

## **Comment 1 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Michael  
Last Name: Bullock  
Email Address: mike\_bullock@earthlink.net  
Affiliation:

Subject: RTAC & MPO Reports Ignore Important Facts  
Comment:

June 10, 2010

Air Resources Board  
1001 I Street, 2nd Floor  
Byron Sher Auditorium  
Sacramento, California 95814

SUBJECT: Comments on the Recommendations of the RTAC Pursuant to Senate Bill 375

Dear Air Resources Board Chair Mary Nichols and Members of the Board:

### 1.0 Introductory Comments

The AB32 Scoping Plan Executive Summary (Table 2) sets an annual reduction target of 5 MMTCO<sub>2</sub>E by 2020 for "Regional Transportation-Related GHG Targets".

However, it also says: "This number represents an estimate of what may be achieved from local land use changes." This type of statement has led to a misconception that zoning changes will be a predominate strategy to reduce driving by 2020. Given our current economic situation, only small reductions from "smart growth" can occur by 2020, and most may not show up until 2030 or later.

Fortunately, there are some basic pricing policies that could be implemented within several years that would result in significant VMT reductions before 2020. These are the pricing of parking and the implementation of road use fees, especially with congestion pricing (for both parking and road use). I have prepared a report on how to price parking, which is attached to

SB375 outlines a 7-step process for setting targets for each MPO. Step 3, which is strategy selection and evaluation, is the key to success. I would like to work with CARB staff to determine the politically feasible approaches that will lead to the required pricing strategies being accepted across the state and in each municipality. I understand and accept the challenge.

The SB375 process is far from ideal. Its process for establishing reductions could result in the MPOs feeling that they are being asked to determine what reductions they can easily achieve, with a guarantee that the targets will then be set to those values. Our climate crisis does not give us the luxury of setting targets to what the MPOs claim they can achieve, unless those targets are

better than the "AB32 requirements" (by that we will mean both the AB32 targets for 2020 and the subsequent executive order for 2050 targets). CARB should make it clear that the MPOs must determine the strategies that are required to achieve the needed targets, in order to avoid an unacceptable risk of climate destabilization.

Unfortunately, CARB fails to provide statewide benchmark driving reductions for 2020 and 2035. Although specific reductions would vary slightly from region to region, these benchmarks would give MPOs a feel for the level of driving reductions they will need to achieve. I provide such benchmarks in Section 2.1, based on Figure 1 of Reference 1.

MPOs are not getting the help they need from the state. California passed AB32 and SB375 legislation and then failed to identify a process that would help the MPOs get the pricing strategies that they need, to give them a reasonable chance of success.

The RTAC membership is impressive. However, I a systems engineer should have been included. My general observation that the state is not familiar with systems engineering and the benefits it could provide. The evidence for this includes passenger trains that collide; toll booths; California license plates that still have no RFID chips; primitive parking policies; and, even though we know that the Netherlands will soon implement a progressive and "green" road-use fee pricing system, we ignore the fact that our gas tax accounts are headed downward, as if this is no cause for action.

## 2.0 Significant Items Either Left Out or Given Insufficient Emphasis

Although I appreciate the valuable contributions contained within of the various RTAC and MPO reports, I must report on the significant items they either lack or fail to sufficiently highlight.

### 2.1 A Statewide, Driving-Reduction Benchmark

No where is there an analysis to estimate driving reductions needed by the target years of 2020 and 2035. This benchmark is needed to measure the acceptability of the targets that might result from SB375's 7-Step process. Since Reference 1 reports that SB375 sources (cars and light duty trucks) emit 30% (and growing) of the state's total GHG in 2005, it is reasonable to assume that their reductions would have to be near the AB32 targets. This results in the yellow line, shown on Figure 1 of this letter. Using Reference 1's Figure 1 (which is also Figure 1 of this letter), the following can be computed, with "now" being the July 1, 2009 level of driving and "BAU" being the Caltrans-provided, "Business As Usual" level of driving. (Our calculations are available on request.)

1.) In Year 2020, Californians can drive 8% more than now, but this is also 16% less than the 2020 BAU level of driving. Note that by just 2025, the 8% more must be reduced to 4% less.

2.) In Year 2035, Californians must drive 20% less than now and this is a shocking 52% less than 2035 BAU. Table 1 of this report shows additional results.

### 2.2 A Reasonable Expectation for VMT Reductions from "Smart Growth"

Very few new "smart growth" projects will be reducing VMT by year 2020. In the U.S., smart growth will probably only reduce VMT by between 7 and 10% by 2050 (Page 9 of Reference 2). Although "smart growth" is essential, it is clearly no panacea. The name "Sustainable Communities Strategy" has fostered an unrealistic expectation, held by many, that "smart growth" will be the primary, driving-reduction tool. The reports do little to dispel this dangerous myth. "Dangerous" because it may cause government to avoid the task of identifying strategies that will significantly reduce driving, including devising plans for overcoming the political barriers to achieving these strategies.

Figure 1 Data Supporting Calculations of Target GHG Driving Reductions

Table 1 Driving Reductions Required to Hit GHG Targets, Based on Figure 1 Data

### 2.3 A Reasonable Expectation for New Transit and the Need for Shifting Spending from Roads to Transit

The urgent need for this shift should be directed to all levels of government, in plain language. New state funding sources are identified in Section 2.6.1 of the recent RTAC report. At the same time, MPOs should not expect the state or federal government to bail them out with significant new transit systems. Our state and federal government's economies are in precarious states. It is likely that neither government will be able to help much with new transit. Our state/regional/local government responsibility is to meet and exceed AB32 reductions, regardless of budgetary restraints.

### 2.4. A Clear Statement of MPO Guidelines on Pricing and Its Significance

Compared to business-as-usual levels, driving reductions need to be substantial. Furthermore, "smart growth" VMT reductions are necessary (and should be maximized) but are far from sufficient. Finally, since transit expansion cannot be counted on for significant reductions, the only recourse for substantial reductions is the honest pricing of driving and parking. Page 3 of Reference 3 says that MPOs must,

1. Consider the use of alternative mode programs, congestion pricing, toll roads, and parking strategies. Examples include, but are not limited to the following:
  - i. Road pricing and High Occupancy Toll (HOT) lanes. To reduce VMT, MPOs should model adding pricing to existing lanes, not just as a means for additional expansion. Variable/congestion pricing should be considered.
  - ii. User fees such as fuel taxes and parking charges.
  - iii. Free or reduced fare transit fares.
  - iv. Expansion of Parking Cash-Out Programs

Although all of this is important, it is particularly interesting to note the words, "MPOs should model adding pricing to existing lanes, not just as a means for additional expansion. Variable/congestion pricing should be considered." (It is fascinating that these guidelines come from the California

Transportation Commission, whose agency, Caltrans, is still planning to build large freeway expansion projects in this state.) This MPO responsibility ("must consider" and "should model") should have been highlighted, because related reports strongly suggest that widespread pricing will be absolutely necessary if the MPOs are to have any chance of meeting their AB32 responsibilities.

For example, consider the following information. The Energy Policy Initiative Center (EPIC) is the well-respected San Diego "think tank" that has done the GHG Inventory report for SANDAG. "Cashout" is a program whereby companies pay their employees an extra amount of money, each time they get to work without driving, thus allowing them to, in effect, "cash out" their expensive car-parking. The EPIC author of Reference 4 found that cashout is one of the key policies that the San Diego region will need, in order to achieve AB32 reductions. In fact, Dr. Silva-Send assumed that all of the employers in San Diego County that had over 100 employees would implement cashout, and that this strategy alone would achieve a 12% reduction in driving to work. Dr. Silva-Send also assumed that this and other policies would lead to 16% of employees using transit to get to work. The SB375 experts (for example, in Reference 1) speak of a three-legged stool to get the needed GHG reductions, with the legs being cleaner fuels, cleaner cars, and less driving. To drive home the importance of pricing, Dr. Silva-Send speaks of a "four-legged stool", with the extra leg being pricing.

## 2.5 Many MPOs Are Ignoring the CTC's Guidelines to Model Adding Pricing to Lanes

Most MPOs are ignoring the guideline to model adding pricing to lanes. It looks like SANDAG is working on this, but many other MPOs appear to be ignoring this critical guideline.

## 2.6 The Social Inequity of the Current Pricing of Driving and "Free Parking"

Important aspects of social equity are covered in some of these reports. I am grateful for that. However it is disappointing that the reports fail to mention other forms of inequity that are directly related to strategies to reduce driving.

### 2.6.1 The Pricing of Road Use

A San Diego County newspaper, the North County Times (NCT), in a February 9, 2009 article, reported that the Chair of the California Transportation Commission (CTC) wrote that the gas tax currently contributes nothing to road construction and only provides half of the money needed annually for repairs.

<http://www.nctimes.com/articles/2009/02/09/news/columnists/downey/z8591536f3e7332da882575510076fale.txt>.

This shows that roads are being maintained and built with taxes that are unrelated to driving. This means that those that drive less are losing money to those that drive more.

Many have written about this form of social inequity. Both the Sierra Club California and the Environmental Caucus of the California Democratic Party have passed resolutions in support of a "comprehensive road-use fee pricing system" that would include all costs, including environmental and health costs, while protecting low-income drivers and protecting privacy. From <http://www.planetizen.com/node/41680> comes the information that the

Netherlands is planning a green (polluters pay more) VMT-based fee by 2012. Every vehicle type will have a base rate, which depends on its size, weight and carbon dioxide emissions. Charge will also depend on congestion. Taxes will be reduced to make the implementation revenue neutral. The net effect will be that those that drive a lot will pay more than they do now but those that drive less will pay less than they do now.

## 2.6.2 The Pricing of Car Parking

Similarly when off-street parking is "free" it often means that those that park less are being forced to subsidize the car parking of those that park more. Employee car parking often reduces all employees' wages, even those that never drive to work.

