



November 5, 2020

Rajinder Sahota
Division Chief, Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Arpit Soni
Manager, Alternative Fuels Section
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Inclusion of Airport Electric Airside Equipment in LCFS Regulatory Update

Dear Ms. Sahota and Mr. Soni:

On behalf of the California Airports Council (CAC), I write to encourage the consideration of including electric airside equipment in the Low Carbon Fuel Standard (LCFS) Program. The CAC is comprised of the 31 commercial service airports in the state, which includes eleven of the nation's top 100 busiest primary airports. California airports have, and continue to be, committed environmental stewards pursuing emission reduction strategies that support cleaner operations both at the state and national level. As CARB considers amendments to the LCFS program, airports are advocating for a significant opportunity to be reviewed that would encourage electrification of airside operations through adding electric airside equipment to the program.

In the most recent regulatory update of the LCFS program, airport ground support equipment was not incorporated, however, flexibility was provided to allow CARB staff the discretion to enter new equipment through the Tier 2 Pathway (Guidance 20-04). Airports across the state have worked collaboratively to review the guidance document and are currently in the process of developing EER values to be reviewed by CARB staff for electric airside equipment such as eGSE, Pre-Conditioned Air, and Ground Power Units. This is an important and voluntary undertaking for airports as there are limited funding opportunities available on the state level to support the transition to electric airside equipment. According to CARB's Draft 2020 Mobile Source Strategy, "approximately 34 percent of GSE reported to CARB is electric, with 38 percent being diesel, 17 percent gasoline, and 11 percent being natural gas". As such, there is still

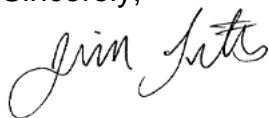
significant advancement to be made toward electrification, but airports need to have resources available to back infrastructure purchase and installation as a foundation.

Funding through the LCFS program could help with this effort, and although airports are currently seeking entrance through the Tier 2 Pathway, it would be beneficial for the equipment and agreed upon EERs to be included in the next official rulemaking. The Tier 2 application process may not be feasible for airports without access to environmental staff or consultants to develop adjusted carbon intensity-EERs, also, they may be limited in additional funding available to perform annual testing and/or certification processes required for Tier 1&2 pathways.

Additionally, airports operate in a unique environment in which they are federally regulated yet typically owned by local municipalities. Most mobile sources operating on airports are owned by third-party tenants – this includes airport ground support equipment (GSE) which is typically under the ownership of airlines. The primary distinction is that in many cases, airports are responsible for the fuel supply equipment (FSE) i.e. electrical distribution lines and chargers. In addition to adding electric airside equipment to the program, it would be helpful to clarify ownership of generated credits. For other equipment, such as shorepower, cargo handling equipment and landside light-duty vehicle operations, CARB has defined the credit generator as the owner of the FSE. Airports agree with this determination and would like to see this clearly outlined for the aviation sector considering the distinctions in equipment ownership.

We greatly appreciate the chance to comment on this concept and we would appreciate additional opportunity to strategize at future policy workshops as the CAC welcomes further discussions that create a permanent structure for the inclusion of electric airside equipment in the LCFS Program. If you have questions or comments about the CAC's proposed concept, please do not hesitate to reach out to Sarah Johnson at sjohnson@calstrat.com for further discussion.

Sincerely,

A handwritten signature in cursive script that reads "Jim Lites".

Jim Lites
Executive Director