Responses to Comments

on the

Draft Environmental Analysis Prepared for the

Zero-Emission Airport Shuttle Regulation and Zero-Emission Powertrain Certification Regulation

California Air Resources Board 1001 I Street Sacramento, California, 95814

Released June 24, 2019 to be considered at the June 27, 2019 Board Hearing This page intentionally left blank.

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1. INTRODUCTION

The California Air Resources Board (CARB or Board) released a Draft Environmental Analysis (Draft EA) for the Zero-Emission Airport Shuttle (ZEAS) Regulation and the Proposed Zero-Emission Powertrain Certification Regulation (collectively referred to as the Proposed Project) on January 4, 2019, for a 45-day public review and comment period that concluded February 19, 2019. CARB received numerous comment letters through the comment docket opened for the Proposed Project, including the Draft EA, during that time. All of the comment letters are available for viewing on the comment docket at: https://www.arb.ca.gov/lispub/comm/bclogs.php. Pursuant to CARB's certified regulatory program, staff reviewed all the comment letters received to determine which ones raised significant environmental issues related to the Draft EA requiring a written response.

This document presents those comments and CARB staff's written responses for the Board to consider for approval prior to taking final action on the Proposed Project. Although this document includes written responses only to those comments related to the Draft EA, all of the public comments were considered by staff and provided to the Board members for their consideration. For reference purposes, this document frequently includes direct quotes of each comment followed by the written response. The full comment letters have been bracketed and included in Attachment A to this document. Attachments and appendices to these comment letters can be found at the link to the docket provided above.

Following consideration of the comments received on the Draft EA and during the preparation of the responses to those comments, CARB revised the Draft EA to prepare the Final EA released June 24, 2019.

1.1. Requirements for Responses to Comments

These written responses to public comments on the Draft EA are prepared in accordance with CARB's certified regulatory program to comply with the California Environmental Quality Act (CEQA). CARB's certified regulations state:

California Code of Regulations, title 17, Section 60007. Response to Environmental Assessment

(a) If comments are received during the evaluation process which raise significant environmental issues associated with the proposed action, the staff shall summarize and respond to the comments either orally or in a supplemental written report. Prior to taking final action on any proposal for which significant environmental issues have been raised, the decision maker shall approve a written response to each such issue.

Public Resources Code (PRC) Section 21091 also provides direction on reviewing and responding to public comments in compliance with CEQA. While this section refers to environmental impact reports, proposed negative declarations, and mitigated negative

Zero-Emission Airport Shuttle and Zero-Emission Powertrain Certification Response to Comments

declarations, rather than an EA, it contains useful guidance for preparing a thorough and meaningful response to comments.

PRC Section 21091, subdivision (d) states:

(1) The lead agency shall consider comments it receives if those comments are received within the public review period.

(2) (A) With respect to the consideration of comments received, the lead agency shall evaluate any comments on environmental issues that are received from persons who have reviewed the draft and shall prepare a written response pursuant to subparagraph (B). The lead agency may also respond to comments that are received after the close of the public review period.

(B) The written response shall describe the disposition of each significant environmental issue that is raised by commenters. The responses shall be prepared consistent with section 15088 of Title 14 of the California Code of Regulations.

The CEQA Guidelines, in California Code of Regulations, title 14, Section 15088, also require a thorough and meaningful response to comments. Section 15088 states, in relevant part, that specific comments and suggestions about the environmental analysis that are at variance from the lead agency's position must be addressed in detail with reasons why specific comments and suggestions were not accepted. Responses must reflect a good-faith, reasoned analysis of the comments.

