

**Comment 1 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: J

Last Name: Barrett

Email Address: jbarret1@sonoma-county.org

Affiliation:

Subject: VMT

Comment:

Using VMT as a metric for reductions in GHG does not make sense to me. We can dramatically reduce our GHG emissions through more fuel efficient cars without changing the VMT. While VMT is a good measure for how compact development patterns work, for evaluating jobs/housing balance and other factors, it doesn't really measure emissions and should not be the metric for determining how transportation funds are spent. A better metric for GHG emissions would be fuel sales. This would measure more directly the emissions from transportation sectors by area and help us to calibrate our models and better understand the relationships between land use, density and transportation demand.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-11 18:42:36

No Duplicates.

**Comment 2 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Malcolm  
Last Name: Gaffney  
Email Address: malgaff@gmail.com  
Affiliation:

Subject: sb375-general-ws  
Comment:

Please pass this piece of legislation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-04-03 12:51:23

No Duplicates.

**Comment 3 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Lewis  
Last Name: Lem  
Email Address: Lem.JFA@gmail.com  
Affiliation: JFA and CCS

Subject: VMT reduction data from New York State  
Comment:

Dear CARB Staff:

Please find attached a set of slides showing summary data and results for ongoing New York State work.

I would be glad to provide more information if it would be helpful to CARB and the RTAC.

Thank you,

Lewison Lem, Ph.D.  
Principal Consultant  
Jack Faucett Associates  
Center for Climate Strategies  
Lem.JFA@gmail.com  
415-513-8040

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/5-carb\\_rtac\\_nys\\_summary\\_slides.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/5-carb_rtac_nys_summary_slides.pdf)

Original File Name: CARB RTAC NYS Summary Slides.pdf

Date and Time Comment Was Submitted: 2009-05-05 13:10:09

No Duplicates.

**Comment 4 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: sophia  
Last Name: chiang  
Email Address: sophia.akl@gmail.com  
Affiliation:

Subject: vegan food  
Comment:

Hi I think the plan to solve the global warming issue is great!  
however, the fast and the most effective way to stop global warming  
hasn't been addressed which is : BE VEGAN!

Please kindly add it in and i believe it will change the world and  
save the planet quick!

Thank you again for your fantastic work to help to saving our  
Mother Earth!

All the best,

Sophia

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-05 23:39:08

No Duplicates.

**Comment 5 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Ralph

Last Name: Deckard

Email Address: ralphdeckard@verizon.net

Affiliation: n/a

Subject: Wast of tax payer's money

Comment:

We are fed up with all the environmental wacko idea's you nut  
case's come up with,to wast and spend our money,and tell us what to  
do and how to live,get off our back's and out of our wallet's,then  
go get another job.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-08 10:10:51

No Duplicates.

**Comment 6 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Clifford

Last Name: Law

Email Address: accord6@gmail.com

Affiliation:

Subject: Trucks and Big-Rigs

Comment:

I want all business trucks whether small or big, light or not, to have better emissions. These business trucks and big-rigs produce alot of emissions and are unpleasant when fumes come out. It would be great to have a manufacture to make brand new light-weight commercial trucks and big-rigs so that the air is cleaner and that we as Californians don't have to sit in traffic with some truck or big-rig fuming out smelly emissions in front of us. The companies of these trucks and big-rigs should get some type of a rebate or discount for dismantling their old commercial trucks. This is what I and probably a few million Californians really want.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-08 16:30:33

No Duplicates.

**Comment 7 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Walter

Last Name: Vernon

Email Address: olgab@mazzetti.com

Affiliation: Mazzetti Nash Lipsey Burch

Subject: Potential Healthcare Offsets

Comment:

Allow emission offsets to be traded that result from the capture of the halogenated ethers used for anesthetics in hospitals. This can be done for little cost, and is one of the few low-cost alternatives available to healthcare for reducing their global warming impact. It allows a win-win situation; the healthcare organization can reduce its global warming impact at low cost, and monetize these reductions to offset their costs. It makes low-cost offsets available to other industries. It creates a real, long-term reduction in greenhouse gas emissions.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/10-public\\_comment-potential\\_healthcare\\_offsets\\_2\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/10-public_comment-potential_healthcare_offsets_2_.pdf)

Original File Name: Public Comment-Potential Healthcare Offsets(2).pdf

Date and Time Comment Was Submitted: 2009-06-23 13:55:45

No Duplicates.

