



December 14, 2011

Chairman Mary Nichols
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95812

RE: Public Health Support for California’s Low Carbon Fuel Standard

Dear Chairman Nichols,

The undersigned members of California’s public health and medical community strongly support California’s landmark Low Carbon Fuel Standard (LCFS) as a critical component of California’s strategy to meet clean air and AB 32 goals. The LCFS is proving to be a successful program, and will continue to spur investment and innovation toward ever-cleaner fuels and vehicles over the next decade. As the California Air Resources Board (CARB) considers revisions to the program, we urge you to reject the calls of the oil industry for weakening changes, to re-double your commitment to clean, alternative fuels, and to ensure that any revisions strengthen effective implementation to move us to a cleaner future.

The LCFS contributes to the fight against climate change and encourages a shift to healthier transportation options such as renewable energy and hydrogen, as well as advanced biofuels, which will reduce the devastating impacts of vehicle pollution on the health of Californians. We also believe the LCFS to be particularly important in supporting California’s zero emission vehicle program. As the LCFS serves to increase investment in the cleanest fuels, it will help to reduce asthma attacks, lung cancer, heart, lung and other diseases; relieve pressure on overcrowded hospital and emergency rooms; curb the thousands of annual premature deaths due to air pollution each year in our state; and cut the billions of dollars in health care costs associated with air pollution in California.

Because of the promise offered by the LCFS, we are extremely disappointed that the oil industry attempts to undermine the program. Specifically, we are opposed to changes that would weaken the “High Carbon Intensity Crude Oil” (HCICO) provision that correctly holds oil companies accountable for the *relative* cleanliness and dirtiness of petroleum fuels. If the oil industry had their way, all petroleum fuels would be treated the same under the LCFS, leading to an influx of ever-dirtier sources of petroleum into California. This is unacceptable.

We support CARB’s proposal to maintain strong fuel accounting provisions to ensure that petroleum fuels do not become dirtier over time, thereby undermining the LCFS and our clean air goals. A strong LCFS should support, not hinder, California’s clean air and climate goals. We believe that the program should:

1. Maintain the on-time implementation of the LCFS program to ensure that our transportation fuels meet and exceed the goals of a ten percent reduction by 2020.
2. Ensure proper accounting for all fuels and ensure that petroleum fuels do not become dirtier over time by allowing even dirtier, higher-carbon petroleum to be included in the program without penalty.
3. Provide greater incentives for individual refiners to report on and benefit from innovative approaches to cleaning up their fuels beyond the “statewide average” approach proposed in the current regulatory draft.

These components will provide greater incentive to individual companies to clean up their fuels and improve our air at the same time.

The well-known public health toll caused by our current petroleum dependency will not go away on its own. California’s landmark policies to cut pollution to improve and save lives are critical to cleaning our own air and pushing the world toward a healthier future. We must not allow the oil industry to dictate clean air policy.

California’s leadership on the LCFS must remain true to its goal of generating cleaner fuels, must remain on schedule and must remain rooted in clean air and public health. We encourage you to preserve these components of the program and to seek further opportunities to improve the LCFS over time.

We look forward to helping achieve these goals with you and thank you for your consideration of these comments.

Sincerely,

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