



July 14, 2025

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure

Dear Members of the California Air Resources Board:

Introduction

The Transport Project and RNG Coalition submit the following joint comments regarding the proposed amendments to the Advanced Clean Trucks Regulation and Zero-Emission Powertrain Certification Test Procedures.

TTP is a national coalition of roughly 200 fleets, vehicle and engine manufacturers and dealers, servicers and suppliers, and fuel producers dedicated to the decarbonization of North America's transportation sector. Through the increased use of gaseous motor fuels including renewable natural gas (RNG) and hydrogen, the United States can greatly improve air quality safely, reliably, and effectively without delay and without compromising existing commercial business operations.

RNG COALITION represents the renewable natural gas (RNG) industry in North America. We are a non-profit association of companies and organizations that advocates and educates for the sustainable development, deployment and utilization of RNG so that present and future generations will have access to domestic clean fuel, heat, power, products and services. Our membership includes approximately 400 companies throughout the value chain of waste feedstock conversion to end uses. RNG is biogas-derived fuel whose production starts with the capture of emissions from organic waste, including agricultural wastes, municipal wastewater, and municipal solid waste in landfills. Biogas is subsequently upgraded to RNG with quality standards necessary to blend with or substitute for geologic natural gas.

Comments

TTP and RNG COALITION appreciate the Board's willingness to make changes to its regulations to advance the commercialization of clean trucks. We are committed to advancing the use of new ultra-low NOx natural gas trucks while also increasing the use of renewable natural gas as a transportation fuel.

The California market has witnessed tremendous growth in the use of renewable natural gas as a transportation fuel so much so that renewable natural gas accounts for nearly all the fuel consumed by natural gas vehicles. According to CARB's LCFS data, RNG currently is the only carbon negative fuel available in California.

Fuel providers, fleets and business operators in California have invested hundreds of millions of dollars to support the successful development and commercialization of natural gas as a transportation fuel. To ensure continued growth and development of this successful market and to continue the emission reductions provided by natural gas vehicles it is critical that changes to the ACT Regulation include greater opportunity for natural gas trucks.

The changes CARB has proposed are welcome, but much more must be done. TTP and RNG COALITION welcome the opportunity to discuss additional ways that CARB can work with stakeholders to immediately expand opportunities for renewable natural gas-powered trucks. Creating new opportunities for natural gas trucks will help businesses continue to monetize their low-carbon and low-emission investments, providing additional competition in the transportation marketplace and driving down costs for affected businesses. Expanding opportunities for commercially available natural gas trucks also will help to strengthen the ACT Regulation by accelerating efforts to retire older, more polluting trucks without delay.

Increasing access to new natural gas truck offerings will ensure that California is able to modernize the fleet of trucks operating in the state using the cleanest and most cost-effective technology available. The fact is that today the cleanest available trucks are those that are certified to the Omnibus 50 milligram standard for NOx and that also operate on renewable fuels such as renewable natural gas. According to Energy Vision's March 2025 report, *A Path to a Healthier America: Ditching Older Diesel Trucks*¹, RNG trucks deliver 88% of the benefits of electric vehicles. An even more recent report² published by University of California, Riverside academics goes even further in stating the benefits of new lower-NOx trucks and their ability to deliver significant NOx emission benefits.

In light of these benefits, TTP and RNG COALITION urge CARB to expand the ACT "near zero" definition to include ICE engines certified at or below 50mg NOx (without use of emission credits) through 2030 for Class 7–8 tractors. CARB also should extend this recognition through 2035 for Near Zero engines meeting a 20mg NOx standard.

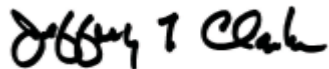
¹ <https://energy-vision.org/pdf/ditching-diesel.pdf>

² <https://www.sciencedirect.com/science/article/abs/pii/S0048969725014226?via%3Dihub>

Conclusion

Fuel providers, manufacturers and fleet operators stand ready to assist California in accelerating efforts to lower emissions and provide improved air quality. It is imperative that California move expeditiously to adopt policy changes as it is evident that the current pace of movement to advance clean trucks is faltering.

Thank you for considering these comments. TTP and RNG COALITION welcome the opportunity to meet with the Board members or staff to discuss these comments.



Jeff Clarke

Vice President, Reg. & Government Affairs,
and General Counsel
The Transport Project
JClarke@TransportProject.org



Sam Wade

Vice President of Public Policy
RNG COALITION
sam@rngcoalition.com