



1255 East Street, Suite 202 • Redding, CA 96001 • (530)262-6190 • Fax: (530)262-6189
E-mail: srta@srta.ca.gov • Website: www.srta.ca.gov

Daniel S. Little, AICP, Executive Director

April 18, 2018

Lisa Williams
Air Pollution Specialist
California Air Resources Board, Mailstop 5B
P.O. Box 2815
Sacramento, CA 95812-2815

Subject: Comments Regarding the VW Environmental Mitigation Trust

Ms. Lisa Williams:

The Shasta Regional Transportation Agency (SRTA) appreciates the opportunity to comment on the Volkswagen (VW) Environmental Mitigation Trust Program and the current Discussion Document that the California Air Resources Board (CARB) has provided for public review and comment. SRTA, as the designated metropolitan planning organization (MPO) for the Shasta Region, is responsible for administering state and federal funding for the planning, construction, operation, and maintenance of transportation projects throughout Shasta County. SRTA is also responsible for implementation of a Sustainable Communities Strategy, as part of the Regional Transportation Plan, which seeks to achieve regional greenhouse gas reduction targets by 2020 and 2035 as required under Senate Bill 375.

SRTA provides the following overall comments with regard to the Discussion Document:

- **Ensure investments are made across all regions** – NOx emissions impact all regions and are not confined by boundaries. SRTA supports CARB's effort to provide investments across all regions of California and encourages CARB to take a proactive approach to this to ensure funds are available for all regions.

One suggestion is for CARB to provide a minimum amount of funds for each air quality basin for the first few years of the program. This encourages participation across California and gives assurance to businesses, agencies, tribes, and school districts in rural and small-urban communities that their applications can compete with those in larger urban regions. For example, CARB could establish a combined minimum of 10% from all five mitigation categories be made available to counties with less than 250,000 population. Funds could be guaranteed to be available for up to four years, with un-requested funds being put back into the statewide program available for anyone after the guaranteed period.

- **Maintain the Low-Income Communities eligibility for mitigation categories** – SRTA encourages CARB to keep the low-income communities eligibility criteria for funding categories that have minimum investment criteria. Based on experience with state programs that limit funding eligibility to only disadvantaged communities, as defined by CalEnviroScreen, the vast majority of California's rural and

small-urban communities would remain ineligible for funding. This does not support the intent of this program to mitigate NOx emissions across the entire state or CARB's stated guiding principles of the mitigation trust.

SRTA provides the following comments regarding specific mitigation trust categories:

- **Transit, School, and Shuttle Buses**

Increase battery electric transit bus and battery electric shuttle bus maximum incentives – Battery-electric vehicles continue to maintain a high price tag over conventional fuel vehicles. Many vehicles average \$750,000-\$1,000,000, and CARB's proposed funding maximum (up to \$180,000 for a new battery electric transit bus and up to \$100,000 for a new battery electric shuttle bus) would not provide a substantive amount of funding to help procure vehicles. SRTA appreciates CARB's attempts to maximize the benefit of this program to reduce NOx; however SRTA suggests that the program provide at least 25-30% more funding than is currently proposed in order to help applicants successfully procure vehicles.

- **Freight Vehicles**

Freight trucks are discussed in the Class 8 Freight and Port Drayage Trucks, Zero-Emissions Freight/Marine, and Combustion Freight/Marine mitigation trust categories.

The Shasta region includes several major transportation and freight movement corridors. A consolidated goods and freight hub was identified in SRTA's Regional Transportation Plan (2015) as being a key component to reduction of greenhouse gas emissions and compliance with SRTA's Sustainable Communities Strategy. SRTA appreciates CARB's efforts to support greenhouse gas emissions reduction by incentivizing replacement of outdated freight vehicles with zero-emissions freight vehicles. Replacement of outdated freight vehicles with zero-emissions freight vehicles is in accordance with SRTA's Sustainable Communities Strategy.

- **Lighty-Duty ZEV Infrastructure**

SRTA appreciates CARB's efforts to provide support for implementation of light-duty ZEV infrastructure. Expansion of the existing ZEV infrastructure was identified in SRTA's Regional Transportation Plan (2015) as being a key component to reduction of greenhouse gas emissions and compliance with SRTA's Sustainable Communities Strategy.

If you have any questions regarding our comments please contact Senior Transportation Planner Sean Tiedgen at (530) 262-6185 or stiedgen@srta.ca.gov.

Regards,



Daniel S. Little, AICP, Executive Director

DSL/SMT/JNM

C: Lowell Watros, REU