



October 25, 2023

California Air Resources Board
1001 I Street,
Sacramento, California 95814
Via Electronic submittal

Re: Amendments to the Low Carbon Fuel Standard

To the Air Resources Board:

The Coalition for Clean Air has long supported the Low Carbon Fuel Standard as an essential tool for reducing harmful emissions from the transportation sector, California's largest source of both air and climate pollution. The LCFS supports both the end goal of achieving zero-emission transportation and the interim goal of substituting low carbon renewable fuels for gasoline and diesel during the current period when we still have combustion vehicles on the road. Because of the magnitude of our air pollution and climate crises, we now need the LCFS to both work harder, through greater stringency, and work smarter, by incenting the cleanest fuels and avoiding harms to communities.

Accordingly, we participated in the September 28 Board hearing, and we support the following amendments to the LCFS:

- 1. Increase the stringency of the program, and add an acceleration mechanism.**
Meeting California's greenhouse gas emission caps under SB 32 and AB 1279 will require more rapid progress in phasing out petroleum fuels in the transportation sector, our largest source of climate-changing emissions. Alongside CARB's regulations and incentives for deploying cleaner engines, and the state's as-yet unrealized targets for reducing vehicle miles travelled, the LCFS provides a vital tool for curbing transportation emissions, as reiterated by the 2022 Scoping Plan Update, which calls for a 94% reduction in petroleum use and identifies the LCFS as a key route to that goal. We support inclusion of an auto-acceleration mechanism as a backstop to assure that the market in cleaner fuels stays at a robust level.
- 2. Remove the exemption for aviation fuel.**
Conventional jet fuel should be held to the same standard as other petroleum-based transportation fuels. California currently lacks a comprehensive plan for decarbonizing

aviation fuels, and including conventional aviation fuel as a deficit generator under the LCFS would help to spur innovation in cleaner fuels and equipment. Cleaning up aviation fuels and equipment will also help protect the health of workers and communities who are most exposed to the emissions from this sector.

3. Use utilities' base residential LCFS credits for programs promoting equity in both zero-emission personal mobility and clean freight infrastructure.

LCFS base residential credit proceeds generated by EDUs from electricity used as a transportation fuel should be used to effectively and equitably hasten the adoption of zero-emission electrified transportation. Now that California has a mature EV market, the statewide Clean Fuel Reward should be reconceived as a transportation equity program that supports low and moderate-income households in the purchase or lease of new or used EVs and/or in the charging of their EVs. Utility holdback revenues should be focused almost entirely (at least 75%) on equity purposes, including supporting low and moderate-income households with alternative mobility options – including EV car-sharing, vanpooling, e-bikes and electrified transit – vehicle mobility options, and deploying charging infrastructure for medium and heavy-duty vehicles in both on and off-road sectors.

4. Limit crediting of crop-based biofuels.

CARB should establish guardrails to prevent incentivizing conversion of crop lands to fuel production, which exacerbates already-existing food shortages in much of the world. While biofuels made from wastes provide a net climate benefit, using productive land to produce fuel is detrimental to the climate, because carbon-absorbing natural land elsewhere will be converted into crop production.

5. Phase out crediting of oil projects.

California should be planning a transition away from fossil fuels, so allowing credits for oil projects provides a perverse incentive to perpetuate the very problem that the LCFS seeks to solve.

6. Create an infrastructure crediting provision for fueling of medium and heavy-duty zero-emission vehicles.

CARB regulations, which we support, require a transition to zero-emission engines in buses, trucks and other medium and heavy-duty vehicles. That transition is essential to solving our air pollution and climate crises, and infrastructure challenges are probably the biggest single obstacle to success. Therefore, we support creation of an infrastructure crediting mechanism for medium and heavy-duty refueling for zero-emission vehicles, both battery-electric and fuel-cell electric.

CARB should regulate methane emissions from large dairies.

This issue is not included within the four corners of the LCFS rulemaking but is related. Dairies are the largest California source of methane, a potent short-lived climate pollutant. CARB should

require the large dairies to reduce their emissions of both manure and enteric methane. The regulations should also strive to protect local communities from the adverse impacts of large-scale dairy production.

We look forward to continued discussions as the Board considers the LCFS amendments.

Respectfully,

A handwritten signature in cursive script that reads "Bill Magavern".

Bill Magavern
Policy Director
Coalition for Clean Air