



April 12, 2022

Honorable Gary Gensler  
Chairman  
US Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

RE: S7-10-22 Enhancement and Standardization of Climate Related Disclosures for Investors

Dear Chairman Gensler:

On behalf of the Association for Commuter Transportation (ACT), I am writing to provide our support of the Security and Exchange Commission's (SEC) proposed rule S7-10-22 Enhancement and Standardization of Climate Related Disclosure for Investors. ACT is a professional trade association representing 1,350+ members across the country, including local governments, Metropolitan Planning Organizations, major employers, universities, NGOs, transportation service providers, and other stakeholders, focused on advancing transportation demand management initiatives to increase the efficiency of our transportation systems, improve mobility options for all people, and reduce harmful emissions from vehicles.

In 2019, 29% of total U.S. Greenhouse Gas emissions originated from transportation. In fact, the transportation sector represents the largest source of greenhouse gas emissions in the US. The Environmental Protection Agency found that, "[t]he largest sources of transportation greenhouse gas emissions in 2019 were light-duty vehicles (58% percent)."

A significant source of these emissions can be directly attributed to employee commute trips, business customers, and fleet operations of public companies. Requiring public companies to measure and report these emissions to investors will lead to positive action to reduce these emissions. While there may be hesitancy from some, we know that many public and private companies are currently collecting and reporting this information. This has led companies to deploy transportation demand management (TDM) strategies to reduce their vehicle emissions. Strategies that include the provision of transit passes to employees, locating offices near public transit, providing first mile/last mile shuttles, along with many other services and programs aimed at reducing drive alone vehicle trips and their emissions.

We appreciate the SEC's proposal hope to see it advanced.

Sincerely,

A handwritten signature in black ink that reads "David Straus". The signature is written in a cursive, flowing style.

David Straus  
Executive Director