Parking costs are often bundled into the rent, at apartments. The USDA reports that one in seven American households struggled to put enough food on the table in 2008. If they owned less than the average number of cars at an apartment complex, they may have been paying an additional \$50 a month for rent, so that their wealthier neighbors could park numerous cars for free. \$50 a month could keep a family from going hungry at the end of a pay period. It is disappointing that this never occurs to the authors of the RTAC/CARB/MPO reports when they write about social justice and social equity and that none of the RTAC members suggest its inclusion when they produce reports.

## 2.7 The State's Responsibility to Implement Pricing Solutions

The state needs to devise a plan to get the needed pricing, in spite of the fairly obvious political difficulties within local municipalities.

### 2.7.1 The State's Responsibility to Implement a Comprehensive Road Use Fee Pricing System

Implementing a road-use fee method of pricing driving could be 95% revenue neutral. This would mean that the portion of taxes currently going to roads would be eliminated to the extent that the total tax reduction would amount to 95% of the new road use fee revenue. The resulting 5% extra could be used to fund transit. The Sierra Club California's "Comprehensive Road-Use Fee Pricing System" resolution references a 10-page memo that gives more detail about what such a road use fee would look like. It is available upon request. The Netherlands is estimating that their system will drop GHG by 10%, even though their gas tax was \$3.50 in 2005.

The California Transportation Commission's RTP Guidelines (Reference 3) can be given a rather negative interpretation. Again, from Reference 3, "MPOs must consider the use of alternative mode programs, congestion pricing, toll roads, and parking strategies". These words seem to transfer all responsibility from the State to the MPOs, even though a comprehensive road use fee pricing system is obviously easier to develop and implement at the state level. The MPOs are left with the impossible task of implementing crude HOT lane projects, which are unwieldy, unpopular, and, according to Reference 5, unprofitable.

Consider the AB1493-driven green line on Figure 1. Although its units are CO<sub>2</sub>/mile as a function of year, the CO<sub>2</sub> can be converted to gallons of fuel, which can be converted to excise gas tax. Clearly, the excise gas tax is only going to go down as we go

forward in time. How long can road maintenance money be taken, in ever growing amounts, from education, public safety, and health and welfare programs? Please ask for immediate legislative help.

#### 2.7.2 The State's Responsibility to Begin a Process to Result in Widespread Pricing of Parking

One example of such a process is the Cities21 proposal, which can be read at: [http://www.cities21.org/cms/Cities21\\_CA\\_pkng\\_chrg.pdf](http://www.cities21.org/cms/Cities21_CA_pkng_chrg.pdf). This proposal has been presented to Senator Joe Simitian, as an entry in his "There Ought to be a Law" competition.

Another approach is to fund a description of an ideal parking policy that would universally, efficiently, and conveniently unbundle the cost of parking for all off-street parking, with a compatible policy for on-street parking. This would include full automation and congestion pricing. It would support the sharing of parking. The next step would be to take bids and award a contract on implementing the described system as a proof-of-concept and design, prototype application, to include all debugging, through to a full and satisfactory conclusion. Adjustments to satisfy all stakeholders would complete this second step. For the final and third step, the state would create an agency to implement unbundled car parking as they see fit. Their choice of order would be to maximize driving reductions and minimize political opposition. The law would require that the parking stakeholders, in each case, would fully cooperate with the state parking agency. This would work around the need for local governments to adjust their off-street parking ordinances to require unbundled parking cost. This local adjustment would be nearly impossible because the ideal parking policies will cost more to develop than local government could bear. It is more properly done at the state level, so its application can be consistent, throughout the state. After parking costs are unbundled, less parking will be needed and redevelopment of the freed-up parking land could lead to converting standard development into mixed use, with more dense development, which will also reduce the need to drive. Note that this approach will allow the state to recover its parking policy development costs by defining parking-lot earnings to be net collection minus collection costs. The state will claim sufficient collection costs to recover their development money. Note also that the parking lot earnings are new, taxable-income amounts. This new state income tax revenue could be used for transit. The attached report has more details as to how such a program could work.

#### 2.8 Bicycle Education as a Strategy to Reduce VMT

Many regions have ideal weather for cycling. Few people ride because we spend little public money on teaching adults the information and skills they need to bicycle on the roads with cars and trucks. The information would include bicycle accident statistics and car-bike accident statistics. Most adults either never ride or ride poorly because they overestimate the danger posed by overtaking traffic. Bicycle education could change this. SANDAG has a budget of \$270M for bicycles, out to year 2030. They are wasting this on bike trails because they have not been tasked with maximizing riding per unit cost and have therefore not bothered with doing an alternatives analysis. Trails reinforce the idea that bikes cannot be safely ridden with traffic. The San Diego Bike Coalition offers ideal classes on riding. Unfortunately, they must charge a significant amount of money for the class. Instead, the class should be set up so that those that pass the class are

given a cash reward. The \$270M could educate a million San Diego County adults on how to safely ride in traffic. Their lives would be forever changed, for the better. This would significantly reduce driving. All of the co-benefits are obvious and so will not be stated.

### 3.0 Additional Observations

#### 3.1 The Strategic Growth Council

The SGC is funded by Proposition 84. The SGC could work with a progressive MPO to create the implementation details of the most promising strategies, which are the pricing of driving and parking. In this way, the state would need to add no additional funds to these efforts.

#### 3.2 How Does an APS "Bridge the Gap"?

Your staff has written that the APS will "bridge the gap" between what is feasible (the SCS) and what is beyond that, as described in the APS. Since the MPO will have found that the APS is infeasible, I do not understand that choice of words. If any MPO finds that it must resort to an APS, there is an impending failure to meet the required targets.

#### 3.3 Misleading CARB Information

CARB has written, "California's strategy for reducing greenhouse gas emissions from passenger cars includes three elements: vehicle technologies, low-carbon fuel technologies, and reduced vehicle use through changed land use patterns and improved transportation."

It should say, "California's strategy for reducing greenhouse gas emissions from passenger cars includes three elements: vehicle technologies, low-carbon fuel technologies, and reduced vehicle use through changed land use patterns and improved ("green") transportation infrastructure and policy." In that sentence, "policy" is the key word because it would include pricing policies.

#### 3.4 BMP Items for Pricing Are Meaningless Unless the Pricing Can Be Implemented

Since the pricing of parking and driving are important, BMP tools are needed for these strategies. However, having a tool to compute driving reductions as a function of price is meaningless until a clear implementation plan has been devised. The development of the plan needs to start as soon as possible. The attached document contains an implementation plan.

#### 3.5 Travel Demand Models that Have Pricing Capability

Table 1a in the Appendix of the RTAC report shows that only SANDAG claims to have the capability to model "Tolls/Toll Roads" and priced parking. We see that they also claim to be bringing their capability to model HOT lanes up to the same standard. However, it appears that no other MPO have this capability. This makes it imperative that either a BMP tool be created that can handle these cases or SANDAG share their capability with other MPOs.

SB375 states, where "commission" is the CTC, "This bill would require the commission to maintain guidelines, as specified, for

travel demand models used in the development of regional transportation plans by metropolitan planning organizations".

It appears that the Reference 3 CTC guidelines (must model pricing) are being ignored by most MPOs. It appears that there is a lot of work that needs to be done in very little time. The BMP list was due by January 2010. Of 18 MPOs, 10 have no capability to model "Tolls/Toll Roads" and of these 10, 8 have no planned improvement to fix this RTP guideline deficiency. Similarly 9 of the MPOs have no capability to model the pricing of parking and only 1 of them is planning to fix this deficiency. This means that the BMP tool to compute reductions from pricing will probably be the predominate method used.

### 3.6 Need to Define "4-Step" Model

The RTAC report refers to a "4-Step" model. This needs a brief explanation.

### 3.7 Inconsistent Descriptions of What is in an SCS

The reports make it clear that pricing strategies are going to be key strategies.

On the other hand, these reports sometimes imply that no pricing is needed.

### 3.8 A Very Questionable Committee Value Judgment, Presented as Fact

It has been written that "Committee members agreed that the targets need to be set to help put California on the path to achieving the state's ambitious climate goals by 2050." Who says the goal is ambitious? If honest pricing were to be introduced, the 2050 goal might easily be obtained. Besides this, the 2050 value is based on 450 ppm, which we now know is too large. We need to get to 350 ppm as soon as possible. It could just as well be said that the 2050 goals are irresponsibly lax.

### 3.9 How to Rationalize Failure?

There are many statements that would concern anyone who wants to see success. For example, "most ambitious achievable" is an interesting phrase but it does little good to "define it" with more words that are undefined. The physics we are dealing with has nothing to do with our language. We must do better than the AB32 values so that we can minimize the time we are above 350 ppm.

### 3.10 Conflicting State Mandates

The AB32 mandate for less driving is in conflict with the state policy that we have no road-use fee and our gas tax is too low. State policy makes it artificially cheap to drive.

### 3.11 State Actions to Support Implementation

There are many appeals to the state for money. The state has no money. The reports never mention that the state needs to properly price driving to unbundle the cost of parking a car.

### 3.12 The Co-benefits Section of the RTAC Report Ignores the Fairness of Proper Pricing



Proper pricing is also equitable. This is a significant co-benefit

I appreciate the opportunity to discuss these critically important matters.

Sincerely,

Mike Bullock

References:

- 1.) Communities Tackle Global Warming.  
<http://www.nrdc.org/globalwarming/sb375/files/sb375.pdf>
- 2.) Growing Cooler.  
<http://www.smartgrowthamerica.org/documents/growingcoolerCH1.pdf>
- 3.) Addendum to the 2007 Regional Transportation Plan Guidelines, Addressing Climate Change and Greenhouse Gas Emissions during the RTP Process.  
[http://www.catc.ca.gov/programs/rtp/Adopted\\_Addendum\\_2007\\_RTP\\_Guidelines.pdf](http://www.catc.ca.gov/programs/rtp/Adopted_Addendum_2007_RTP_Guidelines.pdf)
- 4.) Reducing Greenhouse Gases from On-Road Transportation in San Diego County (October 2009)  
<http://www.sandiego.edu/epic/ghgpolicy/>
- 5.) HOT Tips (July 2008).  
[http://paleale.eecs.berkeley.edu/~varaiya/papers\\_ps.dir/HOT-2.pdf](http://paleale.eecs.berkeley.edu/~varaiya/papers_ps.dir/HOT-2.pdf)

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/1-manuscript18b.pdf>'

Original File Name: Manuscript18b.pdf

Date and Time Comment Was Submitted: 2010-06-09 19:29:06

No Duplicates.

