

**Comment 1 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Stacy

Last Name: Calles

Email Address: cleanairgrants@gmail.com

Affiliation: CleanAir Grant Services

Subject: Increase CE Limit for CMP Marine Category

Comment:

Hello - it is important that staff conduct several CE calculations for the marine industry so they can understand the limitations posed by the upcoming CHC regulation. Once of which is meeting the CE cap of \$30,000 / ton of emission reductions. This CE cap MUST be increased similar to the other industries if CMP is going to serve as an aid in early compliance and upgrades. Many of the vessels will have 1-2 year project lives. Those that would have longer may have contracts already in place for their Tier 3 engines, so we will see more interest in destroying recently funded 2018-2021 model year engines in order to get a higher funding percentage with the longer project life. This will pose problems for the local air districts, with several applicants requesting to be released from contractual obligations so funding can be taken advantage of for the Tier 4 engines. This is a serious problem that must be addressed. Please see the emails sent to CARB regulatory and CMP staff.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-fundingplan2022-VTIFblMzADoEbgJd.pdf>'

Original File Name: Gmail - CMP Working Group\_Cost Effectiveness Input for Tug and Tow.pdf

Date and Time Comment Was Submitted: 2022-10-02 07:57:17

No Duplicates.

**Comment 2 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Bonnie

Last Name: Arbuckle

Email Address: trancegoddess2001@yahoo.com

Affiliation:

Subject: Proposed Carl Moyer Program Changes

Comment:

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<h1 class="yiv9341109611govd_header" style="background-color: #ffffff; line-height: 1.1; color: #208bbe; font-family: helvetica; margin: 0px;">Please Consider Approval of the Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives Accompanied by Proposed Carl Moyer Program Changes! Thank you.</h1>
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Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-10 17:46:01

No Duplicates.

### **Comment 3 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: John

Last Name: Younger

Email Address: johnkyounger@gmail.com

Affiliation: Marin Rowing Association

Subject: Expanding Programs - Include Replacing 25hp+ Outboard Engines with Electric  
Comment:

I am a Board Member of the Marin Rowing Association in Marin County (<https://www.marinrowing.org/>) where we have eight (8) gas powered outboard engines, 25hp to 50hp, to propel our coaching launches. We are the first organization in California to purchase and receive a 100% electric alternative for our first launch. This electric alternative to our 25hp gas engine has superior performance and is nonpolluting. In fact, we charge it with solar. Soon, we will be replacing the other 7 launches with an electric alternative.

Similar to 2012 when electric vehicles began to replace gas cars, there will be tens of thousands (or more) recreational and non-recreational boat owners in California who will want to transition to 100% electric outboard motors now that the technology exists and is commercially available. An example of it can be seen at [www.purewatercraft.com](http://www.purewatercraft.com).

CARB has done a wonderful job supporting the electrification of large marine vehicles transitioning from gas or diesel to hybrid or full electric. Up until now, there was no viable electric equivalent to replace outboard marine engines 25hp or greater for recreational and non-recreational vessels.

From CARB's site

(<https://ww2.arb.ca.gov/our-work/topics/oceangoing-vessels-harbor-craft>):

"From massive cargo ships to smaller harbor craft such as ferries and tug boats, marine vessels impact California's air quality. Over the past 10 years, California has enacted regulations to limit the pollution generated from these vessels, helping improve air quality in port-adjacent communities as well as further inland."

Just as CARB saw the value of providing incentives for these larger marine vessels to transition to electric once the technology became available, now is the time to expand programs to include replacing 25hp or greater gas outboard engines with electric. In fact, replacing each one of these gas outboard engines to electric has the equivalent impact of taking 125 gas burning cars off the road per year.

Here are the calculations to show the ecological benefit:

<https://www.purewatercraft.com/2019/08/07/a-thousand-cars-off-the-road/>

This is a formal request to expand CARB programs to include the dock wiring, purchase of electric alternatives (chargers and motors) and ongoing carbon benefit of replacing 25hp or greater gas outboard engines with 100% electric alternatives.

Some of the programs to expand may include:

- LCFS program

- (<https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard>)
- The

Carl Moyer Program  
(<https://ww2.arb.ca.gov/guidelines-carl-moyer>)&bull;  
Volkswagen Environmental Mitigation Trust for California  
(<https://ww2.arb.ca.gov/our-work/programs/volkswagen-environmental-mitigation-trust-california>)&bull; Bay Area Air Quality Management District  
(<https://www.baaqmd.gov>)  
There is also an opportunity to model a program similar to the  
Clean Vehicle Rebate Project (<https://cleanvehiclerebate.org/en>) to  
help transition away from these high polluting outboard engines as  
it did for EV adoption.  
The board of MRA extends a huge thank you to CARB for  
continuing to push for cleaner air in California. Your  
consideration of this matter, which seems in line with CARB's  
mission, is greatly appreciated. Please feel free to reach out  
to me directly should you have any questions or if you would like  
to take a ride on our electrified launch.  
Sincerely, John Younger  
Board Member  
Marin Rowing Association  
[johnkyounger@gmail.com](mailto:johnkyounger@gmail.com)

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-fundingplan2022-WzhWMV0uVmcGXwNv.pdf>'

Original File Name: CARB Letter for Public Hearing.pdf

Date and Time Comment Was Submitted: 2022-10-11 10:31:43

No Duplicates.

**Comment 4 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Jed A.

Last Name: Hendrickson

Email Address: jedhendrickson@gmail.com

Affiliation:

Subject: Oppose funding plan

Comment:

I oppose all regulation directed by CARB. Unelected bureaucrats should not be allowed to exercise such authority. This only belongs to the legislature.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-10-15 14:27:18

No Duplicates.

## **Comment 5 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Graham

Last Name: Balch

Email Address: graham@greenyachtsales.com

Affiliation: Green Yachts

Subject: Policy Recommendations for Decarbonizing the Marine Sector

Comment:

Green Yachts is pleased to submit six policy recommendations that we believe would accelerate California's transition to a decarbonized future by facilitating the transition to zero-emission technology in the marine sector.

