

RE: Higher priority for VMT reductions in the AB 32 Scoping Plan

Dear Ms. Nichors:

The City of Benicia applauds the California Air Resources Board for its tremendous dedication and effort to develop the proposed Scoping Plan as a key step forward toward implementing AB 32 and creating a more sustainable energy economy. As a local government that has promoted smart growth and supported local actions to reduce greenhouse gases, I urge you to establish stronger statewide targets to reduce vehicle miles traveled (VMT) and work closely with local governments to establish strong regional targets for greenhouse gas reduction through the SB 375 process. Both a strong state target and strong regional targets are needed to ensure the highest priority and attention is paid to shifting land use patterns to reduce driving, and to creating healthier communities with more transportation alternatives including walking, biking and public transit.

The new scoping plan will encourage local governments to adopt a specific goal of reducing greenhouse gases -15% below today's levels by 2020. With current growth and development patterns, VMT is expected to increase by 70% over the next 30 years. If this level of growth in vehicle use continues, it would cancel out progress made in reducing greenhouse gas emissions through introduction of cleaner vehicles and fuels. Stronger local targets are needed to ensure we will meet our regional and statewide goals.

Additionally, although the proposed plan has a slightly strengthened goal of achieving 5 million metric tons of greenhouse gas reductions from VMT reduction, that goal is still far too low. The state should set a higher goal of at least 10 million metric tons and provide the leadership and support to help local governments change land use and transportation patterns to achieve the goal as quickly as possible. Support to local governments should include technical and financial assistance and guidance documents to assist local governments in implementing changes to reduce greenhouse gases from transportation and land use, as well as other sectors, including energy and recycling.

Recycled Paper

JIM ERICKSON, City Manager TEDDIE BIDOU, City Treasurer LISA WOLFE, City Clerk Rising gas prices already are causing many Californians to rethink their attitudes towards car use and the locations of their homes and jobs. The ARB's Scoping Plan could reinforce these fundamental shifts in people's thinking by including stronger incentives to promote mixed-use neighborhoods near transit, building homes near job centers, and expanding transit and other alternatives to individual driving.

With asthma at epidemic levels and thousands of premature deaths, hospitalizations and illnesses caused by air pollution each year, California must take strong action. In summary, I recommend the following changes to the scoping plan:

- Work closely with local governments to establish strong regional targets for greenhouse gas reduction through the SB 375 process
- Set higher goal of 10 million metric tons in greenhouse gas reductions to be achieved from vehicle miles traveled
- Provide technical and financial assistance and guidance documents to assist local governments in reducing greenhouse gases from transportation and land use, as well as other sectors, including energy and recycling.

I look forward to working with you to achieve regional and statewide greenhouse gas reduction goals as quickly as possible. Thank you for your consideration.

Sincerely, Alus Elizabeth Patterson Mayor

cc: Each Member of the California Air Resources Board