



February 20, 2024

Board of Directors

Chairman
Marvin Crist
City of Lancaster

Rui Chen
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Vice Chair
Dianne M. Knippel
County of Los Angeles

Re: Antelope Valley Transit Authority Comments on the Proposed Low Carbon Fuel Standard Amendments

Director
Richard Loa
City of Palmdale

Dear Mr. Chen:

Director
Eric Ohlsen
City of Palmdale

Antelope Valley Transit Authority (AVTA) appreciates the opportunity to comment on the California Air Resources Board (CARB) proposed amendments for the Low Carbon Fuel Standard (LCFS). AVTA supports CARB's initiatives to advance California's climate change goals, including propelling the growth of the nascent heavy-duty charging infrastructure and zero emission vehicle (ZEV) market through the LCFS. We encourage CARB to provide more specificity around requirements to receive DC Medium-and Heavy-Duty Fast Charging Infrastructure (MHD-FCI) credits, in order to ensure accuracy and allow for greater participation in the program.

Director
Raj Malhi
City of Lancaster

About Antelope Valley Transit Authority

Director
Michelle Flanagan
County of Los Angeles

AVTA is a transit agency with 30 years of experience providing mobility and access to over 450,000 residents of the surrounding Antelope Valley region and northern Los Angeles County. AVTA operates a fleet of 100 buses for transit service with 83 fully electric buses dedicated for local service, 19 electric On Request Microtransit Ride Service (ORMRS) vans and 24 electric coaches dedicated to commuter service for over one million rides annually (post COVID ridership). AVTA is the first transit authority in the United States to achieve a 100% zero-emission fleet, and it accomplished this goal in 2022.

Executive Director/CEO
Martin J. Tompkins

The Importance of MHD-FCI Credits and Specifications in Requirements

The LCFS is a critical program for advancing California's climate objectives, including the expansion of electric vehicle charging infrastructure. The funds generated from LCFS credits have had a powerful impact on AVTA's ability to operate and grow, and MHD-FCI credits will allow AVTA to further expand its DC charging network to accommodate its growing fleet and help the state meet its climate and transportation electrification goals.

The proposed amendments contain areas in which the language is ambiguous in regards to some aspects of the criteria for eligibility for MHD-FCI credits. In particular, § 95486.3(b)(1)(B)(2) states that proposed MHD-FCI chargers must be “located within one mile of a reading or pending electric vehicle Federal Highway Administration Alternative Fuel Corridor or on or adjacent to a property used for medium or heavy-duty vehicle overnight parking.” It is unclear what form of measurement is used to determine the one-mile distance from an Alternative Fuel Corridor – options include a straight-line or “as the crow flies” distance (the length of the straight-line drawn from the station to the nearest exit on the Corridor), or a driving distance (the distance measured along the route a vehicle takes from the Corridor to the station). If a station is greater than one mile driving distance from a corridor due to road logistics, but it is less than a mile straight-line distance from the corridor, it is unclear whether the station would meet the criteria for MHD-FCI credits.

AVTA recommends that the one-mile requirement be measured using a straight-line distance and that this be explicitly stated in the language, both for clarity and accuracy, as well as to favor a slightly more inclusive policy with the added effect of promoting more heavy duty infrastructure development in the state. Heavy duty infrastructure is a nascent market that needs additional support in order to reach the state's transportation electrification and climate goals, and allowing for greater participation in this program is one way of providing such support.

It is for these reasons that we propose the following changes:

- Specify the means of measuring a one mile distance in § 95486.3 (b)(1)(B):

“The proposed MHD-FCI chargers must be:

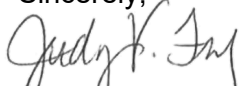
1. Located in California; and
2. Located within a one mile **straight-line distance*** of a reading or pending electric vehicle Federal Highway Administration Alternative Fuel Corridor or on or adjacent to a property used for medium or heavy-duty vehicle overnight parking, or has received capital funding from a State or Federal competitive grant program that includes location evaluation as criteria.”

***The length of the straight line from the charging station to the nearest exit on the Corridor.**

We Appreciate the Transparent Amendment Process

We are grateful for your time and consideration of these comments. We look forward to working with you to support a renewed, strengthened LCFS that will keep the state on track to meet and exceed its climate goals. Please do not hesitate to reach out if you have any questions about AVTA or these comments.

Sincerely,



Judy Vaccaro-Fry, MBM, MPA
Chief Financial Officer
Antelope Valley Transit Authority