



**SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT**  
 2150 Webster Street, P.O. Box 12688  
 Oakland, CA 94604-2688  
 (510) 464-6000

2023

June 5<sup>th</sup>, 2023  
 California Air Resources Board  
 1001 I Street  
 Sacramento, CA 95814

Janice Li  
 PRESIDENT

Mark Foley  
 VICE-PRESIDENT

Robert Powers  
 GENERAL MANAGER

**RE: Auto-Acceleration Mechanism for the Low Carbon Fuel Standard**

Dear Air Resources Board Staff,

DIRECTORS

Debora Allen  
 1ST DISTRICT

Mark Foley  
 2ND DISTRICT

Rebecca Saltzman  
 3rd DISTRICT

Robert Raburn, Ph.D.  
 4TH DISTRICT

John McPartland  
 5TH DISTRICT

Elizabeth Ames  
 6TH DISTRICT

Lateefah Simon  
 7TH DISTRICT

Janice Li  
 8TH DISTRICT

Bevan Duffy  
 9TH DISTRICT

Thank you for the opportunity to provide comments on Potential Future Changes to the LCFS Program. The San Francisco Bay Area Rapid Transit District (BART) is a strong and steadfast supporter of the LCFS program. BART owns and operates an electrified fixed-guideway transit system and has participated as an opt-in entity within the LCFS since 2016. The vast majority of BART trains are 100% electric, with over 95% of its electricity supplied from zero-carbon sources including solar, wind, and hydroelectric generators.

We thank California Air Resources Board (CARB) staff for conducting its recent Public Workshop on potential future changes to the LCFS program, as well as the contributing stakeholders from UC Davis, AJW, Low Carbon Fuels Coalition, and BTR Energy.

BART strongly supports an expeditious approach in implementing the Acceleration Mechanism that will be supportive of the LCFS Program’s ambitious climate goals. BART appreciates CARB’s willingness to respond to market signals in the short to medium term whilst also taking steps to bolster the LCFS Program’s long-term stability and effectiveness.

A healthy LCFS Program will enable the continued investment in BART’s fixed-guideway system, as well as day-to-day operational expenditures required to maintain safe, reliable, and affordable transit service for Californians and its visitors. Currently, proceeds generated from LCFS credit sales are reinvested into BART’s system per BART’s Board-adopted LCFS policy. This includes direct support for sustainability-oriented capital projects and annual operating budgets. Given its role as an operator of a public transit system relying on over 95% GHG-free electricity to power its system, BART is closely aligned with the goals of the LCFS regulation and California’s broader objectives to decarbonize its transportation sector and reduce vehicle miles traveled. As a substitute for driving, pre-pandemic BART served over half of the transit passenger miles traveled in the nine county Bay Area. Thank you for the opportunity to provide comments on potential changes to the LCFS program. We look forward to continuing our work together to support California’s robust climate goals.

Sincerely,

Monica Meagher  
 Group Manager, Sustainability

[www.bart.gov](http://www.bart.gov)