

**There are no comments posted to Open Comment for the June 22, 2023 Board Meeting (june2023opencomm) at this time.**

## **Comment 1 for Open Comment for the June 22, 2023 Board Meeting (june2023opencomm). (At Hearing)**

First Name: Mary  
Last Name: Davis  
Email Address: sdmary33@yahoo.com  
Affiliation:

Subject: EV & Lithium-ion Battery Fires - Data & Emissions Tracking  
Comment:

I am asking C.A.R.B. to start tracking the number of, and emissions from, lithium and car battery fires. Also, please create a public dashboard for that data as a matter of transparency.

With the push for Electric Vehicles and Active Transportation, we need to assess and count the risk -- not simply look at the benefits alone.

In New York City, four people were recently killed when a fire broke out in an e-bike shop. In my local region, the problem of battery fires has become so pronounced that the San Diego Reader ran an article in May titled, 'When Will San Diego's Lithium-ion Fires Stop?'

After a Tesla caught fire after a crash in Houston, it took 28,000 gallons of water to extinguish it. One Fire Chief even likened it to "a trick birthday candle."

Please implement a protocol to start tracking these fires, and the toxic emissions that contribute to diminished air quality in Southern California.

Respectfully,

Mary Davis  
Alpine, CA (San Diego)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-06-22 08:58:32

No Duplicates.

## **Comment 2 for Open Comment for the June 22, 2023 Board Meeting (june2023opencomm). (At Hearing)**

First Name: Yongbin (Barry)

Last Name: Zhen

Email Address: Barry@iquadrant.org

Affiliation:

Subject: Request for Clarification on Car-Sharing Businesses' Eligibility for the CVRP Rebate  
Comment:

To the California Air Resources Board (CARB),

I'm reaching out to seek your interpretation and review of the term 'Car-Sharing' as defined in the Clean Vehicle Rebate Project (CVRP) Implementation Manual and its Terms and Conditions. More specifically, we are seeking clarity on the eligibility of car-sharing businesses utilizing third-party platforms like Turo for the rebate program.

Our company operates a full-time electric vehicle (EV) car-sharing service on platforms such as Turo, providing vehicles for short-term rental to pre-approved individuals and businesses. Turo (The Platform) is providing the service by connecting individuals and business to these approved members who's interested in Car-Sharing.

Upon thorough review of the CVRP Implementation Manual and its Terms and Conditions, we have found the following relevant passages:

1. Page 18 of Implementation Manual states that "Traditional rental and car share fleets, as defined in Section V., are subject to limits of 20 rebates per calendar year."
2. Page 35 of Implementation Manual, Section V, defines 'Car Sharing' as "a model of vehicle rental where users can rent vehicles for short periods of time and users are members that have been pre-approved to drive."

It is our belief that our business model aligns with this definition, there by aligning with CARB and the CVRP's objective of promoting the use of clean vehicles. However, it appears there may be ambiguity regarding the eligibility of businesses such as ours that operate via third-party platforms, which has given rise to concerns regarding our application and denial of rebate, despite within the limits of 20 rebates for Car-Sharing business.

To that end, we kindly request CARB's clarification and interpretation on this matter. We would appreciate understanding why car-sharing businesses that operate via third-party platforms like Turo might be ineligible for the rebate, despite seemingly complying with the car-sharing definition given in the CVRP Implementation Manual.

Transparency on this issue would not only benefit our business but also other small businesses operating in the car-sharing space. We

consider ourselves part of the solution towards a cleaner and more sustainable California, and we seek to fully understand the rules and regulations that govern our participation in this important transition.

We sincerely appreciate your attention to this matter and eagerly anticipate your response.

Best regards,

Yongbin Zhen (Barry)  
Manager of i Quadrant LLC  
415-360-3030  
Barry@iquadrant.org

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-06-22 08:57:47

No Duplicates.

## **Comment 3 for Open Comment for the June 22, 2023 Board Meeting (june2023opencomm). (At Hearing)**

First Name: Chris  
Last Name: Gilbert  
Email Address: chris@gilbertbiz.com  
Affiliation:

Subject: re: Item 23-6-2 methane leakage and repair  
Comment:

Thank you for addressing the issue of methane leakage and repair.  
Please consider these points in forming your policy.

- There should be requirements or standards for notifying community members of the details and response plan when leaks are found near sensitive receptors like parks, schools, homes, hospitals, and other community areas.
- In addition to methane, CARB should include requirements for testing for co-pollutants like BTEX compounds and VOCs when leaks are found within 3,200 ft of communities, schools and other sensitive receptors.
- CARB should consider requirements for leak detection and repair (LDAR) inspections to be increased at sites within 3,200 ft of sensitive receptors such as communities & schools.
- The exemption of heavy crude oil (API gravity less than 20) from LDAR requirements should be removed.
- CARB should explore remote sensing methods other than by satellite to identify leaks, such as airplane flyovers, drones, or car-mounted detectors.
- The updated regulation should not exempt separator and tank systems that receive an average of less than 50 barrels of crude oil or and condensate per day.
- Records should be reported monthly with production figures or requested monthly by CARB to ensure testing is being performed.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2023-06-22 11:19:56

No Duplicates.