

# **Comment 1 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: sigmund

Last Name: gronich

Email Address: sigmundgronich@aol.com

Affiliation: charisma consulting

Subject: Integration of port facilities with hydrogen and electric vehicles

Comment:

I was impressed by SCE's plan to electrify and provide electric power to cranes and other assorted heavy duty equipment at the Long Beach port facility. However, such an approach is absent as to what hydrogen vehicles can bring to the table. Toyota has a project to build large hydrogen fuel cell trucks at the port and provide hydrogen fuel and electricity to the port. I worked at the DOE for 31 years and lastly in the hydrogen program. There we considered City Gate Plants that co-produced electricity, hydrogen fuel for vehicles and grid storage, and water. The development of 2500 F and sub- sequentially 3100 F hydrogen turbines by 2022 will significantly reduce electric generation costs to permit carbon sequestration or utilization of biomass feedstocks. GTI is currently developing a Compact Hydrogen Generator that is far smaller than an SMR and less costly. The current California grid model with solar and wind as the renewable resources leaves a system requiring too much battery storage which is far more costly than hydrogen storage (\$150/kWh vs \$25/kWh and much less required).

SCE NEEDS TO BETTER EVALUATE THE BENEFITS OF A HYDROGEN ECONOMY FOR THE GRID AND TRANSPORTATION and a more encompassing port facility project list.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-03-27 12:22:09

No Duplicates.

## **Comment 2 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Ray

Last Name: Pingle

Email Address: Ray\_Pingle@msn.com

Affiliation: Sierra Club California

Subject: Comments on ICT Regulation Concept

Comment:

Please see our attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/4-cleantransit-ws-UzIBZFwpAAwGYwZp.pdf](http://www.arb.ca.gov/lists/com-attach/4-cleantransit-ws-UzIBZFwpAAwGYwZp.pdf)

Original File Name: ACT Coalition Partners Comments on 3-27-18 ICT Doc 4-12-18 .pdf

Date and Time Comment Was Submitted: 2018-04-12 15:24:45

No Duplicates.

**Comment 3 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Alex

Last Name: Dell

Email Address: alex@maasenergy.com

Affiliation: Maas Energy Works

Subject: Proposed ICT Regulation

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/5-cleantransit-ws-VzpcO1AwUHBWDwht.docx](http://www.arb.ca.gov/lists/com-attach/5-cleantransit-ws-VzpcO1AwUHBWDwht.docx)

Original File Name: Maas Energy Works.docx

Date and Time Comment Was Submitted: 2018-04-13 11:16:49

No Duplicates.

**Comment 4 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Tom  
Last Name: Webb  
Email Address: thomas.webb@baesystems.com  
Affiliation:

Subject: Comments to the Innovative Clean Transit Regulation Discussion Document  
Comment:

Please review attached comments BAE Systems is submitting in response to Innovative Clean Transit regulation proposal.

Attachment: [www.arb.ca.gov/lists/com-attach/6-cleantransit-ws-AWNQNwNnUFwDdlMq.pdf](http://www.arb.ca.gov/lists/com-attach/6-cleantransit-ws-AWNQNwNnUFwDdlMq.pdf)

Original File Name: BAE Systems comments on ICT Document 4.18.2018.pdf

Date and Time Comment Was Submitted: 2018-04-19 09:37:13

No Duplicates.

**Comment 5 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Sam

Last Name: Lehr

Email Address: slehr@montaukenergy.com

Affiliation: Montauk Energy

Subject: ICT Opposition Letter

Comment:

Please see the attached document from Montauk Energy pertaining to the proposed ICT regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/7-cleantransit-ws-WzJUMQB1WVULYgl5.pdf](http://www.arb.ca.gov/lists/com-attach/7-cleantransit-ws-WzJUMQB1WVULYgl5.pdf)

Original File Name: ICT Opposition Letter\_Montauk Energy\_4-20-18.pdf

Date and Time Comment Was Submitted: 2018-04-20 14:13:54

No Duplicates.

**Comment 6 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Hannah  
Last Name: Goldsmith  
Email Address: hannah@caletc.com  
Affiliation: CalETC

Subject: CalETC Comments Re Update on ICT Discussion Document  
Comment:

Thank you for your consideration of our comments.

