Bioenergy Association of California

September 28, 2016

The Honorable Richard Corey, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on the 2030 Scoping Plan – Transportation Element

Dear Mr. Corey:

I am writing on behalf of the Bioenergy Association of California to suggest some revisions to the Transportation Element of the 2030 Scoping Plan Update to make the Transportation Element consistent with the state's Sustainable Freight Strategy, 50 Percent Petroleum Reduction strategies, and greenhouse gas and air quality priorities. In particular, we urge the Air Board to set specific goals for near zero emission heavy duty vehicles that can provide enormous and immediate reductions in both climate pollution and air pollution. The Transportation Element places far too little emphasis on the heaviest duty trucks, which are the largest source of pollutants in the most heavily impacted air districts in the state.

The Bioenergy Association of California (BAC) represents more than 50 public agencies, private companies, local governments, environmental groups and others working to sustainably produce bioenergy from organic waste. BAC's public agency members include solid waste and wastewater agencies, air quality and environmental protection agencies, as well as cities and counties. BAC's private sector members include energy and technology providers, solid waste industry members, utilities, investors and others.

BAC makes the following suggestions to ensure that the 2030 Scoping Plan's Transportation Element maximizes cost-effective reductions in climate and air pollution.

1. Clearly Quantify GHG and Air Pollution Reductions from Each Technology, Sector and Fuel.

The heaviest duty vehicles – Class 7 and 8 trucks – cause a disproportionate share of climate and air pollution. Heavy duty diesel powered trucks also cause

the most damaging types of climate and air pollution – black carbon, a highly potent Short-Lived Climate Pollutant, and Toxic Air Contaminants (TACs). In California's two most impacted air districts, the South Coast and San Joaquin Valley, heavy duty trucks are the largest source of TAC's and smog-forming pollutants. As a result, the greatest opportunity to reduce the most potent climate and air pollutants in the transportation sector is from heavy duty trucks.

BAC urges the Air Board to quantify the climate emissions and air pollution by vehicle sector and fuel type, and to quantify the emissions reductions expected from each vehicle category and fuel type. In the case of heavy duty vehicles, it is critical to distinguish lighter duty trucks and transit vehicles, which may be electrified, from Class 7 and 8 trucks where the Air Board's own technology assessment has found they will not be electrified for decades (if ever).

To be science based and fully transparent, the Transportation Element must quantify the current emissions, potential emissions reductions and cost-effectiveness of each vehicle and fuel type.

2. Emissions Terms – "Zero" and "Near Zero" – Should be Based on Lifecycle Emissions and Be Transparent.

It is critical to be transparent about the lifecycle emissions of both "Zero Emission" and "Near Zero Emission" vehicles. The term "Zero Emission" and the ZEV program were adopted in the context of air quality, not climate change, protection and address tailpipe emissions only. In the context of climate change, which is the focus of the 2030 Scoping Plan Update, accounting and transparency of full lifecycle emissions is critical as upstream emissions (and reductions) can be equal to or greater than downstream reductions. This is particularly true when comparing ultra-low NOx heavy duty trucks, which can achieve much greater lifecycle emissions reductions than electric vehicles even when the EV's are running on 100 percent renewable power. In the best case, an EV running on renewable power is zero climate emission. An ultra-low NOx truck running on biogas from dairy waste or diverted organic waste is carbon negative and may provide several times the reduction in climate pollution that an EV provides. The difference in climate emissions is even greater when an EV is running on the California power grid which obtains just over half of all electricity from natural gas.

BAC also urges the Air Board to be transparent about the type of climate emissions at issue. As the Air Board's Proposed Strategy to Reduce Short-Lived Climate Pollutants makes clear, reducing SLCP's is one of very few strategies that can actually begin to slow climate change and reduce its impacts immediately.

3. Set Numeric Goal for Ultra Low NOx Heavy Duty Vehicles.

BAC urges the Air Board to set a numeric target for ultra-low NOx heavy duty vehicles, just as the Executive Order set a target for so-called Zero Emission

Vehicles. As noted above, ultra-low NOx vehicles may provide significantly greater reductions in climate pollution, but without a specific target to aim for, penetration of these vehicles is likely to remain at the pilot scale. At the time that the Governor issued Executive Order B-30-15, the ultra-low NOx engines had not yet been certified so the Executive Order did not include them specifically. Now that the engines have been certified, however, the Air Board should set a specific goal for their market penetration and assign an emissions reduction target to them.

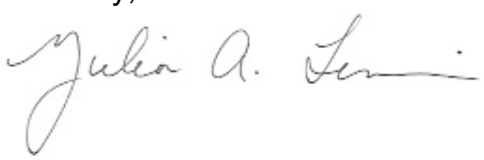
In the draft Transportation Element, Slide 50 proposes a scenario in which ultra-low NOx truck go from pilot scale to 900,000 vehicles on the road by 2030, and that renewable fuel for heavy duty trucks goes from 8 percent now to 50 percent by 2030. BAC urges the Air Board to adopt these as specific goals and to quantify the emissions reductions that would be achieved if these goals are met. With the right policies and incentives, these goals are achievable and the emissions reductions and other benefits – significant reductions in air pollution, wildfire, landfilling, etc. – would also be huge.

4. Align Incentives with Most Cost-Effective and Greatest GHG and SLCP Reductions.

AB 32 requires that cap and trade funds be spent to maximize cost-effective greenhouse gas reductions. AB 118 also requires funding to prioritize greenhouse gas reductions. The technology and fuels that can provide the greatest and most cost-effective greenhouse gas reductions are ultra-low NOx heavy duty trucks running on biogas. Dollar for dollar and vehicle for vehicle, there is no better investment the state can make to provide immediate and significant reductions in climate and air pollution. BAC urges the Air Board, therefore, to allocate a much greater share of the Low Carbon Transportation fund to ultra-low NOx trucks running on biogas. Allocating less than 20 percent of the Heavy Duty Vehicle Fund – and less than 10 percent of the total Low Carbon Transportation Fund – is not appropriate given the large and growing share of emissions caused by heavy duty vehicles, and the enormous opportunity to immediately reduce black carbon and Toxic Air Contaminant emissions.

With the changes described above, the Air Board will be able to maximize climate and other benefits in the Transportation Element of the 2030 Scoping Plan.

Sincerely,



Julia A. Levin
Executive Director