



Honorable Cottie Petrie-Norris, Chair
 Assembly Committee on Petroleum and Gasoline Supply
 1021 O Street, Room 1100
 Sacramento, CA 95814

September 25, 2024

Re: ABX2-3 (Gallagher): Gasoline Specifications -- Oppose

Dear Chair Petrie-Norris and Committee Members,

The undersigned organizations oppose ABX2-3 because it would weaken standards that protect Californians from air pollution and climate change.

Section 1. Exempting Oil Companies Would Render California's Greenhouse Gas Cap Ineffective.

Transportation accounts for by far the largest share of California's greenhouse gas emissions – roughly 50%, when upstream emissions are included, according to the Air Resources Board. Therefore, removing transportation fuels from the cap would fatally damage the program.

Section 2. Waiving Fuel Standards Could Undermine Health.

As the Energy Commission pointed out in its Transportation Fuels Assessment, introducing gasoline that does not meet California standards “could impose a negative pollution effect and potential risk to federal air quality attainment standards,” and those specifications “are included in the federally required State Implementation Plan for air quality and cannot be weakened without identifying substitute emission reductions.” The language in ABX2-3 does not address those serious problems.

Section 3. Weakening Volatility (RVP) Requirements Would Increase Smog.

Gasoline specifications are a crucial part of California's battle against the smog that continues to choke our people. The Reid Vapor Pressure requirements reduce evaporative emissions during our many warm months. Weakening those requirements by shifting to a winter blend when much of the state still experiences high temperatures means increasing the smog that is already by far the worst in the U.S. As the CEC noted, this option “could increase evaporative emissions and ozone levels for at least those two months, with potential persisting effects for several months.”

CEC also pointed out that this strategy brings “increased risk of violation of federal air quality attainment standards and related sanctions or litigation,” and “RVP and other gasoline specifications are included in the federally required State Implementation Plan for air quality and cannot be weakened without identifying substitute emission reductions.”

Gas prices spike for many reasons, including the greed of big oil companies. The lungs and health of our children, seniors, and other sensitive populations should not have to suffer as a response to those price spikes.

For these reasons, we oppose ABX2-3 as being an inappropriate, unfair and unhealthy response to high fuel prices.

Sincerely,

Bill Magavern
Policy Director
Coalition for Clean Air

William Barrett
Senior Director, Nationwide Clean Air Advocacy
American Lung Association

Julia May
Senior Scientist
Communities for a Better Environment

Daniel Barad
Western States Policy Manager
Union of Concerned Scientists

Melissa Romero
Deputy Legislative Director
California Environmental Voters

Gabriela Facio
Senior Policy Strategist
Sierra Club California

Katelyn Roedner Sutter
California State Director
Environmental Defense Fund

Laura Deehan
State Director
Environment California

Jenn Engstrom
State Director
CALPIRG

Kevin Hamilton
Senior Director Government Affairs
Central California Asthma Collaborative

Ellie Cohen
Chief Executive Officer
The Climate Center

Faraz Rizvi
Policy and Campaign Manager
Asian Pacific Environmental Network

Christina Scaringe
California Climate Policy Director
Center for Biological Diversity

Robert Gould, M.D.
President
San Francisco Bay Physicians for Social Responsibility

Adria Ventura
Legislative and Policy Director
Clean Water Action

Marcia Hanscom
Community Organizer
Defend Ballona Wetlands

Joel Ervice
Associate Director
Regional Asthma Management & Prevention

Dee Fromm
Managing Director
Coastal Lands Action Network

Robert van de Hoek
Senior Environmental Scientist
Ballona Wetlands Institute

Marc Carrek
President and Chief Executive Officer
Breathe Southern California

Allis Druffel
Chair
Immaculate Heart Community Environmental Commission

Peter De Gregorio
Climate Reality, Monterey Chapter

Teresa Bui
Climate Policy Director
Pacific Environment

Jane Williams
Executive Director
California Communities Against Toxics

Marven Norman
Policy Coordinator
Center for Community Action and Environmental Justice

Jane Vosburg

Board President
Fossil Free California

The Rev. Daniel Tamm
Chair
Los Angeles Faith & Ecology Network