



California Natural
Gas Vehicle Coalition

August 28, 2018

The Honorable Mary Nichols
Chair, California Air Resources Board
1001 I St.
Sacramento, CA 95814

Re: Proposed Modifications to the Low Carbon Fuel Standard Regulations (LCFS)

Dear Chair Nichols:

The California Natural Gas Vehicle Coalition (CNGVC) would like to thank the California Air Resources Board (CARB) for the opportunity to offer our comments on the proposed amendments to the Low Carbon Fuel Standard (LCFS).

The LCFS is critical to the state reaching its climate goals because it takes on the biggest source of pollution in the state, which is the transportation sector. It takes a step in the right direction towards meeting its initial goal of reducing petroleum dependency, diversifying fuel sources, and providing cleaner air.

The proposed amendment to allow capacity crediting for hydrogen and electric fuel infrastructure by CARB staff is problematic because it threatens the integrity of the LCFS as being fuel neutral. Instead, CARB should work to make sure that they are equally supporting all clean fuels that are helping the state decarbonize its transportation sector. If the LCFS is going to include capacity crediting, then it should be expanded to apply to all low carbon fuels. CARB should include all forms of clean fuel to ensure the state maximizes all the benefits and availability of cleaner technology. By allowing capacity crediting for all low carbon fueling infrastructure, CARB increases options and accessibility for businesses and fleet operators to utilize all cleaner fuels. This will send a clear policy message that the Board supports all forms of clean fuel and signals that CARB is committed to creating a diverse and competitive energy market.

If California is to meet its short-term and long-term emissions reduction goals it should prioritize clean transportation fuel that is already available and contributing to emission reductions now. The importance of biofuels should not be overlooked. Renewable natural gas and other biofuels are effective pathways for the transportation sector to transition to cleaner fuel and technology.

The LCFS program has been under attack and scrutiny since its inception. Supporters of the program, like CNGVC, have been able to defend and obtain legislative support for the program

because of the diverse stakeholders that are produced from its fuel neutrality. Taking that away is a step in the wrong direction and could have a dire effect on its longevity and success.

We strongly request that any change to this program not harm its fuel neutrality. We strongly believe that all “boats should float to the top” in order to get where we want to go. No one solution or fuel can solve all our problems, through working together we can continue to lead the nation in this critical time and on this critical issue.

Who We Are

CNGVC is an association of natural gas engine manufacturers, OEMs, utilities, fuel providers, and fleet operators serving the state. We are united in the belief that wider adoption of clean-running natural gas vehicles—running on renewable gas—is key to helping California reduce greenhouse gas emissions, air pollution and petroleum dependence.

Thank you for your time and consideration, please contact me if you have any questions at thomas@cngvc.org or at 888-538-7036.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas Lawson', with a horizontal line extending to the right.

Thomas Lawson
President, California Natural Gas Vehicle Coalition

Cc: Members, California Air Resources Board
Samuel Wade, Chief, Transportation Fuels Branch, Industrial Strategies Division