May 3, 2018

Mary Nichols, Chair

California Air Resources Board

1001 “I” Street

Sacramento, CA 95814

Subject: Innovative Clean Transit Regulation

Dear Chair Nichols:

Golden Empire Transit District (GET) is the public transit operator in metropolitan Bakersfield. We presently operate a fleet of 88 40 foot Compressed Natural Gas (CNG) fueled transit buses, two CNG fueled over the road commuter coaches and 25 CNG fueled cut away vehicles used in Americans with Disabilities Act (ADA) paratransit service. We are writing today regarding the proposed Innovative Clean Transit Regulation and the possible requirement for us to convert our fleet to all Zero Emission Buses (ZEB) by 2040.

GET is a member of the California Transit Association and we have been following closely the development of their counterproposal. We urge the ARB to adopt the Association’s counterproposal in full. At GET we are not opposed to embracing new technology, however, we have concerns about ZEB cost to implement and to operate, about the present performance and reliability of the technology, and the cost and other realities of training our employees to maintain and manage these new fleets.

GET cannot articulate any better than the Associations has already regarding the transit community’s concerns and proposed remedies, but we would like to share our particular circumstances that make the proposed Innovative Clean Transit Regulation (ICT) troublesome for us and why regulatory flexibility and the opportunity to develop an individualized plan for introduction of ZEB technology is important.

GET is scheduled to replace 30 of its CNG transit buses in 2020-2021. As we understand the ICT, we would be required to make 25% of that purchase ZEBs. At this time, we do not have funds to fund the differential in the cost between a CNG bus and a ZEB. Nor do we have funding for the charging infrastructure. Assuming the funding hurdle can be overcome, we have another reality that we will be dealing with. The Californian High Speed Rail Authority (CHSRA) has identified GET’s present maintenance and operations facility as the preferred location for the high speed train station in Bakersfield. The CHSRA has assured us that by late 2018 or early 2019 they will be able to commence the process for early acquisition of GET’s property and relocation of GET’s facilities. The process of negotiating with the CHSRA for an equitable settlement, purchase of new property, design of a new facility, construction and relocation is anticipated to take up to five years. For a smaller agency like GET, this is large undertaking.

The GET Board of Directors is particularly sensitive to not wanting to invest taxpayer dollars in our old facilities if we are going to be moving to a new facility in a reasonably short time. To purchase six ZEBs in 2020 would require us to modify our old facilities and install charging infrastructure in an obsolete facility. It would also require us to modify our fleet deployment and route design as each of our buses travels an average of 250 miles per day; something the present ZEBs are not able to do reliably. With a small staff, these are strategic decisions that require significant consideration.

At GET, we have no experience in the deployment of zero emission technology. We are proud of the fact that we were one of the first all CNG fleets in the state and are willing to embrace new technology, but it needs to be accomplished in a thoughtful manner, not a one-size fits all way. We are willing to develop a ZEB deployment plan detailing our individualized strategy for introducing ZEBs and attaining a 100% ZEB fleet. We need, however, the knowledge, support facilities, personnel and not least of all the funding to achieve this. Given GET’s present facilities challenges, the state of the technology and the lack of funding we are skeptical that we can be ready to deploy by 2020.

We ask that you please give thoughtful consideration to the Association’s well thought out and vetted counterproposal for deployment of ZEB technology in transit fleets in California. Should you have any questions or need more information feel free to contact me at (661)324-9874 or [kking@getbus.org](mailto:kking@getbus.org).

Sincerely,

Karen H. King

Chief Executive Officer

cc: GET Board of Directors

Michael Pimentel, California Transit Association