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Organization:	California Energy Commission
Submitter Role:	Commission Staff
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RE: Comments on the Draft Transportation Fuels Transition Plan

Dear XX,

The undersigned members of the California Energy Commission's Independent Consumer Fuels Advisory Committee (ICFAC) appreciate the opportunity to provide comments on the Draft Transportation Fuels Transition Plan (TFTP). These comments reflect the perspectives and expertise of participating members and are intended to support the development of a transportation fuels transition that is affordable, reliable, equitable, and protective of public health.

The draft TFTP aims to address an important challenge facing California: how the state will manage the transportation fuels transition in a manner that maintains affordability and reliability while advancing climate, environmental, and health goals. The draft appropriately recognizes that California is entering a period of significant change as petroleum demand declines, transportation technologies evolve, and fuel markets adjust.

We appreciate the opportunity to provide feedback on the draft and recognize the effort undertaken to examine future fuel market conditions, transportation trends, and transition challenges. While the draft provides an important foundation for understanding California's transportation fuels future, we believe several areas could be strengthened to better address affordability, consumer vulnerability, public health, environmental justice, and community transition planning. The following recommendations are intended to support future iterations of the TFTP and strengthen its ability to guide an equitable and resilient transportation fuels transition.

Recommendation 1: Expand the TFTP's Affordability Framework Beyond Fuel Prices

The draft plan appropriately identifies affordability as a central concern during the transportation fuels transition. However, affordability should be evaluated through a broader lens than gasoline prices alone. Transportation affordability is influenced not only by fuel expenditures, but also by vehicle ownership costs, transportation options, commute distances, access to essential services, and household vulnerability to market disruptions.

Transportation systems also impose costs that are not reflected in the price consumers pay at the pump. Emissions from vehicles, freight operations, and other transportation-related activities contribute to air pollution that can increase quality of life and healthcare expenditures. These impacts create real economic burdens for households, employers, healthcare systems, and public programs, particularly in communities that experience disproportionate exposure to transportation-related pollution. As a result, affordability should be evaluated not only through direct fuel expenditures, but also through the broader economic costs associated with transportation-related pollution and exposure.

We recommend that future Transportation Fuels Assessments and related planning efforts incorporate metrics that evaluate transportation cost burdens, consumer vulnerability, access to affordable transportation alternatives, exposure to fuel price volatility, and the economic impacts associated with transportation-related pollution. A broader affordability framework would provide a more complete picture of how fuels production and transportation policies affect households and communities across California.

Recommendation 2: Prioritize Demand Reduction and Transportation Accessibility Alongside Supply Planning

The TFTP appropriately examines strategies to manage fuel supply and maintain reliability during the transition. However, long-term affordability and resilience will require reducing dependence on transportation fuels in addition to managing fuel supply.

Stakeholders throughout this process have emphasized the importance of public transit, transportation alternatives, and reducing transportation burdens. Demand reduction should not be understood simply as asking people to drive less. Many Californians travel out of necessity to access work, healthcare, education, childcare, groceries, and other essential services. For these households, reducing transportation costs often depends less on changing individual behavior and more on expanding the transportation and accessibility options available to them.

We encourage the CEC to more explicitly evaluate strategies that improve transportation accessibility and reduce transportation burdens, including public transit, active transportation, school transportation, community mobility programs, transit-oriented development, and improved access to essential services. The TFTP should also recognize the role that telehealth, medication delivery, local access to essential services, and other demand-reduction strategies can play in reducing transportation needs while improving affordability and quality of life.

These investments can simultaneously reduce fuel consumption, improve affordability, increase resilience to future fuel market volatility, and create new economic opportunities. More importantly, they help address the underlying drivers of transportation demand rather than focusing solely on fuel consumption itself. Future iterations of the TFTP would benefit from a more explicit discussion of how transportation accessibility and community planning can contribute to long-term reductions in fuel demand while improving outcomes for households across California.

Recommendation 3: Center Consumer Vulnerability and Transportation Reliance

The transportation fuels transition will not affect all Californians equally. Low-income households, environmental justice communities, rural residents, and individuals with limited transportation alternatives are often the most vulnerable to fuel price volatility and

transportation disruptions. Stakeholder discussions repeatedly highlighted concerns regarding affordability, transportation access, and the need to ensure that vulnerable communities are not disproportionately impacted during the transition.

