



April 7, 2017

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on 2030 Target Scoping Plan

Dear Chair Nichols:

Monterey-Salinas Transit (MST) staff participated in the public workshop ARB hosted on January 27, 2017 and appreciates this opportunity to comment on *The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target* (Proposed Scoping Plan).

Agency Background

MST was created by California law AB 644 and formed July 1, 2010. Current members of the district are the cities of Carmel, Del Rey Oaks, Gonzales, Greenfield, King City, Marina, Monterey, Pacific Grove, Salinas, Sand City, Seaside, Soledad and the County of Monterey. The MST board of directors appoints the agency's general manager/CEO. MST has a staff of nearly 250 employees, which includes operations, maintenance and facilities, and administration. MST serves a 295-square mile area of Monterey County, Santa Cruz County, Santa Clara County and San Luis Obispo County.

MST is the sole public transportation provider in Monterey County, which includes disadvantaged communities as defined by California SB535. MST operates a fleet of over 150 vehicles including low-floor transit buses, over-the-road coach commuter buses, cutaway buses, as well as historically-themed trolley buses. MST has already begun its transformation to cleaner transit options by retrofitting a diesel trolley bus with an all-electric engine in 2015 and in operating four diesel-electric hybrid vehicles since 2013. In addition, the agency is currently completing a study to help plan its transition toward cleaner public transit options for the residents of and visitors to Monterey County.

Comments on Scoping Plan

MST is pleased that the Proposed Scoping Plan highlights the importance of existing measures that strengthen transit, while alluding to potential new measures that the ARB may pursue to accelerate

Advocating and delivering quality public transportation as a leader within our community and industry.

Transit District Members Monterey County • Carmel-by-the-Sea • Del Rey Oaks • Gonzales • Greenfield • King City • Marina • Monterey
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affordable transit-oriented and infill development, expand access to transit, reduce commute trips and maximize the use of alternatives to the automobile.

Of interest to MST is Table V-1. Climate Change Policies and Measures. The table identifies a mobile source strategy to advance clean transit by requiring 20% of new urban buses purchased beginning in 2018 to be zero emission buses and ramping up to 100% of new sales in 2030. While this is an admirable goal, it will be difficult for transit agencies like MST where so many of the vehicles operate daily duty cycles that go beyond what battery-electric vehicle options can support. For example, our long-distance commuter buses travel over 500 miles each day, and no alternative vehicle on the market today can accommodate that range. Transitioning to a zero-emission fleet must not affect our ability to maintain or expand service. In addition, MST's facilities staff has analyzed the power availability at our Salinas maintenance garage and has found that it can support only two electric buses, which have been already ordered and are due for delivery later this year. Any additional buses would require substantial capital expenditures to bring more power to the facility. As electric buses still cost significantly more than diesel buses, plus the added capital costs to expand power connections to charge these vehicles, the proposed 20% mandate for 2018 is doubly punitive. For these reasons, MST requests that ARB modify this strategy to eliminate the purchase mandate in 2018.

Again, MST appreciates the opportunity to assist ARB in this important endeavor. For additional information, please contact me (831) 264-5001.

Sincerely,



Carl G. Sedoryk
General Manager/CEO