



BLUEGREEN  
ALLIANCE



Ms. Liane Randolph  
California Air Resources Board  
1001 I St  
Sacramento CA 95814

Dear Chair Randolph,

The following groups, Transport Workers Union, Union of Concerned Scientists, Center for Energy Efficiency and Renewable Technologies, Coalition for Clean Air, Sierra Club California, Natural Resources Defense Council and NextGen California are pleased to provide comments to the California Air Resources Board (CARB) related to the Regulatory Order for the Clean Miles Standard (CMS), a critically important policy for reducing climate emissions from Transportation Network Companies (TNCs) and other high mileage fleets.

**We support the proposed standards for greenhouse gas emissions and electric vehicle miles traveled (eVMT) and urge the board to adopt the proposed rule.** We applaud the work of staff to strengthen the draft rule over the past year and appreciate your attention and responsiveness to our comments and concerns. We are strongly supportive of efforts to reduce emissions from ridehailing, as research has found that the average ridehailing trip currently produces 69% more greenhouse gas emissions than the trip it displaces. If implemented carefully, this proposed rule has the potential to provide significant benefits in greenhouse gas emission reductions, air quality improvements, increased availability of EV charging infrastructure, and savings for ridehailing drivers. In particular, we are supportive of the following aspects of the proposed regulatory order:

- The eVMT target of 90% in 2030 is a significant improvement over the draft target evaluated in the SRIA, and an ambitious but achievable standard for the ridehailing industry.
- The greenhouse gas emissions target of 0 grams CO<sub>2</sub>/PMT in 2030 ensures that ridehailing companies will further reduce their emissions, while providing incentives to reduce congestion impacts of ridehailing by reducing deadheading and increasing pooling.
- Strong data reporting requirements that will ensure compliance with this standard and inform potential future regulatory processes.

We do have some concern that the eVMT and GHG targets in the early years of the regulatory period ramp up too gradually. When combined with the ability for companies to

bank credits for overcompliance with the GHG targets, there is a risk that companies may not make as significant progress toward the GHG goals -- through steps like further electrifying, reducing deadheading, increasing first/last mile connections, and increasing pooling-- during the later years as the GHG and eVMT targets begin to diverge. Ride hailing companies should be electrifying ahead of the fleet as a whole due to their increased emissions and potential for larger savings from transitioning to EVs. CARB should be matching the ambition of the interim targets to the overall goal and clear policy direction CA has taken toward increasing the uptake of electric vehicles.

**The Clean Miles Standard regulatory design should take every opportunity to push TNCs to demonstrate that they are supporting driver transition to EVs.** There are important considerations around costs to drivers to switch to EVs, and we appreciate CARB's focus on equity considerations throughout the rulemaking process. Companies are employing a range of strategies to support drivers in transitioning to electric vehicles, both in response to emission standards and to make progress toward their own commitments to reduce their carbon emissions. Compliance with the GHG target should address the up-front incremental costs of EV purchase as well as charging infrastructure barriers, such as the additional costs associated with DCFC utilization for drivers who are unable to charge at home. It is particularly important that drivers have transparent and consistent information about what support is available, and a commitment from the companies to continue providing promised support.

Based on the data released by CARB from its cost analysis developed as part of the ISOR, UCS has estimated that covering the up-front costs of transitioning to electric vehicles, while ensuring drivers to reap the savings from lower fuel and maintenance costs, would cost companies less than 4 cents per mile, less than 40 cents on the average ridehailing trip.

**Data collection and analysis is critical to meet the state's ambitious climate goals. We commend CARB on robust data collection that is necessary to measure and track TNC emissions and to evaluate and minimize the burden on low-and moderate income drivers on the transition to zero-emissions vehicles.** Even if CARB is not statutorily empowered to ensure minimal negative impact on drivers through the Board's regulatory procedure, CARB must collect the proper data to enable CPUC to fulfill this statutory obligation.

Suggestions to ensure CARB collects appropriate data:

- In Attachment 1 Required Trip Data Fields, in the field on "App On Or Passenger Dropped Off Latitude & Longitude" TNCs can submit either App On *or* Passenger Dropped off location. We recommend collecting both sets of data "App On and Passenger Dropped off Location" to enable CARB to track the length of the trip the driver makes back to their base location. For example, a driver may start in San Francisco and drop off a passenger in Oakland, which is app on. After dropping off the passenger, the driver then goes back to San Francisco, perhaps spending an hour in traffic. That is time on the road that needs to be tracked in data collection.
- On the field of "Passenger Pick-up." We recommend dividing this field into two data points—1) driver arrival at the passenger location and 2) passenger pick-up and start of P3 trip. Both data points are necessary to measure the amount of time a driver

spends idling or circling while waiting for a passenger to arrive and engage P3 time. Idling or “deadhead” time is a major source of unnecessary TNC emissions and must be tracked.

We also recommend that CARB make this data public and hold annual hearings so that stakeholders and the public can comment on TNC’s progress toward the CMS goals and any problems with transparency or accountability to meeting those goals. CARB and the CPUC should require companies to demonstrate that they are supporting drivers, and evaluate that support in the context of trends in total driver compensation. Reporting of this data should be required of all ridehailing companies and we look forward to continuing to engage on this important issue with both CARB and the California Public Utilities Commission (CPUC).

**Optional credits for micromobility and transit connections are a good start at addressing other impacts of ridehailing, but would benefit from further clarification.**

We support CARB staff proposal to focus bike/pedestrian credits on contributions toward infrastructure rather than the number of micromobility trips provided.

While micromobility services, like other emerging transportation technologies, offer the potential for emissions reductions if micromobility trips displace SOV trips, these emission benefits are not yet well-documented. By providing GHG credits for contributions toward infrastructure projects included in local jurisdiction plans, CARB is ensuring that these credits result in long-term emission reductions that benefit users of the micromobility services provided by the companies as well as users who walk or use their own bicycles, scooters, and wheelchairs. We encourage CARB to consider particularly encouraging investments in identified projects in low income and environmental justice communities.

We appreciate CARB staff’s efforts to advance this rulemaking process during very uncertain times in the world and in the ridehailing industry. We hope that these comments are useful as CARB continues through the regulatory process. We look forward to continued conversations as the process moves forward.

Sincerely,

Bill Magavern  
Policy Director  
Coalition for Clean Air

Daniel Barad  
Policy Advocate  
Sierra Club California

David Weiskopf  
Senior Policy Advisor  
NextGen California

Erin Rodriguez  
CA Policy Advocate  
Union of Concerned Scientists

John Shears  
Consultant on Air Quality, Climate & Clean Transportation  
The Center for Energy Efficiency and Renewable

Matt Hettich  
Chairperson of the CA State Conference  
Transport Workers Union

Sam Appel  
California Policy Manager  
Blue Green Alliance

Simon Mui, Ph.D.  
Deputy Director  
Clean Vehicles & Fuels Group