

November 06, 2023

The Honorable Liane Randolph
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95811

RE: Fiscal Year 2023-24 CARB Funding Plan for Clean Transportation Incentives

Chair Randolph:

On behalf of the California Transit Association, I write to you today to voice our support for the California Air Resource Board's FY 2023-24 Funding Plan for Clean Transportation Incentives. The Association has a membership base of more than 220 organizations, inclusive of 85 transit and rail agency members and all leading original equipment manufacturers, and we have been a key supporter and facilitator of advancing funding to further assist transit agencies as they continue to transition to zero-emission vehicles and supporting infrastructure and technology.

In writing to you today, the Association wishes to communicate our support for CARB staff's proposal to increase the annual limit on voucher requests for public transit agencies. Currently, when procuring zero-emission buses using funds from the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP), California transit agencies are allotted up to 30 voucher requests per year. Under the proposed changes to the FY 2023-24 Funding Plan, California transit agencies would be granted up to 50 voucher requests annually, nearly doubling the current number of allowable requests. With our member agencies working diligently to meet state climate objectives and adhere to deadlines set by the Innovative Clean Transit Regulation, the additional voucher allowance is not only majorly beneficial, but also crucial in helping move the industry towards fully zero-emission technologies at an accelerated rate.

Consistent with our advocacy in response to the Innovative Clean Transit Regulation, we also encourage CARB to increase HVIP voucher incentive amounts to levels equal to those established for VW Mitigation Trust – Appendix D vouchers. With many of our member agencies reporting challenges in purchasing zero-emission buses due to prohibitive procurement costs, the proposed additional voucher requests and parity in incentive amounts would provide significant support in addressing existing financial barriers that currently prevent agencies from growing their zero-emission fleet. Additionally, with the significant cost savings that agencies would see with these

allowances, agencies could then prioritize obtaining the necessary charging and refueling infrastructure to accommodate the newly procured buses, further supplementing agency operations and simultaneously supporting state climate and transportation goals.

As we move these recommendations to you this year, we also wish to elevate the continued importance of state funding to support the transition to zero-emission vehicles, across all transit modes. We understand that, due to state budget challenges, the FY 2023-24 Funding Plan does not include new funding for HVIP or new funding to support compliance with the In-Use Locomotive Regulation and Commercial Harborcraft Regulation. In the year's ahead, we strongly encourage CARB to continue to communicate the importance of funding for these purposes to the Administration and Legislature.

The Association greatly appreciates this opportunity to comment on the FY 2023-24 Funding Plan for Clean Transportation Incentives and looks forward to continuing to partner with CARB to advance our shared environmental and fleet deployment goals.

If you have any questions regarding our comments, please contact me at michael@caltransit.org or (916)-446-4656 x1034.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Pimentel". The signature is fluid and cursive, with the first name being more prominent.

Michael Pimentel
Executive Director