



June 14, 2023

Cheryl Laskowski
California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: LA County Truck and Bus Coalitions Recommendations for Updates to the Low Carbon Fuel Standard

Dear Ms. Laskowski:

On behalf of the Los Angeles County Electric Truck and Bus Coalition and undersigned individual coalition members, we write regarding the proposed revisions to the Low Carbon Fuel Standard (LCFS). LCFS revenues amount to \$3-4 billion a year, and it is our understanding that 77% of this amount goes to combustible biofuels. Without understanding the full extent of staff's current proposals for changes, we remain concerned that these proposed changes may reduce investments in polluting combustion at some point in the future, but fail to support zero-emission fuels at the scale and pace needed to attain federal and state air quality standards and protect Californians from pollution harms. We therefore recommend systemic changes that will align the program with our air quality needs and provide critical and timely support for key zero-emissions fleets throughout the State.

I. The LCFS Must Align with Air Quality Planning.

The most recent Air Quality Management Plan (AQMP) for the South Coast Air Basin notes "the only way to achieve the required NOx reductions is through extensive use of zero emission technologies across **all stationary and mobile sources.**"¹ This represents a significant change in understanding the impediments to attainment from prior AQMPs. The standard is no longer just making the air "cleaner."

Unfortunately, the LCFS remains a primarily combustion program. The vast majority of support from the program goes towards fuels that combust and generate criteria pollutant emissions. Given that approximately 77% of the program revenues support combustible fuels, we do not think the program aligns with our clean air attainment goals. We recognize that Staff is considering changes that would incrementally reduce the lopsided support for combustible fuels, but these proposed changes likely will not go far enough.

¹ Final 2022 AQMP, at Executive Summary, <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/03-es.pdf?sfvrsn=6>.



Many programs can claim to make the air “cleaner.” For example, an LCFS program that has half of its funds support zero-emission fuels and another half support combustion fuels could technically make the air “cleaner.” But this type of program design would still invest tens of billions of dollars in combustible fuels in the next decade and a half, locking us into dirty technologies that will continue to emit harmful pollutants and thwart California’s ability to fulfill its clean air requirements. Unless CARB rapidly phases out program support for combustible fuels, the LCFS will contribute to our continued chronic nonattainment, and the health of millions of Californians will continue to suffer as a result. Accordingly, we recommend that the LCFS program fully align with the scope of reductions needed over the next 15 years to assist our air quality planning by eliminating its support for combustible fuels as soon as possible.

II. The LCFS Should Support Efforts to Reduce Air Pollution from Transportation – Particularly the Innovative Clean Transit Rule and Commitments to Convert all of California School Buses to Zero-Emissions by 2035.

There are significant efforts underway all over the State to electrify transit buses and school buses, along with priority truck fleets like port drayage. For example, California has adopted its Innovative Clean Transit Rule, allocated more than a billion dollars to school bus electrification, and identified priority fleets in its Advanced Clean Fleets rule. The following paragraphs outline suggestions to make the LCFS more effective in promoting clean transportation.

First, the LCFS should provide more support for zero-emission transit. The rationale for this change is obvious. Transit agencies have been leaders in advancing zero-emissions transportation, and millions of Californians rely on them to provide reliable transportation services. Ensuring “market”-based programs like the LCFS advance efforts that benefit Californians—particularly those who are transit-dependent—is a no-regrets investment for the State. With cratering prices from the LCFS, it has become less and less effective in supporting transit agencies electrifying their fleets. Given that transit is vital to advancing transportation electrification, in addition to providing a cleaner way for commuting, the LCFS should boost the support for fuel used in this critical sector. Finally, this approach is justified given transit buses carry large volumes of passengers, which magnifies the climate and clean air benefit.

Second, like transit agencies, many California school districts are working hard to electrify their fleets. However, their ability to scale up to fully clean fleets is constrained by budget shortfalls. The LCFS can play a key role in filling these gaps and boosting their reach. Furthermore, more revenue could even allow them to expand pupil transit as they electrify, which will be a net positive for all Californians. Given that school buses transport young



Californians who need clean air and provide a needed resource, the LCFS should increase support for fuel used in this critical sector as well. And like transit buses, school buses carry large volumes, which has significant climate and clean air benefit.

Finally, the LCFS should also target electrification of port drayage and other priority fleets. These fleets serve our ports and railyards and must be electrified to reduce harmful air pollution and to start to address the rampant environmental injustice from our freight facilities. Support for the zero-emissions conversion of drayage and other important fleets that impact overburdened communities is a critical environmental justice priority.

III. The Agency Should Explore the Extent to Which It Can Include Good Jobs Standards Into Programs like the LCFS.

As we transition to a clean energy economy, it will be important to make sure all of our programs support jobs that provide good wages and benefit our underserved communities. We call on CARB, in all of its programs, to determine how it will support good actors in the clean energy economy.

We appreciate your consideration of these comments, and we look forward to working with CARB to develop a program that prioritizes truly zero-emissions transportation.

Sincerely,

Adrian Martinez

Los Angeles County Electric Truck and Bus Coalition

Jasmin Vargas

Jobs to Move America