



March 11, 2011

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Michelle Buffington
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California Air Resources Board
1001 I Street
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RE: LCFS Advisory Panel Priorities

Dear Ms Buffington:

On behalf of the American Lung Association in California (ALAC), I am writing to provide our organization's priorities for the Low Carbon Fuel Standard (LCFS) Advisory Panel. ALAC is committed to the implementation and success of the LCFS and appreciates the opportunity to take part in this important discussion.

ALAC views the LCFS as a critical strategy to reduce greenhouse gases and curb our petroleum dependency. We believe that the LCFS Program Review Advisory Panel should provide input to the California Air Resources Board (CARB) as to the progress made and hurdles faced in maintaining momentum toward the success of this program (**Program Review Topics 1, 11**).

Broadly, this advisory panel should support strong implementation of the LCFS to achieve the program's global warming goals while also supporting California's' air quality and public health goals (**Topics 9, 10**). In order to best serve these goals, ALAC offers the following priority areas and recommendations for the advisory panel process:

Assessment of Public Health Impacts of the Low Carbon Fuel Standard

(Topic 9) CARB should establish a process for ongoing assessment of public health impacts associated with the implementation of the LCFS that builds on the existing modeling of public health impacts conducted in the rulemaking process. CARB should engage the AB32 Public Health Working Group (coordinated by the California Air Resources Board and the California Department of Public Health) to review actual outcomes against those modeled in the initial health analysis. In order to foster the development of ongoing evaluations, AB32 Public Health Work Group staff from the Department of Public Health should be invited to participate in the advisory panel discussion on LCFS public health impacts work.

Assessment of Air Quality Impacts of the Low Carbon Fuel Standard (Topic 10)

As with the public health analysis process, CARB should follow through on the recommendations presented in the Biorefineries Siting Guidance document to conduct ongoing assessments of real-world emissions that occur as new facilities are sited in California. CARB should work with local permitting agencies to ensure that emissions generated by facility operations (on-site and transportation-related) are fully evaluated and whether additional mitigation strategies are

needed. Particular attention should be paid to ensuring that communities already identified by CARB as being disadvantaged by air pollution not be further burdened by the addition of new biorefineries.

Incentivizing Ultra-Low Carbon Fuels (Topic 5) The success of the LCFS will provide a greater market for extremely low carbon, non-liquid fuels such as renewable electricity and hydrogen needed to meet California's climate and air quality goals. It is important that the advisory panel discuss the growing market and commercialization of such fuels (**Topic 6**), barriers faced (**Topic 11**), and how the LCFS could best incentivize ultra-low carbon fuels that are critical to meeting California's climate and air quality goals.

Support Additional Air Resources Board Goals The Panel should work to ensure that additional goals stated in the Board's LCFS resolutions are properly addressed:

- **Workgroup Reports** As ARB has established numerous workgroups (*e.g.* Sustainability, High Carbon Intensity Crude Oil, Full Lifecycle Accounting (**Topics 3, 4, 12**), etc.), the advisory panel should receive relevant updates to understand the challenges and progress made on these topics by subject-area experts. The expert work group reports will assist the advisory panel in understanding and reporting on progress to the Board relative to the various topics covered in the resolutions.
- **Transparency in the LCFS Market** A formal process for public review of credit prices, accrual, banking, tracking and trading involved in the LCFS market should be at the core of the market's operation, and is worthy of discussion by the advisory panel. An open market is key to ensuring proper public oversight as well as for allowing innovative market entrants to gauge their ability to function in support of the goals of the LCFS.

In closing, ALAC again appreciates the opportunity to provide input into the panel priorities and looks forward to working with you to ensure that the LCFS implementation remains on target to reduce harmful emissions and better promote public health in California.

Sincerely,

Will Barrett
Air Quality/Global Warming Policy Coordinator