



On November 8, the California Air Resources Board, or CARB, is slated to consider approving amendments to California's Low Carbon Fuel Standard. [The program](#) has been so successful in replacing high carbon petroleum-based fuels with lower emissions vehicle fuels that interest groups from all sides of the political spectrum have come forward to demand radical changes that they argue will fix problems. Meanwhile, CARB staff is proposing several amendments that will update the program without undermining its fundamental features. The Board should adopt these proposals.

California has always been an environmental leader. For more than 50 years, we have pioneered new policies and ushered in new technologies to clean our air and protect our climate. The results are always a cleaner environment and a stronger economy, driven by innovation chasing new opportunity.

But it's never easy. We progress despite regular cries of impending doom from regulated industries and their enablers. Yet California continually succeeds, through the courage of our convictions and navigating through the noise. It's what CARB must do again now.

The Low Carbon Fuel Standard is one of California's most innovative policy successes. The

program requires oil companies to continually reduce the greenhouse gas emissions of California's transportation fuels. But targets under the program and other provisions need to be updated to maintain this success and ensure California meets its climate goals.

Over its short lifetime, the program has already transformed many segments of the fuels market. More than two-thirds of our diesel comes from renewable, non-petroleum resources, and many California refineries are shifting from refining fossil fuels to refining waste oils and other renewable feedstocks.

If CARB approves amendments to the program, the shift to clean fuels in California will only accelerate. The proposal would also expand an already rigorous accounting and tracking system to ensure that the cleanest, most sustainable low carbon fuels are used while we transition to full, zero emissions transportation.

According to CARB's analysis, the amended program would spur development and use of sustainable aviation fuels, more than cover the cost of infrastructure needed to support California's groundbreaking zero emission truck goals for the next decade, and inject over \$100 billion into the electric vehicle market alone. Overall, average fuel costs for California drivers are expected to fall by over 40 percent over the life of the program.

None of this would be possible without the market created by a healthy Low Carbon Fuel Standard, and no level of public investment or direct regulation could deliver a similar range of benefits across a wide array of emission sources and sectors. Other states and jurisdictions have taken notice and are implementing similar programs.

It's no surprise that oil companies and their allies are targeting the program more aggressively than ever. They claim the program raises gas prices, despite evidence from CARB and independent research showing that gasoline prices are minimally, if at all, impacted by LCFS credit prices. In fact, many oil companies likely profit from their investments in clean fuels and trading credits under the program.

This is a playbook we've seen before. In 2010, out-of-state oil companies pushed Proposition 23 on California voters, which would have suspended the state's pioneering climate policies, including the Low Carbon Fuel Standard. Voters saw through it and resoundingly rejected the proposal.

We can't let ourselves be fooled this time, either. There is too much on the line.

I understand many want to see further changes, and perhaps even dramatic overhauls, to

the program. Some critics complain that the state has failed to publish precise estimates of the future impact of the program on gasoline prices; we have heard this criticism every time California has acted to reduce pollution from fuels, going back to the days when we banned leaded gasoline. Each time, we have seen that fuels markets are way too dynamic and complicated to pin down to a simple number.

Many of the critics' proposals undermine the economic and scientific basis for the program, or even the rationale for clean fuels policy at all. But the fact is, we cannot afford to ignore this sector or let oil companies off the hook for reducing their emissions.

Our reliance on petroleum-based transportation fuels represents California's largest source of greenhouse gas emissions and air pollution, by far, and will continue to be until the 2040s, even as we transition to zero emission cars and trucks.

If we abandon this path now, we don't just risk failing on California's climate goals, we threaten climate policy around the world, too. California has created the most successful clean fuels market in the world, and the private sector has invested billions of dollars in response. If investors and clean fuel providers can't rely on the durability of California's environmental policies, whose policies would they ever trust?

Let's finish what we started. The future of California's climate leadership—and the durability of climate policy in this world at all—is on the line. CARB should adopt amendments to the Low Carbon Fuel Standard and continue leading the way toward a cleaner, healthier future.