The six policy recommendations listed below are detailed in the attached document with explanation, analysis and rationale for each.

Recommendation #1: Regarding CORE and any future CARB funding program, treat zero-emission platforms differently than ICE platforms. A zero-emission platform on a vessel that is augmented by an ICE generator is still the platform for a decarbonized future that is easily modified as technology develops. This is consistent with state policy in the state of Washington and could begin to create a national standard that advances zero-emission platforms.

Recommendation #2: Change surplus emissions funding strategy because it doesn't work for zero-emission requirements and it punishes vessel operators who have upgraded to cleaner engines.

Recommendation #3: Create a valuation for GHG emission reductions in Moyer funding and all California funding programs.

Recommendation #4: Update Moyer funding guidelines for zero-emission (labeled as hybrid in the Moyer guidelines) projects so that total cost of a zero-emission project is eligible.

Recommendation #5: Due to the high cost and long time-frames of a zero-emission repower, distribute funding during the conversion to zero-emission platform at defined project milestones instead of as one lump reimbursement at project completion. Or as a lesser substitute, provide a zero-interest loan until project completion.

Recommendation #6: Transfer clean engines to recipient vessels in developing nations or states with no/low emission standards instead of spiking them.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-fundingplan2022-UjVXIwNnU2UAaAdY.pdf>'

Original File Name: Green Yachts Clean Transportation Suggestions.pdf

Date and Time Comment Was Submitted: 2022-10-24 21:54:38

No Duplicates.

**Comment 6 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Aidan

Last Name: Geronimus

Email Address: ageronimus@jobstomoveamerica.org

Affiliation: Jobs To Move America

Subject: HVIP Suggestions For Job Standards

Comment:

Please find our coalition's suggestions attached below, thanks so much for your attention to this matter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-fundingplan2022-UDNcaF0xiBGVhM0d.pdf'

Original File Name: HVIP Proposal\_JMA Coalition\_10.26.2022.docx.pdf

Date and Time Comment Was Submitted: 2022-10-26 11:19:47

No Duplicates.



**Comment 7 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Roman

Last Name: Partida-Lopez

Email Address: romanpl@greenlining.org

Affiliation:

Subject: Charge Ahead Coalition Comment Letter on FY 22-23 Funding Plan  
Comment:

Please accept the Charge Ahead Coalition comment letter on the proposed FY 22-23 Funding Plan

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-fundingplan2022-VWdXYQY1B2YLPFBg.pdf'

Original File Name: 20221031\_CAC Comment Letter - Proposed FY 22-23 Funding Plan for CTI.pdf

Date and Time Comment Was Submitted: 2022-10-31 14:56:56

No Duplicates.

**Comment 8 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: James

Last Name: Becker

Email Address: jbecker@richmondcf.org

Affiliation: Richmond Community Foundation

Subject: Public Comments for Clean Transportation Incentives

Comment:

Greetings,

We have been involved with bringing Electric Vehicle Car Sharing programs to low income communities in Contra Costa County. These programs provide an affordable alternative to gas powered vehicles to communities - particularly in communities like Richmond and Antioch, California, that sit between major commute areas and suffer from high asthma rates due to idling vehicles during rush hour. Since many of these communities cannot purchase an electric or hybrid vehicle. the EV Car Sharing is a great alternative and I would recommend expanding funding in this area.

Thank you.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-11-07 11:27:50

No Duplicates.

**Comment 9 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Jane

Last Name: Culkin

Email Address: jane@highlandfleets.com

Affiliation: Highland Fleets

Subject: Highland Comments - CARB FY 2022-2023 Funding Plan for Clean Transportation  
Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-fundingplan2022-VDwGaVM1VW4EblAx.pdf'

Original File Name: Highland\_CARBTransportationFunding\_11722.pdf

Date and Time Comment Was Submitted: 2022-11-07 15:07:47

No Duplicates.

**Comment 10 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Brad

Last Name: Engel

Email Address: bengel@flagshipsd.com

Affiliation: Flagship Cruises and Events

Subject: CORE Program Modifications needed for Commercial Harbor Craft

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-fundingplan2022-UTdSOFEWGwAdQhg.pdf'

Original File Name: Flagship letter to CARB FINAL.pdf

Date and Time Comment Was Submitted: 2022-11-08 13:42:05

No Duplicates.

**Comment 11 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Erika

Last Name: Romero

Email Address: erika@caleec.com

Affiliation: Environmental and Energy Consulting

Subject: RE: Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives  
Comment:

Please see the attached letter:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/15-fundingplan2022-UzBXMFc6ACUDZABu.pdf'

Original File Name: CalVans Letter to CARB (2).docx.pdf

Date and Time Comment Was Submitted: 2022-11-08 13:36:05

No Duplicates.

**Comment 12 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Bonnie

Last Name: Trowbridge

Email Address: btrowbridge@zeemsolutions.com

Affiliation: Zeem Solutions

Subject: Support for Proposed Funding Plan for Clean Transportation Incentives

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-fundingplan2022-BTdQZAExVTdQZggw.pdf'

Original File Name: 221108\_CARBFundingplan2022-23.pdf

Date and Time Comment Was Submitted: 2022-11-08 14:51:46

No Duplicates.

**Comment 13 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Greg

Last Name: Hurner

Email Address: greg@hgra.us

Affiliation: Sportfishing Assn of CA, GGFA

Subject: Funding Plan Comments

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-fundingplan2022-VTYHbVI2AjBXPwhX.pdf'

Original File Name: Clean Transportation Incentives Plan Comments FINAL.pdf

Date and Time Comment Was Submitted: 2022-11-09 10:50:57

No Duplicates.

**Comment 14 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Cesar

Last Name: Diaz

Email Address: cesar.diaz@chargepoint.com

Affiliation:

Subject: Comments in Support of 2022-23 Funding Plan for Clean Transportation Incentives

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-fundingplan2022-VTZXOVw8U3IAYVcy.pdf'

Original File Name: ChargePoint Comments on CARB 2022-2023 Funding Plan Card Program.pdf

Date and Time Comment Was Submitted: 2022-11-10 14:28:39

No Duplicates.