## **Comment 8 for Comments in general on ARB Implementation of SB 375 (sb375-general-ws) - 1st Workshop.**

First Name: Robert E.  
Last Name: Fisher, MSW  
Email Address: rfisher580@yahoo.com  
Affiliation: UCLA Alumni Assn

Subject: Seek Emergency Regs re: CNG/LNG Pumps at Gasoline Stations  
Comment:

TESTIMONY OF ROBERT E. FISHER, MASTER OF SOCIAL  
WELFARE 1971, THE UNIVERSITY OF CALIFORNIA AT LOS  
ANGELES; AND  
FORMER CITY OF LOS ANGELES LEGISLATIVE ANALYST  
AND REPRESENTATIVE TO THE  
CALIFORNIA COASTAL COMMISSION 1974-1979

Subj: Article About Rising Sea Levels Below:

<http://www.washingtonpost.com/wp-dyn/content/article/2009/06/05/AR2009060501342.html?hpid%3Dmoreheadlines&sub=AR>

There is an urgent need for Emergency Regulations regarding CNG/LNG pumps at gasoline stations for private passenger vehicles due to a dearth of CNG/LNG public fueling sites in California.

Some scientist, below, say that we have only ten years or the year 2030 to mitigate current global warming trends.

It will take too long for the California Air Resources Board (ARB) to adopt Low Carbon Fuel Standards(LCFS) re: Compressed Natural Gas/Liquified Natural Gas (CNG/LNG) via the normal public hearing process.

This is why I advocate the adoption of Emergency Regulations regarding CNG/LNG pumps at existing oil company stations for private vehicle use.

Consider the below:

1.) There is a dearth of public fueling sites for private passenger vehicles in California.

2.) The solution to this problem is tax credits for oil companies to install CNG pumps at their existing gasoline stations. I have requested our Senators Boxer, and Feinstein to sponsor/co-sponsor legislation via the Ways and Means Committee regarding tax credits/incentives for the oil companies to install CNG pumps at



their existing gasoline stations.

Also, this will create thousands of jobs as a by product!

3.) Honda and Toyota continue to produce CNG private passenger vehicles. Except for the Ford Crown Victoria, which is produced en masse for law enforcement, the "Big Three" produced CNG private passenger vehicles until 2005, but discontinued due to a dearth of public fueling sites in the USA,

<http://www.arb.ca.gov/msprog/carpool/carpool.htm>

4.) The oil companies, such as, Shell Oil, BP ,Exxon, Chevron have a natural gas (NG) component in their high end operations. It would not be a problem for such companies to add CNG pumps, but they need incentives to do so.

5.) For the reason above, CNG is the most practical alternative fuel, because;

6.) Most of the other alternative energy biofuels, such as, corn ethanol are out dated and not economically feasible, and are still in the development stage.

7.) Should California fail to adopt LCFS Regulations regarding CNG/LNG as the preferred alternative energy fuel forthwith not only California, but literally, the world would suffer, as a result. See below:

NEED FOR CALIF TO ADOPT CNG/LNG LOW CARBON FUEL STANDARD  
"EMERGENCY" REGULATIONS FORTHWITH :

Below are three pertinent articles about Antarctica's and Greenland's melting ice. It would only take a three foot sea level rise to flood the coastlines, and cities, lowlands and islands of the world:

[http://news.aol.com/article/huge-ice-chunks-break-away-from/452969?icid=sphere\\_news\\_aol\\_inpage](http://news.aol.com/article/huge-ice-chunks-break-away-from/452969?icid=sphere_news_aol_inpage)

<http://news.aol.com/article/sea-level-rise/483569?icid=main|htmlws-main|dl1|link3|http%3A%2F%2Fnews.aol.com%2Farticle%2Fsea-level-rise%2F483569>

[http://news.yahoo.com/s/ap/20090527/ap\\_on\\_go\\_ot/us\\_sci\\_rising\\_seas](http://news.yahoo.com/s/ap/20090527/ap_on_go_ot/us_sci_rising_seas)

Once Greenland's glaciers melts and the Antarctica's Wilkens Ice Shelf completely breaks away, (Chunks have already broken away within the last month) it would enable the Antarctica's glaciers to slide into the sea at a faster rate in the future.

Should the glaciers slide into the sea, there would be a at least a ten meter rise in sea levels that would flood coastlines, cities, states, lowlands, and islands of the world.

Major Cities, such as, San Diego, Long Beach, parts of Los Angeles, Santa Barbara, San Francisco, Oakland, Portland, Seattle, and Vancouver, Canada on the West Coast would be flooded.

Cities, such as, as New York, Boston, Baltimore, Charleston, S.

C., Savannah, GA., Washington, D. C., Jacksonville, Tampa, St. Petersburg, Miami, on the East Coast would be flooded.

The Great Lakes cities, such as, Chicago, Detroit, Cleveland, Toronto, and Toledo would be flooded.

States, such as, Florida, Hawaii and Alaska would be flooded.

The Gulf Coast cities, such as, Mobile, Biloxi, Gulf Port, New Orleans, Houston, Galveston, and Corpus Cristi, would be flooded.

