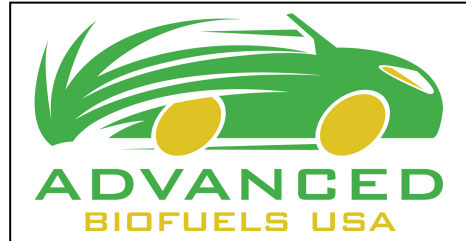


**Docket ID No. EPA-HQ-OAR-2009-0171**

**Comments at US Environmental Protection Agency's Public Hearing on the Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Clean Air Act**

**May 18, 2009**

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My name is Joanne Ivancic. I am here today as an individual and as Executive Director of Advanced Biofuels USA, a nonprofit organization dedicated to promoting the understanding, development and use of advanced biofuels.

I applaud your findings that CO<sub>2</sub> is one of the 6 key contributors to air pollution and endangers public health and safety.

I am also glad that the US Supreme Court ruled, in effect, that EPA now has the authority to regulate CO<sub>2</sub>.

I note that your findings and these hearings relate only to Section 202(a) of the Clean Air Act and address only "new motor vehicles and new motor vehicle engines."

I hope that as you refine your findings for these "new" vehicles and engines that you will not ignore in your calculations the CO<sub>2</sub> and other greenhouse gas emissions from the operation of new electric vehicles and plug-in hybrids that are being developed.

Just as the power generated to move a vehicle at its source (an engine inside a car, for example) causes air pollution, so is air pollution created, including CO<sub>2</sub> emissions, when the power to move that vehicle is generated miles away at, for example, a coal-fired power plant.

If the purpose of the Clean Air Act Section 202(a) is to get at the endangerment to health and welfare caused by pollution from new vehicles, then what comes out of the tail pipe – be it a traditional tail pipe attached directly to the vehicle or an extended tail pipe that looks like a smoke stack at a power plant— should be part of your analysis of the contribution to greenhouse gas pollution made by transportation sources subject to regulation under Section 202(a).

Looking at ALL the sources of pollution created to operate vehicles logically includes looking at the source of generation of electricity for electrical and plug-in hybrid cars.

In the spirit of other greenhouse gas emissions analysis being considered by EPA, particularly in regard to GHGs created incident to the production of transportation fuels, it is conceivable that your analysis should take the "mine to wheel," "well to wheel," or "seed to wheel" approach to determining exactly

what the CO2 “footprint” is for operating these new vehicles and new engines. AND it should include the CO2 pollution created during the production of vehicles, including storage batteries that are essential to the operation and performance of these innovative electric vehicles.

It is my hope that your attention to these transportation and climate change problems will spur significant investment in the development of sustainable renewable advanced “designer” fuels congruent and cooperatively with the development of new vehicle engines and power generation which could move us and our vehicles as efficiently and cleanly as possible.