



July 9, 2021

The Honorable Liane M. Randolph, Chair
California Air Resource Board
P.O. Box 2815
Sacramento, CA 95814

SUBMITTED VIA EMAIL

Re: 2022 Scoping Plan Update

Dear Chair Randolph:

Thank you for the opportunity to comment on the 2022 Scoping Plan Update, the focus of which “will assess the progress towards achieving greenhouse gas emission (GHG) reductions by 2030 and lays out a path to achieve carbon neutrality by mid-century.” The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of the plan and the policies and procedures that may emerge as a result of these discussions. We firmly believe that any viable scenario to achieve Carbon Neutrality by 2045 must include renewable and carbon negative fuels. Please consider the following:

The Scoping Plan must focus on climate change per state law and the top priority should be meeting statutory requirements to reduce climate pollution. Nothing can do this more effectively than renewable fuels because of their low carbon intensities and reductions in black carbon.

We encourage CARB to:

- Review the Ramboll study and disclose specific details on any challenges to the findings.
- Allow for renewable fuels including renewable propane in the plan.
- Include low-NOx vehicle strategies that meet CARB’s 0.02g/bhp-hr NOx standard today in any scenario and analysis.
- Support propane vehicles because of their low cost of infrastructure and vehicles in this plan. Propane vehicles provides one of the most cost-effective paths for NOx reductions; allowing a broader impact on achieving air quality goals immediately.
- Preserve carbon negative values. CARB must provide an honest assessment for lifecycle emissions as this is a fundamental strategy to achieve overall air quality goals. We must include methane capture as a strategy to reach clean air objectives.

While each fuel source has its own advantages, many fleets across California and the nation choose propane to power their trucks. Propane provides fleet owners with a low emission, low cost, and high-energy fuel without compromising performance, range or engine life. We advocate supporting all low carbon solutions, based on the full fuel cycle carbon footprint to address environmental challenges. Propane provides reliability, affordability, stability and resiliency, all key when looking to transition California’s transportation sector to cleaner fuels.

The propane industry has and is investing heavily in renewable propane, derived from sustainable sources like beef tallow or vegetable oil. Renewable propane provides low carbon intensity scores, and can even be blended with renewable DME which provides for methane capture to help attain the State's emission reductions goals. Including renewable fuels in the scoping plan can play an important role by sending a signal to the market of the importance of in-state production of renewable propane and the continued production of low-NOx engines to help reduce greenhouse gas emissions for decades to come.

The Western Propane Gas Association appreciates your work on the Scoping Plan and looks forward to working with you as the State strives to reduce greenhouse gas emissions through comprehensive clean energy solutions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Granholm", written in a cursive style.

Ben Granholm

Regulatory Affairs Specialist