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To: Carla Peterman, Lead Commissioner

August 16, 2012

Fr: Dr. Michael Bennett, Pharm.D.

Member of Experimental Aircraft Association (EAA), Aircraft Owners and Pilots Association (AOPA), and ASTM International

RE: Comments and Criticisms on the Lead Commissioner Workshop on Advanced Ethanol Production and CEPIP, conducted on August 1, 2012.

References (see attached files)

After reading over the numerous public documents on the CEC website and listening to the full, nearly 6 hour WebEx recording, I am very concerned and disturbed at what I see as another Corporate Welfare Program. It is apparent that the taxpayers are getting very little return for their "forced investment" in "advanced ethanol production" and this program needs to halt immediately! The corporate executives who presented are asking for a handout for an industry that is falling very short on it's long overdue promises. Too many tax dollars have already been spent propping up this failing industry.

Consumers are being forced to use a fuel additive (ethanol) that is corrosive, less energy efficient, draws water and presents high potential dangers to public safety. Ethanol has had very negative economic effects on the boating, aviation, small engine, and off-road communities. Ethanol fuels have caused major damage to older cars, expensive boats and in a few documented cases, rescuers had to deal with failed small engines while trying to save peoples lives. Here in Southern California, firefighters could not start their chainsaws due to water contamination. As stated before, ethanol can attract water and cause a phase separation. Consumers across the US are now asking why ethanol is being forced into their fuel supply. It is claimed ethanol is good for the environment? In my professional opinion, the net benefit of mixing ethanol in our gasoline is less than ZERO. Simply put...too many tax dollars have been spent on the wrong molecule...ethanol. It is time to seriously consider taking all ethanol out of our premium grade gasolines and have this available for those who must not have ethanol.

AB118 is supposed to be about "Alternative Biofuels" yet I see far too much emphasis on ethanol. Why have your advisory "experts" not explored in sufficient detail the merits of far better oxygenates like bio-ETBE, bio-butanol, and so forth? Are you stuck on ethanol? Attached to my comments are a select compilation of presentations that the Europeans and Asian Pacific countries have accepted. They too have a goal to reduce pollution, yet they apparently have a more open mind to what would be the most ideal molecule(s) to add to their existing gasoline supply.

Point of fact is that bio-ETBE may not be a politically correct oxygenate to select, since it is related to the now feared and banned MTBE. Unfortunately, the legal "profession" was the sole instigator and propagated a doomsday-like scenario to the ignorant masses regarding MTBE. However, the world's toxicological and environmental data on

MTBE (and more so for bio-ETBE) shows it to be relatively benign with regard to human health. MTBE just stinks, literally, but if you bathed in it, you would not likely die - unlike lead poisoning that still remains in all of our aviation fuel that we pilots are forced to burn! Wouldn't it be better to have airplanes use unleaded fuel? At this point in time, aircraft owners cannot get unleaded fuel at the local service station, as it is contaminated with ethanol and FAA regulations state NO ETHANOL IS ALLOWED. And for good reason. Interestingly, the group that the FAA (and other regulators) rely on to come up with a specific fuel standard (ASTM International, www.astm.org) has NOT approved any ethanol-containing fuel. That should tell you something! However, there are 3 standards that allow for using an auto fuel (ASTM D4814, D6227, D7547) WITH NO ETHANOL!! My point here is that if producers (refiners) and terminals do not make available a ZERO ethanol fuel, pilots will be forced to use LEADED fuels, and that is far worse than MTBE. At present, bio-ETBE is the most ideal oxygenate.

The solution to the above problems is quite simple...do not force consumers to use an ethanol-contaminated fuel. Why not let the market decide? I would bet that if a retail gas station in California (and there are a few) would offer "pure gas", meaning it had no ethanol in it, consumers would flock to it. If it had bio-ETBE in it to get the octane up AND be good for the environment, that same consumer would likely not care. But the near-sighted authorities, like CARB, have stalled efforts of some producers. For an interesting take on consumers dislike for ethanol in their fuel, go to www.pure-gas.org. Notice the lack of choice for consumers in California.

My final recommendation is to stop any more monies going to the ethanol producers. If they cannot make it alone in the marketplace, why spend more tax dollars? Perhaps when there is a huge excess of ethanol, they may want to consider converting it to a more useful molecule...bio-ETBE.