266-lcfs2024-AWxQOQFuBzULf1c0.docx](http://www.arb.ca.gov/lists/com-attach/8266-lcfs2024-AWxQOQFuBzULf1c0.docx)

Original File Name: Monarch LCFS 4.18 SL.docx

Date and Time Comment Was Submitted: 2025-04-21 16:14:48

No Duplicates.

**Comment 60 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Cory-Ann

Last Name: Wind

Email Address: cwind@cleanfuels.org

Affiliation: Clean Fuels Alliance America

Subject: CFAA and CABA comments on the third 15-day notice

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8267-lcfs2024-BmVVNVmZWGoFXAFi.pdf](http://www.arb.ca.gov/lists/com-attach/8267-lcfs2024-BmVVNVmZWGoFXAFi.pdf)

Original File Name: CFAA CABA Comments on 3rd 15 Day Package.Final.pdf

Date and Time Comment Was Submitted: 2025-04-21 16:25:32

No Duplicates.

**Comment 61 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Daniel  
Last Name: Berglund  
Email Address: berg6@hughes.net  
Affiliation: Texas Soybean Association

Subject: LCFS Comments  
Comment:

See attached comments from Texas Soybean Association

Attachment: [www.arb.ca.gov/lists/com-attach/8268-lcfs2024-USVTMFwIU2EEcVQL.docx](http://www.arb.ca.gov/lists/com-attach/8268-lcfs2024-USVTMFwIU2EEcVQL.docx)

Original File Name: Texas Soybean Association LCFS Comments 4 21 25.docx

Date and Time Comment Was Submitted: 2025-04-21 16:47:30

No Duplicates.



**Comment 62 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Dallas

Last Name: Spiecker

Email Address: dallas.spiecker@maasenergy.com

Affiliation: Maas Energy Works

Subject: Maas Energy Works - LCFS Amendments - Letter of Support

Comment:

Please see comment letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8269-lcfs2024-Am9cP1chBQkKYANg.pdf](http://www.arb.ca.gov/lists/com-attach/8269-lcfs2024-Am9cP1chBQkKYANg.pdf)

Original File Name: MEW LCFS\_Comment.pdf

Date and Time Comment Was Submitted: 2025-04-21 16:52:33

No Duplicates.

**Comment 63 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Andy

Last Name: Foster

Email Address: andy.foster@aemetis.com

Affiliation: Aemetis, Inc.

Subject: Aemetis, Inc. Comments on Proposed 15-day Rule (LCFS)

Comment:

Please find attached comment letter. Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/8270-lcfs2024-VzZRMII+U2UCcAFo.pdf](http://www.arb.ca.gov/lists/com-attach/8270-lcfs2024-VzZRMII+U2UCcAFo.pdf)

Original File Name: Aemetis\_CARB\_15 day LCFS rule amendment\_comment.f.pdf

Date and Time Comment Was Submitted: 2025-04-21 16:58:49

No Duplicates.

**Comment 64 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Nina

Last Name: Robertson

Email Address: nrobertson@earthjustice.org

Affiliation:

Subject: Comments of Communities for a Better Environment and Earthjustice

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8271-lcfs2024-VzsHY1QzV3cBWFQg.pdf](http://www.arb.ca.gov/lists/com-attach/8271-lcfs2024-VzsHY1QzV3cBWFQg.pdf)

Original File Name: LCFS Third15-day comments-CBE Earthjustice.pdf

Date and Time Comment Was Submitted: 2025-04-21 16:42:35

No Duplicates.

**Comment 65 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Jason

Last Name: Marshall

Email Address: jason.marshall@crc.com

Affiliation: California Resources Corporation

Subject: Comment to April 4, 2025, 3rd 15-Day Modification to Proposed LCFS Rule  
Comment:

Please see attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/8272-lcfs2024-AGNTJ1w+WVUDKAFe.pdf](http://www.arb.ca.gov/lists/com-attach/8272-lcfs2024-AGNTJ1w+WVUDKAFe.pdf)

Original File Name: CRC - April 4 2025 Proposed Third 15-Day LCFS Changes - Comment Letter.pdf

Date and Time Comment Was Submitted: 2025-04-21 16:58:51

No Duplicates.

