



California Natural  
Gas Vehicle Coalition

April 23, 2018  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: 2018 Low Carbon Fuel Standard Program Amendments**

Dear ARB Staff,

On behalf of the California Natural Gas Vehicle Coalition (CNGVC), we would like to submit comments in response to the proposed changes to 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.

We would like to align our comments with the Renewable Natural Gas Coalition, Bioenergy Association of California and the Western Propane Gas Association. We would to address a few items specifically.

**Near-Term and Long-Term Targets**

CNGVC does not support the reduction of the 2020 target to 7.25 percent. We believe that with stronger policy and incentive support for ultra-Low NOx trucks, fueled with Renewable Natural Gas, California can meet that target. We already know that heavy-duty trucks exponentially cause the most pollution and if the state turns its focus to cleaning up that sector now, we can provide cleaner air for the Californians that need it most. We ask that ARB consider keeping the existing 10 percent reduction target for 2020 in place with amendments to add a linear reduction benchmark schedule thereafter

We also strongly encourage the 2030 target to be increased to 22 percent. California have historically lead the nation in ambitious environmental policy, and now is not the time to ease up.

**Fuel-Neutrality Threatened**

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.

We look forward to working with staff on these issues. Please don't hesitate to reach out to me, if you have any questions or concerns at [thomas@cngvc.org](mailto: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