

January 4, 2022

Ms. Cheryl Laskowski, Branch Chief  
Transportation Fuels Branch  
California Air Resource Board  
1001 I Street,  
Sacramento, CA 95814  
[Cheryl.Laskowski@arb.ca.gov](mailto:Cheryl.Laskowski@arb.ca.gov)

**SUBMITTED VIA ONLINE PORTAL**

**Re: Low Carbon Fuel Standard December 7<sup>th</sup> Workshop**

Dear Ms. Laskowski:

Thank you for the opportunity to comment on the recent workshop discussing potential revisions to the Low Carbon Fuel Standard (LCFS) program. The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of the plan and the policies and procedures that may emerge as a result of these discussions.

WPGA would like to emphasize that we support decarbonization efforts, but also firmly believe that any strategy and encourage CARB to continue its practice of a fuel agnostic, full fuel-cycle analysis program.

While each fuel source has its own advantages, many fleets across California and the nation choose propane to power their on- and off-road vehicles. Propane provides fleet owners with a low emission, low cost, and high-energy fuel without compromising performance, range or engine life. We advocate supporting all low carbon solutions, based on the full fuel cycle carbon footprint to address environmental challenges, per the original intent of the Low Carbon Fuel Standard. Propane provides reliability, affordability, stability and resiliency, all of which are key when looking to transition California's transportation sector to cleaner fuels.

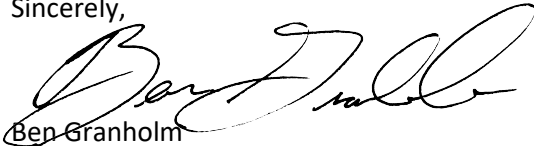
The propane industry has and is investing heavily in renewable propane, derived from sustainable sources like beef tallow or vegetable oil. Renewable propane provides low carbon intensity scores, and can even be blended with renewable DME which provides for methane capture to help attain the State's emission reductions goals. Any changes introduced by this agency that disincentives or disrupts the current projected marketplace for the renewable fuel could be detrimental and leave many fleet owners without an immediate renewable energy solution. The continued inclusion of renewable fuels and biofuels in the LCFS will play an important role by sending market signals of the importance of in-state production of renewable propane and the continued production of low-NOx engines to help reduce emissions in the near-term and for decades to come.

Renewable propane provides a great opportunity to reduce emissions today, without compromising power and is also completely fungible with current propane-fueled engines, vehicles, and fuel storage equipment, with no additional cost for fleets to transition to renewable propane. In addition, there is already enough renewable propane available in the United States today to displace 15% of the fossil

propane consumed in the California's transportation sector. WPGA is dedicated to helping California meet its decarbonization goals and has made a sustainability commitment to supply 100% renewable propane in California by 2030. The use of renewable propane, for example, in near-zero propane trucks significantly reduces carbon and NOx emissions that must remain an important focus in order to meet federal attainment.

Through fuel and technology innovation, propane is providing a path towards achieving emission reduction goals in both the on- and off-road sector. We appreciate your work on the LCFS program and hope the Board and staff will recognize the role that propane and renewable propane have to play as the state strives for clean energy security and decarbonization in the transportation sector.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Granholm", written over a horizontal line.

Ben Granholm

Regulatory Affairs Specialist