

*[Letter submitted electronically as LCFS Public Workshop comment]*

November 5, 2020

Richard Corey  
Executive Officer

Rajinder Sahota  
Industrial Strategies Division Chief

California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**RE: Request to Address Alternative Jet Fuel Crediting in LCFS Rulemaking**

Mr. Corey & Mr. Sahota,

This letter is submitted on behalf of the San Diego County Regional Airport Authority (Airport Authority), which operates the San Diego International Airport (SAN) and is responsible for long-term air transportation planning in the San Diego region. The Airport Authority has prioritized greenhouse gas emission reductions as part of its broader sustainability commitments, by investing in the construction of high-performing energy efficient facilities, conversion to electric-powered vehicles and equipment, installation of 5.5 MW of onsite solar power, and expansion of public transit connections to the Airport. These efforts have helped SAN become one of only two airports in North America to achieve “carbon neutrality” status through Airport Council International’s Airport Carbon Accreditation program.

Aircraft though remain the largest source (approximately 65%) of carbon emissions associated with SAN’s operations. As such, the Airport Authority greatly appreciates the California Air Resources Board’s formal inclusion of alternative jet fuel<sup>1</sup> (AJF) into the Low Carbon Fuel Standard (LCFS) last year on an opt-in basis. AJF is now successfully being commercialized in California, but volumes are currently small, especially when compared to other biofuels used in the state. One of the key factors limiting AJF use is the total LCFS

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<sup>1</sup> The LCFS defines the term “Alternative Jet Fuel” at 17 CCR §95481(a)(6) to mean: “a drop-in fuel, made from petroleum or non-petroleum sources, which can be blended and used with conventional petroleum jet fuels without the need to modify aircraft engines and existing fuel distribution infrastructure.” While there are nuanced distinctions between the LCFS defined term “alternative jet fuel” and “sustainable aviation fuel,” this comment letter uses the terms interchangeably.

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value that AJF producers receive, when compared to producers of on-road alternative fuels, such as renewable diesel.

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Therefore, the Airport Authority respectfully requests that the California Air Resources Board address this disparity of LCFS credit policies, as part of its upcoming rulemaking process. This will send needed price signals to fuel producers, encouraging them to expand their facilities and increase available supply of AJF to airlines and California airports. In addition to the environmental benefits, this LCFS policy change would help economically position California as a leading AJF supplier in the growing world market.

Thank you for your time and consideration. If you have any questions about this comment letter or the Airport Authority's carbon reduction initiatives, please feel free to contact me at [breed@san.org](mailto:breed@san.org) or 619-400-2785.

Sincerely,



**Brendan J. Reed**

Director of Planning & Environmental Affairs

cc: Michelle Brega, Senior Director of External Relations, Airport Authority  
Matt Harris, Director of Government Relations, Airport Authority