

January 16, 2024

Advanced Clean Cars II Workshop  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

(Submitted via the Workshop Comment Submittal Form)

### **Re: Comments on the CARB Public Workshop: Advanced Clean Cars II (ACC II) Amendments Kick-Off Workshop**

The American Petroleum Institute (API)<sup>1</sup> respectfully submits comments on the November 15, 2023, CARB Public Workshop: Advanced Clean Cars II (ACC II) Amendments Kick-Off Workshop.<sup>2</sup>

The oil and gas industry supports over 1 million workers in California and contributes, directly and indirectly, \$217 billion to the state economy.<sup>3</sup> API members have made and continue to make significant investments in new technologies that reduce carbon emissions in transportation, including: stand-alone production and coprocessing of bio-feedstocks to make renewable fuels and renewable fuel blends; manufacturing of low-carbon ethanol; manufacturing of renewable natural gas from wastewater, landfill gas, and biodigesters at farms as fuel for compressed natural gas vehicles; production of blue and green hydrogen for transportation and stationary applications including building infrastructure; direct air carbon capture; carbon capture and sequestration of CO<sub>2</sub>; development of advanced plastics to meet auto industry standards and consumer expectations while mitigating environmental impact through emissions reduction and improved vehicle efficiency by light-weighting; and installation of electric vehicle charging stations.

The revisions to the ACC II rule do not include the full lifecycle analysis that considers that all vehicles have emissions across their life cycle from production, utilization, infrastructure, and disposal. Using this analytical method will provide the best opportunity to decarbonize the transportation sector. Simply analyzing tailpipe emissions is not a scientifically sound approach to assessing vehicle emissions. To provide comprehensive evaluation of GHG impacts, we encourage CARB to appropriately consider all of the environmental impacts of a ZEV program by accounting for the total life-cycle emissions.

Additionally, API supports the comments submitted by the Western States Petroleum Association (WSPA). API urges CARB to address the outstanding concerns identified by industry before finalizing any rule.

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<sup>1</sup> The American Petroleum Institute represents all segments of America's natural gas and oil industry, which supports more than ten million U.S. jobs and is backed by a growing grassroots movement of millions of Americans. Our nearly 600 members produce, process and distribute the majority of the nation's energy, and participate in API Energy Excellence, which is accelerating environmental and safety progress by fostering new technologies and transparent reporting. API was formed in 1919 as a standards-setting organization and has developed more than 800 standards to enhance operational and environmental safety, efficiency, and sustainability.

<sup>2</sup> <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/meetings-workshops>.

<sup>3</sup> Price Waterhouse Cooper, "Impacts of the Oil and Natural Gas Industry on the US Economy in 2021" Prepared for the American Petroleum Institute, April 2023, <https://www.api.org/-/media/files/policy/american-energy/pwc/2023/api-pwc-economic-impact-report-2023>.



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We appreciate this opportunity to provide comments and would be happy to discuss them in greater detail should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Prentiss Searles', written in a cursive style.

Prentiss Searles