



Metro

**Los Angeles County
Metropolitan Transportation Authority**

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Ms. Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments Regarding Draft Concept Paper for Cap and Trade Auction Proceeds Investment Plan

Dear Ms. Nichols:

The Los Angeles County Metropolitan Transportation Authority (Metro) respectfully submits this comment letter on the Draft Concept Paper regarding the Cap-and-Trade Auction Proceeds Investment Plan. This letter includes GHG reduction strategies that have already been researched and quantified (cost and GHG reduction potential) by Metro as well as comments and suggestions for the Draft Investment Plan.

Metro appreciates the opportunity to provide details of our current efforts to reduce greenhouse gas emissions (GHGs). Metro's future long-range GHG reduction plans and technology implementations would benefit greatly from funding assistance from the Cap-and-Trade revenue proceeds.

Background and Greenhouse Gas Reduction Efforts

Metro is the principal provider of public transportation in Los Angeles County. Metro also serves as the County's transportation planner and coordinator, designer, builder, and operator; making it unique among the nation's transportation agencies. More than 9.6 million people – nearly one-third of California's residents – live, work, and play within its 1,433-square-mile service area. Over the last decade, more than 92 percent of air toxic pollutants from Metro's bus fleet have been reduced through use of CNG buses. LA County residents taking transit also offset about a billion passenger car vehicle miles each year which translates to saving an estimated 420,000 metric tons of CO₂ emissions annually. Metro is committed to fund smarter Highways for those who cannot take transit or alternate transportation options. **Metro has successfully implemented many innovative projects and programs to further its sustainability goals, much is left to be done and the state's help is needed to fund these programs.**

Priorities for Cap & Trade Auction Investment Plan

Metro has reviewed the Draft Concept Paper as well as the Governor's Executive Order B-16-2012 and agrees that programs, technology and infrastructure related to transportation should be the highest priority when identifying greenhouse gas reduction programs. Metro also agrees with the proposed budget for 2013-14 which described the priorities for the investment of auction proceeds and stated that *"Transportation is the single largest contributor to GHGs in California (38%), and reducing transportation emissions should be a top priority..."* As a

starting point for addressing this challenge, Metro endorses the use of the principles proposed by the Transportation Coalition for Livable Communities to refine the draft Investment Plan, with the understanding that the funds allocated to the SCAG region will be programmed by the county transportation commissions consistent with the 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS).

Sustainability is a core business value at Metro and has been a key focus of the agency since the adoption of AB 32. Our staff has developed significant expertise in the implementation of cost-effective, high impact greenhouse gas reduction measures to reduce emissions from our internal operations, as well as, from the countywide transportation system.

We offer the following findings and funding recommendations based on local research, analysis, and plans.

Agency Operations

In addition to its transportation core mandate, Metro is committed to ensuring that its operations also significantly contribute to the overall efforts to reduce GHGs. We have done so through the implementation of projects related to energy-efficiency and renewable energy efforts, water conservation, recycling, waste minimization, clean fuels use, efficient operational controls and fueling operations, clean vehicle purchases, use of green chemicals and new vehicle technology assessments. We consider in the implementation of these efforts the cost-effectiveness and life cycle of impacted products, activities, and projects. All of these activities are documented in www.metro.net/projects/ecsd.

Metro's Climate Action and Adaptation Plan (2012) and Greenhouse Gas Emissions Cost-Effectiveness Study (2010) established a framework to identify the areas of greatest opportunity for Metro to reduce GHG emissions and evaluated opportunities based on cost and the volumes of emissions they reduce. As a first step, we focus on prioritizing the most promising opportunities to reduce emissions from Metro's internal operations by the year 2020. Opportunities include:

- **Vehicle Technology Strategies** – On-board and Wayside Energy storage systems for Metro's rail service capture energy from propulsion of railcars that is otherwise lost. Metro is currently piloting these systems on some of our rail lines. Additionally, Super-Low Emission/Zero-Emission busses could contribute to significant GHG reductions. Metro is actively exploring biomethane fuel use and the zero-emission bus technology. We are requiring our contractors to only use the cleanest emitting equipment in all construction efforts at Metro sites or projects constructed by Metro.
- **Building Energy Strategies** – Energy efficiency strategies include expanding the use of renewable energy (solar photovoltaic and co-generation) and comprehensive energy upgrades such as lighting upgrades and retro-commission of building systems.
- **Water Use Strategies** – Municipal recycled water for bus washing, on-site water reclamation, and low water sanitary fixtures can reduce GHG impact of Metro operational procedures.
- **Other Strategies** – Metro's employer incentive and vanpool programs have been determined to be highly cost-effective in reducing greenhouse gas emissions, especially in areas of limited transit investments. Metro will increase its diversion of solid waste streams to

increase its recycling rate and will increase the use of recycled and locally sourced materials in all of its construction projects. We continue to explore innovative ideas and technologies to reduce operations cost in areas of green procurement. We have also began the operation of our electric vehicle charging network at our outlying park and ride locations, providing electric vehicle owners the choice take transit to the center of Los Angeles and help reduce traffic congestion at inner city destinations.