## **Comment 15 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Nate

Last Name: Capra

Email Address: natecapra@balboaislandferry.com

Affiliation:

Subject: Comments on behalf of the Balboa Island Ferry

Comment:

The Balboa Island Ferry is one of the 15 short-run ferries that will be required to be zero-emission by December 31, 2025 under the amended Commercial Harborcraft regulations. Beyond the regulations, we are committed to moving into the future and being on the right side of history by converting to electric power. While we have an incredible historical presence in California as being 100+ year old business, our focus now shifts to the NEXT 100 years. It is our hope to not only improve our relationship with the marine ecosystem by eliminating emissions, but also be at the forefront leading the maritime community in this transition.

With that in mind we would like to submit the following recommendations with the intention of better enabling small business like ourselves to make this dream a reality of converting our vessel to zero-emission and reducing climate change in California.

Recommendation #1: As new goals become a possibility, we ask that there be a reevaluation of Moyer funding in regards to surplus emissions. As it stands now, Moyer funding is only available to operators who are able to reduce their emissions BELOW what is required. That unfortunately eliminates all help for business that have to reduce to zero emissions. Zero emissions should be the gold standard we all strive for, but in its current state Moyer actually disincentivizes such an ideal by only funding those who reduce instead of eliminate emissions.

Recommendation #2: Include CO2 and CH4 emissions in Moyer funding valuations. Currently there is only Moyer funding based on a reduction of NOx, ROG, and PM. By including CO2 and CH4 in Moyer's emission evaluation, it will incentivize the industry to move towards zero emissions.

Recommendation #3 Reevaluate dispersal of to smaller payments based on achieving project milestones. Currently funding is presented as an end-of-project reimbursement in one lump sum. While helpful to larger entities that can (at least temporarily) shoulder the burden of cost for their repower, it still creates a situation that could be potentially unsurvivable for smaller qualified groups that can only move forward with at least partial funding from the start. This is especially true for zero-emission projects that take longer and cost significantly more if CARB wants a zero-emission project to be equally viable for a

vessel operator as a diesel repower.

By shifting towards a milestone based reward system, CARB would actually be making smart, safe investments that run parallel with demonstrable feedback and results as repowering moves forward. By incrementally funding from start to finish using USCG approvals, CARB would also be insulating itself from possible liability by ensuring only vessels that meet the USCG's strictest safety guidelines get funding.

Recommendation 4: Evaluate the need to bring current Moyer verbiage and categorization up to date by defining "Zero-Emission Platforms" as its own term and no longer categorize it under the "Hybrid" category.

Our hope is, by properly defining a Zero-emission Platform, total cost of such a massive undertaking can be properly taken into account for full funding.

Recommendation 5: When converting to a Zero-emission Platform, it is necessary to take into account the drastic difference in time needed for conversion compared to a simple diesel repower. Typically, a vessel is out of service for half a year to complete conversion, crew training, and certification by the USCG. Some commercial vessels have taken two years after the conversion to get the USCG COI. We would like CARB to consider business lost during this time to be eligible for funding, so that smaller business like our own can not be disproportionately disrupted by converting to zero-emission compared to an operator with half the business disruption doing a diesel repower.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-11-10 15:36:57

No Duplicates.

## **Comment 16 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Edward  
Last Name: Manning  
Email Address: emanning@ka-pow.com  
Affiliation:

Subject: Support of Agenda item 22-15-5: Public Meeting to Consider the Proposed Fiscal Year 2022-2

Comment:

On behalf of Catalina Channel Express, Inc., please see attached letter in support of Agenda item 22-15-5: Public Meeting to Consider the Proposed Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives Accompanied by Proposed Carl Moyer Program Changes.

Thank you.

<h3 style="margin-left: 35.3pt;"> </h3>

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-fundingplan2022-AGNdOAdjBQkBdFUg.pdf'

Original File Name: CCE Support ltr CARB funding plan 11-10-22 FINAL.pdf

Date and Time Comment Was Submitted: 2022-11-10 15:46:09

No Duplicates.

**Comment 17 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Andy

Last Name: Schwartz

Email Address: anschwartz@tesla.com

Affiliation: Tesla, Inc.

Subject: Tesla, Inc.'s Comments on the 2022-23 Funding Plan for Clean Transportation Incentives

Comment:

Attached please find Tesla, Inc.'s comments on the Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-fundingplan2022-USVcPwByU2wDZAhX.pdf'

Original File Name: Tesla Comments on 2022-23 Funding Plan\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-11-11 16:59:11

No Duplicates.

**Comment 18 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Margaret  
Last Name: McDonogh  
Email Address: maggie@angelislandferry.com  
Affiliation: Angel Island Ferry

Subject: Comment for 2022-23 Funding Plan  
Comment:

Hello - Please find attached my comments and suggestions.  
Thank you.  
Maggie

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-fundingplan2022-AGwBYlwpUnVRMgZ0.pdf'

Original File Name: Letter to CARB for 2022-23 Fiscal Requirements.pdf

Date and Time Comment Was Submitted: 2022-11-13 15:47:22

No Duplicates.

## **Comment 19 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Troy

Last Name: Musgrave

Email Address: troy.musgrave@godependable.com

Affiliation: Dependable Highway Express

Subject: Hybrid and Zero Emission Truck and Bus Voucher Incentive Program (HVIP)

Comment:

November 14,  
2022  
California Air  
Resources Board  
1001 I Street

Sacramento, CA  
95814

Chair Randolph and  
Members of the Board:

I am writing to express my concerns regarding the provisions related to the Hybrid and Zero Emission Truck and Bus Voucher Incentive Program (HVIP) that are included in the Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives, currently pending before you. Dependable Highway Express is committed to transitioning to Zero Emission Vehicles (ZEVs), recognizing the environmental and public health impacts, both local and global, of our fleet operations. However, there is currently very limited experience utilizing ZEVs in the medium and heavy-duty (MD/HD) context given the relatively small number and type of vehicles that are commercially available for purchase, the comparatively higher upfront cost of ZEVs, and the widely recognized challenges that charging poses. CARB has generally recognized these issues and sought to prime the market via programs like HVIP, which expressly attempts to overcome these various challenges by providing incentives that serve to partially offset the various, cost, technology, and operational risks that entities assume in taking early action to incorporate ZEVs into their fleets. I am deeply appreciative of CARB's historical support for initial investments in these vehicles. This support is critical in motivating fleet operators, regardless of size, to invest in ZEVs in these early days of the ZEV transition.

