

CALIFORNIA'S REGIONAL TRANSPORTATION PLANNING AGENCIES

August 13, 2008

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

Re: RTPA comments to the AB 32 Draft Scoping Plan

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) Draft AB 32 Scoping Plan (Plan) to reduce the state's greenhouse gas (GHG) emissions. California's 43 RTPAs have a proud history of partnering with local, regional, state and federal authorities and key stakeholders to plan, program, design, implement and operate the multi-modal transportation infrastructure and programs throughout the state. The successful outcomes of these projects and programs rely on these partnerships with the common purpose of improving our quality of life and economic development while meeting state and federal environmental requirements. In order to continue these successful outcomes, the RTPAs urge CARB to incorporate the following policy recommendations into the Final Scoping Plan document:

- ***Include non-MPO Regional Transportation Planning Agencies in the Regional Targets Advisory Committee.*** While some of the 17 metropolitan planning organizations in the state are also designated as regional transportation planning agencies, it is important to ensure that non-MPO regional transportation planning agencies are also involved in developing greenhouse gas emission reduction targets.
- ***Separate Local Government Actions and Clarify Regional GHG Targets.*** Studies show that local land use decisions that support travel demand management increase the viability of alternative modes and provide the greatest multiple benefits for regional GHG emissions, air pollution and improved performance of the state's regional transportation systems. California's RTPAs are highly diverse in their scope of responsibilities yet cannot impose these actions on local governments. A one-size-fits-all approach may not be feasible, therefore the RTPAs recommend CARB work with local governments to develop land-use strategies that support the reduction of GHG emissions and allow the region's the flexibility to determine the appropriate measures to reach the targets.
- ***Ensure AB 32 Actions Do Not Erode Existing Transportation Funding Base.*** While significant transportation funds are generated by local sales tax measures in some regions, the majority of transportation funding is derived from the state and federal gasoline tax. Incentives to reduce consumption of taxable fuels will reduce GHG emissions on the one hand, however, run the risk of reducing the very fund source that the RTPAs and Department of Transportation (Caltrans) depend on to develop and maintain transportation infrastructure on the other. RTPAs recommend that CARB evaluate the impact of AB 32 actions on transportation funding levels and develop a plan to supplement lost revenues.
- ***Recognize the Role of Public Transportation.*** With the Plan's multiple policies directed at reducing travel demand and increasing the use of alternative modes of transportation, reliable funding for transit is needed. Transit operators are already experiencing a tremendous financial burden due to record transit ridership levels, state budgetary cuts in transit operations and the pending zero emission CARB rules for transit vehicles. RTPAs recommend that the plan recognize that public transit provides a significant role in reducing the growth of regional GHG emissions and dedicate new revenues created under AB 32 for transit capital and operations.
- ***Dedicate Revenues from Market Mechanisms Implemented Under AB 32 for Transportation Projects.*** Future policies directed at reducing GHG emissions hold a lot of challenges and

opportunities for the transportation sector. The RTPAs recommend that CARB develop a framework for the use and allocation of new revenues created under AB 32 for multi-modal transportation projects and programs that provide GHG emission reductions.

- **Update and Coordinate Modeling Tools among State Agencies.** Due to the various cumulative inputs that result in GHG emission reductions, the state forecasting and modeling tools from Caltrans, California Energy Commission, CARB and other agencies need to be better coordinated and updated to assist RTPAs in determining the best practices for GHG mitigation and reductions, multi-modal performance analysis and climate change adaptation. The RTPAs recommend that the Plan dedicate revenues to update regional models to incorporate energy, non-motorized transportation, land-use and other inputs to effectively determine GHG emission performance.
- **Incorporate GHG Traffic Mitigations and Adaptation in California Environmental Quality Act.** Currently, CEQA does not adequately address GHG emissions which leave RTPAs vulnerable to legal challenges as they proceed through environmental clearance. In addition, the current acceptable CEQA practice of mitigating traffic impacts in most local governments is to add more road capacity which may contradict the intent of AB 32 to reduce GHG emissions. The RTPAs recommend CARB work with the Office of Planning and Research and other key stakeholders to address GHG emissions analysis in CEQA, allow regional transportation projects be evaluated on a regional programmatic level (Regional Transportation Plan or equivalent) and include demand management and non-motorized best practices as acceptable local traffic mitigations.
- **Establish Comprehensive Education, Outreach and Staff Training Opportunities.** Regional Transportation Planning Agencies, Metropolitan Planning Organizations and local governments will need specific education and outreach tools to disseminate information to their diverse public audiences and staff training will be needed to analyze, design, develop and implement best practice GHG emissions reductions.

To continue this spirit of successful partnerships and to plan toward the global consensus of an 80% reduction in GHG emission reductions by 2050, the RTPAs would like to invite CARB staff to work in partnership to develop the needed tools, incentives, frameworks and resources for local governments and public agencies to effectively and efficiently meet the intent of AB 32 and beyond. Please contact Timothy Papandreou at 213 922 2281 or me at 831-460-3203 if you have any questions.

Sincerely,



Rachel Moriconi

Moderator

California Regional Transportation Planning Agencies