



September 19, 2022

California Air Resources Board
1001 I Street
Sacramento, CA 95814

SUBJECT: Public Workshop to Discuss Potential Changes to Low Carbon Fuel Standard

To Whom it May Concern,

On behalf of CALSTART, I want to extend our appreciation for the opportunity to submit feedback regarding the potential changes to the Low Carbon Fuel Standard (LCFS) program. Since its initial implementation 2011, the LCFS program has allowed California to decrease carbon in our state's fuel pool and accelerated new technology and alternatives to petroleum fuel. The program has also served a valuable incentive program in helping bring new companies and their ideas for zero-emission fuels and technology into the state's fuel market.

CALSTART and our Origins

CALSTART is a California-based, international nonprofit that is a recognized clean transportation technology consortium. Our 300+ members are all dedicated to the growth of the clean transportation industry, and we work with public and private sectors to drive innovation in the sustainable transportation sector. CALSTART membership is comprised of vehicle manufacturers, transit agencies, public and private fleets, mobility partners, parts and component manufacturers, EV charging station and hydrogen refueling providers, battery manufacturers, and more.

Founded in Southern California in 1972, CALSTART has provided services and consulting to spur advanced transportation technologies, fuels, systems, and the companies that make them. Since our inception, CALSTART has partnered with California and several states to enact groundbreaking policies aimed at reducing and eliminating emissions from the transportation sector. We also administer several programs in California and across the country that help provide funding to fleets, companies, and manufacturers to help accelerate zero-emission vehicle adoption.

CALSTART's latest initiative, The Global Drive to Zero, has our staff working with foreign governments, sub-national governments, and industries to achieve a 100 percent zero-emission new truck and bus sales goal by 2040 with an interim 2030 mark of 30 percent zero-emission vehicles sales.

LCFS Past, Present, and Future

California's LCFS program is a model for other states in their efforts to curb the carbon intensity (CI) of transportation fuels. Currently, California's LCFS program is projected to decrease CI below the 20 percent goal by 2030.

CALSTART recommends CARB extend the LCFS program to 2045, with interim CI targets set up every five years (2035, 2040). This timeline matches up with the Governor's Executive Order (EO N-79-20) to turn over 100 percent of the truck fleets to zero-emission by 2045. That date also would incorporate programs like Advanced Clean Cars II, Advanced Clean Trucks, and Advanced Clean Fleets.

**Clean Transportation
Technologies and Solutions**

www.calstart.org

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For the near future, California should aim for the highest CI reduction target possible for 2030. Out of the options provided, CALSTART asks CARB to make Option B (30 percent CI reduction by 2030 compared to 2010) the goal.

In July, Governor Newsom wrote a letter to CARB Chair Randolph¹ pushing for “greater opportunities to reduce our dependence on fossil fuels to achieve our air quality and climate targets,” and continue the diversification of fuels away from petroleum in the transportation sector. Part of his ask was to evaluate and consider an increase in the stringency of the LCFS. With that said, CALSTART asks CARB to evaluate whether the 2030 goal can be even more aggressive than Option B and use 30 percent as the floor on what a strong and realistic CI reduction goal should be. CALSTART also encourages CARB staff to look at Oregon and their current proposals for CI reduction. A possible 2035 goal could be to align California and Oregon with 37 percent CI reduction.

Moving forward, CALSTART believes the setting of more stringent goals in 2030 and out years will send a strong signal to the marketplace and investors. A commitment to an increasingly more ambitious CI reduction would lead to more money entering the industry and helping California increase the clean fuel options available to customers.

Infrastructure Crediting into the Future:

CALSTART encourages CARB to expand capacity credits for Fast Charging Infrastructure (FCI) and Hydrogen Refueling Infrastructure (HRI). The medium- and heavy-duty (MHD) transportation sector disproportionately accounts for harmful emissions comparative to the number of vehicles they have on the road. CARB expanding credit pathways to support MHD trucks is a great opportunity to address high-emitting vehicles and incentivize more funding towards charging and refueling infrastructure.

A focus on MHD infrastructure is important given the need to get companies and fleets to transition to zero-emission. With potential regulations on the horizon for a full fleet transition, those looking to purchase a zero-emission truck need FCI and HRI options in place.

CALSTART encourages CARB to work with stakeholders regarding MHD public charging or public/private charging locations. These conversations are more important if the public, public/private charging location would be inclusive of light-duty (LD) in addition to MHD. Safety concerns, different infrastructure needs, and time of charge requirements are all elements needing to be addressed before construction on infrastructure begins so that the charging location can scale up as needed in the future.

CALSTART encourages CARB to work with stakeholders and manufacturers/operators regarding LD charging in multifamily units. Research in charging equity continue to show a lack of adequate charging infrastructure in multifamily locations. Consideration of reclassification from multifamily to non-residential for LCFS purposes has been a topic of discussion regarding how to incentivize more investments into charging installation and allow benefits to be received by early investing companies and operators who take larger risks with their investments.

¹ <https://www.gov.ca.gov/wp-content/uploads/2022/07/07.22.2022-Governors-Letter-to-CARB.pdf?emrc=1054d6>



Conclusion:

CALSTART appreciates the opportunity to submit public comment regarding several of the topics CARB is looking to address in their review of the LCFS program. Where we did not submit formal comments, we encourage CARB to engage with stakeholder and industry leaders and offer our services to arrange meetings for CARB staff.

The LCFS program continues to be one of the best drivers for reduction of carbon in fuel and opportunities to incentivize and promote investments in cleaner fuel and zero-emission infrastructure. The basis of the program should be adopted by other states in the country and CALSTART will continue to push for multi-state adoptions based on the successes of California's LCFS program.

Thank you for your time and consideration. Please feel free to reach out if there are any comments or questions.

Orville Thomas
State Policy Director
CALSTART