



February 17, 2015

Chairman Mary Nichols
California Air Resources Board
1001 I Street
Sacramento, CA
95814

RE: Support for Alternative Diesel Fuel proposal

Dear Chairman Nichols:

On behalf of the undersigned organizations, we write in support of the California Air Resources Board's (CARB) proposed Alternative Diesel Fuel (ADF) regulation. We believe that the proposal successfully balances the need to encourage and incentivize alternatives to fossil fuels with the need to ensure that no additional harms are caused by these alternatives.

Because of the potential for biodiesel to increase smog-forming NO_x emissions under certain formulations, engine models and operating conditions, we support the ADF pathway set forward by CARB staff. While advanced engine technologies will mitigate NO_x issues with biodiesel, there is a need for near term mitigation to address biodiesel use in existing diesel engines. Fortunately, the proposed ADF regulation includes strategies to maximize the benefits of biodiesel, including offering exemptions for biodiesel fueling stations or fleets using technologies that control NO_x emissions. We strongly support this approach and encourage CARB to explore additional opportunities to capture NO_x-neutral and NO_x-reducing particulate and carbon pollution benefits. Even with this regulation, it will be important for CARB to continue monitoring biodiesel NO_x impacts to ensure control measures are working as intended to support clean air strategies.

Taken together with the Low Carbon Fuel Standard, the ADF will help to avoid nearly 100 deaths per year as cleaner alternatives to petroleum diesel are utilized in California. The air pollution and public health impacts of petroleum fuels are well-documented and must continue to be addressed through strong regulations that cut petroleum's impacts on lung health and our climate. We believe that the ADF is an important step in the process of curbing harmful pollutants and protecting the health of future generations of Californians.

Thank you for your work to continue to implement the Low Carbon Fuel Standard and to address the potential for NO_x impacts of alternatives to diesel fuels.

Sincerely,

Will Barrett
Senior Policy Analyst
American Lung Association in California

John Shears
Research Coordinator
The Center for Energy Efficiency and Renewable Technologies

Bill Magavern
Policy Director
Coalition for Clean Air

Tim O'Connor
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