Also, parts of the Netherlands, British Isles, Bermuda, Puerto Rico, the Caribbean Islands, the Mediterranean Rivera, France, Spain, Portugal, Antigua, Bangladesh, Bangkok, Tokyo, Hong Kong, Shanghai, Singapore, the Philippines, Cuba, and parts of Australia, New Zealand, Africa, Central America, Mexico, and South America would be flooded.

I continue to keep you informed re: developments of global warming and its effects on the coastlines, cities, states, lowlands, and islands of the world.

My responsibility is never ending, in keeping with the Board of Regents of the University of California's Alumni's Duties and Responsibilities to the People of the State of California (1983).

by,  
Robert E. Fisher, Master of Social Welfare, 1971  
The University of California at Los Angeles (UCLA)  
Former City of Los Angeles Legislative Analyst/Rep to The  
California Coastal Commission 1974-79

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-06-23 15:45:14

No Duplicates.

**Comment 9 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Alysa  
Last Name: Farris  
Email Address: Alysa6@aol.com  
Affiliation:

Subject: truck idling  
Comment:

Since the law as been put upon me to bake in a sleeper birth truck due to not being able to idle. Or I receive a citation (not my company who owns the truck but ME) if I get caught trying to not die of heat stroke, I am calling for all government offices to turn off all AC and heating. If I am forced to suffer or have my wages extorted from me, I feel the tax payers in this country should not have to pay for your comfort while you are at work. You can at least go home and sleep in comfort. I am forced to try to get some rest in a baking or freezing sleeper, or pay up.STOP WASTEING ENERGY...TURN OFF THAT AIR AND HEAT.

Thank you,  
Alysa Farris

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-07-01 05:06:52

No Duplicates.

**Comment 10 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Brad  
Last Name: Marckwatrd  
Email Address: prestige\_boy@yahoo.com  
Affiliation:

Subject: ZEV lease versus own  
Comment:

Dear Ms. Nichols,

Thank you for taking the time to respond to my email.

I don't see a rational reason to continue with the old lease rules on plug in electric vehicles. It is high time we move into a ZEV world. Rewriting the old ways is a cornerstone of progressing to a new clean energy age.

Please update the existing rules or please send me an explanation why you believe they should remain.

Thanks again.

Brad Marckwardt  
Valencia, California  
prestige\_boy@yahoo.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-07-01 15:48:20

No Duplicates.

**Comment 11 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Carter

Last Name: Mau

Email Address: [lkimura@arb.ca.gov](mailto:lkimura@arb.ca.gov)

Affiliation: Bay Area Rapid Transit (BART)

Subject: Comments on Performance Indicators

Comment:

See attached comment letter received by ARB staff via email 7/28/09 regarding performance indicators as discussed in the 'ARB Staff Discussion Draft: A Method for Setting Performance-based Regional Greenhouse Gas Emission Reduction Targets':  
<http://www.arb.ca.gov/cc/sb375/rtac/meetings/070709/draftframework.pdf>

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/14-carb\\_proposed\\_pi\\_-\\_bart\\_comments\\_\\_09-07-29\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/14-carb_proposed_pi_-_bart_comments__09-07-29_.pdf)

Original File Name: CARB Proposed PI - BART Comments (09-07-29).pdf

Date and Time Comment Was Submitted: 2009-07-29 14:16:58

No Duplicates.

**Comment 12 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: James

Last Name: McClure

Email Address: james.f.mcclure@gmail.com

Affiliation:

Subject: EFFECT ON CONSUMER

Comment:

The standard that is imposed by the existing laws on catalytic converters has arbitrarily excluded all after market manufacture for vehicles within the state. The implementation of the standard invoked January the First has restricted the consumer market to dealer only items that have risen in price by 100 to 300 percent.

In so doing the dealers are now a monopoly and the consumer is at their mercy. We can't all afford hybrids or new cars in a recession.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-10-22 13:42:41

No Duplicates.

## **Comment 13 for Comments in general on ARB Implementation of SB 375 (sb375-general-ws) - 1st Workshop.**

First Name: Jack L  
Last Name: Harrison  
Email Address: jacklha@pacbell.net  
Affiliation: City of Berkeley, Ca.

Subject: adopt the comprehensive recommendations from the Regional Targets Advisory Committee (RTAC)

Comment:

Mary Nichols  
Chair, Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chairwoman Nichols and members of the board:

We urge you to adopt the comprehensive recommendations from the Regional Targets Advisory Committee (RTAC) at your November 19, 2009, meeting. Crafted by a representative group of stakeholders and your able staff, the RTAC report carefully balances greenhouse gas reduction goals with social equity considerations of the impacts on lower-income Californians.