- **Partnerships** – We have formed partnerships with our utility providers (electricity, water, natural gas) to develop regional solutions to decrease greenhouse gas emissions, while Metro is expanding a much needed public transportation system.

Metro has developed the expertise to initiate and sustain innovative projects and programs consistent with the intent of AB 32 and the principles outlined in the Draft Concept Paper. In addition to our Climate Action and Adaptation Plan, we have also developed comprehensive studies and plans that address energy management and resource conservation that can be used as a template by our sister agencies across the state and implement for a collective statewide carbon footprint reduction. Metro will be able to provide assistance and accelerate the expansion of these efforts locally with additional state funding.

Countywide Transportation System

In 2008, LA County voters approved Measure R, a ½ cent sales tax that will fund 12 new transit projects and improve the operation of our freeway system. The massive expansion of the transit network provides the foundation for a more sustainable transportation system in Los Angeles County and is the core of our region’s Sustainable Communities Strategy. To leverage these investments and maximize their regional sustainability benefit, Metro actively engaged in the development of the RTP/SCS, developed a Transit-Oriented Development Grant program, made Sustainability a criterion in the Call for Projects, and adopted a Countywide Sustainability Planning Policy (CSPP) and Implementation Plan. These actions have built organizational capacity and have strengthened our local understanding of the most cost-effective strategies for reducing emissions through mode-shift, vehicle technology and congestion reduction.

Subsequent to the adoption of the RTP/SCS, the Metro Board approved a Joint Work-Program with SCAG to ensure early progress on key reduction strategies and to prepare for the 2016 plan update. Implementation of discrete elements of the Joint Work-Program and Metro’s CSPP Implementation Plan would be a good fit for funding under the Cap and Trade Investment Plan as they have low administrative costs and can be implemented quickly. These include:

- **Active Transportation**—First-Last Mile infrastructure to implement Metro’s First-Last Mile Strategic Plan and existing local station access plans.
- **Transit Service**—Improved/expanded service and asset management/capacity enhancement plans to accommodate projected growth in existing transit corridors.
- **Zero Emission Freight Corridor Demonstration Project**—Test technologies being considered for inclusion in I-710 South corridor improvements.
- **Sustainable Transportation Demonstration Projects**—Implementation of comprehensive, integrated transportation programs (capital, operations, policies, programs) to test “best-fit” strategies for mode-shift in different contexts (regional centers, compact urban neighborhoods, suburban, etc.)

- **Transit-Oriented Development Planning Grants**—Expanding reach of existing program.
- **Safe Routes to School**—Expansion of existing program to reach more schools.
- **Plug-In Electric Vehicle Infrastructure**—Implementation of regional and sub-regional PEV Readiness Plans.
- **Smart Highways** – Increase intelligent transportation system investments for better traffic flow, less delay, fewer accidents, faster help when emergencies occur, and immediate response and warnings to drivers about any freeway accident.
- **Performance Measurement Tools, Before and After Studies, and Data Collection**

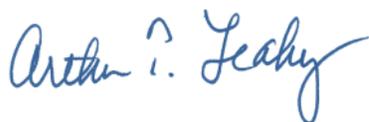
Across all project areas, meeting the objectives of AB 32 *as well as* fulfilling the requirements of a region’s SCS in a **cost-effective** manner should be prioritized. The Draft Investment Plan should incorporate SB 375 and SB 535 goals into its funding priority as these goals achieve the same objectives of AB 32 and have already been identified and quantified.

Metro’s agency operations and countywide transportation system efforts span across the Los Angeles region, portions of which may be described by the CalEPA tool (e.g., CalEnviroScreen) as disadvantaged communities. Improving the County’s transportation system and related infrastructures through the allocation of funds in the project areas outlined above would therefore fulfill the goals of SB 535. Transportation’s role in GHG reduction is further complemented by the recognized co-benefits in the areas of reduced air pollution and improved health, improved mobility and safety, reduced traffic congestion, enhanced energy security, job creation, and protection of natural resources through efficient operations.

Metro’s analysis and plans recognize that there is no silver bullet for reducing greenhouse gas emissions from transportation. Investment strategies must be multi-modal and integrated with complementary transportation and land-use policies. A well-planned, well-used public transportation system, active transportation network and smarter highways and vehicles are all part of the solution.

Metro appreciates the opportunity to provide comments on the Draft Concept Plan and looks forward to reviewing the Draft Investment Plan later this month. We look forward to working with CARB and the implementing agencies on these projects for the communities that we serve. Please feel free to contact me at (213) 922.6888 should you have questions regarding this letter.

Sincerely,



Arthur T. Leahy
Chief Executive Officer