



November 15, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: CABA and NBB Comment Letter – Harbor Craft Regulation

The California Advanced Biofuels Alliance (CABA) and the National Biodiesel Board (NBB) appreciate the opportunity to comment on the Harbor Craft Regulation. While we applaud amending the regulation to include renewable fuels, we believe other drop-in fuel replacements, such as renewable diesel and biodiesel blends, should be an available alternative in the regulation.

CABA is a not-for-profit trade association promoting the increased use and production of advanced biofuels in California. CABA has represented biomass-based diesel (BMBD) feedstock suppliers, producers, distributors, retailers, and fleets on state and federal legislative and regulatory issues since 2006. The NBB is the U.S. trade association representing the entire biodiesel and renewable diesel value chain, including producers, feedstock suppliers and fuel distributors. As a drop-in fuel replacement for petroleum diesel, biodiesel and renewable diesel can help California achieve its carbon neutrality goals.

While both fuels provide significant benefits on their own, blending the fuels together maximizes both the environmental and economic profiles of biodiesel and renewable diesel.

A California Air Resources Board (CARB) approved fuel¹, renewable diesel and biodiesel blends comprised of up to 20% biodiesel and 80% renewable diesel (R80/B20) will reduce emissions, perform higher and provide supply and cost benefits to California communities.

Compared to petroleum diesel, R80/B20 can not only reduce nitrogen oxides (NOx) by 10%, but also reduces total hydrocarbons (THC) by more than 20%, particulate matter (PM) by more than 40% and carbon monoxide (CO) by more than 25%.² The full suite of benefits provided by R80/B20 blends only enhances the emissions reductions renewable diesel and biodiesel can provide alone. As CARB is aware, PM has significant adverse impacts on human health, disproportionately so in disadvantaged/ environmental communities (DACs). Because biodiesel reduces PM substantially more than renewable diesel³, an important goal for the CHC regulation should be to maximize the amount of biodiesel used by commercial harbor craft while balancing the need for reducing other pollutants, such as NOx. This is especially critical for maximizing the regulation's health benefits to local DACs, many of which are sited

¹ https://ww2.arb.ca.gov/sites/default/files/2021-07/ADF_Regulation_5-3-21.pdf

² https://www.regi.com/docs/default-source/products/reg-18043_ultra_clean_diesel_fact_sheet_updated_2.pdf?sfvrsn=bcba8d1a_2

³ See Executive Summary, CARB Final Report, "Biodiesel Characterization and NOx Mitigation Study," Oct. 2011, https://www.arb.ca.gov/fuels/diesel/altdiesel/20111013_carb%20final%20biodiesel%20report.pdf.



near California ports or are otherwise subjected to emissions from coastal operations of harbor craft. A R80/B20 blend achieves this optimal balance of GHG, PM and NOx reductions while reducing costs for fleet operators.

Because renewable diesel offers increased cetane and biodiesel offers increased lubricity, blends of renewable diesel and biodiesel can increase engine life with better self-ignition and smoother-running engines.

While emissions benefits and engine performance are significant on their own, supply and price are at the forefront of consumer concerns. As the supply of renewable diesel is growing, biodiesel is currently available to help ease any supply concerns. Blending biodiesel into renewable diesel will also decrease the cost of renewable diesel alone, easing consumer concerns of availability and cost.⁴

There is no single solution to help California achieve its ambitious goals. Allowing blend alternatives (e.g. R80/B20), as well as R100 in the Harbor Craft Regulation, will help California achieve emission benefits immediately while the state pursues its decarbonization efforts, enhance local air quality in disadvantaged and EJ communities near ports and waterways, and ease any potential cost and supply concerns. We ask that such blends be incorporated into the amendments through a 15-day rulemaking public process. This will also provide an opportunity to clarify and correct the technical basis for this rulemaking; it appears that the proposed amendments excluding the use of biodiesel are premised on inaccurate information regarding biodiesel, and we would be happy to work with CARB staff to correct the rulemaking record.⁵

We thank CARB staff for their work on this important matter and look forward to collaborating with you. Please feel free to contact us if any questions should arise.

Sincerely,

A handwritten signature in black ink, appearing to read "Trent Trawick".

Trent Trawick
Chair
California Advanced Biofuels Alliance

A handwritten signature in blue ink, appearing to read "Floyd Vergara".

Floyd Vergara
Director of State Governmental Affairs
National Biodiesel Board

⁴ <https://afdc.energy.gov/fuels/prices.html>

⁵ See e.g., Appendix E of the Staff Report (at E-53), citing the 15-year old National Renewable Energy Laboratory's "Biodiesel Handling and Use Guide (Third Edition, 2006)," as a key basis for contamination, usage, storage and other issues raised in the Staff Report. The Third Edition has long been superseded by the Fifth Edition (2016) of that guide. Indeed, CARB's own 2015 Biodiesel Multimedia Evaluation found significant GHG, air quality, and environmental benefits and no significant adverse impacts from the use of biodiesel, including impacts to air and water quality. See <https://ww3.arb.ca.gov/fuels/multimedia/meetings/revisebiodieselstaffreport.pdf> at 16.