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*Breathe California of Sacramento-Emigrant Trails is dedicated to healthy air and preventing lung and other air-pollution related diseases by partnering with youth, advocating public policy, supporting air pollution research, and educating the public.*



August 6, 2008

Breathe California of Sacramento Emigrant Trails strongly supports the Draft Scoping Plan to reduce Carbon Dioxide emissions, implementing AB 32. Several measures in the Plan complement Breathe California of Sacramento Emigrant Trails clean air strategies to improve air quality throughout the region. Over 70% of our air pollution in this region comes from mobile sources. We believe it is critical to the health of our region to tackle the difficult issues linking transportation, urban land use design, and energy use to the emissions that also contribute to climate change. In light of the positive health and environmental benefits the Plan will bring to California, we submit the following recommendations.

### ***Vehicle Miles Travel (VMT) reduction strategies:***

Engaging the public through voluntary action is not enough. Much more attention needs to be given to concrete strategies to reduce VMT. Low carbon fuels and clean efficient engine technological advancements are only part of the solution. While these advancements show great promise, more R&D is still needed for the technology to deliver maximum benefit. In addition, clean engine technology is expensive and cost-prohibitive for many. Those that can not afford to upgrade and replace their older high emission cars for newer and cleaner engine cars will continue to drive older polluting vehicles. VMT reductions must be more than a voluntary action in the scoping plan. Real strategies and funding mechanisms must be developed. We suggest a whole section dedicated to VMT reductions.

California is under-funding public transit. A funding strategy must be included that supports regional transit plans throughout California. BCSET suggests implementing pricing strategies to discourage automobile travel. Revenue generating strategies could include Pay-As-You-Drive programs, carbon fees on gasoline purchases, congestion pricing, parking cash-out, and other practices proven to reduce driving and motivate behavior change. It is most important that funds generated from levied GHG emission taxes be used to develop and implement clean energy technology, transit alternatives, walkable/bikeable communities, complete streets, and sustaining affordable transit options and other benefits for the economically disadvantaged.

### ***Land Use:***

CARB must take the lead and set goals for regional transportation planners to reduce greenhouse gas emission through Regional Transportation Plans. SB 375 authored by Senator Darrell Steinberg is a good start. It requires the 18 metropolitan planning organizations (COGs) across the state to show that their future planning scenarios will result in a reduction in GHG emissions. The bill would require regions, not just individual cities and counties, to engage in a process to plan low-carbon smart growth communities by defining efficient sites for development, and GHG-absorbing land uses for protection, encouraging mixed use neighborhoods, density, and transportation planning and modeling best practices. Creating communities that are more compactly built and use space in an efficient but aesthetic manner will encourage more walking, biking, and public transit use, and result in shortened auto trips.

***Health Impacts:***

The Scoping Plan needs to be stronger from a public health perspective. The plan needs to develop measures that will not only address climate change, but will also have the biggest potential impact on obesity, chronic illness, and health inequities while, promoting walkable/ bikeable communities and public transit. The draft plan limits its public health assessment to asthma and respiratory disease from air pollution.

We need a fuller accounting of the potential public health benefits and costs, and a commitment to prioritize measures that address both greenhouse gas emission reductions and the health of our communities. This will require the public health community to be a full partner in the implementation process.



***Public Education and Outreach:***

The scoping plan should identify a program to provide data/information to individuals for use in evaluating purchasing decisions. The program should provide “cradle-to-grave” information on manufactured products. We suggest the following cradle-to-grave categories: construction/manufacturing, transportation, operation, and disposal. Data should be provided in common terms, using CO2e emissions to enable the purchaser to fully evaluate the total impact of the product. Data should be required, at a minimum, for motor vehicles and large appliances. Such information is vital to a consumer evaluating, for example, when to trade in a high mpg vehicle for an electric or hydrogen-based car.

The importance of “smart growth” land use for future reduction of CO2e is buried in the text of Appendix C and not reflected in either Table 10 Appendix C, or Table 17 of the Preliminary Recommendations. Most other reductions to CO2e emissions are linear, but failure to pursue smart growth, although difficult to quantify, has an increasingly high impact adverse impact in future years, and therefore a correspondingly higher benefit if it is recognized and implemented soon. The discussion warrants more emphasis in the Preliminary Recommendations section.

Thank you for the opportunity to comment on the Draft Scoping Plan. We look forward to working with the ARB on implementing the Plan.

Sincerely,

Rick Bettis, Policy Committee Chair

Annemarie Vincent, Sr. Policy Manager