

September 3, 2021

Via Electronic Submittal: [Comment Docket](#)

Rajinder Sahota  
Deputy Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: 2022 Scoping Plan Update – August 17, 2021, Scenario Concepts Technical Workshop**

Ms. Sahota, and the Scoping Plan development team:

The broad coalition of stakeholders signing on to this letter appreciate the opportunity to submit comments on potential greenhouse (GHG) modeling scenarios as CARB prepares for an update to the AB 32 Scoping Plan next year.

The August 17<sup>th</sup> workshop focused on the future make-up of the state's transportation sector. We believe that any climate strategy, be it Carbon Neutrality or an absolute emission reduction target, can directly benefit from the increased use of low carbon renewable fuels in combustion engines on the road today. Both liquid and gaseous renewable fuels provide immediate cost-effective GHG reductions with today's technology. In addition, the innovation, investment and commitment of the diverse renewable fuel industry is lowering the carbon intensity of tomorrow's fuels.

We support the inclusion of renewable fuels as a fundamental parameter into the GHG modeling scenarios. The use of ever-lowering CI scores for ethanol, renewable natural gas, renewable propane, biodiesel, renewable diesel, and other renewably-sourced fuels should be recognized as near-term and longer term GHG reduction strategy in both the light and heavy-duty sectors. Even under the most aggressive electrification scenarios, there will be a significant amount of conventionally powered vehicles (on- and off-road) in California for decades to come. Maximizing the displacement of traditional fuels with renewable fuels should be included as a foundational model input in the majority of scenario model runs.

The workshop asked important questions about the largest GHG emissions source in California, transportation emissions from fuels. Continued decarbonizing of those fuels should be a priority, and the renewable fuels available to the State are growing both in breadth and GHG reduction per unit of fuel. These fuels should be used whenever possible. The State's Low Carbon Fuel Standard has achieved its goal of establishing a robust universe of investment, innovation and collaboration to bring lower carbon fuels to the California market. Such a success story should be recognized as inputs to the proposed GHG modeling.

**Aemetis Inc.** - Eric McAfee  
**Alto Ingredients Inc.** - Mike Kandris  
**Calgren Renewable Fuels** - Lyle Schlyer  
**Ca Advanced Biofuels Alliance** – Rebecca Baskins  
**Ca Compost Coalition** - Evan Edgar  
**Ca Natural Gas Vehicle Coalition** - Nicole Rice  
**Clean Energy** – Ryan Kenny  
**Coalition for Renewable Natural Gas** – Sam Wade  
**Hexagon Agility** - Ashley Remillard

**Low Carbon Fuels Coalition** - Graham Noyes  
**National Biodiesel Board** – Floyd Vergara  
**Neste** – Donna Warndorf  
**NGV America** - Sherrie Merrow  
**Renewable Fuels Association** – Geoff Cooper  
**Trillium** – JP Fjeld-Hansen  
**Western Propane Gas Association** - Joy Alafia  
**World Energy** - Leeor Alpern