

**There are no comments posted to November 2021 Open Comment  
(november2021opencomm) at this time.**

**Comment 1 for November 2021 Open Comment (november2021opencomm).  
(At Hearing)**

First Name: Paul  
Last Name: Dyson  
Email Address: [therailguy@yahoo.com](mailto:therailguy@yahoo.com)  
Affiliation:

Subject: Locomotive emissions and CARB policy  
Comment:

Chair and Board,  
Paul Dyson, past President, Rail Passenger Association of California, a volunteer group of advocates for modern passenger rail, and a resident of Burbank, CA  
Madam Chair and Board, global warming and all its consequences are here and acknowledged by the scientific community, and this organization cannot exempt itself from the broad consequences of its actions. Over the past few years CARB has funded the acquisition of new diesel locomotives for passenger train service in California, and at the same time required the destruction of existing, serviceable locomotives to qualify for funding. These older locomotives had many years of service life remaining but were indeed heavy polluters. Please understand two things. That the replacement of these large pieces of machinery, weighing over one hundred and forty tons, requires the mining of large quantities of iron ore, coal, bauxite and copper ore, not to mention oil to make plastics, to build these, plus all the added fuel from transportation and processing. The alternative, retrofitting with advanced filtration systems for example, seems to have been discounted, in spite of the fact that the carbon footprint of in situ recycling is a tiny fraction of new manufacture. This Board cannot live in a silo. Please don't tell me that this is not in your remit, and that you are only responsible for air quality. Global warming is everyone's problem. First, you should pledge to refuse funding for any more new diesel locomotives. There is no excuse whatsoever for building new when they will become obsolete in a few years. Second, to transition us to new electric powered trains, you should promote the recycling of existing locomotives, suitably upgraded with clean exhaust systems.

CARB should not any longer export our pollution, nor should you ignore the carbon footprint that results from your policies.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 09:32:01

No Duplicates.

**Comment 2 for November 2021 Open Comment (november2021opencomm).  
(At Hearing)**

First Name: Dave

Last Name: Cook

Email Address: dave.cook@railpropulsion.com

Affiliation: Rail Propulsion Systems

Subject: Locomotive Category Proposal for CORE funding in fy21-22 Clean Trans funding plan  
Comment:

The direct written comments link on this subject item 21-12-4 on fy21-22 Clean Transportation funding plan has been taken down, please move this over to the correct item if possible.

Attached to this comment, I've uploaded the written information regarding the CORE program proposal for locomotive categories

Below is a recap of my verbal public comment.

My name is David Cook and I work at a small California technology company that develops and demonstrates locomotive modernization retrofits, we currently have two zero emissions battery switcher locomotive projects ongoing in the Los Angeles area.

With the air boards leadership there has been a half century of progress in lower emissions from mobile sources in many applications ranging from cleaner automobiles in the 1970's up through zero emissions battery buses becoming the new normal today.

The state has spent hundreds of millions of dollars over the past few decades and at this time less than 10% of criteria emissions are coming from locomotives certified to Tier 4. The Tier 4 locomotive emissions standard is decades behind what is required of trucks.

The locomotives we are referring to in this comment are industrial and yard switching locomotives that spend all of their time sorting rail cars at railyards in urban disadvantaged areas impacted by high pollution

RPS has teamed up with a switching locomotive OEM and together we have proposed to ARB staff that that the CORE program under this funding plan should include a category for zero emissions locomotives for both industrial and yard switching applications. Locomotives are unique in that 50 year old locomotives are just as functional as brand new locomotives in railyard switching service and zero emissions pilot locomotives for this application can be put into pilot service with current technologies now

Leasing advanced locomotives in the CORE program should accelerate the pilot demonstration of lower emissions equipment in this application that is decades behind other mobile sources.

We further request that the CORE program keep the manufacturer

purchase option open for this new category.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-november2021opencomm-B2RdNFMgWG4LUgll.docx>

Original File Name: CORE Locomotive Notes (004).docx

Date and Time Comment Was Submitted: 2021-11-19 16:17:34

No Duplicates.

**Comment 3 for November 2021 Open Comment (november2021opencomm).  
(At Hearing)**

First Name: Elizabeth  
Last Name: Roble  
Email Address: elizabeth.roble@lightningemotors.com  
Affiliation:

Subject: Unredeemed HVIP Vouchers  
Comment:

To the Board,

My name is Elizabeth Roble and I am an attorney for Lightning eMotors, which is a mission driven company solely dedicated to the production and manufacture of electric vehicles with substantial presence in California, Colorado and other states. We have participated in the HVIP program for many years and we appreciate the HVIP program's prompt processing of our vouchers. The HVIP program allows us to make the cost of electric trucks affordable for fleets.

However, we currently have 24 vouchers that have not been redeemed despite the fact that we submitted all of the required paperwork. The vouchers were approved off of the waitlist on March 26, 2020.

The Electric Drivetrains were first delivered to our customer on November 19, 2020. Our customer has deployed the vehicles for a year now and many have been serving as airport shuttles in San Diego, CA. Yet, the vouchers are still pending review and we the manufacturer have not been paid for the zero emission drivetrains we provided for a year now. Because of this delay in payment, we were forced to terminate our relationship with our customer. The entire purpose of the HVIP program is to enable businesses like ours to further the deployment of zero emission vehicles, not to break the backs of small zero emissions manufacturers with delayed payment.

We have sent numerous emails to Patrick Chen and Peter Christensen at CARB, but we have not received a response for over a month. We have also called and emailed CALSTART and Tetra Tech, both of whom tell us to reach out to CARB.

Because of the lack of payment from CARB, we are unable to provide zero emission Electric Drivetrains to our customers, which defeats the purpose of the HVIP program. We kindly request the Board to request CARB to pay us as soon as possible.

Sincerely,

Elizabeth Roble  
elizabeth.roble@lightningemotors.com  
Lightning eMotors

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-11-19 16:35:02

No Duplicates.