Attachment: [www.arb.ca.gov/lists/com-attach/8-cleantransit-ws-UjFUM1U4BTMHdQFi.pdf](http://www.arb.ca.gov/lists/com-attach/8-cleantransit-ws-UjFUM1U4BTMHdQFi.pdf)

Original File Name: CalETC Comments Re Update on ICT Discussion Document Final.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:09:36

No Duplicates.

**Comment 7 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Steven

Last Name: Wallauch

Email Address: stw@platinumadvisors.com

Affiliation:

Subject: AC Transit ICT Comments

Comment:

Please see attached comments from AC Transit

Attachment: [www.arb.ca.gov/lists/com-attach/9-cleantransit-ws-WzpQNQRaBSJVIQBh.pdf](http://www.arb.ca.gov/lists/com-attach/9-cleantransit-ws-WzpQNQRaBSJVIQBh.pdf)

Original File Name: AC Transit Innovative Clean Transit Comments.pdf

Date and Time Comment Was Submitted: 2018-04-30 15:18:50

No Duplicates.

**Comment 8 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Michael

Last Name: Pimentel

Email Address: michael@caltransit.org

Affiliation: California Transit Association

Subject: California Transit Association's Response to Update on ICT Discussion Document  
Comment:

Response letter uploaded as PDF.

Attachment: [www.arb.ca.gov/lists/com-attach/10-cleantransit-ws-AGNQIlc3AAxVIQNm.pdf](http://www.arb.ca.gov/lists/com-attach/10-cleantransit-ws-AGNQIlc3AAxVIQNm.pdf)

Original File Name: CTA Response Letter - ICT Update - 4-30-18.pdf

Date and Time Comment Was Submitted: 2018-04-30 15:27:13

No Duplicates.



**Comment 9 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

**Comment 10 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Karen  
Last Name: King  
Email Address: kking@getbus.org  
Affiliation: Golden Empire Transit District

Subject: Innovative Clean Transit Regulation  
Comment:

See Attached

Attachment: [www.arb.ca.gov/lists/com-attach/12-cleantransit-ws-VTYBZgd0U2JXDgQx.docx](http://www.arb.ca.gov/lists/com-attach/12-cleantransit-ws-VTYBZgd0U2JXDgQx.docx)

Original File Name: CARB 5.3.18.docx

Date and Time Comment Was Submitted: 2018-05-10 09:42:03

No Duplicates.

**Comment 11 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Kristin  
Last Name: Essner  
Email Address: kessner@octa.net  
Affiliation: OCTA

Subject: Update on Innovative Clean Transit Discussion Document  
Comment:

Please see attached document for OCTA's comments on the updated discussion document.

Attachment: [www.arb.ca.gov/lists/com-attach/13-cleantransit-ws-VTgGYVAoBwtSZlVl.pdf](http://www.arb.ca.gov/lists/com-attach/13-cleantransit-ws-VTgGYVAoBwtSZlVl.pdf)

Original File Name: May 2018 OCTA Comment Letter re Update on Innovative Clean Transit Discussion Document.pdf

Date and Time Comment Was Submitted: 2018-05-15 09:07:23

No Duplicates.

**Comment 12 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Alex  
Last Name: Clifford  
Email Address: AClifford@scmtd.com  
Affiliation:

Subject: Comments  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/19-cleantransit-ws-VWcANgMzUDsLUgNp.zip](http://www.arb.ca.gov/lists/com-attach/19-cleantransit-ws-VWcANgMzUDsLUgNp.zip)

Original File Name: 2018\_JAN 19\_ICT\_Letter to CARB.zip

Date and Time Comment Was Submitted: 2018-05-17 13:07:38

No Duplicates.

## **Comment 13 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Ladson  
Last Name: Geddings  
Email Address: ladson@sbcglobal.net  
Affiliation:

Subject: ICT  
Comment:

Save more of our children from health problems caused by burning fossil fuels in their school buses. Replace all fossil fuel buses ASAP with clean electric power. Instead of the 2040 date; move it up to 2025 for those districts that can meet the advanced date.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-05-23 14:38:40

No Duplicates.

**Comment 14 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Vincent  
Last Name: Wiraatmadja  
Email Address: vincent@weidemangroup.com  
Affiliation:

Subject: BYD Comments - May 2018  
Comment:

BYD's May 2018 comments.