1.2. Comments Requiring Substantive Responses

CARB is required to prepare written responses only to those comments that raise "significant environmental issues" associated with the proposed action, as outlined in California Code of Regulations, title 17, Section 60007(a). A total of 28 comment letters were submitted electronically on or before February 19, 2019, to the comment docket set up for the Proposed Project and its appendices, including the Draft EA, and four additional comment letters were received late after the close of the docket and 5 comment letters were received during the Board Hearing on February 22, 2019. During the 15 Day Comment Period 13 comment letters were received. Out of the 46 total comments letters received, 4 comment letters were determined to include comments raising significant environmental issues related to the Draft EA. CARB staff took an approach of erring on the side of inclusion in determining which comments warranted a written response, and included some comments that did not mention the analysis included in the Draft EA but did raise issues related to potential adverse impacts related to the Proposed Project. CARB has responded to all comments that raise or relate to environmental concerns. Responses are not required at this time to comments that do not raise environmental concerns.

2. **RESPONSES TO COMMENTS**

The comment letters responded to in this document were assigned a sequential number in the order in which they were received. Table 2-1 provides the list of comment letters that contain environmental comments. Responses to these comments are provided below. Comment letters, bracketed to indicate individual comments, are provided in Attachment A.

Table 2-1: List of Comment Letters Receiving Responses for CEQA Purposes						
Comment Number	Date	Name	Affiliation			
7	February 15, 2019	Ryan Kenny	Clean Energy			
9	February 15, 2019	Thomas Becker				
10	February 15, 2019	Thomas Becker				
20	February 25, 2019	Anthony Dupree	Park N' Fly			

Comment Letter 7	Ryan Kenny
February 15, 2019	Clean Energy

7-1: The commenter Urges CARB to perform an alternatives analysis before adoption to allow the regulation to be scaled back if projections on cost, reliability, and technology aren't realized.

Response:

The commenter is not referring to a CEQA alternative to address any identified impacts; rather, it is requesting further exploration of policy alternatives. As required under the Administrative Procedure Act (APA) CARB analyzed two program alternatives in addition to the proposed regulations. In addition, staff will provide the Board with updates on the status of zero-emission technologies in the coming years.

Comment Letter 9	Thomas Becker
February 15, 2019	

9-1: The commenter states that CARB is required under CEQA to fully and truthfully respond to all of his comments.

Response:

Commenter misstates CEQA's requirements (although, of course, where responses to comments are required, they must be truthful). CEQA requires only responses to significant environmental issues raised pertaining to the proposed project, not to every question or concern raised by a commenter. Other comments not raising significant environmental issues will be responded to in the Final Statement of Reasons, in accordance with APA requirements.

9-2: The commenter asks about the number of people killed by fires started by faulty electrical transmission lines and equipment over the past 10 years. The commenter goes on to question how many gigawatt hours of electrical power consumed in the State of California were or will be transmitted through power lines that traverse national and state forests, parks and other forested/brush covered public lands in 2018 and in 2031. Furthermore, the commenter asks if increasing electrical power transmission through power lines and equipment that traverse forested and brush covered lands would increase or decrease the danger of fires started by electrical transmission power lines and equipment.

Response:

This comment does not appear to raise any environmental impact concerns with the Proposed Project, as the Proposed Project would not require or involve construction of any new transmission or distribution lines. Therefore, no response is necessary. However, staff provides the following response for transparency.

CEQA requires agencies to analyze and disclose a project's reasonably foreseeable direct and indirect environmental impacts.¹ An indirect impact should only be considered, however, if it is a reasonably foreseeable impact caused by the project.² Even where an indirect impact is reasonably foreseeable, such an impact can be evaluated at a more general level of detail.³ Furthermore, where impacts are claimed in connection with a product used by a proposed project, a "life cycle" analysis regarding production of that product is not required where the scale of the project is such that the increase in use of the product is uncertain or insignificant.⁴

¹ See 14 CCR §§ 15064(d)

² See 14 CCR §§ 15064(d)(3); 15358(a)(2).

³ See Save the Plastic Bag Coalition v. City of Manhattan Beach (2011) 52 Cal.4th 155.

⁴ See *id.* at 175.

