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May 29, 2018

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

RE: Innovative Clean Transit Regulation

Dear Chair Nichols and Members of the California Air Resources Board:

On behalf of the San Mateo County Transit District (SamTrans), I submit the following comments in response to the "Update on Innovative Clean Transit Discussion Document" (Update). SamTrans operates San Mateo County's bus and paratransit service, and strongly supports policies that will shift the California bus fleets to zero-emission buses. However, when we wrote to you last in February 2018, we argued that the policies proposed by your staff are beyond what is reasonable for our agency and others to achieve. We believe that the proposal submitted to you by the California Transit Association on April 27th, provides a viable path forward, and we encourage you and your staff to give it strong consideration.

As you know, SamTrans is in the process of evaluating converting our fleet from diesel to 100% battery-electric. We have received grant funding for a pilot of 10 battery-electric buses and associated infrastructure, and are beginning the lengthy process of developing a fleet transition plan that will not impair our service or create undue financial hardship for our agency. The Association's proposal is compelling, because it starts with the requirement that each transit agency develop and submit a "zero-emission bus deployment plan." For us, this process is already underway, and we would simply fold our existing efforts into the broader zero-emission bus rule, adding in whatever new elements the rule requires. Most transit agencies would be charged with thinking through the funding, and technological and operational constraints that must be worked through to make zero-emission bus deployments successful. This approach is logical and appropriate, allowing each transit agency to craft a fleet transition plan that is tailored to their specific operation, and helps ensure success in introducing these new technologies.

SAN MATEO COUNTY TRANSIT DISTRICT
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Additionally, the District raised concerns with the financial feasibility of an aggressive introduction of zero-emission buses and with the state of the technology as it exists today, particularly given our need to service multiple long-distance routes. The Association's proposal addresses these concerns by requiring the California Air Resources Board (ARB) to establish benchmarks for the cost and performance of these technologies and by instituting a regulatory assessment that guarantees that transit agencies are only charged with accelerating their adoption of these technologies if they are meeting benchmarks set by the state. The Association's proposal would also free up incentive funding, ensuring that transit agencies have access to incentives whenever they are ready to purchase a zero-emission bus. Together, these provisions allow transit agencies to manage the risk of the transition to zero-emission bus technologies and provide encouragement to the original equipment manufacturers to continue to innovate.

Finally, we appreciate that both the Update and the Association's proposal would provide a temporary exemption from the regulation for cutaway buses. This is critical, as battery-electric technologies for these non-standard buses are nascent and could create issues for transit agencies related to compliance with the federal Americans with Disabilities Act, if they fail to perform. We would encourage ARB to also provide an exemption for over-the-road coaches, as these technologies are similarly unproven.

Again, the District thanks you for this opportunity to weigh in on this rule. Please feel free to contact Casey Fromson, Director of Government and Community Affairs at (650) 508-6493 or via email at fromsonc@samtrans.com if you need any additional information.

Sincerely,



Jim Hartnett
General Manager/Chief Executive Officer

cc: San Mateo County Transit District Board of Directors
San Mateo County Transit District State Legislative Delegation