



Environmental & Legal Consultation

August 18, 2009

Mary Nichols, Chairman
Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: Comments on Low-Carbon-Fuel-Standard Regulation

Dear Chairman Nichols and Board Members,

Given the potentially corrosive properties of ethanol and other biofuels proposed in the Fuel Pathway chart approved at the Board hearing on April 23, 2009, and biofuels presented now for public comment July 20, 2009, a full multimedia analysis for each fuel type is warranted. Recent evidence that ethanol can destroy engines in large numbers, see link below, enhances ARB's need and obligation to conduct a thorough multimedia analysis for each fuel type to ensure compatibility of the fuel mix with all parts throughout the transportation chain as well as assess all environmental harms.

“Not only is ethanol proving to be a dud as a fuel substitute but there is increasing evidence that it is destroying engines in large numbers,” **BusinessWeek**, May 14, 2009,

http://www.businessweek.com/lifestyle/content/may2009/bw20090514_058678.htm

Without a full multimedia review, as legally required under §43830, ARB knowingly risks issues of financial responsibility and state indemnification later in the midst of the State's unprecedented budget crisis. Moreover, ARB knowingly risks imposing substantial environmental harm from unknown effects from numerous fuel types and varieties under ARB's current contemplation. Thank you for your consideration.

Sincerely,

Naomi Melver

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