As you know, the Rent Board tries to sustain at least - limited by powerful forces in opposition - at least some measure of affordable rental housing.

People invested in their living space, feeling secure where they are, that they can pay for it, can live in it as long as necessary/desired take good care of their environment. The feeling of citizenry empowerment enables conscientious behavior, even going an 'extra mile', maybe even in the form of voluntary monetary expenditure, to maintain the better living arrangement that benefits themselves and their neighbors, including Earth.

Obviously different living circumstances are essential in order to avail opportunities for conscientious living; good job opportunities close to home is the most difficult, especially since so much work - jobs - depend on polluting behavior themselves. But we need to think in broad views rather than contain our considerations to the narrow range allowed us by the present production system - so much of which is based on that hugely destructive fundamental, growth.

Growth relates to profit by a few people. Our outlook is for care for most of us by most of us, including gentle care of Earth. If you are able to include this idea in your work you will do much to contribute to whatever salvation possibilities still exist.

Although supportive of the report as a whole, we urge your particular consideration of the following recommendations:

1. Metropolitan Planning Organizations (MPOs) should update their data collection and modeling to quantify the greenhouse gas



reduction impacts of housing affordability, gentrification, and jobs-housing fit. As defined in the report, "jobs-housing fit" is the extent to which the rents and mortgages in a community are affordable to people who work there. In theory, a stronger jobs-housing fit should allow Californians to reduce their commute times and distances. However, this link needs to be tested and quantified, as do the links between home affordability generally and gentrification.

2. Performance measures for the sustainable communities strategy should include the jobs-housing fit and 5 other housing-related measures.

3. MPOs' progress in meeting goals should be measured through modeling and other sound scientific approaches.

4. The co-benefits of greenhouse gas reductions should be measured and reported.

We appreciate your consideration of our views.

Sincerely,  
Jack L Harrison

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/17-ecocity\\_world\\_summit\\_2009\\_istanbul\\_at\\_lutfi\\_kyrdar\\_\\_sunday\\_december\\_13\\_\\_2009\\_\\_-\\_upcoming.mht.docx](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/17-ecocity_world_summit_2009_istanbul_at_lutfi_kyrdar__sunday_december_13__2009__-_upcoming.mht.docx)

Original File Name: Ecocity World Summit 2009 Istanbul at Lutfi Kyrdar (Sunday December 13, 2009) - Upcoming.mht.docx

Date and Time Comment Was Submitted: 2009-11-03 11:34:05

No Duplicates.

## **Comment 14 for Comments in general on ARB Implementation of SB 375 (sb375-general-ws) - 1st Workshop.**

First Name: Collin

Last Name: Rich

Email Address: crich@enterprisecommunity.org

Affiliation:

Subject: Adopt the comprehensive recommendations from the RTAC at your Nov 19th Meeting  
Comment:

November 3, 2009

Mary Nichols  
Chair, Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chairwoman Nichols and members of the board:

I urge you to adopt the comprehensive recommendations from the Regional Targets Advisory Committee (RTAC) at your November 19, 2009, meeting. Crafted by a representative group of stakeholders and your able staff, the RTAC report carefully balances greenhouse gas reduction goals with social equity considerations of the impacts on lower-income Californians.

I work for an organization that helps develop affordable housing. My role is to ensure that the projects we support, both new construction and rehab, are 'green' (save energy and water, create a healthier living environment, and reduce environmental impact). Through my work, I have seen that affordable and green housing can be one in the same, and that affordable housing residents are most in need of these benefits.

Although supportive of the report as a whole, I urge your particular consideration of the following recommendations:

1. Metropolitan Planning Organizations (MPOs) should update their data collection and modeling to quantify the greenhouse gas reduction impacts of housing affordability, gentrification, and jobs-housing fit. As defined in the report, "jobs-housing fit" is the extent to which the rents and mortgages in a community are affordable to people who work there. In theory, a stronger jobs-housing fit should allow Californians to reduce their commute times and distances. However, this link needs to be tested and quantified, as do the links between home affordability generally and gentrification.
2. Performance measures for the sustainable communities strategy should include the jobs-housing fit and 5 other housing-related measures.
3. MPOs' progress in meeting goals should be measured through modeling and other sound scientific approaches.
4. The co-benefits of greenhouse gas reductions should be measured and reported.

We appreciate your consideration of our views.

Sincerely,  
Collin Rich  
Green Program Office

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-03 13:55:58

No Duplicates.

## **Comment 15 for Comments in general on ARB Implementation of SB 375 (sb375-general-ws) - 1st Workshop.**

First Name: Chris

Last Name: Mohr

Email Address: cmohr@hlcsmc.org

Affiliation: Housing Leadership Council-San Mateo Co.

