

Form Letter 1 for Comment 334 for Innovative Clean Transit 2018 (ict2018) - 45 Day.

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Subject: No on ICT
Comment:

In its current form, the Innovative Clean Transit rule, divests in critical public goods and services by mandating a technology that is not viable for its intended use:

-Electric buses cost nearly 3.5 times that of a CNG bus with ranges that far exceed that of their electric counterpart. Some systems in rural California received as little as \$34,000 from FTA and limited financial support from State and local governments: this mandate has the potential to limit and/or stop services in less affluent areas.

-The rule provides limited-term incentive funding but no dedicated funding to offset the cost of a much more expensive technology.

-Current mandates by the federal government specifically bar purchases of Chinese-manufactured buses (i.e. - electric buses.)

-The acceptability of ZEB as an alternative to less clean vehicles has been postured by lobbyists from electric bus manufacturers: actual data provided from ZEB-implemented agencies in Oregon and BAY-area, CA show that actual range is generally 1/3-2/3 of estimates posited by ZEB-manufacturers and highly dependent on terrains. These vehicles simply do not travel on one charge to complete an average route.

-This regulation would require rural agencies to cut life line services (such as Plumas Transit's service to the nearest major medical center) as the distance traveled could not be provided by ANY known electric vehicle as of today

-This regulation highly favors affluent urban areas and their public transit systems with no acknowledgement of funding differences/FO and DAR miles traveled in rural areas.

-The added weight of battery packs could limit the amount of passengers allowed on a vehicle and MORE IMPORTANTLY: the amount of ADA wheelchair-passengers on a vehicle.

-This regulation does not address caveats presented that could potentially cause agencies to fall out of compliance with both federal and state law and the Americans with Disabilities Act.

-The impact of this regulation on a public good that seeks to limit road congestion and single-occupancy vehicle reliance could lead to services cut - having the opposite, intended consequence.

For all these reasons, I request the Board and esteemed staff take into consideration both the nuances of the proposed regulation and of a spurious technology - both the mandated technology and the regulation in its current form are incredibly harmful to public transit, HOV infrastructure, and the head way California has just started to make on coordinating transit and mobility services in the state. I respectfully ask you to consider a reinvestment in mass transportation rather than a divestiture; our state needs less

reliance on SOV's and more mobility options.

Attachment:

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