December 29, 2009

Economic and Allocation Advisory Committee (EAAC)
California Environmental Protection Agency
1001 I St
Sacramento, CA 95812

Dear Chairman Goulder and EAAC Members,

As the primary transit operator in the San Gabriel and Pomona Valleys of Los Angeles County, Foothill Transit understands the significance of comprehensive planning to reduce regional greenhouse gas (GHG) emissions through coordinated land use, transportation, and cap-and-trade policies. Foothill Transit is pleased to provide contextual considerations to your committee and we appreciate your tireless efforts on this front.

The Foothill Transit Joint Powers Authority is comprised of 22 member cities and Los Angeles County. We advocate the provision of adequate transit funding from a cap-and-trade program to become a sustainably-backed allocation of state resources and to catalyze the cyclical reduction of GHGs and the creation of new jobs. With the right resources, transit will be a principal means to meet these aims.

To scale back GHG levels to those of 1990, transit is key. As noted by the Regional Targets Advisory Committee (RTAC) in its final recommendation to the California Air Resources Board (CARB), transit will have to expand its services substantially over the next decade to meet these lofty goals and to accommodate increased service demands as a result of population growth. With over five billion dollars in state transit funds cut since 2000, public transportation providers struggle to provide more service with fewer resources and are now being stretched to their limits to meet the goals of AB 32. State funding to transit enables the viability of long-term policies, consistent with AB 32. Specifically, it sparks a cycle of comprehensive planning, clean fuel propulsion technologies, and green job growth.

An overall reduction in GHG emissions simply must require an immediate increase in public transportation funding. As such, Foothill Transit recommends the following key factors for your consideration in the development of the cap-and-trade system:

1. **An increase in transit funding from cap-and-trade revenues will enable transit agencies to plan comprehensively with Metropolitan Planning Organizations (MPOs) to meet the subsequent goals of AB 32.** While the argument for funding transit operations has certainly been made clear and is convincing, there is also a preliminary need for funding the transit agency-MPO planning process. If the goal of SB 375 is to make land use and transportation planning work together, at both the local and regional levels, the state certainly cannot neglect to specifically fund the extensive planning...
process that will focus on how to make this collaboration successful. The amount of time and resources transit agencies will ultimately spend on ‘planning for the plan’ cannot be overlooked. Transit funding must be available to start this process.

2. **Public transit funding is forward thinking in its capacity to accommodate increased ridership levels as a result of population growth and promotes less personal vehicle usage.** According to the California Department of Finance, California’s population is expected to increase to 48 million by the year 2020. The California High Speed Rail Authority reported that congestion costs California $20 billion annually in wasted fuel and time. Current expenditures are neither economically feasible nor environmentally friendly. Population growth means more cars on the road and most notably—more emissions. With funds allocated to implement the regional plans outlined above, public transit will provide solutions to both population growth and its consequent effect on GHG emissions by taking cars off of the road. State funding for public transportation projects offers a plausible alternative to current, environmentally destructive modes of transportation and is a sustainable, long-term policy, capable of enduring increased ridership and meeting regional reduction targets outlined in SB 375.

3. **Cap-and-trade funds dedicated to transit will support GHG reductions and will simultaneously signal the creation of green jobs.** To meet reduction targets, sufficient portions of cap-and-trade funds must be allocated to transit projects. The Foothill Transit Ecoliner (scheduled to launch in 2010) provides a prime model for examination of the relationship between investment in transit, clean technology, and job creation. The Ecoliner is a zero emissions prototype transit bus that utilizes innovative, quick-charge battery technology and light-weight composite body construction to operate in a transit system for up to 24 hours a day, seven days a week. Foothill Transit has committed over five million dollars to develop this model – an investment that will have impact well beyond our region. With just the first of three initial bus shells constructed, 29 new jobs were created as a direct result of this investment. The American Public Transportation Association (APTA) has repeatedly stated that investments in transit lead to the creation of green jobs and the Ecoliner is an immediate example of this truth. With appropriate funding, transit agencies will enable MPOs to meet regional reduction targets through the utilization of advanced modes of public transportation and create green jobs.

Funding for public transportation cannot be overlooked. It is an integral step in regional GHG emissions reductions and in moving California toward an environmentally and economically sustainable future.

Thank you for your time and consideration.

Sincerely,

Doran J. Barnes
Executive Director

[Logo: Foothill Transit]