



**Airlines for America®**  
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August 20, 2021

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-<br/>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 July 30, 2021, Proposal to Update the  
Temporary Pathway for Alternative Jet Fuel

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Dear Mr. Prabhu:

Airlines for America® (A4A), the principal trade and service organization of the U.S. airline industry,<sup>1</sup> appreciates the opportunity to comment on the California Air Resources Board's (CARB) July 30, 2021, proposal to update the temporary fuel pathway for alternative jet fuel (AJF) under section 95488.9(b) of the Low Carbon Fuel Standard (LCFS) regulation.<sup>2</sup>

A4A and its member carriers supported CARB's inclusion of AJF as a credit-generating fuel under the LCFS on a voluntary, opt-in basis, as well as the original temporary fuel pathway and associated carbon intensity (CI) values that CARB proposed on July 31, 2019.<sup>3</sup> A4A likewise supports the updated pathway that CARB has now proposed. Broadening the temporary pathway by clarifying that the CI values apply not only to AJF produced from hydrotreating but also to AJF produced from other "fuel production technologies approved by the Executive Officer" (e.g., fluid catalytic cracking) is critical to enhancing the role of AJF under the LCFS and supporting AJF production from a wider array of production facilities.

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<sup>1</sup> A4A's members are: Alaska Airlines, Inc.; American Airlines Group Inc.; Atlas Air, Inc.; Delta Air Lines, Inc.; Federal Express Corporation; Hawaiian Airlines, Inc.; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada, Inc. is an associate member.

<sup>2</sup> See [https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/fuelpathways/comments/newtemp\\_ajfuel21.pdf](https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/fuelpathways/comments/newtemp_ajfuel21.pdf).

<sup>3</sup> We incorporate our previous comments, "Comments on the 2018 Amendments to the Low Carbon Fuel Standard" (April 23, 2018), "Airlines for America's Comments on Proposed Modifications to the Proposed Revisions to the Low Carbon Fuel Standard (LCFS) Regulation" (July 5, 2018), and "Airlines for America Comments on the Proposed New Temporary Pathway for Alternative Jet Fuel" (Sept. 16, 2019), by reference here.

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

Sincerely yours,

A handwritten signature in black ink that reads "Ira Dassa". The signature is written in a cursive, flowing style.

Ira Dassa  
Director, Environmental Affairs  
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[idassa@airlines.org](mailto:idassa@airlines.org)