



San Francisco International Airport

18-3-3
E. Cooke

April 27, 2018

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

Re: Comments of San Francisco International Airport on the Proposed Amendments to the Low Carbon Fuel Standard

Dear Mr. Wade:

San Francisco International Airport (“SFO”) appreciates the opportunity to demonstrate support for the inclusion of alternative jet fuel (“AJF”) on an opt-in basis through proposed amendments to the Low Carbon Fuel Standard (“LCFS”) currently under consideration by the California Air Resources Board (“ARB”).

SFO is actively exploring options for future delivery of AJF to meet the demand of our airline partners and achieve our five-year Strategic Plan goal of carbon neutrality by 2021.

The proposed expansion of the ARB’s market-based credit program will help the commercial aviation sector access low-carbon fuels. SFO believes cost-competitive AJF provides a real opportunity to reduce carbon and other emissions, hedge against business risk from forecasted fuel supply scarcity, as well as provide a healthier local environment for our workforce. We also recognize how critical the LCFS is to draw AJF industries to California to enable airports to attain these benefits. AJF is currently produced in very limited supply and is utilized most effectively where it is cost competitive with conventional jet fuel.

The current market for AJF is only around 20 million gallons produced globally, and may not be able to respond to demand as quickly as ARB anticipates. AJF producers need to maximize credit generation potential to make this an effective market. SFO encourages ARB staff in finalizing the technical details of the LCFS amendments to work with the airlines, AJF producers, and their industry associations to develop a value for the LCFS credits that will result in meaningful adoption and scale-up of these important low-carbon fuels.

SFO serves over 56 million passengers annually and has seen over five percent growth each year, elevating the need for a successful AJF industry to help SFO and our airline partners cut carbon. To prepare for robust AJF growth and adoption, SFO hosted AJF delivery to Singapore Air flights in May 2017, and followed up with an AJF scoping workshop in August with nearly 60 stakeholders, including AJF producers, conventional jet fuel suppliers, and airport fuel providers; state and local government agencies; airport finance, policy, planning and operations personnel; airlines; and various non-governmental organizations.

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

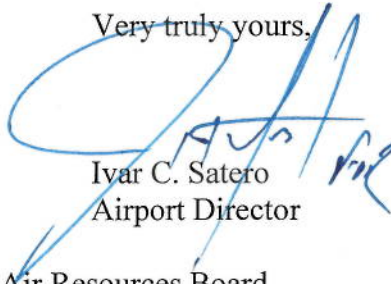
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SFO is also commissioning a feasibility study to explore AJF production, delivery, and storage pathways to enable fuel suppliers and buyers to accept AJF deliveries at our facilities. There is immense interest in AJF, and the proposed LCFS amendments would help surmount the high adoption hurdles.

We thank ARB for its continued efforts to decarbonize California's fuel supply and urge the Board to adopt the proposed amendments to the LCFS that include AJF as an opt-in fuel starting January 1, 2019.

Very truly yours,



Ivar C. Satero
Airport Director

cc: Richard Corey, California Air Resources Board