January 6, 2022

Hello,

My name is Kimberlee Stryker. I am a Climate Reality Project Leader with training by Vice President Al Gore in 2018.

I’m grateful to CARB for including public comment on the matter of future Biofuels Policy, something I have spent time researching. I am becoming more concerned about the direction CARB is moving in to promote and solidify the use of biofuels in California’s future – and thus in the future of many other states and nations who follow California’s direction.

Biofuels are not a solution to California’s transit energy needs, at least not the solution that is currently being promoted. Nor is it a bridge to the future. It is a delay to making the necessary steps to transition from fossil fuels to electrification. Research indicates that biofuels, except for those using only true waste stock, offer limited or no improvement in carbon reduction than fossil fuels. At best they offer 4 – 5% reduction in carbon emissions.

According to internationally reputable non profit research tank on clean transportation - Internaional Council on Clean Transportation (ICCT) – biofuel feedstock that are actual wastes from the agricultural and forestry sectors are good and appropriate feedstock materials. Others, such as soy and other crops that are grown for biodiesel have important negative impacts on global food markets and food insecure communities. Depending on price fluxuations of crops, impacts on critical rain forests occur as investors move into rainforest lands to create agricultural lands to grow biofuel crops. Biofuel production is inextricably intertwined with land use politics and economics, and ultimately with negative climate change impacts. CARB has relied on the expertise and research of ICCT in the past. I hope it will continue to do so related to biofuels.

Please see these peer-reviewed articles by ICCT:

- <https://theicct.org/publications/race-to-zero-ze-hdv-eu-dec21>

- <https://theicct.org/publications/us-biodiesel-impacts-mar2021>

- <https://theicct.org/publications/how-rapeseed-and-soy-biodiesel-drive-oil-palm-expansion>

In addition, Senior Fellow Tim Searchinger of Princeton University for the Center of Policy Research on Energy and the Environment and the World Resources Institute is also sounding the alarm away from biofuels as a solution to fossil-based transit fuels. In a personal interview recently he asked the question, “How much of the planet’s existing agricultural land will be needed to create biofuels for our aviation sector?” He then answered his own question: “ ALL of it.”

Please see these peer-reviewed papers by Searchinger and colleagues:

* <https://www.wri.org/insights/5-things-know-about-ieas-roadmap-net-zero-2050>
* <https://scholar.princeton.edu/tsearchi/publications/do-biofuel-policies-seek-cut-emissions-cutting-food>

I ask that CARB limit rather than advance the use of biofuels in California. CARB has a critical role in the future of our State, indeed our planet. It needs to put its efforts into electrifying our public transit and heavy truck transit fleets. Three important focal points would advance this goal – which is also CARB’s goal:

1. Emphasize electric buses and ferries and cut through the red tape necessary to see this sector transition as soon as possible. Focus on recharging stations, legal issues with PGE, and stop incentivizing the purchase of diesel buses.
2. Put a cap on the amount of biodiesel allowed to be produced in California, even if it is exported. The EU caps the amount of biodiesel production and limits its role to around 7% of the total amount of “clean” energy produced in the European Union. This curtails biodiesel from becoming an outsized player that creates dependency and delays the move to electrification.
3. Take a closer look at some of what the EU is doing to electrify its trucking fleet. They are leaps and bounds ahead of the U.S. and if California wants to continue to be an innovator in issues related to climate change, it needs to be far more innovative than its growing reliance on biodiesel.

Thank you for your time.

Kimberlee Stryker

San Francisco.