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February 20, 2024

California Air Resources Board
1001 Street
Sacramento, CA, 95814

Subject: Concerns on the proposed Low Carbon Fuel Standards Rulemaking

Dear Members of the California Air Resources Board:

On behalf of the California State Association of Counties (CSAC), representing all 58 counties in the state, I write to express concerns on the regulatory proposal by the California Air Resources Board (CARB) to regulate jet fuel under the Low Carbon Fuel Standard (LCFS) program.

CSAC is committed to environmental stewardship and recognizes airports' critical role in a balanced transportation system. We are proud of our county airports' advances towards reducing their carbon emissions. Although we recognize how these proposed regulations support the State's broader goals for sustainability and environmental protection, the proposal to regulate jet fuel usage presents several challenges that could disproportionately affect county airports. Many county airports are not equipped with the infrastructure necessary for Sustainable Aviation Fuel (SAF) and Jet A blending, nor do they have the financial resources to undertake such significant upgrades. Implementing these upgrades will negatively impact their operations and services, exposing them to be in violation of federally mandated grant assurances and Federal Aviation Administration (FAA) policy.

We recognize and appreciate California's leadership in adopting SAF. However, we are concerned that the proposed regulations do not account for the significant infrastructure upgrades required for SAF and Jet A blending, particularly at general aviation airports. The logistics of transportation and storage for SAF, which differ from conventional jet fuel, pose additional challenges. Implementing this proposal could impose substantial operational burdens on county airports, potentially disrupting the progress toward our state's sustainable aviation future.

County airports play a vital role in the state transportation system and support numerous ancillary industries, it is imperative to consider the operational implications of this regulation carefully, not to mention the risk of losing federal entitlement monies by being in violation of federal grant assurance policies. We must avoid creating an aviation environment within our State where regulatory compliance costs undermine the viability of county airports. County airports are a vital part of the transportation system and delivery of emergency fire services in communities across California.

We urge CARB to reconsider this proposal, given the unique circumstances of county general aviation airports. Instead of a one-size-fits-all approach, we advocate for a strategy that includes grants for infrastructure upgrades and a phased implementation plan that allows county airports

to transition to SAF usage without compromising their federal obligations and operational or financial stability.

In conclusion, we respectfully request that CARB preserve the existing opt-in approach for SAF, collaborate with county airports to address the complexities of SAF integration and focus on realistic policies that facilitate a smooth transition to a greener aviation future in California.

Thank you for your attention to this critical matter.

Sincerely,

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

Mark Neuberger
Legislative Advocate
California State Association of Counties