Tahoe Transportation
DISTRICT

Connecting our communities

October 15, 2019

Mary Nichols
Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Fiscal Year 2019-20 Funding Plan for Clean Transportation Incentives

Dear Ms. Nichols,

The Tahoe Transportation District (TTD) appreciates the opportunity to provide comments regarding the Fiscal Year 2019-20 Funding Plan for Clean Transportation Incentives and the current path of the competitive funding eligibility and selection criteria proposed under the California Air Resources Board's (CARB) funding programs.

I would like to bring to your attention the fact that the current focus of CARB's 2019-20 program does not adequately allocate funding to address areas like ours at Lake Tahoe where climate impacts are already causing significant change to our ecological resources and economic health. These changes are the result of physical resource reactions, and through the use of the Tahoe Basin by millions of people within the megapolitan drive-up market whose population continues to grow at a rapid pace. In pursuit of its mission, TTD is undertaking numerous environmentally conscious initiatives to help protect Lake Tahoe. CARB's funding through Community Solutions for Clean Transportation Equity Pilot (CSCTEP) implementation block grants, Volkswagen funding for heavy-duty and off-road, clean mobility and other sources could be vital to the region's success.

TTD requests that CARB consider the Tahoe Basin in their funding plan and competitive grant selection criteria by providing a funding set-aside for disadvantaged communities identified under SB 535, as well as adequate funding for transformative projects to low-income communities pursuant to AB 1550. While the communities of South Lake Tahoe and Kings Beach are not SB 535 identified disadvantaged communities, they are identified as AB 1550 low-income communities. By narrowly falling outside the definition of a disadvantaged community, the region repeatedly fails to meet the traditional benchmarks established by many competitive funding opportunities of California including CARB's pilot project guidelines under CSCTEP. As a low-income community, the area faces many of the same challenges of disadvantaged communities. The exclusion of small residential communities that essentially serve our recreation areas for a large portion of the State's urban population negatively impacts Tahoe's ability to provide solutions to the State's goals. Geographic equity needs to be considered.

An illustration of one of our initiatives is the Lake Tahoe high-speed passenger ferry project plan which includes a regional approach to developing clean energy alternatives consistent with

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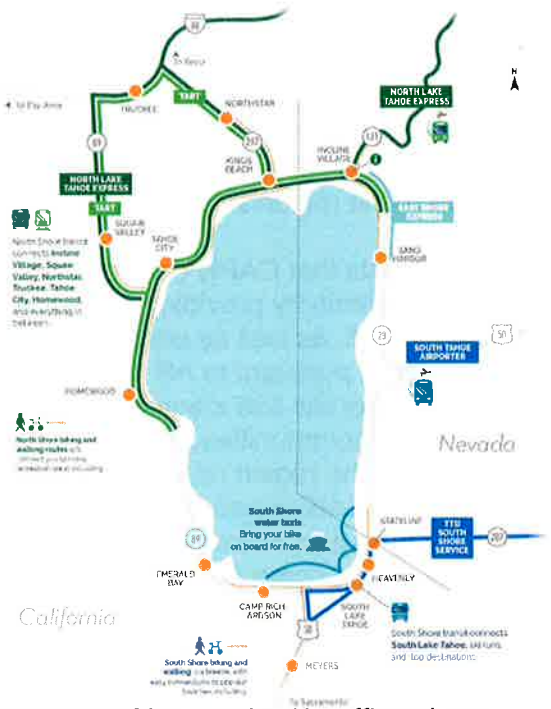
CARB's overarching research initiatives. The work proposed will examine alternative fuel options, fueling and production technologies. It will focus in the areas of energy efficiency, emissions, water quality, human health and costs and compare hydrogen technology with other options such as battery electric and diesel vessels with advanced air emission control technologies. Additionally, the study would include strategies for incorporation of necessary sensor and automation technology that specifically considers the extensive recreational use of Lake Tahoe, extreme weather events, emergency response support, and operational efficiencies. The study would reveal the costs for establishing and operating high-speed hydrogen ferry vessels with lakeside hydrogen infrastructure and explore what other water based (water taxi and other private fleets) and land-based hydrogen fleets (light-duty vehicles, government fleets and buses) could be enabled by hydrogen ferries on Lake Tahoe.

The survivability of the hydrogen technology in the event of catastrophic wildfire, and how the hydrogen vessels can aid in evacuation and emergency power supply during critical emergencies and recovery will be considered. The local production of renewable hydrogen from water electrolysis or local biomass (such as leveraging the proposed biomass facility adjacent to the Interstate 80 freight corridor) would be analyzed. The ferry would provide cross lake passenger service reducing vehicle miles traveled and GHG emissions within the Lake Tahoe Basin while bolstering the resiliency of the region's limited transportation network, which is susceptible to extreme weather events and wildfires, as well as general congestion caused by heavy Recreation Travel Demand[1].

Tahoe is visited by more than 20 million visitors annually—the vast majority arriving by personal vehicle. With 78 percent of the land base owned and managed by the U.S. Forest Service (USFS) and the Lake operated as a federal reservoir (BOR and USCG), 86 percent of the Basin is federally managed. Another seven percent is in local and state ownership. The small amount of urban development is concentrated in small communities around the Lake. Transit and transportation system improvements and operations are focused on serving a large urban demand within a rural scale transportation network. This Recreation Travel Demand is not accounted for in the State's greenhouse gas (GHG) reduction strategies nor funding strategies, however, addressing these long trips across California could assist the State in closing the six percent gap in GHG targets.



[1] Recreation Travel Demand or tourism trips occupy a major part of interregional traffic volume, especially in frequently visited areas such as Lake Tahoe. Historically, transportation planning has been led by urban and metropolitan planning.

TTD is committed to providing clean and sustainable transportation solutions for Lake Tahoe. In the past three years, TTD competed for, and was awarded, three consecutive years of Low or No Emission federal grants to support our clean transit initiative. The initiative is focuses on improving fleet reliability, reducing GHG emissions, and providing a clean, quiet transit solution, while helping TTD comply with CARB's Innovative Clean Transit Rule years before it is required. However, Tahoe's topography and climate constrains electric bus applications to specific routes and imposes limitations on operable bus size. Current electric bus manufacturers are targeted to urban settings and have limited application in montane settings, such as Lake Tahoe, therefore it is imperative to find solutions that work.

During the December 14, 2018 Board approval of the Clean Transit Initiative, Ms. Judy Mitchell eloquently stated, "A rising tide lifts all boats" and asked CARB staff to work with TTD to assure clean transit works for all. We welcome any opportunity to work with CARB to this end and advance our mutually beneficial agendas. And now that the state of Nevada has joined the Climate Alliance Tahoe offers a bi-state opportunity to work together to bring about the change all seek to grow our clean energy economies and create new jobs, while reducing air pollution, improving public health, and building a more resilient Lake Tahoe that all can enjoy for years to come.

TTD appreciates the opportunity to provide feedback regarding the implementation of the CARB 2019-20 funding plan, as well as the continuing efforts of CARB to address clean transportation solutions throughout California.

Sincerely,

Carl Hasty
District Manager