



January 31, 2022

Carolyn Lozo & Lex Mitchell
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: California Advanced Biofuels Alliance (CABA) Comment Letter - Low Emission Diesel (LED) Study

Ms. Lozo and Mr. Mitchell,

The California Advanced Biofuels Alliance (CABA) appreciates the opportunity to comment on the Low Emission Diesel Study (LED).

CABA is a not-for-profit trade association promoting the increased use and production of advanced biofuels in California. CABA has represented biomass-based diesel (BMBD) feedstock suppliers, producers, distributors, retailers, and fleets on state and federal legislative and regulatory issues since 2006.

In order to better respond to the questions posed by the California Air Resources Board, CABA hired Trinity Consultants to conduct a Literature Review to compare the results of the LED study and previous studies.

Trinity compared the LED study results for New Diesel Technology Engines (NTDEs) to other results and examined the representativeness of the NTDEs used in the LED study and examined the impact of test cycles on the results of the LED study.

“Overall, it is unclear how the data from the LED study can be used, if at all, to estimate the impacts of the use of renewable diesel and biodiesel in California on NOx emissions. It is also noted that the development of emissions test data suitable for use in separating the effect of fuel composition and fuel properties on emissions is usually performed using statistically driven parametric experimental designs and data analysis methods like those employed in the Auto/Oil study and similar fuels testing programs. This type of design was not used in the development of the LED study and leads to the concerns with the results expressed...”

The findings of the literature review are explained in detail in the following attachment.

We look forward to working with you further on this. If you have any questions, please do not hesitate to reach out.

Sincerely,

A handwritten signature in black ink that reads "Rebecca Baskins".

Rebecca Baskins
Executive Director
California Advanced Biofuels Alliance