



**JOHN J. AGUILERA**  
DEPUTY MAYOR

August 13, 2018

Chair Nichols  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

Submitted via email to: Evan Kersnar, [Evan.Kersnar@arb.ca.gov](mailto:Evan.Kersnar@arb.ca.gov)

RE: Proposed Innovative Clean Transit (ICT) Regulation

Dear Chair Nichols and Members of the Board:

On behalf of the City of Vista, I write to provide feedback regarding the proposed Innovative Clean Transit (ICT) regulation, which amends the existing Fleet Rule for Transit Agencies. The City of Vista supports efforts that reflect a positive, collective, and cohesive approach to regional solutions, as long as local control is maintained.

The North County Transit District (NCTD) is the public transit operator for north San Diego County. NCTD operates a multimodal transit system that includes: fixed route buses, demand response, complementary ADA paratransit, commuter rail, and hybrid rail. NCTD's fixed route revenue fleet is composed of one hundred thirty-three (133) full-size compressed natural gas buses, nine (9) diesel buses and ten (10) smaller buses powered by unleaded gas.

Over the last two years, NCTD has made significant strides toward adding zero emission technology to its fleet. Key actions include: the execution of a non-binding agreement with San Diego Gas and Electric to provide electric bus charging infrastructure, programming low carbon transit operations funds to support the purchase of zero emission buses, successfully receiving a Federal Transit Administration grant award to support the purchase of zero emission buses, and procuring a consultant to develop a capital improvement plan to convert its facilities to support zero emission bus operations. These efforts clearly demonstrate NCTD's commitment to exploring this new technology.

Chair Nichols  
California Air Resources Board  
August 13, 2018  
Page 2

Submitted via email to: Evan Kersnar, [Evan.Kersnar@arb.ca.gov](mailto:Evan.Kersnar@arb.ca.gov)

RE: Proposed Innovative Clean Transit (ICT) Regulation

However, NCTD, like most transit systems, have significantly under-funded capital programs. For example, NCTD has 98 revenue vehicles that support its rubber wheel operations that have reached the end of their useful life and require replacement. The estimated cost to replace these 98 buses with compressed natural gas and gasoline technology is over \$51 million. Additionally, NCTD has critical unfunded safety project needs of \$171 million for rail bridge replacements and \$82 million for bluff stabilization in Del Mar. The cost to procure electric buses and convert NCTD facilities will significantly add to the capital improvement program deficit that already exists.

For these reasons, we oppose the adoption of any strict regulatory mandate. Instead, we believe that agencies, such as NCTD, should be allowed to conduct pilot tests of zero emission technology over the next 5 to 10 years. Based on the success of these pilot tests, NCTD will be able to develop capital plans that support a phased implementation of zero implementation technology that will allow us to succeed. This approach also assumes that the State of California allocates additional funding to support increased capital and operating costs until such time that the costs approximate current costs for operating using compressed natural gas. Our proposed approach supports our shared interests of improving transportation efficiency while supporting the financial health of our transit operator.

Thank you for considering our feedback prior to creating new mandates that would impact our local transportation provider, NCTD.

Sincerely,



John J. Aguilera  
Deputy Mayor