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Promoting Quality Affordable Housing and Community
Development Throughout San Diego County

August 20, 2008

Mary Nichols
Chair, California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

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Scripps, LLP

RE: Comments on Draft Climate Change Scoping Plan

Dear Ms. Nichols:

The Board of Directors of the San Diego Housing Federation strongly recommends that you give consideration and stronger emphasis to the significance of vehicle miles traveled (VMT) as a key contributor to climate change, and as an essential factor in combating it. **VMT reduction should be a main strategy of the Scoping Plan.**

The San Diego Housing Federation is a coalition of affordable housing developers, those who finance the creation of affordable homes, and advocates who support the mission of creating affordable homes for low-income families and people in need.

The creation of homes close to jobs and public transit are important considerations in the provision of affordable housing. This is not adequately emphasized in the AB 32 Scoping Plan. Smart Growth principles and incentives are key factors in promoting responsible land use and reducing automobile use, leading to reductions in greenhouse gas emissions.

Infill development promotes less VMT. It reduces sprawl, creates more walkable communities and mixed use neighborhoods, and encourages residents to drive less and choose public transit as their primary means of getting to work. Just as the Plan includes market-based incentives in the form of "cap and trade", incentives to eliminate sprawl and support infill development are needed.

We strongly encourage you to increase references and incentives in the Scoping Plan for reducing VMT and supporting better land-use planning to encourage and finance infill development. Unless these issues become a more serious, significant part of the Plan, they will be ignored when the details of the Implementation Plan are worked out. That would indeed be short-sighted and make what could be a national model for reducing greenhouse gas emissions inadequate to address the real issues of climate change.

Sincerely,

Tom Scott
Executive Director