



May 14, 2013

Alexander "Lex" Mitchell
Air Pollution Specialist
California Air Resources Board
State of California
Via electronic mail to amitchel@arb.ca.gov

Re: Support of CBA/ NBB Comments on
ADF Regulatory Concepts White Paper, Alternative Diesel Fuel Rulemaking

Dear Mr. Mitchell,

The Biodiesel Cooperative of Los Angeles Inc. is pleased to endorse the written comments of the California Biodiesel Alliance and the National Biodiesel Board on the "White Paper—Discussion of Conceptual Approach to Regulation of Alternative Diesel Fuels" dated February 15, 2013 and discussed at the recent CARB workshop April 23, 2013.

The Biodiesel Co-op has held a CDFA Developmental Engine Fuels Variance since March 17, 2006 and has had hundreds of private light-duty vehicle owners participate as members of our "fleet". We utilize ASTM 6751-compliant B99 biodiesel produced by Imperial Western Products/Biotane and New Leaf Biofuels. Currently, we have 67 active participants, driving a variety of late model and older cars, SUV's and pick up trucks throughout the Great Los Angeles area. Frankly, it is puzzling to us that CARB has never utilized user-groups such as ours as field-testing units to do real-world analysis for biodiesel air-quality performance, through DMV smog-testing stations, which could be used to regularly monitor our activity.

In any case, we also strongly urge CARB and CDFA to continue the user-fleet variance for B99 as a developmental fuel, for a number of reasons. First, the percentage of light-and-medium duty vehicles on the road is a factor of their age and longevity. As such, we obtain emissions neutrality as a group relative to the improvements in the overall number of vehicles on the road. Secondly, as mentioned above, we constitute a ready-made test bed for compliance protocol analysis. Thirdly, we represent an economic class of users that exemplify the adage, "every car on the road is a used car." We represent a case for "green" adaptive re-use, repair and recycling, as part of the car-culture of California.

In closing, we would also advise CARB to analyze the largely un-intended consequences of market-price discrepancies between B99 blend-stock and the same fuel labeled as "specialty fuel" when sold to variance user-groups, as if it were some kind of specialized, rebled "racing" fuel, when in fact, there would be little 'value added' to the fuel, other than sequestering a limited amount for consumer use.

Sincerely,

The Board of Directors and Staff of the Biodiesel Co-op of LA