Attachment: [www.arb.ca.gov/lists/com-attach/23-cleantransit-ws-AGkAZVAIU15XPFU0.pdf](http://www.arb.ca.gov/lists/com-attach/23-cleantransit-ws-AGkAZVAIU15XPFU0.pdf)

Original File Name: ICT May 2018 BYD Comments.pdf

Date and Time Comment Was Submitted: 2018-05-25 16:05:21

No Duplicates.

**Comment 15 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Jim  
Last Name: Hartnett  
Email Address: epsteinj@samtrans.com  
Affiliation: San Mateo County Transit District

Subject: Innovative Clean Transit regulation  
Comment:

Letter attached as a PDF.

Attachment: [www.arb.ca.gov/lists/com-attach/24-cleantransit-ws-VDcBZlckUmMDWgRo.pdf](http://www.arb.ca.gov/lists/com-attach/24-cleantransit-ws-VDcBZlckUmMDWgRo.pdf)

Original File Name: CARB Letter May - SamTrans.pdf

Date and Time Comment Was Submitted: 2018-05-29 13:14:50

No Duplicates.

## **Comment 16 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Mona  
Last Name: Babauta  
Email Address: MBabauta@goldengate.org  
Affiliation: Golden Gate Transit

Subject: Comments on Innovative Clean Transit Regulation  
Comment:

Please see attached letter from the Golden Gate Bridge, Highway and Transportation District's General Manager, Denis Mulligan, regarding the proposed Innovative Clean Transit (ICT) Regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/25-cleantransit-ws-ATNTZQMzVD9XfAIy.pdf](http://www.arb.ca.gov/lists/com-attach/25-cleantransit-ws-ATNTZQMzVD9XfAIy.pdf)

Original File Name: 2018-0529-GGBHTD-ICTComment Letter.pdf

Date and Time Comment Was Submitted: 2018-05-29 18:54:27

No Duplicates.



**Comment 17 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Brett  
Last Name: Garrett  
Email Address: brett@dolphyn.com  
Affiliation:

Subject: Personal Rapid Transit is Innovative Clean Transit  
Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/26-cleantransit-ws-UCMFbAZrUWMBdVR6.docx](http://www.arb.ca.gov/lists/com-attach/26-cleantransit-ws-UCMFbAZrUWMBdVR6.docx)

Original File Name: Solar.docx

Date and Time Comment Was Submitted: 2018-06-04 12:32:22

No Duplicates.

## **Comment 18 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Hunter

Last Name: Harvath

Email Address: hharvath@mst.org

Affiliation: Monterey-Salinas Transit

Subject: Innovative Clean Transit Regulation Concept

Comment:

Monterey-Salinas Transit (MST) concurs with the points made in a letter from the California Transit Association dated April 30, 2018 regarding the proposed Clean Transit rules as they would affect public transit agencies.

MST is the public transit operator for Monterey County and has regional connections into Santa Cruz County, Santa Clara County, and San Luis Obispo County. MST's 60 bus routes cover a nearly 300 square mile service area of coastal California. In fact, MST's service area covers fully 1/5 of the coast of California, and has one of the longest public transit routes in the nation - the equivalent distance of Washington, DC to Philadelphia.

It is because of this large service area that MST has serious concerns about the proposed rules that would require a percentage of any bus order to include electric buses. As of this date, the majority of MST's routes are too long to utilize electric buses given the current range of the battery powered vehicles.

Despite that, MST has moved forward with testing and evaluating various electric vehicle technologies. In fact, MST had the first in-ground wireless enroute charging system (WAVE) in North America.

We retrofitted an old diesel themed trolley bus with an electric propulsion drivetrain. The wireless charging system has performed very well, although at the time of installation, only 50 KWh charging was available. Now the industry standard is 250 KWh. As such, we are awaiting delivery of 2 BYD plug-in electric buses, and are about to submit a grant application to the federal government for two Gillig electric buses. In addition, MST conducted an electric bus implementation study to help us assess which of our bus lines would be conducive to electric buses, and which weren't given the range of today's vehicles. And, MST has spent hundreds of thousands of dollars to upgrade our two bus garages to have enough power to charge 19 electric buses. MST took the initiative on its own regarding electric buses without being forced by CARB regulations. As a smaller transit agency, it is important for us to carefully evaluate the performance of the various electric bus manufacturers and charging systems before we make any major electric bus purchases.

