



April 23, 2018

Mary Nichols, Chair  
 California Air Resources Board  
 1001 I Street  
 Sacramento, CA 95814

**Public Health Support for Stronger LCFS Target**

Dear Chair Nichols:

On behalf of the undersigned health and medical organizations and health professionals, we write to provide our strong support for CARB adopting the strongest possible Low Carbon Fuel

Standard target for 2030. We believe that the LCFS is a critical program driving down the harms to our air, our climate and communities most impacted by fossil fuels.

In large part due to the over-reliance on fossil-fueled transportation, California is home to the most difficult air pollution challenges in the United States. The American Lung Association's annual *State of the Air* report finds that 90 percent of Californians live in a county affected by unhealthy air, with many of California's most vulnerable communities facing the greatest impacts.<sup>1</sup> Children, seniors, people living with cardiovascular and respiratory issues and low income communities far too often bear the brunt of harmful fuel use, and have the most to gain from strong policies like the LCFS.

As the California Air Resources Board considers the next generation of this program, we offer the following recommendations to improve public health through the transition away from harmful fuels:

***2020 Target – Achieve 10 Percent Reduction in Carbon Intensity***

We encourage the Board to continue to pursue attainment of a full 10 percent reduction in carbon intensity of transportation fuels by 2020. The program is working as intended to increase the use of cleaner fuels, create incentives for zero emission fuels and maintain progress in achieving a 50 percent reduction in harmful fossil fuels by 2030. All efforts should be made to achieve the 10 percent reduction as quickly as possible and in line with the existing program goal.

***2030 Target – Establish a 2030 Carbon Intensity Target of 22 Percent or More***

Our organizations appreciate that the proposal takes a stronger approach to the 2030 target than the 18 percent reduction envisioned in the 2030 Scoping Plan. CARB's AB 32 Environmental Justice Advisory Committee recommended that the target be set at 30 percent.<sup>2</sup> Further, recent research suggests that even a 22 percent target for 2030 could be viewed as conservative.<sup>3</sup> We believed that the Scoping Plan was far too conservative and that the current proposal should be adjusted to achieve at least a 22 percent reduction in carbon intensity by 2030.

***Provide Stronger Signals and Increase Accessibility for Zero Emission Fuels***

The LCFS is a key component of California's transition to zero emission technologies and fuels, and the regulation should be strengthened to provide an even stronger push in this direction. Strengthening the overall target as recommended will help in this regard, but there are other parts of the regulation that can be strengthened to provide greater support to zero emission technologies and greater assistance in promoting ZEV markets. The proposal recognizes that the estimated carbon benefits of zero emission vehicle use need to be updated to ensure more accurate representation of the carbon benefits of zero emission technologies. We support the proposal to annually update estimates of the California electrical grid to better reflect renewable power benefits, and to update the efficiency credits earned by zero emission trucks and buses to reflect the most recent research. We also support the proposal to credit transportation refrigeration units under

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<sup>1</sup> American Lung Association. State of the Air 2017. [www.stateoftheair.org](http://www.stateoftheair.org)

<sup>2</sup> California Air Resources Board. AB 32 Environmental Justice Advisory Committee. "Recommendations for Proposed 2030 Target Scoping Plan Update." March 2017. [https://www.arb.ca.gov/cc/scopingplan/2030sp\\_appa\\_ejac\\_final.pdf](https://www.arb.ca.gov/cc/scopingplan/2030sp_appa_ejac_final.pdf)

<sup>3</sup> Cerulogy. March 2018. "California's Clean Fuel Future: Assessing Achievable Fuel Carbon Intensity Reductions Through 2030." <https://www.ucsusa.org/press/2018/scientists-say-california-can-get-tougher-clean-fuels#.W5acBy7waUk>

the LCFS as an important signal that the freight sector must continue to innovate and transition to zero emission technologies as quickly as possible.

Further, we continue to support programs that provide direct consumer rebates for zero emission vehicle credits generated under the LCFS. While these programs allow consumers to submit a request for rebate after purchasing a vehicle based on estimated zero emission fuel use, we encourage CARB to also consider the establishment of a pathway that would allow consumers to receive a rebate at the time of the vehicle purchase. This could be accomplished on a voluntary basis with zero emission vehicle makers opting to provide a rebate and submitting real-world charging data related to vehicle use. By aligning the rebate with real-world charging information, as well as vehicle type, the consumer could receive a clearer signal as to the benefits of their vehicle choices.

In closing, we support the vision offered in the proposal to exceed the target considered in the 2030 Scoping Plan, but encourage the board to pursue a stronger target for 2030. We support the efforts to update the evaluations of zero emission fuels and believe that these actions will ensure strong progress and health protections under the next generation of the LCFS.

Thank you,

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