**Comment 2 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Evan

Last Name: Low

Email Address: Non-web submitted comment

Affiliation:

Subject: SenBill375

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/2-low.pdf>'

Original File Name: Low.pdf

Date and Time Comment Was Submitted: 2010-06-14 15:37:08

No Duplicates.

### **Comment 3 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Michael

Last Name: Cahn

Email Address: velocipedus@gmail.com

Affiliation: Los Angeles County Bicycle Coalition

Subject: Ambitious SB375 targets

Comment:

To the Air Resource Board, -

TOday the president has spoken about the environmental disaster in the golf, and he has reminded us that the area of dirty carbon energy has to come to an end. Now is the time, not any other time: NOW the president said, and you have the opportunity to have a significant impact in this respect. By setting ambitious targets for Greenhouse Gas Reductions California will show leadership in the path beyond oil and all its attendant risks and environmental costs. Shrinking funds for transportation projects and the urgent need to reduce green house gas emissions - now is the time to create affordable and efficient transportation solutions that provide alternatives for all members of our communities. By improving the walking and bicycling environment, with increased investments and better policies, with education and encouragement, we can reach those goals in California, where 40% of all car trips are 2 miles or less in length - this represents a great opportunity for increasing bicycling and walking. We know this is something communities in California want and we know that it is good for the air resources you are tasked to protect. Please let us learn the lessons from the disaster in the golf, and let us show the world that we can learn and that we can do the right thing.

Dr Michael Cahn

Board, Los Angeles County Bicycle Coalition

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-15 21:12:35

No Duplicates.

**Comment 4 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Barbara

Last Name: Filet

Email Address: barbarafilet@earthlink.net

Affiliation: Santa Monica Spoke

Subject: routine accomodation for safe routes for pedestrians and bicyclists

Comment:

By improving walking and bicycling environments, California can meet ambitious greenhouse gas reduction targets. Redesigning roads to be safe for getting to schools make them safe for everyone. So please set ambitious targets so we can make real changes on the roads and get people of all ages out of their cars. Strict targets would motivate people to learn how to ride their bicycles for transportation.

Santa Monica Spoke

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-15 22:34:56

No Duplicates.

**Comment 5 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Sarah  
Last Name: Hadler  
Email Address: sjhadler@aol.com  
Affiliation:

Subject: senbill375  
Comment:

With shrinking funds for transportation projects and the need to reduce green house gas (GHG) emissions - now more than ever we need to create affordable and efficient transportation solutions that provide alternatives for all members of our communities. By improving the walking and bicycling environment, with increased investments and better policies, we can reach those goals in California. 40% of all trips are 2 miles or less in length - this represents a great opportunity for increasing bicycling and walking - but we need the investments to get there. We know this is something communities in California want. Safe Routes to School funds receive 5 times as many requests for funds than available throughout the state.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-16 15:49:25

No Duplicates.

**Comment 6 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Michael  
Last Name: Denton  
Email Address: gigantesmike@aol.com  
Affiliation:

Subject: SB375  
Comment:

Dear Chairman Nichols,

I am writing to thank you for your leadership on climate change policy and to encourage the California Air Resources Board to support public health by establishing the most ambitious regional greenhouse gas reduction targets possible under SB375.

Establishing strong targets will clearly signal the need for a departure from business as usual sprawl and support more sustainable communities throughout California where residents have healthier, physically active walking, biking or transit alternatives to driving.

Improving California's land use and transportation planning processes to reduce our dependency on driving offers a wide range of benefits to our communities. Along with reducing our ongoing air pollution-related public health crisis and cutting our contributions to climate change, promoting opportunities for daily physical activity will reduce the burdens faced by our children, the elderly and others living with chronic illnesses like asthma, obesity, diabetes and depression.

Please continue to support public health by establishing strong regional greenhouse gas targets.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-17 14:00:21

143 Duplicates.

**Comment 7 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: C.

Last Name: Pretzer

Email Address: cepsc@juno.com

Affiliation:

Subject: Our Future

Comment:

Support of SenBill 375 is essential for the future liviablilty of CA! Take a hint from those who are eldering and want smaller houses, near needed services..... This is well thought out legislation that deserves support from all who care about their future and that of others. Thanks for your support.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-17 14:08:53

No Duplicates.

**Comment 8 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: John

Last Name: Proudian

Email Address: jpproudian@sbcglobal.net

Affiliation:

Subject: Implementation of SB375

Comment:

Members of the CARB,

As a senior citizen living in one of the most polluted basins in the country, i.e. the San Joaquin Valley in Central California, I strongly urge you to initialize the implementation of SB375. This is a measure that will start the process of returning clean and healthy living to our region and probably give our grandchildren a better chance to live healthier and happier lives. Thank you for your time and consideration.

John Proudian

jpproudian@sbcglobal.net

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-17 14:13:58

No Duplicates.



**Comment 9 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Erik

Last Name: Beck

Email Address: ebeck@publiclawcenter.org

Affiliation: Public Law Center

Subject: Public Comment RE: SB 375 Target Setting Efforts

Comment:

See attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/33-public\_comment.pdf'

Original File Name: Public Comment.pdf

Date and Time Comment Was Submitted: 2010-06-17 16:34:45

No Duplicates.

**Comment 10 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Roseann  
Last Name: Andrus  
Email Address: randrus@ccc-oc.org  
Affiliation: Child Care Connections

Subject: Livable communities throughout California  
Comment:

Dear Chairman Nichols,

I am writing to thank you for your leadership on climate change policy and to encourage the California Air Resources Board to support public health by establishing the most ambitious regional greenhouse gas reduction targets possible under SB375. Establishing strong targets will clearly signal the need for a departure from business as usual sprawl and support more sustainable communities throughout California where residents have healthier, physically active walking, biking or transit alternatives to driving.

Improving California's land use and transportation planning processes to reduce our dependency on driving offers a wide range of benefits to our communities. Along with reducing our ongoing air pollution-related public health crisis and cutting our contributions to climate change, promoting opportunities for daily physical activity will reduce the burdens faced by our children, the elderly and others living with chronic illnesses like asthma, obesity, diabetes and depression.

Please continue to support public health by establishing strong regional greenhouse gas targets.

Attached is a document providing recommendations for incorporating Child Care Facilities in transportation planning

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/63-white\\_paper-child\\_care\\_final.docx](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/63-white_paper-child_care_final.docx)'

Original File Name: White Paper-child care FINAL.docx

Date and Time Comment Was Submitted: 2010-06-18 10:15:05

No Duplicates.

## **Comment 11 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Cesar  
Last Name: Covarrubias  
Email Address: cesarc@kennedycommission.org  
Affiliation: The Kennedy Commission

Subject: SB 375 Community Participation  
Comment:

June 18, 2010

Mary Nichols, Chairman  
California Air Resources Board (CARB)  
1001 "I" Street  
Sacramento, CA 95814

RE: SB 375 Community Participation

Dear Chairman Nichols:

The Kennedy Commission is a broad based coalition of community organizations and advocates that focus on building sustainable communities by creating a supportive environment for the creation of affordable home opportunities for families earning less than \$20,000 annually in Orange County.

The Commission would like to acknowledge the extensive work the California Air Resources Board (CARB) has done to prepare a framework to embark on the implementation of SB 375 and setting regional targets to reduce greenhouse gas emissions from motor vehicles.

As CARB move towards planning for SB 375 implementation and setting regional greenhouse gas emission targets, the Commission would like to emphasize the importance of seeking out and considering input from traditionally underrepresented group and organizations that represent or advocate for these underrepresented groups. We want to ensure the plan and strategies provide for early and meaningful public participation in the decision-making processes in the implementation of SB 375 and setting regional targets for greenhouse gas emission. In addition, we ask CARB to set ambitious targets that facilitates the development of sustainable communities at a regional level.

The Commission believes the implementation of SB 375 and setting regional targets for greenhouse gas emissions can address environmental, transportation and housing issues to create more sustainable and healthier communities in Orange County. While SB 375 has great potential to enhance the quality of life for residents, the Commission is deeply concerned that without specific language, strategies and modeling, SB 375 implementation strategies could fail to address housing needs and affordability as key factors to reducing vehicle trips and commutes that will create

more sustainable communities.

Orange County ranks among the top ten least affordable metropolitan areas in the country, the need for homes affordable to low-wage earners is enormous (National Low Income Housing Coalition (NLIHC), 2010). Orange County's Fair Market rent for a two-bedroom apartment is \$1,594 and the housing wage (hourly wage needed to afford a typical two-bedroom apartment) is over \$30.00 per hour (NLIHC, 2010).

In order to afford the average priced apartment in Orange County, a minimum wage earner must work 151 hours a week or have 3.8 full-time jobs (NLIHC, 2010). Also, the high cost of housing forces many households looking for an affordable home to live outside Orange County (i.e. Inland Empire) while working and commuting to Orange County's job centers (Orange County Business Council Workforce Housing Scorecard, 2007).

As CARB reviews the Metropolitan Planning Organization's (MPO) planning scenarios and prepares to release the region's draft greenhouse gas emission targets, the Commission urges that the following issues be addressed:

#### Effective Public Participation

The creation, planning process and implementation of SB 375 should be conducted with meaningful outreach and participation from: 1) low-income and minority community members and; 2) the partnering of affordable housing advocates and developers to ensure that the un-met needs of homes affordable to families are addressed.

#### Affordability for Extremely Low, Very Low and Low-Income Households

SB 375 should be created and implemented to ensure that the development of affordable homes for extremely low, very low and low-income families are encouraged and facilitated. Specifically, CARB should ensure MPO planning scenarios and the draft target setting encourages and facilitates residential rental developments that are 100% affordable to lower income families.

