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AC Transit Comments on the California Energy Commission Zero-Emission Vehicle Infrastructure Plan (ZIP)

The Alameda-Contra Costa Transit District (AC Transit) appreciates the opportunity to comment on the development of the state's Zero-Emission Vehicle Infrastructure Plan (ZIP). A comprehensive zero emission infrastructure plan is critical to ensuring that the state is able to make the greatest impact in the areas it prioritizes, most notably climate/air pollution impacts and equity.

AC Transit, headquartered in Oakland, is the largest bus-only public transit system in California and the third largest bus-only public transit agency in the United States. We serve 1.5 million people across 13 cities and eight adjacent unincorporated areas in western Alameda and Contra Costa counties and pre-pandemic were providing 53 million rides annually. Our riders include students, seniors, people with disabilities and the working poor. We have been operating one of the most comprehensive zero-emission bus (ZEB) programs in the United States since 2000. We share the knowledge that we have gained through our decades of experience to weigh in on the ZIP.

In the "market segments" portion of the draft outline for the ZIP, public transit is embedded in the medium and heavy-duty sector. While this may be technically the case, we feel strongly that public transit fleets should be disaggregated from the broader medium and heavy duty as public transit fleets have very different infrastructure needs. Public transit agencies need to design, build, and operate their own infrastructure for their fleets, where the bulk of the medium and heavy-duty sector will likely be relying on publicly available infrastructure. Being unique in this fashion necessitates it being considered separately from the medium and heavy-duty sector at large.

Additionally, we contend that public transit fleets are worthy of consideration on their own due to the disproportionate benefit that early transition to zero-emission would provide to disadvantaged communities, going back to the state's emphasis on equity, and on the zero-emission vehicle market.

Equity being a stated priority in public investment is a worthy and noble guiding principle. Thus, it is noteworthy that the demographics of those who most utilize public transit systems, particularly bus systems, demonstrate that investments in these systems would benefit historically disadvantaged communities who suffer from the greatest impact of poor air quality. 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, and these are the communities that would reap the benefits of

investments in zero-emission public transit.

A focus on transitioning public transit is also important to the overall zero-emission vehicle market development. Public transit is often referred to as a beachhead for the zero-emission heavy-duty sector, as these agencies are early adopters of zero emission technologies and are instrumental in demonstrating a business case for original equipment manufacturers (OEMs) to make the transition to the zero-emission market. The importance of transitioning the public transit industry to zero-emission is further evidenced by the California Air Resources Board adopting the Innovative Clean Transit (ICT) regulation in 2018, well before other fleets through the Advanced Clean Fleets (ACF) regulation which is currently underway. The ICT regulation has a mandate for public transit agencies to move to 100% zero-emission by 2040, whereas ACF is currently proposed to fully transition other fleets to zero-emission by 2045. Ensuring that public transit agencies have the necessary funding for the infrastructure that they own and operate will be critically important for these fleets to meet the requirement of the ICT and to make the impacts to the market that the state is seeking.

While we typically think of chargers, hydrogen dispensers and pumps when we think of infrastructure, to ensure that all systems are operating at peak performance requires a great deal of data. Fleets' hard infrastructure will need to be accompanied with the associated IT infrastructure will be critically important for the zero-emission fleets of the future.

AC Transit applauds the effort of the State and the California Energy Commission on its efforts to develop a vision for statewide infrastructure deployment and we look forward to staying engaged in the process as the ZIP is drafted. Thank you for your consideration.