July 9, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: CABA Comment Letter – 2022 Scoping Plan

The California Advanced Biofuels Alliance (CABA) appreciates the opportunity to comment on the 2022 Scoping Plan (Scoping Plan). CABA supports the comments submitted by the National Biodiesel Board (NBB) and offers the following additional comments for your consideration. Simply put, we encourage the California Air Resources Board (CARB) to focus on adopting regulations that promote the use of biodiesel and renewable diesel (collectively "biomass-based diesel") in those heavy-duty vehicles (HDV) and other applications where electrification is not yet feasible. There is no need to continue using petroleum diesel in such applications when drop-in, sustainable biomass-based diesel is available now -- in blend ratios comprising up to 100% renewable content -- for achieving significant environmental and public health benefits.

CABA is a not-for-profit trade association promoting the increased use and production of advanced biofuels in California. CABA has represented biomass-based diesel (BMBD) feedstock suppliers, producers, distributors, retailers, and fleets on state and federal legislative and regulatory issues since 2006.

As a drop-in fuel replacement for petroleum diesel, biodiesel and renewable diesel can help California achieve its carbon neutrality goals when used in the transportation and energy sectors.

According to the California Air Resources Board's Low Carbon Fuel Standards' pathways, biodiesel and renewable diesel's lowest carbon intensity (CI) scores range from 8-16 and average at 26-33[1]. Electricity's lowest CI score is 17 and averages at 24.[2] Unlike electrification, biomass-based diesel can be used widely in engines available today, immediately benefiting California.

Not only does biomass-based diesel have low carbon intensity scores, but it also provides other significant environmental and public health benefits. Relative to petroleum diesel, biomass-based diesel fuels can reduce lifecycle greenhouse gas emissions (GHG) upwards of 80%, diesel particulate matter (diesel PM) by 47% or more depending on blend levels, and carbon monoxide, polycyclic aromatic hydrocarbons (PAH), and other noxious compounds by a substantial degree.[3] Also, each gallon of

[1] LCFS Dashboard, July 2020, https://ww3.arb.ca.gov/fuels/lcfs/dashboard/dashboard.htm
[2] Lowest EER-adjusted CI, for Q3 2020, Table 2 & EER-adjusted CA grid-average CI, Table 1, https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/fuelpathways/comments/tier2/elec_update.pdf
[3] https://www.biodiesel.org/what-is-biodiesel/biodiesel-basics

biomass-based diesel consumed helps keep multiple gallons of petroleum crude oil in the ground[4], which advances the Governor's objectives for reducing California's dependence on fossil fuel by 50% by 2030 and achieving carbon neutrality by 2045.

Since widespread electrification of the long-haul medium- and heavy-duty fleet in California is not expected to happen until after 2040[5], biomass-based diesel fuels can provide immediate public health benefits and help meet important policy objectives during the intervening years while electrification ramps up in the State. These sustainable diesel replacements can provide benefits to all Californians, but particularly for those vulnerable populations in disadvantaged communities near heavy freight activities and facilities.

Because of their immediate benefits and current availability, biodiesel and renewable diesel should be used in all applications where petroleum diesel is used today. This includes on- and off-road transportation, marine applications and generators used during California's Public Safety Power Shut-offs.

Greater use of these fuels in the medium- and heavy-duty fleet would fulfill the state's need for "enhanced prioritization on short-term environmental and public health benefits in disadvantaged and vulnerable communities," as stated in Governor Newsom's 2020-21 Climate Resilience Budget Proposal. Accelerating the use of alternative, cleaner fuels will have an enormous health benefit to the Californians who have suffered from poor air quality for far too long.

In a recent study by Trinity Consultants, it was found that in the transportation sector, benefits included a potential 45% reduction in cancer risk, when heavy-duty trucks such as semis use 100% biodiesel (B100), and 203,000 fewer or lessened asthma attacks. The study also considered the economic cost of premature deaths, asthma cases, reduced activity due to poor health, and work impacted due to sick days. For example, researchers found the communities surrounding the Port of Los Angeles/Long Beach would avoid about $1.69 billion in health costs due to improved air quality in the form of reduced premature deaths and health care costs and increased productivity.[6]

In order to reach California's carbon neutrality goals and expand the use of these alternative fuels, storage and distribution infrastructure needs to be built to support market growth. These infrastructural capabilities must be available at every existing bulk fuel terminal and rack in the state, and the introduction of new renewables-focused distribution terminals are critical if this expansion is to succeed.

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[4] As a general rule, each barrel (42 gallons) of petroleum crude oil yields about 19-20 gallons of gasoline, about 11-12 gallons of diesel, and about 4 gallons of other products. See https://www.eia.gov/tools/faqs/faq.php?id=327&t=9, last accessed Feb. 20, 2020.

[5] CARB staff's own projections for electrification in the heavy-duty vehicle (HDV) sector suggests fleet penetration of electrified HDVs would not grow beyond single digits until sometime after 2040. See Appendix F, Figs. 1-5, "Staff Report: Initial Statement of Reasons," released October 22, 2019, https://ww3.arb.ca.gov/regact/2019/act2019/appf.pdf, pp. 7-9, accessed Feb. 20, 2020.

[6] https://www.biodiesel.org/docs/default-source/trinity-study/trinity-study-executive-results-summary.pdf?sfvrsn=f5c86d7d_4

Since 2011, biodiesel and renewable diesel use has grown from 14 million gallons to more than 800 million gallons in California.[7] As stated in CABA's whitepaper, "A Roadmap for Eliminating Petroleum Diesel in California by 2030," we believe the demand for BMBD and other alternative fuels will continue to grow, eliminating the need for petroleum diesel.

There is no single solution to help California achieve its ambitious goals. As the Scoping Plan progresses, the benefits of BMBD cannot be ignored. We thank CARB staff for their work on this important matter and look forward to collaborating with you. Please feel free to contact us if any questions should arise.

Sincerely,

Trent Trawick
Chair
California Advanced Biofuels Alliance

[7]Low Carbon Fuel Standard Reporting Tool Quarterly Summaries.
https://ww3.arb.ca.gov/fuels/lcfs/lrtqsummaries.htm