



Oct 5, 2024

California Air Resources Board (CARB)

1001 I Street,
Sacramento, CA 95814

RE: Moyer2024 - Proposed Revisions to the Carl Moyer Memorial Air Quality Standards Attainment Program Guidelines

Dear CARB Staff,

RIDE appreciates the opportunity to comment on the Proposed Revisions to the Carl Moyer Memorial Air Quality Standards Attainment Program Guidelines. For over two decades, the Carl Moyer Program has been a key incentive for reducing transportation emissions and promoting zero-emission medium- and heavy-duty vehicles (MHD ZEVs). As a leader in battery-electric MHD vehicle technology, RIDE, headquartered in California, is eager to collaborate with CARB to help achieve California's zero-emission vehicle goals.

RIDE – A Lead MHD Vehicle Electrification Partner in California

RIDE, representing Real Innovation Delivered with Excellence is the U.S. spinoff of BYD focused on the commercial passenger market. Our Lancaster manufacturing facility, operational since 2013, is a 550,000-square-foot hub that produces 1,500 MHD ZEVs annually, with hundreds of union employees who are members of the Sheet Metal, Air, Rail and Transportation Union, Local 105. We are well-positioned to help meet the state's growing demand for ZEVs in the transit and school bus markets.

RIDE offers the following support with suggestions for the Board's consideration when implementing the proposed changes to the Carl Moyer Program. We believe the continued success of the program will help expedite an equitable transition to zero-emission school buses for California's youth.

Support Lowering Baseline School Buses' Gross Vehicle Weight Rating (GVWR) Requirements

RIDE supports CARB staff's proposal to lower the Moyer Eligible GVWR for baseline school buses from over 14,000 lbs. to over 9,000 lbs. School districts around the state typically deploy diverse fleets of school buses (Class 2b - Class 8). The type of bus deployed is often based on specific size requirements, needs, and local terrain. Legacy Type A-1 school buses, that burn diesel or gasoline and weigh between 8,500 lbs. and 10,000 lbs., are especially popular because of their maneuverability. Under the existing 2017 Carl Moyer Program, these buses must go through a case-by-case review process in order to qualify. However, as a primary source of ZEV school bus funding in California, and potentially the only available option due to budget constraints for FY24-25, the Carl Moyer Program should incentivize school districts to electrify their entire fleets, regardless of vehicle weight. Lowering the GVWR ensures rural and underserved communities that typically use smaller buses can access funding for cleaner models. Additionally, we recommend that CARB maintain a more granular survey of usage statistics for various bus types to inform future program changes.

Support Increasing the Baseline Model Year Eligibility for School Buses

RIDE supports CARB staff's proposal to allow school buses with engines of any model year to be eligible for Carl Moyer Program funding. The change recognizes the evolving needs of school districts in their transition to ZEV. As we enter the fifth year of state funding for ZEV school buses, many districts have already replaced their oldest fleets and are now eager to retire their well-worn diesel vehicles, many of which have been in service for up to 15 years. By removing the baseline model year limitation, CARB is



ensuring that districts can continue to modernize their entire fleets, accelerating the shift to cleaner, zero-emission alternatives. This flexibility is essential for meeting the state's 100% ZEV goals and ensuring healthier, cleaner air for all students.

Support the Expansion of Eligible Costs

RIDE supports the proposed expansion of eligible costs to include taxes, warranty, insurance, and transportation fees, and we encourage CARB to clearly list them as eligible costs in Chapter 4 of the guidelines. Many school districts have delayed the transition to ZEV school buses because existing funding programs did not cover these essential costs. State sales taxes alone can add \$40,000 or more to the cost of a single bus, making the ZEV transition cost-prohibitive, especially for disadvantaged or rural districts with limited budgets. By including these additional expenses in the eligible cost categories, CARB is alleviating the financial burden and making the transition to cleaner transportation more feasible for school districts across the state.

Support the Creation of a Co-Funding Allowance Webpage and Maximizing Stacking with Other Funding Sources

RIDE supports CARB staff's initiative to create a dedicated webpage for co-funding allowances and other funding opportunities. Currently, Carl Moyer program applicants have to rely on AQMD officers to confirm if the fund can be combined with other incentive programs, which often require further clarification from CARB. A centralized platform on the CARB website would streamline this process, making it easier for AQMD, school districts, small fleets, and other applicants to access accurate, up-to-date information on co-funding options, thereby expediting the application process.

Meanwhile, RIDE emphasizes the importance of maximizing the ability to combine Carl Moyer funds with other state school bus funding. The current per-vehicle funding levels often fall short of covering the total vehicle cost, especially after taxes and other soft costs. Enhancing the ability to combine with other funding sources will provide critical financial support to districts working to electrify their fleets.

We want to reiterate our recognition of the hard work CARB staff have put into making the Carl Moyer Program more flexible and accessible, and express our sincere appreciation for the opportunity to voice this support and our suggestions.

Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,

Angel Yin

Policy Analyst

888 East Walnut St. Pasadena, CA, 91104

Angel.yin@ride.co

(626) 770-4678