

Sara Gerson

One issue I would like to raise that you did not have a chance to discuss yet today is the opportunity to improve support from the clean fuel standard for transit agencies by making a similar amendment to your rule to what the California Low Carbon Fuel Standard incorporated in its most recent amendments by which it allowed all fixed guideway systems to earn full credits aligned with their EERs, regardless of when the systems were built.

This is a great way to increase support for transit agencies when they really need that additional funding to increase their capacity, increase their service when they're facing a lot of fiscal difficulties. And these systems are providing a real GHG benefit regardless of when they were billed, that should be credited accordingly. So thank you so much for the consideration.