



February 15, 2019

Board of Directors
California Air Resources Board
1001 I Street, P.O. Box 2815
Sacramento, CA 95812-2815

Via Electronic Submittal

Re: Support for Proposed Zero-Emission Airport Shuttle Regulation

Dear Chair Nichols and Board Members,

Sierra Club California appreciates the opportunity to express our strong support for the Proposed Zero-Emission Airport Shuttle Bus Rule.

Already, several California Airports either are operating or in the process of ordering and deploying zero-emission battery-electric shuttle buses including Los Angeles International Airport (LAX) with 20 buses, Wally Park Premier shuttle service at LAX has a fleet of 33 buses, Mineta San Jose International Airport with its 100 percent zero-emission fleet of 10 buses, Sacramento International airport with five buses, and Ontario International Airport with three buses.

The state seeks to achieve legal and regulatory state and federal requirements as well as those set by Gubernatorial Executive Orders to achieve significant reductions in health-harming criteria pollutants and climate change causing greenhouse gas (GHG) emissions. This rule will make a material contribution to achieving these through transitioning airport shuttle buses to zero emission by no later than 2035. Along with the recently approved innovative clean transit rule, it will help pioneer the electrification of medium and heavy-duty transportation applications to zero-emission vehicles.

Airport shuttle buses are an ideal transportation vocation to lead in this effort as they follow fixed and generally shorter routes and are depot based.

We congratulate the California Air Resources Board staff for developing, with significant stakeholder input, such a simple, easy to understand rule that is also so effective in meeting emission reduction goals. Its paced approach will make the rule cost effective for fleet owners.

Having zero-emission buses in operation at California airports will also give a significant portion of residents the opportunity to personally experience the benefits of pollution-free transportation including a quiet, vibration-free ride. This can help increase public support for broader implementation of zero-emission transportation. Further, zero-emission shuttle buses may both

inspire and provide infrastructure support for the transition of additional airport service vehicles to zero emission.

The total cost of ownership for these vehicles is positive. Significant financial support programs are available to help provide the upfront capital needed to pay for the acquisition of buses and infrastructure as well as to help with operating costs. Some of these include the FAA annual grant programs, the state's Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP), the Low Carbon Fuel Standard (LCFS) program and utility charging infrastructure payment and implementation programs. This proposed rule is economically feasible and cost effective.

California is making phenomenal progress on the cleanliness of its grid power. Existing law requires the investor-owned utilities (IOUs) to achieve a 33 percent renewable portfolio standard (RPS) by 2020. Although, according to the November 2018 Report to the Legislature on the status of RPS, the three IOUs (which provide about 70 percent of the electricity in the state) are projecting to achieve 50 percent RPS in 2020. When you add 11 percent of power from hydro and 7 percent from nuclear, the state will be producing well over 60 percent of its electricity GHG free.

The electricity for these vehicles is already low in GHG emissions and getting better all the time. Because the efficiency of an electric drive train is five times more efficient than a CNG or diesel bus, the GHG and criteria pollutants from zero-emission buses per mile is extremely low. When the electricity is produced on-site from renewable sources, such as solar power, the total emissions from both the vehicles and their fuel is zero.

This rule offers many benefits including reductions in criteria pollutants especially in disadvantaged communities, reductions in GHGs and mitigating climate change, growing the California economy, creating new good paying jobs, improvements in worker health, long-term financial savings for airports and shuttle operators and once again offering a model for airports throughout the nation on how to transition to zero-emission vehicles.

Sincerely,



Katherine Garcia
Policy Advocate



Ray Pingle
Lead Volunteer, Electric Vehicles