



September 21, 2018

Ms. Mary Nichols, Chair  
California Air Resources Board  
P.O. Box 2815 1001 "I" Street  
Sacramento, CA 95814

**Riverside Transit Agency**

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cc: Clerk of the Board – For Board Distribution

Re: Innovative Clean Transit Regulation Public Hearing

Dear Chair Nichols:

On behalf of the Riverside Transit Agency (RTA), we hereby submit comments in response to the Innovative Clean Transit (ICT) Regulation staff report, dated August 7, 2018.

RTA has a fleet comprised of 334 buses, 163 of which are Compressed Natural Gas (CNG), which traveled 16.2 million miles and provided 8.6 million rides in 2017. Our goal is to provide our customers safe, reliable, courteous, accessible, and user-friendly services. We are also increasingly aware that we must all do our part to address the local air quality issues our state has set as public priority. While the ICT is clear in its objective to address the state's goals, we submit the following concerns which highlight that the program must be balanced with our local operational realities and constraints.

#### Cost

The enactment of the ICT regulation would force RTA to incur millions of dollars of unexpected costs to buy zero-emission buses (ZEBs), retrofit and upgrade our facilities, train our workforce on a new and unfamiliar technology, and install charging infrastructure. While there are incentives that might help defray some or those costs, RTA would undoubtedly be responsible for significant costs to provide an acceptable level of service. Further, the proposed ICT would remove certain incentives that would help RTA achieve a level of compliance once the rule is determined.

Without an existing source of money to make these purchases, our agency would be forced to redirect existing funding currently used for revenue service. This would most likely result in reduced service levels in Riverside County, taking buses off the roads and providing less incentive for residents to leave their cars at home and take public transit. The net result could mean more cars on the roads emitting additional pollutants into our air. This is in direct conflict with one of the main goals CARB has identified for the ICT, which is to "support the near-term deployment of zero-emission buses where the economics are viable and where transit service can be maintained or expanded."

In addition, RTA has experienced significant savings by operating a CNG fleet. We have been able to take advantage of various programs that reward transit agencies for the use of alternative fuels. In fact, to date, RTA has received over \$9 million in revenue from the federal government's Alternative Fuels Excise Tax Credit, over \$1.9 million from California's Low Carbon Fuel Standards program, and over \$1.5 million in Renewable Identification Numbers (RINs) revenue under the federal Renewable Fuel Standard Program.

These revenues are reinvested into RTA's system and allow us to put more buses on more roads more frequently. Losing these revenues because of a shift in fuels sources would again result in less bus service, more car usage and more air pollution.

#### Technology Mandate

If the goal of the ICT is to address environmental goals, CARB should identify a "clean" target of emissions and allow each transit agency the flexibility to achieve that target as quickly and as efficiently as possible. Directing all agencies to move to ZEBs without attention to the wide variety of services we each provide misses the point. All agencies have specific characteristics that make our service areas unique. Given the different terrain of each service area – in distance, service frequency, and geography - presenting a "one technology fits all" approach is neither practical nor likely to yield maximum emission savings.

Instead, we believe a rule based on a performance standard is optimal, allowing transit fleets to deploy advanced clean technologies that address state environmental needs while providing transit agencies operational flexibility and choice. That flexibility not only allows multiple technologies to move toward cleaner transit services, but it also avoids the over-dependence on one technology which could prove problematic.

#### Cutaway buses

An especially problematic clause of the ICT regulation would implement a purchase mandate on smaller, cutaway buses beginning in 2026. Battery-electric cutaway buses are an emerging technology and, to the best of our knowledge, have not yet been approved for purchase with federal funding. Cutaway buses are critical to RTA for providing service in low-density rural areas and to persons who qualify for paratransit service under the Americans with Disabilities Act. Additionally, unlike fixed route operations, the Federal Transit Administration regulates the paratransit operating environment providing explicit requirements for pick up windows, denial of service as well as acceptable travel times. In the dynamic operating environment of paratransit services these unproven new buses could result in unintended violations of ADA law.

Overall, RTA is supportive of the environmental goals CARB seeks to achieve. We are also focused on providing our customers with the best transit service at an affordable price. We are constantly reviewing data, assessing possibilities and pursuing opportunities to achieve both state and local goals. We urge CARB to adjust the ICT rule to allow local transit agencies the flexibility to achieve both and look forward to working with you to reach that balance.

Sincerely,



Larry Rubio  
Chief Executive Officer

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