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November 19, 2008

Mr. Robert Duvall
California Air Resourced Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

RE: AB 32 Proposed Scoping Plan

Dear Mr. Duvall:

Parking policies play a key role in shaping development patterns in communities throughout the Bay Area — and have a major impact on the quality and feasibility of transit-oriented development. Excessive and under-priced parking can drive up the cost of development and undermine the use of other travel modes — especially walking and transit — even in areas with high-quality transit and pedestrian amenities provided at considerable public expense.

The AB 32 Proposed scoping plan recognizes the need for local parking policies to reduce vehicle trips while preserving local mobility. We understand that these policies, along with several others, will be important to implement in order to meet the proposed Regional Transportation-Related Greenhouse Gas Target established in the proposed scoping plan.

We think that the state can lead by example in developing parking policies. Specifically, we would ask that, as part of the scoping plan, CARB would study and consider a state policy that discourages public subsidies for parking structures without first evaluating the environmental benefits of alternative means of transportation such as expanded bus service, shuttles and bicycling facilities, and alternative policies such as full user payments for the capital and operating cost of parking infrastructure. In addition, we would ask for consideration of a policy that prohibits subsidies for parking for employees (i.e., free or discounted parking) without comparable subsidies for transit, or other modes, or an option for employees to cash-out the parking benefit.

Thank you for you consideration of this proposal. If you have any questions about the request, please feel free to contact me at dkimsey@mtc.ca.gov.

Sincerely,

Doug Kimsey

Doug Kimsey
Planning Director

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