



January 15, 2020

RE: ASSESSMENT OF CARB'S ZERO-EMISSION VEHICLE PROGRAMS PER SENATE BILL 498

Dear Members of the California Air Resources Board:

As you well know, existing law generally designates the State Air Resources Board as the state agency with the primary responsibility for the control of vehicular air pollution. The Charge Ahead California Initiative, administered by the state board, includes goals of, among other things, placing in service at least 1,000,000 zero-emission and near-zero-emission vehicles by January 1, 2023, and increasing access for disadvantaged, low-income, and moderate-income communities and consumers to zero-emission and near-zero-emission vehicles. Our company Greenkraft, wholeheartedly supports this effort and has great hopes that it will be expanded in the near future in ways that we may be able to fully participate.

Our company (Greenkraft) is a small volume manufacturer established in 2008 has technology to provide near zero emission engines and vehicles that are produced today. Greenkraft's production facility is located in Santa Ana, Orange County, California is capable of producing these engines and vehicles that can be used in all types of applications and can assist in meeting the SB 498 goals of placing at least 1,000,000 zero emissions vehicles in the state of California. Greenkraft engines can be used in many types of medium and heavy duty trucks and these vehicles can be used in most commercial fleets from classes 4 to 7. The majority of our trucks are used in California are in classes 4,5, and 6.

Greenkraft produces these vehicles to be powered by Natural Gas, Propane, and even Gasoline. The technology Greenkraft uses is a patented fuel system that uses viable natural resources that are abundantly available in the United States and California and with a technology that is available now.

Here is a list of vehicles and engines Greenkraft offers in alternative fuel CNG and LPG and also even Gasoline with near zero emissions.

Engines

6.0 liter CNG LPG Gasoline

8.0 liter CNG LPG Gasoline

12.0 liter potential engine CNG LPG Gasoline

15.0 liter potential engine CNG LPG Gasoline

Trucks Classes 4 to 7

14,000 – 16,000 lbs class 4

16,001 – 19,000 lbs class 5

19,001 – 26,000 lbs class 6

26,001 – 33,000 lbs class 7

CNG LPG Gasoline and Electric



We hope you will keep in mind, these important factors that will impact Greenkraft' s ability to produce these products. We ask the board to consider and have awareness of the following:

1. Providing manufacturing incentives or funds to expand production could help small volume manufacturers like us to expand/operate.
2. Continuing to raise awareness of the benefits of alternative fuels which would help remind consumers/fleet managers that there are viable now that have consequential attributes in the areas of ease of fueling, range and emissions reductions.
3. Incentives for fleets to purchase alternative fuel near zero engines or trucks in environmental justice communities.
4. New programs or revised programs need to be implemented. Current programs like Carl Moyer, VIP, and many others require an old diesel to be surrendered which fleets are willing to do. However, there is a flaw in these programs where non-compliant vehicles that do not have diesel particulate filters do not qualify to be surrendered, only compliant vehicles. As a result, many fleets cannot trade their old vehicles in for new near zero emission vehicles. Also these programs take more than a year to get funds after applying---which is too long.
5. The HVIP program has many requirements in order for products to be listed and qualify for incentives, these need to be streamlined and be made more inclusive.
6. Development of some leniency or waiver requirements for CARB certification for small volume manufacturers and alternative fuel manufactures to get certification. This will greatly aid some companies like ours.
7. Incentives to introduce new engine displacements need to be considered and expanded.

We look forward to working with you and the staff to implement this important program and legislation. Please let us know if we can assist your important efforts in any manner.

Sincerely,


George Gemeyal
CEO

Cc: Richard Corey, Executive Officer
Steve Cliff, Deputy Executive Officer
John Dunlap, Dunlap Group