



May 15, 2008

Mr. Panama Bartholomy  
Land Use Subgroup of the Climate Action Team (LUSCAT)  
1516 Ninth Street, MS-33  
Sacramento, CA 95814-5512

Mr. Bartholomy,

Thank you for the opportunity for the California Transit Association to comment on the draft LUSCAT Submission to the CARB Scoping Plan on Local Government, Land Use, and Transportation. Overall, the Association supports the recommendations made in the LUSCAT draft report, and offers the following comments:

The California Transit Association supports the LUSCAT's recommendation to reduce greenhouse gas (GHG) emissions through reductions in vehicle-miles traveled (VMT). Public transit plays an essential role in reducing VMT, by providing commuters and other community members an alternative to travelling by private automobile, which results in fewer cars on the road. Emissions from road vehicles are the largest contributors to smog. By taking existing public transportation instead of driving a car, a single person saves 4,800 pounds of CO<sub>2</sub> per year. Public transportation produces 95 percent less carbon monoxide (CO), 90 percent less in volatile organic compounds (VOCs), and about half as much carbon dioxide (CO<sub>2</sub>) and nitrogen oxide (NO<sub>x</sub>), per passenger mile, as private vehicles. Therefore, the California Transit Association recommends that the promotion of public transit as a significant way to reduce VMT be a prominent component included in the report to the ARB.

Page 64 of the LUSCAT draft report recommends for State consideration the "adoption of policies that increase transit capacity potential of suburban centers to better enable transit in those areas." In addition to increased transit potential within suburban areas, the California Transit Association supports research into the adoption of policies which increase and facilitate transit capacity *between* suburban areas and city centers.

The California Transit Association acknowledges the LUSCAT's regional approach in requesting the ARB to define and establish regional emissions targets, and to provide guidance to achieve these targets. Transit already has regional partnerships established and seeks to continue to build these relationships to work to reduce GHG emissions under this regional approach. Those who govern and manage public transit systems work closely with their colleagues at the local and regional government level to ensure seamless, efficient and effective transit service planning and delivery. In fact, many "transit systems" are actually operated by departments or divisions of cities or counties. Where joint powers authorities are organized solely for purposes of providing transit, by definition those systems are run by city and county officials. And, even when the service is provided by a special transit district created in California law, those agencies are almost always governed by board members appointed by local cities and counties.

And, in all these cases, the local transit system staff work closely with the regional transportation planning agency, local county transportation commission, and/or metropolitan planning organization staff to coordinate the planning of transit capital investment projects and the programming and funding of projects and local transit operations. Moreover, some of our Association members providing transit service are also the county or regional planning entity or have transportation capital programming responsibilities for their jurisdiction (such as Los Angeles Metro, the Orange County Transportation Authority, or the Santa Clara Valley Transportation Authority). We therefore specifically urge that the LUSCAT's existing call for guidance in achieving regional emissions targets includes advice that regional and local government coordinate land use planning in order to maximize existing transit service and to encourage more investment in public transit as a way to achieve these targets.

Page 64-65 of the draft report recommend that the State consider increasing the availability of transit opportunities through the following strategies:

- Fund transit oriented development planning and public involvement.
- Fund bicycle facility and route improvements, particularly to improve last-mile-to-transit access to bicycle riders.
- Provide funding for incentives to lower transit pass costs to increase ridership
- Increase the pool of funds available for transit projects, and in particular for extending existing transit systems.
- Make funding available for capital investments and operations for feeder service to make the last mile connection to transit.
- Promote programs that reduce driving and congestion while promoting healthy physical activity and connecting interested residents with information and incentives to add more walking, bicycle riding, public transit (including BART), and carpooling
- Make additional investments by the state into modernizing transit facilities, vehicles, systems and trackways to expand capacity and retain current ridership.
- Examine how support for transit could take into account the costs of transit system[s'] shift to clean fuels and efficient vehicles.

The California Transit Association asserts that increased funding for transit on all levels (state, regional, and local) is vital to not only making transit more available to all communities, but to allow transit agencies to both modernize and expand transit service and capacity. A recent article in the Contra Costa times reported that "As gasoline prices climb past \$4 a gallon... commuters are moving to public transit in huge numbers, breaking records on BART, commuter trains and transbay bus routes." Additionally, a recent article in the New York Times states, "Mass transit systems around the country are seeing standing-room-only crowds on bus lines where seats were once easy to come by. Parking lots at many bus and light rail stations are suddenly overflowing, with commuters in some towns risking a ticket or tow by parking on nearby grassy areas and in vacant lots." Both articles illustrate that transit systems nationwide are faced with finding new ways to support record numbers of transit riders. While transit systems celebrate increased ridership, it has become apparent to both operators and riders that more resources are required to help transit fulfill the needs of the public in service, safety, and comfort. Thus, greatly increased funding to transit is the most important strategy that the ARB can include in its scoping plan. Better transit services will lead to less cars on the road and therefore less GHG emissions, thus

helping California achieve the goal of reducing GHG emissions to 1990 levels by 2020, as mandated in AB 32, the Global Warming Solutions Act of 2006.

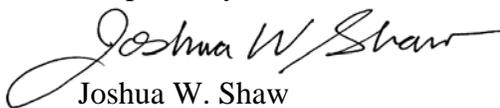
Another essential component to transit's role in GHG reduction would be the "greening" of public transit, as incorporated in to the last strategy listed above: Examine how support for transit could take into account the costs of transit systems' shift to clean fuels and efficient vehicles. The ARB has already required California public transit systems to reduce emissions through the Transit Fleet Rule, which has created considerable costs to these systems for compliance. While California public transit systems share ARB's goal of reducing air pollution and have made good progress in introducing alternative fueled vehicles into existing fleets, the funding needed to support a shift to cleaner, more efficient vehicles remains substantial. We encourage the LUSCAT to emphasize this important fact in its report.

Finally, the California Transit Association offers a recommendation for securing some of the additional funding for public transit that it has suggested throughout this letter. The ARB is currently considering cap-and-trade schemes in its aim to reduce GHG emissions. Cap-and-trade auctions for carbon allowances could provide substantial revenue for the State of California; revenue that could be used directly for public transit investment. A current bill being heard in Congress, the Lieberman-Warner Climate Security Act (S. 2191), allocates revenue from emission allowances directly for public transit investment. The California Transit Association supports this idea and asks that the LUSCAT include this recommendation for increasing California public transit investment in its submission to the ARB scoping plan.

Public transit can play an invaluable role in helping the State to achieve substantial greenhouse emissions reductions by 2020. With a combination of increased state, local, and regional funding, as well as land use policies that support transit-oriented development, public transit can provide a safer, healthier, and more efficient mode of transportation for all Californians.

Thank you for considering our comments, and please feel free to contact me at 916-446-4656 with any questions.

Respectfully,

  
Joshua W. Shaw  
Executive Director