



May 3, 2022

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

Dear Ms. Sahota:

The Clean Fuels Alliance America (Clean Fuels)¹ and California Advanced Biofuels Alliance (CABA)² appreciate the opportunity to provide comments on the California Air Resources Board's (CARB) 2022 Scoping Plan Update - Initial Air Quality & Health Impacts and Economic Analyses, which were discussed at a workshop held on April 20, 2022 (Scoping Plan). Clean Fuels and CABA have been longtime supporters of the state's overall climate and air quality improvement goals and have collaborated frequently with CARB staff toward achieving those goals. We continue to support California's efforts to decarbonize its economy, especially the transportation sector.

Our California member producers and marketers support over 3,900 well-paying jobs in the state and about \$960 million in economic activity each year. Further, the biodiesel, renewable diesel, and sustainable aviation fuel supplied to the state by our California and national members provide nearly half (45%) of the carbon reductions under California's groundbreaking Low Carbon Fuel Standard (LCFS), growing to the point where fully a third (33.3%) of each gallon of diesel fuel consumed in the state in 2021 consisted of our industry's low-carbon fuels. Our sustainable replacements for petroleum diesel have been a major factor in driving California's continuing large scale transformation of transportation from petroleum based toward a carbon neutral system.

¹ Clean Fuels (formerly the National Biodiesel Board) is the U.S. trade association representing the entire supply chain for biodiesel, renewable diesel, and sustainable aviation fuel. The name change reflects our embrace of all the products Clean Fuels members and the U.S. industry are producing, which include biodiesel, renewable diesel, sustainable aviation fuel, and Bioheat® fuel for thermal space heating. Our members include farmers, producers, marketers, distributors, and technology providers, and many are members of environmental organizations supportive of state and local initiatives to achieve a sustainable energy future.

² California Advanced Biofuels Alliance is a not-for-profit trade association promoting the increased use and production of advanced biofuels in California. CABA represents biomass-based diesel (BMBD) feedstock suppliers, producers, distributors, retailers, and fleets on state and federal legislative and regulatory issues.

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As an initial matter, we remain concerned with the public's lack of access to the specific data, inputs, and assumptions used in all the modeling done by CARB staff and contractors. The lack of such transparency substantially impairs the ability of stakeholders to provide meaningful third-party analysis of and feedback on the modeling and results for which CARB is soliciting public input.

With that said, we are encouraged to see the CARB staff's recommended scenario moving away from the "one-size-fits-all" approaches in Alternatives 1 and 2, a move which recognizes not just the infeasibility of those approaches but also the extreme costs associated with them. Coalescing toward Alternatives 3 and 4 recognizes the many challenges involved with Alternatives 1 and 2 and provides for a more achievable and sustainable approach to carbon neutrality by 2045. Alternatives 3 and 4 represent more of a multi-faceted, "all-of-the-above" climate program that leverages mature and emerging carbon-reducing technologies and strategies to achieve even greater GHG reductions in a shorter timeframe while the state pursues deep, long-term, multi-sector electrification as quickly as possible.

We continue to strongly encourage CARB and its contractors to incorporate scenarios into either Alternative 3 or 4 that we have suggested in past comments^{3,4,5}, which would position the state toward completely displacing petroleum diesel (3.4 billion gallons) by the 2030-2035 timeframe with low carbon biodiesel and renewable diesel. Our modeling shows this is achievable through setting more stringent LCFS targets, establishing appropriate policy mechanisms to incentivize greater use of such fuels, and eliminating barriers to deeper deployment of biomass-based diesel and other low carbon fuels. For example, heavy duty vehicle fleets can now achieve 100% sustainability -- with little to no additional cost in fuel, fueling infrastructure, or engines/equipment -- through the use of biomass-based, drop-in fuel blends such as R80/B20 (80% renewable diesel, 20% biodiesel). Such a straightforward and immediately achievable step can significantly reduce GHGs, diesel PM, NOx, and other pollutants now and over the next several decades, not years or decades from now. A better mix of policies, incentives, and barrier-reduction strategies can accelerate this decarbonization of the onroad and offroad heavy duty vehicle and equipment pool, including marine and rail applications. This would be especially beneficial for environmental justice communities, many of which are located near high-diesel use sites such as ports, railyards, logistics, and freight corridors.⁶

³ See NBB and CABA joint comment letter, dated Jan. 7, 2022, at <https://www.arb.ca.gov/lists/com-attach/125-lcfs-wkshp-dec21-ws-BWsCZIY1U18LbFM9.pdf>, accessed May 3, 2022, incorporated herein by reference.

⁴ See Clean Fuels comment letter, dated March 7, 2022, at <https://www.arb.ca.gov/lists/com-attach/14-sp22-publichealth-ws-UjFcNIA0AjABaQhX.pdf>, accessed May 3, 2022, incorporated herein by reference.

⁵ See Clean Fuels and CABA joint comment letter, dated April 4, 2022, at <https://www.arb.ca.gov/lists/com-attach/60-sp22-modelresults-ws-UTJSOFYyUGIAaAIW.pdf>, accessed May 3, 2022, incorporated herein by reference.

⁶ See discussion of Trinity Study on the substantial health benefits of reducing diesel PM by switching from petroleum distillate to biomass-based diesel at multiple sites across the U.S., including four California sites, FN 4 op cit., at 4-6.

Conclusion

We applaud and support the state's efforts to aggressively address climate change, air quality, and environmental justice in a holistic manner through the Scoping Plan Update. With that said, we note a number of deficiencies and concerns with the modeling done to date. To address these, we strongly recommend CARB consider as part of its modeling the immediate, rapid, and deep deployment of biofuels, specifically biomass-based diesel fuels in the heavy duty on- and offroad sectors; make greater use of the highly successful LCFS program to achieve deeper carbon reductions in transportation fuels; and provide more transparency by making available all underlying data, assumptions, basis, and other information that form the basis for the modeling scenarios and runs.

Thank you for your consideration of these comments. We look forward to continuing our strong collaboration with California.

Sincerely,

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

Floyd Vergara, Esq., P.E.
Director of State Governmental Affairs
Clean Fuels Alliance America

A handwritten signature in black ink, appearing to read "Rebecca Baskins".

Rebecca Baskins
Executive Director
California Advanced Biofuels Alliance