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AGC of America
THE ASSOCIATED GENERAL CONTRACTORS OF AMERICA
Quality People. Quality Projects.



June 4, 2008

The Honorable Daniel Akaka
United States Senate
141 Hart Senate Office Building
Washington, DC 20510

Dear Senator Akaka:

On behalf of the Associated General Contractors of America (AGC), I am writing in opposition to a provision in the substitute amendment to be offered by Senator Barbara Boxer to S. 3036, the Climate Security Act, which would grant the U.S. Environmental Protection Agency (EPA) new and unprecedented authority over states' transportation programs.

Specifically, the Boxer substitute establishes a new set of transportation planning process requirements and requires that EPA approve or certify states' "statewide transportation plans" as a condition for using the \$171 billion from the new "Transportation Sector Emission Reduction Fund" established under the bill for transit and other transportation projects.

Currently, the U.S. Department of Transportation (DOT) oversees the statewide transportation planning process; this oversight is appropriate and sufficient. Any funding made available for transportation projects and strategies to reduce greenhouse gases should go through the existing transportation planning processes under Titles 23 and 49. If any modifications to the transportation planning process are needed to address climate change issues, then Congress should consider them in the proper context of the surface transportation reauthorization scheduled for 2009.

Moreover, Congress should consider in the context of climate change legislation the greenhouse gas reduction benefits that can be derived from congestion relief projects. Improving the nation's most severely congested highway bottlenecks, according to a study by the American Highway Users Alliance, would reduce carbon dioxide (CO₂) emissions by as much as 77 percent and conserve more than 40 billion gallons on fuel over a 20-year period, as well as lead to reduced levels of other harmful emissions.

Furthermore, as debate over how to address climate change continues, it is important to point out that increased vehicle miles traveled (VMT) are not the problem. VMT growth does not equate to increased emissions. Over the past 30 years, VMT has grown by over 150 percent, while levels of volatile organic compounds (VOCs) and nitrous oxides (NO_x), which are precursors to ozone and are associated with greenhouse gases and climate change, have decreased 73 percent and 41 percent, respectively. This is due largely to technological advances in motor vehicles and fuels.


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While AGC believes that additional funding for transit and other transportation projects can significantly reduce greenhouse gas emissions, AGC also believes that significant greenhouse gas emission reductions can be achieved through improvements to severely congested highway bottlenecks. Thus, AGC urges Congress to include specific funding to reduce congestion on the nation's highways as part of any strategy to address climate change.

Again, AGC urges your opposition to any new statewide transportation planning processes that require new and unprecedented federal oversight as part of the Senate climate change legislation and to consider the greenhouse emission reduction benefits of reducing highway congestion.

Thank you for your consideration of our views.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey D. Shoaf". The signature is fluid and cursive, with a large initial "J" and "S".

Jeffrey D. Shoaf
Senior Executive Director
Government and Public Affairs