Another barrier to electrification is PG&E and its understaffed engineering department here in Salinas and the inordinate amount of months it takes to get on PG&E's construction schedule. It has been nearly impossible to have any electrical design or implementation work done by PG&E. In addition, where MST is going to be building a third bus garage, PG&E does not have sufficient power to accommodate all proposed projects in the Business Park where we will be constructing that facility. And, PG&E still does not have any favorable rates for electric bus charging. And, it is my understanding that they are about to shift their "peak period" rates later into the afternoon/evening, which is precisely the time our mechanics would be doing repairs and charging the electric

buses.

A final concern that should be raised relates to the role of public transit operators in natural and/or man-made disasters. We are called upon for evacuations and emergency transportation during such events. It is common in natural disasters for the power to go out. In fact, the power lines themselves can start wildfires during windy conditions. If we are eventually 100% electric and the power goes out, how are we going to recharge our buses as they are needed to make multiple trips sometimes to remote areas of the county to rescue evacuees.

Thank you for the opportunity to comment on this important matter. We hope that you will consider a less aggressive implementation schedule for smaller agencies in air basins with good air quality, such as the Monterey Bay Area.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-06-08 13:12:10

No Duplicates.

**Comment 19 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Doran  
Last Name: Barnes  
Email Address: dbarnes@foothilltransit.org  
Affiliation: Executive Director, Foothill Transit

Subject: Comments for ICT  
Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/28-cleantransit-ws-VzEFbANtBSIGaANq.pdf](http://www.arb.ca.gov/lists/com-attach/28-cleantransit-ws-VzEFbANtBSIGaANq.pdf)

Original File Name: Foothill Transit Comments on ICT Reg.pdf

Date and Time Comment Was Submitted: 2018-06-11 13:58:39

No Duplicates.

**Comment 20 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Alex

Last Name: Clifford

Email Address: aclifford@scmtd.com

Affiliation: Santa Cruz Metropolitan Transit District

Subject: Comments in follow-up to the June 13, 2018 CARB Workshop

Comment:

Please see attached letter

Attachment: [www.arb.ca.gov/lists/com-attach/29-cleantransit-ws-VmQHMRkUDtSCwVv.pdf](http://www.arb.ca.gov/lists/com-attach/29-cleantransit-ws-VmQHMRkUDtSCwVv.pdf)

Original File Name: 2018\_June 21\_CARB\_Letter to Jack Kitowski.pdf

Date and Time Comment Was Submitted: 2018-06-22 17:18:15

No Duplicates.

**Comment 21 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Stephen

Last Name: Trichka

Email Address: stephen.trichka@baesystems.com

Affiliation: BAE Systems

Subject: BAE Systems comments on ICT Draft Proposed Regulation Summary

Comment:

Please review attached comments BAE Systems submits in response to the Innovative Clean Transit Draft Proposed Regulation Summary.

Attachment: [www.arb.ca.gov/lists/com-attach/30-cleantransit-ws-UzFQN1czAw8Cd1Ir.pdf](http://www.arb.ca.gov/lists/com-attach/30-cleantransit-ws-UzFQN1czAw8Cd1Ir.pdf)

Original File Name: BAE Systems comments on ICT Document 4.26.2018.pdf

Date and Time Comment Was Submitted: 2018-06-27 05:15:36

No Duplicates.

**Comment 22 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Tim  
Last Name: Sasseen  
Email Address: tim.sasseen@ballard.com  
Affiliation: Ballard Power Systems

Subject: Submission for ICT comments  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/31-cleantransit-ws-UjAGYQRpUG8CZVUn.pdf](http://www.arb.ca.gov/lists/com-attach/31-cleantransit-ws-UjAGYQRpUG8CZVUn.pdf)

Original File Name: Ballard Comments on ICT 2018-06-28.pdf

Date and Time Comment Was Submitted: 2018-06-28 09:42:02

No Duplicates.