Here, the Proposed Project would have minimal, if any, effect on statewide electric demand. No new electrical transmission or distribution infrastructure is anticipated to be needed to meet that minimal demand increase. The peak load measured by the California Independent System Operator from 1998 through 2016 has been between 41,000 to 51,000 MW. If all 1,000⁵ airport shuttles in California were to charge at the same time, on peak, at 50 kW per shuttle⁶,⁷, that would equal to an extremely conservatively estimated 50 MW of load from airport shuttles. That is less than one tenth of 1% of statewide peak load. If shuttle charging were to occur mostly off-peak (which is more likely), this load could provide a benefit to the grid, flattening out the overall load curve. Even if the proposed amendments did require more transmission or distribution infrastructure (which they do not), there is no clear correlation between additional infrastructure and risk of wildfire, given the many variables that go into calculating such a risk (including the locations of infrastructure, power generation, and loads, power flows, weather patterns, geography, transmission/distribution distance and voltage, infrastructure design, etc.). While such a wildfire risk analysis is not required here, even if it were, it would be speculative due to the statewide scale of the Proposed Project and these complex variables, many of which are decided not by CARB, but rather in state and local energy regulatory and entitlement proceedings.

Therefore, because the Proposed Project would only have the potential to insignificantly increase statewide electrical demand, and would not require any additional electrical transmission or distribution infrastructure, it would have no potential to significantly increase the risk of fires above the current baseline.

9-3: The commenter asks if model year 2019 class 4 and 5 gasoline powered shuttle buses are technically capable of running on 20% - 100% butanol.

Response:

This comment does not appear to raise any environmental impact concerns specific to the Proposed Project, and therefore no response is necessary. However in an effort to provide transparency staff is providing the following response.

⁵ Chapter I, Section D of the Staff Report: Initial Statement Of Reasons for the Proposed Zero-Emission Airport Shuttle Regulation, Available at:

https://www.arb.ca.gov/regact/2019/asb/isor.pdf?_ga=2.5192307.1378377436.1557860968-324172354.1540317891

⁶ 50 kW charging rate is assumed because that is the most common rate of charging needed to support the near 24-hour duty cycle of airport shuttles.

⁷ Section B.1. of Appendix C: Economic Analysis for the Proposed Zero-Emission Airport Shuttle Regulation, Available at:

https://www.arb.ca.gov/regact/2019/asb/appc.pdf?_ga=2.81550935.1378377436.1557860968-324172354.1540317891

Staff research and survey data⁸ yielded the following fuel types for Class 4 and Class 5 shuttles: compressed natural gas, gasoline, diesel, liquid propane gas, as well as battery-electric shuttles. Airport shuttle operators did not report any shuttles running on butanol and staff did not research butanol specifically as a potential alternative fuel. In developing this proposal, staff analyzed the effects of transitioning internal combustion powered shuttles to zero-emission technologies, as is required by the 2016 State Implementation Plan⁹. To the extent that the commenter is trying to set forth a potential alternative, analyzing such an alternative is not necessary since no significant adverse impacts were identified for the Proposed Project. The commenter's concerns about fire risk are highly speculative, and would not result from this project in any event because the Proposed Project would not significantly increase statewide electrical demand. See response to comment 9-2, above.

CARB, Aggregated Vehicle Inventory Data from Survey, Research, and Data Extrapolation. Released December 31, 2018.

9-4: The commenter asks whether increasing the number of plug-in battery powered vehicles in the state would increase the load on long distance electrical power transmission lines.

Response:

This comment does not appear to raise any environmental impact concerns with the Proposed Project, and therefore no response is necessary. See response to comment 9-2, above, which explains that the Proposed Project does not have the potential to significantly increase statewide electrical demand.

⁸ CARB, Aggregated Vehicle Inventory Data from Survey, Research, and Data Extrapolation. Released December 31, 2018.

⁹ Revised Proposed 2016 State Strategies for the State Implementation Plan available at https://www.arb.ca.gov/planning/sip/2016sip/rev2016statesip.pdf

Comment Letter 10	Thomas Becker
February 15, 2019	

10-1: The commenter again claims CARB is required under CEQA to fully and truthfully respond to all of his comments.

