July 2, 2018

Sam Wade, Branch Chief

Transportation Fuels Branch

California Air Resources Board

1001 I Street

Sacramento, CA 95814

**Re: The addition of alternative jet fuels (AJF) as opt-in credit-generating biofuels**

Dear Mr. Wade:

On behalf of United Airlines, this letter is to express our strong support for inclusion of alternative jet fuel (AJF) within the Low Carbon Fuel Standard (LCFS), as proposed in your Final Proposed Modifications document released June 20, 2018. As you know well, United has strongly supported inclusion of AJF in the LCFS.

Specifically, we greatly appreciate your attention to the carbon intensity (CI) benchmark for conventional jet fuel, and your adoption of a static baseline for conventional jet fuel until 2023, at which point it will be adjusted in parity with the diesel baseline. As we noted and you acknowledged, this change would avoid having AJF continue to be disincentivized despite being included in the LCFS.

Your attention to this matter, and your staff’s work to resolve this issue has been most welcome. The benchmark set forth in your most recent document release better reflects the true CI of conventional jet fuel, while also balancing your policy needs for AJF not having a greater LCFS credit than renewable diesel.

As currently proposed, the CI score and the resulting credits allowed for AJF will help incentivize production and contribute to greater use of the alternative fuel. United Airlines is grateful for your work and your efforts on this matter.

Sincerely,

/s/ Aaron Robinson