



November 5, 2021

Mr. Joshua Cunningham
Chief, Advanced Clean Cars Branch
California Air Resources Board
1001 I St
Sacramento, CA 95814

Re: Renewable Fuels Association Comments on the October 13, 2021, Advanced Clean Cars II Workshop

Dear Mr. Cunningham,

The Renewable Fuels Association (RFA) thanks you for the opportunity to comment on CARB's October 13, 2021, Advanced Clean Cars II Workshop. These comments should be considered in conjunction with the comments submitted by RFA following the August 11, 2021, ACC II Workshop.

The RFA is the leading national trade association representing U.S. fuel ethanol producers. Its mission is to advance the development, production, and use of low-carbon fuel ethanol by strengthening America's ethanol industry and raising awareness about the benefits of renewable fuels. Founded in 1981, RFA serves as the premier forum for industry leaders and supporters to discuss ethanol policy, regulation, and technical issues. RFA's 300-plus members are working daily to help America become cleaner, safer, more energy secure, and economically vibrant.

In response to our online question at the latest workshop regarding a potential Flex Fuel Vehicle (FFV) requirement, CARB staff recognized the benefits of low to zero carbon ethanol, FFVs and the need for multiple strategies, but stated that FFVs were outside of the scope of the current rulemaking. An FFV strategy that results in maximizing the amount of GHG reductions at the lowest cost while also reducing tailpipe emissions is certainly within the scope of a regulatory process focused on a ZEV requirement intended to reduce GHG and tailpipe emissions. FFVs running on 100% renewable low to zero carbon fuel is equivalent to the GHG benefits of battery electric vehicles and at a lower cost of the vehicle.

The second part of the response was that more broadly speaking, the Scoping Plan is focused on electrification. The Scoping Plan is designed to lay out a longer-term strategy for achieving California's aggressive climate goals with a new objective of carbon neutrality by 2045. The ITS report prepared for the Scoping Plan development clearly points to the need for much larger volumes of low to zero carbon liquid fuels to achieve carbon neutrality by 2045. Allowing for greater access to the vehicle gasoline tank for low to zero carbon renewable fuels through an FFV requirement on new vehicles is a clear path for achieving this goal. Electrification alone is not sufficient and multiple strategies should be employed.

It is also important to note that the 2022 Scoping Plan is still in development and the RFA has provided multiple comment letters in that process in support of a focus on a realistic, feasible and cost-effective strategy that includes affordable, low to zero carbon renewable fuels. Additionally, the 2017 Scoping Plan in place today includes a statement regarding the need to"rapidly reduce carbon intensity of existing liquid and gaseous transportation fuels...." Including an element in the ACC II rulemaking to require FFVs starting model year 2026 is both within the legal framework of the ACC II program and the existing Scoping Plan.

Another focus of the ACC II rulemaking should be achieving the greatest reduction in GHG emissions starting as soon as possible. The most recent UN IPCC report made it alarmingly clear the imperative of further reducing GHG emissions immediately. The cumulative impacts of not reducing GHG emissions as soon as possible can be catastrophic. Ethanol blended into California gasoline at ten percent blends has delivered the single largest (35%) source of GHG reductions under the LCFS since its inception in 2011.

Higher blends of low carbon ethanol in the current gasoline pool represent the nearest term and most affordable path for greater and immediate reductions of GHG emissions from the light duty fleet. Requiring that all light duty IC engines sold in California be FFVs will enable the legacy fleet of vehicles to be capable of running on low to zero carbon ethanol over their useful life. Additionally, employing the sale and use of FFV PHEV vehicles powered by renewable electricity and renewable liquid fuels under future ZEV requirements will sustain the GHG reductions from this practical and affordable option for California consumers.

We appreciate the leadership of California on carbon policy and look forward to continued collaboration with CARB on the development of the ACC II regulation.

Sincerely,

Kelly Davis
VP of Regulatory Affairs