

There are no comments posted to Open Comment for the December 9, 2021, Board Meeting (dec2021opencomm) at this time.

**Comment 1 for Open Comment for the December 9, 2021, Board Meeting
(dec2021opencomm). (At Hearing)**

First Name: David

Last Name: Tenney

Email Address: dt@mantecatrailer.com

Affiliation: California RV Dealers Association Presid

Subject: SORE

Comment:

CARB Board Members,

I respectfully request that you not only examine the loss of revenue and jobs.

The State of California RV Dealers sold over one billion dollars of RVs with Generators in 2021 alone.

The customers will go out of state to make this purchase. It is easily done and no person will do without because of this regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-09 12:34:21

No Duplicates.

Comment 2 for Open Comment for the December 9, 2021, Board Meeting (dec2021opencomm). (At Hearing)

First Name: Patrick J.

Last Name: McDuff

Email Address: pat@californiafueling.com

Affiliation:

Subject: CARB's Low Emissions Diesel Study

Comment:

In October 2018 CARB began a Low Emission Diesel effort in response to its State Implementation Plan commitments with the intent to increase the use of Low Emission Diesel fuels in California, resulting in reduced NOx and PM emissions relative to the use of conventional diesel.

Staff recently issued the results of their Low Emission Diesel Study engine test program. All indications are that Staff have significantly overestimated the NOx emissions benefits of renewable diesel. The Low Emission Diesel Study found that renewable diesel, at best, provides only NOx equivalent emissions versus CARB Diesel in New Technology Diesel Engines which is in stark contrast to Staff's claims that renewable diesel reduces NOx by 5-10%.

The 2022 SIP plan must account for Staff's errored promotion of RD as a NOx offset factor based on the Low Emission Diesel Study.

As CARB knows, there is significant investments being made in RD projects which are underpinned by the LCFS. Investors don't react well to uncertainty and CARB's LED Study data raises major concerns associated with the use of renewable diesel.

The LED Study findings not only impacts the future of renewable diesel, but it also impacts the modified Alternate Diesel Fuel regulation.

Unfortunately, the Board's intervention is required given Staff's rush to judgement in the implementation of the modified Alternate Diesel Fuel regulation which the Board will recall in April of 2021 was a highly contested regulation wherein stakeholders objected to Staff's proposed pathway. Unbeknownst to stakeholders and the Board, Staff were in possession of the LED Study data prior to April 2021 which did not support implementing the modified ADF yet withheld it. As a result, Staff require direct Board oversight of both the modified ADF and LED Study in order to ensure Staff make the necessary corrections to the modified ADF and advise stakeholders of the potential regulatory actions they may take in response to the LED Study. The Board should immediately direct Staff to update it regarding this matter.

Thank you for the opportunity to publicly comment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-09 12:36:01

No Duplicates.

**Comment 3 for Open Comment for the December 9, 2021, Board Meeting
(dec2021opencomm). (At Hearing)**

First Name: Gabriel

Last Name: Borden

Email Address: Gdb39@nau.edu

Affiliation:

Subject: Electrifying Small Ferry Businesses

Comment:

First, offer no-interest loans to California small businesses undertaking zero-emission projects when a Moyer grant is awarded. Many of the sportfishing operators and short-run ferries are small, family-run, women or minority businesses that cannot possibly find financing for these big projects.

Second, increase funding for zero-emission maritime projects specifically for onshore charging infrastructure. By making zero-emission electric/hydrogen repowers easier than going diesel, California will gain enormously because electric/hydrogen solutions reduce climate change emissions.

Third, technology is changing rapidly. For those adopting green technology, California should create a fund for adopting new battery technology, new emissions controls and new green hydrogen storage so early adopters are not penalized for going first and continue to innovate as new technology becomes available.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2021-12-09 14:04:29

No Duplicates.