**Comment 23 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Ray  
Last Name: Pingle  
Email Address: Ray\_Pingle@msn.com  
Affiliation:

Subject: ACT Coalition Partners Comments on ICT Prop Regulation  
Comment:

Please see our attached comments document.

Attachment: [www.arb.ca.gov/lists/com-attach/32-cleantransit-ws-VjcAZQZzBQkLbgRr.pdf](http://www.arb.ca.gov/lists/com-attach/32-cleantransit-ws-VjcAZQZzBQkLbgRr.pdf)

Original File Name: ACT Coalition Partners Comments on ICT Proposal - 6-28-18.pdf

Date and Time Comment Was Submitted: 2018-06-28 15:11:19

No Duplicates.



## **Comment 24 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Paul  
Last Name: Eggert  
Email Address: eggert@cs.ucla.edu  
Affiliation: UCLA Computer Science Department

Subject: Innovative Clean Transit (June 11 draft proposed regulation)  
Comment:

I am writing to support the June 11, 2018 draft proposed Innovative Clean Transit regulation. I work at UCLA, where my office overlooks the Ackerman bus turnaround at the north end of Westwood Boulevard. I have already noticed the improvement in the campus environment air quality and noise due to the BruinBus fleet's retirement of its last diesel buses and its introduction of a few battery-powered buses in fall 2016. UCLA and other transit authorities should continue to transition to battery and/or fuel-cell electric buses as soon as possible. Our lungs and our climate are too precious to waste, and as a Californian with three California children I urge you to pass these regulations, for our children's benefit as well as our own.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-07-01 14:58:32

No Duplicates.

## **Comment 25 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Jan

Last Name: Dietrick

Email Address: jdietrick9@gmail.com

Affiliation: 350 Ventura County Climate Hub

Subject: Accelerate transition to all electric buses

Comment:

It is time to electrify all buses for the sake of the climate and public health. In Ventura County we want a mandate that tells Ventura County Transportation Commission to not buy any more diesel or LNG buses. We are pleased that Gold Coast Transit is looking in that direction including potential for solar charging at its new facility. We are not aware that the school districts are thinking about this.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-07-02 02:37:26

No Duplicates.

**Comment 26 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Kent  
Last Name: Leacock  
Email Address: KLeacock@Proterra.com  
Affiliation:

Subject: Proterra Comments on ICT  
Comment:

See attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/35-cleantransit-ws-Vz4FYAN2BAgDZgVq.pdf](http://www.arb.ca.gov/lists/com-attach/35-cleantransit-ws-Vz4FYAN2BAgDZgVq.pdf)

Original File Name: ICT Comment Letter\_Proterra\_Final.pdf

Date and Time Comment Was Submitted: 2018-07-02 13:23:55

No Duplicates.

**Comment 27 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Joy  
Last Name: Alafia  
Email Address: joy@westernpga.org  
Affiliation: Western Propane Gas Association

Subject: Innovative Clean Transit Regulation  
Comment:

Please reference the attached comments submitted on behalf of the Western Propane Gas Association.

Attachment: [www.arb.ca.gov/lists/com-attach/36-cleantransit-ws-UyQAdgdhAjbQCQNq.pdf](http://www.arb.ca.gov/lists/com-attach/36-cleantransit-ws-UyQAdgdhAjbQCQNq.pdf)

Original File Name: WPGA\_ITA CommentsSubmitted7\_2\_18.docx.pdf

Date and Time Comment Was Submitted: 2018-07-02 16:14:02

No Duplicates.

**Comment 28 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Abhilasha

Last Name: Bhola

Email Address: abhola@jobstomoveamerica.org

Affiliation: Jobs to Move America

Subject: Labor Comments on ICT Rule

Comment:

Please see attached comments

Attachment: [www.arb.ca.gov/lists/com-attach/37-cleantransit-ws-B2YAdFAzAw9VP1Uw.docx](http://www.arb.ca.gov/lists/com-attach/37-cleantransit-ws-B2YAdFAzAw9VP1Uw.docx)

Original File Name: ARB Letter July 2018.docx

Date and Time Comment Was Submitted: 2018-07-02 18:55:18

No Duplicates.

**Comment 29 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Hitesh  
Last Name: Soneji  
Email Address: hsoneji@olivineinc.com  
Affiliation: Olivine

Subject: Olivine Comments on CARB ICT Proposed Regulation  
Comment:

Please review attached comments from Olivine, Inc.

