



CA·NURSES
FOR ENVIRONMENTAL HEALTH & JUSTICE



February 20, 2024

Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Health Group Support for Strong LCFS Standards

Dear Chair Randolph:

On behalf of the undersigned health organizations, we are writing to provide comments in support of a more health-protective and effective Low Carbon Fuel Standard (LCFS) for California. As the California Air Resources Board (CARB) considers amendments, we urge you to better align the program with the critical transition to zero-emission transportation needed to meet health-protective clean air and climate standards.

Despite decades of progress, California remains home to significant air pollution burdens. The American Lung Association's "[State of the Air](#)" 2023 report noted that 98 percent of Californians live in a community impacted by unhealthy levels of ozone and/or particle pollution and that six of the ten most ozone-polluted cities in the nation are in California. The health harms of breathing unhealthy air are well known to CARB and represent the lived experience of too many in our state, especially due to transportation pollution. The Health Effects Institute's [latest review](#) of hundreds of peer-reviewed research papers found that exposures to traffic pollution are associated with all-cause mortality, deaths due to heart disease and lung cancer deaths as well as new cases of asthma among children and adults. The transition to zero-emission transportation is core to CARB's work and must be aligned throughout the LCFS policy.

We appreciate that CARB has postponed the hearing on the LCFS and will hold an informational workshop in the coming months. We believe that these are important steps toward building a stronger program that advances the transition away from combustion everywhere possible and toward the rapid and equitable distribution of the benefits of zero-emission technologies. Several opportunities for strengthening the LCFS program to protect public health have been noted in CARB's workshops, earlier proposals and the current staff report. As the board considers the updated staff proposal, we offer the following comments:

- We support the original staff proposal to place a cap on credits for crop-based fuels rather than the sustainability reporting requirements included in the current proposal.
- We support the staff proposal shifting the Clean Fuel Rewards program's focus to rebates for medium- and heavy-duty vehicles and the proposal to increase the equity-based focus of light-duty charging credits.
- We support the intention to eliminate avoided methane emission credits but urge the board to act much sooner than the proposed phaseout at 2040 to limit ongoing incentives for new projects that facilitate more methane production as a means to capture LCFS credits.

- We support the proposal to curb credits for out-of-state projects that do not actually send fuel to - or support displacement of fossil gas use in - California.
- We support the proposed expansion of eligibility for alternative jet fuels to include intra-state travel. We also encourage the board to further expand credit eligibility to aviation and shipping sector projects utilizing zero-emission technologies.
- We encourage the board to consider an earlier phaseout of credits for petroleum development projects than the proposed phaseout at 2040.

Overall, we urge the board to consider a stronger LCFS program that increases the role of zero-emission technologies and reduces crediting for projects based on accounting strategies that extend fossil fuel consumption and combustion technologies. We look forward to continuing to work with CARB staff and the Board on this issue. If you have any questions, please contact Will Barrett at William.Barrett@Lung.org.

Sincerely,

Will Barrett
Senior Director | Nationwide Advocacy, Clean Air
American Lung Association

Barb Sattler RN, MPH, DrPH
Leadership Council Member
California Nurses for Environmental Health and Justice

Joel Ervice
Associate Director
Regional Asthma Management and Prevention (RAMP)