



Alameda-Contra Costa Transit District

Rick Fernandez, General Manager

December 5, 2008

Chairwoman Mary D. Nichols  
California Air Resources Board  
Headquarters Building  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

RE: AB 32 Climate Change Scoping Plan

Dear Chairwoman Nichols:

On behalf of the Alameda-Contra Costa Transit District (AC Transit), thank you for this opportunity to comment on the revisions to the AB 32 Scoping Plan. AC Transit responded to the initial Draft Scoping Plan on July 31, 2008; a copy of that letter is enclosed for reference. We appreciate that some of our initial comments have been incorporated into the final document, including the suggestion that AB 32 revenues be used to encourage facility greening goals through tax incentives and direct cost offsets. Nevertheless, the Plan is largely devoid of public transit's intrinsic relationship to emission reductions and the specifics on how it will play a role in meeting the GHG emission reduction goals.

Once again, we urge you to consider public transit as a direct partner and beneficiary in any cap and trade scheme established by ARB to meet AB 32 targets. There is significant evidence suggesting that the infusion of operating revenues to expand service, extend hours, and reduce headways, increases transit ridership because transit becomes significantly more convenient and easier to use. We believe that unless incentives to increase transit usage play a larger role in the Plan, the combination of population increases and other factors that influence vehicle miles traveled (VMT) will continue to remain an issue and consequently eclipse any benefits gained from advanced fuel technologies.

The final product should expand upon and be more specific on ways to increase transit ridership if the 2020 goals are to be met. Please contact me or my staff member, Kate Miller (510-891-4859/[kmiller@actransit.org](mailto:kmiller@actransit.org)) should you have any questions or require additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rick Fernandez'.

Rick Fernandez  
General Manager

Attachment: July 31 letter