

September 10, 2014

Bruce Roberts, Chief
Division of Rail and Mass Transportation
California Department of Transportation
P.O. Box 942873
Sacramento, CA 94273-0001

Re: Comments regarding implementation of the Low-Carbon Transit Operations Program and the Transit and Intercity Rail Capital Program

Mr. Roberts:

On behalf of the California Transit Association, representing California's public transit systems, thank you for the opportunity to provide comment on two new programs – the Low-Carbon Transit Operations Program (LCTOP) and the Transit and Intercity Rail Capital Program (TIRCP) – created as part of the state's efforts to reduce greenhouse gas (GHG) emissions through Cap and Trade. The Association is excited about the prospects that the Cap and Trade program provides for improving and expanding transit service throughout California. The Association looks forward to working with the California State Transportation Agency (CalSTA) and Caltrans as you continue your efforts to develop and implement guidelines for these programs. For each program, we offer the following comments for your consideration in advance of the release of the programs' draft guidelines:

Low-Carbon Transit Operations Program

Valuable tools from the PTMISEA Program should apply. The Association recommends that certain elements of the Proposition 1B PTMISEA Program are also available to transit agencies under the guidelines developed for the LCTOP. These tools include the ability to lend funds to other agencies, pool funding with other agencies for a project of regional significance, bank funding for an approved future project, and the ability for Caltrans to issue letters of no prejudice. This allows transit agencies the flexibility to ensure that the most effective projects are coming forward and that Cap and Trade revenues are being used in an efficient manner.

Allow flexibility in applying disadvantaged community targets. The LCTOP requires transit agencies serving disadvantaged communities (DAC) to spend half of all available funding on projects that benefit a DAC. In some service areas this may be very practical, while in others good projects (that have significant GHG emissions) may suffer at the expense of more limited projects (that benefit DACs). Therefore, CalSTA and Caltrans should encourage broad and flexible eligibility criteria for projects benefitting DACs so that the best projects are coming forward while still providing a benefit to identified DACs. The Association is currently preparing

detailed comments for the Air Resources Board related to DAC guidance and will share those with you once submitted.

Transit and Intercity Rail Capital Program

Clarify the eligibility of bus projects. The statutory requirements surrounding the TIRCP do not do enough to emphasize the eligibility and benefits of bus projects. To the extent possible, the Association supports administrative guidance reflecting the eligibility of bus transit operators to compete in the TIRCP. Throughout the state, bus transit systems carry a significant share of transit riders and are often the only type of service available in rural areas and or within reasonable proximity to individuals living in urban areas.

An equitable distribution of funded projects. The Association recommends that transit agencies throughout the state, both urban and rural operators, receive funding from the TIRCP for projects that reduce GHG emissions. The Association believes that good projects will come from areas of the state with no rail linkage and should not be discounted for a lack of connectivity with rail systems.

Allow for a multi-year commitment of funds. Transit agencies should be able to apply for, and receive, multi-year funding commitments for capital projects. In a single-year, the TIRCP may not be capable of supporting large capital projects or service expansions without sacrificing other valuable projects. Therefore, the Association encourages the TIRCP to commit funds for projects over multiple years to guarantee comprehensive, large-scale projects to come forward. Also, to the extent a transit agency may combine funding to operate a new investment expanding service, the LCTOP should also be available for up-front, multi-year commitments of funding.

Again, we look forward to continuing to work with you as the guideline development process continues. Please do not hesitate to contact me with any questions at 916-446-4656.

Sincerely,



Matt Robinson
Legislative Advocate

Cc: Brian Annis, Undersecretary, California State Transportation Agency
Chad Edison, Deputy Secretary for Transportation, California State Transportation Agency