



October 16, 2024

Honorable Chair Liane Randolph and Honorable Board Members
California Air Resources Board
1001 I Street Sacramento, CA 95814

Subject: Support for California Air Resource Board's Low Carbon Fuel Standard Regulation

Dear Chair Randolph and Honorable Board Members,

On behalf of the Los Angeles Cleantech Incubator (LACI), I am writing in support of the California Air Resources Board's (CARB) Low Carbon Fuel Standard as a critical tool to advance the state's transition to zero emission vehicles (ZEVs) across the light, medium, and heavy-duty sectors. Since its creation ten years ago, the LCFS has spurred momentum towards the state's climate goals, as well as Los Angeles' regional goals, reducing greenhouse gas emissions and other air pollutants that disproportionately impact low-income and disadvantaged communities, and the program is needed to continue to advance electric vehicle adoption.

LACI convenes the Transportation Electrification Partnership (TEP), an unprecedented multi-year, multi-sectoral partnership focused on accelerating transportation electrification in the greater Los Angeles region by 2028, when the world turns its attention to our region as the host of the Olympic and Paralympic Games. The Partnership's 25+ members represent a range of stakeholders including local, regional and state government, regulators, utilities, industry leaders, labor organizations and startups. In our [Zero Emission 2028 Roadmap](#), the Partnership set ambitious, but achievable targets for light-duty, medium-duty and heavy-duty ZEV sales as well as charging infrastructure installations to be achieved in LA County by 2028, including:

- 30% of light-duty vehicles on the road and 80% of vehicle sales to be electric, with 129,000 public and workplace chargers to support these vehicles,
- 20% of single occupancy vehicle trips shifted to zero emission public and active transportation,
- 60% of all medium-duty delivery vehicles to be electric, 40% of drayage trucks to be zero emission, and up to 95,000 charging stations deployed to support for goods movement.

The LCFS program provides a stable source of funding and regulatory support to achieve these goals while growing the green economy in Los Angeles and beyond. It has also served as a key market signal for billions of dollars of investments in zero emission vehicles and infrastructure and will continue to attract large amounts of private capital to the state.

CARB's Advanced Clean Cars II, Advanced Clean Fleets, and Advanced Clean Trucks rules are spurring zero emission vehicle adoption; extending and strengthening the LCFS program will continue to provide essential support to meet the targets laid out in the regulations. As such, we applaud CARB's proposed 30% reduction in fuel carbon intensity (CI) by 2030 and 90% reduction in fuel CI by 2045, as a means of aligning with greenhouse gas emission caps under SB 32 and AB 1279. Further, the proposed amendments that expand the current ZEV infrastructure crediting provisions beyond light-duty infrastructure to medium- and heavy-duty infrastructure, while extending the light-duty crediting with an emphasis on equity will help reduce the risk of under-utilized chargers and drive the buildout of necessary infrastructure.

For these reasons, LACI strongly supports extending and strengthening LCFS to keep the Los Angeles region and California on track to reach our climate targets and ensure the equitable adoption of ZEVs for all. Please do not hesitate to reach out if you have any questions.

Best,

A handwritten signature in black ink, appearing to read "Michelle Kinman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michelle Kinman
Senior Vice President, Market Transformation
Los Angeles Cleantech Incubator