



May 24, 2019

**RE: California Airports Council Comments on Zero-Emission Shuttle Bus Measure**

On behalf of the California Airports Council (CAC), I write to share our comments on the modified text of the proposed Zero-Emission Shuttle Bus Regulation impacting commercial airport hubs in the state. On February 21<sup>st</sup> the California Air Resources Board (CARB) heard the measure for the first time, and the hearing concluded with the Board's support of forward progress. This was accompanied with direction for staff to resume work on amending the regulation's language for final approval. We greatly appreciate CARB staff continuing discussion with airports on outstanding issues since the February hearing. As such, most areas have been resolved, however, it must be noted that concerns do remain regarding the shuttle bus reserve fleet definition and the negative impact the proposed regulation creates on California airport eligibility for federal grants through the Federal Aviation Administration's (FAA) Zero Emission Vehicle Program (ZEV).

Of utmost importance to airports is the safety and efficiency of passenger movement, as well as the effective use of resources. If at any point these areas are compromised, we ask that CARB work with the industry to resolve critical problems. To reiterate from our previous comment letter, the reserve fleet mileage has been set at 3,000 miles which may be difficult for the largest airports to stay under due to fleet readiness testing conducted approximately every 7-10 days. If airports cut back on testing, reliability of reserve buses diminishes significantly and will impede ability to respond to emergency situations that require immediate response to resume passenger throughput. Reserve fleets are already comprised of alternative fueled technologies and would not create a significant impact to emission reductions considering the affected airport reserve fleets total 35 buses throughout the entire state. Additionally, concern remains as to whether airports will be eligible for access to ZEV funding from the FAA due to the mandatory nature of the measure. Airports have and will continue to apply for these funds but as the turnover dates draw closer, eligibility will be damaged. We urge CARB to consider the adverse impacts to federal funding and support airports in seeking a remedy if the regulation negates eligibility. We understand CARB staff has made a commitment in response to legislative inquiries to revisit the regulation timeframes should California airports face ineligibility for the FAA's ZEV grants.

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In conclusion, airports are supportive of implementing cleaner technologies to reduce emissions and improve the air quality of local communities as can be seen with San Jose International's recent deployment of an electric shuttle fleet, Los Angeles International's purchase of twenty electric airside shuttles, and Sacramento International Airports ZEV grant from the FAA for five electric shuttles. Purchasing these zero-emission buses was prompted without the hand of regulatory enforcement, which again shows longstanding commitment to greener operations from the airport sector. Passing the Zero Emission Airport Shuttle Bus Regulation is only the first step in the process and there is much work to be done as airports continue to work internally and engage stakeholders as infrastructure is developed. We strongly encourage CARB staff to remain engaged and vigilant throughout, especially as definitive infrastructure costs are realized.

Thank you for the opportunity for provide feedback on the modified text for the proposed Zero-Emission Airport Shuttle Bus regulation.

Sincerely,

A handwritten signature in cursive script, reading "Jim Lites".

Jim Lites  
Executive Director