While SB 375 promotes higher-density development, higher-density does not necessarily produce more affordable homes. In Orange County, higher density mixed-use and transit oriented development have been planned or developed to provide housing opportunities for higher income households. These developments lack housing opportunities that are affordable for lower income households.

#### Performance Measure Consideration

To facilitate the development and objectives of an effective SB 375, the process in setting the region's greenhouse gas emission targets should reflect, analyze and incorporate performance measures such as: 1) co-benefits that positively impacts and maximizes community and environmental community benefits and; 2) jobs-housing "fit" that addresses the discrepancies between the housing costs of a community and the actual wages and earnings of the residents living in the community.

By addressing these concerns, our goals in the implementation of SB 375 and reducing greenhouse gas emissions would be achieved.

The Kennedy Commission looks forward to working with CARB to achieve our mutually beneficially goals in creating more sustainable, healthier and equitable communities in Orange County. Specifically, the Commission welcomes the opportunity to continue our dialogue that will result in the production of new homes affordable to extremely low, very low and low-income households.

If you have any questions, please feel free to contact me at (949) 250-0909 or [cesarc@kennedycommission.org](mailto:cesarc@kennedycommission.org).

Sincerely,

Cesar Covarrubias  
Executive Director

cc: Hasan Ikhata, SCAG

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/68-ltr\\_sb375\\_carb\\_10.6.18.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/68-ltr_sb375_carb_10.6.18.pdf)'

Original File Name: Ltr\_SB375\_CARB\_10.6.18.pdf

Date and Time Comment Was Submitted: 2010-06-18 16:16:22

No Duplicates.

**Comment 12 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Eva

Last Name: Inbar

Email Address: eva\_inbar@cox.net

Affiliation:

Subject: SB 375

Comment:

Dear CARB,

Please ensure that local MPO's are setting targets that are actually ambitious in the spirit of the law. My own SBCAG is about to set targets that are decidedly unambitious, allowing them to continue with business as usual. Please insist on strong smart growth, anti-sprawl policies, so that more trips can be made by walking and biking. Also, we need better infrastructure for these modes, including Safe Routes to School. The GHG emitted by these modes is 0!

Sincerely,

Eva Inbar

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-18 21:23:40

No Duplicates.

**Comment 13 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Samantha  
Last Name: Robinson  
Email Address: samlrob@gmail.com  
Affiliation: SF Resident

Subject: Set ambitious greenhouse gas reduction targets  
Comment:

Dear Air Resources Board member,

Please adopt ambitious greenhouse gas reduction targets for SB 375. I would like to see my community become more walkable and less congested, and I would like to see more transit and housing options for all residents.

I understand that one of the best ways to ensure communities grow in a sustainable way is to set ambitious greenhouse gas reduction goals at the regional level. I recognize that it may take a little time for the reductions to take effect, but the benefits will be invaluable to my community for generations to come.

Sincerely,

Samantha Robinson  
1400 Washington, #7  
San Francisco, CA 94109

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 10:04:01

63 Duplicates.

**Comment 14 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Dan

Last Name: Rademacher

Email Address: dan.r.rademacher@gmail.com

Affiliation:

Subject: Set ambitious greenhouse gas reduction targets

Comment:

Dear Air Resources Board member,

I'm writing to encourage you to adopt ambitious greenhouse gas reduction targets for SB 375. I am active in my town, Oakland, with local nonprofits and City Council members who are trying to chart a course for a low-carbon future in our community.

I firmly believe that charting such a future is essential not only to the larger global problems of climate change, but also to local issues of quality of life, access to jobs, housing, and transit, ongoing innovation and resulting jobs, and more.

Working locally is empowering, but we are also subject to the larger political picture in California, and ambitious targets from CARB would be a tremendous boon in continuing our momentum toward a lower carbon, more prosperous and healthier community, and I have no doubt other cities and towns all over the state would reap similar benefits.

Sincerely,  
Dan Rademacher  
Oakland, California resident

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 10:12:12

No Duplicates.



**Comment 15 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: David  
Last Name: Chittenden  
Email Address: davidlc56@hotmail.com  
Affiliation:

Subject: SB375  
Comment:

For a viable future we need to reduce green house gases  
Pls support this bill

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 10:14:27

No Duplicates.

**Comment 16 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Larry  
Last Name: Orlick  
Email Address: Orlidon@pacbell.net  
Affiliation:

Subject: sen bill 375  
Comment:

Dear Sirs and Madams,

Look, we all need to breath and hopefully we can all do it for a long time to come. But we should also have laws that are reasonable too and not just a knee jerk reaction. The last bills enacted for diesel engines was an abomination. Outrageous compliance fees that were required and then you had to back paddle \_after\_ the financial impact was felt. The people that complied early pad HUGE amounts to comply and then after you back paddled they could not get any refund. This is devastating small business owners (owner operators), farmers and construction companies. With the way our economy is now, we do not need a stranglehold on business. I am all for breathing, but going overboard is not the answer either. Please do your research and use your head before you enact.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 10:16:34

No Duplicates.

**Comment 17 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Jennifer

Last Name: Natali

Email Address: jennifer.natali@gmail.com

Affiliation:

Subject: Support ambitious greenhouse gas targets

Comment:

Dear Air Resources Board member,

Please adopt ambitious greenhouse gas reduction targets for SB 375. Although I am taking many personal measures to reduce my carbon footprint, we need regional planning initiatives and regulations in order to support the health and sustainability of California. We need to create more walkable communities and support more public transit options in order to reduce our consumption of fossil fuels. Please avoid incentives for sprawling development and instead support investment in vibrant, diverse and affordable communities that integrate ecological services into urban life. We need to kick our addiction to oil, reduce our energy use and clean our environment with an aggressive bill now.

Sincerely,

California resident

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 10:33:31

No Duplicates.

**Comment 18 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Peter  
Last Name: Tannen  
Email Address: ptannen@aol.com  
Affiliation:

Subject: greenhouse gas reduction  
Comment:

Dear Board member -

I am contacting you to urge you to adopt stringent greenhouse gas reduction.

By setting ambitious greenhouse gas reduction goals at the regional level, this will encourage communities to become more walkable and less congested. It will also promote better transit and housing options.

Thank you for your consideration.

Yours truly,

Peter S. Tannen

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 10:59:21

No Duplicates.

**Comment 19 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: George

Last Name: Markell

Email Address: georgemarkell@comcast.net

Affiliation:

Subject: Please set ambitious goals for greenhouse gas reduction

Comment:

Global warming due to increased levels of greenhouse gases led one scientist to predict that the human species will soon become extinct, possibly within 100 years:

<http://www.redorbit.com/news/science/1881226>

In the same article, another scientist is quoted saying, "We have the scientific knowledge to do it (reduce greenhouse gases) but we don't have the political will." Please, don't be swayed by skeptics -- you must set ambitious targets.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 11:31:51

No Duplicates.

**Comment 20 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Todd

Last Name: Gilens

Email Address: tgilens@hotmail.com

Affiliation:

Subject: targets for emissions

Comment:

Greetings. I urge you to adopt ambitious targets for emissions reductions throughout California. Growing up in Los Angeles, and now living in the San Francisco Bay Area, I hold air quality to be an important part of my quality of life. I am equally concerned with the consequences of emissions reductions on everyday life - factors that encourage walking and bicycling communities, lowering the resource needs of towns and cities by supporting denser and clustered urban designs, effects on human health and the reduction of collateral pollution such as noise and contaminated road runoff.

many thanks.

Todd Gilens

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 11:47:57

No Duplicates.

**Comment 21 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Cindy  
Last Name: Horvath  
Email Address: chorvath13@yahoo.com  
Affiliation:

Subject: GHG Reduction Targets  
Comment:

Dear Board Members,

I am writing to urge you to consider setting stringent targets for GHG reduction levels for the regions throughout the state. I am a Planner by profession in the Bay Area, and work directly with the development of our jurisdiction's Climate Action Plan. I know that the constituents will push back mightily, but it really is time to bite the bullet here and enforce not only tough standards, but also require higher fuel efficiency in cars that are made and driven in this state.

Thank your for the consideration of this request.

Cindy Horvath

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 12:15:11

No Duplicates.

**Comment 22 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Joan

Last Name: Crotty

Email Address: jccrotty1521@earthlink.net

Affiliation:

Subject: greenhouse gas reduction

Comment:

Please vote to reduce greenhouse gas through SB 375. I think it's obvious at this point in time that our earth is suffering and on the verge of a lot of disasters. Small steps like making our communities more walkable and promoting mass transit are the key to saving some greenery for future generations. It will take time for reductions in greenhouse gases to take effect and that's why it's critical that we start now.

Joan Crotty  
San Francisco

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 12:24:08

No Duplicates.



**Comment 23 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: william

Last Name: barnes

Email Address: wbarnes800@earthlink.net

Affiliation:

Subject: SB 375

Comment:

I hope you will seriously consider setting ambitious green house gas reduction targets with clear bench marks and relatively tight timetables. Thank you, William Barnes, San Francisco

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 13:29:58

No Duplicates.

**Comment 24 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Danielle  
Last Name: Fugere  
Email Address: dfugere@foe.org  
Affiliation: Friends of the Earth

Subject: Support for Strong Regional GHG Targets under SB 375  
Comment:

Dear Chairman Nichols,

On behalf of Friends of the Earth, we applaud your efforts to reduce air pollution and to encourage the growth of sustainable California communities through implementation of SB 375. We understand that CARB will soon release draft regional greenhouse gas reduction targets and we urge you to take this opportunity to adopt the strongest possible targets under SB 375.

SB 375 offers a comprehensive approach to reducing greenhouse gas emissions, improving public health, and encouraging alternative forms of transportation through innovations in land use, community development, and public transportation. California is home to some of the worst air pollution in America—a result of poor planning which has encouraged sprawl instead of smart development. This trend must be reversed and we urge you to adopt the most ambitious GHG reductions possible via SB 375.

Under your leadership, we can take the necessary steps now to move California towards a more sustainable and healthy future.

Thank you for your consideration of our concerns. A full letter with signature is attached for your convenience.

