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# The County Connection

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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. On behalf of the Central Contra Costa Transit Authority (CCCTA), this letter makes the following comments on the Draft Scoping Plan for your consideration.

## CCCTA

CCCTA is the public bus operator for central Contra Costa County. We have a service area population well over 500,000, and we cover over 200 square miles with fixed route and paratransit services using a combined fleet of 186 vehicles. We have an annual operating budget of over \$34 million and provide nearly \$5 million individual transit trips.

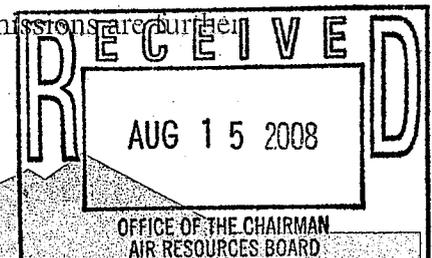
## DRAFT SCOPING PLAN AND TRANSIT VEHICLES

CCCTA notes that the draft scoping plan does not detail down to the types of fuels public transit systems should use to promote the reduction of greenhouse gas (GHG) emissions. CCCTA urges that you continue to refrain from that in the scoping plan. CCCTA does urge that the scoping plan recognize that multiple fuel options are moving forward at various paces and viability such that the final scoping plan should allow for all future options to be explored and used.

For example, diesel hybrid transit buses are rapidly improving and becoming not only very viable operationally, but very cost effective and cost competitive. This is in large part because the entire country is in demand for such a product making it very cost effective for the private sector to produce high quality, affordable and reliable diesel hybrid buses. As you likely know, diesel hybrid buses will help reduce GHG from transit fleets in two ways. First, diesel hybrid buses use at least 30% less fuel in terms of miles per gallon than current conventional clean diesel buses do. So, less fuel is burned.

Second, because a diesel hybrid bus in part runs on electricity, GHG emissions are further reduced.

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Also, there is growing interest among local governments in exploring the on-going development of bio diesel fuels. These also could be used in the future to help transit buses reduced their individual GHG emissions.

Thus, CCCTA urges you to not be fuel specific in crafting the scoping plan and allow for all emerging fuel technologies to develop so that the best solutions can be brought forward as the case may be.

## **DRAFT SCOPING PLAN AND THE ROLE OF TRANSIT**

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 (CO<sub>2</sub>) and nitrogen oxide (NO<sub>x</sub>), 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.

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 AB32.

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 925-685-5031

Sincerely,



Rick Ramacier  
General Manager