



May 19, 2020

Re: Comments on CalSTA Draft Climate Action Plan for Transportation Infrastructure

CALSTART is pleased to submit comments on the Climate Action Plan for Transportation Infrastructure (CAPTI) and appreciates CalSTA's consideration of these comments. CALSTART is a national 501(c)(3) nonprofit clean transportation technology consortium. Our over 270 member companies and organizations work with CALSTART to accelerate the clean transportation industry, including car, truck, off-road equipment and bus manufacturers, public and private fleets, electric utilities, and a range of other businesses and nonprofits.

**Clean Transportation
Technologies and Solutions**

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CalSTA took an essential step in aligning California's transportation budget with our state's environmental, public health, and equity goals by unveiling the draft CAPTI. CALSTART commends this effort and offers these suggestions to strengthen the draft CAPTI.

S1. Cultivate and Accelerate Sustainable Transportation Innovation by Leading with State Investments.

CALSTART is supportive of CalSTA's intentions of utilizing state investments to accelerate innovation in sustainable transportation. In particular, S1.4 to mainstream zero-emission vehicle infrastructure within the Trade Corridor Enhancement Program (TCEP) is a necessary action to reduce greenhouse gas emission from the transportation sector and improve public health outcomes in disadvantaged communities. CALSTART is pleased to see the specific references to the need to support medium and heavy-duty vehicles in the transition to zero-emission technologies. We support CalSTA's plan to update the TCEP Guidelines to prioritize projects that demonstrate a significant benefit to improving the movement of freight along trade corridors while also reducing emissions of certain air pollutants. However, this strategy can be strengthened by detailing how "significant benefit" will be measured.

S.1.4 Mainstream Zero-Emission Vehicle Infrastructure within the Trade Corridor Enhancement Program (TCEP)

CALSTART is extremely encouraged to see CalSTA emphasize the importance of the agency in supporting the transition of medium and heavy duty vehicles (MHDVs) to zero-emission technologies called for by EO N-79-20. CalSTA is in a unique position in that it is the guardian of the public dollars collected through the SB 1 program, and we cannot overemphasize the critical role that this agency must play in supporting this transition and, as the strategy calls out, complementing other state strategies in this sector— including CARB's Advanced Clean Trucks and Advanced Clean Fleets regulations. After working closely with other NGOs and the CTC on the last round of public guidelines for the TCEP program, we are pleased to see the commitment to further updates to the TCEP Guidelines "to prioritize projects that demonstrate a significant benefit to improving the movement of freight along trade corridors, while also reducing emissions of diesel particulates, greenhouse gases, and other pollutants by creating or improving zero emissions infrastructure— either within the project itself or within the larger trade corridor."

CALSTART was dismayed to see no zero-emission infrastructure projects brought forward by CalTrans for the last round of TCEP funding and no other sustainable or zero-emission freight projects funded overall in the last round of funding. The importance of an "all hands on deck" approach to transitioning our freight system to zero-emissions cannot be over-

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emphasized. We look forward to participating in the TCEP Guidelines process and hopefully to also helping bring project ideas forward that can transition our freight system. We also look forward to supporting a robust outreach campaign regarding the new guidelines, so that more eligible entities are aware of the ability to apply for funding for zero-emission projects.

S2. Support a Robust Economic Recovery by Revitalizing Transit, Supporting ZEV Deployment, and Expanding Active Transportation Investments

Prioritizing support for transit will remain a critical component for meeting the state's climate and equity goals. The strategies outlined in this section can be strengthened in the following ways:

- For S2.1, we recommend the development of a phone line in tandem with digital services such as a website and app. In addition, we recommend creating a path forward on accepting cash payments, or ways for users to add funds if they only have cash or do not use banking institutions. This will improve access to those individuals that do not have access to certain technologies, like smart phones.
- Regarding S2.3, we recommend options for right-sizing fleets, including multi-modal last mile connections and mobility hubs as part of transit networks, and funding for microtransit offerings.

On S2.4, CALSTART suggests a broad-based approach to ensuring that the funding increase can be sustained over the course of years and is not a one-time increase. One option may be to explore a tax on new TOD developments, especially those that opt out of meeting affordable housing minimums and just pay the fine, or TOD that is strictly market-rate. In addition, we recommend a set-aside of funds that go toward operations, not just capital costs associated with equipment.

Finally, for S2.5, we recommend working with local community groups, schools, and job centers in rural areas and building relationships with tribes as a part of this engagement effort. For example, seeking input from agricultural workers on the types of clean transportation need to commute to and from work could collect insights from a key population this strategy targets.

In addition to these suggestions regarding specific strategies, CALSTART would recommend that CalSTA consider ways of encouraging employers to continue virtual work from home or developing local telecommuting centers where people could have better access to IT and other tools without commuting to inner cities. This could have an impact on keeping VMT down in a post-pandemic world, and could have major emissions impacts.

S4. Advance State Transportation Leadership on Climate and Equity through Improved Planning & Project Partnerships

CALSTART would like to see S4.4 strengthened by specifically calling out ZEVs or alternative fuels. Under S4.6, we were pleased to see a plan for coordination between CARB, CalSTA, and Caltrans to prioritize inclusion of zero-emission freight projects in the CFMP project list, and then actually prioritize funding of these projects. We reviewed the CFMP project list last year and found many worthwhile projects, to our knowledge however, none of them were selected for funding.



Conclusion

CALSTART thanks CalSTA for your leadership on climate issues, and for all the work that went into the plan. Thank you for considering these comments, and we welcome further opportunities to work together to help California lead in clean transportation.

Sincerely,

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