Sincerely,

Danielle Fugere  
Director, California Government Affairs  
Friends of the Earth

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/127-letter\_to\_carb\_sb\_375\_pdf.pdf'

Original File Name: Letter to CARB\_SB 375\_PDF.pdf

Date and Time Comment Was Submitted: 2010-06-21 15:21:11

No Duplicates.

**Comment 25 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Barbara  
Last Name: Fukumoto  
Email Address: barbf53@aol.com  
Affiliation:

Subject: ambitious GHG reduction targets, please  
Comment:

Dear Air Resources Board member,

This generation has the awesome responsibility to take action commensurate with the environmental challenges we face. Please adopt ambitious greenhouse gas reduction targets for SB 375. Ambitious targets will protect the environment on which we all depend from sprawl and from air and global warming pollution. And it will benefit our community at the same time.

With ambitious targets our residents will have more transportation and housing choices. With ambitious targets our community will have a timeline for becoming more walkable and bikable and our residents safer and healthier. Our streets will be less-congested and our air cleaner. Families will have more time together because commutes will be shorter. Local food sources will be preserved. Open space will be protected, enhancing our quality of life.

Environmental and community goals align. You have my support in adopting the kind of ambitious goals that our environment and our communities need.

Sincerely,  
Barbara Fukumoto  
Sunnyvale, California

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 15:02:56

No Duplicates.

**Comment 26 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Jean

Last Name: Mellinger

Email Address: jmelling7@aol.com

Affiliation:

Subject: senbill375

Comment:

Dear Chairman Nichols,

I am writing to thank you for your leadership on climate change policy and to encourage the California Air Resources Board to support public health by establishing the most ambitious regional greenhouse gas reduction targets possible under SB375.

Establishing strong targets will clearly signal the need for a departure from business as usual sprawl and support more sustainable communities throughout California where residents have healthier, physically active walking, biking or transit alternatives to driving.

Improving California's land use and transportation planning processes to reduce our dependency on driving offers a wide range of benefits to our communities. Along with reducing our ongoing air pollution-related public health crisis and cutting our contributions to climate change, promoting opportunities for daily physical activity will reduce the burdens faced by our children, the elderly and others living with chronic illnesses like asthma, obesity, diabetes and depression.

Please continue to support public health by establishing strong regional greenhouse gas targets.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 16:41:53

No Duplicates.

**Comment 27 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Jim

Last Name: Stark

Email Address: jstarkandassociates@gmail.com

Affiliation:

Subject: SB375

Comment:

CARB:

SB375 discriminates against the disabled and low income people and families.

Is my son with Cerebral Palsy, when I am not around, going to be put on your hit list for low tire inflation and be fined or what ever you have in mind to somehow enforce your useless SB375?

He cannot even inflate the tires of his wheelchair !!!

How in the hell is he going to maintain tires on a van converted for his wheelchair.

Where are you going to get \$100,000,000 to support this ignorant proposal. Are you going to rely on fines from my son to "save the planet"?

Jim Stark

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 16:45:49

No Duplicates.

**Comment 28 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Marcia

Last Name: Kolb

Email Address: mbkolb@hotmail.com

Affiliation:

Subject: Greenhouse gas targets

Comment:

I support strong greenhouse gas reduction targets to make our region more livable, and to do our part to solve the climate crisis.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 17:36:15

No Duplicates.

**Comment 29 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: robert

Last Name: bregoff

Email Address: robert\_bregoff@dot.ca.gov

Affiliation:

Subject: Set Ambitious Goals! Double it!

Comment:

Since SB375 will directly impact air quality and how we get around, it's essential that we set ambitious goals and stick to them. A sea-change in the way we live, shop and travel is not going to happen on its own. Given the tragic gulf oil spill, it's essential that we take an aggressive stance against all kinds of pollution, but especially internal combustion-based air degradation. This is the time to make it happen.  
Rob Bregoff

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 21:49:49

No Duplicates.

**Comment 30 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Katherine

Last Name: Perez

Email Address: katherine.perez@uli.org

Affiliation: Urban Land Institute

Subject: SB 375

Comment:

Good Afternoon,

On behalf of the Urban Land Institute, we would like to provide a report completed by the Urban Land Institute and Smart Growth America titled "375 Impact Report." The report provides insight from the real estate development and land use community on SB 375.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/151-sb375impactanalysisreport.pdf'

Original File Name: SB375ImpactAnalysisReport.pdf

Date and Time Comment Was Submitted: 2010-06-22 10:39:34

No Duplicates.



**Comment 31 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Anthony

Last Name: Montapert

Email Address: amontapert@roadrunner.com

Affiliation:

Subject: support cleaner air

Comment:

I encourage the California Air Resources Board to support public health by establishing the most ambitious regional greenhouse gas reduction targets possible under SB375. Improving California's land use and transportation planning processes to reduce our dependency on driving offers a wide range of benefits to our communities. Along with reducing our ongoing air pollution-related public health crisis and cutting our contributions to climate change, promoting opportunities for daily physical activity will reduce the burdens faced by our children, the elderly and others living with chronic illnesses like asthma, obesity, diabetes and depression.

Please continue to support public health by establishing strong regional greenhouse gas targets.

•@

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-22 13:06:52

No Duplicates.

**Comment 32 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Mike

Last Name: Scott

Email Address: mike-exanimo@sbcglobal.net

Affiliation:

Subject: Please adopt the LCFS

Comment:

Please adopt the LCFS!    Serve the public,   NOT polluters.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-22 13:07:10

No Duplicates.

**Comment 33 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Heather  
Last Name: Herington  
Email Address: hlh0320@roadrunner.com  
Affiliation:

Subject: Clean Air Bill 375  
Comment:

Please do as much as humanly possible to clean up the air so we can  
all breathe deeply  
with abandon!!!! Thank you!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-22 13:10:36

No Duplicates.

**Comment 34 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Susan  
Last Name: Griffin  
Email Address: sgriffin@pacbell.net  
Affiliation: American Lung Association Volunteer

Subject: In Support of Clean Air  
Comment:

Dear Chairman Nichols,  
Thank you for your leadership on climate change policy and to encourage the California Air Resources Board to support public health by establishing the most ambitious regional greenhouse gas reduction targets possible under SB375. •@  
Establishing strong targets will clearly signal the need for a departure from business as usual sprawl and support more sustainable communities throughout California where residents have healthier, physically active walking, biking or transit alternatives to driving. •@  
Improving California's land use and transportation planning processes to reduce our dependency on driving offers a wide range of benefits to our communities. Along with reducing our ongoing air pollution-related public health crisis and cutting our contributions to climate change, promoting opportunities for daily physical activity will reduce the burdens faced by our children, the elderly and others living with chronic illnesses like asthma, obesity, diabetes and depression. •@  
Please continue to support public health by establishing strong regional greenhouse gas targets

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-22 13:27:05

No Duplicates.

**Comment 35 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Carolyn

Last Name: Martin

Email Address: Marcb76@aol.com

Affiliation:

Subject: SB 375

Comment:

Healthy Communities are essential. Please do not dilute the impact of this key legislation.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-22 13:34:43

No Duplicates.

**Comment 36 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: David

Last Name: Spath

Email Address: Non-web submitted comment

Affiliation:

Subject: SenBill375

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/186-spath.pdf'

Original File Name: Spath.pdf

Date and Time Comment Was Submitted: 2010-06-22 14:19:14

No Duplicates.

**Comment 37 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Michael

Last Name: Dieden

Email Address: Non-web submitted comment

Affiliation:

Subject: SenBill375

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/189-dieden.pdf>'

Original File Name: Dieden.pdf

Date and Time Comment Was Submitted: 2010-06-22 14:30:42

No Duplicates.

**Comment 38 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Dave

Last Name: Cortese

Email Address: Non-web submitted comment

Affiliation:

Subject: SenBill375

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/190-cortese.pdf>'

Original File Name: Cortese.pdf

Date and Time Comment Was Submitted: 2010-06-22 14:32:09

No Duplicates.



**Comment 39 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Johannes

Last Name: Van Tilburg

Email Address: Non-web submitted comment

Affiliation:

Subject: SenBill375

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/192-vantilburg.pdf'

Original File Name: VanTilburg.pdf

Date and Time Comment Was Submitted: 2010-06-22 14:34:45

No Duplicates.

**Comment 40 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Ryan

Last Name: Lehman

Email Address: Non-web submitted comment

Affiliation:

Subject: SenBill375

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/194-lehman.pdf>'

Original File Name: Lehman.pdf

Date and Time Comment Was Submitted: 2010-06-22 14:37:47

No Duplicates.

**Comment 41 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Tom

Last Name: Butt

Email Address: tom.butt@intres.com

Affiliation: Richmond City Council

Subject: Support SB 375 Implementation

Comment:

See attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/196-carb\_letter.pdf'

Original File Name: CARB Letter.pdf

Date and Time Comment Was Submitted: 2010-06-22 14:14:07

No Duplicates.

**Comment 42 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Kurt

Last Name: Tellefsen

Email Address: crowncapital@san.rr.com

Affiliation: Crown Capital Commercial Corp.

Subject: SB 375

Comment:

Please see attachment advocating continued efforts toward successful implementation of sb 375.

Best,  
Kurt Tellefsen

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/210-commercialmortgagesb375-business.docx'

Original File Name: CommercialMortgageSB375-Business.docx

Date and Time Comment Was Submitted: 2010-06-22 16:58:51

No Duplicates.

**Comment 43 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Bill

Last Name: Roschen

Email Address: cpcroschen@rvca.org

Affiliation:

Subject: SB 375

Comment:

See attached letter.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/212-letter\_sb\_375\_062210.pdf'

Original File Name: letter SB 375\_062210.pdf

Date and Time Comment Was Submitted: 2010-06-22 17:38:31

No Duplicates.

**Comment 44 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Dr. Douglas

Last Name: Kerr

Email Address: DrsKerr@pacbell.net

Affiliation:

Subject: Greenhouse Gas Reduction Goals

Comment:

CARB has occasionally been statesmanlike in its courage and farsightedness when combating greenhouse gas emissions in our state.

Now is the time to be statesmanlike again.