Unfortunately, the draft Funding Plan, de facto cuts larger fleets, defined as those with more than 500 vehicles, out of the program by imposing a set of conditions that will dramatically limit the ability of these fleets to utilize HVIP funding. The condition that is particularly problematic is the bulk purchase requirement, pursuant to which a fleet operator will only receive HVIP incentives for battery electric vehicle (BEV) purchases in excess 30 vehicles (fuel cell vehicles are exempt). Notably, this condition is uniquely applied to larger fleets. The practical reality is that this requirement

creates an unreasonable barrier to large fleet operators and serve to effectively eliminate them from the program. Rather than serving to accelerate or increase their investment in ZEVs, this condition, by eliminating a valuable source of funding support, will instead reduce the ability and appetite of larger fleets to do so.

Like any fleet operator, larger fleets need to gain some initial experience with ZEVs before making wholesale commitments to what is very much an emerging and largely untested technology. The bulk purchase requirement sets an unrealistic bar to accessing HVIP incentives. Very few fleet operators, if any, will be able or willing to purchase 30 vehicles in order to be able to utilize HVIP incentives in light of the substantial costs and risks this entails and the dramatically reduced value of the incentive on a per vehicle basis when the initial set of non-incentivized vehicles are factored in.

For the forgoing reason we respectfully ask that CARB eliminate this condition uniquely applied to fleets with more than 500 vehicles. We fully recognize the need to transition to ZEVs in the years ahead and are willing to work in partnership with the state to make those investments. However, given the substantial costs and risks ZEVs currently engender, programs like HVIP remain an essential driver, even for the largest fleets, of early-stage interest and investment in this critically important but still emerging technology.

Troy Musgrave  
Director of Process Improvement  
Troy.Musgrave@godependable.com

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-fundingplan2022-VT0Bf1Y1V3YCbVQw.docx>'

Original File Name: Hybrid and Zero Emission Truck and Bus Voucher Incentive Program (HVIP) Letter.docx

Date and Time Comment Was Submitted: 2022-11-14 07:25:23

No Duplicates.

## **Comment 20 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Brent

Last Name: Coffey

Email Address: brent.coffey@sunbeltrentals.com

Affiliation:

Subject: CARB 2022 Board Meeting: Sunbelt Rentals Public Remarks

Comment:

I PLAN TO READ

THE FOLLOWING COMMENTS AT THE MEETING:

Hello. My name is Brent

Coffey and I represent Sunbelt Rentals as a leader of our Fleet Team. Thank you for

the opportunity to share a little about our organization and how we are thinking about the program CORE has introduced to enhance the penetration of Zero-Emissions products in the state of California.

Sunbelt Rentals operates

nearly 1,200 locations across North America, with over 100 of those located right here in California. Additionally, we operate over 160 locations across the UK and Ireland,. With over \$15B of fleet owned globally, we are one of the largest single owners of combustion engines in the world. However, we are also an active investor and market leaders of Zero-Emission equipment to serve the rental industry which touches all things construction and non-construction.

Sunbelt takes

Zero-Emissions seriously. So seriously that we have aligned ourselves alongside our OEM partners to develop zero-emissions products to ensure they meet the stringent demands of our customers. There is no better example than the newest introduction of Zero-Emissions products to our fleet, as well as the State of California, than the Bobcat T7X All-Electric Compact Track Loader. Sunbelt and Bobcat spent close to 3 years co-developing this product on customer jobsites throughout the country and in the harshest of environments. One of those jobsites was the Edwards & Sanborn solar and energy storage project located here in California, just outside of Mojave, CA. Not only is it the largest single-site solar and energy storage projects in the world, but it is also one of the harshest environments to operate equipment. It was only fitting that we proved out this product in a zero-emissions environment that would push the product to its limits. The good news&hellip;..it passed the test. The better news&hellip;..it is now available in our fleet for customers and jobsites to use. In fact, the first one off the production line landed in our West Sacramento location about 1 month ago and many more are on their way.

The T7X was one of the

few products that qualified for the CORE program in 2022. Because of its advanced technologies, costs have always been one of the concerns when it comes to gaining traction in the marketplace. Bobcat worked hard to get the product CORE-qualified, and Sunbelt made the investment. As a result, Sunbelt is allocating a



substantial portion of the T7X's we are purchasing to the California market. The CORE program has closed the cost-gap to a point that end-users can now rent these products at a price-point comparable to the diesel alternative in California. In doing so, we are already seeing demand grow and expect this trend to continue for the foreseeable future. We continue to support other zero emission products through continued investments in energy storage, alternative fuel power generation and advanced charging solutions to ensure these products reach maximum productivity regardless of the jobsite.

Our customers, who range from Fortune 500 companies to the local homeowners and we are confident they have great interest and support for zero emissions products. However, they often times view them as risky as these products and solutions are an area requiring significant education and awareness. The concerns voiced in the past including reliability availability, practicality and cost. This is why we are confident the rental industry is best suited to tackle this head on and create space for companies, cities and consumers to rely on companies like Sunbelt Rentals to fill this void. It is the rental channel

that eliminates the ownership cost premium, provide direct access to manufacturers, eliminate investment as well as the infrastructure to support power and charging. This has not only placed Sunbelt in the position of developing and investing in the fleet but also serving as an advisor to companies, contractors and other customers on how to effectively run a jobsite on-time and on-budget, with as few emissions as possible.

