



February 17, 2015

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

Re: Public Health Support for Low Carbon Fuel Standard

Dear Chairman Nichols:

On behalf of the undersigned organizations and individuals dedicated to improving the health and medical well-being of Californians, we write in support of the re-adoption of the Low Carbon Fuel Standard (LCFS) to advance California's leadership in moving beyond petroleum and promoting a healthier mix of transportation fuels to keep Californians moving. Since its original adoption, public health and medical groups have supported the LCFS as a key strategy for cleaning our air and ensuring California meets its landmark AB 32 climate targets for 2020. This policy will also be critical to help meet Governor Brown's health-protective goal to cut petroleum usage in California by 50 percent by 2035.

California's current dependence on petroleum fuels generates nearly half of our climate pollution, 80 percent of smog-forming NOx emissions and 95 percent of cancer causing diesel particulates¹. Approximately 40 percent of Californians live close enough to major roadways² to experience higher health risks caused by traffic pollution. These pollutants cause billions in health and economic costs and contribute to public health burdens including: respiratory and cardiac illnesses, hospitalizations and deaths as well as the growing health impacts of climate change. California must stay the course with the LCFS regulation to ensure fuels are at least 10% cleaner by 2020, and plan for continued reductions beyond 2020. We appreciate the inclusion of strengthening amendments, such as the provision designed to spur more investment in cleaning up local refinery facilities and produce health and community benefits. We also support the inclusion of safeguards as proposed by staff to ensure that any biofuels used to meet the standard maintain progress toward both criteria air pollution and greenhouse gas reduction goals.

Our comments support continuing forward progress with the LCFS to protect the health and well-being of all Californians, and especially those most impacted by dirty fuels, as more alternatives come online to combat climate change.

The Low Carbon Fuel Standard promotes a cleaner, healthier fuel mix. The LCFS moves California forward toward the cleanest, most sustainable, low carbon fuels. Each year the LCFS will promote a cleaner mix of fuels and support the implementation of important regulations like the Zero Emission Vehicle Regulation. The CARB analysis demonstrates that the LCFS will provide substantial health benefits by reducing pollution that cuts lives short. In 2020, CARB estimates that nearly 100 lives will be saved by displacing harmful fuels with cleaner, healthier choices.³ These findings complement recent Lung Association research demonstrating over 400 lives will be saved with the LCFS and Cap and Trade programs' implementation, avoiding over \$23 billion in societal damages, including \$8.3 billion in respiratory health impacts, by 2025.⁴ CARB should move forward to finalize these health-protective policies.

CARB should both maintain the 2020 LCFS target and plan additional emission reductions beyond 2020. California's health and medical community strongly support the proposal to re-adopt the LCFS with the original target for a 10 percent carbon reduction by 2020. This goal is vital to cutting the health harms caused by our transportation fuels by incentivizing ever-cleaner choices for Californians. In the first years of the program, the equivalent of taking nearly 2 million vehicles off the road was achieved through the modest requirements to reduce carbon – a number projected to equal removing over 7 million vehicles as the program moves on between 2016 and 2020^{5,6}. We believe that after the LCFS is re-adopted, that CARB must turn quickly to the next phase of the program and determine an ambitious course beyond 2020 and evaluate efforts to strengthen the regional programs developing along the West Coast.

Refinery Investment provisions support environmental justice and local air quality. We applaud the development of the refinery investment provision as a positive incentive to cut greenhouse

¹ California Air Resources Board, LCFS ISOR. P.ES-1

² Fabio Caiazza et al., Air pollution and early deaths in the United States, *Atmospheric Environment*, 2013

³ California Air Resources Board. Low Carbon Fuel Standard ISOR. "...91 deaths would be avoided for the year 2020 from implementation of the LCFS and ADF regulations." p. IV-9. The Draft Environmental Impact Analysis also found that

⁴ American Lung Association in California, Environmental Defense Fund: [Driving California Forward](#). May 2014.

⁵ CARB ISOR, p. II-1

⁶ United States Environmental Protection Agency, Greenhouse Gas Equivalencies Calculator. <http://www.epa.gov/cleanenergy/energy-resources/calculator.html>

gases, toxics and other air pollutants in communities burdened by refinery emissions. While this program is aimed at reducing petroleum consumption, we must also support incentives to clean up local pollution sources and improve community health as the LCFS moves forward. We are especially supportive of CARB precluding refinery investment projects that would cut carbon but increase criteria air pollutants or air toxics from receiving credits.

Biorefinery Siting Guidance needs update to incorporate new information on disadvantaged communities. Given the focus in many AB 32 discussions on the need to protect and improve health and air quality in California's most disadvantaged communities, CARB should provide more clear direction to staff on the timing to update the *Siting Guidance for Biorefineries in California* section on cumulative impacts. Specifically, the guidance document should be updated to reflect the development and widespread use of CalEPA's CalEnviroScreen tool for identifying communities most disadvantaged by local pollution.

Expanded electric transportation credits support clean air. Our organizations support the expanded role for electrification of transportation in the LCFS. The proposal to allow transit agencies to opt-in to the LCFS for fixed guideway systems (light rail, street cars, trolleys, etc.) encourages cleaner transit that cuts carbon pollution, cleans up neighborhood traffic pollution and supports sustainable communities as envisioned under Senate Bill 375. We support the provisions to more clearly account for the sustainability benefits of California's growing electric bus fleet. These expanded electric transportation credits provide local air quality benefits, encourage the development of more ultra-low carbon transportation options⁷ and support healthier, sustainable communities.

Ensure low carbon fuels support clean air progress. California needs to continue to focus on promoting the cleanest, most sustainable fuels over the long term. The LCFS regulation must ensure that any alternative fuels used to meet LCFS requirements in the short term contribute to both criteria pollutant and climate benefits without any unintended consequences. We believe that staff's proposal to re-adopt the Low Carbon Fuel Standard along with separate proposals being considered to protect against criteria emissions backsliding is an appropriate pathway forward.

In closing, our organizations strongly support the re-adoption of the LCFS to cut petroleum use, air pollution and climate change impacts as California moves forward to a low carbon economy. Further, the LCFS is a crucial component of climate leadership on the West Coast because it provides a strong model for national and international action to clean up transportation fuels and promote improved health and sustainability. We urge the California Air Resources Board to continue its leadership and advance the Low Carbon Fuel Standard to benefit all Californians.

Sincerely,

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⁷ California Air Resources Board LCFS/ADF Draft Environmental Impact Report. The sale of credits generated for could allow transit agencies to reduce fares, expand service or EV bus fleet or upgrade infrastructure. p.23

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