There is very little time left. We all know the statistics about the costs of sea level rise and the lives that are, and will be, lost because of pollution. Those lives now include whole species.

It will take courage and farsightedness to establish aggressive greenhouse gas reduction goals which override the cries from the lobbies with which we are all familiar.

But its their welfare versus the public's. And it is their welfare versus the American public's, because our state has the proud tradition of leading America in bravely establishing necessary though controversial public policy.

Now is the time to demonstrate your statesmanship again--the time to establish aggressive goals for greenhouse gas reduction in California.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-22 22:28:01

No Duplicates.

**Comment 45 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Jim  
Last Name: Howard  
Email Address: jthoward3@gmail.com  
Affiliation:

Subject: Set High Targets Under SB 375  
Comment:

Dear Chairman Nichols,

I would like to encourage the California Air Resources Board to set high standards as possible under SB375. ~~~

Setting high standards will reinforce the need for different approach towards development throughout California. We need alternatives to continuing sprawl. ~~~

Improving California's land use and transportation planning processes will reduce greenhouse gases and provide many additional public health benefits to our communities by reducing air pollution.~~~

Please continue to support public health by establishing strong regional greenhouse gas targets.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-23 08:00:15

No Duplicates.

**Comment 46 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Sebastian

Last Name: Martin

Email Address: sebmartin@gmail.com

Affiliation:

Subject: Set ambitious greenhouse gas reduction targets

Comment:

Dear Air Resources Board member,

Please adopt ambitious greenhouse gas reduction targets for SB 375. I would like to see my community become more walkable and less congested, and I would like to see more transit and housing options for all residents.

I understand that one of the best ways to ensure communities grow in a sustainable way is to set ambitious greenhouse gas reduction goals at the regional level. I recognize that it may take a little time for the reductions to take effect, but the benefits will be invaluable to my community for generations to come.

Sincerely,

Sebastian Martin

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-23 10:06:48

82 Duplicates.



## **Comment 47 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Elyse

Last Name: Lowe

Email Address: ELowe@MoveSanDiego.org

Affiliation: Executive Director, Move San Diego

Subject: re: June 24, 2010 CARB Agenda item 10-6-6 -Target Setting Efforts under Senate Bill 375

Comment:

June 18, 2010

Honorable Supervisor Roberts:

As the San Diego area representative on the California Air Resources Board (CARB), you are acutely aware how the statewide conversations have been shaping up on setting Green House Gas (GhG) emission reductions targets. Move San Diego is impressed by SANDAG's willingness to aim for the highest draft reduction targets of any MPO, but as the region with the highest per capita GhG emissions overall, it makes sense for our region to strive for the largest percent decrease.

Move San Diego would like to see the SANDAG regional GhG target for 2035 improve upon reductions made in 2020. Unfortunately, the 2035 target proposed by SANDAG is less ambitious than 2020. With substantial future development set to occur in smart growth areas your district, we ask that you consider the following points in justifying ambitious targets for 2020 and 2035.

Strong Targets Will Spur New and More Efficient Construction:

- With strong targets, SANDAG will adopt regional plans that continue to focus growth, and developers will be likely to pursue projects exempt from the often time-consuming and costly CEQA review process.
- Rehabilitation of existing roads and buildings promotes construction jobs. A comparison of 155 metropolitan areas found that over a ten year period, areas with focused growth policies generated nearly \$100,000 more per new resident in construction activity than areas with growth policies that facilitated sprawl or decentralization.
- Transit Oriented Development around projects such as the new extension of the Mid Coast Light Rail will have the opportunity to be developed as Transit Priority Projects with CEQA exemptions.

Access to New Funding Sources:

San Diego is well poised to lead, making us more competitive for federal and state funds, and ensuring we use those funds well. The California Strategic Growth Council will allocate \$60 million in grants to cities, counties and MPOs for planning activities.

Activities consistent with SB 375 are eligible for this funding putting San Diego in a great place to utilize this resource. Federally, the new Office of Sustainable Communities is offering \$100 million in Sustainable Communities Planning Grants through an initiative designed to promote regional planning efforts that integrate housing and transportation decisions. The City of San Diego's Housing Commission is looking at this very closely as potential means to support new low income housing /transit oriented development in its work plan. SB 375 has given California a head start, and an ambitious target now will ensure the San Diego region increases its lead.

#### Housing Location Efficiency:

- Market trends show that people want and are willing to pay more for homes where they can walk or take public transit. A 2007 survey from the National Association of Realtors shows that 83 percent of Americans support building communities where people can walk places and use their cars less.
- This shift to city-centered growth is already happening in California, and SB 375 will help cities meet this demand. The City of San Diego will take the bulk of the infill growth projected, from a total of four hundred thousand units to be developed throughout the region by 2050. SB 375 provides more certainty and stronger incentives for developers looking to take advantage of this trend.
- While there is no silver bullet in the fight against climate change, compact development is emerging as an important tool in the climate and energy toolbox.

#### Transit Supportive Land Uses:

Higher targets will certainly help create more compact infill developments centered around transit - and that is what transit needs to be more successful in the region. Our transit systems need larger percentages of people who can walk easily to fast, modern efficient transit services. SANDAG's new Urban Area Transit Strategy will be greatly supported by keeping ambitious, but achievable targets in play.

Thank you for taking a leadership role in pushing for ambitious targets for SANDAG. If you have any questions, please don't hesitate to contact me at (858) 204-6545 or [elowe@movesandiego.org](mailto:elowe@movesandiego.org).

Sincerely,

Elyse Lowe  
Move San Diego  
Executive Director

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/251-movesdrobertscarbtargetsjune2010.pdf>'

Original File Name: MoveSDRobertsCARBTargetsJune2010.pdf

Date and Time Comment Was Submitted: 2010-06-23 09:53:11

No Duplicates.



**Comment 48 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: David

Last Name: Boyer

Email Address: david.boyer@stanfordalumni.org

Affiliation:

Subject: Support public health by establishing strong regional greenhouse gas targets

Comment:

Dear Chairman Nichols,

I am writing to thank you for your leadership on climate change policy and to encourage the California Air Resources Board to support public health by establishing the most ambitious regional greenhouse gas reduction targets possible under SB375. 

Establishing strong targets will clearly signal the need for a departure from business as usual sprawl and support more sustainable communities throughout California where residents have healthier, physically active walking, biking or transit alternatives to driving. 

Improving Californias land use and transportation planning processes to reduce our dependency on driving offers a wide range of benefits to our communities. Along with reducing our ongoing air pollution-related public health crisis and cutting our contributions to climate change, promoting opportunities for daily physical activity will reduce the burdens faced by our children, the elderly and others living with chronic illnesses like asthma, obesity, diabetes and depression. 

Please continue to support public health by establishing strong regional greenhouse gas targets.

Sincerely,

David Boyer

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-23 10:22:40

No Duplicates.

**Comment 49 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Gloria

Last Name: Molina

Email Address: Non-web submitted comment

Affiliation:

Subject: Board of Supervisors County of Los Angeles

Comment:

please see attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/254-gloria.pdf>'

Original File Name: Gloria.pdf

Date and Time Comment Was Submitted: 2010-06-23 10:37:18

No Duplicates.

**Comment 50 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Ed P.

Last Name: Reyes

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Los Angeles

Comment:

please see attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/255-reyes.pdf>'

Original File Name: reyes.pdf

Date and Time Comment Was Submitted: 2010-06-23 10:38:39

No Duplicates.

**Comment 51 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Glean

Last Name: Davis

Email Address: gleam.davis@smgov.net

Affiliation:

Subject: City of Santa Monica

Comment:

please see attached

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/256-davis.pdf'

Original File Name: davis.pdf

Date and Time Comment Was Submitted: 2010-06-23 10:38:39

No Duplicates.

## **Comment 52 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Dennis

Last Name: Zane

Email Address: dennyzane@movela.org

Affiliation:

Subject: SB 375

Comment:

June 23, 2010

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Support for implementation of SB 375

Dear Chairwoman Mary Nichols, Board Members and CARB Staff:

Move LA is the business-labor-environmental coalition that was behind the passage of the Measure R sales tax in Los Angeles County, which dedicates about \$30 billion for the development of a dozen rail and bus lines over 30 years. Move LA is now working with the local and federal governments to find ways to finance all 30 years of projects in 10 years. We believe this kind of aggressive transit investment will begin to make Los Angeles County more sustainable by providing families with more transportation choices - choices that help reduce traffic congestion as well as greenhouse gas emissions.

The voters of LA County stepped up and voted to tax themselves - even as the worst recession in a century was bearing down upon us - in order to redress the imbalances in policy and funding that have made investing in roads easy and investing in transit hard. Families need more transportation options - to ease the burden of rising transportation costs and to protect them against the uncertainty of gas prices in the future.

SB 375 helps the Southern California region address all of these problems and to accommodate population growth in a way that will mitigate the impact of growth without diminishing quality of life.

SB 375 offers communities incentives to plan and develop in a way that will allow for more efficient land use and distribution of infrastructure and municipal services. It will do this by encouraging the development of neighborhoods that provide more transportation and housing choices for households of all income levels and ages, from first-time renters and buyers to empty nesters.



SB 375 will help support public transit by encouraging development near transit lines and stations, thereby making transit more convenient, and by correcting the jobs-housing imbalance in communities, thereby making it more likely that commuters can get there by transit - or on foot or by bike.

The economic recession and Gulf oil spill, as well as the state's budget problems, prove how badly we need to set a new and more sustainable course. SB 375 provides the incentives. The rest of the country, and the world, is watching to see it work.

Sincerely

Denny Zane  
Executive Director  
Move LA

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-23 10:47:27

No Duplicates.

**Comment 53 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Pam  
Last Name: O'Connor  
Email Address: pam.oconnor@smgov.net  
Affiliation: Mayor Pro Tempore, City of Santa Monica

Subject: Support for Implementation of SB 375  
Comment:

Good Morning Chair Nichols, CARB Board Members and CARB Staff:

Attached please find a letter supporting implementation of SB 375 from Pam O'Connor, Mayor Pro Tempore, City of Santa Monica. This letter was faxed to the CARB office this morning.

