



DATE: September 28, 2016  
TO: California Air Resources Board  
FROM: Ryan Schuchard, Policy Director  
RE: ARB Scoping Plan

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CALSTART supports the aims and measures for clean transportation in the Scoping Plan as outlined in the recent Transportation Sector workshop.<sup>1</sup>

**Clean Transportation  
Technologies and Solutions**

[www.calstart.org](http://www.calstart.org)

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California's goals for 2030 are ambitious, and the clean transportation technology industry is one of the state's strongest assets for achieving them. As such, it is good that the framework includes a wide breadth of activities to accelerate clean transportation technology development, including aggressive VMT reductions and major commercialization efforts for new vehicle technologies and fuels. Nothing less than a transformation of transportation is required to meet global and state goals.

A main strength of the framework is that it combines standards with incentives for key beachhead zero-emission vehicle (ZEV) technologies, such as ZE transit buses, shuttle buses, last mile delivery trucks, forklifts, and ground service equipment. We endorse the specific goals of growing renewable truck fuels from 8% to 50% and increasing the last-mile ZE delivery truck population from around 300 to tens of thousands.

It is helpful that the plan is presented as a portfolio of interagency initiatives including Sustainable Freight and Low Carbon Fuel Standard, which need to continue and expand. As the ARB further develops the Scoping Plan, we encourage the following refinements:

1. **Present a comprehensive vision**, along with success measures, for technology deployment levels at 2030. This will help legislators and other stakeholders to understand what progress will look like.
2. **Illustrate how the different state agencies' activities support commercialization** of clean vehicles and fuels by technology readiness level (TRL), and how the agencies' work to advance technologies to new levels is complementary.
3. **Work with the California Public Utilities Commission (CPUC)** specifically to accelerate ZEV and biofuel deployment, including by ensuring a strong analytical basis for electrification pathways in the "SB 350" proceeding that is under way, and by collaborating to reduce barriers for pipeline injection of RNG, and to encourage the use of RNG as a transportation fuel.
4. **Establish an ambitious but achievable carbon intensity (CI) reduction target** for fuels, such as 20-25% from 2010-2030. Match this reduction target with increased incentives to bring low carbon fuel producers to the state, and particularly to disadvantaged communities.

Finally, we firmly believe stronger inducements and rewards for change will be needed. We stand the greatest chance of success if higher levels of incentive funding (e.g. \$650-700M per year) over longer-term periods of time are secured. We encourage ARB to work with other agencies and legislative bodies to develop approaches for securing such critical funding.

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<sup>1</sup> <https://www.arb.ca.gov/cc/scopingplan/meetings/091316/FINAL%20Scoping%20Plan%20Transport%20Workshop.pdf>