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Science for a Healthy Planet and Safer World

April 17, 2018

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Chairwoman Brinkman, Directors, and General Manager Reiskin

This letter is submitted on behalf of the undersigned organizations and individuals to share our concerns regarding how off-track the San Francisco Municipal Transportation Agency (Muni) is in its stated commitment to converting its fleet to 100 percent zero-emission buses by 2020.¹ Muni is already behind both major and smaller transit agencies across California that have made similar commitments to a zero-emission future. The lack of progress toward this commitment is not just symbolic. Muni's failure hurts transit riders and residents by delaying important air quality benefits as well as foregoing access to important funding sources for zero-emission infrastructure that are being allocated to advanced transit agencies today.

Muni must recommit to its zero-emission goals with the following three steps:

1. **Immediately commence a pilot program** to assess battery-electric bus technologies based on the grant proposal recently rejected by the Federal Transportation Authority.
2. **Include zero-emission procurement targets in the upcoming 30' replacement procurement** and in all future procurements.
3. **Prepare a plan for MTA Commission and Board of Supervisors approval** outlining how Muni will transition its fleet to 100 percent zero-emission buses as quickly as possible as envisioned by its 2004 Clean Air Plan.

In 2004, Muni boldly announced its goal “to be the first major transit agency in the world to operate a 100 percent zero-emission fleet by the year 2020.” Yet to date, Muni has not purchased a single battery or fuel cell electric bus to start replacing its polluting diesel fleet. In its 2004 “Clean Air Plan – Zero Emissions 2020,” Muni committed that *57% of the bus fleet would be zero-emission or hybrids by 2015*, and that it would be planning for *procurement of over 300 zero-emission buses in the 2016-17 procurement phase*. Muni continued to reference these goals in its draft 2009 Climate Action Plan and

¹ <https://archives.sfmta.com/cms/cmta/documents/4-19-11Item13CASmemoaccessible.pdf>

2011 Departmental Climate Action Plan. But since then Muni has done little to nothing to achieve those goals. Muni continues to replace diesel buses with more diesel buses, has no plan for meeting its procurement targets for zero-emission buses let alone its 2020 goal of 100 percent zero-emission buses.

This failure cannot be blamed on the readiness of battery-electric buses. As of September of 2017, 107 battery-electric and fuel cell buses were operating in over 20 transit fleets across California, with another 340 such buses on order or awarded. Based on their experiences, seven transit agencies representing almost one-third of all buses in California have committed to making a full transition to zero-emission buses. There are now multiple zero-emission bus models commercially available from multiple manufacturers. Ranges have steadily increased with several models capable of 200 to 300 miles on a single charge. Complaints about readiness simply do not reflect the advancements in current technologies.

Cost complaints are similarly unfounded. Muni continues to invest in the most expensive hybrid bus technologies, while fully battery-electric bus costs have trended down for years. A recent battery-electric bus procurement by LA Metro of zero-emission buses was comparable to the purchase price for natural gas buses without accounting for incentives from the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Program (HVIP).² The California Air Resources Board (CARB) has shown that even with higher upfront capital costs, the total cost of ownership for battery-electric buses is now comparable if not lower than for any other type of bus.³

Since 2011, Muni has gone from leader to laggard in its commitment to transitioning its fleet to 100 percent zero-emission buses. This reversal threatens the health and well-being of San Francisco residents. The health impacts of diesel particulate matter are well-known and the risks associated with exposures have only increased as scientists learn more. Thus, while Muni has made strides to replace older diesel buses, its strategy of replacing them with new diesel buses continues to leave communities exposed to pollution levels that pose unacceptable risks.

Muni's failure to pursue its zero-emission strategy now leaves the agency playing catch-up. CARB is considering a rule that would require all transit agencies to transition to 100 percent zero-emission buses by 2040. To achieve that goal, CARB's rule would include escalating purchase requirements that would mandate certain percentages of all new purchases be zero-emission buses. By the 2027-2029 timeframe, all new bus purchases would need to be zero-emission buses in order to fully transition to zero-emission fleets by 2040. CARB is considering starting these mandates in the early 2020's.

Transit agencies that purchase zero-emission buses now will likely get credits that can be used toward future mandates and can take advantage of voluntary incentive programs that may not be available once the purchase requirements become mandatory. Funding through the HVIP is currently available not only to offset the purchase price of zero-emission buses, but also for charging station installation. In addition, investor-owned utilities, such as Pacific Gas & Electric, have filed applications with the Public Utilities Commission for permission to install and pay for make-ready charging infrastructure for electric bus and other transportation electrification projects. But these pools of funding are limited and will only be available to those agencies with demonstrated zero-emission bus procurement plans.

² Contracts for Sixty zero-emission 40' buses (<https://boardagendas.metro.net/board-report/2017-0304>) and 295 40' CNG transit bus contract (<https://boardagendas.metro.net/board-report/2016-0988/>)

³ CARB. Fifth Innovative Clean Transit Workgroup Meeting. June 26, 2017. https://arb.ca.gov/msprog/ict/meeting/mt170626/170626_wg_pres.pdf

In summary, SFMTA must pivot aggressively to zero-emission bus technology even just to meet the unacceptably distant target of a 2040 zero-emissions fleet. We believe San Francisco should not wait to be forced into this action by the state, losing environmental benefits and funding opportunities along the way. We believe San Francisco must beat the state deadline and get this done by 2030 if feasible, a full decade behind SFMTA's original commitment. This will require immediate and decisive action, a real plan, and political leadership. The groups and individuals signed below stand ready to help Muni take the required actions to achieve these goals, and are happy to meet with your staff to discuss these matters further.

Sincerely,

Eddie Ahn, Executive Director
Brightline Defense Network

Bradley Angel, Executive Director
GreenAction

Paul Cort, Staff Attorney
Earthjustice

Alex Lantsberg, Director of Research and Advocacy
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