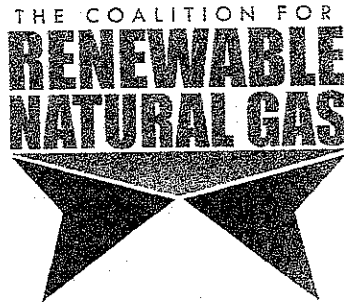


David Cox
13-8-2



September 26, 2013

California Air Resources Board
1001 I Street, 2nd Floor
Sacramento, California 95814

Honorable Members of the California Air Resources Board:

The Coalition for Renewable Natural Gas is a nonprofit organization dedicated to the advancement of renewable natural gas (biogas, biomethane or RNG) as a clean, ultra-low-carbon, resource for utilization in the generation of renewable electric power, thermal heat and transportation fuel.

The Coalition for Renewable Natural Gas respectfully requests that you adopt the Proposed Amendments to Alternative Fuel Conversion Certification Procedures, as reflected in the staff report.

We believe natural gas vehicles play a critical role in helping California reach many of its clean air and greenhouse gas emissions reduction goals. Accordingly, we commend staff and are particularly appreciative of their effort in drafting the Proposed Amendments. We also believe an adoption of the Proposed Amendments by the Board will further facilitate and expedite a timely transition away from gasoline and diesel to alternative fuels like fossil natural gas, and renewable natural gas.

Fossil natural gas and renewable natural gas are among the few transportation fuels that have the commercial potential to significantly reduce our dependence on foreign oil today by incrementally replacing the gasoline and diesel use by light-duty, medium-duty and heavy-duty truck and bus fleets, and passenger vehicles.

According to a recent report prepared by Energy Vision (a Coalition member) and the U.S. Department of Energy's Clean Cities Program, heavy-duty and medium-duty diesel fleets constitute less than five percent of all road vehicles. However, they consume about 23 percent of all on-road fuel, which equates to approximately 13 percent of total U.S. oil consumption.

www.RNGCoalition.com
1017 L Street, #513 Sacramento, CA 95814

As you consider adoption of the Proposed Amendments prepared by staff, we respectfully request that the Board simultaneously consider the need for *additional* action relative to heavy-duty diesel vehicle conversions.

The current proposal appears to maintain the *multiplier* deterioration factor (MDF) for heavy-duty diesel conversions. The Coalition requests that the Board take steps to update heavy-duty diesel conversion certification procedures to allow for the utilization of additive deterioration factors (ADF), similar to what the Proposed Amendments will do for gasoline and light-duty vehicle conversions.

In the interim, we request that you permit CARB staff to consider heavy-duty diesel conversions using *additive* DFs on a case by case basis.

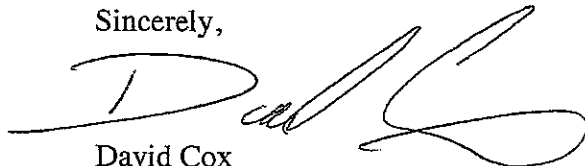
RNG provides communities with a clean-burning fuel that virtually eliminates the pollutants associated with diesel exhaust, including particulates. It can reduce a vehicle's carbon footprint by 88 percent or more, when compared to diesel.

Again, we support the Proposed Amendments as written. CARB staff and the stakeholders in this process have done a tremendous job. The report before you shows a great attention to detail and, if adopted, will go a long way to helping California transition to cleaner alternative fuel vehicles.

The potential positive impact of your action to adopt the Proposed Amendments today would only be further enhanced by a commitment to also consider and expedite the facilitation of heavy-duty diesel conversions.

On behalf of the Coalition for Renewable Natural Gas, we thank you for the opportunity to comment and appreciate your thoughtful consideration in advance.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Cox', with a large, stylized flourish extending from the end.

David Cox
Director of Operations, General Counsel
Coalition for Renewable Natural Gas