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COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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IN REPLY PLEASE

REFER TO FILE: **EP-4**

October 17, 2016

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

FISCAL YEAR 2016-17 FUNDING PLAN FOR LOW CARBON TRANSPORTATION AND FUELS INVESTMENTS AND THE AIR QUALITY IMPROVEMENT PROGRAM

The County of Los Angeles Department of Public Works (Public Works) would like to express our appreciation to the Air Resources Board (ARB) for providing the opportunity to comment on the Fiscal Year (FY) 2016-17 Funding Plan for Low Carbon Transportation and Fuels Investments and the Air Quality Improvement Program. Public Works supports ARB's efforts to promote the development of low carbon transportation and fuels in the State in order to reduce greenhouse gas (GHG) emissions and help achieve the goals established by Assembly Bill 32 (AB 32) and Senate Bill 32 (SB 32).


Public Works appreciates that for FY 2016-17, ARB planned to allocate funding for a Very Low Carbon Fuel Production Incentive Project, since fuels have previously not been included in ARB's Low Carbon Transportation Program. Unfortunately, the Legislature approved Assembly Bill 1613 (AB 1613) which appropriates only \$363 million to ARB for Low Carbon Transportation Projects, less than the \$500 million in Low Carbon Transportation and Fuels funds for ARB in the Governor's Budget proposal. ARB staff's proposed modifications to the FY 2016-17 Funding Plan reduce the allocation for a Very Low Carbon Fuels Production Incentive Project from \$40 million to \$0. Funding for various zero-emission vehicle (ZEV) projects totals \$65 million and is not reduced in ARB staff's proposed modifications. We recommend that the funding allocation for a Very Low Carbon Fuels Production Incentive Project be increased, since the development of biofuels is critical to meeting the SB 32 GHG emission reduction target. We believe that the use of ZEVs should not be prioritized over the use of biofuels, since ZEVs also have upstream GHG emissions and biofuels can be produced with a negative carbon intensity.

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Thank you for your consideration of these comments. If there are any questions regarding these comments, please contact Mr. Carlos Ruiz at caruiz@dpw.lacounty.gov or at (626) 458-3501.

Very truly yours,

GAIL FARBER
Director of Public Works


for DANIEL J. LAFFERTY
Assistant Deputy Director
Environmental Programs Division

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