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September 16, 2019

Submitted electronically at:

[https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=tier2lcfspathways-
ws&comm_period=2](https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=tier2lcfspathways-
ws&comm_period=2)

Mr. Anil Prabhu
Manager, Fuels Evaluation Section
California Air Resources Board
Industrial Strategies Division
P.O. Box 2815
Sacramento, CA 95812

Re: Airlines for America Comments on the Proposed New Temporary Pathway for Alternative Jet Fuel

Dear Mr. Prabhu:

Airlines for America® (A4A), the principal trade and service organization of the U.S. airline industry,¹ appreciates the opportunity to comment on the California Air Resources Board's (CARB) proposed new Temporary fuel pathway for alternative jet fuel (AJF) under section 95488.9(b) of the Low Carbon Fuel Standard (LCFS) regulation.²

A4A and its member airlines supported CARB's inclusion of AJF as a credit-generating fuel under the LCFS on a voluntary, opt-in basis.³ We likewise support the proposed Temporary fuel pathway and associated carbon intensity (CI) values set forth in Table 1 of the CARB proposal, as such Temporary fuel pathways are critical to actualizing the inclusion of jet fuel under the LCFS and to support alternative jet production at an array of facilities. As CARB indicates, this new Temporary pathway and the CI values will be available for reporting by opt-in fuel reporting entities for the quarter in which certification of the pathway occurs.

Thank you for your consideration of these comments. Please do not hesitate to contact me if you have any questions.

Sincerely yours,

Nancy N. Young
Vice President, Environmental Affairs

¹ The members of A4A are as follows: Alaska Airlines, Inc.; American Airlines Group, Inc.; Atlas Air, Inc.; Federal Express Corporation; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada, Inc. is an associate member.

² https://www3.arb.ca.gov/fuels/lcfs/fuelpathways/comments/ajf_temp.pdf.

³ We incorporate our previous comments, "Comments on the 2018 Amendments to the Low Carbon Fuel Standard" (April 23, 2018), and "Airlines for America's Comments on Proposed Modifications to the Proposed Revisions to the Low Carbon Fuel Standard (LCFS) Regulation" (July 5, 2018), by reference here.