



Healthy Communities Program

Melanie Simmons PhD, Director

PO Box 3062240

Tallahassee, FL 32306-2240

Email: msimmons@fsu.edu

Phone: 850.322.4629

Website: <http://cdph.fsu.edu/healthycommunities/>

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RE: LOCAL GOVERNMENT OPERATIONS PROTOCOL COMMENTS

To: California Climate Action Registry, ICLEI - Local Governments for Sustainability, the California Air Resources Board and the Climate Registry

Chapter and Section: Chapter 7 Vehicle Fleet--Page 62 --Transit vehicles

Transit fleets include bus transit systems and commuter railroads. The DRAFT Local Government Operations Protocol currently proposed does not fully measure the greenhouse gas reduction benefits afforded through public transportation service. The following key issues articulate the transit industry's unique situation, sensitivities, and concerns. The issues were specified in a May 1, 2008 letter from William W. Millar, President of the American Public Transportation Association to Diane Wittenberg, Executive Director of the Climate Registry.

The main issue is that public transportation is an essential strategy in reducing the growth of GHG emissions from the land-use and transportation sector.

Public Transportation, by necessity, must initially increase its own GHG emissions in order to reduce regional GHG emissions.

As more emphasis is being placed on transit to mitigate the effects of climate change from the land-use and transportation sectors, the need for more transit service may initially result in more carbon-based fuel and power consumption. For this reason, the transit industry is probably one of the only industries that may have to increase its carbon footprint (by expanding public transportation services) in order to reduce the regional community carbon footprints (by providing options to driving alone).

Public Transportation has unique GHG emissions reporting requirements not reflected in existing protocols.

As an industry, public transportation is unique when it comes to reporting GHG emissions. While the systems use GHG emitting fuels and power sources, the services provided actually reduces the growth of regional GHG emissions had those transit services not been provided in the first place. Public transportation's key benefit is that it provides alternatives to more carbon-intensive commutes like solo-driving. When land-uses are compact and streets are transit-supportive lower/non-carbon intensive trips (walking, bicycling and transit) are more common further reducing regional GHG emissions. Public transportation has multiplier benefits that help reduce the region's overall GHG emissions through reducing the growth of energy-wasting, GHG-emitting traffic congestion that would have been far more severe had those transit services not been in place.

FSU Healthy Communities program, as a member of the APTA working group, seeks revisions to existing protocols.

APTA, as an official standard development organization, has convened a Climate Change Working Group to develop GHG reporting standards that take into account the unique nature of the transit industry. The Florida State University Healthy Communities Program, a member of the APTA Climate Change Working Group, is applying these new tools and measures to transit agencies in Florida for the Florida Department of Transportation Transit Office. The goal is to better equip transit providers to measure their own footprint in a carbon-constrained future, as well as to document the full range of emissions reductions attributable to transit.

The Climate Change Working Group has made enormous progress in developing a displacement protocol/standard (draft by July 2008) that we would like to be considered for inclusion in the Local Government Operations Protocol. This amendment would show how to quantify the emissions reduced by public transportation services (based on size of transit agency and other metrics) to get to a net emissions value. We would like to work with the DRAFT Local Government Operations Protocol to resolve the public transportation GHG displacement issue. In addition, we would like the transit operations component universally applied to other Protocols and future local protocols.

Best regards,



Melanie Simmons PhD
Director, FSU Healthy Communities Program