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California Air Resources Board
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Submitted Electronically: http://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=techfuel-report-ws&comm_period=1

RE: **Comments on the California Air Resources Board's Draft Technology Assessment: Low Emission Natural Gas and Other Alternative Fuel Heavy-Duty Engines**

The California Trucking Association (CTA) and the American Trucking Associations (ATA) are pleased to have the opportunity to review and comment on the California Air Resources Board's Draft Technology Assessment: Low Emission Natural Gas and Other Alternative Fuel Heavy-Duty Engines.[1] We appreciate staff's efforts in preparing the assessment and view the draft as a starting point for a discussion of this technology. The following comments reflect the experience and viewpoint of the trucking industry as they pertain to this technology and should be reflected in the assessment.

General Comment: CARB staff has rightly identified current and future barriers to the widespread adoption of natural gas vehicles in the trucking industry, including high incremental cost, limited performance, fueling infrastructure and the fluctuating price of diesel. Both CTA and ATA support continuing to advance these technologies and their adoption through an incentive-based approach which buys down the high incremental cost of natural gas vehicles and the associated costs of fleet conversion.

In 2013, CTA performed an informal survey of approximately 100 fleets who indicated they were interested in purchasing natural gas vehicles. 82% of the fleets surveyed indicated that they would either not purchase natural gas vehicles without public incentives or that these incentives would motivate the fleet to purchase more vehicles than they otherwise would. Therefore, we continue to believe that deployment of natural gas vehicles continues to be dependent on the availability of public incentives.

In recent years, CTA has supported the reauthorization of the CEC Alternative and Renewable Fuel & Vehicle Technology Program (AB118) and the dedication of no less than 20% of the Greenhouse Gas

[1] CTA serves the commercial motor carrier industry in California and the companies that provide products and services to the trucking industry. ATA is the national trade association representing the American trucking industry and is a united federation of motor carriers and suppliers, state trucking associations, and national trucking conferences.

Reduction Funds (GGRF) targeted towards heavy-duty trucks to existing low-emission and alternative fuel technologies until 2018 (SB1204). In the near-term, these funds have provided approximately $10-12 million on an annual basis towards the deployment of natural gas vehicles.

Beyond 2018, the State of California will need to continue to dedicate GGRF monies towards a wide range of lower-emission vehicles with both greenhouse gas and NOx co-benefits, including those utilizing internal combustion engines like lower-emission natural gas vehicles.

However, with regards to the call for widespread utilization of renewable fuels, we would encourage CARB to continue to focus the point-of-regulation on fuel suppliers rather than fleet end-users.

P. ES-2: CARB staff's assertion that NOx emissions from low-emission natural gas trucks are expected to be higher than those of fuel cell or battery electric trucks should be supported within the document with well-to-wheel emission estimates of various technology and fuel pathways. It would also be useful for policymakers to include the cost-effectiveness of emission reductions achieved and a plausible market penetration scenario to accurately depict the effectiveness of various deployment strategies

P. ES-3: Please provide citation for assumed 5-9% CO2e reduction relative to 2010 baseline.

P. ES-13: CARB staff calls for a focus on incentives for low-NOx engines capable of Class 7-8 long-haul use, powered with renewable natural gas. It is important to note that limitations on some California incentive programs will prevent this from occurring. "California-only" mileage and SB535 disadvantaged communities will limit the ability for long-haul fleets to utilize incentives. Also, California will have limited influence over deployment of renewable fuels in other states. It could be argued that the Low Carbon Fuel Standard will, in fact, limit the availability of renewable natural gas outside of California because of the financial incentive to deploy such fuels within the state.

P. V-3: With regards to Figure V-2, we would recommend including a lower end annual miles traveled for "Short Haul CNG" closer to 20-30k miles. Also, it would be helpful to include multiple truck incremental cost scenarios.

If you have any questions regarding these comments, please contact us at your convenience.

Respectfully,

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