



MORONGO BASIN TRANSIT AUTHORITY

July 20, 2018

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

Dear Ms. Chair Nichols and CARB Board Members,

The Morongo Basin Transit Authority (MBTA) is a Joint Powers Authority providing transit service in the high desert area of San Bernardino County. Operating just under 30 buses, we are a truly rural small operation that meets the challenge of providing lifeline services for the cities of Twentynine Palms, Yucca Valley and the outlying areas surrounding the Joshua Tree National Park.

MBTA has engaged ARB staff expressing our concerns about the potential adverse effects of the proposed implementation of the Innovative Clean Transit (ICT) regulation on small operators such as MBTA.

Specifically-we have noted that while the currently proposed regulation excludes “cutaway” type vehicles until 2026, its scope refers to all buses with a Gross Vehicle Weight rating of over 14,000 lbs., except for trolley buses. For greater clarity, we propose that ARB be explicit in similarly exempting all “body and frame” type buses (cutaways) regardless of weight class. Rural agencies such as MBTA rely heavily on larger cutaway buses as a cost effective solution for providing fixed route services in our communities, not just for providing door to door services. In particular, the F-550 based cutaways weighing 19,500 lbs. are the backbone of our fleet. The 14,000 lb. threshold, if implemented, would place the type of vehicles we utilize under the scope of the regulation. Cutaways should not be counted towards fleet size due to lack of availability, field testing and the unknown performance of these type of shuttles for agencies like ours serving vulnerable populations.

We look forward to continued discussions with ARB on these matters going forward.

Sincerely,

Mark Goodale
General Manager