



October 22, 2021

Rajinder Sahota
Deputy Executive Officer
Climate Change & Research
California Air Resources Board
1001 I St
Sacramento, CA 95814

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 technical workshop on the Scoping Plan scenario models held on September 30th. These comments should be considered in conjunction with the comments submitted by RFA together with other ethanol industry groups and companies submitted September 3rd in response to the prior 2022 Scoping Plan Workshop.

The RFA is the leading national trade association representing U.S. fuel ethanol producers. Its mission is to advance the development, production, and use of low-carbon fuel ethanol by strengthening America's ethanol industry and raising awareness about the benefits of renewable fuels. Founded in 1981, RFA serves as the premier forum for industry leaders and supporters to discuss ethanol policy, regulation, and technical issues. RFA's 300-plus members are working daily to help America become cleaner, safer, more energy secure, and economically vibrant.

The RFA is fully supportive of California's goal of carbon neutrality by 2045. The ethanol produced in the US today reduces GHG emissions by more than 50% compared to gasoline and with new technologies is aiming for net zero carbon emissions when measured on a full life cycle basis. Attached is a letter the RFA sent to President Biden in July signed by all its producer members committing the industry to carbon neutrality by 2050. Many ethanol producers will achieve this result well in advance of 2050.

The RFA is concerned about an approach in the Scoping Plan and subsequent regulations that would be overly prescriptive in determining outcomes. We have learned from the success of California's LCFS that technology neutral and inclusive approaches driven by market-based performance standards are the most effective. Developing scenarios can be illustrative but should not be designed in a way to close out known and even unknown technologies that can contribute to meeting carbon neutrality goals.

In addition to being technology neutral and inclusive, scenarios need to be realistic, feasible and affordable. RFA believes that Scenarios 1 and 2 presented at the September 20th workshop do not meet this test. Scenario 3 moves in that direction, but Scenario 4 is the best in this regard. As it relates to transportation, which represents nearly half of all GHG emissions in CA, Scenario 4 is consistent with the findings of the AB 74 ITS report, "Driving California's Transportation to Zero". This report is the most current, comprehensive, and well documented study on the subject. The ITS study clearly identified the need to utilize low to zero carbon biofuels in achieving carbon neutrality for decades to come.

Another focus of the Scoping Plan, and the state regulations it will influence, should be achieving the greatest reduction in GHG emissions starting as soon as possible. The most recent UN IPCC report made it alarmingly clear the imperative of further reducing GHG emissions immediately. The cumulative impacts of not reducing GHG emissions as soon as possible can be catastrophic. Ethanol blended into California gasoline at ten percent blends has delivered the single largest (35%) source of GHG reductions under the LCFS since its inception in 2011.

Higher blends of low carbon ethanol in the current gasoline pool represent the nearest term and most affordable path for immediate reductions of GHG emissions from the light duty fleet. Requiring that all light duty IC 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 PHEV vehicles 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.

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