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May 21, 2018

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed Beneficiary Mitigation Plan, VW Environmental Mitigation Trust

Chairwoman Nichols and Members of the Board,

CARB staff has proposed to limit funding from the \$130 million Mitigation Plan budget for transit buses, school buses, and shuttle buses, to no more than 50% of total funds to any one bus category. We believe this limitation does not adequately address the needs, nor the demand, for transit buses that operate in far greater numbers than the other bus modes. More than 10,500 transit buses, carrying more than 916 million passengers annually, serve California's most densely populated areas, where respiratory health problems are of greatest concern.

We would like to propose that CARB consider increasing public transit's allocated share of funds to reflect the size of the statewide public transit fleet and passenger ridership relative to school buses and shuttle fleets.

Under staff's proposal, transit would only be eligible to purchase 162 fuel cell electric buses or 361 battery-electric buses, considering a maximum allowable allocation of \$65 million as currently proposed. This would support the procurement of only 1.5% to 3.4% of the total transit bus inventory in the state, yet transit agencies in California purchase on average 1,000 or more new buses each year. There is also a growing interest among agencies in California to begin making the transition to Zero-Emission buses now.

An alternative to an increase in the percentage of funds allocated to transit, would be to increase the total allocation for all three bus categories, with a guaranteed amount of \$80 million or more for transit fleets.

We believe there is sufficient justification for this request given the significant role public transit plays in transporting millions of people annually throughout our state.

Sincerely,

Jaimie Levin
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