

December 9, 2008

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

Dear Chair Nichols, Board Members, and Staff:

The Regional Transportation Planning Agencies (RTPAs) appreciate the opportunity to comment on the California Air Resources Board's (CARB) Proposed AB 32 Climate Change Scoping Plan. California's 43 RTPAs seek 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 the previous comments submitted by the RTPAs on August 13th, we would like to bring to your attention to these additional comments for inclusion 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 regional transportation plans analyze the cumulative impact of all land use decisions and transportation projects based upon overall anticipated funding without regard to the funding source and separating out specific projects requires an analysis of what would happen without those projects but must include how the funding that went to those projects would otherwise be spent. Accordingly this policy is unworkable if applied to regional transportation planning. We ask that this be clarified. If this does apply to regional transportation planning, the Plan should consider the option of crediting GHG reductions proportionally based upon the funding contribution of each entity.

The RTPAs look forward to partnering with CARB on implementation of plan. RTPAs representing different areas of the state should be included as key representatives on the

Regional Targets Advisory Committee to ensure integrated implementation of the Scoping Plan with the SB 375 process. Through this partnership, the RTPAs hope that a workable framework can be developed whereby the goals of AB 32 and SB 375 can be successfully met and transportation agencies can continue implementing transportation projects efficiently and effectively. Please contact Timothy Papandreou at (213) 922-2281 or Wendy Villa of OCTA at 714-560-5595 if you have any questions.

Sincerely,

Rachel Moriconi
Moderator 2008/09
California Regional Transportation Planning Agencies