



SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT

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2007

October 1, 2007

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VIA E-MAIL

Ms. Edie Chang, Chief
Planning and Management Branch
Office of Climate Change
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: AB 32 Scoping Plan – Suggested Emission Reduction Measure

Dear Ms. Chang:

Thank you for the opportunity to provide suggestions for potential greenhouse gas (GHG) emission reduction measures that could be included in the Scoping Plan that ARB is currently preparing pursuant to AB 32. Given the magnitude of the effort necessary to meet AB 32's directive that California's GHG emissions be reduced to 1990 levels by 2020, reductions will be needed from all sectors of the state's economy. Since many sectors are outside the sphere of ARB's traditional regulatory authority and expertise, the participation of a broad cross-section of the state should help identify many feasible and cost-effective GHG emission reduction measures for implementation by 2012.

Attached to this letter is a suggested GHG emission reduction measure calling for actions to increase use of public transit. As stated in the suggested measure, the Metropolitan Transportation Commission has indicated that in the San Francisco Bay Area, trips to work represent 20% of vehicle trips but 40% of vehicle miles travelled (VMT) and 40% of passenger vehicle GHG emissions. As a result, reducing vehicle trips to work will have a disproportionate impact on reducing VMT and passenger vehicle GHG emissions. This is just one benefit of increasing use of public transit. Transit's much greater energy efficiency per passenger mile and lower greenhouse gas emissions than passenger vehicles make public transit an important part of the solution to climate change.

A report titled "Public Transportation's Contribution to U.S. Greenhouse Gas Reduction" released on September 26 by the American Public Transportation Association (APTA) (available at www.apta.com) concluded that when using the existing transportation infrastructure, a new transit rider with a 20-mile

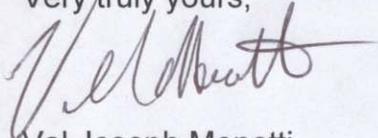
round trip to work would cause only a small increase in greenhouse gas emissions from transit while reducing vehicular GHG emissions by approximately 4,800 pounds of CO2 per year. According to the APTA report, this reduction compares quite favorably with other GHG-reducing steps available to individuals, such as replacing five incandescent light bulbs with compact fluorescent bulbs (445 pounds CO2 per year) or replacing an older refrigerator/freezer (335 pounds CO2 per year). In addition, the report states that use of transit has a multiplier effect on reducing VMT, so that each passenger mile travelled on transit reduces overall VMT by 1.4 to 9 miles, depending on location and other factors.

BART's own analysis shows that on a collective passenger-mile basis, each BART rider is responsible for approximately 10 to 15% lower GHG emissions than is the driver of a single-passenger vehicle.

As we discussed in our recent meeting, BART is in the process of assembling background information and calculations regarding several aspects of BART-specific greenhouse gas benefits in the San Francisco Bay Area, including the reductions in regional Bay Area VMT resulting from BART extensions, potential GHG emission reductions available from station access improvements and other transportation demand management strategies. We will provide these materials to you within the next several weeks.

Thank you again for the opportunity to present this suggested emission reduction measure, and to discuss the GHG emission benefits of transit with you and your staff. If you have any questions concerning our proposal, please contact me at 510-287-4794 or by email at vmenott@bart.gov.

Very truly yours,



Val Joseph Menotti
Deputy Planning Manager - Stations

Attach.

cc: Robert DuVall - ARB

Attachment 1: Description of Emission Reduction Measure Form

Please fill out one form for each emission reduction measure. See instructions in Attachment 2.

Title: Increase Use of Public Transit

Type of Measure (check all that apply):

- | | |
|--|---|
| <input checked="" type="checkbox"/> Direct Regulation | <input checked="" type="checkbox"/> Market-Based Compliance |
| <input checked="" type="checkbox"/> Monetary Incentive | <input checked="" type="checkbox"/> Non-Monetary Incentive |
| <input checked="" type="checkbox"/> Voluntary | <input type="checkbox"/> Alternative Compliance Mechanism |
| <input type="checkbox"/> Other Describe: | |

Responsible Agency: ARB , MPO's, regional and local transit agencies, local governments, others

Sector:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Transportation | <input type="checkbox"/> Electricity Generation |
| <input type="checkbox"/> Other Industrial | <input type="checkbox"/> Refineries |
| <input type="checkbox"/> Agriculture | <input type="checkbox"/> Cement |
| <input type="checkbox"/> Sequestration | <input type="checkbox"/> Other Describe: |

2020 Baseline Emissions Assumed (MMT CO₂E): tbd

Percent Reduction in 2020: tbd

Cost-Effectiveness (\$/metric ton CO₂E) in 2020: tbd

Description: Presentations by the Metropolitan Transportation Commission on vehicle use in the San Francisco Bay Area indicate that home to work trips represent approximately 20% of vehicle trips, but represent 40% of passenger vehicle miles travelled. Thus, increasing the use of public transit for commuters will have a disproportionately large impact on reducing greenhouse gas emissions from passenger vehicles. By decreasing traffic congestion and thereby improving overall fuel economy, increased transit ridership also has an indirect positive impact on reducing vehicular GHG emissions.

This measure would consist of transit agencies and others taking and encouraging various steps to increase transit ridership. The potential measures are numerous, and include steps such as enhancing access to rail and bus transit systems, increasing system capacity, constructing system improvements such as rail extensions and dedicated bus lanes, making service improvements to increase transit's attractiveness to potential riders, adjusting fares, improving connectivity between systems (both for

transfers and fare collection), adoption of transit-friendly land use policies, providing employer and employee incentives for transit use, establishing disincentives for use of single-passenger vehicles, and providing opportunities for transit-related GHG emission reductions to be traded to other sources, for uses such as emissions mitigation or offsets.

Additional information regarding cost-effectiveness and emission reduction calculations will be provided within the next several weeks.

Emission Reduction Calculations and Assumptions: tbd

Cost-Effectiveness Calculation and Assumptions: tbd

Implementation Barriers and Ways to Overcome Them: A key potential barrier is the availability of funding for transit improvements. Existing transit funding sources are limited and overstretched. If the state decides to distribute GHG emissions allowances to regulated sources through use of an auction, some of the auction proceeds could be used to provide new, expanded funding for transit.

Potential Impact on Criteria and Toxic Pollutants: Vehicular emissions of criteria pollutants and toxic air contaminants are reduced by reducing passenger vehicle VMT, both on a regional level and with regard to high-emissions areas such as along freeways. Electric rail and bus transit vehicles would not contribute to such emissions. To the extent that increased use of transit vehicles using diesel fuel (e.g., buses, some locomotives) might contribute to increased emissions of diesel particulate matter, transit operators could be encouraged to purchase low-emitting or alternative-fuel transit vehicles.

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