



California Natural
Gas Vehicle Coalition

****Sent via email****

September 5, 2017

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on proposed Amendments to the 2018 Low Carbon Fuel Standard Program

Dear ARB Staff,

On behalf of the California Natural Gas Vehicle Coalition (CNGVC), we would like to submit comments in response to Staff's LCFS Pre-Rulemaking Concept white paper as well as the August 7, 2017 Rulemaking Workshop, specifically on the proposed removal of the opt-in status of fossil CNG in the Low Carbon Fuel Standard program.

Who We Are

The CNGVC represents the state's natural gas vehicle industry and includes major automobile manufacturers, utilities, heavy-duty engine manufacturers, fueling station providers, equipment manufacturers, and fleet users of natural gas vehicles. We are working together to advance natural gas as an alternative transportation fuel.

The removal of opt in status from fossil CNG is inevitable. However, we believe there must be a phase in period for mandatory compliance especially during the years in which fossil CNG is still a credit generating fuel. Phasing out the opt-in status by 2019 will create financial and compliance burdens for fleets of all sizes.

The businesses that are investing in providing California with clean, alternative fuels depend on regulatory certainty and transparency. Sudden regulatory or compliance costs may be difficult for these entities to bear especially if they are looking to invest in new low NOx engines for their fleets. We would like to work with ARB in breaking down hurdles to getting more low NOX trucks on the road, not erecting them.

The LCFS program was designed to be fuel-neutral and to promote the use of alternatives to diesel and gasoline. Those fuels only make up 20% of the fuel used in California's transportation sector, so

we must continue to support all low carbon fuels in order to meet our ambitious goals and provide the air quality that we all deserve.

Please don't hesitate to reach out to me, if you have any questions or concerns at thomas@cngvc.org or at 888-538-7036.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Lawson', with a horizontal line extending to the right.

Thomas Lawson
President, California Natural Gas Vehicle Coalition