Subject: Comments on ARB's implementation of SB 375: housing & GHG reduction  
Comment:

Mary Nichols  
Chair, Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chairwoman Nichols and members of the board:

The Housing Leadership Council of San Mateo County (HLC) urges you to adopt the comprehensive recommendations from the Regional Targets Advisory Committee (RTAC) at your November 19, 2009, meeting. Crafted by a representative group of stakeholders and your able staff, the RTAC report carefully balances greenhouse gas reduction goals with social equity considerations of the impacts on lower-income Californians.

A nonprofit membership organization founded in 2001, HLC works to accelerate the creation of new homes at all affordability levels in San Mateo County to create opportunities and a viable quality of life. We believe housing for everyone strengthens our community. HLC's vision is that people who work, live, or grow up in San Mateo County will have the opportunity to reside here. It is critically important to provide sufficient homes for the jobs provided here, and the result will be a cleaner environment as well as a more balanced housing market.

We support your particular consideration of the following recommendations from Housing California:

1. Metropolitan Planning Organizations (MPOs) should update their data collection and modeling to quantify the greenhouse gas reduction impacts of housing affordability, gentrification, and jobs-housing fit. As defined in the report, "jobs-housing fit" is the extent to which the rents and mortgages in a community are affordable to people who work there. In theory, a stronger jobs-housing fit should allow Californians to reduce their commute times and distances. However, this link needs to be tested and quantified, as do the links between home affordability generally and gentrification.

2. Performance measures for the sustainable communities strategy should include the jobs-housing fit and 5 other housing-related measures.

3. MPOs' progress in meeting goals should be measured through

modeling and other sound scientific approaches.

4. The co-benefits of greenhouse gas reductions should be measured and reported.

We appreciate your consideration of our views.

Sincerely yours,

Christopher Mohr  
Executive Director  
Housing Leadership Council of San Mateo County

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-03 15:22:05

No Duplicates.

## **Comment 16 for Comments in general on ARB Implementation of SB 375 (sb375-general-ws) - 1st Workshop.**

First Name: Erin  
Last Name: Camarena  
Email Address: [ecamarena@lisc.org](mailto:ecamarena@lisc.org)  
Affiliation:

Subject: In Support of Housing Affordability in the Greenhouse Gas Equation  
Comment:

November 3, 2009

Mary Nichols  
Chair, Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chairwoman Nichols and members of the board:

We urge you to adopt the comprehensive recommendations from the Regional Targets Advisory Committee (RTAC) at your November 19, 2009, meeting. Crafted by a representative group of stakeholders and your able staff, the RTAC report carefully balances greenhouse gas reduction goals with social equity considerations of the impacts on lower-income Californians.

Bay Area Local Initiatives Support Corporation (LISC) is part of a national nonprofit and is one of twenty-nine field offices across the country. Bay Area LISC's work spans the nine-county Bay Area and extends as far north as Sacramento, with the majority focused in Alameda, Contra Costa, San Francisco, San Mateo, and Santa Clara Counties. Our goal is to help community-based organizations transform communities and neighborhoods into healthy ones: good places to live, do business, work and raise families. We believe in taking an equitable approach to community development. This means working to ensure that low-income communities throughout the Bay Area have improved access to affordable housing and jobs, and share the co-benefits of regional efforts to reduced greenhouse gas emissions.

Although supportive of the report as a whole, we urge your particular consideration of the following recommendations:

1. Metropolitan Planning Organizations (MPOs) should update their data collection and modeling to quantify the greenhouse gas reduction impacts of housing affordability, gentrification, and jobs-housing fit. As defined in the report, "jobs-housing fit" is the extent to which the rents and mortgages in a community are affordable to people who work there. In theory, a stronger jobs-housing fit should allow Californians to reduce their commute times and distances. However, this link needs to be tested and quantified, as do the links between home affordability generally

and gentrification.

2. Performance measures for the sustainable communities strategy should include the jobs-housing fit and 5 other housing-related measures.

3. MPOs' progress in meeting goals should be measured through modeling and other sound scientific approaches.

4. The co-benefits of greenhouse gas reductions should be measured and reported.

We appreciate your consideration of our views.

Sincerely,

Erin Camarena  
Assistant Program Officer: Green Connection  
Bay Area LISC

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-  
ws/20-bay\\_area\\_lisc\\_letter.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-<br/>ws/20-bay_area_lisc_letter.doc)

Original File Name: Bay Area LISC Letter.doc

Date and Time Comment Was Submitted: 2009-11-03 15:58:30

No Duplicates.

