



July 18, 2008

Ms. Rachel Tornek
Senior Policy Manager
California Climate Action Registry
523 W. Sixth Street
Suite 428
Los Angeles, CA 90014

RE: Comments on Draft Local Government Operations Protocol

Dear Ms. Tornek:

The American Public Transportation Association (APTA) is pleased to provide comments on the June 19, 2008 draft of the Local Government Operations Protocol. APTA is currently engaged in the development of a standard for transit agencies to quantify their greenhouse gas emissions and benefits, and we appreciate the opportunity to provide input to California Climate Action Registry (CCAR). We believe that public transportation provides a unique and distinct source of carbon reductions. Public transportation should be recognized under its own separate protocol.

About APTA

APTA is a nonprofit international trade organization of more than 1,500 public and private member organizations including transit systems and commuter railroads; planning, design, construction and finance firms, product and service providers; academic institutions, state associations and departments of transportation. APTA members serve the public interest by providing safe, efficient and economical transit services and products. Over ninety percent of riders using public transportation in the United States and Canada are served by APTA member systems.

Comment 1: Transit Emissions Must be Disaggregated (Ch. 4, p. 25 and Ch. 7, p. 62)

Transit service is provided under a multitude of institutional forms, both in California and the U.S. as a whole. For example:

- A city (or more broadly, a “local government” as defined in the draft protocol) may run all transit service within its boundaries
- A city may not run any transit service, with all service provided by a special district or another tier of government
- Most commonly, services are provided by both a city *and* a special district or other agency.

Chair
Michael S. Townes

First Vice Chair
Beverly A. Scott

Secretary-Treasurer
Michael J. Scanlon

Immediate Past Chair
Howard Silver

Vice Chairs
Richard J. Bacigalupo
Management and Finance
Matthew O. Tucker
State Affairs
Christopher P. Boylan
Government Affairs
Flora M. Castillo
Transit Board Members
Thomas J. Costello
Marketing and Communications
Gary C. Thomas
Rail Transit
Joyce Olson Eleanor
Bus and Paratransit Operations
Kim R. Green
Business Member-at-Large
Delon Hampton
Business Members
Linda Bohlinger
Research and Technology
Jeanne Krieg
Human Resources
Angela Iannuzziello
Canadian Members
Hugh A. Mose
Small Operations
David Solow
Commuter and Intercity Rail

President
William W. Millar

From our initial conversations with Registry staff, we understand that an aim of the protocol is to provide “apples to apples” comparisons across the wide range of functions performed by local governments. Given the wide varieties of institutional models, this aim would not be well-served by aggregating transit in with other local government vehicle fleets, as implied in Box 7.1 (page 62) and by the breakdown of sectors given on page 25. It would be impossible to quantify emissions from transit within a given region under the approach in the draft protocol.

We therefore urge you to require that local governments disaggregate emissions from transit – or at least, mobile source emissions from transit – in their emission reports. The reporting burden will be minimal, given that public transit providers are already required to report fuel consumption and other data to the federal government, via the National Transit Database (NTD).

Comment 2: Include Emissions Benefits from Transit (Overarching Comment)

Several recent studies have shown that transit brings emission reduction benefits, through displacing private automobile trips, reducing congestion and promoting compact, walkable land-use patterns, far in excess of the actual emissions from transit vehicles and other operations. APTA believes that in order to provide a complete picture of transit “emissions,” these benefits need to be included as Scope 3.

From the comments made by staff during the recent webinar, we understand that this issue will be addressed through the forthcoming community emissions protocol, in the same way as displaced emissions from other sectors such as waste management. However, in this case, the community-level protocol must not only quantify aggregate emissions in a community (similar to existing inventories for climate action plans), but also quantify the specific displacement benefits due to transit. This would allow an assessment of what community-level emissions would have been in the absence of transit. APTA’s Climate Change Standards Working Group has made significant progress on this issue, and we would welcome the opportunity to partner with you in developing this methodology.

Comment 3: Clarify Emissions from Contracted Services (Ch. 12, pp 107-8)

We are pleased that the draft operations protocol clarifies some of the issues with respect to contracted services and operational control (pages 107 to 108). This can be a gray area. We ask you to clarify that a local government should be considered to have operational control over transit emissions if it reports these services to the NTD. This is important for both consistency and to avoid double counting between local governments.

This would imply that:

- A local government that outsources transit service would still be considered to have operational control (and would report data on these services to NTD). This is appropriate given the criteria on p. 108 as (i) this is a service normally provided by local governments; and (ii) the local government exerts significant influence (e.g. specifying routes, schedules and equipment).

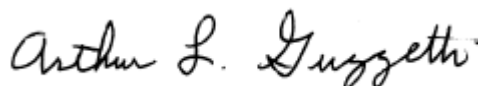
- A local government that operates service on behalf of another local government or transit agency would *not* be considered to have operational control (and would not report these data to NTD).

Comment 4: Reference APTA Standard (Overarching Comment)

The in-progress APTA standard for quantifying greenhouse gas emissions provides detailed guidance to local governments and other transit providers for quantifying their emissions. It addresses a number of issues that are too detailed for the local government protocol, such as the treatment of right-of-way emissions such as signaling and station lighting. To our knowledge, it is fully compatible with both the draft Local Government Operations Protocol and The Climate Registry General Reporting Protocol. We suggest that you reference the APTA standard in the final version of the operations protocol, so that readers are aware of this resource and in order to promote consistency between local governments and other transit providers. We would be happy to present our work on this standard to either CCAR staff or the Local Government Workgroup.

Thank you for the opportunity to comment. Please let us know if we can clarify any of these comments, and to keep you updated with the APTA standard as it progresses. We look forward to working with your staff on these issues and to continue the dialogue toward mutually beneficial outcomes. We hope you will be able to draw upon the substantial body of methodologies APTA and the public transportation industry has undertaken. If you have any additional questions please don't hesitate to contact Rich Weaver at (202) 496-4809 or (rweaver@apta.com), or our Los Angeles APTA working group participant, Timothy Papandreou at the Los Angeles County Metropolitan Transportation Authority at (213) 922-2281 or (papandreout@metro.net).

Sincerely yours,



Arthur L. Guzzetti
Vice President - Policy