



July 21, 2018

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Innovative Clean Transit Regulation Concept

On behalf of the Pomona Valley Transportation Authority, I submit the following comments regarding the Innovative Clean Transit Regulation Concept (ICT). Pomona Valley Transportation Authority (PVTA) is a joint powers authority established by the cities of Claremont, La Verne, Pomona and San Dimas to provide specialized transportation to residents, such as, seniors and the individuals with disabilities, whose transportation needs are not met by the existing transportation network. We appreciate the open approach taken by ARB staff in the developing the ICT and for the opportunity to provide input.

Exclusion of Cutaway Buses

PVTA as a small specialized transportation provider strongly supports the concept paper's exclusion of cutaway buses from the regulation. There is no commercially available ZEB alternative for these smaller vehicles that are typically used in paratransit and rural service. These vehicles cost from \$75,000 to \$100,000, considerably less than a heavy duty bus. They have a significantly shorter useful life, 5 to 7 years compared to 12 to 15 years. This makes the relative increase in life cycle costs of converting to zero emission vehicles significantly larger.

Exempt Paratransit and Social Service Transportation Providers

The proposed ICT regulation, as currently proposed would have a significant detrimental impact on paratransit and social service transportation providers, such as, PVTA. PVTA like most paratransit and social service agencies does not own a transit facility. Unlike many of the larger fixed route operators in our county, PVTA does not have access to federal funding

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resources that are most often utilized to acquire transit maintenance facilities. PVTA contracts with private operators to provide its services. These contractors generally lease a facility for the 3 to 5 year term of the transportation agreement. Finding an appropriate facility using conventional vehicles is already a major challenge for our contractors. Because of the obstacles our contractors encountered establishing a location in the Pomona Valley, both of our providers are forced to locate their facilities in a neighboring county.

The facility requirements imposed by the proposed regulation would make finding a location and providing the required infrastructure in order operate and maintain zero emission vehicles extremely difficult and significantly increase the costs to agencies like ours. These added costs would require PVTA to reduce services to seniors and individuals with disabilities. Many small paratransit and social service providers like PVTA are not recipients of either FTA 5307 or FTA 5311 federal capital funds. This means that the additional costs associated with converting to a ZEB compliant infrastructure will come directly from monies needed to fund their operations.

Please contact me at 909-596-7664 or glspvta@gmail.com if you have any questions or comments about PVTA's comments on the ICT proposal.

Sincerely,



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