



**CALIFORNIA
TRANSIT
ASSOCIATION**

1415 L Street, Suite 200 • Sacramento, CA 95814

Phone (916) 446-4656 • FAX (916) 446-4318

E-Mail: info@caltransit.org

www.caltransit.org

August 1, 2008

Mary Nichols
Chair, California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Dear Chair Nichols:

Thank you for the opportunity to comment on the AB 32 Draft Scoping Plan. We appreciate the work of the California Air Resources Board (ARB) in cleaning California's air, and look forward to continuing to work with your staff on the development and implementation of this landmark Scoping Plan. On behalf of the California Transit Association, representing the state's public transit operators and the private sector vendors that supply the public transit industry, I respectfully present the following comments on the Draft Scoping Plan for your consideration:

The Draft Scoping Plan reports that nearly 40% of greenhouse gas (GHG) emissions come from the transportation sector. Investing in public transit is an important strategy for reducing both GHG emissions as well as vehicle miles traveled (VMT), as transit provides commuters and other community members an alternative to traveling by private automobile, which results in fewer cars on the road. Therefore, we urge you to work with your staff and Board to include additional recommendations to enhance public transit effectiveness in the state and its attractiveness to automobile users. Public transportation produces 95 percent less carbon monoxide (CO), 90 percent less in volatile organic compounds (VOCs), and about half as much carbon dioxide (CO₂) and nitrogen oxide (NO_x), per passenger mile, as private vehicles. In addition to mobility and congestion management, transit provides the multiple benefits of air quality, energy efficiency, compact development, economic benefits of reduced household expenditure on transportation and increased social inclusion toward an overall increase in quality of life.

As the transit industry begins exploring techniques for achieving GHG emission reductions, the industry will continue efforts to meet a variety of air quality improvement measures through such methods as the implementation of cleaner diesel technology or alternative fuel technology.

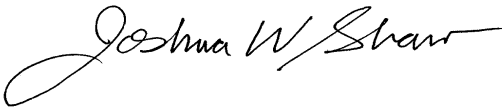
Many of the transportation demand management strategies under consideration in the Draft Scoping Plan will shift travelers on to alternative modes of transportation, including transit. This increased demand for transit will have an impact on transit's operating costs and capital projects. To reduce transportation sector emissions, transit is going to have to sustain and expand service, enhance capacity and increase coverage to provide the public with more transportation choices. The transit industry may need to increase its share of transportation sector emissions to achieve overall reduced emissions for the transportation sector as a whole.

As a result, it will be necessary to secure existing funding sources, and expand sources of funding for new transit services. For example, the Scoping Plan should prioritize transit as an eligible recipient of revenues from any market mechanism implemented under AB 32.

Investing in transit now will prepare California for its 2020 emissions reductions goals, as well as its 2050 emissions reductions goals, and will guarantee better air quality for future generations.

Thank you for your time and consideration. We look forward to helping the ARB and the State to continue its work on the Scoping Plan and to keep California's air clean. If you have any questions, please feel free to contact me at 916-446-4656.

Sincerely,

A handwritten signature in black ink that reads "Joshua W. Shaw". The signature is written in a cursive style with a large, looping initial "J".

Joshua W. Shaw
Executive Director
California Transit Association