



Metropolitan Transit System

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15-8-6

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

SUBJECT: California Air Resources Board (CARB) Mobile Source Strategy Discussion Draft
(Agenda Item 15-8-6)

Dear Chairman Nichols:

The San Diego Metropolitan Transit System (MTS) appreciates the opportunity to comment on the Mobile Source Strategy Discussion Draft. Our agency supports the State's efforts to pursue a comprehensive strategy to meet air quality standards and greenhouse gas and petroleum reduction targets, however we ask that the Board allow MTS and other transit agencies to continue to work with staff to propose a more effective urban bus strategy than the one included in the Draft.

The Discussion Draft (Chapter 6) provides a synopsis of the Advanced Clean Transit measure that would apply to urban bus service like ours. The proposal is to require a minimum purchase requirement for zero emission buses (ZEB) starting in 2018 with increases until the requirement reaches 100% in twelve years. MTS has appreciated CARB staff's willingness to discuss its proposal with our agency as it has refined it over the past several years, but we feel that the proposal needs significant modification.

While the proposed ZEB purchase requirements are intended to spur the market into creating technology that could be affordable and easily placed into revenue service by transit operators throughout the state, the technology is not yet ready for the proposed level of use in urban transit. The very limited and recent tests being conducted by California transit operators have not been sufficient to demonstrate that the technology is durable or reliable. There are only three manufacturers available to California agencies, and their charging technologies are all proprietary and therefore not interchangeable. It is not clear that these manufacturers could even accommodate a 15 percent purchase requirement in 2018, given that the 53 current ZEBs in California account for only .5 percent of all buses in California. The lack of competition in today's market diminishes the need for manufacturers to innovate or reduce cost. The limited battery storage capacity makes introduction on most urban routes impossible. All of these factors lead to the conclusion that implementation of a minimum purchase requirement is not yet feasible and would have detrimental consequences.

MTS requests that CARB consider overall performance goals for transit operators to achieve reductions, rather than prescribing a specific technology. Transit operators' investments in clean technologies to date are not extensively cataloged in the Discussion Draft, but they have



been considerable and effective. MTS operates transit service over 3,240 total square miles in San Diego County, and provides an environmentally-friendly transportation option to ten cities, the unincorporated County, and the international border. MTS has built and continues to expand an extensive electric powered, zero emission light rail network. Eighty-six percent of our 617 heavy duty buses have been replaced with Compressed Natural Gas (CNG) buses in keeping with our commitment to cleaner fuel technology. It is our goal to replace nearly 100 percent of the fleet by 2017. MTS has embraced CARB's commitment to CNG vehicles at a considerable cost to the transit system, a cost that we continue to absorb today. We are currently replacing an existing maintenance facility to allow it to accommodate CNG buses at a cost of \$45 million.

In addition, MTS has begun to develop new technologies in our fleet, including the introduction of 12 electric hybrids, and the scheduled replacement of our 32 gasoline powered mini buses with cleaner propane powered vehicles. Our agency has also taken the significant step of ensuring that by 2016 we will be fueled entirely with renewable biogas. All of these actions have diminished MTS's emissions footprint and impact on air quality to near zero. We welcome the opportunity to work with CARB staff in creating a set of performance targets for our industry, with a tool kit of options for how to achieve those targets.

Rather than achieving the Mobile Source Strategy's goals, implementing staff's Advanced Clean Transit proposal will have significant adverse impacts on the environment due to the reduction in transit service it will cause. As the primary operator in San Diego County, MTS would be forced to expend funds it uses to provide transit service to pay for the higher capital and operating costs associated with ZEB technology. A 15% ZEB purchase requirement would equal an additional capital cost of \$8 million for MTS in 2018, with unknown costs associated with facility and utility infrastructure modifications. Add to this additional operating expenses associated with the inflexible technology, along with the doubling of energy costs, and the estimated amount of service that would need to be cut in 2018 equates to three of our most urban bus routes which carry 16,000 passengers a day, 5.3 million passengers a year.

The trade-offs to accommodate the added cost to implement the Advanced Clean Transit proposal would have the greatest impact on low income, minority and disabled communities. MTS's customer base is 71 percent transit dependent, and 80 percent low income and/or minority. A full two thirds of passengers live in households with annual incomes less than \$30,000. They rely on MTS to get to jobs, medical appointments, religious services and school. Reduced service, delayed light rail expansion and other cost offsets would have a compounded, quality of life impact on these populations.

The Discussion Draft indicates that increased federal funding could be relied on to help cover the additional expenses associated with implementation. Federal funding is applied based on long standing formulas and does not take into account increased expenses caused by state air regulations. While there have been discussions regarding more funding for transit, the federal government has yet to act. MTS asks the Board to reconsider near term implementation of a ZEB purchase requirement, and instead to create a funding coalition to seek federal assistance to implement a comprehensive air quality and greenhouse gas reduction strategy for California. We would encourage the Board to develop an outreach and education plan to work with the federal government on an expansion of federal funding for even cleaner transit bus funding options. We would view this as essential for your objectives to be realized.

MTS is committed to working with CARB staff to create a Mobile Source Strategy that will achieve the goals of improved air quality, reduced reliance on petroleum, and reduced

greenhouse emissions. We ask that you reconsider the Discussion Draft in light of our comments and appoint a transit advisory team to work through these essential issues and avoid unintentional consequences like transit service reductions impacting our most vulnerable riders.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Paul Jablonski', enclosed within a large, loopy oval shape.

Paul Jablonski
Chief Executive Officer

cc: California Air Resources Board Members