



October 24, 2014

Alexander "Lex" Mitchell  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

RE: Alternative Diesel Fuel (ADF) Rulemaking Workshop 10.20.14

Dear Mr. Mitchell:

I am submitting this letter regarding your agency's October 20<sup>th</sup>, 2014 ADF Rulemaking Workshop on behalf of the California Biodiesel Alliance (CBA). I would first like to state our support for the comments of the National Biodiesel Board on this workshop. Also, I wish to urge your close consideration of related letters of comment from individual CBA members and to state strongly that a more important issue has never faced California's biodiesel industry.

CBA, California's biodiesel industry trade association, was started by a handful of businesses in 2006 and now represent over 50 stakeholders, including feedstock suppliers, distributors, retailers and all of the state's biodiesel producers.

Our members are environmental professionals dedicated to providing biodiesel as a solution to many problems, especially petroleum diesel's emissions profile, which includes the well-known toxics, particulates, and carcinogens that cause unacceptable levels of disease, especially in our state's children and its most vulnerable communities. In addition, our industry brings biodiesel's significant GHG-lowering properties as a key component of the states' bellwether carbon reduction programs, which the world is looking to as a model for addressing the dire realities of climate change.

In representing our members, CBA works almost exclusively toward the goal of achieving the highest possible degree of regulatory certainty as a prerequisite to our industry's ability to grow and continue to bring good, family-supporting green jobs to California. A 2013 survey of CBA members showed that with a scenario of government policy and economic factors at a medium level of desirability instate production could reach 71 million gallons in 2015 (more than double 2013 volumes) and up to 188.6 million gallons by 2020.

Toward this end, we work at the federal level to secure increased RVOs for biodiesel under RFS and have a special focus on protecting the interest of biodiesel in the LCFS re-adoption process. However, our biggest investment to date has been working with your agency (for close to 10 years) on this rulemaking — a regulation that is fundamental to keeping this sector of California's green businesses alive.

We very much appreciate your agency's stated goal in the presentation for this workshop of maintaining a vital biodiesel industry and are heartened to learn of your recognition of the significant reductions of directly emitted PM, especially per this sentence: "Biodiesel blends reduce PM emissions and the associated risks."



We would like to go on record in support of a significance level of B20, a level at which biodiesel has been shown, in studies previously presented to the Air Resources Board, to have a self-mitigating emission profile due to the 50 percent or greater decreases in all other pollutants needed for ozone formation (PM and hydrocarbons).

However, at the minimum, to assure that our industry is able to continue serving its public and private customers, and in hopes of growing and providing more of biodiesel's benefits, we are requesting your consideration of the following:

- A phase-in period of at least 3 years to allow for the significance changes associated with compliance.
- B10 all year-round. This is necessary for the growth of our industry and as a means to ensure the availability of low CI fuels in the state.
- A process for specific exemptions based on the health benefits of biodiesel. For example, a school system that wants to use B20 (or public fleets that serve vulnerable citizens per the above paragraph regarding diesel fuel's disease-causing emissions profile).
- Exemptions for fleets that use 80% NTDEs and exemptions for light and medium duty fleets.
- An NTDE provision that sunsets at a lower threshold.
- Biodiesel producers should be allowed the option of using either a cetane test or a Celsius cloud point test for purposes of regulatory compliance.
- Recognition that biodiesel and renewable diesel are both needed and should be optimized. (While renewable diesel is a valuable product, it does not have biodiesel's emissions reductions and benefits for PM, VOCs, and hydrocarbons.)

Thank you for this opportunity to comment. We hope you will seriously consider our suggestions, and please let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Curtis Wright".

Curtis Wright  
Chairman  
California Biodiesel Alliance