Response:

Please see response to comment 9-1.

10-2: The commenter asks how many birds were killed in the past 10 years and how many birds will be killed between 2030 and 2045 in California by electrical generation wind turbines. The commenter further asks how many birds of protected species were killed in the past 10 years and how many birds of protected species will be killed between 2030 and 2045 in California by electrical generation wind turbines.

Response:

This comment does not appear to raise any environmental impact concerns with the Proposed Project, and therefore no response is necessary. However in an effort to provide transparency staff is providing the following response.

As discussed in response to comment 9-2, above, the Proposed Project does not have the potential to significantly increase statewide electric demand, and no new electrical transmission or distribution infrastructure would be needed. Bird deaths have been documented at a variety of power generation facilities, including wind and solar facilities. However, no new power generation resources would be needed to implement the Proposed Project. Since there is no foreseeable casual link between the Proposed Project and additional bird deaths, the risks identified by the commenter are speculative, and are not reasonably foreseeable. CEQA does not require analysis of impacts which are not reasonably foreseeable.

Comment Letter 20	Anthony Dupree
February 25, 2019	Park N' Fly

20-1: The commenter asks if staff has researched the total emissions required to produce Li-ion batteries used in shuttle buses or the power plant emissions required to charge these vehicles.

Response:

As explained above, CEQA does not require full "life cycle" analyses of the impacts from manufacturing products that would be used in connection with a proposed CEQA project. (See response to comment 9-2, above.) Emissions from manufacture of Li-ion batteries, in this case, would be speculative given that Li-ion is a global commodity and can be sourced from across the globe. The Proposed Project would only minimally increase demand for Li-ion batteries compared to overall global lithium demand, and would not have the potential to substantially affect existing manufacturing chains for this product.¹⁰ Furthermore, CEQA does not require a detailed "life cycle" analysis regarding the effects associated with manufacturing products the use of which would be indirectly increased by a proposed project.¹¹

Staff's emissions analysis¹² looked at GHG from well-to-wheel and took power generation into account. By 2035 the shuttle fleet will be fully electric, but GHGs will be reduced by 90%, not 100% - the 10% difference accounts for power generation. By 2050, GHGs are expected to be reduced by 100% as the electric grid is transferred to renewable technologies.

Emissions of criteria pollutants from vehicles have a more direct health impact than criteria pollutant emissions from power plants due to their geographic locations and greater overall proximity to people. Staff's emission analysis¹³ evaluated criteria pollutants (NOx and PM 2.5) on a downstream, or tank-to-wheel, basis. The transition of airport shuttles to zero-emission technologies is expected to decrease the tank-to-wheel emissions of criteria pollutants. Internal-combustion fuels and electricity both have upstream emissions associated with their production and transport. Staff expects any increase in upstream, or well-to-wheel emissions from electricity generation is expected to be mitigated by the decrease in upstream emissions due the elimination of internal combustion fuels. Emissions of criteria pollutants from vehicles have much

¹¹ See Save the Plastic Bag Coalition v. City of Manhattan Beach (2011) 52 Cal.4th 155, 175.

¹⁰ Final Environmental Analysis For the Proposed Zero-Emission Airport Shuttle Regulation and Zero-Emission Powertrain Certification Regulation, Pages 71-72, Available at: https://ww2.arb.ca.gov/index.php/rulemaking/2019/asb19

¹² Chapter IV, Section B of the Staff Report: Initial Statement Of Reasons for the Proposed Zero-Emission Airport Shuttle Regulation, Available at:

https://www.arb.ca.gov/regact/2019/asb/isor.pdf?_ga=2.5192307.1378377436.1557860968-324172354.1540317891

¹³ Summary of Emissions Inventory Analysis

more direct health impacts than emissions from power plants due to their geographic locations and proximity to people.

ATTACHMENT A

COMMENT LETTERS

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4675 MacArthur Court, Suite 800 Newport Beach, California 92660 (949) 437-1000

www.cleanenergyfuels.com

Ryan Kenny Senior Public Policy and Regulatory Affairs Advisor – Western U.S.



