August 2, 2022

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

SUBJECT: July 7 Public Workshop to Discuss Potential Changes to the Low Carbon Fuel Standard

Dear Chair Randolph,

We would like to start by thanking you and the California Air Resources Board (CARB) staff for conducting the July 7 public workshop to discuss changes to the Low Carbon Fuel Standard (LCFS). The Healthy Air Alliance understands changes to the LCFS will need to align with the 2022 Scoping Plan. The ambitious goals of the preferred Alternative 3 will need an even greater amount of innovation from the LCFS regulatory framework to drive increases in alternative fuel supply and infrastructure investments.

The Healthy Air Alliance champions the right of all people to have access to clean air. As stated in our June 23 public comment letter on the 2022 Scoping Plan, we believe this is only made possible by adopting a broad set of tools and strategies rather than limiting ourselves to zero-only solutions which will take decades to be fully materialized. Measurable reductions in air pollution using low-carbon fuels under the LCFS needs a quicker implementation timeframe. We believe that direct emissions reductions must always be prioritized, and we urge CARB staff to follow science and public health, not what is considered politically feasible.

California must rely on well-established and proven direct emissions reduction strategies. As acknowledged in the Draft Scoping Plan's Proposed Scenario, biofuels play a crucial role in reducing emsissions. Two recent studies – one from UC Santa Barbara and the other from the University of California Institute of Transportation Studies (ITS) – both point to the need to front-load biofuels in larger qualities in order to achieve carbon neutrality. We support pursuing emerging and innovative zero-emissions technologies, while also using the tools and resources already available to further reduce emissions as soon as possible. This includes biofuel blends like E15, which have been shown to have a statistically significant decrease in certain emissions – such as ethylbenzene and weighted solid particulate matter – when compared to E10. CARB recently published a Multimedia Evaluation of E11-E15 Tier 1 Report which found that E15 blends do not increase vehicle exhaust emissions compared to E10. Another recent Department of Energy (DOE) study found that U.S. corn ethanol has 44 to 52 percent lower GHG emissions than gasoline.

Tailpipe emissions are the largest contributors to poor air quality in our state, and while data has shown that the majority of Californians live with unhealthy air, the problem is worse in under-resourced communities and communities of color. This poor air quality leads to adverse health outcomes, further exacerbating the historical disadvantages that these communities have had to overcome. While zero-emission vehicles, renewable hydrogen and electric transportation should absolutely be a part of the solution, CARB 2020 Mobile Source Strategy studies have shown that merely accelerating zero-emission solutions will not suffice. We encourage CARB to ensure

the LCFS will utilize every available tool to immediately curb air pollution for all communities. This restores the balance with the critical need to prioritize health-driven action of displacing fossil fuels with existing solutions while adopting technology-focused solutions.

Additionally, focusing only on zero-only solutions is not economically feasible for lower-income communities that are disproportionately impacted by unhealthy air. This divide is only growing as the cost of living is increasing and Californians are facing a lack of affordable fueling options. We must ensure that we prioritize an equitable transition that does not leave vulnerable and under-resourced communities behind.

During the June 23 meeting on the 2022 Scoping Plan, questions about the environmental impact of crop-based biofuels were discussed. Historically, one of the largest risks surrounding the use of crop-based biofuels was the potential land use impacts associated with placing new land under cultivation. These land use impacts were a result of previous studies that looked at the life cycle analysis, or LCA, of the production of ethanol and found significant land use impacts. However, a recent report issued by Argonne National Laboratory, a U.S. Department of Energy multidisciplinary science and engineering research center, tells a different story. The report by Argonne found that research pointing to significant land use impacts relied on “outdated and inaccurate projections” that resulted in “overestimated GHG emissions.”

Argonne also looked at corn ethanol production from 2005 to 2019, a period in which U.S. corn ethanol production quadrupled, and found that the carbon intensity (CI) of producing ethanol dropped by over 20 percent. This is largely due to ongoing agricultural advancements. Argonne estimates that these advancements have the ability to further lower GHG emissions from approximately 40 percent today to over 70 percent as compared to a petroleum baseline.

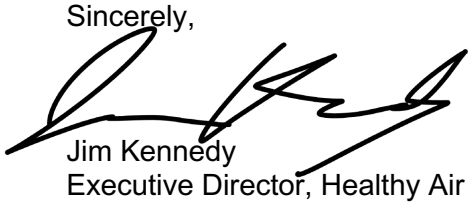
Knowing that the environmental impacts associated with ethanol continue to improve, we feel that a cap on biofuels within California’s LCFS would only limit future efforts to control GHG emissions. We should not impose arbitrary caps on available solutions, like conventional ethanol and other renewable fuels types, when we need to explore every path to achieve our climate goals.

Public health impacts should also be a primary consideration when evaluating the pathway to carbon neutrality. Related reductions in particulate matter and reduced reliance on toxic benzene, toluene, ethylbenzene and xylene (BTEX) fuel additives could yield significant community health benefits. BTEX components have been linked to serious health issues at levels well below Environmental Protection Agency (EPA) standards and research indicates that even a small reduction in key pollutants can save lives.

Now is the time to utilize all available technologies, such as renewable diesel, renewable natural gas (RNG), biodiesel, E15 and E85, to cut emissions and fuel prices for California’s most vulnerable communities. We need to deploy every tool at our disposal to make measurable improvements to the air quality across our state.

The Healthy Air Alliance urges CARB to update the LCFS changes using current scientific data on proven GHG reductions from biofuels and other tools to benefit all California communities and our environment.

Sincerely,



Jim Kennedy
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