

Alan Abbs

18-7-6



South Coast
Air Quality Management District

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Office of the Executive Officer
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September 28, 2018

CARB Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed Innovative Clean Transit Regulation

Dear Honorable Board Members:

Thank you for the opportunity to comment on CARB's Proposed Innovative Clean Transit (ICT) Regulation. SCAQMD staff appreciates the hard work that CARB staff have put into developing this proposal. The proposed regulation would implement one of the key measures of CARB's 2016 SIP Strategy. I urge the CARB Board to adopt the proposed regulation and would like to offer the following points in support of the proposed regulation.

Transition to zero and near-zero-emission technologies is absolutely essential for the South Coast Air Basin to meet the federal 8-hour ozone standards. Based on our 2016 AQMP, NOx emissions have to be reduced by 45% and 55% beyond all existing regulations by 2023 and 2031 respectively, in order to meet these standards. Needless to say that this is daunting challenge for this region.

The proposed ICT Regulation is an important step in commercialization of zero-emission technologies for both heavy duty and medium duty vehicles. These vehicles are projected to account for 27% of NOx emissions in the South Coast Air Basin in 2023. Transit buses are prime candidates for deployment of zero-emission technologies because they are captive fleets operating mostly in urban areas with a low-speed operating cycle. The proposed ICT regulation would achieve much-needed NOx and PM2.5 emission reductions as well as help to reach State's GHG reduction goals.

The vast majority of transit buses in the South Coast Air Basin currently operate on CNG with several transit agencies committing to 100% zero-emission buses by 2030. While zero-emission bus purchase requirements would result in significant long-term reductions, we still need more immediate reductions. The proposed low-NOx engine purchase and renewable fuel requirements that would start in 2020 would ensure that additional NOx reductions will be achieved in the interim years while transit agencies are transitioning to 100% zero-emission buses.

The proposed ICT regulation would further send a strong market signal for zero-emission technologies as well as for certified low-NOx engine technologies. These technologies are advancing rapidly but continuous improvements in technology and fueling infrastructure along with enabling incentive funding would ensure that these become widely available even sooner than current projections. Further technology development and deployment of zero-emission technologies in transit buses would also facilitate the implementation of these technologies in other heavy-duty vehicle applications such as drayage and delivery trucks.

For the above reasons, SCAQMD staff strongly supports the adoption of the Proposed ICT Regulation. We also urge CARB to proceed expeditiously in developing and adopting CARB's remaining defined strategies and undefined strategies (*i.e.*, Further Deployment of Cleaner Technologies) in the 2016 AQMP. Achieving the emission reduction commitments associated with these strategies would ensure timely attainment of the 8-hour ozone standards. SCAQMD is fully committed to work collaboratively with CARB staff to that end.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Natri", written in a cursive style.

Wayne Natri
Executive Officer