Looking forward, Sunbelt continues to lead the construction industry in the advancement and investments in Zero-Emissions products. Not only is it part of our corporate strategy, it is a demand from our customers and a commitment we have made as market leaders and stewards of the environment. Our relationship with CARB and the CORE program has already been instrumental in the expansion of Zero-Emissions products in the State of California and we are already working together jointly on what is coming next. Sunbelt, and our customers, are thankful for the investments made by the state and we will continue to be a partner with CARB in the future to bring technology to the market that reduces greenhouse gases while improving productivity and safety.

Thank you for the opportunity.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-11-14 06:45:20

No Duplicates.

**Comment 21 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Charles

Last Name: Helget

Email Address: chelget@republicservices.com

Affiliation: Republic Services

Subject: Comments - Proposed 2022-23 Funding Plan - Clean Transportation Incentives

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-fundingplan2022-UyFUIVQKU2MFbFM+.pdf'

Original File Name: RS Comment-CARB Funding Plan\_11-14-22\_000072.pdf

Date and Time Comment Was Submitted: 2022-11-14 09:08:30

No Duplicates.

## **Comment 22 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Christopher

Last Name: Whitmore

Email Address: cwhitmore@richmondpromise.org

Affiliation: Richmond Promise, Inc

Subject: Richmond Moves Electric On Demand Shuttle Testimonial

Comment:

"For me, Richmond Moves is much more than an affordable and environmentally friendly transportation option in my hometown. Each Richmond Moves van also serves as a small community gathering space. Each time that I've used the on-demand shuttle service I've met someone new in our community. I've shared a ride with a Richmond native who recently moved back home after a decade away and just started a job working for a city department. I've commuted with a new Richmond resident who uses Richmond Moves as an opportunity to learn about their new city. I've conversed with drivers who don't hesitate to share their excitement for the new shuttle service and the opportunities it presents to our community. As a lifelong Richmond resident, I hope that my community will continue to be a leader in climate action. I hope that we continue to prioritize equitable mobility, and I hope that we can continue to bring our diverse community together in ways that benefit and strengthen us all. Richmond Moves represents these goals and more, and I'm excited to see how the shuttle service's impact will expand with additional resources."

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-11-14 11:53:32

No Duplicates.

**Comment 23 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Tucker

Last Name: Perkins

Email Address: tucker.perkins@propane.com

Affiliation: Propane Education & Research Council

Subject: Comment on the CARB Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives

Comment:

On behalf of the Propane Education & Research Council (PERC), thank you for the opportunity to provide comments on the California Air Resources Board's (CARB) proposed Fiscal Year (FY) 2022-23 Funding Plan for Clean Transportation Incentives. Our comment letter is attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-fundingplan2022-B3dVNIEiUWFRCAUo.pdf'

Original File Name: PERC - CARB FY23-23 Funding Plan - Comment Letter\_final11142022.pdf

Date and Time Comment Was Submitted: 2022-11-14 12:08:14

No Duplicates.

**Comment 24 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Janelle

Last Name: London

Email Address: JANELLE@COLTURA.ORG

Affiliation: Coltura

Subject: Coltura Comments on the 2022-2023 Funding Plan for Clean Transportation Incentives  
Comment:

Please see the attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-fundingplan2022-U2EBNVBgUjBXYFJm.pdf'

Original File Name: 221114 Coltura Public Comment CARB proposed funding plan for FY 2022-2023.pdf

Date and Time Comment Was Submitted: 2022-11-14 12:20:18

No Duplicates.

## **Comment 25 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Nilda

Last Name: Parrado Langston

Email Address: toursxinfo@gmail.com

Affiliation: ToursX, LLC

Subject: Improved funding options for Marine Sector

Comment:

ToursX, LLC is a small company with operation in Southern California, specifically Long Beach. The only latina owned marine operation in the area. We offer sightseeing Eco-tours, entertaining while educating our passengers about water pollutions and human impact on the marine environment.

It is with great enthusiasm that I submit this comments, hoping that the vision of operators like me, to have cleaner emissions, can meet the reality of the costs of achieving such vision. An aggressive agenda, requires aggressive funding.

Unfortunately I have not been able to receive much funding for our engine upgrade, currently a 25% of the cost of main engines alone, grant from Carl Moyer, which for an operator my size implies a large debt on the rest of the costs associated with this project, Debt hard to amortize in 6 years when time meets regulation to scrap vessel (no Tier 4 for fiber glass)

Arbitrary regulation and funding requirements that have no practical application, is a burden and a waste of resources for the taxpayer and the state. Making access to funding needs to be streamlined.

Please consider projects and funding individually for the actual impact of each project on cleaner air; hybrid options; upfront or gradual funding to ease into the project costs as progress is made; repurposing or recycling of removed equipment as to avoid creating more trash and wastefulness.

I respectfully request that CARB also includes in the board representatives from the marine sector that have skin in the game and can contribute their knowledge to the regulation.

I thank you for your time,  
Best regards,

Nilda Parrado Langston

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-11-14 11:46:30

No Duplicates.

## **Comment 26 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Kiran

Last Name: Agarwal

Email Address: kiranagarwal10@hotmail.com

Affiliation: Richmond Commission on Aging -member

Subject: Richmond Moves Electric On Demand Shuttle Testimonial

Comment:

"I am a student and a senior citizen.

As a regular college going student, I need "Richmond Moves" service. And as a student I know that many of us attending the college, use the public transport to get to college.

With Richmond moves, I don't need to change buses. As you know waiting time for the buses is enormous. And with the policy of the AC Transit, the burden of bus fare is enormous.

I am so glad that city of Richmond has decided to support us with this new service and technology. Already members of Commission on aging are using this service, and I hope, with your support, the program will soon expand to my neighborhood.

I need public transport to get to Bart, to go to medical facilities and to get groceries. I want to add social visits. Visiting my children is also essential and reliable on demand intercity transport throughout Richmond is very much needed.

