



August 30, 2018

Mary Nichols, Chair
California Air Resources Board
1001 I Street, P.O. Box 2815
Sacramento, CA 95812-2815

Re: Support for a Strong Innovative Clean Transit Rule

Submitted online via CARB’s Web Comment Submittal Form

Dear Chair Nichols:

We, the undersigned members of the Advanced Clean Transit (ACT) Coalition Partners, appreciate the opportunity to provide comments on the Innovative Clean Transit (ICT) Proposed Rule. We view the adoption of a strong ICT Rule as a key component of California’s overall drive to zero emission transportation technologies to protect public health while achieving our clean air and climate standards and creating good-paying jobs in the state. We appreciate the work of the board and staff to move this proposal forward.

We offer our support for approval of this rule at the upcoming CARB Board meeting on September 27th and 28th. However, in order to more fully achieve the states objectives for reducing criteria pollutants and green-house gases, we urge you to make the following three improvements to the rule.

1. **Achievement of 100% Zero Emissions Bus (Bus) 2040 Goal** – In the Proposed Regulation Summary, the first listed “Key element of the proposal...” is that “Transit agencies develop individual plans to transition to a zero-emission bus fleet by 2040.” We fully support this goal and it means that by 2040, all transit agency buses will be zero emission. And yet the rule does not explicitly codify the 2040 requirement. Twenty- two

years from now provides more than ample time for agencies to plan their fleet turnover to meet this goal.

We recommend that the rule contain specific language that requires that all buses must be zero emissions by 2040 and thereafter.

2. **Cutaway, Over-The-Road, Double Decker, and Articulated Buses** - The proposed rule states that cutaway, over-the-road (motor coaches), double decker and articulated buses are excluded from the ZEB purchase requirements until January 1, 2026. These four classes of buses make up almost one-third of all buses. There currently is at least one bus in each of these four bus types that is CARB HVIP eligible.

We agree that these bus types may be excluded from this rule initially but recommend that transit agencies be required to purchase buses according to the rule requirements for other transit buses two years after at least two commercial buses have been Altoona tested and become HVIP eligible in a bus class.

3. **Transit Agency Plan Creation For Small Agencies** – The proposed rule calls for large agencies to complete their ZEB rollout plans by July 1, 2020 and July 1, 2023 for small agencies. For the small agencies, this is an unnecessary and deleterious three-year delay. Planning is the first step for an agency in transitioning to ZEBs and its delay will delay deployment for small agencies and ultimately impair their ability to transition their fleets by 2040. Further, they may miss the opportunity to take full advantage of the many currently available financial incentive and support programs. By giving the small agencies another six months, they can learn from the large agency plans and will have a total of two years for planning. Preparing a plan for a smaller agency should be far less complex than for a large agency, making this eminently doable.

We recommend that small agencies should complete their plans by January 1, 2021.

Adoption of the three improvements we recommend will help California realize the benefits of this rule sooner while maintaining the cautious and prudent nature of the proposal. In addition, the rule should create more ambitious near-term targets to meet for the waiver of requirements for the first two years. Pushing transit agencies to deploy more buses now will only amplify the benefits of this regulation.

The single best incentive California can pursue to push electric buses is a clear direction that the state is moving to zero emissions buses. This will send a strong market signal, and as transit agencies continue their transition at an accelerating rate, bus costs will continue to come down, range and utility will continue to increase, and transit agencies will experience the cost-effective operation inherent in ZEBs. California will once again demonstrate to other states how new emission-reduction programs can help clean up our air and atmosphere while also enhancing our economies.

Sincerely,

Sierra Club

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