

**Comment 1 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Graham  
Last Name: Noyes  
Email Address: graham@noyeslawcorp.com  
Affiliation: Attorney for StepOne Tech America Inc.

Subject: cleanmilesstandard - Comment of StepOne Tech America Inc.  
Comment:

Dear Clerk of the Board,

Attached please find the comment of StepOne Tech America Inc. regarding the proposed Clean Miles Standard with exhibits attached.

Please contact me if there are any problems with the transmission or any questions relating to the comment.

Thank you for your assistance.

Best Regards,

Graham Noyes

Graham Noyes  
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Nevada City, CA 95959  
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graham@noyeslawcorp.com  
<https://www.linkedin.com/in/grahamnoyes>  
@Graham Noyes

Attachment: 'www.arb.ca.gov/lists/com-attach/1-cleanmilesstandard-VSYBc1M3UHMFbFQ6.pdf'

Original File Name: StepOne CMS Comment 27 Apr 2021 w Exhibits.pdf

Date and Time Comment Was Submitted: 2021-04-27 10:05:59

No Duplicates.

## **Comment 2 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Mark

Last Name: Roest

Email Address: MarkLRoest@gmail.com

Affiliation: Sustainable Energy Inc.

Subject: Proposed Clean Miles Std. as a Floor, not a Ceiling for Driving Change

Comment:

The electrification target commencement date of 2023 and target of 2% eVMT are unreasonably late and low, as is the increase to 90% eVMT in 2030, considering both the rapid evolution of the California market, and what is possible for the major TNCs. They have the stock valuation to be able to subsidize and finance or underwrite leases or purchases of high-all-electric-mileage PHEVs today, and 300+ mile range BEVs by 2024, and to fund and build or contract for charging infrastructure that includes stationary batteries and solar canopies to relieve loads on the grid and minimize capacity charges. Not only is it possible for the TNCs, it is highly beneficial for the largely minority and disadvantaged-community-member drivers.

Context: I support the next proposed section ("The Standard would require ...") as methods of gaining compliance by the TNCs, but both my calculations and those of Tony Seba show that we can and probably will get to near-zero ICE cars being sold after 2024 or 2025, through the introduction of disruptive technologies which are now working under financial handicaps due to private investment market conditions. The standards should be structured as temporary floors, which will be raised as products come to market which can disrupt the market, or portions of it.

In other words, best feasible technology should be the floor, and track breakthroughs closely, accompanied by non-dilutive funding and low-cost financing of small technology companies. As a floor, it should require commercial vehicle manufacturers to adopt these technologies as rapidly as is technically possible, and would reward those who lead the way with subsidies greater than those for companies demonstrating inertia.

In addition, in order to 1) greatly accelerate adoption of BEV drive trains compared to the normal rate of turnover, and 2) maximize improvements in quality of life and prosperity for disadvantaged and minority communities, funding should be made available for systematic development, production and distribution of conversion kits for all vehicles in wide use, of any age, and incentives and BEV charging infrastructure development support should be provided. By 2022 conversion kits should be available for medium to heavy duty trucks and buses, with at least twice the range per pound of today's lithium battery packs. Those creating these systems can also be encouraged and rewarded for developing kits for the vehicles most used, and / or creating the most GHGs, in the existing TNC fleets. As with new vehicles, stationary batteries and solar canopies, managed by advanced energy management systems, can minimize the life cycle cost of energy, and enable fleets and independent operators to rely on solar energy and least-cost grid electricity to continue to drive their repowered

and refurbished trucks until they are ready to retire. It will even enable repowered cars and trucks with drivers to compete economically with new autonomous fleet vehicles, greatly improving prosperity and overall well-being in disadvantaged, pollution-impacted, and minority communities. The proposed standard should be overtly and tightly linked to the other programs that work for the State goals alluded to in my statement.

"The Standard would require a transportation network company to meet a GHG target of 252 g CO<sub>2</sub>/PMT in 2023, decreasing to 0 g CO<sub>2</sub>/PMT in 2030. Transportation network companies would have various options to reduce company-wide GHG emissions to the annual targets, including improving fleet-wide fuel efficiency, reducing VMT by increasing shared rides, reducing VMT by reducing deadhead miles (i.e., those miles driven without a passenger), and earning CO<sub>2</sub> credits by investing in active transportation infrastructure or by providing integrated fare services to connect riders to mass transit."

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2021-05-03 17:25:39

No Duplicates.

**Comment 3 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Cory  
Last Name: Bullis  
Email Address: cbullis@flo.com  
Affiliation:

Subject: EVCA & Auto Innovators Comments on Clean Miles Standard  
Comment:

Please see attached comments on the proposed Clean Miles Standard regulation order.