**Comment 66 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Nancy

Last Name: Johnson

Email Address: nancy.johnson@ndsga.com

Affiliation: ND Soybean Growers Association

Subject: Comments on Proposed Changes to LCFS

Comment:

See attached comments from North Dakota Soybean Growers  
Association.

Attachment: [www.arb.ca.gov/lists/com-attach/8273-lcfs2024-UWNSZAY1WT8CKQEx.pdf](http://www.arb.ca.gov/lists/com-attach/8273-lcfs2024-UWNSZAY1WT8CKQEx.pdf)

Original File Name: 2025-04-16 CARB 3rd 15 Day Notice NDSGA Comments.pdf

Date and Time Comment Was Submitted: 2025-04-21 17:15:25

No Duplicates.

**Comment 67 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: David

Last Name: Pettit

Email Address: dpettit@biologicaldiversity.org

Affiliation: Center for Biological Diversity

Subject: Proposed Amendment to Title 17, California Code of Regulations Section 95482(h)  
Comment:

Please see attached letter from the Center for Biological Diversity  
and Food & Water Watch.

Attachment: [www.arb.ca.gov/lists/com-attach/8274-lcfs2024-VGZWZQAvWToLOVR6.docx](http://www.arb.ca.gov/lists/com-attach/8274-lcfs2024-VGZWZQAvWToLOVR6.docx)

Original File Name: 25.04.21 CBD LCFS Comment\_.docx

Date and Time Comment Was Submitted: 2025-04-21 17:21:42

No Duplicates.

**Comment 68 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Don

Last Name: Schinskedon

Email Address: don@lcfcoalition.com

Affiliation: Low Carbon Fuels Coalition

Subject: Comments on Modified Text for the Proposed LCFS Amendments in Response to OAL  
Disapproval

Comment:

Attached find comments from the Low Carbon Fuels Coalition re. the  
Modified Text for Proposed LCFC Amendments.

Thank you.

Attachment: [www.arb.ca.gov/lists/com-attach/8275-lcfs2024-AGxSN1M0AjIAWQJu.pdf](http://www.arb.ca.gov/lists/com-attach/8275-lcfs2024-AGxSN1M0AjIAWQJu.pdf)

Original File Name: LCFC letter in response to OAL amendments Apr2025-with logos.pdf

Date and Time Comment Was Submitted: 2025-04-21 17:22:53

No Duplicates.

**Comment 69 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Christopher

Last Name: Bliley

Email Address: CBliley@growthenergy.org

Affiliation: Growth Energy

Subject: Growth Energy Comments on Third 15-Day Changes

Comment:

The attached file contains comments submitted on behalf of Growth Energy regarding the Third 15-Day Changes to the LCFS Amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/8276-lcfs2024-AWYAdFY4BCAEdgZu.pdf](http://www.arb.ca.gov/lists/com-attach/8276-lcfs2024-AWYAdFY4BCAEdgZu.pdf)

Original File Name: Growth Energy Comments on Third 15-Day Changes to LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2025-04-21 17:46:36

No Duplicates.



**Comment 70 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Jamie

Last Name: Hall

Email Address: jamie@evrealtyus.com

Affiliation:

Subject: Joint MHD Infrastructure Providers comments on 3rd 15-day changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8277-lcfs2024-WzZXOVI3UI4EcIMh.pdf](http://www.arb.ca.gov/lists/com-attach/8277-lcfs2024-WzZXOVI3UI4EcIMh.pdf)

Original File Name: MHD Providers LCFS 3rd 15-day changes comments final.pdf

Date and Time Comment Was Submitted: 2025-04-21 18:56:00

No Duplicates.