Many thanks,

Bridget Stermer  
Executive Administrative Assistant  
Santa Monica City Manager's Office  
310-458-8301  
Bridget.stermer@smgov.net

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/258-sb\\_375\\_support\\_6.23.10.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/258-sb_375_support_6.23.10.pdf)'

Original File Name: SB 375 Support 6.23.10.pdf

Date and Time Comment Was Submitted: 2010-06-23 10:54:56

No Duplicates.

**Comment 54 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Kelly

Last Name: Seiler

Email Address: kelly.seiler@gmail.com

Affiliation:

Subject: Please set ambitious GHG reduction targets!

Comment:

Carbon has a price that we aren't paying directly. If we start paying the price when we get the energy then the free market will change which products are most desirable. Lets make our communities healthier!

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-23 11:01:32

No Duplicates.

**Comment 55 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Carey  
Last Name: Knecht  
Email Address: carey@climateplanca.org  
Affiliation: ClimatePlan

Subject: SB 375

Comment:

Thank you very much for your ongoing work to implement SB 375.  
Please accept the attached letter, submitted on behalf of its  
thirty signatories.

Sincerely,

Carey Knecht  
ClimatePlan

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/262-cp\_carb\_mposubmissions\_june9.pdf'

Original File Name: CP\_CARB\_mposubmissions\_June9.pdf

Date and Time Comment Was Submitted: 2010-06-23 11:24:29

No Duplicates.

## **Comment 56 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Bill  
Last Name: Broz  
Email Address: wbroz@comcast.net  
Affiliation:

Subject: SB 375  
Comment:

Dear Chairwoman Mary Nichols, Board Members and CARB Staff:

I stongly support SB 375. Here's why:

- It leverages smart growth strategies such as transit-oriented development and mixed-use to get real, measurable implementation of our state's climate-change statute (AB32)
- It fosters livable urban density. That is inherently a "green" strategy, as cities use our limited resources more efficiently than any other form of human development.
- In addition to helping clean up our air, the TOD aspect in particular will get cars off the road and foster more-effient (and more pleasant!) rail travel

There's one other thing. I've seen it work. As a native of Washington state, over the last 25 years I've seen their Growth Management Act effectively concentrate development and transportation structures into identified urban corridors. Seattle (my home town) and other large cities are all the more livable because of it.

So California can take a cue from its neighbor to the north. But it's time for us once again to exert national leadership in sustainable development. That is our legacy - and our future.

Sincerely,

Bill Broz

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-23 11:18:44

No Duplicates.

## **Comment 57 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Terry  
Last Name: O'Day  
Email Address: today@environmentnow.org  
Affiliation: Environment Now

Subject: MPO Scenarios and SB 375 targets  
Comment:

June 22, 2010

Mary Nichols, Chairman  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Re: MPO Scenarios and SB 375 targets

Dear Chairman Nichols,

Environment Now (EN) greatly appreciates the extensive work that CARB, the Regional Targets Advisory Committee (RTAC), and the Metropolitan Planning Organizations (MPOs) have done to implement SB 375. The planning scenarios created by the MPOs offer a wide range of approaches to improve land use and transportation planning to reduce greenhouse gas emissions (GHG) and improve air quality, public health, housing options, and transportation choices in California.

Moving forward, we urge you to ensure that regions adopt truly ambitious targets and move away from business as usual. While there are many good examples of planning tools in the MPO scenarios that could be applied statewide, we also believe that each region can do more. None of the scenarios include highway or road networks that are different than already adopted Regional Transportation Plans. Truly ambitious targets would encourage more: (1) housing growth in urbanized infill areas; (2) transit, highway, biking, and walking infrastructure investments; and (3) aggressive pricing measures before and beyond 2020. CARB should consider developing and modeling an 'all-star' scenario that draws from all of the MPOs' submissions, highlighting the best of each and applying those policies/practices across regions.

CARB should carefully evaluate the MPO travel models use in the scenarios to ensure that GHG benefits fully account for non-motorized travel (walking and biking). Many of the models used by MPOs underestimate these benefits.

We request CARB identify (and include in the draft targets) a set of performance indicators that address social equity, jobs-housing fit, public health, land consumption, and other important outcomes. We believe that the scenarios and draft targets currently fall short of meeting the RTAC's recommendations on this subject. Especially in this economy, strategies that could reduce GHG

emissions while achieving economic benefits for working families, such as increasing jobs-housing fit and expanding low-cost transportation choices, should be prioritized.

CARB should ensure that 2035 targets are a step forward, not backward. Most of MPO scenarios predict lower levels of GHG savings in 2035 when compared to 2020 despite the fact that most empirical evidence says just the opposite. CARB should look carefully at the models and scenarios to correct this problem.

We recognize that California's regions and municipalities face many challenges. The draft targets must be responsive to the current economic situation, however establishing targets that are truly ambitious and achievable (especially for the 2035 timeframe) is needed to motivate local and regional governments to actively develop a shared blueprint to improve planning and create a better future.

Again, thank you for the extensive work you have done.

Sincerely,

Terry O'Day  
Executive Director

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/264-final\\_en\\_letter\\_sb375\\_arb\\_6.22.10.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/264-final_en_letter_sb375_arb_6.22.10.doc)'

Original File Name: FINAL EN Letter SB375 ARB 6.22.10.doc

Date and Time Comment Was Submitted: 2010-06-23 11:24:26

No Duplicates.

## **Comment 58 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Moule &  
Last Name: Polyzoides  
Email Address: layre-smith@mparchitects.com  
Affiliation: Architects and Urbanists

Subject: Supporting SB 375  
Comment:

June 23, 2010

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
FAX: 916-327-5748

Re: Support for implementation of SB 375

Dear Chairwoman Mary Nichols, Board Members and CARB Staff:

As co-founders of the Congress for the New Urbanism, this country's leading organization promoting walkable mixed-use neighborhood development, we urge you to set ambitious targets for greenhouse gas emissions through SB 375. The oil spill in the Gulf demonstrates that the real cost of our oil dependence is much higher than what we pay at the pump, and SB 375 finally provides the impetus we need to build the neighborhoods and the transportation system that will free us from dependence on foreign oil. Strong implementation of SB 375 will also help the region offset the impact of population growth on quality of life by addressing all the problems long associated with Southern California's infamous sprawl -including traffic congestion, the burden of rising housing and transportation costs on families, declining air quality and climate change.

SB 375 will begin the CEQA reform necessary to remove the barriers to infill and transit-oriented development, thus leveling the playing field for the building industry and helping to maintain a balance between infill and greenfield development. The law helps provide certainty for developers as well as for neighborhood residents about where development is supposed to occur - thereby making development less contentious and the planning and permitting process less expensive. And SB 375 will improve the allocation of transportation funding according to density and need, thereby easing traffic problems in existing neighborhoods. By promoting a better jobs-housing balance SB 375 will also help reduce the time people must spend commuting - allowing them to instead spend the time with family and friends.

Bottom line, SB 375 helps California accommodate growth in ways that are economically sound, environmentally responsible and socially beneficial. The state needs to set a new and more sustainable course now more than ever. Don't back down from enforcing the law.



Sincerely,

Elizabeth Moule & Stefanos Polyzoides

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/265-sb\_375\_-\_moule\_\_\_\_polyzoides.pdf'

Original File Name: SB 375 - Moule & Polyzoides.pdf

Date and Time Comment Was Submitted: 2010-06-23 11:30:04

No Duplicates.

**Comment 59 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Jenny

Last Name: Bard

Email Address: jbard@alac.org

Affiliation:

Subject: Public Health Letter for Ambitious SB 375 Targets

Comment:

Attached please find a letter signed by 27 public health and medical organizations in California in support of ambitious targets for SB 375.

Sincerely,

Jenny Bard

Regional Air Quality Director

American Lung Association in California

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/266-public\_health\_ltr\_to\_carb\_sb\_375.pdf'

Original File Name: Public Health ltr to CARB SB 375.pdf

Date and Time Comment Was Submitted: 2010-06-23 11:37:13

No Duplicates.

**Comment 60 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Beth

Last Name: Krom

Email Address: bkrom@cityofirvine.org

Affiliation: City of Irvine

Subject: SB 375 Support

Comment:

Please contact Caryn Puma at (949) 724-6226 or  
cpuma@cityofirvine.org if you have problems with the attached file.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/267-sb\_375\_support-councilmember\_krom.pdf'

Original File Name: SB 375 Support-Councilmember Krom.pdf

Date and Time Comment Was Submitted: 2010-06-23 11:30:29

No Duplicates.

**Comment 61 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: John  
Last Name: Given  
Email Address: jgiven@cimgroup.com  
Affiliation: CIM Group

Subject: SB375 Implementation  
Comment:

Support SB375 implementation and recommendations of ULI

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/268-sb375\_letter\_to\_carb.pdf'

Original File Name: SB375 Letter to CARB.pdf

Date and Time Comment Was Submitted: 2010-06-23 11:32:16

No Duplicates.

**Comment 62 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Hannah  
Last Name: Cohen  
Email Address: hsc1@cox.net  
Affiliation: Sustainable San Diego

Subject: Target Setting Efforts Under Senate Bill 375  
Comment:

The attached letter are the comments of Sustainable San Diego, a collaborative of 37 agencies and individuals, and other supporters regarding the SANDAG target setting and modeling efforts. We are aware of the technical analysis that is being submitted regarding SANDAG and support its conclusions, but we also want to urge CARB to view the entire target-setting process through the lens of social equity.

Hannah Cohen  
Consultant  
Sustainable San Diego  
6191.203.7324

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/269-carb\_letter\_sandag\_june\_10\_final\_\_2\_.pdf'

Original File Name: CARB letter SANDAG June\_10 final (2).pdf

Date and Time Comment Was Submitted: 2010-06-23 11:21:35

No Duplicates.