Attachment: 'www.arb.ca.gov/lists/com-attach/3-cleanmilesstandard-BWAGdgZkVmQAWVQL.pdf'

Original File Name: EVCA & Auto Innovators CMS Comment Letter 5.5.21.pdf

Date and Time Comment Was Submitted: 2021-05-05 11:41:16

No Duplicates.

**Comment 4 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Cory  
Last Name: Bullis  
Email Address: cbullis@flo.com  
Affiliation:

Subject: FLO Comments on Clean Miles Standard  
Comment:

Please see attached comment letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/5-cleanmilesstandard-VjBXPVU7BAhRNIUn.pdf'

Original File Name: FLO ARB Clean Miles Standard Comments 5.17.21.pdf

Date and Time Comment Was Submitted: 2021-05-17 10:08:17

No Duplicates.

**Comment 5 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Paul  
Last Name: Augustine  
Email Address: paugustine@lyft.com  
Affiliation: Lyft

Subject: Lyft Comments on the Clean Miles Standard and Incentive Program Proposed Regulation Order  
Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/7-cleanmilesstandard-VzZTIFQyAiQGcwF1.pdf'

Original File Name: augustine.pdf

Date and Time Comment Was Submitted: 2021-05-17 10:29:59

No Duplicates.

**Comment 6 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Tom  
Last Name: Becker  
Email Address: tsbecker069@gmail.com  
Affiliation:

Subject: Public Comment on Clean Miles Standard  
Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/8-cleanmilesstandard-VDYHZABiV29SMVAi.pdf'

Original File Name: becker.pdf

Date and Time Comment Was Submitted: 2021-05-17 10:32:06

No Duplicates.

**Comment 7 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Alex  
Last Name: Larro  
Email Address: alarro@uber.com  
Affiliation: Uber

Subject: Comments of Uber Technologies, Inc. on Proposed Clean Miles Standard Regulation  
Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/9-cleanmilesstandard-BmpUMwd0UXBVPAgm.pdf'

Original File Name: larro.pdf

Date and Time Comment Was Submitted: 2021-05-17 10:35:19

No Duplicates.



**Comment 8 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Elizabeth

Last Name: Irvin

Email Address: EIrvin@ucsusa.org

Affiliation: Union of Concern Scientists

Subject: Public Comment on the Clean Miles Standard

Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/10-cleanmilesstandard-Vj8AdFYhUGoHbwQq.pdf'

Original File Name: irvin.pdf

Date and Time Comment Was Submitted: 2021-05-17 10:47:22

No Duplicates.

## **Comment 9 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Jeremy  
Last Name: Michalek  
Email Address: jmichalek@cmu.edu  
Affiliation: Carnegie Mellon University

Subject: Proposed Clean Miles Standard  
Comment:

Dear Liane Randolph and California Air Resources Board members,

Thank you for the opportunity to provide comments on the proposed Clean Miles Standard. We are researchers at Carnegie Mellon University who study transportation, energy, environment, air quality, public policy, and related issues for shared mobility, ridesourcing, transportation network companies, and other transportation trends and technologies. We have reviewed the proposed rule and put together some comments informed by our research and the broader scientific literature that we hope will be helpful. We will first present some detailed comments on modeling assumptions used to inform the proposed regulation and then comment on the overall policy design.

Please find our detailed comments attached.

Best regards,

Jeremy Michalek  
Professor of Engineering and Public Policy  
Professor of Mechanical Engineering  
Director, Vehicle Electrification Group  
Carnegie Mellon University  
jmichalek@cmu.edu

Matthew Bruchon  
PhD Student  
Department of Engineering and Public Policy  
Carnegie Mellon University  
mbruchon@andrew.cmu.edu

Attachment: 'www.arb.ca.gov/lists/com-attach/11-cleanmilesstandard-VTYGb1Y6UmwKaVM9.pdf'

Original File Name: Comment\_CARB\_Clean\_Miles\_Standard\_Bruchon\_Michalek.pdf

Date and Time Comment Was Submitted: 2021-05-17 13:07:26

No Duplicates.

**Comment 10 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Graham  
Last Name: Noyes  
Email Address: graham@noyeslawcorp.com  
Affiliation: Noyes Law Corporation

Subject: cleanmilesstandard - Comment of Pearson Fuels  
Comment:

Dear Clerk of the Board,

Attached please find the comments of Pearson Fuels regarding the proposed Clean Fuels Standard with accompanying exhibits. Please contact me if there are any problems with the transmission or questions relating to this submittal.

Thank you for your assistance.