Attachment: [www.arb.ca.gov/lists/com-attach/38-cleantransit-ws-Uj0Ba1A4ACVWOQRq.pdf](http://www.arb.ca.gov/lists/com-attach/38-cleantransit-ws-Uj0Ba1A4ACVWOQRq.pdf)

Original File Name: OlivineComments-CARB-ICT-Proposal-20180702.pdf

Date and Time Comment Was Submitted: 2018-07-02 22:31:22

No Duplicates.

## **Comment 30 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Abhilasha

Last Name: Bhola

Email Address: abhola@jobstomoveamerica.org

Affiliation: Jobs to Move America

Subject: Labor Comments on ICT Rule

Comment:

Please see attached comments with small typos fixed.

Attachment: [www.arb.ca.gov/lists/com-attach/39-cleantransit-ws-BmcAdFIxUFwEbgZj.docx](http://www.arb.ca.gov/lists/com-attach/39-cleantransit-ws-BmcAdFIxUFwEbgZj.docx)

Original File Name: ARB Letter July 2018.docx

Date and Time Comment Was Submitted: 2018-07-03 09:52:25

No Duplicates.

## **Comment 31 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Felicia

Last Name: Bander

Email Address: feliciabander@gmail.com

Affiliation:

Subject: Electric Busses for CA

Comment:

Let California be example that we can power our transit systems with electricity. We can employ our community members by offering jobs locally manufacturing electric busses. We want to have the cleanest air possible in California, I support electric busses

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-07-04 17:40:38

No Duplicates.



**Comment 32 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Lauren  
Last Name: Burke  
Email Address: info@calzev.org  
Affiliation: CalZEV

Subject: CalZEV strongly supports the timely adoption of the ICT  
Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/42-cleantransit-ws-AmFUMwZrAyoEZwZw.pdf](http://www.arb.ca.gov/lists/com-attach/42-cleantransit-ws-AmFUMwZrAyoEZwZw.pdf)

Original File Name: CalZEV\_CARB ICT letter 7-2-18.pdf

Date and Time Comment Was Submitted: 2018-07-05 08:06:00

No Duplicates.

**Comment 33 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Kathryn

Last Name: Engel

Email Address: kengel@glendaleca.gov

Affiliation: City of Glendale

Subject: OPPOSE ICT Regulation

Comment:

Transit agencies that do not receive any state funding should be exempt from the proposed rule. Please see attached letter from the city of Glendale.

Attachment: [www.arb.ca.gov/lists/com-attach/43-cleantransit-ws-VDsFcwZ3VmoCd1Uw.pdf](http://www.arb.ca.gov/lists/com-attach/43-cleantransit-ws-VDsFcwZ3VmoCd1Uw.pdf)

Original File Name: Oppose ICT Glendale.pdf

Date and Time Comment Was Submitted: 2018-07-16 12:01:26

No Duplicates.

**Comment 34 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Todd

Last Name: Campbell

Email Address: todd.campbell@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: Clean Energy Comments on proposed ICT Rulemaking  
Comment:

Dear ARB Staff, Thank you for the opportunity. Best regards, Todd

Attachment: [www.arb.ca.gov/lists/com-attach/44-cleantransit-ws-BTJReVBgUjkBKQIw.pdf](http://www.arb.ca.gov/lists/com-attach/44-cleantransit-ws-BTJReVBgUjkBKQIw.pdf)

Original File Name: 7.18.2018 Clean Energy Final ICT Comments.pdf

Date and Time Comment Was Submitted: 2018-07-18 12:42:43

No Duplicates.

**Comment 35 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Charles

Last Name: Love

Email Address: charles.love@trilliumcng.com

Affiliation: Trillium USA Company, LLC.

Subject: Trillium Comments ITC Draft Proposed Regulatory Summary

Comment:

Shirin

Good afternoon.

I am submitting our comments concerning the ITC Draft Proposed Regulatory Summary.

Thank you and have a great day.

Charles Love

Attachment: [www.arb.ca.gov/lists/com-attach/45-cleantransit-ws-ViJdKVI6AD8AagJr.pdf](http://www.arb.ca.gov/lists/com-attach/45-cleantransit-ws-ViJdKVI6AD8AagJr.pdf)

Original File Name: Trillium letter CARB 2018.07.19 signed.pdf

Date and Time Comment Was Submitted: 2018-07-19 11:36:05

No Duplicates.

