



California  
Natural Gas  
Vehicle Coalition



Driving Trucking's Success



Clean Energy



Westport



November 1, 2013

Mary D. Nichols, Chairman  
Richard Corey, Executive Officer  
California Air Resources Board  
1001 I St.  
Sacramento, CA 95814

**RE: October 1, 2013 Climate Change Scoping Plan First Update: Discussion Draft for Public Review and Comment (Scoping Plan Discussion Draft)**

Dear Chairman Nichols and Mr. Corey,

The undersigned would like to voice our strong opposition to the inclusion of the statement on natural gas on page 88, paragraph 3 of the Scoping Plan Discussion Draft and would like to voice our strong concern for the Air Resources Board's (ARB) apparent move towards technology biased, rather than technology neutral, policies. We request the following edits to the statement on natural gas:

*"Natural gas has an important ~~niche~~ role to play in contributing to California's air quality and GHG emissions goals in the transportation sector. Heavy-duty natural gas vehicles may offer significantly lower NOx emissions than current diesel technology, and ~~slight~~ improvements in GHG emissions. Increasing penetration of natural gas in the heavy-duty truck sector could help to meet midterm air quality targets, ~~but natural gas use will have to be mostly phased out to meet 2050 climate targets and provides many options for the generation of clean power and fuels, now and in the future.~~"*

Traditionally, ARB has set technology neutral performance standards. Given 2050 is nearly forty years of innovation in the future, we believe that performance-based, outcomes-oriented policy should continue as it is much too early to rule out any particular emission control approach.

Heavy-duty natural gas vehicles provide many benefits for both the environment and the economy such as:

- Potential to reduce NOx by up to 90% compared to the 2010 Environmental Protection Agency (EPA) truck engine standards,
- A cost-effective fuel for trucking fleets due to the low cost of natural gas,
- Domestically produced fuel with an increasing renewables sector, and
- Potential to dramatically reduce greenhouse gas emissions.

In fact ARB has identified bio-methane from landfills available today as one of the lowest carbon intensity (CI) fuels with a CI of just 11.26.

Importantly, mandating a particular energy type or source undermines the very technology investments needed to meet short- and mid-term goals that are acknowledged in the Plan.

For the above reasons, we ask that ARB modify the above paragraph in the Scoping Plan Discussion Draft and continue use of technology neutral, performance standards-based policies and regulations.

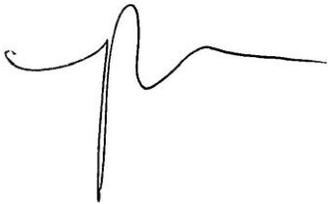
Sincerely,



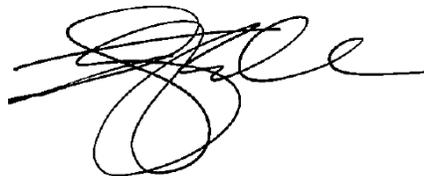
Eric Sauer, Vice President of Policy  
California Trucking Association



Tim Carmichael, President  
CA Natural Gas Vehicle Coalition



Tanya Peacock  
Environmental Policy Manager  
Southern California Gas Company



Todd R. Campbell, MEM, MPP  
Vice President, Public Policy and Regulatory Affairs  
Clean Energy



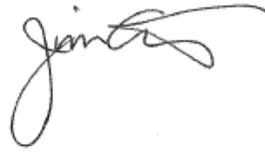
Michael Tunnell  
Director, Environmental Affairs  
American Trucking Associations



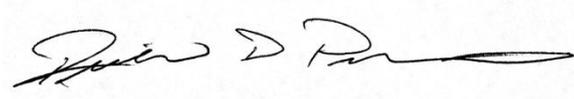
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