

DOCKETED

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Project Title:	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
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SRTA Comments on CEC's Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure Concepts

Additional submitted attachment is included below.



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Sean Tiedgen, AICP, Executive Director

July 31, 2024

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

RE: SRTA Comments on California Energy Commissions' Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure Concepts

Dear Ms. Vater:

I am writing on behalf of the Shasta Regional Transportation Agency (SRTA) to address crucial issues highlighted during the recent workshop on July 16, 2024, and provide comments regarding Docket #19-TRAN-02 (Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure).

SRTA is a federally designated metropolitan planning organization (MPO) and state-designated regional transportation planning agency (RTPA) for the entire Shasta County region. Our primary mission is to study and plan for the region's transportation needs, seek funding sources, and determine necessary improvements in partnership with federal, state, regional, and local stakeholders. For over 20 years, SRTA has also managed specialized public transportation services in the Shasta Region's rural areas, known as ShastaConnect (www.shastaconnect.org).

ShastaConnect provides essential demand-responsive transit services to qualified senior and disabled riders across the region. Currently, the service is managed by Dignity Health Connected Living (DHCL) under contract with SRTA, utilizing a fleet of 10 gasoline-powered vehicles. These include cutaways, full-size vans, and a minivan.

The recent workshop underscored a significant challenge: transit agencies like ours face a critical gap in operational funding. This funding is vital for maintaining and expanding transit services, especially as we confront financial sustainability issues. Without adequate support for these operational costs and improvements in alternative fuel technologies, the challenges to transition to zero-emission vehicles and infrastructure are insurmountable.

The transition to zero-emission vehicles presents additional challenges, particularly for small transit services in rural areas. ShastaConnect, operating in a region with varied terrain and climate, including very hot summers and freezing winters, faces unique obstacles in adopting zero-emission technologies. Although battery electric vehicles (BEVs) and hydrogen fuel cell electric vehicles (FCEVs) offer potential solutions, their costs and infrastructure requirements are significant. BEVs, while generally offering lower fueling costs, have limited range, whereas FCEVs, though offering greater range, face significantly higher costs, infrastructure challenges, and hydrogen is largely unavailable. More information about these challenges is available in our Zero-Emission Fleet Transition Rollout Plan for ShastaConnect Services: <https://www.srta.ca.gov/364/Innovative-Clean-Transit-Plan>.

Given these challenges, we urge the CEC to simplify application processes for funding. A streamlined approach would greatly benefit smaller transit agencies, making it easier to access necessary funds and support. Enhanced coordination with existing funding programs could also improve accessibility and efficiency.

We appreciate your consideration of these issues and look forward to opportunities for collaboration to support the transition to zero-emission transit and address operational funding needs in our region. Should you have any questions, you may contact Associate Transportation Planner Mehdi Moeinaddini at mmoeinaddini@srta.ca.gov or (530) 262-6206.

Sincerely,



Sean Tiedgen, AICP, Executive Director
Shasta Regional Transportation Agency