



AMERICAN COUNCIL OF ENGINEERING COMPANIES

DAVID A. RAYMOND
PRESIDENT & CEO

June 5, 2008

Dear Senator:

On behalf of the American Council of Engineering Companies (ACEC) – the business association of the nation’s engineering industry – I wanted to alert you to the Council’s concerns over provisions under consideration as part of the climate change bill (S. 3036) that will add an unnecessary and burdensome layer of regulation over future transportation projects.

ACEC supports the transportation investments included in the legislation, which will spur improvements in our nation’s transit systems. However we are concerned that these funding provisions move away from well-established processes for reviewing and financing surface transportation projects, and may also fall short of addressing other transportation improvements that will enhance air quality.

First, provisions in the bill establish a new set of transportation planning requirements requiring certification of the “Statewide transportation plan” by the U.S. Environmental Protection Agency (EPA) as a condition for using the funds in the “Transportation Sector Emission Reduction Fund.”

As you know, transportation priorities and projects are already governed by well-established planning processes. We believe that adding an additional layer of EPA oversight or regulatory authority is unnecessary and will only add more time to an already lengthy planning and project development process. We would encourage the Senate to reject these provisions, and clarify instead that projects funded through revenues generated under the bill be governed by the planning rules already in effect.

Second, we would urge the Senate to broaden the list of projects eligible for funding under the bill. While the expansion of public transit options and operations is important, additional highway capacity is essential for reducing congestion. The nation’s road system is not keeping up with growth in system usage, resulting in an ever-growing congestion problem which wastes fuel and results in greater emissions of harmful pollutants. Targeted highway capacity improvements will help to address this challenge – we urge you to make these eligible for funding under the bill.

Thank you for your consideration on these important issues.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Raymond", written in a cursive style.