
From: Simon C. Bird [sbird@agrefresh.org]
Sent: Tuesday, November 10, 2009 3:53 PM
To: Northeast & Mid-Atlantic LCFS
Subject: LCFS Written Comment

Categories: Comments

AgRefresh applauds NESCAUMs and the States Commissioner's efforts to create a Low Carbon Fuel Standard for the Northeast and Mid-Atlantic states. The LCFS as proposed is not duplicative to the Federal RFS standard, because while the RFS does take GHG emission reductions into account, it is focused, as its name implies, on the Energy Independence and Security of the US through the increased production of biofuels. LCFS programs are therefore important companions to the RFS to ensure that GHG emission reductions in the transportation sector are achieved.

As NESCAUM considers the program rules, AgRefresh asks that the process for introductions and updating of new fuel pathways be carefully considered. No biofuel pathway is truly the same, and by conforming competing technologies and processes to set and unchanging pathways it disincentivizes innovation. For fuel producers to find real value and a market for reducing their fuels CI, there must be a streamlined and effective process for the creation of new fuel pathways, and documentation of their carbon intensity. This attribute is essential to a successful LCFS, one with competitive market pressure incentivizing the reduction of fuel carbon intensity values.

Thank you,

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