



SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT
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2020

November 4, 2020

Lateefah Simon
PRESIDENT

Mark Foley
VICE PRESIDENT

Robert Powers
GENERAL MANAGER

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Low Carbon Fuel Standard – Potential Regulation Amendments

Dear Air Resources Board Staff,

DIRECTORS

Debora Allen
1ST DISTRICT

Mark Foley
2ND DISTRICT

Rebecca Saltzman
3RD DISTRICT

Robert Raburn, Ph.D.
4TH DISTRICT

John McPartland
5TH DISTRICT

Elizabeth Ames
6TH DISTRICT

Lateefah Simon
7TH DISTRICT

Janice Li
8TH DISTRICT

Bevan Dufty
9TH DISTRICT

Thank you for the opportunity to provide comments following the October 14-15, Low Carbon Fuel Standard (LCFS) Public Workshop. The San Francisco Bay Area Rapid Transit District (BART) is a steadfast supporter of the LCFS program and has participated as an opt-in entity since 2016 as an operator of an electrified fixed-guideway transit system.

As identified within the Air Resources Board's (ARB) potential regulation amendments, BART recognizes staff's intent to clarify the spending requirements on LCFS proceeds from "electricity credits." To that end, BART strongly supports a sector-specific approach to spending requirements to maintain sufficient flexibility in the use of proceeds to allow for both continued investment in BART's fixed-guideway system, as well as day-to-day operational expenditures required to maintain safe, reliable and affordable transit service for Bay Area residents and visitors.

Today, under BART's Board-adopted LCFS policy, proceeds generated from LCFS credit sales are reinvested into its system. This includes direct support for sustainability-oriented capital projects and annual operating budgets. Given its role as an operator of a public transit system relying on over 90% GHG-free electricity to power its system, BART views these uses as tightly aligned with the goals of the LCFS regulation and the state's broader objectives to achieve decarbonization of its transportation sector. As potential amendments to the LCFS Regulation are further developed, we support continued eligibility of spending for these purposes and recommend including clear program definitions to ensure successful compliance by all participants.

Thank you for the opportunity to provide comments on the potential amendments to the LCFS regulation. We look forward to further discussions on BART's role and contributions in advancing California's ambitious climate goals.

Sincerely,

Val Menotti
Chief Planning & Development Officer