Today, I walk 1 mile to reach the bus stop.

This service picks me up at my street corner. You do understand this from a senior person's view how important this service is to provide additional service that the fixed route buses cannot.

I will be glad to appear before you and explain my difficulties. This is excellent transportation solution."

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-11-14 13:23:26

No Duplicates.

**Comment 27 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Tom

Last Name: Van Heeke

Email Address: tvanheeke@rivian.com

Affiliation: Rivian Automotive, LLC

Subject: Comments on Proposed Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives

Comment:

Rivian is pleased to submit the attached comments on the proposed Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives. We thank staff for their hard work in developing the plan and appreciate this opportunity to comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-fundingplan2022-UiBWOQN0AzkFYgJs.pdf>'

Original File Name: Rivian\_FundingPlanComments\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-11-14 13:34:14

No Duplicates.



**Comment 28 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Amanda

Last Name: Steele

Email Address: amandas@seiu2015.org

Affiliation: SEIU Local 2015

Subject: SEIU Local 2015 Comments

Comment:

Please see attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-fundingplan2022-AnFVNIM7AiQHXLc7.pdf'

Original File Name: SEIU Local 2015 CARB Comments 11\_14\_22.pdf.pdf

Date and Time Comment Was Submitted: 2022-11-14 15:48:08

No Duplicates.

**Comment 29 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Michael

Last Name: Johnson

Email Address: Michael\_Johnson@pashanet.com

Affiliation:

Subject: Pasha Group Comments on LCT Funding Plan

Comment:

See attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-fundingplan2022-AHBdOlQmAjkDZFMm.pdf'

Original File Name: Pasha Group Letter\_ARB LCT Plan\_Nov 2022 \_FINAL.pdf

Date and Time Comment Was Submitted: 2022-11-14 16:30:53

No Duplicates.

**Comment 30 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Jarrett

Last Name: Stoltzfus

Email Address: jstoltzfus@proterra.com

Affiliation:

Subject: Proterra Comments on LCT Funding Plan

Comment:

Comment letter attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-fundingplan2022-UiJQJANtBCMBYgh6.pdf'

Original File Name: Proterra LCT Letter\_Nov 2022\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-11-14 16:33:41

No Duplicates.

**Comment 31 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Megan

Last Name: Richer

Email Address: megan@ridewithvia.com

Affiliation:

Subject: Via comments on LCT Funding Plan

Comment:

Letter attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-fundingplan2022-VSMBblc3VFgGbAhr.pdf'

Original File Name: VIA LCT Funding Plan Letter\_Nov 2022 FINAL.pdf

Date and Time Comment Was Submitted: 2022-11-14 16:35:35

No Duplicates.

**Comment 32 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Alexander

Last Name: Oki

Email Address: info@purewatercraft.com

Affiliation:

Subject: Incentivizing zero-emission marine propulsion

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-fundingplan2022-WjldOIMgUWADWghk.pdf'

Original File Name: CARB Letter 221114.pdf

Date and Time Comment Was Submitted: 2022-11-14 16:37:21

No Duplicates.

**Comment 33 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Chuma

Last Name: Ogunwole

Email Address: chuma@flypyka.com

Affiliation:

Subject: Pyka Inc. Comments on LCT Funding Plan

Comment:

Comment letter attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-fundingplan2022-AnJVKgFrBTcAWVQ1.pdf'

Original File Name: Pyka ARB Letter\_Draft\_Nov 2022\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-11-14 16:37:07

No Duplicates.

**Comment 34 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Kristian

Last Name: Corby

Email Address: kristian@caletc.com

Affiliation: Coalition Comments

Subject: Coalition Letter on HVIP and Large Fleet Eligibility

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-fundingplan2022-VzRQOQFhBDsGaVIm.pdf'

Original File Name: Coalition Letter re HVIP and large fleet eligiblity 11142022 Final.pdf

Date and Time Comment Was Submitted: 2022-11-14 16:40:26

No Duplicates.

**Comment 35 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Brian

Last Name: Robb

Email Address: Brian.Robb@thelionelectric.com

Affiliation:

Subject: Lion Comments on LCT Funding Plan

Comment:

See letter attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-fundingplan2022-VDgFagdpWWQHxgdh.pdf'

Original File Name: Lion FY 22\_23 LCT Letter\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-11-14 16:41:31

No Duplicates.



**Comment 36 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Kristian

Last Name: Corby

Email Address: kristian@caletc.com

Affiliation: CalETC

Subject: CalETC's Comments on Proposed FY2022-23 Funding Plan

Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-fundingplan2022-VTYHYFc6AjRQIIQ3.pdf'

Original File Name: CalETC Comments Re CARB Draft Investment Plan for FY 2022-23 November Final.pdf

Date and Time Comment Was Submitted: 2022-11-14 16:42:47

No Duplicates.

**Comment 37 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: David

Last Name: Maistros

Email Address: dmaistros@cityofavalon.com

Affiliation: City of Avalon

Subject: Letter of Support for the Catalina Express and the Proposed CARB Funding Plan  
Comment:

See attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-fundingplan2022-Uz8AYwB1AiUKaQI7.pdf'

Original File Name: Letter of Support Catalina Express Carb Funding.pdf

Date and Time Comment Was Submitted: 2022-11-14 16:36:27

No Duplicates.

## **Comment 38 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Geoffrey  
Last Name: Rusack  
Email Address: geoff@scico.com  
Affiliation: Catalina Island Company

Subject: Support for the Funding Plan for Clean Transportation Services  
Comment:

The  
Catalina Island Company  
P.O. Box 737  
Avalon, California 90704

November 14, 2022

Liane  
Randolph  
Chair, California Air Resources Board  
1001 I Street, #2828

Sacramento, CA 95814  
Dear Chair Randolph:  
On behalf of the Catalina Island Company  
(ICO), I am writing in support of the California Air Resources  
Board's Proposed  
Fiscal Year 2022-23 Funding Plan for Clean Transportation  
Incentives.

