July 29, 2008

Chairman Mary Nichols and
California Air Resources Board Members
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on Climate Change Draft Scoping Plan: Complete Streets, Transportation & Public Health

Dear Chairman Nichols and Members of the California Air Resources Board:

WALKSacramento commends the California Air Resources Board (CARB) for its groundbreaking efforts to develop a comprehensive plan to reduce greenhouse gas emissions. We strongly support the need for a comprehensive plan to set goals and describe programs to reduce greenhouse gas emissions.

WALKSacramento believes the Climate Change Scoping Plan can and should go much further to capture opportunities for reducing transportation related emissions while at the same time accruing significant health benefits. We urge you to refine the plan to:

1. **Mandate urban transportation networks of Complete Streets.** At the present time in California's urban and rural areas, a significant number of major streets are "incomplete" – that is they are inaccessible and/or unsafe for many users – those who walk, bicycle, take transit, or have disabilities. The condition of our major roadways particularly in suburban areas results in most people driving for most of their trips. This lack of Complete Streets results in a minimal mode share for walking and bicycling even for short trips. WALKSacramento's recent study of community colleges (the *Los Rios Transportation Connections Plan)* found that in some cases more than ½ of community college students live within 5 miles of their campus and yet very few walk or bicycle. This could change if the streets connecting to the colleges were designed to support all users. The Draft Scoping Plan can encourage California's communities – cities, counties, regions, to prioritize completing their major roadways within a reasonable time frame by developing a plan to achieve completion of the streets with yearly reports of progress. Completion of the streets includes adding sidewalks and bike lanes; providing convenient and well-marked roadway crossings; and providing other infrastructure improvements to support walking and bicycling.

We urge that the Draft Scoping Plan include an analysis of what this would mean in terms of transportation mode split and its resulting VMT impacts. Countries with complete transportation networks such as the Netherlands, Denmark and Germany, have significant numbers of people walking and bicycling for a major portion of their trip making. In California, the City of Davis is an example of a community with a network of Complete Streets and the resulting percentage of trips by bicycle and walking is much greater than in other communities in California.

2. **Mandate speed reduction and management.** It is well known that reducing high vehicle speeds results in reduced carbon emissions as well as reduced use of fuel. What is not so well known is the impact that reduced speeds has on supporting walkable and bikable environments. Collisions with pedestrians and bicyclists at high speeds are lethal. Reducing speeds on freeways can result in speed reductions on roadways in the vicinity of freeways. Designing roadways for speeds that accommodate all users on urban arterials supports more travel on foot and on bicycle. Additionally lowering speeds can support increased transit ridership as a significant obstacle to transit ridership is crossing high speed, multi-lane arterials to get to transit stops. Roadways can be designed for safe speeds as well as engineered with signal timing to keep traffic moving.

   We urge that the Plan fully explore the potential emission reductions that can occur with speed reduction and speed management on urban roadways. We understand that roads engineered to smooth traffic flow, reducing heavy accelerations and decelerations are generally positive for fuel efficiency and reduced carbon emissions.

3. **Fully evaluate the public health impacts.** The draft plan limits its public health assessment to asthma and respiratory disease from air pollution. We concur with other health professionals that CARB should undertake a more robust and comprehensive analysis to account for *all* the potential public health *benefits and costs* related to the various mitigation strategies. The health benefits of creating walkable and bikable communities should be addressed. We urge your review of the health related statistics of those countries with comprehensive and complete transportation networks – Netherlands, Denmark, and Germany.

4. **Include Safe Routes to School infrastructure and non-infrastructure programs.** Improving children's walking and bicycling routes reduces VMT and shifting chauffeur automobile trips to bicycle and pedestrian trips. Parents consistently site traffic safety as a top reason they won't let their children walk or bicycle to schools. A 2007 Caltrans study found that investing in Safe Routes to School infrastructure projects increased walking and bicycling in the range of 10% to 200%. The State has funded a state Safe Routes to School program at an average of $24.25 million/year for the past seven years, but those allocations are now part of our increasingly volatile state budget process. The Plan should call for an ongoing dedicated amount for Safe Routes to School programs to reduce VMT and vehicle emissions.

5. **Work with the California Department of Education (CDE) on revising their school building and siting requirements.** As we build and rebuild schools in this state, it is important to build and maintain schools that are neighborhood schools, where children can safety walk and bicycle. The National Household Travel Survey indicates that only

42% of school trips are one mile or less in California. A 2006 survey administered by WALKSacramento and the Partnership for Active Communities of parents at six elementary schools in the Natomas Unified School District (NUSD) found that walking to school decreases quickly as the 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. This finding led the NUSD to change the design of two of its new schools. It combined an elementary and middle school into one school. Not only will this support increased walking and bicycling by reducing the average distance of children to the school, it will enable older siblings to assist younger siblings walking or bicycling to school. The NUSD went further into making the connections to the school safe and convenient for children to walk and bicycle.

6. **Increase emission reduction targets associated with transportation activity emissions.** By assigning only minimal emission reduction targets to land use and transportation activities, CARB misses a critical opportunity to spur meaningful change in the built environment to mitigate climate change and improve the public's health.

7. **Set regional vehicle miles traveled (VMT) reduction targets:** Establish regional VMT targets to encourage cities and counties to pursue smarter transportation and land use planning that facilitates walking, biking, and transit use. We recommend that CARB set challenging but achievable targets based on local communities adopting transportation and land use best practices resulting in their communities becoming more and more pedestrian, bicycle and transit friendly.

Thank you for your consideration of these recommendations.

Sincerely,

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Executive Director

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cc: Partnership for Active Communities
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