



July 2, 2018

Jack Kitowski, Chief, Mobil Source control Division  
Tony Brasil, Branch Chief, Heavy Duty Diesel Implementation Branch  
California Air Resource Board  
1001 I Street  
Sacramento, CA 95814

RE: Innovative Clean Transit Regulation

Dear Mr. Kitowski and Mr. Brasil:

I wish to thank CARB for the time invested on the development of the ICT rule and for the opportunity to provide our feedback. Please accept these comments on behalf of the Western Propane Gas Association (WPGA) and its members who provide propane fuel, products, and services supporting low-emission vehicle and transportation initiatives across California. Fleet owners select propane for its low infrastructure cost coupled with a low maintenance and fuel cost. Propane provides a lower emission vehicle option for California school buses, airport shuttles, and public transit buses, particularly in rural areas without access to alternative-fuel low-emission options or with vehicle duty cycles and environmental conditions exceeding the practical and technical limits of current and anticipated next-generation fully-electric heavy-duty ( $\geq 14,000$  lb. GVWR) vehicles (HDV).

As you are likely aware 85% of California's land mass is rural with communities often having little or no access to low-emission alternative fuels. While electric heavy-duty vehicles may make cost-effective sense for some applications, they are simply not yet capable of reliably handling bus duty cycles involving longer rural route distances, steeper road grades, and temperature extremes (cold winters and/or hot summers) typical of rural, mountainous, and desert locales. Providing a reliable lower-emitting heavy-duty vehicle option in the ICT regulation will act not solely to reduce bus-related emissions that will otherwise occur but will embrace CARB's commitment to ensuring incentive program operational parity and fairness across all of the State's many, varied regions and populations.

As it relates to the information presented at the June 13, 2018, WPGA wishes to make the following recommendations:

- Ensure the regulation is inclusive of propane low NOx engines for any low NOx engine requirements.
- Factor in the carbon intensity value for all fuels, including renewable propane when identifying low-carbon, fuel neutral strategies for reducing GHG emissions.

In conclusion, I thank you again for the opportunity to provide feedback prior to adopting new regulation. Please do not hesitate to contact me if I can provide further information.

Warm regards,

/s/ Joy Alafia

Joy Alafia  
President and CEO, WPGA