We recommend that the TFTP incorporate a more explicit framework for evaluating impacts on populations, including transportation burden, access to alternatives, exposure to price volatility, and resilience during fuel market disruptions. Transportation resilience should also consider the fuel needs of emergency response systems, including firefighting equipment, emergency vehicles, disaster response operations, and aviation resources used during wildfire and emergency response activities. As California's fuel system evolves, planning efforts should evaluate how essential emergency services maintain reliable access to transportation fuels during periods of market disruption, supply constraints, or infrastructure transition. A successful transition should not only maintain system reliability but also improve transportation security and affordability for the communities that face the greatest challenges today.

Recommendation 4: Elevate Public Health as a Core Planning Metric

The TFTP recognizes that reducing reliance on fossil fuels can produce significant public health benefits. However, public health is often discussed as a secondary outcome rather than a core planning objective.

Transportation-related air pollution continues to contribute to asthma, cardiovascular disease, respiratory illness, adverse birth outcomes, and other health burdens, particularly in environmental justice communities located near refineries, freight corridors, ports, warehouses, and major transportation infrastructure. These health impacts also carry substantial economic costs through increased healthcare expenditures, missed workdays, lost productivity, and premature mortality.

We encourage the CEC to incorporate public health indicators as core performance metrics in future Transportation Fuels Assessments and related planning efforts, including reductions in pollution exposure, avoided healthcare costs, and community improvements.

Integrated public health metrics would provide a more comprehensive assessment of the benefits associated with transportation fuel transition strategies.

Recommendation 5: Strengthen Refinery and Community Transition Planning

The TFTP recognizes that refinery transitions may occur as transportation fuel markets evolve. Stakeholders consistently emphasized that the implications of these transitions extend beyond fuel markets and include impacts on workers, local economies, community stability, environmental remediation, public health, and fuel reliability.

We encourage the CEC to place greater emphasis on proactive transition planning for refinery-dependent communities. This should include workforce transition planning, economic diversification strategies, environmental remediation and cleanup obligations, community reinvestment opportunities, and meaningful engagement with workers, labor unions, local governments, and affected communities. Transition planning should also recognize that workers are also community members and may experience both the economic and public health impacts associated with refinery operations and refinery transitions. Transition planning should also recognize the relationship between refinery safety, worker protection, emergency preparedness, operational reliability, and fuel market stability. Workers are often the first to respond to operational incidents and emergencies, while nearby communities may experience the consequences of releases, fires, or other facility disruptions. Maintaining safe operations during a managed decline is therefore important for protecting workers, communities, and fuel system reliability. As California navigates a managed decline in petroleum infrastructure, maintaining safe operations and minimizing unplanned disruptions will remain important for protecting workers and nearby communities while reducing the risk of fuel supply disruptions and market volatility.

A successful transition should not be measured solely by emissions reductions or fuel market outcomes, but also by whether workers, their families, and affected communities are supported throughout the transition process, and whether California is prepared to manage refinery transitions in a safe, equitable, and orderly manner.

Recommendation 6: Maintain Transparency and Meaningful Public Engagement

One of the positives of the TFTP process has been its commitment to make the fuel market understandable, transparent, and opportunities for engagement with stakeholders. Participants throughout the workgroup process consistently emphasized the importance of maintaining accessible information, meaningful public participation, and ongoing opportunities for community input.

We encourage the CEC and CARB to continue building upon these efforts through transparent reporting, accessible communication of transition-related risks and opportunities, and continued engagement with environmental justice communities, workers, industry representatives, local governments, and other stakeholders.

Transportation fuel markets are complex, and public discussions often oversimplify the factors that influence affordability and reliability. Continued transparency and public education can help improve understanding of market dynamics, policy tradeoffs, and transition strategies while strengthening public trust in the process.

Path Forward

The Draft Transportation Fuels Transition Plan represents an important step toward understanding how California's transportation fuel system may evolve over the coming decades. However, ensuring that the transition is affordable, reliable, equitable, and protective of public health will require continued attention to affordability, transportation accessibility, consumer vulnerability, public health outcomes, refinery transition planning, and meaningful stakeholder engagement.

As future Transportation Fuels Assessments and related implementation efforts are developed, we encourage the CEC and CARB to strengthen these areas and continue working with communities, workers, public health experts, environmental justice advocates, and other stakeholders. Doing so will help ensure that California's transportation fuels transition not only reduces emissions, but also improves affordability, health outcomes, resilience, and economic opportunity for communities across the state.

Sincerely,