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October 14th, 2019

to: Clerk of the Board, California Air Resources Board

email: cotb@arb.ca.gov

Lyft, Inc.'s Comments on Proposed CVRP Program Changes

Dear California Air Resources Board:

For environmental and operational reasons, Lyft, Inc. (Lyft) is actively working to increase the number of electric vehicles (EVs) on its platform. Currently, Lyft's rental car partners (eg Avis Budget Group) can only access a maximum 20 rebates under the CVRP Rental Car Provision. Each of these credits can reduce cost for rideshare drivers to rent EVs, and each electric Lyft vehicle generates **3-5x more electric miles than an individually purchased EV** and will allow **adoption of clean vehicles by underserved Californians** who cannot or do not currently purchase electric vehicles. The Rental Car Provision is a wonderful concept, but it is obvious that 20 vehicles will not move the needle on adoption or emissions reduction which are the goals of the program. Therefore, **we respectfully request an increase in the number of credits available under the CVRP Rental Car Provision.**

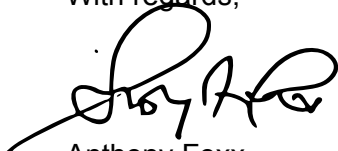
We note Senate Bill 1014 and Health and Safety Code 44274.4 direct CARB to work with Transportation Network Companies (TNCs) and rental entities that provide vehicles to drivers participating in TNC platforms to "evaluate the role" of such entities in the context of the CVRP. We believe that after evaluation, it is clear that allocating a small amount of additional budget to this effort will significantly increase electric vehicle adoption in CA, reduce emissions, and allow an underrepresented demographic to access clean vehicles.

Specifically, we request that CARB consider updating CVRP implementation rules to allocate a fair and reasonable amount of CVRP budget to the TNC use case by increasing the Rental cap. As TNCs account for ~3% of Vehicle Miles Traveled (VMT) in California counties [according to Fehr and Peers](#), we propose that 3% of the CVRP overall budget be allocated for the Rental Car Provision - this translates to around 2500 vehicles up from 20, though even raising the cap to 500 vehicles (<1% of the budget) would be a great step. For 3%, the State would reap benefits equivalent to 12% of the budget and **the funding will flow to drivers in the form of lower EV rental rates, not to any TNC.** We are happy to work collaboratively with CARB to further develop this proposal and provide data to support the proposal as needed. By allocating a few

percent of the budget to help drivers access EVs, Lyft believes that the State would reap the following benefits:

- **Replace gasoline miles with clean miles faster than any other use case**
Public funding to help electrify rideshare vehicles is a very efficient use of tax dollars to reduce emissions because utilization of our fleet is so high-- 3-5x miles of a typical personal vehicle. Electrifying TNCs is a **more efficient use of State transportation emission reduction funding in terms of dollar spent per gCO2 saved** compared to personal vehicles.
- **Support regional charging networks**
High mileage fleets provide a significant utilization boost to regional charging networks, accelerating Charging Operators' return on investment, allowing for the possibility of charging fees to decrease for all users. Lyft's EV deployments thus far **have increased utilization of regional charging networks by 2 - 4 times**, which charging operators strongly need to keep fees down.
- **Help all communities access clean vehicles**
Around 60% of Lyft drivers in CA identify as a minority. Incentivizing electric vehicles for drivers is a very effective way to get **clean vehicles and clean jobs to underserved populations** that typically do not or cannot access EVs.
- **Expose millions of Californians to electric vehicles**
Many Lyft drivers in CA come from disadvantaged communities while the median income of an EV buyer in CA is over \$170,000. Incentivizing EV rentals for drivers will help low-income portions of the population access zero emissions vehicles - **any incentive would flow to our drivers, not Lyft, in the form of lower rental costs**. In addition, each rideshare ride exposes a new passenger to electric vehicles, perhaps for the first time.

With regards,



Anthony Foxx
Chief Policy Officer, Lyft