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Katrina Sideco
California Air Resources Board
1001 I Street
Sacramento, CA
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Re: Comments on May 30th LCFS Workshop

Dear Ms. Sideco:

On behalf of the American Lung Association in California, I am writing to comment on the May 30th workshop on the Low Carbon Fuel Standard (LCFS). The Lung Association is a strong supporter of the LCFS as a critical component to California's AB 32 programs to protect public health against the worst impacts of climate change. We believe that the transition to cleaner, more sustainable fuels under the LCFS will provide a wide range of benefits to California's health, environment and economy and that future assessments of the program should reflect these positive outcomes.

Support for Comprehensive Environmental, Health and Economic Assessments

The Lung Association supports updating the environmental assessment to include a broader analysis of the beneficial impacts of the LCFS in this assessment. We believe that this element of the LCFS update is critical to providing a full view of the benefits of the transition to cleaner, lower carbon fuels as the LCFS is implemented and continues to spur innovation needed to achieve California's climate change goals.

The benefits of the LCFS should also be evaluated within the context of the planned economic assessment. Within the first AB 32 Scoping Plan update, CARB estimated over \$4 billion in avoided health costs due to AB 32 implementation, and noted in the recent First Update to the Scoping Plan that AB 32 implementation will save consumers hundreds of dollars per year in transportation costs as programs generate more efficiencies. Recently, the American Lung Association in California and Environmental Defense Fund co-released *Driving California Forward* (<http://www.edf.org/drivingcaliforniaforward>), a report documenting that the LCFS and fuels under the Cap and Trade program would avoid over \$23 billion in health, energy security and climate pollution costs by 2025. These types of evaluations provide the public with much more tangible benefits of vital programs like the LCFS. As with the comprehensive approach to the environmental assessment, ARB should provide the positive job creation,

public health, environmental and other economic benefits of the LCFS in the economic assessment to provide a full picture of the program.

Updated Guidance On Biorefinery Facilities

In order to maximize the health benefits being achieved by the LCFS and increase community understanding and education about these facilities, CARB should also provide the most updated guidance on reducing community impacts related to the siting of new fuel production facilities in California. The 2011 Air Quality Guidance for Siting Biorefineries in California document, and listing of biofuel production facilities, should be updated by CARB to identify and reflect the latest in technologies, operational requirements and siting considerations to reduce emissions and potential health impacts on local communities, whether through fuel production or transportation of fuels and feedstocks to and from the facility. Discussion of new cumulative impact screening tools such as CalEPA's CalEnviroScreen should be included in the guidance to inform local air district permitting processes with the latest data on disadvantaged communities as well as public outreach and engagement strategies.

Support for Expanded Electricity Crediting

The American Lung Association in California supports the inclusion of additional electricity credit generation opportunities within the LCFS. Allowing credit generation from electric transit and other transportation sources would add value to non-petroleum fuels needed to meet California's climate and air quality goals and generate credits to further strengthen the LCFS market.

Support for Ongoing Administrative Improvements

We also support ongoing efforts to improve the administration, reporting and enforcement provisions of the program as more information becomes available.

We look forward to working with the staff on the proposals and update to the program as a whole, as well as the ARB's consideration of more aggressive LCFS targets for 2030 as outlined in the Scoping Plan Update.

Sincerely,

Bonnie Holmes-Gen
Senior Director, Policy and Advocacy