The Honorable Mary Nichols Chair, California Air Resources Board Post Office Box 2815 Sacramento, CA 95812 February 15, 2019

RE: Zero-Emission Airport Shuttle Regulation

Dear Chair Nichols:

On behalf of Clean Energy, please accept for consideration the following comments concerning the proposed *Zero-Emission Airport Shuttle Regulation*.

We understand ARB's rationale to transition to a zero-emission future, but the proposed regulation is overly optimistic and underestimates the potential public health, societal and economic costs resulting from not supporting technologies that are ready and feasible now as part of the overall strategy. We remain concerned that this is yet another policy that will prove problematic and require the Board to revisit substantial revisions in the future.

Therefore we urge the Board to direct staff to perform an alternatives analysis before adoption to include off-ramps should specific benchmarks not be met. The Board should at a minimum provide authority to scale back the regulation if staff's projections on cost, operational reliability, and technology readiness fall short.

We remain concerned serious problems, outlined below, need to be addressed before this policy is adopted. Federal attainment requirements in 2023 and 2031 are in serious jeopardy of being met and the transportation sector must continue to be a priority as a remedy. This includes supporting zero emission vehicle development via a long-term strategy, but <u>also</u> via a short-term strategy the focus on technologies that are available for deployment <u>today</u>. Most notably, this includes heavy duty natural gas vehicles (NGVs) using renewable natural gas transportation fuel.

The low NOx engine has been certified at the optional .02 emission standard, providing greater than 90% reduction in NOx emissions. Based on research by UC Riverside CE-CERT, The 8.9L and 11.9L natural gas engines emitted lower NOx emissions than its EPA certification standard, as low as a 99% reduction at .002g NOx. Additionally, emissions decreased as the duty cycles decreased (i.e., slower speeds, idling, stop-and-go traffic) unlike diesel that increased 5-9 times above the 2010 certification. Furthermore, when you pair this technology with the biofuel, renewable natural gas, you also achieve substantial GHG emissions as well.

Please consider these critical points:

 <u>Aggressive timeframe</u>: our company works with many fleet owners who would be forced to comply with this regulation, and from their feedback it is clear they do not feel the implementation deadlines are feasible. One major off-airport parking company has expressed doubt they can acquire enough electric vehicle charging and supply at their airports, and have spatial concerns. They expressed:

- One in five buses that were delivered had major problems with battery pack, software, transmission and drive train that has resulted in significant down time and continual trouble shooting;
- Difficulty in obtaining permission from the local government to put in charging stations. Of those installed, half have been broken and are out of warranty yet were not even two years old. Each service call costs at least \$1,000.

In addition, a major airport has expressed concern about the timeline for implementation. While the regulation would be onerous, low NOx vehicles using renewable natural gas are almost at zero emission – 99% cleaner than diesel – while the carbon intensity is much less, down to negative 303.

 <u>Cost</u>: the substantial burden of expense will be incurred by fleet owners, as an electric airport shuttle bus is almost double the cost of a low NOx shuttle bus: \$150,000 vs. \$80,000. This is in addition to high costs of infrastructure, regular maintenance, electricity and staff training.

Clean Energy shares ARB's goals to further reduce emissions throughout the state's airport shuttle properties. We diverge, however, in the approach on technology and believe this hybrid approach is warranted. Low NOx shuttle buses emit nearly the same emissions as what would be required under this regulation, albeit with a lower carbon intensity and half the cost. At a minimum incorporating effective off-ramps, should specific benchmarks not be reached, is prudent, sound and equitable policy.

Sincerely,

Ryan Kenny Senior Public Policy & Regulatory Affairs Advisor – Western U.S. Clean Energy

Public comment, Zero Emission Airport Shuttle Regulation, Due by 2/19/19

The government of the State of California is proposing a "zero emission" standard throughout the state, including transportation, electrical generation and other energy production/usage. The goal is "zero emission" by 2030.

