



October 29, 2013

Mary Nichols, Chairperson
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chairperson Nichols:

On behalf of the Board of Directors of the Santa Clara Valley Transportation Authority (VTA), I am writing to respectfully request that the California Air Resources Board (CARB) consider incorporating the key elements of the proposal offered by the Transportation Coalition for Livable Communities for the Cap-and-Trade Auction Proceeds Investment Plan into the update of the AB 32 Scoping Plan.

The Coalition's proposal is based on the principle that auction proceeds derived from vehicle fuels should be used to fund transportation system needs in a way that achieves AB 32 objectives, and that builds on the framework of SB 375 and other greenhouse gas emissions reduction strategies. The Coalition's proposal embodies the key concepts of: (1) favoring integrated transportation and land-use strategies; (2) selecting projects at the regional level utilizing statewide criteria; (3) allowing flexibility at the local level to develop the most cost-effective projects; and (4) assisting local agencies in implementing regional Sustainability Communities Strategies pursuant to SB 375.

SB 375 will contribute significantly to achieving the goals of the AB 32 Scoping Plan Update, if this legislation is implemented to its full potential. The critical component lacking is a funding mechanism tied to SB 375 to ensure that we are able to move beyond plans to full implementation. Cap-and-trade auction proceeds derived from vehicle fuels would be a key revenue source for this purpose and for creating a transportation system with a significantly lower carbon footprint than the one we have today. The Transportation Coalition for Livable Communities has put forward a plan for spending these proceeds in a way that would incentivize improved land use and a more efficient transportation system, while achieving the most cost-effective greenhouse gas emissions reductions from the transportation sector.

VTA hopes that CARB will give serious consideration to incorporating the key elements of the Coalition's proposal into its update of the AB 32 Scoping Plan. Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Joe Pirzynski".

Joe Pirzynski, Chairperson
Board of Directors
Santa Clara Valley Transportation Authority