

Comment 1 for Low Carbon Fuel Standard Program Review Advisory Panel (lcfspanel2014-ws) - 1st Workshop.

First Name: Alex
Last Name: Menotti
Email Address: amenotti@airlines.org
Affiliation: Airlines for America

Subject: LCFS Advisory Panel Public Comment Question-Inclusion of Jet Fuel and Low CI Renewable Die
Comment:

A4A writes to request that the LCFS Advisory Panel consider the inclusion of sustainable alternative jet fuel as an eligible credit-generating fuel as part of its review of the LCFS program, even though it would not be subject to the LCFS mandate, consistent with EPA's approach under the Renewable Fuel Standard. As further detailed in the attached letter that A4A submitted to CARB in July 2014, which we ask be included in the record for today's meeting, the omission of alternative jet fuel as an eligible credit-generating fuel is a substantial disincentive to the production of alternative jet fuel in the California market and beyond.

With regard to the panel's discussion of fuel availability, much of the volume of renewable diesel that CARB anticipates will be available for LCFS compliance has already been contractually committed to the production of renewable jet fuel. This includes production from AltAir fuels and recently announced production at Fulcrum Bioenergy and Red Rock Biofuels under the Defense Production Act. CARB should not distort the market for alternative fuels by seeking to attract LCFS-eligible renewable diesel from these facilities for LCFS compliance. Instead, CARB should allow for credit generation from either renewable diesel or jet fuel and allow market participants to determine where the fuel is ultimately allocated. Such an approach would lend more certainty to CARB's low CI fuel availability projections and eliminate concerns that the LCFS may inhibit alternative jet fuel production.

Numerous stakeholders have urged CARB to allow for alternative jet fuel to generate credits under the LCFS in order to increase compliance flexibility and eliminate distortions in the alternative fuels market. CARB stated in the Final Statement of Reasons of the 2009 regulation that it would revisit the issue in the 2011 Advisory Panel review process. Unfortunately, the issue was not addressed in the 2011 report. We strongly urge the Advisory Panel to address the issue in the current review and recommend the adoption of amendments that would allow for alternative jet fuel to generate credits under the LCFS.

Sincerely,

Alex Menotti
Environmental Affairs Regulatory Manager
Airlines for America®
We Connect the World
1301 Pennsylvania Ave, NW, Suite 1100
Washington, DC 20004
Phone: (202) 626-4151
Fax: (202) 626-4139
email: amenotti@airlines.org

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-lcfspanel2014-ws-WzpSYABgBAGebgls.pdf>

Original File Name: A4A letter to CARB re jet fuel and LCFS 7 15 14.pdf

Date and Time Comment Was Submitted: 2014-10-06 11:36:42

No Duplicates.

There are no comments posted to Low Carbon Fuel Standard Program Review Advisory Panel (lcfspanel2014-ws) that were presented during the Workshop at this time.