Currently, the government of the State of California has actively opposed the revision of EPA/FHWA fuel economy standards. The state has threatened to sue.

The government of the State of California has also threatened to oppose new leases in the OCS proposed in the BOEM 5 year leasing plan. A lawsuit from the state has also been threatened.

It is questionable that the State's "zero emission" plan is workable. Currently, less than 1% of motor vehicles registered in the state are powered solely by batteries. It's doubtful that internal combustion engine powered vehicles will account for less than 95% of the fleet by 2030. The state has shown a prejudice against the internal combustion engine, and has promoted battery powered vehicles to the detriment of other propulsion systems.

The state government is required under CEQA to fully and truthfully answer relevant questions in environmental documents. In the past, the state has refused to do so. The state has no credibility when it refuses to fully and truthfully answer questions, preventing the resolutions of issues, then threatens to sue or actually files a suit.

Questions for the California Air Resource Board:

1) How many people have been killed by fires started by faulty electrical transmission lines/equipment in California during the past 10 years?

2) How many gigawatt hours of electrical power consumed in the State of California were transmitted through power lines that transverse national and state forests, parks and other forested/brush covered public lands in 2018? Please provide supporting documents.

3) how many gigawatt hours of electrical power consumed in 2031 will be transmitted through power lines that transverse national and state forests, parks and other forested/brush covered public lands? Please provide supporting documents.

9-2 Contid

4) Will increasing electrical power transmission through power lines/equipment that transverse forested/brush covers public lands increase or decrease the danger of fires started by electrical transmission power lines/equipment? Please explain you answer and provide all supporting documents.

5) What is the current average distance between electrical generation points and point of consumption in terms of Gigawatt hours miles travelled (same concept as Vehicle Miles Traveled)? Please provide supporting documents.

6) What will be the average distance between electrical generation points and point of consumption in 2031? Again, in terms of Gigawatt hours miles travelled? Please provide supporting documents.

7) What is the current purchase costs of class 4 and 5 gasoline powered shuttle buses?

8) What is the current purchase costs of class 4 and 5 battery powered shuttle buses?

9) Are model year 2019 class 4 and 5 gasoline powered shuttle buses technically capable of running on 20%- 100% butanol?

10) Can butanol be manufactured as a 100% renewable fuel? Is it being manufactured now?

11) What would be the fuel cost per mile for battery powered class 4 and 5 shuttle buses at a kilowatt hour cost of 30 cents?

12) What would be the fuel cost per mile of class 4 and 5 shuttle buses powered by 100% renewable butanol at a fuel cost of \$1.50 per gallon?

13) Is there any reason to believe that model year 2030 class 4 and 5 gasoline powered shuttle buses will not be capable of operating on 100% renewable butanol?

14) In 2031, will battery powered shuttle buses be technically capable of being charged from fossil fuel powered generators?

15) In 2031, how will battery powered shuttle bus operators be physically prevented from charging their shuttles using fossil fuel powered generators?

16) In 2031, will battery powered shuttle bus operators be allowed to charge their buses using fossil fueled generators if there is a widespread power outage?

17) How many motor vehicles powered exclusively by batteries were registered (both new and existing) in California in 2018?

18) How many motor vehicles powered exclusively by batteries will be registered (both new and existing) in California in 2031?

19) How many new motor vehicles powered exclusively by batteries were sold in California in January, 2019?

20) Will increasing the number of plug-in battery powered vehicles in the state increase the load on long distance electrical power transmission lines?

Tom Becker

Buellton, CA

lesdeplorable7@gmail.com





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BELOW IS THE COMMENT YOU SELECTED TO DISPLAY. COMMENT 10 FOR ZERO-EMISSION AIRPORT SHUTTLE REGULATION (ASB19) - 45 DAY.