Best Regards,

Graham

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(206)856-8784 Cell  
graham@noyeslawcorp.com

Attachment: 'www.arb.ca.gov/lists/com-attach/12-cleanmilesstandard-WipXNAFhAyILfgRr.pdf'

Original File Name: Pearson Fuels CMS Comment w Exhibits.pdf

Date and Time Comment Was Submitted: 2021-05-17 15:20:24

No Duplicates.

**Comment 11 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Cameron  
Last Name: Demetre  
Email Address: cdemetre@technet.org  
Affiliation: TechNet/CalChamber

Subject: TechNet and CalChamber Clean Miles Standard Comments  
Comment:

On behalf of TechNet and the CalChamber, please see our attached comment letter regarding CARB's rulemaking for the Clean Miles Standard. Thank you for your time and consideration!

Attachment: 'www.arb.ca.gov/lists/com-attach/13-cleanmilesstandard-V2JUfFNjUDcGLgg6.docx'

Original File Name: 5.14.21 Draft Regulation Comments-CalChamber.TechNet 11.30.docx

Date and Time Comment Was Submitted: 2021-05-17 15:13:11

No Duplicates.

**Comment 12 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Adam  
Last Name: Lenz  
Email Address: adamlenz@waymo.com  
Affiliation: Waymo

Subject: Waymo Comments on Proposed Clean Miles Standard  
Comment:

Please find attached Waymo's Comments on the Proposed Clean Miles Standard, timely filed today in accordance with the March 16, 2021 Notice issued by CARB.

Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/15-cleanmilesstandard-B3BcO1MrUW9ROFUK.pdf'

Original File Name: Waymo Comment Letter (CARB CMS - Proposed Regulation Order) [Final 05.17.2021].pdf

Date and Time Comment Was Submitted: 2021-05-17 16:10:38

No Duplicates.

**Comment 13 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: David  
Last Name: Weiskopf  
Email Address: david.weiskopf@nexgenpolicy.org  
Affiliation: NextGen California

Subject: NextGen California Comments on Clean Miles Standard  
Comment:

Attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/16-cleanmilesstandard-BWtTMgNhBTcBWAfi.pdf'

Original File Name: NGCA CMS Letter May 2021 with attachment.pdf

Date and Time Comment Was Submitted: 2021-05-17 16:56:35

No Duplicates.

**Comment 14 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Adam  
Last Name: Mohabbat  
Email Address: adam.mohabbat@evgo.com  
Affiliation: EVgo

Subject: EVgo Comments on Proposed Clean Miles Standard  
Comment:

Please see attached comment letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/17-cleanmilesstandard-BWZWPAdjUGJROQhX.pdf'

Original File Name: Clean Miles Standard Comments\_05.17.21\_EVgo.pdf

Date and Time Comment Was Submitted: 2021-05-17 18:37:07

No Duplicates.

**Comment 15 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Jamie  
Last Name: Hall  
Email Address: jamie.hall@gm.com  
Affiliation: General Motors

Subject: GM Comments on Clean Miles Standard  
Comment:

Please see attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/18-cleanmilesstandard-VjECaVcJWUGbVQn.pdf'

Original File Name: GM\_CMSCComment\_Final.pdf

Date and Time Comment Was Submitted: 2021-05-17 18:33:39

No Duplicates.



**Comment 16 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Nadia

Last Name: Anderson

Email Address: nadia.anderson@getcruise.com

Affiliation:

Subject: Cruise LLC Comments - Proposed Clean Miles Standard

Comment:

Please find attached Cruise comments to the Proposed Clean Miles Standard.

Attachment: 'www.arb.ca.gov/lists/com-attach/19-cleanmilesstandard-UGAGNVZ5BWdRYFB+.pdf'

Original File Name: 05.17.2021 Cruise Comments\_ Proposed Clean Miles Standard.pdf

Date and Time Comment Was Submitted: 2021-05-17 19:11:18

No Duplicates.

**Comment 17 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Darton

Last Name: Ito

Email Address: darton.ito@sfmta.com

Affiliation: SFMTA

Subject: CMS Regulation SF Comment Letter

Comment:

Thank you for the opportunity to comment on the Clean Miles Standard Regulation Order.

Attachment: 'www.arb.ca.gov/lists/com-attach/20-cleanmilesstandard-WjkBalUnUFwGcgBl.pdf'

Original File Name: CMS Regulation SF Comment Letter May 2021.pdf

Date and Time Comment Was Submitted: 2021-05-17 18:36:12

No Duplicates.

