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AMERICAN LUNG ASSOCIATION of California

March 17, 2005

California Energy Commission
Dockets Unit
Attn: Docket No. 06-BAP-1
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
Submitted via email to dockets@energy.state.ca.us

Re: Comments of American Lung Association of California
Draft Bioenergy Action Plan

Dear Chairman Boyd and Members, Bioenergy Interagency Working Group:

The American Lung Association of California is strongly supportive of efforts to reduce dependence on petroleum fuels and increase fuel diversity, especially in the transportation sector, as key strategies in the fight for cleaner air in California. We believe that bioenergy can make a contribution toward this goal as long as the strategies and fuel mixes employed do not result in increased emissions of criteria pollutants or air toxics. Any bioenergy plan developed by the state should be fully consistent with efforts to achieve and maintain state and federal health-based air quality standards and should not increase toxic emissions.

We strongly urge the California Energy Commission to give careful consideration to air quality and public health impacts when choosing which biofuels to promote. We strongly believe that California should resist any efforts to make trade-offs between reduction of air pollutants and greenhouse gases, or to trade off reductions in some criteria air pollutants against increases in other types.. Instead, the state should pursue reduction of criteria air pollutants, toxic air contaminants and greenhouse gases at the same time, without trading away air quality improvements. Given the extreme air pollution experienced in California and the difficulty in developing and funding strategies to reach state and federal air quality targets, we believe it is incumbent upon the California Energy Commission and other state agencies to ensure that biofuels do not exacerbate our air

pollution problems in any way and worsen the already heavy public health burden caused by pollution.

One of the specific strategies that could result in increases of criteria pollutants is the goal for increasing ethanol use through establishing minimum annual statewide ethanol consumption levels as well as development of a broad-based renewable fuels standard. The American Lung Association of California has expressed concerns for many years regarding the adverse air quality impacts of low blend ethanol fuels (E-6 – E-10). Recent studies have shown the permeation emissions from existing ethanol gasoline blends are already resulting in substantial increases in emissions of smog-forming compounds. We would be extremely concerned about pursuing strategies that rely on low-blend ethanol until these problems are resolved. Also, as you know, California is currently undergoing an evaluation of fuel emissions as part of the effort to review and update CARB's Predictive Model. This review process, which will not be completed until Fall, 2006 at the earliest, will provide additional information on the air quality impacts of ethanol blends and will better document the emissions concerns with low-blend ethanol. We are concerned that it may be premature to require minimum consumption levels for ethanol until the results of the Predictive Model review process is complete.

Due to the proven air quality concerns about low-blend ethanol, we believe that the Commission should aim to increase consumption levels for only high-blend ethanol or E85 rather than low blends that are associated with increased emissions of evaporative hydrocarbons and NOx.

We also recommend that the Commission look closely at the air quality impacts of biodiesel fuels in various transportation uses and ensure that the plan calls for mitigation of any excess NOx emissions generated by the use of biodiesel. From an air quality perspective, biodiesel is best used in fleets such as off-road, agricultural and marine engines where other (more effective) particulate matter retrofit controls are not currently available. Substituting biodiesel in a fleet where more effective pollution controls are available would not make sense from an air quality perspective. Biodiesel blends of 20% or greater can have air quality benefits as long as NOx emissions are fully mitigated, and as long as best available control technologies are used to reduce remaining particulate matter emissions from the diesel component of the fuel. All of these factors need to be considered when determining the best use of biodiesel fuel.

It is also important to note that additional emissions testing of both biodiesel blends and E-85 is needed to better assess emission impacts and to better understand when promotion of these fuels may be interfering with air quality goals.

In order to more clearly outline the air quality issues at stake with regard to ethanol, bio-diesel and other strategies, we would recommend adding an analysis of the air quality impacts of the various biofuel strategies under consideration to the bioenergy report. This section should include available information on permeation emissions from low-blend ethanol and a discussion of air quality impacts of biodiesel blends used in different type of fleets.

In summary, we believe that the California Energy Commission and the California Air Resources Board must work closely together to insure that the bioenergy plan is truly consistent with state and local efforts to improve air quality and achieve state and federal air quality standards. Thank you for your consideration of our comments. If you have any questions about our comments, please feel free to contact me at (916) 442-4446 ext. 11 or bhgen@alac.org .

Sincerely,

Bonnie Holmes-Gen
Assistant V.P., Government Relations
American Lung Association of California