



Wade Randlett  
Co-Founder  
NextFuels, Inc.

DOCKET	
07-ARB-1032	
DATE	DEC 16 2008
RECD	JAN 26 2009

California Air Resources Board  
Headquarters Building  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

December 16, 2008

Dear Chairperson Mary Nichols:

NextFuels submitted the attached comment letter on November 14, 2008. We appreciate the preliminary clarifications provided during the December 2, 2008 workshop. Much more information on ARB's proposed approach for diesel compliance, however, is needed for us to provide meaningful comments.

Specifically, the following items need to be shared in order for stakeholders and the public to understand the assumptions and implications of the proposed Draft California Low Carbon Fuel Standard (LCFS) Regulations.

1. Carbon intensity default values being considered for the Diesel Lookup Table,
2. The yet-to-be-released Carbon Intensity Calculation Software Tool, and
3. The process to differentiate sustainable palm from other feedstocks, especially differential land use effects of sustainable palm.

We are coordinating with ARB staff and look forward to working together to help achieve the goals of the Low-Carbon Fuel Standard and AB 32.

NextFuels request biodiesel carbon intensity numbers to be released at least three weeks prior to these proposed regulations being submitted to the Office of Administrative Law in order to allow time for adequate public review and analysis of the proposal. After ARB releases palm-based biodiesel numbers and shares a preview of the Carbon Intensity Calculation Software Tool, NextFuels expects the opportunity to submit detailed input and clarifications that ARB staff incorporates into the final proposed LCFS Regulations.

Sincerely,

Wade Randlett  
Co-Founder  
NextFuels, Inc.



Wade Randlett  
Co-Founder  
NextFuels, Inc.

CC: Board Members, CARB  
Jackalyne Pfannenstiel, Chairman, CEC  
Jim Boyd, Vice Chair, CEC  
James Goldstene, Executive Officer

Attachment: NextFuels November 14, 2008 Comment Letter