



vRide World Headquarters | 1220 Rankin Drive | Troy, Michigan | 48083 | 248-597-3500 | www.vRide.com

March 8, 2013

RE: Proposal for CARB Cap and Trade Investment Plan

vRide, the nation's largest private provider of commuter vanpools, wishes to offer its comments on and proposal for investing cap and trade revenue to address the state greenhouse gas reduction goals while maintaining continuity with the state environmental and transportation planning processes.

As a private provider of public transportation, vRide provides commuter vanpools throughout the state. This provision of service is done both with the contractual support of local transit and planning agencies and in the absence of that support. The relationships vRide forges with employers throughout the state allows for an understanding of the employer issues with the employee commute, and allows vRide to tailor its services to best meet the needs of both the employee and employer. We currently have these relationships with such employers as Costco and Quest Diagnostics. This has the unique benefit within public transportation of only placing and operating services when they are going to be used, and immediately shifting services in order to meet shifts in demand.

vRide generally supports the submission by the Transportation Coalition for Livable Communities. The focus on meeting regional planning goals, consistency with the implementation plans required by SB 375, and the integration of land use strategies with transportation strategies are all crucial to the long-term success of the California GHG regulatory framework. vRide would especially like to call attention to the Coalition's call for a cost effective investment portfolio in order to achieve the maximum reductions in GHG emissions from the transportation sector.

In highlighting the need for cost effectiveness in the investment portfolio, vRide calls on the Administration and CARB to place a priority framework around measures of cost effectiveness for the funding proposals approved under this investment plan. Regardless of whether the plan is funded solely at the local level or at the regional level, the state has an interest in maximizing and leveraging the auction proceeds through the investment plan to get "the most bang for the buck". By emphasizing cost effectiveness, the Administration can help ensure that projects with small funding requests but a disproportionate impact on emissions reductions will have a place in the portfolio.

vRide respectfully points out that commuter vanpools should have a place in this portfolio given a cost effectiveness criterion in the investment plan. No other

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mode of public transportation is able to provide a larger emissions reduction per subsidy dollar, as shown in the charts that follow this letter. While the overall footprint of those reductions may pale in comparison to larger infrastructure investments over time, commuter vanpooling has advantages in flexibility and timing that allow it to be implemented immediately through existing programming.

There are a number of existing vanpool programs at the local and regional levels that support this flexibility in commuter choice. Major funding is provided for vanpools through SANDAG, Los Angeles County MTA, OCTA, VVTA, and the Riverside Transportation Commission. Small-scale programs exist through AMBAG, Fresno COG, Madera County Transportation Commission, Napa County TPA, SACOG, SBCAG, Tulare County Association of Governments, and the Ventura County Transportation Commission. By providing for a cost effective criterion in the investment plan requirements, and with an emphasis on funding existing, high value programming, the Administration can help create quick successes that have real impacts on local communities.

To give a sense of the potential in vanpooling, just analyzing vRide's operations in California, we have a corporate target of growing the number of vanpools in operation by 10% per year every year. Taking into account and leveraging the existing transportation investments in vanpooling, vRide believes that this level of aggressive growth across the state is not only possible, but probable with an increased investment. By putting in place a small addition to the subsidies in place in southern California and by creating an equivalent subsidy program in the rest of the state, vRide believes that a total \$26 million investment over 5 years could result in a reduction of more than 900,000 tons of CO₂ and 35,000 tons of CO over the same time period.

We hope that we have added to the discourse surrounding how to move investments forward to better protect air quality in California, and we look forward to working with all stakeholders through this process.

Sincerely,

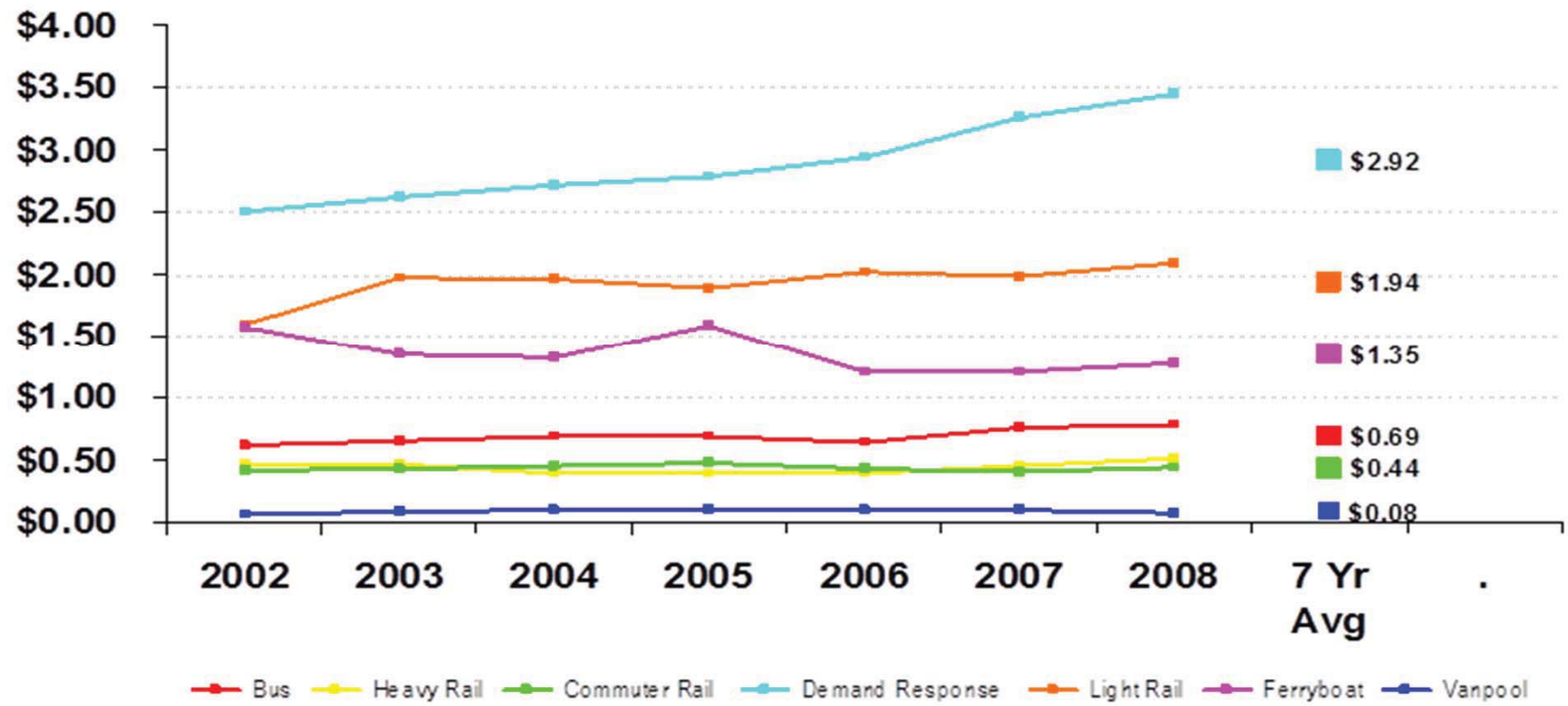
A handwritten signature in black ink, appearing to read 'C. Simmons', with a long horizontal line extending to the right.

