AMERICAN LUNG ASSOCIATION.

September 5, 2017

Sam Wade, Chief
Transportation Fuels Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Lung Association comments on LCFS pre-regulatory workshop

Dear Mr. Wade:

On behalf of the American Lung Association in California, I am writing to provide our input on the ongoing development of the Low Carbon Fuel Standard. Our organization believes that this program has the ability to extend California's longstanding clean air and climate change leadership and success in reducing the harms caused by transportation fuels.

Largely as the result of the transportation sector dependence on fossil fuels, California is home to some of the most difficult air pollution challenges in the United States. Too many California communities are disproportionately impacted by transportation pollution health impacts, including many low income communities, communities of color, children, seniors and those living with respiratory illnesses such as asthma, COPD and lung cancer. These challenges are exacerbated by climate change impacts on public health, and speak to the need for strong and continued success of programs like the LCFS.

We believe that the post-2020 LCFS must maintain a stringent drive to lower-carbon fuels, and must continue the program's successful history of adjusting to new data on the impacts and benefits of fuels covered by the program. Our comments below reference concepts discussed during the pre-regulatory workshop held on August 7, 2017.

Support for an LCFS target over 20 percent – the Lung Association supports a 2030 fuel carbon intensity reduction target of over 20 percent. In prior comments submitted within the development of the 2030 Scoping Plan, the Lung Association has called for analyzing targets following the more ambitious scenarios presented within the Scoping Plan drafts, which ranged from 18 -25 percent reduction by 2030. We do not believe that an 18 percent reduction in carbon intensity adequately responds to the urgency of climate change impacts to public health and urge the staff to evaluate a stronger goal through this rulemaking. Coupled with a projected shortfall in achieving 1.5 million ZEVs by 2025, we believe more certainty within the LCFS to achieve

California Region
1531 I Street, Suite 201 | Sacramento, CA 95814
Ph: 916-554-5864 cainfo@Lung.org

greater transportation carbon reductions is critical, along with stronger ZEV and vehicle miles traveled goals.

Updated carbon intensity values of fuel pathways – the Lung Association supports ARB's commitment to following the best science available on the carbon intensity of fuels as critical to the ongoing success of the program. We support evaluation of pathways and adjustments to the intensity values on a regular basis, and appreciate CARB's proposals to update the analytical tools needed to carry out this effort.

Development of new zero emission electricity pathways utilizing renewable power – as California moves to expand its commitment to Zero Emission Vehicles and renewable energy, it is critical that the LCFS more clearly recognizes the carbon benefits of these pathways. With the draft 2030 Scoping Plan, CARB staff projects over 4 million ZEVs and at least 50 percent renewable energy by 2030. Given this, we support CARB's inclusion of updated California-specific grid information, as well as renewable energy and renewable hydrogen pathways for zero emission vehicle fuels. Carefully designed verification of renewable energy delivery and use, whether generated on-site or off-site for electric vehicle charging, should guide the crediting for any new, additional renewable energy crediting under this proposal. We look forward to the ongoing dialogue among stakeholders to ensure more widespread renewable electricity for charging is supported and properly credited under the LCFS.

Updated energy efficiency ratios for zero emission trucks and buses – the Lung Association supports widespread deployment of zero emission technologies in the heavy duty sector as a top priority for cleaning up the air for all Californians, and especially those living near major pollution hubs. We applaud the efforts of CARB and stakeholders in the zero emission technology field for continued testing and demonstration of zero emission technologies in the heavier duty vehicle segments and encourage the updates to the LCFS to include more accurate reflection of the benefits of zero emission technologies, expanding the scope of energy efficiency ratios beyond trucks to include airport equipment and truck stop electrification, as well as more specific calculations for hydrogen fuel cell transit buses.

Inclusion of Alternative Jet Fuel – we believe that California can provide important leadership by including opportunities for lower carbon jet fuels within the LCFS. The encouragement of more alternative fuels in this segment is worthy of exploration and continued discussion within the LCFS rulemaking and supports early actions being taken in the industry to achieve lower carbon consumer services.

Environmental Analysis beneficial impacts of non-combustion fuels – the Lung Association has long supported the inclusion of a positive public health and environmental impacts within rulemaking analyses undertaken by ARB. We appreciate the workshop presentation including reference to benefits being included within the Environmental Analysis and we encourage focused attention on public health protections generated by the broader shift away from combustion technologies to zero emission pathways for both light duty and heavy duty applications noted above.

We believe that these changes advance the program's public health benefit and provide a stronger signal in the zero emission technology segments to provide the greatest level of protection for local communities most impacted by fossil fuels in the transportation sector.

Sincerely,

Bonnie Holmes-Gen
Senior Policy Director, Air Quality and Climate Change