May 30, 2022

California Air Resources Board

1001 I Street

Sacramento, CA 95814

RE: CARB Proposed Advanced Clean Cars II Regulations – OPPOSE;

Dear CARB,

Thank you for the opportunity to make a written comment on the CARB Proposed Advanced Clean Cars II Regulations. I am writing this letter in OPPOSITION to the Proposed Advanced Clean Cars II Regulations and include my comments in opposition to the overall CARB 2022 Scoping Plan Update dated May 10, 2022 that is being reviewed for future adoption after the appropriate periods of comment as required by regulations.

With these proposals CARB is on track to adopt major regulations over the next few months that have the potential to drive businesses out of California, result in job losses, increase the cost of living, and spiked energy prices.  
  
I am part of the larger business community that has deep concerns with CARB's proposed 2022 Climate Change Scoping Plan of which the Advanced Clean Cars II Regulations are part of. The result of the adoption of these regulations will have far reaching impacts upon on all Californians, dictating how they must run their businesses, what cars they can drive, where they can live, and what stove they can cook with. Life as we know it in California will be altered going forward.  
  
Some of the major implications for businesses and individuals in California, include:  
• Increasing costs to businesses, especially agricultural and transportation sectors.  
• Employment/Jobs – despite a growing population, these policies will cost California over 85,000 jobs.  
• Higher utility costs disproportionately impacting inland and rural communities.  
• Eliminating consumer choice by mandating electric vehicles, appliances, residential, and commercial buildings.  
• Worsening our electric grid reliability by pushing electrification without infrastructure in place, thus increasing the likelihood power outages

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I believe these implications cannot be overstated and in support of this I refer to the following opening statements in the CARB Draft 2022 Scoping Plan Update dated May 10, 2022 and its Executive Summary (Note the draft summary is 277 pages long). I have highlighted the statements that I believe point to the lack of a comprehensive energy and climate policy that should include ALL the best technologies and best practices available now and, in the future, and to consider that there will be improvements to our existing technologies that will make them very viable as part of a truly comprehensive solution that can realistically be sustained. I remind my fellow Californians that the fossil fuel industry is part of the energy solution that has made the United States of America the greatest nation in the world and one that I believe we all take for granted. This industry has required huge amounts of investment capital and manpower to build and sustain.

Any consideration of change in energy policy of this magnitude must include an “ALL available technologies” and “best practices” approach as well as a thorough evaluation and consideration of national security implications.

Executive Summary

The 2022 Scoping Plan, once final, will be a major milestone, laying out how the fifth largest economy in the world can get to carbon neutrality by 2045 or earlier. This is the first Scoping Plan that adds carbon neutrality as a science-based guide and touchstone beyond statutorily established emission reduction targets. It identifies a technologically feasible, cost-effective and equity-focused path to achieve carbon neutrality by 2045, or earlier, while also assessing the progress the state is making toward reducing its greenhouse gas (GHG) emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.1 Previous plans focused on specific GHG reduction targets for our industrial, energy, and transportation sectors—to meet 1990 levels by 2020, and then the more aggressive 40 percent below that for the 2030 target. Carbon neutrality takes it one step further by expanding actions to capture and store carbon including through natural and working lands and mechanical technologies, while drastically reducing anthropogenic sources of carbon pollution at the same time. What this means for California is an ambitious and aggressive approach to squeezing the carbon out of every sector of the economy, setting us on course for a more equitable and sustainable future in the face of the greatest existential threat we face, and ensuring that those who benefit from this transformation include those communities now hardest hit by the ongoing use of fossil fuels. The combustion of these fuels has polluted our air, particularly in low-income communities and communities of color, for far too long, and is the root cause of climate change. This Draft Scoping Plan helps us chart the path to a future where race is no longer a predictor of disproportionate burdens from harmful air pollution and climate impacts.

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The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place here for a decade and a half. That means rapidly moving to zero-emission transportation, electrifying the cars, buses, trains, and trucks that now constitute California’s single largest source of planet-warming pollution. It also means phasing out the use of fossil gas used for heating our homes and buildings. It means clamping down on chemicals and refrigerants that are thousands of times more powerful at trapping heat than carbon dioxide (CO2). It means providing our communities with sustainable options for walking, biking, and public transit so that people do not have to rely on a car. It means continuing to build out the solar arrays, wind turbine capacity, and other resources that provide clean, renewable energy to displace fossil-fuel fired electrical generation. It also means scaling up new options such as green hydrogen2 for hard to electrify end uses and renewable gas where needed.

It seems to me in reading this proposal that the “electric vehicle” has been christened the industry of choice to succeed the fossil fuel powered internal combustion engine. Many of the statements of facts I believe are very subjective and would ask if we have indeed considered all the costs of moving to this scenario as outlined in the draft proposal? California is currently and for some time now unable to provide for and sustain its own electrical grid. I remind my fellow citizens that electricy must be produced and generated by another source or many sources. Many of these sources are under attack because they do not meet the current thinking of “the science.” Again I would submit we need to use ALL of the resources that we have at our disposal to generate the energy that a growing and prosperous state needs.

Have we really considered the actual cost of this unprecedented approach? “an ambitious and aggressive approach to squeezing the carbon out of every sector of the economy, setting us on course for a more equitable and sustainable future in the face of the greatest existential threat we face, and ensuring that those who benefit from this transformation include those communities now hardest hit by the ongoing use of fossil fuels.”

Who decided this is the greatest existential threat we face? California will be impacted by the almost complete removal of fossil fuels as one of the main providers of energy for our state if it is not done carefully and with a more thoughtful approach. I believe the fossil fuel industry is meeting the challenge to produce new products that will meet the requirements of a more clean energy. We do not need to throw out this technology and form of energy to succeed in our goals for a prosperous and clean California.

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Has the true life-cycle of CO2 emissions really been calculated properly?

1. Vehicle production which includes CO2 emissions released during all vehicle stages of production processes.
   1. This would include the extraction of raw materials and include the final vehicle assembly.
   2. Where will we get the raw materials from? This has national security implications.
   3. This includes the production of the truck and the large lithium-ion battery.
2. Energy production and consumption which includes CO2 emissions released during the production of energy (e.g. the production of electricity at a power plant, or the refining of diesel fuel or gasoline from crude oil).
   1. This would include the CO2 emissions from fuel consumption of the internal combustion engine.
3. Vehicle disposal and recycling which includes emissions related to the disposal of or recycling of the truck and all its related parts which would include the recycling of any lithium-ion batteries or other technologies to power the vehicle.
   1. Is there a method to completely recycle a lithium-ion battery now or will some of this end up in a landfill? Good question.

You have been appointed as the gatekeepers for these regulations but you serve every Californian which means you have a huge responsibility to get this correct and look thoroughly at every aspect, not to pick winners and losers. I respectfully request you give careful consideration to the issues I have raised in my comments. We look forward to a prosperous California in which all stakeholders are fairly represented and all technologies are given an equitable opportunity to participate in the marketplace of ideas and commerce.

Thank you for your consideration.

Respectfully,

Jeffrey M. Roe

President

Cc:file