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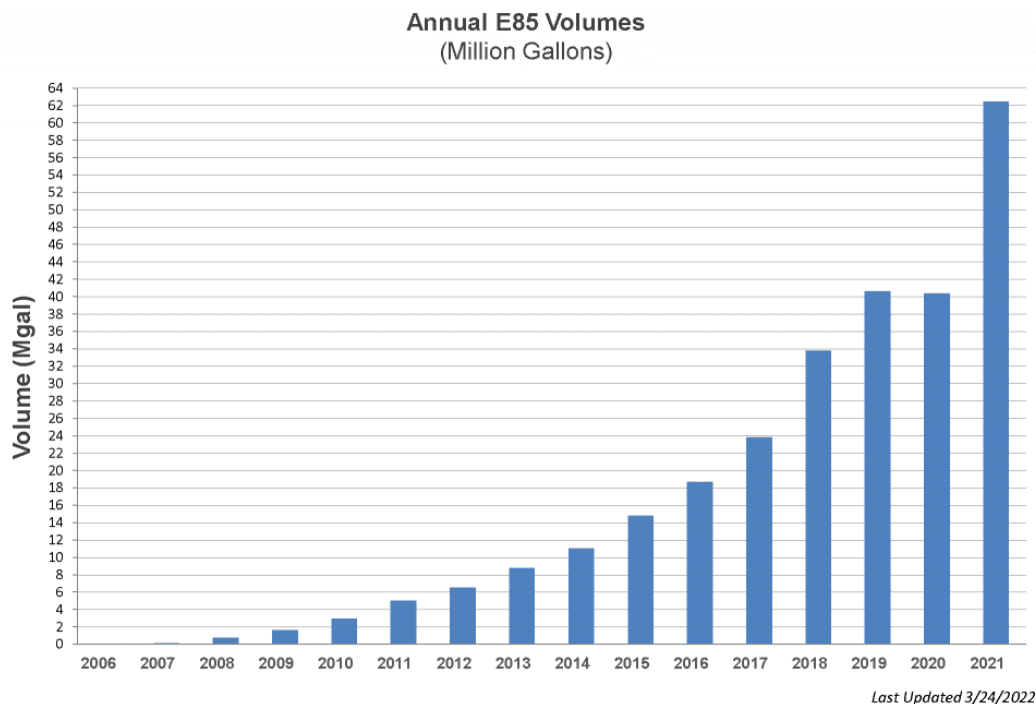
Re: 2022 Scoping Plan Update Scenario Concepts Technical Workshop

Dear Ms. Sahota,

The Renewable Fuels Association (RFA) thanks you for the opportunity to comment on the latest workshop on the Scoping Plan scenario modelling held on March 15, 2022. These comments should be considered in conjunction with the prior comments submitted by RFA in response to the earlier 2022 Scoping Plan Workshops held on July 9, 2021, and September 30, 2021, serving as updates to the prior record.

- **Current events in Ukraine underscore the immediate need to reduce petroleum dependence and maintain a diversified energy portfolio.** Energy security has moved to the top of the national agenda with the Russian invasion of Ukraine and the politicization of petroleum markets. U.S. produced biofuels offer an immediate opportunity to displace petroleum in the liquid fuel transportation supply while providing environmental and economic benefits. The 2022 Scoping Plan Update should recognize the need to maintain a diverse and resilient fuel supply that can be responsive to unpredictable international events. This is true now and with future electrification, given the vulnerability caused by the concentration of certain metals necessary for battery production in the hands of a small number of countries.
- **Scenarios 3 and 4 remain the most realistic, feasible, and affordable pathway for achieving carbon neutrality in California by 2045.** The E3 modelling presented at the March 15 workshop shows that Scenarios 3 and 4 are consistent with prior modelling and studies to achieve carbon neutrality in California without draconian measures such as retiring existing light-duty vehicles necessary in Scenarios 1 and 2. Repeated analysis shows that liquid fuels will be in the transportation mix throughout and beyond the time frames in the Scoping Plan, and deep decarbonization of the remaining liquid fuels is critical in achieving successful carbon neutrality.

- E15 facilitates valuable and immediate GHG reductions.** The adoption of E15 blends in California would reduce GHG emissions from transportation by approximately 2 million tons per year. Attached are the results of the recently completed emissions study (in part funded by CARB), conducted by the *UC Riverside Center for Environmental Research and Technology*, comparing E15 and E10. The results confirm that in addition to GHG reductions, E15 reduces most criteria pollutants. With ethanol trading today (and historically) at a significant discount to gasoline, E15 reduces GHG emissions, criteria pollutants, and consumer price, which is a rare and laudable combination. Currently, California and Montana are the only two states that do not recognize E15 as a legal fuel. CARB should expedite the immediate adoption of E15 as a legal fuel in California.
- E85 sustains further reductions in GHG reductions.** Higher blends of low carbon ethanol beyond E15 in the current gasoline pool remain the nearest term and most affordable path for additional reductions of GHG emissions from the light-duty fleet. In response to price signals provided by ethanol's lower cost and the California Low Carbon Fuel Standard (LCFS), E85 sales in the state increased by 55% in 2021 compared to 2020 based on CARB data. Requiring that all light-duty internal combustion engines sold in California be Flex Fuel Vehicles (FFVs) will enable the legacy fleet of vehicles to be capable of running on low- to zero-carbon ethanol over their useful life. Additionally, employing the sale and use of FFV PHEVs powered by renewable electricity and renewable liquid fuels under future ZEV requirements will sustain the GHG reductions from this practical and affordable option for California consumers.



This chart shows annual E85 volumes in California and is based on reported Test Program Exemption data.

- **Strengthening the LCFS compliance curves before and after 2030 builds the bridge to carbon neutrality by 2045.** As it relates to transportation policies, it is critically important to harmonize the LCFS with the goal of carbon neutrality by 2045 and send the long-term market signal necessary to encourage the significant new investment in innovative technologies required to meet decarbonization goals. The LCFS program has been a resounding policy success in efficiently reducing GHG emissions in California but at a 20 percent reduction in carbon intensity by 2030 the program is lagging the goal of carbon neutrality by 2045. The Scoping Plan should send a strong signal on the need to quickly strengthen the compliance curves of the LCFS consistent with carbon neutrality goals.

We appreciate the leadership of California on carbon policy and look forward to continued collaboration with CARB on the development of the 2022 Scoping Plan.

Sincerely,

Kelly Davis  
VP of Regulatory Affairs