

DOCKETED

Docket Number:	19-TRAN-02
Project Title:	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
TN #:	258074
Document Title:	Humboldt Transit Authority Comments - Request Funding Incremental Operating Costs of Zero Emission Transit Fleets
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*Comment Received From: Humboldt Transit Authority
Submitted On: 7/26/2024
Docket Number: 19-TRAN-02*

**Request Funding Incremental Operating Costs of Zero Emission
Transit Fleets**

Additional submitted attachment is included below.



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July 26, 2024

Ms. Michelle Vater
Supervisor, Freight and Transit Unit
California Energy Commission
715 P Street
Sacramento, California 95814

Dear Ms. Vater:

On behalf of Humboldt Transit Authority, we write to provide comments regarding Docket #19-TRAN-02 (Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure).

Public transportation is the vanguard of the state's greenhouse gas reduction strategy and, through the ICT mandate, faces one of the most prescriptive and time-bound transitions to ZEV technology. Yet state funding programs are not sufficiently incorporating the operational needs and challenges of transit with respect to zero-emission fleet conversion. To address these needs and support the state's ambitious ZEV goals, **we urge you to consider including a solicitation concept specifically applicable to funding the incremental operating costs associated with zero-emission transit bus charging and refueling infrastructure projects.** Based on the concepts presented in the July 16th workshop, there is no clear way for transit agencies to leverage CEC's funding programs to meet this urgent and near-term need, which we view as a missed opportunity.

The importance of operating funding for our agency and our peers cannot be overstated. Even without fleet transition as required by the Innovative Clean Transit regulation, we face challenges to long-term fiscal sustainability while maintaining full coverage and reliable service on existing routes, let alone expanding service to advance towards state ridership targets.

Without additional support and predictability for the incremental operating costs associated with fleet conversion, our long-term capital investments in zero-emission vehicles and infrastructure are at risk. Operating support for early public transit adopters is critical to kickstart the industry and unlock the capital investment that the CEC supports and advocates for while ramping up long-term efforts to reduce the costs of infrastructure and zero-emission fuel – particularly hydrogen.

Additionally, we implore the CEC to improve the equity of the existing application requirements by streamlining the competitive application and grant management processes. Complex processes favor larger agencies with more staff resources, and often exclude smaller agencies with limited to no staff resources for responding to solicitations and/or managing awards. For example, we encourage the CEC to:

- Greatly enhance coordination with existing funding programs such as the Transit and Intercity Rail Capital Program and other programs administered by CalSTA, Caltrans, and the CTC such



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that transit agencies can access both capital and operating funds via a single, streamlined process,

- Develop processes with greater certainty and predictability for applicants, such as a “first-come-first-served” process or increasing focus on recurring, multi-year programs,
- Allow operating funds to flow directly to RTPAs / MPOs, like the processes established under PUC §99313 and §99314 for State Transit Assistance funds, and
- Avoid reimbursement structures in favor of performance reporting and/or spot-check compliance monitoring.

We recognize the enormous challenges in this work and commend the CEC for its efforts and leadership in this area. We look forward to working with you and welcome the opportunity to discuss these comments further.

Sincerely,

DocuSigned by:

Greg Pratt

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