**Comment 18 for Proposed Clean Miles Standard (cleanmilesstandard) - 45 Day.**

First Name: Erin  
Last Name: Rodriguez  
Email Address: erodriguez@ucsusa.org  
Affiliation: Union of Concern Scientists

Subject: Public Comment on the Clean Miles Standard  
Comment:

Please see attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/21-cleanmilesstandard-VyUGb1w5WHkEa1I1.pdf'

Original File Name: rodriguez.pdf

Date and Time Comment Was Submitted: 2021-05-18 09:13:20

No Duplicates.

**Comment 1 for Proposed Clean Miles Standard (cleanmilesstandard). (At Hearing)**

First Name: Megan

Last Name: Richer

Email Address: [megan@ridewithvia.com](mailto:megan@ridewithvia.com)

Affiliation:

Subject: Via Comments on Clean Miles Standard

Comment:

Letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/22-cleanmilesstandard-BmUFYIQnBzYAWQhr.pdf](http://www.arb.ca.gov/lists/com-attach/22-cleanmilesstandard-BmUFYIQnBzYAWQhr.pdf)

Original File Name: CARB Clean Miles Standard\_Via Comments.pdf

Date and Time Comment Was Submitted: 2021-05-20 08:42:11

No Duplicates.

**Comment 2 for Proposed Clean Miles Standard (cleanmilesstandard). (At Hearing)**

First Name: Katerina

Last Name: Robinson

Email Address: katerina.robinson@sen.ca.gov

Affiliation: Office of Senator Nancy Skinner

Subject: CMS Letter

Comment:

Letter uploaded by CARB Staff on behalf of Katerina Robinson for Senator Nancy Skinner.

Attachment: [www.arb.ca.gov/lists/com-attach/23-cleanmilesstandard-AmEAaII2BzVWPgFe.pdf](http://www.arb.ca.gov/lists/com-attach/23-cleanmilesstandard-AmEAaII2BzVWPgFe.pdf)

Original File Name: Clean Miles Standard 5.19.21.pdf

Date and Time Comment Was Submitted: 2021-05-20 10:03:45

No Duplicates.

## **Comment 1 for Proposed Clean Miles Standard (cleanmilesstandard) - 15-1.**

First Name: Paul  
Last Name: Augustine  
Email Address: paugustine@lyft.com  
Affiliation: Lyft

Subject: Lyft Comments on Proposed Modifications to the Clean Miles Standard and Incentive Program

Comment:

Please find attached Lyft's comments on Proposed Modifications to the Proposed Regulation Order for the Clean Miles Standard and Incentive Program Regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/24-cleanmilesstandard-WzdXKFE2V3BXDIMw.pdf](http://www.arb.ca.gov/lists/com-attach/24-cleanmilesstandard-WzdXKFE2V3BXDIMw.pdf)

Original File Name: Lyft Comments on Final 15-Day Changes to CA Clean Miles Standard.pdf

Date and Time Comment Was Submitted: 2021-09-28 20:44:35

No Duplicates.

## **Comment 2 for Proposed Clean Miles Standard (cleanmilesstandard) - 15-1.**

First Name: Alexander  
Last Name: Larro  
Email Address: westregs@uber.com  
Affiliation: Uber Technologies, Inc.

Subject: Comments of Uber Technologies, Inc. on Proposed Modifications to the Clean Miles Standard

Comment:

To Whom It May Concern,  
Uber Technologies, Inc. submits the attached Comments on CARB's 15-Day Notice of Public Availability of Modified Text to the Clean Miles Standard Regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/25-cleanmilesstandard-USRcOFw4VXRXDIIIm.pdf](http://www.arb.ca.gov/lists/com-attach/25-cleanmilesstandard-USRcOFw4VXRXDIIIm.pdf)

Original File Name: Uber Technologies, Inc.'s Comments on CARB's 15-Day Notice of Public Availability of Modified Text to the Clean Miles Standard Regulation.pdf

Date and Time Comment Was Submitted: 2021-09-29 14:16:10

No Duplicates.

### **Comment 3 for Proposed Clean Miles Standard (cleanmilesstandard) - 15-1.**

First Name: Yi  
Last Name: Han  
Email Address: yi.han@woodward.com  
Affiliation: Woodward,Inc.

Subject: Comments to Carb regarding to Clean Miles Standard  
Comment:

Dear Carb board directors,

Please see attached file for our comments. It was a pleasure to share our point of views with you.

Best regards,

Yi Han

Attachment: [www.arb.ca.gov/lists/com-attach/27-cleanmilesstandard-UjFdNFU5V2lVNgJs.pdf](http://www.arb.ca.gov/lists/com-attach/27-cleanmilesstandard-UjFdNFU5V2lVNgJs.pdf)

Original File Name: Comments to Carb regarding to Clean Miles Standard.pdf

Date and Time Comment Was Submitted: 2021-09-29 14:15:46

No Duplicates.