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Via Email

RE: Oppose - Innovative Clean Transit (ICT) Proposed Rule

Dear Madams,

The City of Glendale appreciates the California Air Resources Board (CARB) effort to meet air quality, climate, and public health protection goals. Glendale has and continues to do its part for clean air. Glendale's fleet is 100% CNG and bus purchases include near zero emission CNG engines and will convert to zero emission CNG engines when they become commercially available.

Glendale opposes the ICT rule as it is currently proposed for small transit agencies. Other than the designation of large or small fleet and the related timing for implementation, the proposed rule assumes that all transit agencies are otherwise the same. That is not the case for Glendale's transit system that has extremely limited resources that would prohibit the deployment of Zero Emission Bus (ZEB) technology in the near future.

Glendale's specific concerns regarding the proposed rule are:

- A. Potential ICT creates an unfunded mandate
 - Glendale is a locally funded transit system for which there are limited financial resources.
 - Glendale does not receive formula allocation of Federal 5307 capital funds.
 - Glendale does not receive allocations of State TDA, STA, SB1 funds.
 - Glendale is not able to obtain funds as a disadvantaged community (LCTOP, TIRCP).
- B. Current obligations for CNG under CARB 2002 fleet rule
 - Glendale invested heavily in developing the CNG fueling infrastructure which will not meet its useful life until 2035.
 - Current contract for CNG fuel requires monthly minimum purchase requirement based on a 34 bus fleet which is in effect until 2030.

- C. Unforeseen consequences reduces transit trips
- Current funding for Glendale's transit operations is static with no new funding sources identified for future transit expansion.
 - Any increase in capital cost and additional operating cost for ZEB deployment will directly reduce current level of transit services – will require reduced hours of operation and potentially eliminate routes.
- E. ZEB ranges and reliability promised by manufacturers have not been achieved in day to day operations.
- Current ranges would require additional infrastructure to perform in route charging adding considerable capital cost.
 - In route charging locations would be difficult to site and require cooperation and approval of other agencies.
 - Strong potential to incur additional capital costs for additional buses to meet service existing requirements.
- F. Increased "fueling" costs
- There is an unknown cost to assess the local utilities' current power grid to accommodate powering the transit fleet.
 - There is potential capital cost to revamp of the existing power grid for BEB for which capital infrastructure costs are daunting.
 - Glendale would be paying the regular commercial tariff rate for electricity which is more expensive than our CNG fueling at \$1.67/GGE.
- G. For Glendale, ZEB deployment will reduce operational flexibility and violate longstanding FTA regulations.
- Currently, if a bus needs maintenance it can be exchanged with any other bus in the fleet. The ZEB vehicle can only be deployed to a ZEB enabled route.
 - Restrictions to ZEB bus deployment may violate FTA regulations by requiring increased spare ratio of vehicles and create inequity by inability to deploy vehicles among all routes.
- H. Lack of standards among ZEB manufacturers
- There is no common vehicle design for ZEBs among manufacturers which prevents competitive bidding and does nothing to encourage cost containment and affordability.
 - Lack of charging design standards means that once a vehicle manufacturer is chosen the agency is stuck having to purchase future vehicles from the same manufacturer, regardless of cost or performance.
 - There is no common design for charging infrastructure to support the bus deployment meaning that transit agencies have no ability to share charging infrastructure.
 - Impossible to have a truly open bid process.

Some small transit agencies like Glendale limit risk and expense by depending on and learning from the large transit agencies that have had ample opportunity to vet new technology. It is too soon to implement the regulation statewide for all size or types of transit agencies as CARB is unable to obtain an accurate and complete picture of transit agencies' current experience with ZEBs and initial review of technology readiness. Currently large agencies that are attempting to deploy ZEB's, are experiencing difficulty in having operable and reliable vehicles delivered, have experienced high costs of charging infrastructure in very limited applications, and have far exceeded estimated operating expenses for utility costs. Glendale does not have the capacity to experiment.

Local transit agencies such as **Glendale should be exempt** from any ZEB based CARB regulation until the requirement is found to be technologically or economically feasible or when funding programs are available to fully fund the cost to make the transition from CNG to ZEB.

Yours truly,

Kathryn Engel
Transit Manager