



July 30, 2008

California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

**RE: Comments on Draft AB 32 Scoping Plan Document**

The San Francisco Bike Coalition (SFBC) applauds the significant work that CARB has accomplished in preparing the draft Scoping Plan. We appreciate the opportunity to provide comments to this watershed document.

SFBC enthusiastically supports the overall effort and goals of this process. We have paid particular attention to the recommendations made in the Transportation and Local Government Actions sections of the Scoping Plan. In addition, we strongly support all of the "Other Measures Under Evaluation" for the transportation sector: feebates, congestion pricing, pay as you drive insurance, indirect source rules for new development, and public education and programs to reduce vehicle travel (p.37-38). These measures are essential to meet the aggressive statewide emission reduction requirements. While we applaud the inclusion of these measures, we believe the current emission reduction estimates are extremely conservative (Table 22, p.40). We believe creating a marketplace that values greenhouse gas emissions will strongly affect consumer behavior and purchases significantly different than business as usual.

Using these "other" measures, we see significant potential to further reduce vehicle miles traveled (VMT) and to integrate land use and transportation planning (smart growth) to enable and bolster no- and low-emission transportation options. We believe that these two concepts need to be considered together in order to achieve the greatest possible statewide emissions savings.

We agree that we CARB's assessment that

*"... additional reductions can be achieved by making the connection between transportation and land use. This scenario reflects an increased emphasis on urban infill development: more mixed use communities, improved mobility options, and better designed suburban environments. (ARB Scoping Plan, p.33)*

SFBC recognizes, as does CARB, that many of these planning decisions are made at the local and regional levels. However, we think it is essential that the state demonstrate

leadership now in setting standards for transportation requirements associated with development (new or infill) and not wait until the next cycle of planning. Our experience indicates that people will walk, bike, and use public transportation in their communities if the options are available and safe. But these options require infrastructure to be developed with these transportation goals at the forefront rather than taking a distant backseat to automobile infrastructure.

SFBC works with local and regional entities to advocate for bicycling as an everyday mode of transportation. Through this work, we have seen the number of bicyclists increase substantially in San Francisco. Public education, safety and maintenance classes, continued advocacy, and infrastructure improvement are all critical elements of increasing the usage of no- and low-emitting transportation options. Infrastructure improvements include development of transportation corridors with bike lanes, sidewalks, greening of streets, appropriate lighting, vehicle speed limit reductions, and generally developing streets to be used by people rather than just automobiles.

In order to truly address the issue of reducing Vehicle Miles Traveled (VMT), alternatives need to be readily available and supported. Further land use and development (new or infill) needs to support no- or low-emitting transportation options. California cannot continue to grow and develop as it has and reach the goals required by AB32. While some of this work can be accomplished at the local and regional level, the state must play an important role. Similar to the energy efficiency requirements the state place on appliance manufacturers and the building trades, we need to have standards for transportation infrastructure, and indirect transportation emissions associated with land development (new and infill). We encourage action to be taken at the statewide level.

We strongly support CARB's efforts to ensure that the California Environmental Quality Act (CEQA) compliance requirements are adequate to uphold the intent of the law. We also support directing of some portion of potential revenues generated from the emission reduction measures to local governments:

*Incentives to local governments – Funding or other incentives to local governments for well-designed land-use planning and infrastructure projects can do much to discourage long commutes and encourage walking, bicycling and use of transit. (p.47-48)*

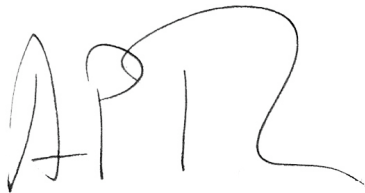
CARB correctly recognizes that measures like Congestion Charging, PAYD, and indirect source fees have a positive economic benefit and reduce greenhouse gas emissions. State government action is essential for at least most of these measures (congestion charging and pay-as-you-drive insurance, for instance), and these measures should be added to the proposed measures rather than included with those "under consideration". They will encourage bicycling, walking, and transit use.

To further facilitate this transition, CARB should auction 100% of all greenhouse gas emission allowances under a cap & trade system, or impose a carbon fee. For every \$1 price per ton (through either allowance sales or a carbon fee), there will be almost \$4 billions dollars in revenue over the 2012-2020 timeframe. Funding for transitioning to a cleaner and more efficient future is the most important priority for use of this revenue.

For the transportation sector share of those resources, priorities should include bicycle, pedestrian, and transit improvements in addition to targeting vehicle tailpipe emissions.

We appreciate the opportunity to comment on the Scoping Plan. We hope to provide further input into this important process.

Sincerely,

A handwritten signature in black ink, appearing to read 'APT' followed by a stylized flourish.

Andy Thornley  
Program Director  
San Francisco Bicycle Coalition

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