

September 27, 2016

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

RE: The Role of Public Transit in the 2030 Target Scoping Plan

Member of the California Air Resources Board:

On behalf of the California Transit Association, I wish to thank you for the opportunity to comment on the California Air Resources Board's (ARB) "Public Workshop on the Transportation Sector to Inform the Development of the 2030 Target Scoping Plan Update" and "Discussion Document on Potential State-Level Strategies to Advance Sustainable, Equitable Community and Reduce Vehicle Miles Traveled." The Association represents more than 200 transit-related entities in California, including transit agencies, original equipment manufacturers, and part suppliers. Taken together, our members provide the vast majority of the 1.44 billion unlinked transit trips taken in California annually, and drive innovation in the transit sector that reduces greenhouse gas (GHG) emissions and improves air quality. We write to you today to emphasize the importance of expanding the state's investment in public transit capital, maintenance and operations as a means to achieving our greenhouse gas (GHG) emissions targets for 2030 and beyond.

As you know, presentations at the Public Workshop and the Discussion Document found that the state must support transit as an alternative to single-occupancy vehicle travel by investing in transit projects that expand capacity, increase service levels, and improve accessibility and reliability for the traveling public. The Association supports these investments with the understanding that they are crucial to inciting mode shift from would-be choice riders, establishing transit equity for the transit dependent, and achieving our state's long-term environmental goals. While transit agencies have benefited in recent years from the ongoing investment of Greenhouse Gas Reduction Fund (GGRF) dollars in the Transit and Intercity Rail Capital Program (TIRCP), the Low Carbon Transit Operations Program (LCTOP) – programs that were broadly outlined in the ARB's previous Scoping Plan – the funding transit agencies receive is inadequate to meet the growing demands on our transit systems, and the need for transformational change in the travel patterns of all Californians. We, therefore, urge ARB to advance the priorities outlined in the presentations at the Public Workshop and the Discussion

Document by advocating for increased ongoing funding for the TIRCP and LCTOP as well as increased funding levels for the various transit-supporting Low Carbon Transportation programs.

In highlighting the importance of transit funding to achieving our state's environmental goals, ARB and legislative leaders must also acknowledge that transit agencies continue to face declining support from their primary source of state funding, the State Transit Assistance program. While we recognize that this funding source falls outside of the range of this scoping process, we firmly believe that indifference toward this reality will undermine our ability to maintain reliable and efficient transit service, and diminish the benefits of investments of GGRF dollars in transit capital and operations. The Association and its members will continue to advocate, before the Legislature and Brown Administration, for increased funding for the State Transit Assistance program; we encourage ARB to also underscore the criticality of this funding to maximizing the benefits of the state's limited GGRF dollars, and to achieving the state's ambitious GHG emission reduction targets.

Finally, the Public Workshop highlighted the role that the proposed Advanced Clean Transit regulation will play in reducing GHG emissions from California's transit fleet. We will continue to emphasize to this Board and its Executive Team that we believe that transitioning California's transit fleet to zero-emission technologies must not jeopardize the fiscal solvency of California's transit agencies or impact their ability to maintain and/or expand transit service-levels. Ultimately, the Association believes that any action to implement cleaner transit fleet technologies must be cost-effective and supported with new funding, and performance-based and technology neutral. For their part, transit agencies across California will continue to implement new cleaner technologies, while still recognizing that there is little the state can do that will have more of an impact on the communities they serve than improving the frequency and reliability of transit service.

We look forward to further engaging with you in the development of the 2030 Target Scoping Plan. Please reach out to me at matt@caltransit.org or at 916-446-4656, if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matt Robinson', with a long horizontal flourish extending to the right.

Matt Robinson
Legislative and Regulatory Advocate