First Name: Thomas Last Name: Becker Email Address: lesdeplorable7@gmail.com Affiliation. Subject: Zero Emission Airport Shuttle Rule, public comment due by 2/19/19 Comment: Some additional questions, to be added to my original 2/15/19 comments/questions. Please answer fully and truthfully, as required 10 -1 by CEQA: 1A) How many Gigawatt hours of electricity consumed in California in 2030 will be generated by the following sources: Wind power Solar power Natural gas Large hydro Geothermal 2A) How many Gigawatt hours of electricity consumed in California in 2045 will be generated by the following sources: Wind power Solar power Natural gas large hydro geothermal 3A) Has CARB reviewed the Green New Deal resolution currently scheduled for a vote before the U.S. Senate? 4A) Does CARB consider the Green New Deal's goal for electrical generation source emission reduction feasible? 5A) Has any CARB employee or board member contacted or been contacted by any member or staff personnal of the U.S. Senate, U.S. House of Representatives, California State Senate, California State

Assembly or California Governor's office (including the Governor) to discuss the Green New Deal?

6A) has any CARB employee or board member offered any opinion or advice on the Green New Deal to any person/group as outlined in question 5A? Please provide a detailed list of all contacts and description of opinions/advice provided.

7A) How many birds were killed in the past 10 years in California by electrical generation wind turbines? Please provide sources.

8A) How many birds will be killed in California by electrical generation wind turbines between 2030 and 2045? Please provide sources.

9A) how many birds that are part of protected species were killed by electrical generation wind turbines in the last 10 years in California? Please provide sources.

10A) How many birds that are part of protected species will be killed by electrical generation wind turbines in California between 2030 and 2045?

Tom Becker Buellton, CA lesdeplorable7@gmail.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2019-02-17 11:21:46

If you have any questions or comments please contact Clerk of the Board at (916) 322-5594.

Board Comments Home

CONTACT US

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Dupree, Anthony
Poggi, Anthony@ARB
Mehzun, Noah
RE: California Airport Shuttle questions
Monday, February 25, 2019 7:14:29 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good evening Anthony,

My colleague and I were in Sacramento last week and attended the conference on 2/21/19. First I want to commend you and the state of California for taking the steps to reduce GHG's and be a leader in innovation. Park N' Fly would love to be at the forefront of this innovation. I was wondering if you had a minute to answer some questions we had about the Airport Shuttle bus Electric vehicle proposal?

- I was wondering why when we spoke and I offered information about our vehicle use this was something that you were researching related to this proposition? We only found out about this proposal a few weeks before it happened and did not know we would be able to submit comments until a few days prior to the meeting. So we were not able to prepare remarks. This would not have changed our answers but it would've allowed us to prepare and research more.
- 2. How do we get on notification list to get this information as early as it is possibly available?
- 3. One of my major concerns when CARB is factoring the RTI, the cost you are associating with the cost of a class 4 vehicle is grossly under what I have been quoted. I was quoted at the cheapest end \$210,000 and at the higher end \$300,000 for a class 4 electric vehicle vs CARBs \$150,000 value.
- 4. The infrastructure costs are greatly under estimated as well. We recently brought in a 450v system at one of our lots to power a shop. Just the transformer and distribution box cost us nearly \$40,000. This did not include any trenching or installation of charging stations. I suspect the infrastructure cost alone to install 5 to 6 charges will be closer to \$60,000 or \$70,000. Can these numbers be corrected in your analysis? Also has any consideration been made for the fact if this proposal passes the cost of these stations and materials to install them will increase as demand grows?
- 5. What testing has been done and documented on a scale for the battery life? One of my major concerns is when you are continually recharging these batteries they create heat and wear the internal components out quicker. With the level 3 chargers at 50kw, this will charge the batteries in about 4 hours but how many times can you realistically do this before damaging the cells in the battery?
- 6. There are several grants to incentivize converting fleets to electric, however, most are for removing gas or diesel powered engine in exchange for an electric vehicle. We operate almost 60 vehicles in California. None fit this build to qualify for these grants. We are losing \$100,000 per vehicle in incentives because we already took steps to operate clean vehicles and convert our entire fleet to CNG. What incentives will be offered to companies like ours that have already made an investment into clean energy?

