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**August 27, 2024**

## **Comments to the California Air Resources Board Regarding 15-Day Changes in the Low Carbon Fuel Standard Rulemaking**

The San Francisco Public Utilities Commission (SFPUC), the San Francisco Municipal Transportation Agency (SFMTA), and the San Francisco International Airport (Airport) offer the following comment on the California Air Resources Board's (CARB) modifications to its Low Carbon Fuel Standard (LCFS) program proposed in the August 12, 2024 Notice of Public Availability of Modified Text and Availability of Additional Documents and/or Information ("15-Day Changes").

On page 6 of these 15-Day Changes, in the Summary of Proposed Modifications, CARB states:

In section 95486.1(a)(4), staff proposes to remove the pre-2011/post-2010 delineation for Fixed Guideway System crediting. This adjustment provides equal treatment to all fixed guideway systems for the purposes of LCFS crediting and improves LCFS support for transit services in California.

Specifically, this proposal would delete a short section in the existing regulation that restricts the application of an energy efficiency multiplier (Energy Economy Ratio or EER) to only those portions of Fixed Guideway (electric rail) Systems that began operations after 2010. By deleting this section, as CARB notes, the EER multiplier would apply to older systems as well as newer systems.

Our agencies strongly support this modification which we see as both technically accurate and policy that supports and incentivizes the continued use and maintenance of clean transit systems. Applying the EER multiplier to LCFS credit generation for pre-2011 systems will generate substantial additional revenue for transit operations throughout the state, in tangible alignment with several of CARB's priorities outlined in its 2022 Scoping Plan for Achieving Carbon Neutrality, including the need to reduce vehicle miles traveled through use of public mass transit.

The SFPUC, SFMTA, and Airport sincerely thank CARB staff for addressing comments from, and their time taken to meet with, transit providers and environmental groups advocating for this improvement to the regulation. Please contact the following staff with any questions.

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