Christian W. Simmons, JD
Director, Government Relations (State and Local)

Encl. (1)

Vanpool Mode Comparison

Comparative Efficiencies:
Public Subsidy per Passenger-Mile
 2002-2008 National Transit Database Reporting System

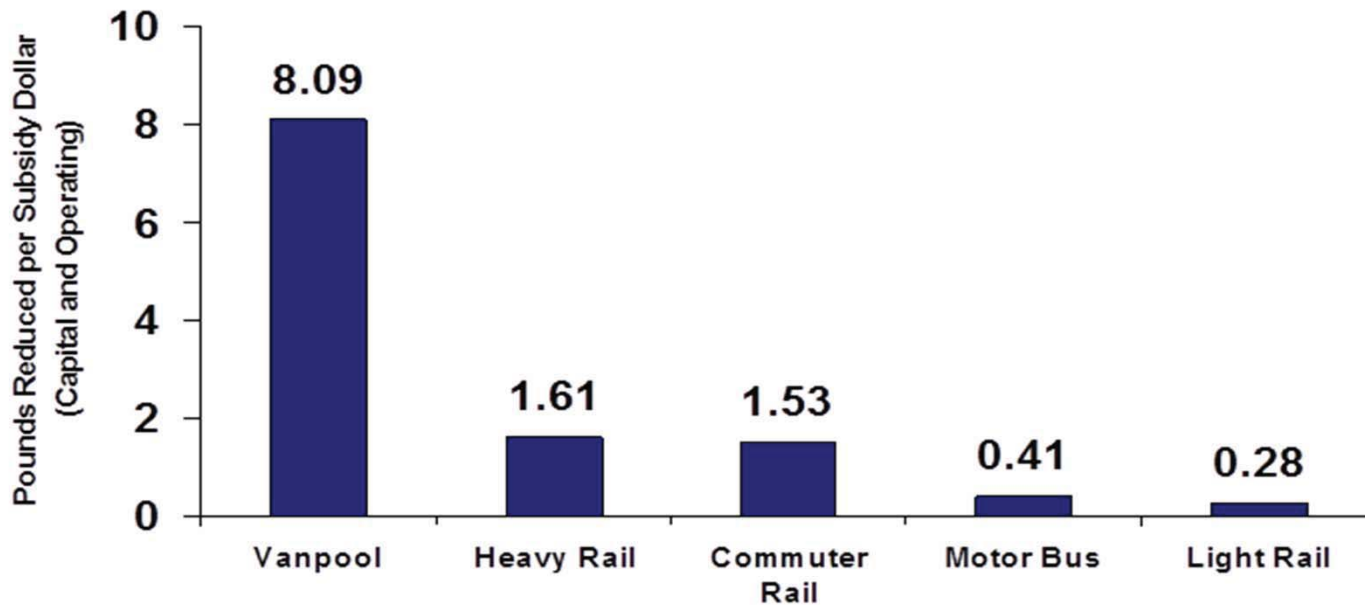


$(\text{Operating Expense} + \text{Uses of Capital} - \text{Fare Revenue}) = \text{Subsidy}$



Vanpool Mode Comparison

Comparative Efficiencies:
Pounds of CO₂ Reduction per Subsidy Dollar
2002-2008 National Transit Database Reporting System



Data Sources: Private auto; single occupancy, 20.3 mpg average fuel economy – U.S. Environmental Protection Agency
Transit Modes: based on Passenger-Miles, Fuel and Electricity Consumption, Uses of Capital Funds, Operating Expenses and Fare Revenues in the Federal Transit Administration's 2007 National Transit Database. Figures are national averages weighted by Passenger-Miles. Emission factors for fuels from U.S. Department of Energy. Emissions factors for electricity from eGRID sub-region data, U.S. Environmental Protection Agency.

