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October 14, 2016

California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

RE: Comments in Response to Air Resource Board's Proposed Modifications to Fiscal Year 2016-2017 Funding Plan

Dear Chairwoman Nichols:

The Antelope Valley Transit Authority (AVTA) writes in response to your proposed modifications for the Fiscal Year 2016-17 Funding Plan for Low Carbon Transportation and Fuels Investments and the Air Quality Improvement Program (Funding Plan). AVTA appreciates the opportunity to submit the following comments.

Heavy-Duty Vehicles and Off-Road Equipment Funding

AVTA urges the Board to move additional funding into its Zero-Emission Truck & Bus Pilot Commercial Deployment Projects (Truck/Bus). As a transit agency committed to transitioning 100 percent to zero emission technologies, AVTA was encouraged by the Board's Truck/Bus Solicitation as well as by the strong demand for projects from around the state. However, the limited amount of funding made available vis-à-vis the extraordinary demand for funding shows that the Board has a unique opportunity to further accelerate transit agency transition to zero emission technologies by funding additional zero emission transit projects that have already cleared the necessary red tape and are "shovel ready". It is not easy for a transit agency to devote the type of resources it takes to develop a high quality project of the nature demanded by the Truck/Bus solicitation. Because of this, the Truck/Bus program offers perhaps the most immediate and efficient pathway for further accelerating transition into zero emission technologies within the transit agency space. We would encourage the Board to explore opportunities to take advantage of the numerous remaining high quality Truck/Bus projects that, but for the limited funding available, could already be helping California meet its GHG and other climate change goals.

Prioritizing Funding for Zero Emission Technologies

Related to the comments above, AVTA wants to acknowledge the Board's (and the staff's!) leadership in developing innovative projects and programs that are helping transit agencies like AVTA transition from legacy fuel technologies to clean, green zero emission technologies. This leadership is improving the quality of life in the Antelope Valley as well as in multiple other regions of California. However, there is still much more that needs to be done to help interested transit agencies bridge the gap from legacy fuel technologies to zero emission technologies. In light of that, AVTA encourages the Board to prioritize, as much as is possible and reasonable, funding for zero emission programs and technologies. Doing so will help California continue to build upon its progress in moving California into a sustainable transit future.

Conclusion

As always, AVTA appreciates the opportunity to submit these comments and welcomes the opportunity to answer questions or discuss these matters further. We also welcome and encourage the ARB Board and staff to visit Lancaster and see how zero emission transit solutions are improving the quality of life in the Antelope Valley.

Sincerely,

A handwritten signature in cursive script that reads "Len Engel".

Len Engel
Executive Director
Antelope Valley Transit Authority