**Comment 71 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Alexis

Last Name: Moch

Email Address: amoch@prologis.com

Affiliation: Prologis

Subject: Prologis comments on 3rd 15-Day Changes

Comment:

Please find our comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8278-lcfs2024-B3dRJQdpWWYEBQlu.pdf](http://www.arb.ca.gov/lists/com-attach/8278-lcfs2024-B3dRJQdpWWYEBQlu.pdf)

Original File Name: Prologis LCFS Comments 3rd 15-Day Changes.pdf

Date and Time Comment Was Submitted: 2025-04-21 19:03:43

No Duplicates.

**Comment 72 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: David

Last Name: Kubik

Email Address: david.kubik@ilsoy.org

Affiliation: IL Soybean Growers

Subject: Proposed 15-Day Changes to the Proposed Regulation Order - IL Soybean Comments  
Comment:

Attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8279-lcfs2024-BjQCNAc0WD4BKgc3.pdf](http://www.arb.ca.gov/lists/com-attach/8279-lcfs2024-BjQCNAc0WD4BKgc3.pdf)

Original File Name: 2025-04-21 CARB 3rd 15 Day Notice - IL Soybean.pdf

Date and Time Comment Was Submitted: 2025-04-21 19:23:37

No Duplicates.

**Comment 73 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Marcelo

Last Name: Queiroz

Email Address: marcelo.queiroz@minervafoods.com

Affiliation: Minerva Biodiesel

Subject: Minerva Biodiesel comment on the LCFS Third 15-Day Changes

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8280-lcfs2024-AWwBblY5UGYGclQi.pdf](http://www.arb.ca.gov/lists/com-attach/8280-lcfs2024-AWwBblY5UGYGclQi.pdf)

Original File Name: Minerva comment on Third 15-Day Changes 04 21 25.pdf

Date and Time Comment Was Submitted: 2025-04-21 19:40:59

No Duplicates.

**Comment 74 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Neil

Last Name: Koehler

Email Address: neil.koehler@kbe-llc.com

Affiliation: Renewable Fuels Association

Subject: RFA Comments on 3rd 15 day package-Proposed LCFS Amendments

Comment:

Comments attached

Attachment: [www.arb.ca.gov/lists/com-attach/8281-lcfs2024-ViRRMVAwVlpRNAdo.pdf](http://www.arb.ca.gov/lists/com-attach/8281-lcfs2024-ViRRMVAwVlpRNAdo.pdf)

Original File Name: RFA Comments on CARB LCFS 3rd 15-day Comment Proposal 2025-04-21.pdf

Date and Time Comment Was Submitted: 2025-04-21 20:11:53

No Duplicates.

**Comment 75 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Steve

Last Name: Bond

Email Address: [steve.bond@crimsonrenewable.com](mailto:steve.bond@crimsonrenewable.com)

Affiliation:

Subject: Comments 15-3

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/8282-lcfs2024-BmUGcII6Az1VIFQ7.pdf](http://www.arb.ca.gov/lists/com-attach/8282-lcfs2024-BmUGcII6Az1VIFQ7.pdf)

Original File Name: Crimson Renewable Energy Comment - CARB 15-3 041525.pdf

Date and Time Comment Was Submitted: 2025-04-21 20:27:28

No Duplicates.

**Comment 76 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Mikhael

Last Name: Skvarla

Email Address: mik@calobby.com

Affiliation: California Hydrogen Coalition

Subject: California Hydrogen Coalition comments on the LCFS 3rd 15-day changes

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/8283-lcfs2024-B2RdM1Q2V1tXPQRn.pdf](http://www.arb.ca.gov/lists/com-attach/8283-lcfs2024-B2RdM1Q2V1tXPQRn.pdf)

Original File Name: CHC LCFS 3rd 15-day Comments.pdf

Date and Time Comment Was Submitted: 2025-04-21 20:14:31

No Duplicates.

