



Airlines for America®
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June 14, 2023

Submitted electronically at:

<https://ww2.arb.ca.gov/public-comments/may-31-june-1-2023-low-carbon-fuel-standard-virtual-community-meetings-public>

Ms. Cheryl Laskowski
Chief, Transportation Fuels Branch
Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Airlines for America® Input on the May 31 and June 1, 2023, Virtual Community Meetings to Discuss Potential Future Changes to the Low Carbon Fuel Standard (LCFS) With California Air Resources Board (CARB) Staff

Dear Ms. Laskowski:

Airlines for America® (A4A), the principal trade and service organization of the U.S. airline industry,¹ appreciates the opportunity to provide feedback on the California Air Resources Board's (CARB) May 31 and June 1, 2023, Virtual Community Meetings to Discuss Potential Future Changes to the Low Carbon Fuel Standard (LCFS).

The U.S. airline industry has a strong climate change record and has committed to working across the aviation industry and with government leaders in a positive partnership to achieve net-zero carbon emissions by 2050 (2050 NZC Goal). This parallels the Biden Administration's goal to achieve net-zero greenhouse gas (GHG) emissions in the aviation sector by 2050. Airlines, governments – including California – and other aviation stakeholders have also recognized that achieving net zero aviation emissions by 2050 will require a very rapid transition from conventional (fossil) jet fuel (CJF) to sustainable aviation fuel (SAF). Accordingly, A4A and our members have also set a goal of making 3 billion gallons of cost competitive SAF available to U.S. aircraft operators in 2030 (2030 SAF Goal), a goal that mirrors the Biden Administration's SAF Grand Challenge Goal. Airlines are pleased to share these mutually reinforcing goals with the federal government, particularly as aviation is universally recognized as a "hard to abate" sector which will only be successfully decarbonized through strong cooperation and partnerships between governments and aviation stakeholders, including airlines.

In this context, we appreciate that California has also adopted a very ambitious net-zero emissions goal and recognize that SAF will be essential to meeting this goal. We emphasize our

¹ A4A's members are: Alaska Airlines, Inc.; American Airlines Group Inc.; Atlas Air, Inc.; Delta Air Lines, Inc.; Federal Express Corporation; Hawaiian Airlines, Inc.; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada, Inc. is an associate member.

great appreciation for CARB's past and ongoing support for SAF and are firmly committed to working with CARB to rapidly expand availability and deployment of SAF in California.

However, we remain concerned that CARB staff continues to consider the possibility of including conventional jet fuel (CJF) in the LCFS program as an obligated fuel. We have detailed our concerns about this concept in multiple comments previously (which we incorporate here by reference)² highlighting that we do not believe this approach will be effective to support our shared goals for reducing emissions and rapidly expanding SAF production. We believe there are other approaches which may be as or more effective in accomplishing our mutually held objectives of expanding SAF production and use in California.

To this end, A4A would welcome the opportunity to cooperate with CARB to develop an alternative approach that will most effectively build on the progress that we have collectively made to date and attain our shared goals.

* * *

Thank you for your consideration of our feedback. Please do not hesitate to contact us if you have any questions.

Sincerely,



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² See [January 7, 2022 Comments](#) (on December 7, 2021, workshop); [August 8, 2022, Comments](#) (on July 7, 2022, workshop), and [March 15, 2023, Comments](#) (on February 22, 2023, workshop and Draft Regulatory Language).