

CITY OF LOS ANGELES
CALIFORNIA

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April 2, 2018

California Air Resources Board
1001 "I" Street
Sacramento, California 95814

Subject: CITY OF LOS ANGELES DEPARTMENT OF TRANSPORTATION COMMENTS ON CALIFORNIA AIR RESOURCES BOARD VOLKSWAGEN ENVIRONMENTAL MITIGATION TRUST FOR CALIFORNIA

The California Air Resource Board released a draft Beneficiary Mitigation Plan for California's Allocation of the Volkswagen Environmental Mitigation Trust. The City of Los Angeles Department of Transportation (LADOT) Transit would like to provide comments regarding the Environmental Mitigation Trust Plan.

LADOT Transit is the largest Municipal Operator in Los Angeles County with a fleet of 356 buses. LADOT provides commuter services (Commuter Express), local circulator services (DASH) and paratransit service (Cityride). LADOT Transit is required to begin purchasing all battery-electric buses in 2019 in order to meet the City's mandate to have a fully electric fleet by 2030.

At this time, the current state Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) program is a critical funding source in deploying battery-electric buses since the current cost differential between a CNG and a battery-electric buses is over \$240,000, and the need for subsidies is essential.

Please consider the following under the Category of Transit, School and Shuttle Buses:

1. LADOT Transit requests that funding be an eligible expense. The need for funding for corresponding infrastructure (power upgrades, transformers, and chargers) is proving to be a barrier for transit agencies to deploy battery-electric buses.
2. We would like to ensure that there is no limit on the number of buses an agency may request from the Environmental Mitigation Plan. Currently the HVIP program has a limit of 100 buses for the full voucher and a lower voucher amount for buses over 100. We request that all buses receive the same amount of funding. Such limits are harmful to large transit agencies and penalize their riders.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink that reads "Corinne Ralph". The signature is written in a cursive, flowing style.

Corinne Ralph
Chief of Transit Programs, LADOT