May 29, 2018

Jack Kitowski, Chief, Mobile Source Control Division
Tony Brasil, Branch Chief, Heavy Duty Diesel Implementation Branch
California Air Resource Board
1001 I Street
Sacramento, CA 95814

RE: Innovative Clean Transit Draft Discussion Proposal --Golden Gate Transit Comments

Dear Mr. Kitowski and Mr. Brasil:

On behalf of the Golden Gate Bridge, Highway and Transportation District (District), I want to extend our appreciation for the time and effort you and your staff has spent in developing the Innovative Clean Transit Draft Discussion Document and the Update. The District respects and appreciates the fact that through the proposed Innovative Clean Transit (ICT) document, CARB is working to achieve its goal of "a long-term attainment of a zero-emission transit fleet in California." This is a very important goal, and Golden Gate Transit, which is the bus transit division of the District, would like to start taking measured steps to support it.

Golden Gate Transit (GGT) provides regional transit service in four counties, which include Sonoma, Marin, San Francisco, and Contra Costa Counties. Our primary charge is to connect citizens along the Highway 101 corridor to key, regional employment, transportation, medical and educational centers throughout the North Bay and San Francisco, as well as to BART in Contra Costa County. To cover this extensive service area, our buses can travel up to 400 miles on one fueling.

Given that most of our riders are Marin and Sonoma residents, who have the resources to drive to work, but choose to take GGT because of its reliability, convenience and comfort, it is critical that we utilize vehicles, which can reliably deliver the services they demand at a comfort level that meets their requirements. To address these demands half of GGT's fleet of nearly 200 vehicles consists of over-the-road coaches produced by MCI. These vehicles seat up to 57 passengers and meet our operational requirement of 400 miles on a single fueling. They are also much smoother and more comfortable than our standard 40-foot urban buses, which seat up to 41 passengers, during long freeway trips between counties.

Due to the increasing cost of driving to/from San Francisco, ridership on our buses during the peak commute is high, and we typically carry 30-55 passengers per bus trip. In addition, our buses travel along very hilly terrain and in varying climates between Sonoma, Marin and San Francisco. Consequently, we utilize our heating and air conditioning equipment at all times to ensure maximum comfort for our passengers.

- *Given these constraints, GGT requests that CARB defer the application of the ICT regulation to over-the-road coaches until 2030.* Similar to cutaways, a zero emission over-the-road coach that has the proven reliability to travel up to 400 miles on one charge, while climbing steep inclines with the HVAC system operating, does not currently exist. Extending the requirement to 2030 will give the market enough time to develop a proven vehicle that is not cost-prohibitive and can provide the level of service required.

- *In addition, we support CARB's willingness to allow transit agencies to submit a joint-compliance plan to meet the ICT requirements.* This could allow us to continue to work with our regional partners in the Metropolitan Transportation Commission (MTC) region, as demonstrated through our participation in the Zero Emission Bay Area (ZEBA) Fuel Cell Bus Demonstration, to meet the ICT requirements while transitioning towards a zero emission fleet without negatively impacting our ridership and service levels.

- *Another area of concern is that the ICT draft does not take into consideration the significant upfront investment and construction required for fueling, charging and maintenance infrastructure that must be in place prior to operating zero emission vehicles.* The rule must include a strong commitment from the Legislature and California Air Resource Board (CARB) for a multi-year funding commitment for rebates and infrastructure investments – these funds must be eligible for compliance with the regulations.

- *A key barrier in making zero emission technology financially feasible is addressing the uncertainty and volatility of electricity rates.* CARB should include as part of the ICT rule a resolution requiring the California Public Utilities Commission to adopt a fixed rate structure for public transit operators. Further, CARB should work with the Governor's office and legislature to ensure a fixed rate structure is in place before mandating transition to a 100% ZEB fleet.