**Comment 36 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Michael

Last Name: Pimentel

Email Address: michael@caltransit.org

Affiliation: California Transit Association

Subject: Response to Innovative Clean Transit Draft Proposed Regulation Summary

Comment:

Response letter attached here.

Attachment: [www.arb.ca.gov/lists/com-attach/46-cleantransit-ws-VjAFaII9VmRVPwRb.pdf](http://www.arb.ca.gov/lists/com-attach/46-cleantransit-ws-VjAFaII9VmRVPwRb.pdf)

Original File Name: Final CTA Response to ICT Summary - 7-19-18.pdf

Date and Time Comment Was Submitted: 2018-07-19 12:12:17

No Duplicates.

**Comment 37 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Hannah  
Last Name: Goldsmith  
Email Address: hannah@caletc.com  
Affiliation: CalETC

Subject: CalETC Comments Re ICT Draft Proposed Regulation Summary  
Comment:

Please find CalETC's comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/47-cleantransit-ws-BWYCZQRpWG5RIwVm.pdf](http://www.arb.ca.gov/lists/com-attach/47-cleantransit-ws-BWYCZQRpWG5RIwVm.pdf)

Original File Name: CalETC Comments Re ICT Draft Proposed Regulation Summary Final.pdf

Date and Time Comment Was Submitted: 2018-07-19 12:38:57

No Duplicates.

## **Comment 38 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Lawson

Email Address: thomas@cngvc.org

Affiliation: CA Natural Gas Vehicle Coalition

Subject: CNGVC 's Comments on the Proposed ICT Regulation  
Comment:

Hi ,

Attached are our comments.

Thank you.

Thomas Lawson  
President, CNGVC

Attachment: [www.arb.ca.gov/lists/com-attach/48-cleantransit-ws-BmVQOARiWXwFYFMM.pdf](http://www.arb.ca.gov/lists/com-attach/48-cleantransit-ws-BmVQOARiWXwFYFMM.pdf)

Original File Name: CNGVC Comments on ICT Regulation 7.20.18 Final.pdf

Date and Time Comment Was Submitted: 2018-07-20 13:19:50

No Duplicates.

**Comment 39 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Mary  
Last Name: Gilbert  
Email Address: mary@sanbenitocog.org  
Affiliation: San Benito County Local Transportation A

Subject: Innovative Clean Transit Regulation Concept  
Comment:

Comments from the SAn Benito County Local Transportation Authority, a small rural operator based in Hollister, CA are attached.

Thank you for your consideration of our rural needs as you develop these program concepts.

Attachment: [www.arb.ca.gov/lists/com-attach/49-cleantransit-ws-UDwBYl0oWX4AYwl7.pdf](http://www.arb.ca.gov/lists/com-attach/49-cleantransit-ws-UDwBYl0oWX4AYwl7.pdf)

Original File Name: Letter -SBC LTA to ARB.pdf

Date and Time Comment Was Submitted: 2018-07-20 16:17:18

No Duplicates.



## **Comment 40 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: George

Last Name: Sparks

Email Address: glspvta@gmail.com

Affiliation: Pomona Valley Transportation Authority

Subject: Comments on ICT Regulation Concept

Comment:

The Pomona Valley Transportation Authority (PVRTA) is a specialized transportation provider in the four Pomona Valley cities of Claremont, La Verne, Pomona and San Dimas located in eastern Los Angeles County. The PVRTA's comments on ARB's ICT regulation concept paper dated June 11, 2018 are attached.

Attachment: [www.arb.ca.gov/lists/com-attach/50-cleantransit-ws-ViYAcFInAzEDWgRn.pdf](http://www.arb.ca.gov/lists/com-attach/50-cleantransit-ws-ViYAcFInAzEDWgRn.pdf)

Original File Name: PVRTA Comment ICT Concept .pdf

Date and Time Comment Was Submitted: 2018-07-21 16:36:20

No Duplicates.

