

November 14, 2022

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

RE: Fiscal Year 2022-23 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 2022-23 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 the portion of the \$2.6 billion in Greenhouse Gas Reduction Fund and General Fund spending that would be available to public transit agencies operating transit buses, locomotives and/or ferries. More specifically the Association supports, the following proposed investments:

\$75 million for Advanced Technology Demonstration and Pilot Projects: This proposed investment would help demonstrate and eventually commercialize various zero-emission heavy-duty vehicle types, including but not limited to, zero-emission rail technologies and zero-emission capable commercial harborcraft. Such funding has the potential to support the elective transition to these zero-emission heavy-duty vehicle types by California's rail and ferry agencies and could assist these agencies with meeting compliance with new CARB regulations that would compel their transition to 100% zero-emission fleets. We encourage CARB to ensure that, as these funds come online and program guidelines are developed, that they are explicitly available to public rail and ferry agencies. We further encourage CARB to ensure that funding for zero-emission rail technologies support the deployment of zero-emission locomotives and multiple units.

\$60 million for Commercial Harborcraft: This proposed investment would help fund the deployment of Tier-4 and zero-emission capable marine technologies. A portion of funding will be prioritized for private ferry operators and the remaining funding will be prioritized for public ferries, licensed commercial passenger fishing vessels, research vessels, and excursion vessels. We encourage CARB to ensure that, as these funds come online and guidelines are developed, it maximize the level of funding available for public ferries deployed by public transit agencies, recognizing that these ferry agencies have faced significant financial challenges created by the COVID-19 pandemic and play a critical role in inciting mode shift to mass transportation.

\$260 million for HVIP Standard and \$70 million for HVIP-Zero-Emission Buses: These proposed investments would continue to help reduce the incremental cost of zero-emission buses and trucks, supporting the deployment of these commercial technologies. We support the exclusion of public fleets from the fleet size limits and encourage CARB to continue to work with the Association and our members to streamline and improve the process by which transit agencies access these funds. Streamlining the process for accessing these funds would support their expeditious drawdown by transit agencies and further accelerate the deployment of zero-emission transit buses. Additionally, consistent with our advocacy in response to the Innovative Clean Transit regulation's Comprehensive Review, we continue to encourage CARB to update its funding guidelines to ensure transit agencies retain continued access to funding from HVIP.

The Association greatly appreciates this opportunity to comment on the FY 2022-23 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,



Michael Pimentel
Executive Director

cc: Sydney Vergis, Chief, Mobile Source Control Division
Peter Christiansen, Manager, Innovative Heavy-Duty Strategies Section,
California Air Resources Board
Andrea Morgan, Air Resources Engineer, Innovative Heavy-Duty Strategies
Section, California Air Resources Board