March 4, 2022

Chair Liane Randolph
California Air Resources Board
1001 I Street, Sacramento, CA 95814
P.O. Box 2815, Sacramento, CA 95812

SUBJECT: 2022 State SIP Strategy

Dear Honorable Chair Randolph,

We wanted to start by thanking CARB staff for their work on the draft 2022 State Strategy for the State Implementation Plan. As the SIP Strategy is being developed to identify the control measures and emissions reductions necessary to support attainment of the federal 70-parts-per-billion (ppb) eight-hour ozone standard across California, as well as other national and state ambient air quality standards, we wanted to reiterate the importance of looking at a broad set of strategies.

The Healthy Air Alliance believes that all people deserve the right to clean air. However, zones that are currently not meeting attainment levels are the same areas in our state where residents disproportionately suffer from environmentally linked diseases, like asthma and cancer.

CARB cannot afford to leave any stone unturned in the push to minimize tailpipe emissions from internal combustion engines. We should use all available mobile technologies to improve air quality in the transportation sector as soon as possible. That is why we ask that the 2022 SIP Strategy includes making readily available options – such as biodiesel, renewable diesel, renewable natural gas (RNG), E15, and E85 – more available for passenger vehicles. Reliable scientific research data that CARB has reviewed proves these alternatives to fossil fuels have measurably improved air quality.

To achieve better health outcomes, direct emissions should always be prioritized, and we must adopt policies that will immediately reduce the volume of toxic additives in our fuel supply while driving progress toward ambitious climate goals.

Most of the fuels that would satisfy this demand – while achieving the 2045 carbon neutrality target – rely on technology that has not been commercialized yet. We believe this is something that needs to be taken into greater consideration, especially in addressing the air pollution that will continue to accumulate during the transition to zero-emissions vehicles (ZEVs), starting now until that transition is complete in decades to come.

As the state begins phasing out new gasoline-powered car sales by 2035, low- and middle-income drivers will continue to have less access to expensive new cars. Rather, they will continue driving and purchasing used, fossil fuel-powered vehicles. This runs the risk of deepening the divide among the “two California’s” – and will not serve the interests of environmental justice.

There have been numerous studies on carbon neutrality, which is an all-of-the-above strategy of zero-emission, near-zero emissions, carbon capture, and emission reduction and avoidance strategies. Two such studies are available from the University of California (UC) Institute of Transportation Studies on the demand-side and UC Santa Barbara on the supply-side.

UC academics used real-world data to crunch the numbers and found that while pushing for more investment and quicker implementation of zero-emission solutions, regulators cannot ignore the air pollution that remains and how we tackle that delta. Specifically, they found that there is a significant demand for gasoline through 2045, in excess of 2 billion gallons per year, and significant growth in low-carbon liquid fuels compatible with internal combustion engine vehicles (ICEVs) is still essential to

meeting the residual demand. And that while ZEVs dominate the fleet in 2045, there is still a substantial pool of ICEVs, which will continue to demand liquid fuels. The studies found that ICEVs – along with aircraft, marine engines, backup power generation, and other unusual use cases – will maintain demand for several billion gallons per year of low-carbon liquid or gaseous fuels capable of achieving very low carbon intensities by 2045, roughly defined as 5 g CO2e per megajoule or less.

Reducing the carbon intensity of all fuel is a critical element to achieving these goals, and actions taken under Low-Carbon Fuel Standard (LCFS) have been shown to reduce millions of tons of carbon emissions. Liquid biofuels were responsible for 77% of total greenhouse reductions between 2011 and 2020. These same alternatives actively displace petroleum-based toxins in the fuel supply. California must rely on well-established and proven direct emissions reductions strategies.

Innovation is as key to getting to carbon neutrality by 2045, and so we ask staff to take a broad approach and consider zero-emission, near-zero emissions, carbon capture, and emission reduction and avoidance strategies when finalizing the 2022 State Strategy for the State Implementation Plan.

Sincerely,

Jim Kennedy
Executive Director, Healthy Air Alliance