SPUR SAN FRANCISCO PLANNING + URBAN RESEARCH ASSOCIATION

312 Sutter Street, Suite 500
San Francisco, California
94108-4305

t.415.781.8726
f.415.781.7291

www.spur.org

Co-Chairs
Andy Barnes
Tom Hart

Executive Director
Gabriel Metcalf

Urban Center Director
Diane Filippi

Vice Chairs
Lisa Feldstein
Anne Halsted
Jim Salinas, Sr.
Libby Seifel

Treasurer
Terry Micheau

Secretary
Jean Fraser

Immediate Past Chair
Vince Hoenigman

Advisory Council
Co-Chairs
Michael Wilmar
Paul Sedway

Board Members
Michael Alexander
Jim Andrew, Jr.
David Baker
Lee Blitch
Margo Bradish
Pam Brewster
Laurence Burnett
Michaela Cassidy
Claudine Cheng
Julienne Christensen
Emilio Cruz
Charmaine Curtis
Gia Daniller
Kelly Dearman
Luisa Ezquerro
Linda Jo Fitz
Frank Fudem
Robert Gamble
Gillian Gillett
Chris Gruwell
Dave Hartley
Travis Kiyota
Patricia Klitgaard
Rik Kunnath
Jim Lazarus
Ellen Lou
John Madden
Jacinta McCann
Mary McCue
John McNulty
Chris Meany
Ezra Mersey
Peter Mezey
Sandy Mori
Leroy Morishita
Dick Morten
Brian O'Neill
Paul Okamoto
Chris Poland
Teresa Rea
Byron Rhett
Bill Rosetti
Nicole Sawaya
Victor Seeto
Chi-Hsin Shao
Raphael Sperry
Bill Stotler
Stephen Taber
Lydia Tan
Michael Teitz
Michael Thériault
James Tracy
Jeff Tumlin
Brooks Walker, III
Debra Walker
George Williams
Paul Zeger

December 9, 2008

Mary Nichols
Chair
California Air Resources Board
Sacramento, CA 95814-2719

Dear Chair Nichols:

Thank you for the opportunity to comment on the proposed scoping plan for AB 32. San Francisco Planning + Urban Research Association (SPUR), established in 1959, is a nonprofit organization that uses research, education, and advocacy to promote good planning and good government. We have been following the AB 32 scoping process as a member of ClimatePlan, a coalition that views good land use planning as an essential strategy to meeting AB 32 emissions reduction goals. Today, **we urge you to significantly raise the target for the regional transportation sector** from 5 MMT to 11-14 MMT. We also implore you to do whatever you can to **preserve and expand funding for public transit.** Reductions will not occur without increased public transit ridership, which will not occur without better and more comprehensive public transit options.

Unless the land use and regional transportation targets set by CARB are ambitious, yet achievable, no meaningful change will occur in the way local and regional agencies make land use decisions in 2020. The unfortunate reality of this scenario is that VMT will continue to climb, and California will not meet its transportation emissions targets, despite our best efforts to regulate vehicle emissions and fuels. A low target, moreover, could subvert the potential of SB 375, our newly minted strategy for local governments and transportation agencies to reduce emissions through good planning. To put the scale of the proposed 5 MMT target in perspective, the City of San Francisco alone is working to reduce emissions 2.5 MMT annually from 2000 levels by 2012. Just under 1 million of these tons are expected to be achieved from the transportation sector, constituting 20% of the expectations for the entire State of California under CARB's proposed scoping plan.

However, a study conducted by smart growth expert Dr. Reid Ewing et al. revealed 11-14 MMT is achievable and even conservative, given expected future gasoline prices, the interregional jobs-housing balance corrections that will occur under SB 375, and VMT reductions expected from existing development. 11-14 MMT translates into a per-driver VMT reduction of less than 4 miles a day. **A land use and transportation emissions reduction strategy that is based on small per-driver VMT reductions is not anti-growth.** Rather, it promotes growth in the places that give people choices, allowing them to take advantage of other modes of travel, such as transit, walking, and bicycling.

To that end, we recommend that the Scoping Plan include a meaningful plan for increasing funding for transit and other transportation improvements. Voters overwhelmingly approved State and local transit funding measures on the ballot this fall, showing willingness to invest in transit infrastructure even in an economic downturn. **We encourage CARB to find ways to protect and increase funding for transit investments and operations**, as well as to support innovative programs that have a proven impact on reducing emissions and VMT, including as feebates, congestion pricing, and incentives for mode shifts.

A higher land use target, coupled with CARB's commitment to securing additional financial resources, and providing technical assistance for local governments and regional agencies, is what we need now to fight climate change through smart growth. With your leadership, local governments will get the message, and be encouraged to make decisive and bold planning decisions that translate California's climate goals into reality.

Sincerely,

Laura Tam
Sustainable Development Policy Director