

November 18, 2011

Ms. Barbara Van Gee Manager Goods Movement Programs Section Air Resources Board (sent via email)

Re: Proposition 1B – Goods Movement Emission Reduction Program

Dear Barbara:

I am writing on behalf of the California Natural Gas Vehicle Coalition to provide feedback on the Preliminary Staff Proposal for 2011 Funding Awards. We strongly believe that by modifying the Air Resources Board staff proposal to include alternative fuel vehicles that California can realize significantly greater benefits with the same level of investment.

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.

The CNGVC is clear that ARB staff is trying to meet a tight timeline and that you are trying to get the most air quality benefits with the funds available. We recognize these challenges but feel staff is missing significant opportunities with the current proposal. By focusing only on diesel replacement trucks ARB is missing the opportunity to support greater use of alternative fuels, get significantly greater greenhouse gas reductions, and reduce our state's dependence on petroleum. The staff proposal is also a short-term strategy which will have limited if any benefits beyond this decade.

To achieve greater benefits for a longer period of time we encourage staff to modify your proposal to include a combination of long- and short-term strategies. Specifically we recommend that you dedicate at least a third of this round of funding (\$33 million) to alternative fuel vehicles and double the size of the grants (to \$60,000) for companies and individual truckers who choose to purchase a compliant alternative fuel vehicle.

Tim Camihael

We are happy to discuss these recommendations with you at any time.

Thank you for the opportunity to comment and for your consideration of our ideas.

Sincerely,

Tim Carmichael

President