The District also supports the proposal submitted by the California Transit Association (CTA) dated April 30, 2018, which offered the following:

- Instead of imposing a purchase mandate at the start, require each California transit agency to develop and submit to the ARB by 2020 a zero emission bus (ZEB) deployment plan outlining how they will transition to a fully ZEB fleet by 2040. If transit agencies are able to implement their plan, but fail to do so as demonstrated by their annual data submissions, CARB would then impose a purchase requirement by 2025. *GGT Perspective: This is a very reasonable approach for ensuring that all transit agencies are taking serious and methodical steps toward transitioning their fleets to zero emission, which we support.*

- Fund early deployments of ZEBs in DACs, state/federal non-attainment areas in California, and for transit agencies that demonstrate an expertise in ZEB technologies between 2020 and 2023. *GGT Perspective: GGT sits in a federal non-attainment area,*

and we applaud and appreciate the good work that others are doing to improve ZEB technology for all in the transit industry. Therefore, we are supportive of CARB prioritizing funding for the categories listed here.

- Uphold the Association's definition of funding as being: 1) new sources that do not come from the redirection of, or the application of new requirements to, the HVIP, TIRCP or LCTOP Programs, and 2) the amount equal to the incremental additional cost of ZEB technology compared to available baseline non-ZEB technology. *GGT Perspective: Existing sources of funding are critical for sustaining current levels of service in our communities, as well as for maintaining transit facilities and fleets in a state-of-good-repair.*

- Commit each transit agency to operating standard transit bus fleets that are 100% zero emission by 2040, provided barriers to ZEB deployment have been resolved. *GGT Perspective: Given the momentum among most transit agencies to transition to ZEBs, as well as the momentum among the nation's largest bus manufacturers to produce equipment that increasingly meets the needs of agencies, GGT thinks that this is a reasonable target.*

- Postpone the application of the ICT to cutaway buses and over-the-road (OTR) coaches until 2030. GGT Perspective: Viable ZEB options for these vehicle models are either extremely limited or non-existent at this time, and by 2030, more options should be available. *GGT Perspective: As stated above GGT operates buses on long, commuter routes that can reach 400 miles between fuelings through very hilly terrain. Over-the-road coaches are the best vehicles to meet our passenger demands over long distances. (Standard, low-floor, urban buses can only seat approximately 40 individuals comfortably, and they can be a pretty rough ride when moving at higher freeway speeds along the Highway 101 and Interstate 580 corridors.) Currently, there is no ZEB that can reliably accommodate such operating conditions. Deferring the regulation's application to over-the-road coaches should provide sufficient time for the development of a viable OTR coach for use in challenging operating environments.*

- Create benchmarks for future ZEB cost, performance and weight, among other things. *GGT Perspective: Most important to us is the fact that this can help encourage both manufacturers and transit agencies to help improve ZEB technology over time and bring the cost, performance, and weight of ZEBS much closer to that of standard vehicles today, which would serve to avoid any negative impacts to service levels and ridership. This will also help us track progress with the PUC and utilities in regulating the cost of electricity as a fuel, as well as in help us track infrastructure and funding availability.*

Overall, the Association's approach considers the unique operating environments and constraints of each transit agency, while supporting CARB's goal of transitioning transit fleets to zero emission by 2040, and the Golden Gate Bridge, Highway and Transportation District strongly supports this.

If you have any questions or need additional information about the District's transit services, please give me a call at 415-923-2203, or contact Mona Babauta, Deputy General Manager, Bus Division (Golden Gate Transit), at 415-257-4467 or at Mbabauta@goldengate.org.

Sincerely,

Denis J. Mulligan
General Manager

Cc: Senator Scott Wiener
Senator Mike McGuire
Senator Bill Dodd
Assemblymember Phil Ting
Assemblymember David Chiu
Assemblymember Marc Levine
Assemblymember Cecilia Aguiar-Curry
Assemblymember Jim Wood
Steve Cliff, Deputy Executive Officer, California Air Resources Board
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