



April 12, 2022

The Honorable Laine Randolph
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Support for CARB's Continued Inclusion of All Low Carbon Fuel Sources in the Low Carbon Fuel Standard

Dear Chair Randolph:

The California Natural Gas Vehicle Coalition (CNGVC) writes to express our strong support for the California Air Resources Board (CARB)'s decision to reject counterproductive changes to the Low Carbon Fuel Standards (LCFS) that would have excluded biomethane from the program. We concur that such action would make it exceptionally difficult for California to reach transportation decarbonization.

The U.N.'s Intergovernmental Panel on Climate Change warns that we must limit the planet's warming to 1.5 degrees Celsius to avoid irreversible, catastrophic climate change. Reducing methane emissions—the world's second-most-abundant greenhouse gas (GHG) and a potent Short-Lived-Climate-Pollutant (SLCP), is key to achieving this outcome. Methane is 80 times more powerful than carbon dioxide in trapping heat in our atmosphere, even though methane only remains in the environment for a fraction of the time. Therefore, we must prioritize methane reductions in order to immediately slow global warming and exceed the internationally recognized warming limit.

As the world searches for an effective means to capture and reuse methane, California's LCFS program is successfully working as intended to achieve this goal. As such, it remains a primary driver for major reductions and continues to serve as a model for other state, federal, and international proposals to achieve greater results. Given the program's success and the persistent need to combat the disastrous changes to our climate, CNGVC strongly encourages CARB to not only reject imposing fuel preferences, but also work to increase support for the production of all low-carbon fuels that meet the program's criteria for negative carbon intensity.

As a technology-neutral program, the LCFS reflects a commitment to an "all-hands-on-deck" approach to reducing emissions, with California's farmers, automakers, fuel producers, goods movers, and environmental advocates all working together to combat climate change and clean our air. The program represents a critical component to CARB's transportation decarbonization strategy through the production of renewable natural gas (RNG) and we encourage you to maintain its current technology neutral, standards-based approach.

The LCFS is effectively incenting the reductions of GHGs and reducing the climate impact of the dairy and swine farming industry and producing low carbon fuels. The LCFS encourages the capture of fugitive methane emissions derived from agricultural waste. When seized, this waste is converted from a toxic pollutant into a valuable low-carbon fuel source: RNG. Even the byproducts of RNG processing—nutrient-rich solids and liquids—have value as a fertilizer. Producing RNG from organic waste sources provides an opportunity to double our emissions reduction impact by capturing the methane that would

have otherwise been emitted into the atmosphere and then using it as a tool to eliminate future emissions.

Renewable natural gas (RNG) derived from organic waste is critical in the fight against climate change. The transportation sector is California's largest source of carbon dioxide, including Short-Lived Climate Pollutants, contributing over a third of the state's GHG emissions. Slashing SLCP emissions immediately is necessary to prevent the irreparable warming of the planet past the point of catastrophe. Diesel fuel is a major source of black carbon, and the overwhelming majority of medium and heavy-duty trucks on California's highways are powered by diesel fuel. Displacing diesel trucks and eliminating their emissions is the fastest and most effective way meaningfully reduce SCLPs.

RNG-fueled low NOx trucks are the cleanest technology available today that can be deployed as a 1-for-1 replacement of diesel-powered trucks. Nothing can reduce black carbon more effectively than renewable fuels that displace diesel. Low NOx trucks, fueled by RNG, are certified by CARB as 90% cleaner than today's certified diesel and diesel particulate matter is reduced 100% by trucks that run on this renewable fuel. CNGVC believes our state's top priority for combating climate change should be the rapid reduction of SCLP in the near-term.

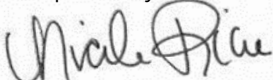
Carbon negative fuel sources, and near-zero emission vehicles, that use them are critical tools to reduce emissions and combat climate change. The growing consensus among scientists and advocates combating climate change is that we must go beyond reducing emissions to achieve our global reduction targets; we must transition into policies prioritizing net negative emissions to avert dangerous levels of climate change.

Based on CARB data, natural gas (RNG and fossil) was on average a -28.17 gCO₂e/MJ, which makes natural gas used as a transportation fuel the only negative carbon intensity fuel and the lowest carbon fuel under the LCFS. Additionally, low NOx trucks are the only transportation technology available and ready to be deployed today that delivers *less than zero* GHG emissions and RNG is the only transportation fuel that has achieved this distinction to date.

CNGVC is a diverse coalition of engine and vehicle manufacturers, fleet operators, utilities, and renewable fuel providers whose sole focus is the reduction of criteria, toxic and greenhouse gas pollutant emissions from the heavy-duty transportation sector. We are dedicated to the advancement of low NOx trucks powered by carbon-negative renewable natural gas (RNG) as a proven solution to immediately help the State realize its decarbonization goals.

For these reasons, CNGVC asks that CARB retain the LCFS as a technology-neutral program that prioritizes the developing and deploying of the cleanest available fuels to decarbonize California's transportation sector. We believe RNG and the sources that can be used to produce it are a vital tool in the state's fight to reduce emissions and improve air quality. Feel free to contact me at nicolerice@cngvc.org if you have any questions regarding our position.

Respectfully,



Nicole Rice, President

cc: CARB Board Members