



Ventura County Transportation Commission

September 24, 2018

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

RE: Innovative Clean Transit Regulation

Dear Chair Nichols:

On behalf of the Ventura County Transportation Commission (VCTC), I am writing to request your agency exercise caution in applying the proposed Innovative Clean Transit Regulation to over-the-road motor coaches. VCTC operates a transit system consisting of 32 over-the-road coaches providing key transit connections between the cities of Ventura County and to locations in neighboring Santa Barbara and Los Angeles Counties. The attractiveness of this system to continue attracting ridership is dependent upon the continued ability to obtain over-the-road coaches that can reliably operate in the Ventura County environment including negotiation of significant grades at freeway speeds. In addition, due to the large number of bicycles used to access the service, it is routinely necessary to utilize both front-mounted bicycle racks as well as the lower cargo area found on motor coaches. In the event that use of electric bus technology precludes the availability of the cargo compartments, the result would be a reduction in the number of riders who can use bicycles to access VCTC's system, thus creating a negative air quality impact.

Although the current version of the Innovative Clean Transit Regulation provides that the regulation not become effective until there is an electric over-the-road motor coach approved by the FTA Altoona Test Center, a more substantive analysis is needed to ensure the motor coaches can meet the various agencies' operational needs including those mentioned above. Therefore, VCTC requests that the over-the-road coaches not be included in the regulation until a more thorough technology assessment can be completed.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. M. Kettle", is written over a horizontal line.

Darren M. Kettle
Executive Director