

November 13, 2008



California Air Resources Board:

The Safe Routes to School National Partnership (SRTSNP) which includes more than 350 partner agencies nationwide, with more than 30 in California, is pleased to have the opportunity to submit comments on the California Air Resources Board's (ARB) final Scoping Plan for AB32, which should reduce greenhouse gas emissions in the State of California to 1990 levels by the year 2020.

Our comments focus on the transportation sector, which accounts for approximately 38% of greenhouse gas emissions in the State of California. We applaud the Scoping Plan, which is a substantial improvement over the June 2008 draft with its recommendations for higher targets for land use, coordination with SB375, and a 15% reduction goal for local governments. However, a more ambitious target for the land use goal (in the range of 11-14 MMT) is needed for our growing state; SRTSNP is also encouraging ARB to utilize a better suite of tools to help local regions and the state reach your goals.

The SRTSNP fully support the goals brought forth by ClimatePlan in their letters to ARB, and via this letter, we are writing to expand on recommendations for how Safe Routes to School and school siting can and should be included in the final AB32 Scoping Plan.

1) **Reducing VMT:** On page 48-49 of the Scoping Plan, there is a bulleted list of policies and strategies which regions can use to implement SB 375, and the third bullet begins ". . . programs to reduce vehicle trips while preserving personal mobility such as employee transit incentives. . .". SRTSNP recommends that Safe Routes to School be mentioned specifically as a program that can reduce vehicle trips in this section.

2) **Public Education and Programs:** We also request that ARB explicitly include Safe Routes to School infrastructure and non-infrastructure programs in the section of the Scoping Plan on page 49 titled "public education and programs to reduce vehicle miles traveled." The State has funded a state Safe Routes to School (SR2S) program at an average of \$24.25 million/year for the past seven years, but those allocations are now part of the volatile state budget process. The AB32 Scoping Plan should call for the SR2S program to be funded on an ongoing basis at a level of \$90 million dollars (2007 dollars) per year, which would be matched by federal and local dollars, for a total Safe Routes expenditure of \$180 million annually. This would enable 100% of schools in the state to receive SR2S education and encouragement programs, starting in 2010. This would also fund an infrastructure improvement rollout where each school in the state would receive bicycle and pedestrian safety improvements over a 25-year time period, with 4% of the schools in the state receiving the construction improvements each year. As indicated in our July 2008 where we extrapolated local carbon reduction

emissions to the statewide level, over the 25 year time period, SR2S would be expected to reduce between 7.5 million and 10.3 million aggregate tons of CO₂.

3) **School Siting:** We respectfully request that ARB work with the California Department of Education (CDE) on the revision of their school siting requirements (Title 5), which are being updated now. Through the implementation plan, ARB should specifically mention the importance of school siting and community-centered schools within the final Scoping Plan. The National Household Travel Survey indicates that only 42% of school trips are one mile or less in California. As we are building and rebuilding more schools in this state, it will be important to ensure that these new schools are neighborhood schools, where children can safely walk and bicycle. As an example of why this is important, parents at six elementary schools in the Natomas Unified School District were sent a transportation mode survey at the beginning of the 2004 school year. The results showed that walking to school decreases quickly as distance to school increases. For example, 60% of children living 1/4 of a mile or less from one of the surveyed schools were walking in contrast with only 5% of children living 1-2 miles from school who were walking.

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Current growth patterns put California on a path that will result in a 50-70 percent increase in driving over the next 30 years. Such an increase in driving would cancel out the emissions benefits of improved fuel economy and low carbon fuels. It is imperative that the state provide strong leadership and encourage local and regional governments to adopt ambitious targets for greenhouse gas reductions.

Safe Routes to School and school siting are important issues to include within the scoping plan both for funding allocations through the cap and trade program, and as requirements for the regional target plans. Schools play a major role in how communities are designed, and how local traffic is generated, with its corresponding VMT and emissions. Working on Safe Routes to School and school siting issues to reduce VMT will help to ensure that ARB can reach GHG reduction targets, while also helping to change the habits of an entire generation.

Thank you for your careful consideration of our comments. We look forward to your reply, and to seeing the subsequent version of the Scoping Plan. Should you like to reach me, I'm available at 415-454-7430.

Best regards,



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