ICO is a privately owned company, that was formed  
over 100 years ago.  
It is the largest employer on the Island and engages in,  
among other things, activities, hospitality, visitor and local  
services and much more.

The island in general and ICO in particular  
depends highly on the services provided by Catalina Channel Express  
(CCE) and we believe this proposed funding plan will greatly assist  
this transportation service in secure new engines and new boats  
that will meet the new emissions standards.

From what I understand, the California legislature recently appropriated \$20 million from the Greenhouse Gas Reduction Fund (GGRF) and \$40 million from the General Fund for Commercial Harbor craft, specifically referencing privately operated common carrier ferries regulated by the PUC. Based on this legislative action, CARB staff is proposing spending a total of \$60 million for Demonstration and Pilot Projects for Commercial Harbor Craft.

ICO supports  
this recommendation and understands that CCE is ready to move  
forward with the purchase of a Tier IV compliant passenger ferry  
and intends to remove three existing ferries with older engines

from service thus reducing both criteria pollutants and GHG emissions. But there needs to be sufficient state funding available to make this purchase a reality. As acknowledged previously by CARB staff, CCE can't feasibly retrofit existing vessels with Tier IV engines and after-treatment due to the fact that additional size and weight constraints would lead to a 50% reduction in passenger capacity. Consequently, CCE must instead purchase new ferry vessels. Each new vessel will cost approximately \$20 million, and the cost is not financeable or recoverable through passenger fares. It would cost CCE approximately \$120 million to replace the entire CCE fleet with Tier IV compliant vessels.

With adequate state funding, CCE would be able to achieve early compliance, emission reductions ahead of schedule and ensure Catalina Island's future economic security. ICO wants to ensure that CARB's proposed funding plan leads to adequate funding being made available to privately operated ferries regulated as common carriers by the PUC operating on essential routes. We support the staff proposal.

Sincerely,

Geoffrey Claflin Rusack  
President and CEO  
Catalina Island Company

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-11-14 16:54:55

No Duplicates.

**Comment 39 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Sasan

Last Name: Saadat

Email Address: ssaadat@earthjustice.org

Affiliation: Earthjustice

Subject: EJ and Public Health Coalition Comments on Funding Plan

Comment:

Thank you for considering our comments on the FY 22-23 Funding Plan.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-fundingplan2022-UDNWMVMgUWADWgJk.pdf'

Original File Name: CARB Funding Plan Comments 11-14-2022.pdf

Date and Time Comment Was Submitted: 2022-11-14 17:12:34

No Duplicates.

**Comment 40 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Garrett

Last Name: Pewe

Email Address: gpewe@cahuilla.net

Affiliation: Cahuilla Band of Indians Public Works De

Subject: CARB Comments

Comment:

Please find attached comments for review.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-fundingplan2022-AGMBZgNwV2YLUgJh.pdf'

Original File Name: CARB Comments.pdf

Date and Time Comment Was Submitted: 2022-11-14 17:24:04

No Duplicates.

**Comment 41 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Jack

Last Name: Clark

Email Address: JClark@ideanomics.com

Affiliation: Ideanomics

Subject: Accelerating Transportation Electrification and Emissions Reductions through HVIP  
Comment:

Please find our comment letter attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-fundingplan2022-B24GZFQwUGIFbVM8.pdf'

Original File Name: Ideanomics\_CARB comments\_11.14.22.pdf

Date and Time Comment Was Submitted: 2022-11-14 19:57:48

No Duplicates.

**Comment 42 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Rodger

Last Name: Talstra

Email Address: rtalstra@cryologistics.ca

Affiliation: CryoLogistics Refrigeration Technologies

Subject: Allow CORE incentive eligibility based on function and benefits

Comment:

Eligibility for purchase incentives is categorized by equipment type and not purpose. To be more flexible and allow access to funding for new and innovative equipment which may not fit into an existing category, CORE should add an eligibility clause to each category. I suggest a clause such as: "Alternate equipment which performs the same function will also be considered."

Also, equipment that does not have a direct equivalent, is zero-emission, and reduces emissions by providing a hybrid solution should be considered based on environmental benefits.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2022-11-14 20:58:30

No Duplicates.



**Comment 43 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022) - Non-Reg.**

First Name: Michael

Last Name: Pimentel

Email Address: michael@caltransit.org

Affiliation: California Transit Association

Subject: California Transit Association - Funding Plan for Clean Transportation Incentives  
Comment:

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-fundingplan2022-BmVQIgBgBAhSMgJ7.pdf'

Original File Name: CTA FY 2022-23 Funding Plan for Clean Transpo Incentives.pdf

Date and Time Comment Was Submitted: 2022-11-14 22:43:18

No Duplicates.

**Comment 1 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022). (At Hearing)**

First Name: Edric

Last Name: Guise

Email Address: edric.guise@vireoenergy.com

Affiliation:

Subject: Please Add Funding Category for Pollution Control Barges; OGV At Berth Regulation  
Comment:

<p>Regarding agenda item 22-15-5 and on behalf of Greener Port Solutions, we submit the attached letter for consideration at CARB's 11/17/22 meeting. Thank you.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-fundingplan2022-B2ZQMQRgBDkEZgNi.pdf>

Original File Name: Agenda Item 22-15-5 - Greener Port Solutions - 11-17-22 CARB Meeting.pdf

Date and Time Comment Was Submitted: 2022-11-17 08:42:24

No Duplicates.

**Comment 2 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022). (At Hearing)**

First Name: Sara

Last Name: Broyles

Email Address: sara.broyles@xostrucks.com

Affiliation: Xos, Inc.

Subject: Public Comments from Xos, Inc. for Clean Transportation Incentives  
Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-fundingplan2022-B39UPQZ0Aw8GXwlg.pdf>

Original File Name: Xos, Inc. Comments to CARB FY 22-23 Funding Plan.pdf

Date and Time Comment Was Submitted: 2022-11-17 08:59:01

No Duplicates.

