

**DOCKETED**

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**AC Transit Comments for Docket Number 21-ALT-01, 2021â€“2023  
Investment Plan Update for the Clean Transportation Program**

*Additional submitted attachment is included below.*



Alameda-Contra Costa Transit District

Michael Hursh, General Manager

September 30, 2021

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**RE: AC Transit Comments for Docket Number 21-ALT-01, 2021–2023 Investment Plan Update for the Clean Transportation Program**

AC Transit appreciates the California Energy Commission (CEC) for its efforts to support zero emissions transit in California, including through its 2021–2023 Investment Plan Update for the Clean Transportation Program. This investment plan is of critical importance to guiding the state’s infrastructure investments and therefore also zero-emission deployments overall.

AC Transit is the largest bus-only transit agency in California, providing 53 million annual rides pre-pandemic in FY 2018-19, and has been a leader in advancing zero emission technology. Since 2000, AC Transit has been building the most comprehensive zero emission bus (ZEB) program in the United States, initially focused on hydrogen fuel cell electric bus (FCEB) technology with a demonstration project in which 13 FCEBs have so far logged over 3.2 million zero emission miles. The number of zero-emission miles logged by just 13 transit buses demonstrates the rigor of the heavy-duty vehicle duty cycle. Considering that a single public transit trip can replace dozens of individual trips by private vehicles, the greatest impact would be accomplished by focusing zero-emission infrastructure investments on the public transit industry.

Additionally, beyond just the magnitude of the quantitative impact of focusing investments on public transit, there is a significant qualitative advantage as well. The Investment Plan spends a considerable portion of the document discussing how the California Energy Commission (CEC) is dedicated to inclusion, diversity, equity, access, and benefiting disadvantaged communities (DACs). The demographics of those that most utilize public transit systems, particularly bus systems, demonstrate that investments in these systems would disproportionately benefit the communities with which the CEC states it is most concerned. 65% of AC Transit riders are from low-income households, 75% people of color, 29% of limited English proficiency, and 43% riders do not have access to a car. These are our riders precisely because we operate in their communities. Facilitating our transition to zero-emission would directly benefit eleven different DACs in our service area by ensuring that the buses that are traveling within those communities are no longer emitting PM 2.5 and NOx, but are rather quiet and emission-free. The demographics of AC Transit ridership are likely reflected in many of the bus transit agencies across the state.

We appreciate that the funding for the program has been front loaded to accelerate deployments and believe that it is not only important to providing immediate benefit to DACs, but also would allow public transit agencies to receive credits for early deployments under the California Air Resources Board (CARB) Innovative Clean Transit Regulation (ICT). AC Transit, like many public transit properties across the state, will be aggressively ramping up investment in both battery electric and hydrogen fuel cell

technologies and will require significant state support to build the infrastructure necessary to accommodate additional zero-emission bus deployments. Expanding the front-loaded investment would allow public transit agencies to further accelerate the transition to zero-emission.

We also recognize that the \$264 million allocated to “medium- and heavy-duty zero-emission vehicles and infrastructure” between FY 2021-22 and FY 2023-24 is a major investment and believe it would be important to identify how the CEC plans on making those investments prior to plan adoption. Making suballocations to transit, freight, drayage, etc. before it has been adopted allows stakeholders to provide input on this important part of the process.

It is noteworthy that the single largest allocation in the Investment Plan is to light-duty infrastructure. While light-duty definitely needs to be part of the equation, those residing in DACs are much more likely to ride public transit than own a zero-emission vehicle, as the cost of these vehicles are considerably more expensive than the conventional internal combustion vehicle. Additionally, those who are most likely to own zero-emission vehicles are also much more likely to work jobs that have a remote option and thus are likely traveling many less miles than those essential workers who, by and large, come from DACs.

Another area where an investment in heavy-duty infrastructure might be more impactful than in light-duty is in the arena of hydrogen fueling infrastructure. Unlike battery electric light-duty vehicles that have relatively affordable options to install the necessary infrastructure at a private residence, hydrogen light-duty vehicles rely exclusively on public infrastructure to fuel. Additionally, light-duty vehicles do not have the duty cycle that would necessitate them to be a hydrogen fuel cell vehicle. Alternatively, heavy-duty vehicle duty cycles often necessitate at least some segment of the fleet to be hydrogen fuel cell due to range, and speed and ease of fueling. Both freight and public transit require that vehicles that are on the road for extended periods of time and when they need to be refueled, they must do so very quickly. While Executive Order B-48-18 dictates the creation of 200 hydrogen fueling stations by 2025, it does not specify whether they should be light-duty or medium/heavy-duty. The heavy-duty market would derive much more benefit from access to hydrogen infrastructure than would the light-duty market. It is our suggestion that you focus these investments on public heavy-duty hydrogen fueling stations along freight corridors and infrastructure for public transit.

As transit agencies across the country are still trying to overcome severe budgetary constraints, California transit agencies are still subject to the mandates of the Innovative Clean Transit rule. And as these transit agencies continue to struggle to maintain service, the available capital that can be devoted to transitioning their fleet is greatly diminished, particularly when the long-term financial forecast remains unclear. Investing in public transit’s transition to zero emission will allow them to stay on course of their carefully deliberated Zero-Emission Bus Rollout Plans, but also provide a significant and tangible benefit to DACs across their service area. We appreciate your consideration and look forward to working with the California Energy Commission to green California’s transportation system.

Sincerely,



Michael Hursh  
General Manager  
Alameda-Contra Costa Transit District