**Comment 63 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

**Comment 64 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Peter Hathaway, Davi  
Last Name: Norm Marshall for Cl  
Email Address: info@climateplan.org  
Affiliation:

Subject: Comments on SB 375 targets  
Comment:

Please find attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/271-big4mpo\_analysis\_june\_23-\_final.pdf'

Original File Name: Big4MPO analysis June 23- FINAL.pdf

Date and Time Comment Was Submitted: 2010-06-23 11:48:32

No Duplicates.

**Comment 65 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Julia

Last Name: Gardiner

Email Address: [jgardiner@tnc.org](mailto:jgardiner@tnc.org)

Affiliation: The Nature Conservancy

Subject: SB 375 targets and natural resource conservation

Comment:

Please see the attached letter from 6 groups.

Attachment: '[https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/272-062310\\_letter\\_to\\_carb\\_sb375\\_targets\\_and\\_conservation.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/272-062310_letter_to_carb_sb375_targets_and_conservation.pdf)'

Original File Name: 062310 letter to CARB SB375 targets and conservation.pdf

Date and Time Comment Was Submitted: 2010-06-23 11:53:26

No Duplicates.



**Comment 66 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Tom  
Last Name: LaBonge  
Email Address: Councilmember.labonge@lacity.org  
Affiliation: Los Angeles City Council

Subject: I support SB375

Comment:

I encourage the California Air Resources Board to pursue vigorous implementation of SB 375 (Steinberg). This legislation will help California lead the way in reducing greenhouse gases from implementation of aggressive transit programs and encouraging smart growth and Transit Oriented Developments. Such programs not only generate excellent environmental outcomes, they are smart economic development policy as well. More jobs, cleaner air, fighting climate change. All should be priorities in California.

Thank you

Councilmember Tom LaBonge  
Los Angeles Council District Four  
Councilmember.LaBonge@lacity.org  
213-485-3337

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-23 11:53:47

No Duplicates.

**Comment 67 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Beth

Last Name: Steckler

Email Address: sbsteckler@gmail.com

Affiliation:

Subject: Use this version instead of earlier one submitted

Comment:

Please use this version rather than the one submitted a few minutes ago. Thank you.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/274-soca\_june\_sign\_on\_to\_carb\_final.pdf'

Original File Name: SoCA June sign on to CARB final.pdf

Date and Time Comment Was Submitted: 2010-06-23 11:57:10

No Duplicates.

## **Comment 68 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Alia

Last Name: Anderson

Email Address: aanderson@reconnectingamerica.org

Affiliation: Reconnecting America

Subject: Support for implementation of SB 375

Comment:

June 23, 2010

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Support for implementation of SB 375

Dear Chairwoman Mary Nichols, Board Members and CARB Staff:

Reconnecting America and its Center for Transit-Oriented Development has been promoting best practices in transit-oriented development for almost a decade, and we know how important it is to level the playing field between transit and highway development on the one hand, and between infill and greenfield development on the other. Both federal and state policies incentivize highway building and suburban greenfield development, beginning with the local match required for transit and the home mortgage tax deduction for those who own their own homes. SB 375 is perhaps most important because it begins to redress that imbalance by making infill and transit-oriented development easier, and less time-consuming and costly, and because it improves the allocation of transportation funding according to density and need.

California and the rest of the country need to re-examine the policies and incentives that have made sprawling highway and suburban development the norm â€" a course that helped build this country but that isnâ€™t working anymore. We must begin to address the problems long associated with sprawl â€" including traffic congestion, declining air quality, and the burden of rising housing and transportation costs on families. SB 375 begins to do this by aligning regional planning, transportation funding and environmental policy, by promoting a jobs-housing balance, by beginning the reform of CEQA, and by allowing the market to respond to the growing demand from first-time renters and buyers as well as empty nesters. SB 375 provides for the sustainable accommodation of population growth in a way that will improve, not worsen, quality of life.

The ambitious implementation of SB 375 will benefit our economy and our communities in so many ways that we canâ€™t afford to not implement this law. We urge the ARB to adopt ambitious greenhouse gas reduction targets, especially for 2035, in order to put our communities on a path to prosperity.

Sincerely,

Allison Brooks  
Chief of Staff  
Reconnecting America

436 14th Street, Suite 1005  
Oakland, CA 94612

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-23 11:50:37

No Duplicates.

**Comment 69 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Darrel  
Last Name: Malamut  
Email Address: darrelm@jsmcompanies.com  
Affiliation:

Subject: SB 375 (Steinberg)  
Comment:

I encourage the California Air Resources Board to pursue vigorous implementation of SB 375 (Steinberg). This legislation will help California lead the way in reducing greenhouse gases from implementation of aggressive transit programs and encouraging smart growth and Transit Oriented Development. Such programs not only generate excellent environmental outcomes, they are smart economic development policy as well. More jobs, cleaner air, fighting climate change. All should be priorities in California.

Thank you,

Darrel Malamut  
JSM Capital, LLC

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2010-06-23 12:01:03

No Duplicates.

**Comment 70 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: ralph

Last Name: kachadourian

Email Address: rkachadourian@ci.sanger.ca.us

Affiliation:

Subject: Support for Implementation of SB 375

Comment:

See attached letter

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/tirepres09/254-sb375\_small\_communities\_support\_ltr.pdf'

Original File Name: SB375 Small Communities Support Ltr.pdf

Date and Time Comment Was Submitted: 2010-06-23 12:25:57

No Duplicates.

**Comment 71 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: David

Last Name: Malamut

Email Address: Non-web submitted comment

Affiliation:

Subject: JSM

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/279-malamut.pdf>'

Original File Name: malamut.pdf

Date and Time Comment Was Submitted: 2010-06-23 13:27:23

No Duplicates.

**Comment 72 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Renata

Last Name: Simril

Email Address: Non-web submitted comment

Affiliation:

Subject: Forest City

Comment:

Please see attached.

Attachment: 'https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/280-simril.pdf'

Original File Name: simril.pdf

Date and Time Comment Was Submitted: 2010-06-23 13:46:06

No Duplicates.



**Comment 73 for Target Setting Efforts Under Senate Bill 375 (senbill375) - Non-Reg.**

First Name: Terry

Last Name: O'Day

Email Address: Non-web submitted comment

Affiliation:

Subject: Santa Monica

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/281-oday.pdf>'

Original File Name: Oday.pdf

Date and Time Comment Was Submitted: 2010-06-23 16:09:27

No Duplicates.

**Comment 1 for Target Setting Efforts Under Senate Bill 375 (senbill375). (At Hearing)**

First Name: Mary

Last Name: Michal-Rawling

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Merced

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/282-mary.pdf>

Original File Name: Mary.pdf

Date and Time Comment Was Submitted: 2010-06-25 12:37:56

No Duplicates.

**Comment 2 for Target Setting Efforts Under Senate Bill 375 (senbill375). (At Hearing)**

First Name: Steve

Last Name: Cohn

Email Address: scohn@cityofsacramento.org

Affiliation:

Subject: City of Sacramento

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/283-steve.pdf>

Original File Name: Steve.pdf

Date and Time Comment Was Submitted: 2010-06-25 12:37:56

No Duplicates.

**Comment 3 for Target Setting Efforts Under Senate Bill 375 (senbill375). (At Hearing)**

First Name: Katherine

Last Name: Perez

Email Address: Non-web submitted comment

Affiliation:

Subject: ULI Los Angeles

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/284-katherine.pdf>

Original File Name: katherine.pdf

Date and Time Comment Was Submitted: 2010-06-25 12:37:56

No Duplicates.

**Comment 4 for Target Setting Efforts Under Senate Bill 375 (senbill375). (At Hearing)**

First Name: Jim

Last Name: Wunderman

Email Address: Non-web submitted comment

Affiliation:

Subject: Bay Area Council

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/285-jim.pdf>

Original File Name: Jim.pdf

Date and Time Comment Was Submitted: 2010-06-25 12:37:56

No Duplicates.

**Comment 5 for Target Setting Efforts Under Senate Bill 375 (senbill375). (At Hearing)**

First Name: Dave

Last Name: Davis

Email Address: Non-web submitted comment

Affiliation:

Subject: Community Environmental Council

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/286-dave.pdf>

Original File Name: Dave.pdf

Date and Time Comment Was Submitted: 2010-06-25 12:37:56

No Duplicates.

**Comment 6 for Target Setting Efforts Under Senate Bill 375 (senbill375). (At Hearing)**

First Name: Joe

Last Name: DiStefano

Email Address: Non-web submitted comment

Affiliation:

Subject: Calthrope Associates

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/287-joe.pdf>

Original File Name: Joe.pdf

Date and Time Comment Was Submitted: 2010-06-25 12:37:56

No Duplicates.

**Comment 7 for Target Setting Efforts Under Senate Bill 375 (senbill375). (At Hearing)**

First Name: Gary

Last Name: Liss

Email Address: Non-web submitted comment

Affiliation:

Subject: City of Loomis

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/288-gary.pdf>

Original File Name: Gary.pdf

Date and Time Comment Was Submitted: 2010-06-25 12:37:56

No Duplicates.



**Comment 8 for Target Setting Efforts Under Senate Bill 375 (senbill375). (At Hearing)**

First Name: Sandi

Last Name: Palumbo

Email Address: info@fmms.org

Affiliation:

Subject: Fresno-Madera Society County Medical Society

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/289-sandi.pdf>

Original File Name: Sandi.pdf

Date and Time Comment Was Submitted: 2010-06-25 12:37:56

No Duplicates.

**Comment 9 for Target Setting Efforts Under Senate Bill 375 (senbill375). (At Hearing)**

First Name: Autumn

Last Name: Bernstein

Email Address: Non-web submitted comment

Affiliation:

Subject: SASC

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/290-autumn.pdf>

Original File Name: Autumn.pdf

Date and Time Comment Was Submitted: 2010-06-25 12:37:56

No Duplicates.

**Comment 10 for Target Setting Efforts Under Senate Bill 375 (senbill375).  
(At Hearing)**

First Name: Will

Last Name: Barrett

Email Address: WBarrett@alac.org

Affiliation:

Subject: American Lung Association

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/senbill375/291-will.pdf>

Original File Name: Will.pdf

Date and Time Comment Was Submitted: 2010-06-25 14:54:24

No Duplicates.