## **Comment 17 for Comments in general on ARB Implementation of SB 375 (sb375-general-ws) - 1st Workshop.**

First Name: Renner  
Last Name: Johnston  
Email Address: rennjill@sbcglobal.net  
Affiliation:

Subject: Adopt the recommendations from RTAC  
Comment:

November 4, 2009

Mary Nichols  
Chair, Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chairwoman Nichols and members of the board:

We urge you to adopt the comprehensive recommendations from the Regional Targets Advisory Committee (RTAC) at your November 19, 2009, meeting. Crafted by a representative group of stakeholders and your able staff, the RTAC report carefully balances greenhouse gas reduction goals with social equity considerations of the impacts on lower-income Californians.

I am an Urban Designer and Architect with Mogavero Notestine Associates in Sacramento. As a private practice, we believe that it is important to speak out about the critical importance of Land Use planning in the reduction of GHG.

Although supportive of the report as a whole, we urge your particular consideration of the following recommendations:

1. Metropolitan Planning Organizations (MPOs) should update their data collection and modeling to quantify the greenhouse gas reduction impacts of housing affordability, gentrification, and jobs-housing fit. As defined in the report, "jobs-housing fit" is the extent to which the rents and mortgages in a community are affordable to people who work there. In theory, a stronger jobs-housing fit should allow Californians to reduce their commute times and distances. However, this link needs to be tested and quantified, as do the links between home affordability generally and gentrification.
2. Automobile costs are very high when we make poor land use decisions. This high cost includes monthly payments to buy the vehicle, insurance, and fuel in addition to incredible unnecessary pollution. Mass transportation, the obvious solution, is not effective in sprawling landscapes of pavement.
3. Performance measures for the sustainable communities strategy should include the jobs-housing fit and other housing-related measures.
4. MPOs' progress in meeting goals should be measured through modeling and other sound scientific approaches.



5.The co-benefits of greenhouse gas reductions should be measured and reported.  
We appreciate your consideration of our views.

Sincerely,

Renner Johnston, AIA, LEED AP  
Senior Associate  
Mogavero Notestine Associates

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-04 10:10:45

No Duplicates.

**Comment 18 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Ezequiel

Last Name: Gutierrez

Email Address: egutierrez@publiclawcenter.org

Affiliation: PUBLIC LAW CENTER

Subject: Public Comments re RTAC Recommendations

Comment:

Please see attached letter from Public Law Center, Santa Ana, urging adoption of the comprehensive RTAC recommendations under review by the Air Resources Board. Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/25-affordable\\_housing\\_-\\_sb\\_375\\_-\\_plc\\_lt\\_arb\\_re\\_rtac\\_recommendations\\_-\\_scanned001.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/25-affordable_housing_-_sb_375_-_plc_lt_arb_re_rtac_recommendations_-_scanned001.pdf)

Original File Name: Affordable Housing - SB 375 - PLC LT ARB re RTAC Recommendations - Scanned001.pdf

Date and Time Comment Was Submitted: 2009-11-04 15:47:54

No Duplicates.

## **Comment 19 for Comments in general on ARB Implementation of SB 375 (sb375-general-ws) - 1st Workshop.**

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

Subject: ARB's Implementation SB 375  
Comment:

November 4, 2009

Mary Nichols  
Chair, Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

Dear Chairwoman Nichols and members of the board:

We urge you to adopt the comprehensive recommendations from the Regional Targets Advisory Committee (RTAC) at your November 19, 2009, meeting. Crafted by a representative group of stakeholders and your able staff, the RTAC report carefully balances greenhouse gas reduction goals with social equity considerations of the impacts on lower-income Californians.

The Kennedy Commission is a broad based coalition of community advocates focused on creating and increasing housing options available to Orange County's lowest income residents. More specifically, the mission of the Kennedy Commission is: to create the systemic change required to increase the production of housing for Orange County's extremely low-income households. The Commission's volunteers and staff strive to develop solutions to housing needs, to affirm the dignity of families of low and extremely low income and to unite communities across Orange County to support affordable housing development.

In Orange County, housing is unaffordable for most working families. The average median price for a home is \$499,999 and the Fair Market Rent for a two-bedroom apartment is \$1,546, making it one of the top ten least affordable rental markets in the nation (National Low Income Housing, 2009). Clearly homeownership and rentals are out of reach for lower income working families and they are greatly impacted by the lack of affordable housing opportunities. The lack of affordability of housing for working families in Orange County forces many to overcrowd or live in long distances from jobs in more affordable Counties. This in turn increases commuter traffic and congestion in our highways. For these reasons we believe that many of these issues need to be addressed in a comprehensive regional planning approach that addresses a better jobs-housing fit.

