



August 26, 2008

Ms. Mary D. Nichols
Chairman
California Air Resources Board
1001 I Street
Sacramento, CA 95812

**RE: AB 32 Draft Scoping Plan - Transportation and Regional Land Use
GHG Reduction Goals**

Dear Chairman Nichols:

On behalf of the more than 1,500 member organizations of the American Public Transportation Association (APTA), I want to thank you for the opportunity to provide comments on the AB 32 Draft Scoping Plan (the "Draft Plan"). APTA applauds the State of California for its commitment to significantly reduce the emission of greenhouse gases (GHGs), and we appreciate the work of the Air Resources Board to implement the groundbreaking AB 32 legislation.

The Draft Plan reports that 38 percent of GHG emissions in California are produced by the transportation sector. To reach the AB 32 target of reducing the GHG emissions within the state to 1990 levels by 2020 and to position California to subsequently meet a long range goal of an 80 percent reduction of GHG emissions from 1990 levels by 2050 (Executive Order S-3-05), the Draft Plan must provide clear guidance on reducing transportation-related emissions. APTA's comments are targeted to help the Draft Plan accomplish its emissions reduction goals as related to transportation emissions.

At present, the Draft Plan sets strong 2020 goals for the reduction of the transportation-related emissions via new fuel efficiency standards (California Light-Duty Vehicle Standards - 31.7 MMTCO₂E, Heavy/Medium Duty Vehicles - 2.5 MMTCO₂E) and a new low carbon fuel standard (16.5 MMTCO₂E). These goals are prudent and are to be commended, but the Draft Plan is missing a critical element in its guidance regarding transportation-related emissions: it lacks a distinct goal for emissions reductions from reduced growth in vehicle travel as measured by vehicle miles traveled (VMT).

The Draft Plan references the role of public transportation, land use and other strategies that reduce vehicle travel in relation to emission reductions under the Local Government Actions and Regional Target, but the reduction goal for this sector, 2 MMTCO₂E, is very small. The goal does not reflect the scale of potential emissions reductions from curbing VMT growth, and it does not acknowledge that a failure to address growth in vehicle travel will severely hinder the Draft Plan's overall effort reduce transportation-related emissions.

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For example, public transportation is a proven means to reduce transportation-related emissions. By reducing travel and congestion on roadways and supporting more efficient land use, transit prevents the emission of 37 million metric tonnes of carbon dioxide (CO₂) in the U.S. every year.¹ In 2006, California transit systems carried more than 1.4 billion passenger trips, roughly 14 percent of all trips on transit in the U.S. While a more detailed analysis would be required to estimate current and future emissions reductions from transit service within the state, it seems very likely that GHG emissions savings from public transportation already exceed the 2 MMTCO₂E Local Government Actions and Regional Target set by the Draft Plan.

Recent research also indicates that the projected growth in private motorized vehicle travel in the next 30 years will negate much of the projected emission savings from increased vehicle efficiency and reduced carbon content of fuels.² APTA is presently engaged in a major research initiative in conjunction with the American Association of State Highway and Transportation Officials (AASHTO), the Natural Resources Defense Council (NRDC) and numerous other groups to study the full scale of emission reductions that are possible by reducing growth in VMT. This project will offer clear strategies to reduce VMT and tackle the larger issue of transportation emissions.

Finally, to maintain and expand emissions reductions from public transportation within California, transit systems will need to sustain and expand their service, enhance capacity and increase coverage to provide the public with more transportation choices. As a result, it will be necessary to secure existing funding sources, and expand sources of funding for new transit services. For example, the Scoping Plan should prioritize transit as an eligible recipient of revenues from any market mechanism implemented under AB 32. Investing in transit now will prepare California for its 2020 emissions reductions goals, as well as its 2050 emissions reductions goals.

Thank you for your consideration of these comments. APTA wishes to help the Air Resource Board and the State as it develops the AB 32 Scoping Plan. If we can be of further assistance or for questions, please contact Homer Carlisle at (202) 496-4810 or hcarlisle@apta.com.

Sincerely yours,



William W. Millar

President

WWM/tjj

¹ ICF International, "The Broader Connection between Public Transportation, Energy Conservation and Greenhouse Gas Reductions," February 2008. http://www.apta.com/research/info/online/land_use.cfm

² Urban Land Institute, "Growing Cooler: The Evidence on Urban Development and Climate Change," Don Chen, Reid Ewing and Steve Winkelman, January 2008. <http://www.smartgrowthamerica.org/gcindex.html>