



November 21, 2018

Chair Nichols & Members of the Board  
California Air Resources Board  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95812-2815

**Re: Support for Innovative Clean Transit Rule**

Dear Chair Nichols and Members of the Board:

On behalf of the undersigned organizations, we submit comments on the final Innovative Clean Transit Rule. We are disappointed in some of the changes that were made to the final rule between the time when the Board heard this item in September and now. We felt the prior version of the rule was truly a compromise, but we still supported it. Even with this disappointment, we recognize that California must finalize this rule. We are already a full year behind the deadline set in the Mobile Source Strategy to finalize and adopt this rule. Thus, even as a rule that transit agencies and others have requested and succeeded in changing significantly, the rule serves as a necessary regulatory backbone to get us to a zero-emission transit bus future.

Each month marks more good news for electric buses. Costs are going down, and more and more of these buses are being deployed in California. Furthermore, with the right jobs policies in place, the transition to electric buses can create many high quality careers and electrical apprenticeship training opportunities in charging infrastructure installation and vehicle manufacturing for communities facing significant barriers to employment. But, we need the backbone of a strong regulation to ensure the current progress in deployments of zero-emission buses continues. While each of our organizations have places where we believe the proposed regulation could be strengthened, the need to adopt a rule as expeditiously as possible outweighs

the needs to fix every single part of this regulation. Overall, this rule provides a compromise where staff earnestly addressed the myriad concerns of transit agencies – some warranted, some not – while ensuring environmental, health, and community groups receive the promise of marching towards a truly zero-emission transit bus future.

Passing this regulation represents the single best incentive California can pursue to push zero-emission buses. The proposal will send a strong market signal, and as transit agencies continue their transition at an accelerating rate, bus costs will continue to come down, range and utility will continue to increase, and transit agencies will experience the cost-effective operation inherent in zero-emission busses. California can once again demonstrate to other states how new emission-reduction programs can help clean up our air and atmosphere while also enhancing our economies.

We appreciate your consideration of these comments, and we look forward to celebrating the passage of this important regulation.

Sincerely,

A handwritten signature in black ink that reads "Adriano L. Martinez". The signature is fluid and cursive, with the first name "Adriano" and last name "Martinez" clearly legible.

Adriano L. Martinez  
Earthjustice

Kathryn Phillips  
Ray Pingle  
Sierra Club California

Eddie Ahn  
Brightline Defense

Bill Magavern  
Coalition for Clean Air

Dan Jacobson  
Environment California

Micah Mitrosky  
IBEW Local 569

Abhilasha Bhola  
Jobs to Move America

Jimmy O'Dea  
Union of Concerned Scientists

JB Tengco

BlueGreen Alliance

Jen Kropke

IBEW Local 11 and NECA Los Angeles, Labor Management Cooperation Committee