Although supportive of the report as a whole, we urge your particular consideration of the following recommendations:

1. Metropolitan Planning Organizations (MPOs) should update their data collection and modeling to quantify the greenhouse gas reduction impacts of housing affordability, gentrification, and jobs-housing fit. As defined in the report, "jobs-housing fit" is the extent to which the rents and mortgages in a community are affordable to people who work there. In theory, a stronger jobs-housing fit should allow Californians to reduce their commute times and distances. However, this link needs to be tested and quantified, as do the links between home affordability generally and gentrification.
  2. Performance measures for the sustainable communities strategy should include the jobs-housing fit and 5 other housing-related measures.
  3. MPOs' progress in meeting goals should be measured through modeling and other sound scientific approaches.
  4. The co-benefits of greenhouse gas reductions should be measured and reported.
- We appreciate your consideration of our views.

Sincerely,

Cesar Covarrubias  
Executive Director  
Kennedy Commission  
17701 Cowan Ave. #200  
Irvine, CA 92614  
Kennedycommission.org

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-  
ws/26-arbsb375.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-<br/>ws/26-arbsb375.pdf)

Original File Name: ARBsb375.pdf

Date and Time Comment Was Submitted: 2009-11-04 16:32:55

No Duplicates.

**Comment 20 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Walt

Last Name: Seifert

Email Address: saba@sacbike.org

Affiliation: Sacramento Area Bicycle Advocates

Subject: Comments on RTAC recommendations and implmentation of SB 375

Comment:

As with transit funding, there is a need for stable bicycle and pedestrian funding. While tranist funding is mentioned in the "RTAC Guiding Principles," bicycle/pedestrian funding is not. Generally at both the state and local levels, bicylce/pedestrian projects receive a smaller share of funding than other tranporation modess--smaller than warranted by the bicycle/pedestian mode share.

Unlike motorized transportation modes, bicycling and walking produce no greenhouse gas emissions. As ARB implements SB 375, we urge you to consider and address the need for substantial and stable bicycle/pedestrian funding.

Adoption of Complete Street principles to new road construction and to retrofit of existing roads would significant increase transit, bicycle and pedestrian use and decrease Vehicle Miles Travelled. We recommend specifically including adoption of Complete Streets policies as a Best Management Practice. Complete Street guidelines are currently being created by the Governor's Office of Planning and Research in response to the Complete Streets Act AB 1358 signed in 2008.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-06 14:10:37

No Duplicates.

**Comment 21 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Darryl

Last Name: Evans

Email Address: dgevens2001@yahoo.com

Affiliation: highway builder driver

Subject: truck emissions

Comment:

I understand all the global warming, but what i want to know is why is it being forced on us drivers, and why is HHO (circa 1884) not being considered????

Henry M. Paine's 1884 US Patent[8], which claims to "tweak" the oxyhydrogen gas produced by electrolysis so that it mimics the burn of fossil fuel, allowing it to be used in fossil fuel-fired appliances

it is the alternative fuel used after steam before gasoline, and when added to current systems emissions can be almost none.

This is not a new idea. The Jet Propulsion Laboratory at the California Institute of Technology published research on the uses of hydrogen as a combustion-enhancing agent in the early 1970s

So with the HHO on demand it is cost effective, and emission reducing.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/47-190px-electrolyser\\_1884.jpg](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/47-190px-electrolyser_1884.jpg)

Original File Name: 190px-Electrolyser\_1884.JPG

Date and Time Comment Was Submitted: 2009-12-10 00:52:57

No Duplicates.

## **Comment 22 for Comments in general on ARB Implementation of SB 375 (sb375-general-ws) - 1st Workshop.**

First Name: Stephen

Last Name: Sidoti

Email Address: stephen\_sidoti@yahoo.com

Affiliation:

Subject: You are destroying prosperity and you know it.

Comment:

You people take fake science, from a fake scientist, and create legislation from it. How can you sleep at night? How? And you know damn well what I'm talking about. You think you are going to clean up our air, but then you don't even realize that the air we breathe once was over the top of China, the most polluting nation on our planet. The reason why China is leading the world in manufacturing and production is because, if some one like you stood up and said "hey, you are hurting the environment!" They would be locked up and told to shut up. Because they don't care! They don't give a crap about global warming or diesel particulates. All that they care about is making money on a global scale. Literally trillions of dollars, most of it ours! You think that you are cleaning up California, but you're not. The air in which we breathe today will be blown over the top of Nevada and Arizona tomorrow. Have you ever heard of something called the Jet stream?? All that you care about is control. You want to control the people of California. You want us to eat from your hand. Freedom, is something to be frowned upon to you. You are completely ignorant in the fact that you don't even realize what you are doing to the well being of our state. You destroy jobs and loose more and more revenue by pushing business OUT of California. The only people coming into this state are illegal immigrants, who don't pay taxes, something you know and love. And you wonder why actual tax payers such as myself, are fleeing the state in search of one that doesn't crack down on prosperity. Remember from '08 to '09 there was a report that came out that said that California lost 144,000 tax payers? Do you? Why is that? What do you think? But yet, the population increased. So am I wrong? You need to seriously think about what you are doing to small businesses. Unemployment is at near record highs, yet you still want to keep pushing and pushing jobs out of our state. Mary Nichols count your blessings that your are appointed.....and not elected!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-02-02 22:53:02

No Duplicates.

