



*Climate Neutral for a Healthy, Prosperous Menlo Park*

November 17, 2017

Sam Wade  
Fuels Division Manager California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Dear Mr. Wade,

Menlo Spark would like to endorse the comments submitted by the Smart EV Charging Group on the California Air Resources Board (ARB) Pre-Rulemaking on Low Carbon Fuel Standard (LCFS) submitted on September 5, 2017 and October 6, 2017.

Menlo Spark is an independent nonprofit working to help Menlo Park become climate neutral by 2025, as we advance community prosperity, economic vitality, and strong civic heritage. We are interested in promoting regional sustainability, including partnering with our local energy providers to support additional EV charging infrastructure and advancing the penetration of electric vehicles in the local fleet.

Reducing the environmental impact of transportation systems is a central goal of our organization and a central component of California's decarbonization efforts. The proposal submitted by the Smart EV Charging Group would support the accelerated transition to the low-GHG transportation future we envision by increasing the charging sources with low or no emissions intensity.

Lowering the emissions associated with charging through cleaner generation sources like Peninsula Clean Energy's ECOplus (80% GHG free) and ECO100 (100% GHG free), on-site generation of renewables, and/or charging during times of the day and year when clean generation is abundant are all effective means to achieve this. It is our understanding that the comments of the Smart EV Charging Group provide staff with detailed recommendations concerning changes to current regulations that are needed to support these three aspects of promoting charging. It is important to consider and accurately account for cleaner generation sources than are currently represented within the regulations. We support those recommendations and request that staff include them within the suite of reforms being contemplated for the LCFS.

We're grateful for ARB's leadership on this important issue and encourage you to enable counties like ours to help further contribute to the State's ambitious climate goals.

Sincerely,

Diane Bailey  
Executive Director, Menlo Spark