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California Environmental Protection Agency
Air Resources Board
Headquarters Building
1001 "I" Street
P.O. Box 2851
Sacramento, CA 95812

RE: COMMENTS ON DRAFT SCOPING PLAN

Dear California ARB staff,

Thank you for this opportunity to comment on the AB 32 draft Scoping Plan. The urgency of need to comprehensively address climate change cannot be understated. I strongly support the state's greenhouse gas reduction goals. California needs both short-term and long term, cost effective, equitable, resource efficient, socially responsible and feasible actions to reach GHG goals.

My comments focus on where the scoping plan falls short on addressing the impact of the predominantly auto-oriented land use and transportation pattern of California's metropolitan areas and how this shapes travel behavior and its associated GHG impacts on our biosphere. It is essential that the scoping plan include essential and appropriate provisions for land use and transportation. Please consider the following:

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- The Center for Clean Air Policy (CCAP) shows that growth in vehicle miles traveled will overshadow reductions from low carbon fuels and vehicle GHG standards: in 2030 GHG will be 22 percent above the 2030 AB 32 goal. At least a 30 percent reduction in statewide VMT growth and 8 percent per capital is needed to support reaching AB 32 goals.
- The implementation of the Sacramento Council of Government’s Blueprint for managing regional growth indicates potential regional VMT reductions of up to 25 percent and a cumulative CO2 savings of 7.2 MMTCO2 with at a net cost savings of \$70/ton in reduced transportation capital costs and private fuel costs, accounting for an increased cost of transit services, per CCAP analysis. The scoping plan needs to recognize the cost effectiveness of VMT reduction strategies, as well as the need to ensure funding priorities for alternative land use and transportation scenario analysis, community engagement, education and outreach and improving travel modeling.
- Urban Land Institute’s growing cooler study points out the potential of integrated land use and transportation planning, “smart growth” can reduce VMT from 20 to 40 percent. The scoping plan needs to set forth recommendations for public investment to sustainable transportation, land use and infrastructure, and to create an environment that shifts private real estate investment decisions and cost competitiveness to more compact and infill smart growth patterns of development so smart growth can reduce emissions over the long term.
- The American Public Transportation Association’s study *Public Transportation’s Contribution to U.S. Greenhouse Gas Reduction* indicates that the most powerful household action to limit CO2 is taking public transportation, which can be more than ten times greater in reducing CO2 than other household choices being recommended, including home weatherizing and replacing incandescent bulbs and appliances. The scoping plan needs to support funding to invest in efficient transportation alternatives (transit, pedestrian, bicycle,

ridesharing and transportation demand management) to create essential travel options for Californian's other than reliance on the automobile.

The scoping plan's GHG reduction measures for "Local Government Actions and Regional GHG targets," however, is projected to reduce 2 MMTCO₂E is inconsistent with the California Climate Action Team's 27 MMTCO₂E estimate for land use and transportation in 2030. This needs to be addressed to reflect how coordinated land use and transportation strategies can be cost-effective strategies to reducing GHG and provide economic, health and environmental benefits to California.

The AB 32 Scoping Plan is an opportunity to initiate a comprehensive set of actions to reduce carbon emissions, enhance our environment, reduce oil dependence, save and diversify our energy use, and create green jobs and clean energy that supports the California economy. The scoping plan needs to set a higher reduction goal for land use and transportation, and set in place funding for coordinated land use and transportation strategies and programs per recommendations by Climate Plan, CCAP and LUSCAT.

Thank you for your consideration,

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