## **Comment 41 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Claire  
Last Name: Broome  
Email Address: cvbroome@gmail.com  
Affiliation: Adjunct Professor Public Health Emory U

Subject: support rapid deployment of electric buses

Comment:

Electric buses are a smart approach to vehicle electrification given defined ranges, clear locations for charging, low cost of maintenance and cost of operation.

Furthermore, as a professor of public health, California should NOT be allowing diesel pollution of our air and the clear health damage it causes.

"Clean" natural gas is also not a viable alternative as the assessment of lifetime climate impact of gas MUST include leakage along entire system of wells through distribution--not just the end vehicle combustion.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-07-23 12:52:45

No Duplicates.

**Comment 42 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Glen

Last Name: Tepke

Email Address: gtepke@bayareametro.gov

Affiliation: Metropolitan Transportation Commission

Subject: MTC Comments on CARB ICT Proposal

Comment:

Please attached Metropolitan Transportation Commission comment letter on CARB Innovative Clean Transit proposaL.

Attachment: [www.arb.ca.gov/lists/com-attach/52-cleantransit-ws-VzoAclQ2AAwFYARl.pdf](http://www.arb.ca.gov/lists/com-attach/52-cleantransit-ws-VzoAclQ2AAwFYARl.pdf)

Original File Name: MTC CARB ICT Comment Letter - July 23 2018.pdf

Date and Time Comment Was Submitted: 2018-07-23 16:56:32

No Duplicates.

**Comment 43 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Abhilasha

Last Name: Bhola

Email Address: abhola@jobstomoveamerica.org

Affiliation: Jobs to Move America

Subject: Updated Signatories of ICT Rule

Comment:

Updated letter with additional signatures

Attachment: [www.arb.ca.gov/lists/com-attach/53-cleantransit-ws-VzZUIFc0UFxWPAls.docx](http://www.arb.ca.gov/lists/com-attach/53-cleantransit-ws-VzZUIFc0UFxWPAls.docx)

Original File Name: ARB Letter July 2018.docx

Date and Time Comment Was Submitted: 2018-07-23 17:11:48

No Duplicates.

## **Comment 44 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Chris

Last Name: Gilbert

Email Address: [chris@gilbertbiz.com](mailto:chris@gilbertbiz.com)

Affiliation:

Subject: 100% clean buses using renewable, carbon-free energy

Comment:

It is important that only 100% ZEB buses be in operation at transit agencies by 2040 and thereafter in the state of California. That means no diesel or CNG buses could be purchased beyond the mid-2020s.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-07-23 18:40:23

No Duplicates.

**Comment 45 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Kevin  
Last Name: Maggay  
Email Address: kmaggay@semprautilities.com  
Affiliation: SoCalGas

Subject: SoCalGas Comments on ICT  
Comment:

Attached are SoCalGas comments on the proposed Innovative Clean Transit Rule.

Attachment: [www.arb.ca.gov/lists/com-attach/55-cleantransit-ws-WygHY1A2UFxRNFc4.pdf](http://www.arb.ca.gov/lists/com-attach/55-cleantransit-ws-WygHY1A2UFxRNFc4.pdf)

Original File Name: SCG Comments July 23.pdf

Date and Time Comment Was Submitted: 2018-07-23 21:11:38

No Duplicates.

**Comment 46 for Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) - 1st Workshop.**

First Name: Nina

Last Name: Kapoor

Email Address: [nina@rngcoalition.com](mailto:nina@rngcoalition.com)

Affiliation: Coalition for Renewable Natural Gas

Subject: Comments on the Innovative Clean Transit (ICT) Draft Proposed Regulation Summary  
Comment:

Please find attached the RNG Coalition's comments on the ICT Draft  
Proposed Regulation Summary.

Attachment: [www.arb.ca.gov/lists/com-attach/56-cleantransit-ws-W2pXaVdmB2MFMQU2.docx](http://www.arb.ca.gov/lists/com-attach/56-cleantransit-ws-W2pXaVdmB2MFMQU2.docx)

Original File Name: 180723 RNG Coalition Comments ICT FINAL.docx

Date and Time Comment Was Submitted: 2018-07-23 22:04:04

No Duplicates.

**There are no comments posted to Innovative Clean Transit Regulation – How to Transition to a Zero Emission Public Transit System (cleantransit-ws) that were presented during the Workshop at this time.**