**Comment 77 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Stefan

Last Name: Maupin

Email Address: [smaupin@tnsoybeans.org](mailto:smaupin@tnsoybeans.org)

Affiliation:

Subject: 3rd 15 day Notice LCFS

Comment:

Attachment: [www.arb.ca.gov/lists/com-attach/8284-lcfs2024-VyNVPVwCV3cGb1cu.pdf](http://www.arb.ca.gov/lists/com-attach/8284-lcfs2024-VyNVPVwCV3cGb1cu.pdf)

Original File Name: TN Soybean Association CARB 3rd 15 day Notice.pdf

Date and Time Comment Was Submitted: 2025-04-21 20:49:11

No Duplicates.



**Comment 78 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Alfredo

Last Name: Arredondo

Email Address: alfredo@resolutecompany.com

Affiliation: Green Hydrogen Coalition

Subject: Green Hydrogen Coalition Comments on 3rd 15 Day for LCFS

Comment:

GHC Comments on 3rd 15 Day Amendment Release

Attachment: [www.arb.ca.gov/lists/com-attach/8285-lcfs2024-Wj1XOQdlUV1QZQZ0.pdf](http://www.arb.ca.gov/lists/com-attach/8285-lcfs2024-Wj1XOQdlUV1QZQZ0.pdf)

Original File Name: GHC 3rd 15-Day Comments Final.pdf

Date and Time Comment Was Submitted: 2025-04-21 21:24:02

No Duplicates.

**Comment 79 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Fred  
Last Name: Ghatala  
Email Address: fghatala@advancedbiofuels.ca  
Affiliation: Advanced Biofuels Canada Association

Subject: RE: Response to April 4th 15-Day Modifications to Proposed Regulation Order  
Comment:

CARB Staff,

Please find attached comments from ABFC on the subject publication.

Please let us know if any issues accessing these comments.

Regards,

Advanced Biofuels Canada

Attachment: [www.arb.ca.gov/lists/com-attach/8286-lcfs2024-WzpQNAFmVGQEXQBj.pdf](http://www.arb.ca.gov/lists/com-attach/8286-lcfs2024-WzpQNAFmVGQEXQBj.pdf)

Original File Name: ABFC\_CARB\_LCFS\_15\_day\_comments\_April\_21\_2025.pdf

Date and Time Comment Was Submitted: 2025-04-21 21:40:24

No Duplicates.

## **Comment 80 for Proposed Low Carbon Fuel Standard Amendments (lcfs2024) - 15-3.**

First Name: Andrew

Last Name: Craig

Email Address: [acraig@calbioenergy.com](mailto:acraig@calbioenergy.com)

Affiliation:

Subject: CalBio Comments on Third 15-Day LCFS Amendments

Comment:

2134 E. Mineral King Ave

Visalia, CA 93292

559-667-9560

April 21, 2025

Ms. Rajinder Sahota

Deputy Executive Officer - Climate Change & Research

California Air Resources Board

1001 I Street

Sacramento, California 95814

Re: California Bioenergy's Comments on CARB's April 4th, 2025 Third 15-Day Amendments to the Low Carbon Fuel Standard Regulation

Dear Ms. Sahota,

Thank you for the opportunity to provide these comments to California Air Resources Board (CARB) relating to the Third 15-Day Amendments to the Low Carbon Fuel Standard (LCFS) Regulation released on April 4th, 2025. California Bioenergy LLC (CalBio) is appreciative of CARB's efforts over the past several years to develop the LCFS program into one of the most impactful policies to support the transition from fossil fuels to lower carbon alternatives.

Founded in 2006, CalBio works closely with California dairy farm families along with local, state, and federal agencies to reduce methane emissions. CalBio is committed to enhancing environmental sustainability for all Californians through our digester projects which produce carbon-negative renewable natural gas and electricity.

CalBio urges CARB and OAL to adopt the latest 15-Day Rulemaking Package as amended

We write these comments to commend CARB's continued leadership in advancing policies that address climate change, promote public health, and stimulate economic growth. The LCFS has been instrumental in facilitating the development of dairy digesters. According to data from the California Department of Food and Agriculture (CDFA), dairy digesters in California are on track to collectively reduce approximately 2.4 million metric tons of CO<sub>2</sub>-equivalent (MTCO<sub>2</sub>e) emissions annually--marking significant progress toward achieving the 40% methane reduction target set by SB 1383.

