

California Transit
Association



Zero-Emission Transition Plan Requirements

Wednesday, March 16, 2022
Prepared for Transit Coordinating Committee

IIJA Zero-Emission Transition Plan Requirements

IIJA requires applicants to submit a Zero-Emission Transition Plan for applications related to zero-emission vehicles.

1. Demonstrate a long-term fleet management plan with a strategy for how the applicant intends to use the current application and future acquisitions;
2. Address the availability of current and future resources to meet costs for the transition and implementation;
3. Consider policy and legislation impacting relevant technologies;
4. Include an evaluation of existing and future facilities and their relationship to the technology transition;
5. Describe the partnership of the applicant with the utility or alternative fuel provider; and,
6. Examine the impact of the transition on the applicant's current workforce by identifying skill gaps, training needs, and retraining needs of the existing workers of the applicant to operate and maintain zero emission vehicles and related infrastructure and avoid the displacement of the existing workforce.

ICT Zero-Emission Bus Rollout Plan Requirements

ICT regulation requires California transit agencies to adopt a Zero-Emission Bus Rollout Plan.

1. A goal of full transition to zero-emission buses by 2040 with careful planning that avoids early retirement of conventional internal combustion engine buses;
2. Identification of the types of zero-emission bus technologies a transit agency is planning to deploy, such as battery electric or fuel cell electric bus;
3. A schedule for construction of facilities and infrastructure modifications or upgrades, including charging, fueling, and maintenance facilities, to deploy and maintain zero-emission buses. This schedule must specify the general location of each facility, type of infrastructure, service capacity of infrastructure, and a timeline for construction;
4. A schedule for zero-emission and conventional internal combustion engine bus purchases and lease options. This schedule for bus purchases must identify the bus types, fuel types, and number of buses;

ICT Zero-Emission Bus Rollout Plan Requirements (Cont.)

ICT regulation requires California transit agencies to adopt a Zero-Emission Bus Rollout Plan.

5. A schedule for conversion of conventional internal combustion engine buses to zero-emission buses, if any. This schedule for bus conversion must identify number of buses, bus types, the propulsion systems being removed and converted to;
6. A description on how a transit agency plans to deploy zero-emission buses in disadvantaged communities as listed in the latest version of CalEnviroScreen (<https://oehha.ca.gov/calenviroscreen>);
7. A training plan and schedule for zero-emission bus operators and maintenance and repair staff; and
8. Identification of potential funding sources.

ICT Zero-Emission Bus Rollout Plan Requirements (Cont.)

- To date, 22 transit agencies have submitted their ICT Zero-Emission Bus Rollout Plan to CARB.
 - 21 “large” transit agencies
 - 1 “small” transit agency
- Large transit agencies were required to submit their plans by June 30, 2020.
- Small transit agencies are required to submit their plans by June 30, 2023.

Engagement

- Submitted letter to FTA
- Secured letter from CARB, Caltrans to FTA
- Secured letter from CA delegation to FTA



Connecting us.

February 3, 2022

Nuria I. Fernandez, Administrator
Federal Transit Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Upcoming Zero-Emission Transition Plan Requirements

Administrator Fernandez:

On behalf of the California Transit Association, I write to you today in response to your *Dear Colleague* letter, dated December 1, 2021. This letter addresses new programmatic requirements for the Federal Transit Administration's (FTA) Buses and Bus Facilities Competitive Program and the Low or No (Low-No) Emission Program resulting from the enactment of the Bipartisan Infrastructure Investment and Jobs Act (IIJA). For the reasons stated below, the Association respectfully urges FTA to permit California's transit agencies to submit their Zero-Emission Bus Rollout Plans, required by California's Innovative Clean Transit (ICT) regulation, to meet the new requirements of these programs.

In California, the Association worked productively with the California Air Resources Board (CARB) from May 2015 through December 2018 to develop and ultimately enact the ICT regulation. The ICT regulation, the first regulation of its kind in the nation, requires California's transit agencies to transition to 100% zero-emission bus fleets by 2040 and institutes a series of requirements, including a ZEB purchase mandate, to reach this objective.

With the passage of the IIJA, the Buses and Bus Facilities Competitive Program and the Low-No Emission Program will now share similar application requirements with the ICT regulation: the programs and ICT regulation each require transit agencies to submit a version of a zero-emission transition plan to guide the methodical deployment of zero-emission buses. The ICT regulation requires transit agencies to submit to CARB a Zero-Emission Bus Rollout Plan, which must align with the following criteria:

- A goal of full transition to zero-emission buses by 2040 with careful planning that avoids early retirement of conventional internal combustion engine buses;
- Identification of the types of zero-emission bus technologies a transit agency is planning to deploy, such as battery electric or fuel cell electric bus;
- A schedule for construction of facilities and infrastructure modifications or upgrades, including charging, fueling, and maintenance facilities, to deploy and maintain zero-emission buses. This schedule must specify the general location of each facility, type of infrastructure, service capacity of infrastructure, and a timeline for construction;
- A schedule for zero-emission and conventional internal combustion engine bus purchases and lease options. This schedule for bus purchases must identify the bus types, fuel types, and number of buses;
- A schedule for conversion of conventional internal combustion engine buses to zero-emission buses, if any. This schedule for bus conversion must identify number of buses, bus types, the propulsion systems being removed and converted to;

Low-No and Bus and Bus Facilities NOFO

- Released on March 7
 - **\$1.1 billion** in competitive funds under Low-No
 - **\$372 million** under Bus and Bus Facilities
- Applications due May 31
- Series of webinars now scheduled:
 - Today, March 17: All Applicants
 - March 22: Focus on Zero-Emission Fleet Transition Plans
 - March 23: Urban Applicants
 - March 30: Rural and Tribal Applicants

FAQ

Can a previously adopted Fleet Transition Plan be included in the application?

A: Yes. If the previously prepared or adopted Plan meets the requirements as stated in the Bipartisan Infrastructure Law (BIL), Pub. L. 117-58f, then it can be included in the application. Applicants can provide a Cover Letter or Addendum to provide information required by the BIL that is not included in the previously adopted Fleet Transition Plan.

NOFO

“FTA will rate a zero-emission project higher than other zero-emission projects if the applicant is able to demonstrate how the proposed project and fleet transition plan support the conversion of the agency’s overall fleet to zero-emissions.”

Outstanding Questions re: Zero-Emission Transition Plan Requirements

- How will FTA determine if a previously adopted Plan meets the requirements of the IIJA?
 - And, what metrics will be used to evaluate a previously adopted Plan?
- What must be included in a Cover Letter or Addendum?

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