



March 15, 2023

Via Electronic Submission

Dr. Steve Cliff
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA

Re: Low Carbon Fuel Standard

Dear Mr. Cliff:

On behalf of the undersigned members of the Los Angeles County Electric Truck and Bus Coalition, we provide comments on the Low Carbon Fuel Standard (LCFS) Amendments being proposed. The LCFS is supposed to address greenhouse emissions from burning transportation fuels in California. But, the vast majority of funds from the program go to support combustible fuels. This runs counter to what Los Angeles County needs to ensure safe air. Our recent air plan for the region confirmed we must go to zero-emissions everywhere possible to meet ambient air quality standards. If the LCFS program is providing an incentive for combustible fuels on the order of billions of dollars **every year**, it is running at cross purposes to our efforts to electrify transportation and meet clean air standards in the region. Moreover, the glut of credits – many coming from out of state projects that provide little job benefits to Californians – are not ensuring we improve our economy. California should define what it wants with this program – e.g. the vast deployment of zero-emissions vehicles – and just work backwards to achieve that.

I. We Must Provide More Support for Transportation Electrification.

One of California's central greenhouse gas transportation programs, the LCFS, needs to more fully focus on zero-emissions to attain air quality standards, reduce climate pollution, and protect communities from localized air pollution. Every year, there are \$3 billion or more in credits under California's LCFS program, making it one of the largest "clean" transportation investment programs in California. But, the vast majority of these funds go to support combustible fuels despite the fact that California [firmsly acknowledges](#) that meeting both its climate goals and achieving safe air standards requires a wholesale shift to zero-emissions in the transportation sector. Specifically, roughly **80% of the money (approximately \$2.4 billion)** from the LCFS program has gone to biofuels that end up burned in combustion engines.

The Los Angeles County Electric Truck and Bus Coalition brings together leading voices from clean energy, organized labor, environment, and neighborhood community groups to build a broad movement that supports a 100% electric fleet for Los Angeles County. Our members include Earthjustice, Food and Water Action, IBEW Local 11 and NECA Los Angeles, Jobs to Move America, and Sierra Club.



Subsidizing fuels for combustion engines undermines California's transition to zero-emission cars, trucks and buses. California needs to work backwards where 80% or more of the funds go to support zero-emission transportation in California. This is especially important with the Governor proposing budget cuts to California's ZEV programs (to the tune of [\\$3 billion](#)). This creates even more urgency to modernize the LCFS program and make up for some of that lost ground. Even in a tight budget, the LCFS program is one place where the California can direct fixes that can have lasting, annual investments to support transportation electrification. We recognize that a debate about the nuances of the market may be an interesting academic debate, but we just need California to have a program that pours billions of dollars into zero-emissions in Los Angeles County and other polluted parts of the State.

With the right fixes, a modernized LCFS could unleash broader and faster EV adoption across California.

II. The LCFS Program Should Also Be Amended to Ensure Proper Training for Charging Station Installation.

As we shift to zero-emissions transportation, it is vital we ensure jobs are done with appropriately trained electrician and other contractors. Thus, we recommend attaching the following language into the program:

Electric vehicle charging infrastructure funded by moneys derived from credits generated from the Low Carbon Fuel Standard shall; 1) be installed by a contractor with the appropriate license classification, as determined by the Contractors' State License Board, and at least one electrician on each crew, at any given time, holds an Electric Vehicle Infrastructure Training Program certification, and 2) meet a requirement that at least 25 percent of the total electricians working on an electric vehicle infrastructure project installing a charging port supplying 25 kW or more, at any given time, hold Electric Vehicle Infrastructure Training Program certification. One member of each crew may be both the contractor and an Electric Vehicle Infrastructure Training Program certified general electrician.

We look forward to working with the CARB to advance more electric school buses in Los Angeles County.

Sincerely,

A handwritten signature in black ink that reads "Adrian Martinez".

Adrian Martinez
Earthjustice

The Los Angeles County Electric Truck and Bus Coalition brings together leading voices from clean energy, organized labor, environment, and neighborhood community groups to build a broad movement that supports a 100% electric fleet for Los Angeles County. Our members include Earthjustice, Food and Water Action, IBEW Local 11 and NECA Los Angeles, Jobs to Move America, and Sierra Club.



Joe Sullivan

Labor Management Cooperation Committee IBEW local 11

& NECA California and National Electrical Contractors Association Los Angeles

Hector Huezo

Jobs to Move America

Yassi Kavezade

Sierra Club

The Los Angeles County Electric Truck and Bus Coalition brings together leading voices from clean energy, organized labor, environment, and neighborhood community groups to build a broad movement that supports a 100% electric fleet for Los Angeles County. Our members include Earthjustice, Food and Water Action, IBEW Local 11 and NECA Los Angeles, Jobs to Move America, and Sierra Club.