



January 26, 2021

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: CABA and NBB Comments on the Proposed Amendments to the Alternative Diesel Fuels Regulation**

Dear Chair Randolph and Members of the Board:

Thank you for the opportunity to comment on the proposed modifications, released January 12, 2021, to the Alternative Diesel Fuels (ADF) regulation. The California Advanced Biofuels Alliance (CABA) and the National Biodiesel Board (NBB) thank you for extending the phase out date for currently certified NOx additives and formulations from April 1, 2021 to August 1, 2021. While we appreciate that extension, we still oppose a number of the changes contained in the October 14, 2020 proposed modifications since our significant concerns with those changes remain unresolved.

In its April 2020 hearing, the Board directed staff to engage stakeholders to develop a workable and simplified certification process in response to the serious concerns raised by CABA, NBB, and a number of its members, as well as other stakeholders. The Board's direction was clearly aimed at simplifying the certification process, along with addressing a number of other issues. Instead, the proposed modifications released in October 2020 further complicated the already-convoluted certification procedure.<sup>1</sup> In order to address our concerns with the previous modifications, we ask that CARB withdraw the proposed January 12, 2021 modifications so that staff can work further with stakeholders to develop a workable certification procedure and address the other issues we raised previously. As we discussed in detail in our previous comments, CABA and NBB continue to recommend that CARB:

1. Revise the proposed changes to replace the screening procedure with a simplified, single-lab/engine/fuel standardized certification procedure that can be applied by anyone seeking certification for their blend/formulation, particularly for blends and formulations for which CARB had not previously identified any issues.
2. Simplify the Approved ADF Formulations provision by eliminating the superfluous R75/B20 language in Appendix 1, section (a)(1)(B)1. and including only the new language for R55/B20 language in section (a)(1)(B)2.
3. Eliminate the **new** 2% NOx reduction requirement in Appendix 1, Subarticle 2, section (a)(2)(F) and (G) (and any other provision where it is expressed or implied); this new requirement was never discussed or proposed in the original 45-day proposed changes, was never considered by the Board at its April 2020 hearing, and is therefore outside the scope of the rulemaking.

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<sup>1</sup> <https://ww3.arb.ca.gov/board/mt/2020/mt042320.pdf>; pg. 116



4. Work with stakeholders to develop and implement a scientifically valid, round-robin testing program to replace the recently-approved 2-lab procedure and the proposed new 3-lab screening process.

CABA and NBB promote the increased use of advanced biofuels in the state and like CARB, our goal is to displace petroleum with alternatives like our drop-in, low-carbon fuels. Unfortunately, the changes introduced into this regulation under the current rulemaking could ultimately limit the amount of biodiesel and renewable diesel used in California. As we have noted previously, biodiesel and renewable diesel have provided the lion's share (45% in 2018 and 2019) of the carbon reductions and credits in the state's Low Carbon Fuel Standard (LCFS) program. Thus, any disruption in the biodiesel and renewable diesel markets can have significant adverse impacts on California's efforts to combat climate change. Further, disruptions in biodiesel and renewable diesel volumes will adversely affect California residents, particularly vulnerable populations in the various minority and low-income disadvantaged communities around the state who benefit greatly from the immediate reductions in diesel particulate matter and other co-pollutants that biodiesel and renewable diesel provide immediately upon use.

The biomass-based diesel industry is a vital part to California's low-carbon future, and potentially significant disruptions in this industry must be avoided. We look forward to working with CARB staff to resolve these concerns and continuing our cooperative and productive relationship with CARB.

Sincerely,

A handwritten signature in blue 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