



May 23, 2016

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: FY 2016-17 Funding Plan for Low Carbon Transportation and Fuels Investments and the Air Quality Improvement Program (AQIP)

Dear Chair Nichols and Board Members,

We appreciate the opportunity to provide comments on the Fiscal Year 2016-2017 Low Carbon Transportation and Fuels Investments and the Air Quality Improvement Program (AQIP). Green Commuter strongly supports staff's proposed recommendations for the overall Low Carbon Transportation Funding Plan and specifically for Light-Duty Pilot Projects to Benefit Disadvantaged Communities. These programs are essential to accelerate widespread commercial deployment of zero emission vanpools, car sharing, and fleet replacement to substantially reduce greenhouse gas emissions, alleviate traffic and decrease the cost of commuting.

Green Commuter has developed an innovative system to utilize a fleet of 100% zero emission vehicles to provide a combined service of vanpool and fleet replacement to help decrease the cost of commuting, alleviate traffic, and reduce greenhouse gas emissions. To maximize vanpool efficiency, Green Commuter created a new model to use the vanpool vehicle to both transport passengers to and from employment centers and replace an employer's fleet during the middle of the day. The efficiency between the two systems dramatically increases the benefits and helps reduce costs. The Green Commuter system will help accelerate zero emission vanpool and fleet replacement to reduce air pollution, improve conditions in disadvantaged communities, improve connectivity, alleviate traffic congestion, and help carry out the Governor's ZEV Action Plan for 1.5 million vehicles on the road by 2025.

Our specific comments are outlined below:

1. Support for Funding Plan and Suggestion for Expansion of Existing Project Categories

Green Commuter supports staff's overall proposed Low Carbon Transportation Funding Plan for \$500 million for FY 2016-2017. If ARB receives additional funding for Low Carbon Transportation from California Climate Investments, we support allocating further funding for Light-Duty Pilot Projects to Benefit Disadvantaged Communities, as many of these programs have been significantly oversubscribed. Specifically, we support including a Zero emission Vanpool category within the Light-Duty Pilot Projects to Benefit Disadvantaged Communities, similar to the category for Agricultural Worker Vanpools in order to help deploy zero emission vanpool vehicles in disadvantaged communities throughout the state.



A zero emission vehicle vanpool
and car sharing company.

2. Support for Car Sharing and Mobility Options Program


Green Commuter strongly supports the Car Sharing and Mobility Options program and the \$8M proposed for the FY 2016-2017 Funding Plan. We suggest also including the \$300,000 from last year's award that is no longer moving forward into the FY 2016-2017 Car Sharing and Mobility Options program, as those funds were intended to help deploy projects within this category. This funding is essential to help deploy zero emission car sharing and vanpooling to disadvantaged communities in California.

3. Support for incentivizing EV leasing and EV rental arrangements

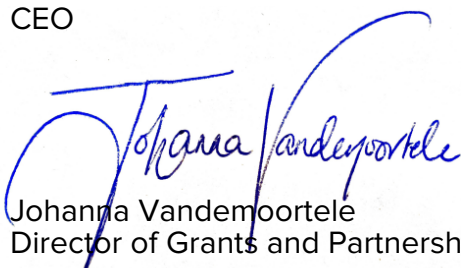
Currently, many of the State's EV investments and associated incentives typically have not been applied to EV leasing and EV rental arrangements. EV leasing and rental arrangements are an optimal model for fleet, car sharing, and vanpool applications. They offer an attractive option to government agencies, transit operators, and other fleet operators to efficiently deploy zero emission vehicles, without additional burdens of dealing with maintenance, insurance, etc. The convenience and economy of scale offered by the leasing and rental option, in turn, increases the scale and speed at which fleets are able to transform to zero emission technologies.

Thank you again for the opportunity to provide comments the Low Carbon Transportation and AQIP Funding Plan. We appreciate the leadership of the California Air Resources Board and the hard work to the entire AQIP team to reduce greenhouse gas emissions to benefit communities throughout California.

Kind Regards,



Gustavo Occhiuzzo
CEO



Johanna Vandemoortele
Director of Grants and Partnerships