

February 20, 2024

California Air Resources Board
1001 I Street Sacramento, CA 95814

RE: Support for LCFS inclusion of jet fuel; suggestions for aligning with British Columbia's approach

Dear California Air Resources Board,

Advanced Biofuels Canada is the Canadian national trade association for advanced biofuels and renewable synthetic fuels. ABFC members produce a portfolio of liquid low-carbon fuels (including alternative jet fuels), sustainable feedstocks, and intermediary products. Our members operate over 34 billion litres of low carbon fuel production capacity globally and are significant suppliers to renewable and low carbon fuel regulations in Canada, the US, and worldwide. Many of our members have operations in both the United States and Canada.

Regarding the subject consultation:

ABFC is strongly supportive of CARB's proposal to remove the exemption for intrastate fossil jet fuel use under the LCFS. Including intrastate jet fuel as a debit-generating fuel under the regulation is an important step towards encouraging more Alternative Jet Fuel (AJF) use in California.

ABFC suggests that California expand its ambition towards jet fuel and, to the extent possible, align with the approach enacted in British Columbia that (1) obligates all jet fuel sold under the regulation, (2) prescribes minimum volumetric AJF use requirements, and (3) prescribes carbon intensity (CI) reduction requirements for jet fuel.

The British Columbia regulations containing the jet fuel requirements are located here: [Order in Council 699/2023 \(gov.bc.ca\)](https://www2.gov.bc.ca/gov2/order_in_council/699/2023)

To summarize, British Columbia's updated LCFS statute:

- Was approved on December 11, 2023 and enacted on January 1, 2024.
- Requires 1% AJF by volume in 2028, 2% in 2029, 3% in 2030.
- Requires a 2% CI reduction from a fossil jet baseline of 88.83 gCO₂e/MJ in 2026, 4% in 2027, 6% in 2028, 8% in 2029, and 10% in 2030.

We note that the CI reduction requirements for jet fuel are lower than that of gasoline and diesel fuels. Gasoline has a 5% renewable content requirement and a 30% CI reduction requirement by 2030 (below 2010 levels); diesel has a 4% renewable content requirement and is subject to the same 30% CI reduction requirement by 2030. (We note that the CI reduction requirements for any fuel can be met by overcompliance in other fuel types).

Addressing aviation emissions should be a strong area of regional collaboration under the Pacific Coast Collaborative. ABFC recognizes that California and British Columbia are members of the Pacific Coast Collaborative¹ and are leading LCFS jurisdictions in North America. Aligning on clear and stringent approaches to addressing emissions from petroleum jet fuel is an opportune area of continued policy collaboration.

Thank you for this opportunity to provide comments.

Yours truly,

Advanced Biofuels Canada

¹ The Pacific Coast Collaborative, British Columbia, Washington, Oregon, California, and the cities of Vancouver, Seattle, Portland, San Francisco, Oakland, and Los Angeles are working together to build the low carbon economy of the future. We share ambitious goals for reducing greenhouse gas emissions at least 80 percent by 2050.

By connecting jurisdictions at the regional level – and connecting states and provinces with cities in the region – the Pacific Coast Collaborative (PCC) facilitates collaboration on issues that cross borders and jurisdictional boundaries, such as grid integration, a comprehensive electric vehicle charging network, and responding to ocean acidification. We pool policy and technical expertise, share strategies to curb greenhouse gas emissions while growing the economy, and work together to implement them. (Accessed at: pacificcoastcollaborative.org/)