



May 31, 2022

Chair Randolph and Members of the Board
California Air Resources Board
1001 I St
Sacramento, CA 95814

Re: Renewable Fuels Association Comments on the Proposed Advanced Clear Cars II Regulation

Dear Chair Randolph,

The Renewable Fuels Association (RFA) thanks you for the opportunity to comment on the proposed Advanced Clean Cars II Regulation (ACC II) now before the Board. The RFA has been actively engaged in this rulemaking and submitted written comments at two of the rulemaking workshops.

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.

The RFA supports California's efforts to achieve carbon neutrality by 2045. The ethanol industry is doing its part by continuously reducing carbon intensities and today US ethanol production on average reduces GHG emissions by 50 percent compared to gasoline and all RFA member companies are committing to net zero carbon ethanol production no later than 2050 with many producers on pace to achieve this result well before 2050.

ACC II needs to be strengthened to lower GHG emissions for all internal combustion (IC) engines sold between 2026 and 2035, the PHEVs sold after 2035 and the remaining legacy fleet.

Liquid fuels will remain in use for decades to come and greater efforts need to be made to decarbonize these liquid fuels. The analysis in support of developing California's Draft 2022 Scoping Plan concludes that to meet the goal of carbon neutrality by 2045, larger volumes of very low and zero carbon biofuels than are consumed today will be necessary.

A critically important outcome 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 (over 30 percent) source of GHG reductions under the California LCFS since its inception in 2011.

A requirement that all new IC powered car sales from 2026 be flex fueled vehicles (FFVs) should be added to the ACC II regulation.

Higher blends of low carbon ethanol in the current and future gasoline pool represent the nearest term and most affordable path for greater and immediate reductions of GHG emissions from the light duty fleet. An FFV requirement for all IC vehicles sold from 2026 enables the future 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 the proposed ZEV requirements from 2035, will sustain the GHG reductions from this practical and affordable option for California consumers. 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

Car companies have demonstrated the ability to build mass quantities of FFV engines at a negligible incremental cost. What is not negligible is the significant GHG benefits and criteria pollutant benefits of higher ethanol blends. And as a bonus, ethanol sells at a material discount to gasoline. E85 in California has been selling recently at a price two dollars a gallon under regular gasoline. Ensuring this low-cost compliance option for lower income consumers is valuable in meeting the equity goals of the ACC II regulation. Given the feasibility, low-cost and environmental benefits of an FFV requirement, it offers a simple and compelling addition to the ACCII regulation.

We appreciate the leadership of California on carbon policy and look forward to collaborating with the CARB Board and Staff on the development of a more effective ACC II regulation.

Sincerely,

Kelly Davis
VP of Regulatory Affairs