



February 19, 2019

Mary Nichols
Chair, California Air Resources Board
1001 I Street, P.O. Box 2815
Sacramento, CA 95812-2815

RE: Support for Zero-Emission Airport Shuttle Bus Standard

Submitted online via CARB's Web Comment Submittal Form

Dear Chair Nichols and Board:

On behalf of the Union of Concerned Scientists, Earthjustice, and Environment California, we are writing in support of the Zero-Emission Airport Shuttle Standard. The proposal – identified in the State Implementation Plan – is an important step towards reducing air pollution and global warming emissions from the transportation sector.

Californians experience some of the most polluted air in the United States. Air pollution, and the resulting health risks, disproportionately affect lower income communities and communities of color. Recent work shows that African American and Latino Californians are exposed to 43 percent and 39 percent higher PM_{2.5} emissions from on-road transportation sources, respectively, than white Californians.¹

The transportation sector is also the largest source of global warming emissions in California. Despite reductions in the state's total global warming emissions over the last four years (2013-2016), the transportation sector has experienced increased emissions.²

Zero-emission vehicles, including airport shuttle buses, are critical to improving air quality and reducing global warming emissions. In addition to zero tailpipe emissions, battery and fuel cell electric buses have 75 percent lower life cycle global warming emissions than diesel and natural gas buses on today's grid in California.³

In an assessment of medium- and heavy-duty battery electric truck and bus technology, CARB identified airport shuttles buses as well-suited for electrification. The operational characteristics of these vehicles (e.g., fixed routes, short routes, stop- and go- operation, and low average speeds) are well matched to battery electric technology on the road today.

¹ Reichmuth, D. 2019. Inequitable Exposure to Air Pollution from Vehicles in California. Cambridge, MA: Union of Concerned Scientists. Online at www.ucsusa.org/sites/default/files/attach/2019/02/cv-air-pollution-CA-web.pdf.

² California Air Resources Board. 2018. California Greenhouse Gas Inventory for 2000-2016. Online at www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_sum_2000-16.pdf.

³ Chandler, S., J. Espino, and J. O'Dea. 2017. Delivering opportunity: How electric buses and trucks can create jobs and improve public health in California. Cambridge, MA, and Berkeley, CA: Union of Concerned Scientists and The Greenlining Institute. Online at www.ucsusa.org/sites/default/files/attach/2016/10/UCS-Electric-Buses-Report.pdf.

We support the standard's proposed targets that 33 percent of private and public airport shuttle fleets be zero-emission by December 31, 2027, 66 percent by December 31, 2031 and 100 percent by December 31, 2035. These targets provide certainty in the transition to zero-emission vehicles, and we encourage fleets to transition their vehicles even faster to achieve greater air quality and climate benefits. The standard protects against backsliding by ensuring fleets do not revert to combustion vehicles in the future.

The proposal's compliance schedule provides a voluntary, early action period that provides fleets the opportunity to benefit from incentive funding. Significant state funding is available to support the early adoption of zero-emission vehicles serving airports.

We believe the proposed rule establishes reasonable targets and affords generous compliance flexibility. We urge the Board to not expand exemptions for "reserve" shuttles beyond 3,000 miles per vehicle per year. A strong rule is necessary to protect public health, reduce global warming emissions, and advance zero-emissions technologies in other sectors.

Sincerely,

/s/

Jimmy O'Dea, Ph.D.
Senior Vehicles Analyst
Union of Concerned Scientists

Paul Cort
Staff Attorney
Earthjustice

Dan Jacobson
Director
Environment California