



DEPARTMENT OF TRANSPORTATION

May 26, 2026

Chair Lauren Sanchez
California Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: Stakeholder Comments on Proposed Quantification Methodology and Priority Re-Weighting for Transit and Intercity Rail Capital Program (TIRCP) and Low Carbon Transit Operations Program (LCTOP)

The California Air Resources Board (CARB) must protect robust capital infrastructure allocations for public transit agencies within the funding of TIRCP and the LCTOP. Changes that eliminate or reduce focus on agency capital infrastructure will have devastating impacts on local, municipal transit systems like the City of Pasadena. Shifting Cap-and-Trade auction proceeds toward decentralized, direct-to-consumer incentives midstream, particularly amid a changing federal funding landscape, will leave agencies stranded halfway through their zero-emission transitions, regardless of whether it's mandatory or not.

Pasadena has secured funding and ordered vehicles to successfully convert 50 percent of its paratransit and fixed route fleet to zero-emission by next year. This significant step toward emissions reduction is a direct result of strategic grant stacking using TIRCP, LCTOP, and HVIP funding. These state capital programs have been the backbone of Pasadena's structural zero-emission transition, proving that transit agencies are already delivering zero-emission reductions directly to the public.

Pasadena has halted all capital investment in internal combustion technology to focus agency resources entirely on zero-emission infrastructure. This focus was made under the assumption of stable state partnerships. Municipal transit infrastructure projects require long-term, multi-year capital deployment. This includes facility development, utility coordination, and complex fuel supply networks that cannot be adjusted or abandoned mid-stream without severe financial and operational penalties.

Small and mid-sized operators will be left stranded in a devastating position if state funding priorities shift at this critical juncture. Agencies cannot simply revert to legacy procurement strategies after dismantling their combustion engine support pipelines. Depriving municipal operators of infrastructure grants forces a choice between halting transit service entirely or absorbing devastating local liabilities to reconstruct abandoned fossil-fuel procurement paths.


The broader zero-emission transition risks becoming financially and operationally infeasible statewide if mid-sized transit agencies are forced into a downward operational spiral. The regional

transit network cannot afford a repeat of the severe financial and infrastructure distress experienced by early adopters such as the Anaheim Transportation Network, which has since ceased operations. When infrastructure funding is limited to mid-transition, clean-energy investments, which are much more expensive, degrade the financial stability of transit operators and collapse the market scale required to keep clean technology financially viable.

The consequences of defunding public transit infrastructure in pursuit of decentralized consumer incentives will fall disproportionately on the most disadvantaged members of the state. Public transit serves captive riders who lack the financial means to participate in consumer electric-vehicle or e-bike subsidy programs. Subsidizing individual vehicle ownership while allowing municipal transit networks to fail undermines the core equity mandates of California's climate policy, leaving transit-dependent populations without essential, clean mobility.

The City of Pasadena strongly requests that CARB insulate active municipal transit grants, protect the structural integrity of TIRCP and LCTOP capital allocations, and value long-term systemic VMT reduction over short-term consumer vehicle deployment.

Sincerely,



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