

April 10, 2016

Mary D. Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: 2017 Climate Change Scoping Plan Update – the Proposed Strategy for Achieving California’s 2030 Greenhouse Gas Target

Chair Mary Nichols:

On behalf of the California Transit Association, I would like to thank you for the opportunity to comment on the California Air Resources Board’s (ARB) 2017 Climate Change Scoping Plan Update. The Association represents more than 200 transit-affiliated entities in California, including transit agencies, original equipment manufacturers, transit-support groups and part suppliers. Taken together, our members provide the vast majority of the 1.44 billion unlinked transit trips taken in California annually, and drive innovation in the heavy-duty vehicle sector that reduces greenhouse gas (GHG) emissions and improves air quality. I write to you today, acknowledging California’s stated commitment to a more sustainable transportation network, to emphasize the importance of continuing and expanding the state’s investment in public transit. As you know, the California Transportation Plan 2040 – the Brown Administration’s long-range policy framework for meeting our future mobility needs and reducing GHG emissions – identifies significant new investment in public transit as indispensable to meeting our 2030 and 2050 GHG emissions targets.

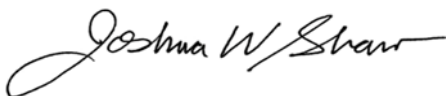
Throughout the development of the 2017 Scoping Plan, ARB staff recommended that the state further support transit as an alternative to single-occupant vehicle travel by investing in transit projects that expand capacity, increase service levels, and improve accessibility and reliability for the traveling public. The document before you today solidifies these recommendations by highlighting the benefits of existing measures that strengthen transit, while alluding to new measures that ARB could pursue to deploy zero-emission vehicles across vehicle classes, accelerate affordable transit-oriented and infill development, expand access to transit, reduce commute trips and maximize the use of alternatives to the automobile. We believe strongly that should these measures be implemented, with input from the transit industry, they will build on the successes of existing transit-supporting Greenhouse Gas Reduction Fund programs like the Transit and Intercity Rail Capital, Low Carbon Transit Operations and Low Carbon Transportation programs. Together, these programs have reduced GHG emissions, driven the maturation of the heavy-duty vehicle sector and supported investment in disadvantaged communities. In the years ahead, the Association will continue to advocate for additional investment in the TIRCP, LCTOP and Low Carbon Transportation program, and we welcome the opportunity to work with ARB to promote innovations that result in the transformational changes in travel behavior envisioned by this document.

Additionally, we are pleased that the 2017 Scoping Plan champions new measures to “stabilize transportation funding so investments are available to develop sustainable and well-maintained multi-modal transportation networks in California.” As you may know, California made significant progress toward this goal with the passage of SB 1 (Beall and Frazier), a \$52.4 billion transportation funding package that will invest \$7.5 billion in public transit over the next ten years. While the passage of this bill is a monumental win for transit riders across the state, there is still much work to be done to ensure that California’s \$39 billion in unmet funding needs are fully addressed. For its part, the Association will continue to advocate for additional state and federal funding to support public transit and we urge ARB’s continued support of these efforts.

Finally, while there is much in the 2017 Scoping Plan that we support, we have significant concerns with the continued identification – without qualification – of the Advanced Clean Transit (ACT) regulation as a component of ARB’s Mobile Source Strategy. As you know, the Association is working closely with ARB staff to develop a consensus cost model for this proposed regulation and continues to engage with ARB staff on the development of alternative performance-based regulation that would provide flexibility to transit agencies to pursue only economically or operationally feasible near-zero and zero-emission vehicle technologies. These steps, which have been ongoing for more two years, would suggest that the ACT regulation is still evolving or under review, yet the language included in this document is precise, suggesting that “20 percent of new urban buses purchased beginning in 2018 will be zero emission buses, ramping up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOx standard.” We believe that this language ignores the evolving nature of the regulation and proposes aggressive, if not wholly unrealistic, purchase targets that are inconsistent with guidance provided by ARB members to ARB staff, as well as the operational viability of these technologies, procurement schedules of transit agencies and the availability of funding. The Association, of course, supports efforts to increase the deployment of near-zero and zero-emission transit vehicles in California, but we will continue to emphasize that such efforts must not jeopardize the fiscal solvency of California’s transit agencies or diminish their ability to maintain and/or expand transit service-levels. Ultimately, the Association believes that any action to implement cleaner transit fleet technologies must be cost-effective and supported with new funding.

If you have any questions, please do not hesitate to reach out to me directly at josh@caltransit.org or at 916-446-4656.

Sincerely,



Joshua W. Shaw
Executive Director

cc: Members and Staff, California Air Resources Board