- 7. Has any conversations been made with the manufacturers (GM, Ford, Chrysler) about producing specialty chassis for electrification models? I ask because right now you have to purchase a chassis with an engine and transmission that are removed and replaced with the motor and generator for the electric vehicle. This would easily reduce the cost of chassis by 10 to 15 thousand dollars. Rather than forcing us to purchase them to have them removed and can only be sold as used in the aftermarket.
- 8. I heard a lot of talk about tailpipe emissions, but has your team researched the total emissions required to produce the Li-ion batteries these vehicles require or the power plant emissions required to charge these vehicles? While we completely support a green initiative and agree something must be done to reduce green house gases, if the process to produce and charge these vehicles produces more pollutants than you will save is this really the best step to take at this point in time?
- 9. I do not think allowing the voluntary sign up for certification is a good idea. This will allow manufacturers a way to skirt the issues if they release a inferior product. If we are going to have to purchase these vehicles as an end user, We would like some kind of assurance that we are getting a high quality product.

I know this is a lot but if you are able to respond or would like to set up a call to discuss these items I would greatly appreciate it. We would like to work with California on getting the best proposal out there. Noah and myself are available to discuss these issues with anyone on your team or if someone from the board would like to speak with us we would be honored. We regret not making a comment at the meeting and hope to have our voice heard in this.

Kind Regards

Anthony Dupree Fleet/Operations Manager Office: 404-364-8121 Cell: 817-903-8273 adupree@pnf.com New 50th Logo (002)

From: Poggi, Anthony@ARB <Anthony.Poggi@arb.ca.gov>
Sent: Monday, October 15, 2018 1:35 PM

20-1

To: Dupree, Anthony <ADupree@PNF.com> Subject: RE: California Airport Shuttle questions

Anthony, Are you available today for a quick phone call?

Thank you, Anthony

From: Poggi, Anthony@ARB
Sent: Monday, October 08, 2018 7:37 AM
To: 'Dupree, Anthony' <<u>ADupree@PNF.com</u>>
Subject: RE: California Airport Shuttle questions

Thanks so much for contacting me. What time today is convenient for a quick conversation?

From: Dupree, Anthony <<u>ADupree@PNF.com</u>>
Sent: Monday, October 08, 2018 5:26 AM
To: Poggi, Anthony@ARB <<u>Anthony.Poggi@arb.ca.gov</u>>
Subject: RE: California Airport Shuttle questions

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Morning Anthony

I am Anthony Dupree, the New Fleet Manager for Park N Fly. I took over for Dustin earlier this year after he was promoted. I would be more than happy to take your call and answer your questions to the best of my abilities.

Thank you and have a great day!

Anthony Dupree Fleet/Operations Manager Office: 404-364-8121 adupree@pnf.com

New 50th Logo (002)

From: Hoeppner, Dustin
Sent: Monday, October 8, 2018 8:23 AM
To: Dupree, Anthony <<u>ADupree@PNF.com</u>>
Subject: FW: California Airport Shuttle guestions

FYI

From: Poggi, Anthony@ARB <<u>Anthony.Poggi@arb.ca.gov</u>>
Sent: Friday, October 5, 2018 3:32 PM
To: Hoeppner, Dustin <<u>DHoeppner@PNF.com</u>>
Subject: California Airport Shuttle questions

Dustin,

My name is Anthony Poggi and I am working on the Airport Shuttle Bus Regulation for the California Air Resources Board. Last year you filled out our survey for all of Park n Fly's shuttles operating at California Airports. Thanks so much for taking the time to provide that information. I am currently trying to gather a bit more data regarding the number of passengers transported per day and per trip to/from the airport. If you have a few minutes for a quick phone call I would really appreciate it.

Thanks,

Anthony Poggi

Air Pollution Specialist Incentives and Technology Advancement Branch Mobile Source Control Division **California Air Resources Board** 1001 | St., 5th Floor, Sacramento, CA 95814 Phone: (916) 324-9424