



April 28, 2014  
 Mary Nichols  
 California Air Resources Board  
 1001 "I" Street  
 Sacramento, CA 95814



**Re: Bay Area Congestion Management Association Comments on Scoping Plan Update**

Dear Ms. Nichols



Thank you for the opportunity to comment on CARB's first update of the AB 32 Scoping Plan, ("Plan Update"). The Bay Area Congestion Management Agency (CMA) Association represents the nine county transportation agencies (sales tax authorities and congestion management agencies) that are investing in projects and programs that create accessible, convenient, equitable and sustainable transportation to move people and goods, spur economic growth and enrich communities. The nine Bay Area CMAs plan, fund and deliver almost \$1 billion each year for projects and programs that support the Bay Area's economy and help move over 7 million people each day. We are also responsible for assisting with the implementation of the Bay Area's Sustainable Communities Strategy (SCS) that supports implementation of SB 375.



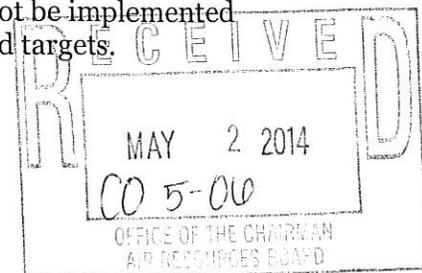
The Bay Area CMA Association supports the *Plan Update* recommendations for multimodal investments that support Sustainable Communities and Passenger Transport, Sustainable Freight/Goods Movement and Energy/Fuels and Innovative Technologies. Our long-range plans similarly support multimodal systems. In order to advance the implementation of these priorities to support GHG reductions throughout the state, the Bay Area CMA Association makes the following overall comments on the *Plan Update* with the goal of reducing GHG emissions from transportation:



***Significant funding is needed now to implement transportation investments that reduce GHG emissions.***



The *Plan Update's* recommendations include the implementation of Sustainable Communities Strategies that provide a range of mobility choices and support zero or near zero emission technologies. The CMA Association recognizes that we must transition into new technologies and new ways of linking land use and transportation to support the state's GHG reduction goals. This will take time; however, the most efficient way for the transportation industry to achieve its GHG reduction target is to provide significant and reliable funding sources now to move the Bay Area SCS from a plan into implementation. Per Governor Brown's Executive Order Executive Order B-16-2012, which specifically requires an 80 percent GHG reduction from the transportation sector, an up-front investment in infrastructure and development incentives to realize GHG emission reductions is essential. Without a significant commitment of funds this work cannot be implemented in a timely way to support the GHG reduction timelines and targets.



***Direct significant Cap and Trade revenues to transportation investments and Administer these funds at the regional level***

The State's new Cap and Trade program represents one of the most promising opportunities for investing in transportation strategies that support GHG reductions. Given that the transportation sector accounts for 40% of State GHG emissions, the Bay Area CMA Association supports directing a significant portion of Cap and Trade revenues to transportation investments.

The Bay Area CMA Association appreciates CARB's recognition of regional planning and local leadership in development of SCSs and the importance of supporting efforts both locally and regionally to implement these plans. In keeping with this key recommendation in the *Plan Update*, we recommend that CARB support that state funding for GHG reductions related to SCS implementation be administered at the regional level.

***Support successful planning and investment strategies delivered by the regions and local agencies.***

The nine Bay Area CMAs deliver almost \$1 billion each year for projects and programs that support the Bay Area's economy and mobility and reduce GHG emissions through cutting-edge transportation efforts such as:

- Bicycle and pedestrian infrastructure and programs
- Clean fuels and new technologies
- Highway/roadway improvements to reduce congestion and support goods movement
- Mass transit operations and capital investments
- Transportation Demand Management programs
- Transit oriented development
- Senior and disabled transportation

Bay Area voters have approved local transportation measures that fund these investments. We are held accountable to strict delivery timelines through open and public processes and we report regularly to the public on how funds are expended. This accountability has resulted in significant investments that reduce congestion, improve access and efficiencies, and create safe, efficient and clean transportation systems. Recognizing and rewarding the efficiency and effectiveness of our delivery processes by directing funds and administration authority to regions and local agencies will enable the State to advance its GHG reduction goals.

The Bay Area CMA Association appreciates your efforts on the AB 32 Scoping Plan Update, which will greatly influence transportation, goods movement, fuels, and infrastructure in California and change the way we perceive and address energy efficiency, waste, water, and agriculture, as well as protect our natural resources and enrich communities throughout California. We see investment in the transportation sector as a key strategy to meet the State's ambitious GHG reduction goals.

Sincerely,

Daryl Halls  
Bay Area CMA Association Moderator

cc.  
Bay Area CMA Executive Directors