

April 21, 2009

Mary Nichols, Chairman
California Air Resources Board
1001 "I" Street, P.O. Box 2815
Sacramento, CA 95812

RE: Support California's Proposed Low Carbon Fuel Standard (LCFS)

Dear Chairman Nichols,

The undersigned California Clean Cities Coalitions support efforts to adopt practices that contribute to the reduction of petroleum consumption in an effort to reduce our dependence on foreign oil, protect public health and combat global warming.

Sponsored by the U.S. Department of Energy's (DOE) Vehicle Technologies Program (VTP), Clean Cities contributes to the energy, environmental, and economic security of the United States by supporting local decisions to reduce our dependence on imported petroleum. Established in 1993 in response to the Energy Policy Act (EPAAct) of 1992, the partnership provides tools and resources for voluntary, community-centered programs to reduce consumption of petroleum-based fuels.

In almost 90 coalitions, government agencies and private companies voluntarily come together under the umbrella of Clean Cities. The partnership helps all parties identify mutual interests and meet the objectives of reducing the use of imported oil, developing regional economic opportunities, and improving air quality.

Motor vehicles contribute to global warming and are currently limited to transportation fuels that are widely available. A state policy that will spur the production of a whole new generation of clean, low carbon transportation fuels—so that our government fleet, local business fleets, and residents can use these cleaner, greener fuels—is a win-win for all. **California's proposed Low Carbon Fuel Standard (LCFS) is one such policy and we support the Air Resources Board's staff proposal except as noted below.**

The LCFS is a critical component of the state's plan to achieve its AB 32 greenhouse gas reduction goals, contributing roughly 10% to the state's 2020 reduction targets. Because transportation is the single largest source of California's global warming pollution, the state is correct to prioritize this sector and to ensure that fuel providers contribute their fair share to the state's overall emissions reductions.

The LCFS rewards and incentivizes investment in the cleanest low carbon fuels and discourages investment in dirtier, higher carbon fuels. By accounting for the full lifecycle of a fuel, including indirect land use impacts for various biofuels, the standard ensures that the cleanest fuels such as electricity, natural gas, hydrogen, and superior advanced biofuels made from waste, non-food crops, and new sources such as algae will thrive because they have lower lifecycle greenhouse gas emissions than gasoline or diesel. **However, we are concerned that the LCFS, as proposed, does not include dedicated anaerobic digestion of organics to biogas. We are also concerned that the LCFS includes landfill gas, but does not account for fugitive landfill emissions, which distort true carbon impacts.**

We also support the LCFS because it will spur innovation and economic growth in our state and our communities, keeping dollars here at home and creating local jobs, while contributing to both energy and climate security, and avoiding fuel price swings. All Californians will benefit from fuel price stability.

California has already demonstrated it can save energy while growing the economy through its groundbreaking energy efficiency and green tech policies. It is time once again for California to serve as a model to the nation and the world with the Low Carbon Fuel Standard.

Sincerely,

<p>Vandana Bali </p> <p>San Francisco Clean Cities Coalition Coordinator, Manager, Clean Vehicles Program, SF Environment vandana.bali@sfgov.org</p> 	<p>Margo Sidener </p> <p>Silicon Valley Clean Cities Coalition Coordinator, President and CEO of Breathe California of the Bay Area margo@lungsrus.org</p> 	<p>JoAnn Armenta </p> <p>Southern California Association of Governments Clean Cities Coalition joann@the-partnership.org</p> 
<p>Suzanne Seivright  on behalf of Suzanne Seivright</p> <p>Co-Coordinator, Clean Cities Coachella Valley Region sseivright@smartevo.net</p> 	<p>This space intentionally left blank.</p>	<p>This space intentionally left blank.</p>