



Alameda-Contra Costa Transit District

May 19, 2021

David S. Kim, Secretary
California State Transportation Agency (CalSTA)
915 Capitol Mall, Suite 350B Sacramento, CA 95814

RE: Draft Climate Action Plan for Transportation Infrastructure

Dear Secretary Kim,

Thank you and CalSTA staff for leading the timely conversation about how the state can invest in the transportation sector to combat climate change, prioritize projects that improve public health, racial equity and safety, and create good-paying jobs. The Climate Action Plan for Transportation Infrastructure (CAPTI), with support from the state's \$75.7 billion surplus, holds great promise for tackling these important issues, and AC Transit is excited to partner with CalSTA to support these efforts.

AC Transit is the third largest transit agency in the San Francisco Bay Area. About 1.5 million people live in the District's 364 square mile service area, which includes 13 cities and eight unincorporated communities in the counties of Alameda and Contra Costa. Our riders include students, seniors, people with disabilities and the working poor.

- Over 25 percent of our residents use reduced fares due to age or disability.
- Sixty-five percent of our riders are low income and 75 percent are people of color, underscoring the importance of our service to historically disadvantaged communities.
- In response to a rider survey conducted during the shelter in place order, 40 percent of riders shared that they relied on us to make essential trips, such as to purchase food or seek medical care, and 27 percent said that they relied on AC Transit to get them to work.
- Nearly half of our riders- 43 percent- said they do not have access to a working vehicle.

AC Transit is pleased to submit the following comments that can help turn the CAPTI framework into meaningful action that benefits all California communities, and in particular disadvantaged communities— typically low-income communities of color— that are more likely to suffer from the effects of climate change.

S1.1 Prioritize Solutions for Congested Corridors Program (SCCP) Projects that Enable Travelers to Opt Out of Congestion

AC Transit strongly supports transit projects that will help to reduce vehicle miles traveled and which improve transit efficiency. This includes the installation of transit-only express lanes that improve bus travel time and reliability, and which increase revenue as more riders are attracted to the system. AC Transit continues to advocate for the creation of a transit-only lane on the San Francisco-Oakland Bay Bridge to improve our Transbay service, which is frequently bogged down in traffic jams. Although our Transbay ridership has been severely impacted due to people working from home and not commuting, the pandemic is, gratefully nearing its end. When the economy reopens, we will continue playing a critical role in the Bay Area's transportation network, connecting with 16 other public and private bus systems, 25 BART stations, six Amtrak stations and four ferry terminals.



Additionally, we continue to support efforts that would allow buses to use highway shoulders to bypass traffic congestion. These bus-only lanes would improve service reliability, improve travel times and help to retain and attract riders to the system. This solution should also be made eligible for funding from the SCCP and include physical improvements to the highway shoulder and necessary safety signage.

S2.1 Implement the California Integrated Travel Project (Cal-ITP)

AC Transit supports efforts to implement contactless fare payment systems. We also support the strategy's proposal to ensure that the project remains elective, which would allow transit agencies to opt into Cal-ITP.

S2.3 Accelerate TIRCP Cycles to Support Transit Recovery with Deployment of ZEV Transit/Rail Fleets and Transit/Rail Network Improvements

AC Transit has a long-standing commitment to preserving and improving the quality and quantity of transit service for the communities we serve. Since 2000, we have been building the most comprehensive zero-emission bus (ZEB) program in the United States, initially focused on hydrogen fuel cell technology and recently expanded to include battery electric buses (BEBs). We opened our first hydrogen fueling facility at our Richmond division in 2002, capable of supporting a single 30-foot bus. Today, we support 26 ZEBs across two operating divisions.

In 2018, the California Air Resources Board (CARB) adopted the Innovative Clean Transit (ICT) rule requiring all large public transit fleets to convert to 100 percent zero emission buses by 2040. Regrettably, no funding has been allocated to support this important transition. Assuming technological improvements drastically reduce costs, our conservative estimate is that it will cost \$312 million to convert our entire fleet to zero emission. Less conservative estimates place this number at \$866 million. Clearly, it will take considerable federal and state financial support to meet the ICT's ambitious and worthy goals.

AC Transit also operates a fleet of non-revenue vehicles, including light duty cars and trucks. In addition to funding to replace these gasoline-powered vehicles with zero emission vehicles, AC Transit will need to build out the charging station infrastructure at its main offices to recharge these ZEVs.

Facilities upgrades are fundamental to achieving emission reduction goals. Almost every transit bus yard in California will need to be retrofitted to accommodate zero emission buses. This will require substantial expenditures, but most programs do not provide funding for fixed facilities.

We support the state's efforts to revamp the TIRCP program to increase its support for zero-emission vehicle purchases and infrastructure buildout. Moreover, we urge that the annual funding for the program increase in line with demand, so that transit agencies like ours have access to a reliable funding stream that will support the purchase of new transit vehicles, infrastructure investments, and workforce development programs needed to meet the state's zero emission requirements.

S2.4 Increase Funding to Active Transportation Program (ATP)

AC Transit supports the Active Transportation Program and encourages strategic investments that deliver first/last-mile solutions that connect people to public transit.



Alameda-Contra Costa Transit District

S3.4 Develop and Utilize Equity Index to Assist in Evaluation or Prioritization of Caltrans Projects

AC Transit is very supportive of this strategy and encourages the state to create an equity tool that incorporates community feedback received through an intensive, multilingual outreach effort conducted in partnership with local community-based organizations. Project scoring should weight projects that have a positive impact toward disadvantaged communities.

S7.1 Leverage Transportation Investments to Incentivize Infill Housing Production

Housing and high-quality transit are complementary to each other. Since 1994, AC Transit has made it its official policy to maximize public transit usage by ensuring that land use decisions are made with full awareness of their impact on public transit. Shifting a substantial portion of trips to transit will require more high-quality transit throughout all types of housing development. We support this strategy and encourage the state to provide new funding to encourage transit-oriented development. Coordinated, integrated investments in housing and transit that consider the local context will play a key role in reaching our climate goals.

Thank you for providing this opportunity to share our feedback on the draft CAPTI plan. AC Transit looks forward to working with you to refine, finalize and implement the final CAPTI Plan. Should you have any questions, please contact me at bgreene@actransit.org, or Claudia Burgos, *Director of Legislative Affairs & Community Relations*, at cburgos@actransit.org.

Sincerely,

A handwritten signature in black ink that reads 'Beverly Greene'.

Beverly Greene
Executive Director of External Affairs, Marketing & Communications

Cc. AC Transit Board of Directors