August 27, 2024

California Air Resources Board

P.O. Box 2815

Sacramento, CA 95812

[submitted electronically]

**RE: Joby Aviation Comments on the Low Carbon Fuel Standard’s August 2024 15-Day Comment Period**

Joby Aviation[[1]](#footnote-1) (Joby) appreciates the opportunity to submit comments to the California Air Resources Board (CARB) on the 15-Day Changes released on August 12, 2024.

Joby's mission is to help the world connect faster and more easily with the people and places that matter most by delivering a new form of clean, quiet, electric vertical take-off and landing (eVTOL) aerial transportation. Building on recent advancements in energy storage, microelectronics, material science, and software, we are developing an all-electric aircraft with zero operating emissions that will transport a pilot and four passengers at speeds of up to 200 mph, while also having the ability to take off and land vertically.

Joby is headquartered in Santa Cruz, California, with over 1,400 employees across the state. In 2022, we completed the construction of our pilot production lines in San Carlos and Marina, California, and we began manufacturing our production prototype aircraft. We are excited to support the clean transportation and climate goals of our home state.

As expressed in our comments submitted in response to the April 10 LCFS Workshop, Joby believes CARB can be instrumental in helping California unlock zero-emission and sustainable aviation technologies and fuels.[[2]](#footnote-2) This includes the LCFS, which will play an important role in incentivizing a less carbon-intensive aviation industry. To do so, CARB should not only seek to streamline the participation of the aviation sector in the LCFS but also initiate a rulemaking process to implement its aviation goals.

**Joby Supports the Increased Stringency Proposed in the 15-Day Comment Period**

First and foremost, Joby supports increasing the carbon intensity (CI) reduction target of the LCFS program. As expressed in our previous comments, a more ambitious initial step-down – when paired with the “auto-acceleration mechanism” – will help to expedite investments in low-carbon fuels and serve to maximize California's potential for emissions reduction in the transportation sector.[[3]](#footnote-3) Therefore, Joby is appreciative of the proposed near-term increase in stringency to a 9% CI reduction in 2025 in the 15-Day Changes.[[4]](#footnote-4) This increased stringency aligns with the 2022 Scoping Plan Update, which finds that the aviation sector holds an important role in California's ambitious journey toward carbon neutrality by 2045.[[5]](#footnote-5)

**Joby Encourages Explicit Inclusion of Electric and Hydrogen Aviation for Capacity Credits**

As expressed in our previous comments, Joby is supportive of the hydrogen refueling provisions and their inclusion of both private and public infrastructure.[[6]](#footnote-6) While the hydrogen refueling station pathways proposed in the 15-day changes are to be grouped in a new manner – one category for light- and medium-duty (LMD-HRI) hydrogen refueling stations and a separate one for heavy-duty (HD-HRI) – Joby nevertheless believes it is imperative that electric and hydrogen aviation be explicitly included within the relevant definitions.

The inclusion of electric and hydrogen aviation will likely have national impacts given that California policy frameworks are often used as models for federal legislation. Specifically, California’s LCFS is often replicated by other states. To date, four states have adopted similar clean fuel programs and an additional eight states have pending policies.[[7]](#footnote-7) Therefore, the explicit inclusion of electric and hydrogen aviation can help set precedent for a cleaner aviation sector nationally.

**Conclusion**

In summary, Joby is appreciative of CARB’s continued work on the LCFS and looks forward to working with CARB on achieving California’s zero-emission aviation and larger climate goals.

Sincerely,

*/s/ George Kivork*

George Kivork

Head of U.S. State & Local Policy

Joby Aviation

1. See <https://www.jobyaviation.com/>. [↑](#footnote-ref-1)
2. Joby Aviation Comments in Response to April 10 Workshop. Available at:

<https://ww2.arb.ca.gov/form/public-comments/submissions/11311>. [↑](#footnote-ref-2)
3. Ibid. [↑](#footnote-ref-3)
4. <https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2024/lcfs2024/15day_notice.pdf> [↑](#footnote-ref-4)
5. CARB 2022 Scoping Plan at p.73. Available at: [https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf.](https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf)  [↑](#footnote-ref-5)
6. Joby Aviation Comments in Response to April 10 Workshop. [↑](#footnote-ref-6)
7. David M. McCullough, Matthew W. Morrison, Elorm K. Sallah, Steve R. Brenner, “Revving Up: Eight

States in Gear with Low-Carbon Fuel Standard Legislation,” April 2024. Available at:

<https://www.pillsburylaw.com/en/news-and-insights/eight-states-low-carbon-fuel-standard-legisl>

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[%20or%20regulations.](https://www.pillsburylaw.com/en/news-and-insights/eight-states-low-carbon-fuel-standard-legisl)  [↑](#footnote-ref-7)