**Comment 3 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022). (At Hearing)**

First Name: Tom

Last Name: Van Heeke

Email Address: tvanheeke@rivian.com

Affiliation: Rivian Automotive, LLC

Subject: Corrected Comments on Proposed 2022-23 Funding Plan

Comment:

<p>Rivian Automotive, LLC, submits the attached comments on the proposed 2022-23 Funding Plan to correct minor errata in our prior submission dated November 16, 2022. The attached is intended to supersede the November 16 submission.&nbsp;<br /><br />Please contact me with any questions and thank you for your consideration. Rivian looks forward to the Board's discussion today.<br /><br />Tom Van Heeke<br />Senior Policy Advisor&nbsp;</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-fundingplan2022-USNRPIEmBD5RNgJs.pdf>

Original File Name: Rivian\_FundingPlanComments\_CORRECTED\_FINAL.pdf

Date and Time Comment Was Submitted: 2022-11-17 09:13:45

No Duplicates.

**Comment 4 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022). (At Hearing)**

First Name: Kristian

Last Name: Corby

Email Address: kristian@caletc.com

Affiliation:

Subject: Coalition Letter on HVIP and Large Fleet Eligibility

Comment:

<p>Please see the letter attached.</p>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-fundingplan2022-UzBQOVI+UW8FZgln.pdf>

Original File Name: Comment.pdf

Date and Time Comment Was Submitted: 2022-11-17 10:08:15

No Duplicates.

## **Comment 5 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022). (At Hearing)**

First Name: Jacob

Last Name: Toups

Email Address: Jacob.Toups@hacla.org

Affiliation: Housing Authority of the City of LA

Subject: Re: Proposed Fiscal Year 2022-23 Funding Plan for Clean Transportation Incentives  
Comment:

<span style="font-size: 12.0pt; color: black; background: white;">Clean Mobility Options</span><span style="font-size: 12.0pt; color: black;"> Grantee HACLA-09 is providing written public comment to urge the CARB Board to approve critical funding to support its grantees through rising costs for insurance and vehicles.  Since our notification of funding as part of the first cohort, HACLA and its partners UCLA and Green Commuter have been working in good faith to provide and maintain the appropriate insurance coverages, but it has proved very difficult for our mobility partner/operator Green Commuter to obtain Excess Auto coverage for the limits imposed by CARB.  There are very few carriers that will even write up a policy to meet the CMO grant requirements and the supportive cost to obtain this coverage is astronomical at over \$110,000 per year for this single policy.  It should be noted, this total is just to cover<strong>half</strong>the total cars we have listed in our original grant proposal -- which our team has to reconsider from both from insurance cost and rising cost of obtaining electric cars for the car share fleet.   </span></p>

<span style="font-size: 12.0pt; color: black;"> </span></p>

<span style="font-size: 12.0pt; color: black;">We believe EV infrastructure and education regarding usage of the cars is a critical component towards ensuring the most disadvantaged in our communities are not left behind and can be made ready to transition from gas powered transportation in time for the imposed deadline via recent CA legislation.   <span style="background: white;">Grantee HACLA-09 and its partners are dedicated to being creative and continuing to work to kick off of this grant for benefit of the disadvantaged households we aim to serve via our car share pilot.   </span></span></p>

<span style="font-size: 12.0pt; color: black;"> </span></p>

<span style="font-size: 12.0pt; color: black;">If CARB is not willing to offer this supportive funding, it MUST otherwise allow waivers for coverages required or proposals like ours may have no choice but to rescind our ability to continue as a grantee within this wonderful opportunity.  We hope this will not be a necessity and urge the Board to offer this funding to further support grantees with rising costs or otherwise allow waivers of

the required insurance coverages particularly for Excess Auto.</span></p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-11-17 12:46:00

No Duplicates.

**Comment 6 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022). (At Hearing)**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.



**Comment 7 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022). (At Hearing)**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 8 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022). (At Hearing)**

First Name: David

Last Name: Avina

Email Address: david@lincubator.org

Affiliation: LACI

Subject: CARB CMO Testimony - LACI [November 17, 2022]

Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-fundingplan2022-BmpUMwdIV20DWIV4.pdf>

Original File Name: LACI - CARB 11:18:22 Public Comment.pdf

Date and Time Comment Was Submitted: 2022-11-17 14:10:04

No Duplicates.

**Comment 9 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022). (At Hearing)**

First Name: Paul

Last Name: Crey

Email Address: pdcarey@msn.com

Affiliation:

Subject: ZEV verses optimizing energy conversion efficiency.

Comment:

<p>Thank you the opportunity to comment.</p>

<p>I would like the board to consider that mandating zero vehicle emissions, ZEV, represents a lost opportunity. If in 2003 the board mandated that all vehicles incorporate an electric drivetrain, that is, the only thing that turns the wheels is an electric motor, huge emissions reductions would have been achieved. This could have been acheived by 2015 if automobile manufacturers&rsquo; and consumers had been properly incentivized.</p>

<p>It has been demonstrated that hybrid electric vehicles (HEV) have twice the energy efficiency of internal combustion , ICE, vehicles. Stated otherwise, HEV uses half the gasoline to travel the same distance, twice the miles per gallon (MPG)</p>

<p>If we strive for the highest energy efficiency emissions will be reduced as well. ZEVs are ideal for a limit slice of the transportation sector. Our objective should be not ZE but the quest highest efficiency converting energy to motive force.</p>

<p>Respectfully submitted<br />Paul Carey<br />@pdcarey</p>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2022-11-17 14:29:15

No Duplicates.

**Comment 10 for FY 22-23 Funding Plan for Clean Transportation Incentives and Carl Moyer Program Changes (fundingplan2022). (At Hearing)**

First Name: Omar

Last Name: Gonzales

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Subject: Nikola's Comments on the 22-23 Funding Plan for Clean Transportation Incentives  
Comment:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-fundingplan2022-VDpRPIA6WWVSOAFg.pdf>

Original File Name: Nikola Public Testimony\_CARB Funding Plan\_20221117\_OG.pdf

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No Duplicates.