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December 10, 2008

Chair Mary Nichols
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

ORIGINAL:
Copies:

Field Clerk
Executive Officer
Chair

RE: AB32 Scoping Plan Comments

Dear Chair Nichols:

The Sonoma County Transportation Authority appreciates the opportunity to comment on the California Air Resources Board's (CARB) Proposed AB 32 Climate Change Scoping Plan. The SCTA seeks to ensure that transportation projects can be successfully implemented that provide the multiple benefits of economic development, improving quality of life and meeting state and federal environmental goals.

While mindful of all the comments submitted by various transportation agencies and advocates throughout this process, we would like to bring to your attention two specific additional comments for consideration in the Proposed Scoping Plan.

- **Support the securitization of existing funding levels of state transit funding and dedicate new sources to accommodate modal shift.** While the Proposed Scoping Plan's overall policy goals support and encourage a shift toward more transit-oriented communities and acknowledges the necessity of a secure source of transit funding, it fails to acknowledge the state's continued raid of transit funding to balance the budget. A significant state role in transit funding is critical to meeting the statutory goals of AB 32 and SB 375 and the need to protect such funding sources should to be acknowledged in the plan. Additionally, the plan should acknowledge that a modal shift will place a greater burden on transit systems necessitating a dedicated, secure and sustainable funding source to accommodate this shift.
- **Credit for emission reductions achieved through bond funded projects should belong to the local implementing entity.** Local jurisdictions are contributing the majority of funding for these transportation projects through local matching funds, in addition to other expenditures for planning, environmental reviews, and engineering. Assigning credit of GHG emission reductions achieved through these projects entirely to the state ignores the role of local agencies in implementing these emission reducing projects and decreases the ability to reach regional GHG targets. The Plan should consider the option of crediting GHG reductions proportionally based upon the funding contribution of each entity.

The SCTA looks forward to partnering with CARB on implementation of the plan and on integrating implementation of the Scoping Plan with the SB 375 process. Such a partnership between CARB and local transportation agencies will ensure the goals of AB 32 and SB 375 can be successfully met and transportation agencies can continue implementing transportation projects efficiently and effectively.

Sincerely,

A handwritten signature in cursive script, appearing to read "Suzanne Smith".

Suzanne Smith
Executive Director, SCTA