



California Natural Gas Vehicle Coalition

February 14, 2012

Ms. Margaret Lin
Southern California Association of
Governments
818 W. 7th Street, 12th Floor
Los Angeles, California 90017-3435

Re: SCAG's 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy

Dear Ms. Lin:

I am writing on behalf of the California Natural Gas Vehicle Coalition to provide comments on the Southern California Association of Governments' (SCAG) 2012-2035 Draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

The California Natural Gas Vehicle Coalition (CNGVC) is an association of natural gas vehicle and engine manufacturers, utilities, fuel providers and fleet operators serving the state. We work with legislators and regulators to develop policies that will increase alternative fuel and vehicle use, support new initiatives and provide up-to-date information on NGV technology and market developments.

Our primary concern is that the draft plan largely ignores natural gas as a transportation fuel and its potential to be a significant part of the solution for the region's transportation, air quality, and sustainability goals. By focusing almost entirely on "zero-emission" vehicles we believe SCAG is missing the opportunity to develop a strategy that achieves the same benefits in a shorter time frame and for significantly less cost.

Over the last two decades we have seen in California that it is very difficult to predict which technology will succeed and even more difficult to say when they will achieve significant market penetration. That is why more agencies and companies are taking a portfolio approach to developing and deploying clean transportation technologies.

Natural gas should be an integral part of your Regional Transportation Plan. Natural gas is a very clean fuel, available today for half the price of diesel, and it is abundant in North America. This is why the medium- and heavy-duty vehicle markets in particular are embracing natural gas like never before. Many public and private fleets are investing in natural gas vehicles. Transit agencies, taxi fleets and private companies such as Waste Management; United Parcel Service, AT&T, and Verizon have purchased thousands of small, medium, and large natural gas vehicles.

The heavy duty vehicle sector seems to show the greatest promise for natural gas because of the fuel cost savings over diesel and the lack of other viable alternatives to diesel. Recently Swift Transportation, one of the largest trucking companies in the country, said they would be investing heavily in natural gas trucks and could reach 30%-40% penetration in their fleet in 3-4 years.

Be careful about "zero-emission". The term is used a bit too freely these days. Using life cycle emissions analysis California has found that zero-emissions at the tailpipe are only part of the picture. It is important to consider the whole picture including upstream emissions from production and transportation of fuels. Some are trying to draw a bright line between "ZEV fuels and technologies" and "non-ZEV fuels and technologies". We do not see a bright line now and to the extent that there is a line we see it fading over time. Natural gas vehicles are near-zero emissions today and are getting cleaner with each generation of engines. Biomethane (aka renewable natural gas) has been identified as one of the cleanest transportation fuels by the California Air Resources Board. Renewable Natural Gas has 90% less carbon emissions than gasoline. Sources include landfills, agricultural operations like dairies, and waste water treatment plants. Whether it is used on its own or blended with conventionally natural gas it is likely to be one of the cleanest fuels in transportation over the next couple of decades.

For these reasons we ask you to revise your plan to include natural gas as a meaningful part of the solution.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink that reads "Tim Carmichael". The signature is written in a cursive, flowing style.

Tim Carmichael
President