1 California Department of Food and Agriculture Dairy Digester Research and Development Program - Program-Level Data (Updated January 8, 2025)

[https://www.cdfa.ca.gov/oefi/DDRDP/docs/DDRDP\\_Program\\_Level\\_Data.pdf](https://www.cdfa.ca.gov/oefi/DDRDP/docs/DDRDP_Program_Level_Data.pdf)

Also important to consider are the environmental, health, and

economic benefits of the LCFS program. Since its inception, the program has achieved a reduction of approximately 13% in the carbon intensity of transportation fuels, displacing over 30 billion gallons of petroleum fuel and reducing emissions equivalent to removing 6.4 million cars from the road. This reduction in fossil fuels translates directly into public health benefits. CARB estimates that from 2024 to 2046, the LCFS will result in \$5 billion in savings from avoided health outcomes, primarily through enhanced air quality.

While we believe there are aspects of the regulation which could be improved - namely the concerns we had raised in previous around data substitution methodologies in Section 95491.2, we believe CARB and the Office of Administrative Law (OAL) should adopt the final draft regulation of the LCFS Program as written.<sup>34</sup> Given the growing LCFS credit bank, it is imperative that the effective date of the regulation be applicable to Q1 2025 dispensing fuel reporting activities such that the LCFS Carbon Intensity Benchmarks stated in Table 2 and Table 3 of the Proposed Regulation remain in full effect.

At a time where ambitious climate action is needed now more than ever, the LCFS remains the primary example for other states and the world to follow. We appreciate CARB's dedication to environmental stewardship and stand ready to support the continued success of the LCFS.

Sincerely,  
Andrew Craig  
Vice President, Greenhouse Gas Programs  
California Bioenergy LLC

2 CARB updates the Low Carbon Fuel Standard to increase access to cleaner fuels and zero-emission transportation options  
<https://ww2.arb.ca.gov/news/carb-updates-low-carbon-fuel-standard-increase-access-cleaner-fuels-and-zero-emission>

3 CalBio Comments on CARB's Proposed Tier 1 Simplified Calculator for Biomethane from Anaerobic Digestion of Dairy and Swine Manure released December 19, 2023

<https://www.arb.ca.gov/lists/com-attach/6968-lcfs2024-VTYCZQFsV2ZRPgBv.pdf>

4 California Bioenergy's Comments on CARB's April 10th, 2024 Public Hearing on the Low Carbon Fuel Standard  
<https://ww2.arb.ca.gov/form/public-comments/submissions/11571>

Attachment: [www.arb.ca.gov/lists/com-attach/8287-lcfs2024-AGNcO1U4BDUBblQ7.pdf](http://www.arb.ca.gov/lists/com-attach/8287-lcfs2024-AGNcO1U4BDUBblQ7.pdf)

Original File Name: CalBio Comments on 4-4-2025 15-Day Rulemaking.pdf

Date and Time Comment Was Submitted: 2025-04-21 22:21:23

No Duplicates.

**Comment 81 for Proposed Low Carbon Fuel Standard Amendments  
(lcfs2024) - 15-3.**

First Name: Colin

Last Name: Murphy

Email Address: cwmurphy@ucdavis.edu

Affiliation: UC Davis Institute of Transportation Stu

Subject: Comment on 3rd 15 day amendment package

Comment:

Hello,

Please find attached comments on the proposed amendments to the  
LCFS from the UC Davis Institute of Transportation Studies.

Thank you,

Colin Murphy

Attachment: [www.arb.ca.gov/lists/com-attach/8288-lcfs2024-AndUMVEPVmEFYgZw.pdf](http://www.arb.ca.gov/lists/com-attach/8288-lcfs2024-AndUMVEPVmEFYgZw.pdf)

Original File Name: UC Davis Comments on 3rd 15 Day Package of LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2025-04-21 23:09:58

No Duplicates.