**Comment 23 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Joe  
Last Name: Public  
Email Address: agggstt@yahoo.com  
Affiliation:

Subject: Mary Nichols needs to resign  
Comment:

I am a California Citizen which means I am the sovereign and this board and its members work for the people and the actions you are taking in the name of global climate change have been proven with factual evidence that it is all a scam to control the people.

I am mad as hell and I will not stop until your agenda is stopped or you will have to start locking up all the California population.

I am not alone, I know 20 other citizens that are tired of your lies and out of control agenda.

Mary Nichols needs to resign because she knew the fake PHD degree from one of your "researchers" and the report is full of information from other state studies and has nothing to do with California.

I am also writing the Governor and Attorney General to fire you and do an investigation and hopefully file charges against her.

You have already made businesses go under and put people out of work. I hope you are proud of the damage you have caused.

We are watching your actions from now on.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-02-04 19:32:31

No Duplicates.



**Comment 24 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Frank  
Last Name: Hamann  
Email Address: frank\_c\_hamann@juno.com  
Affiliation: Registered Electrical Engineer

Subject: CARB Stop Killing Jobs  
Comment:

Dear CARB,

I do not support your organization.

California's small businesses cannot afford the ridiculous rules emanating from the CARB. Many in CARB are promoting extreme global warming hysteria, making rules based on extremist predictions of climate change. The Global Warming Theory is now being exposed as a fraud. Even CARB has based many of their job killing regulations on bad science and even fraudulent reports such as the report created by Hien Tran. I suppose the motive of Mary Nickols and others promoting these job killing laws is pure political power. This abuse and tyranny must stop.

Sincerely,  
Frank Hamann  
Orange, CA  
frank\_c\_hamann@juno.com

PS: Attached is an article about the Global Warming Hoax from The New American Magazine

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/187-article\\_from\\_the\\_new\\_american\\_magazine.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/187-article_from_the_new_american_magazine.doc)

Original File Name: Article from The New American Magazine.doc

Date and Time Comment Was Submitted: 2010-02-14 17:03:15

No Duplicates.

**Comment 25 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Johnnie

Last Name: Beck

Email Address: johnnie@beckolivehill.com

Affiliation:

Subject: SB375

Comment:

I realize that California needs money, but this is not an honest way to get it.

I believe that it has been fairly well documented that global warming is a fraud.

It's obvious that unelected organizations like Green Peace have more influence in Sacramento than the citizens of this state.

The efforts of these organizations have prevented offshore drilling, nuclear power, numerous development and construction projects that could produced jobs and income for the state.

Our politicians that have spent us into bankruptcy need to drop the political correctness and patronizing of these unelected organizations that only retard the success of the is state, and under false pretense.

Please do not continue with this kind of legislation. Thank you ,  
Johnnie

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-02-27 14:38:39

No Duplicates.

**Comment 26 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Dorothy

Last Name: Dorothy

Email Address: dorothyblasy@comcast.net

Affiliation:

Subject: Cap & Tax

Comment:

What a farce. As if CA taxpayers don't have enough bogus laws to support.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-02-28 19:56:39

No Duplicates.

## **Comment 27 for Comments in general on ARB Implementation of SB 375 (sb375-general-ws) - 1st Workshop.**

First Name: Paul

Last Name: Campos

Email Address: pcampos@hbanc.org

Affiliation: Home Builders Assn. of N. Cal

Subject: CARB SB 375 GHG Workshop for the Bay Area

Comment:

Dear Sir or Madam,

These comments are submitted on behalf of the Home Builders Association of Northern California (HBANC). HBANC represents about 500 member companies and thousands of employees in the building and construction industries in the San Francisco Bay Area.

CARB jointly sponsored a Public Workshop (with MTC and ABAG) on March 10, 2010, on the process/methodology for establishing a GHG reduction target under SB 375 for the Bay Area. A CARB staff person gave the introductory remarks and stated that a principal purpose from CARB's perspective was to hear from the public on the state of the Bay Area economy and whether the weakness of the economy should be a consideration in the target setting process.

HBANC made oral remarks to the effect that the current economic climate (the Great Recession) must be part of the process by virtue of the requirement in SB 375 and federal transportation planning requirements that the SCS and the goals on which it is based must reflect realistic economic and social data and assumptions, and the projected land use pattern must reflect a realistic assessment of future development--which in turn is heavily influenced by the economy, job growth, market preferences, etc.

HBANC would like to supplement its oral testimony with this additional written information. The Bay Area, like the rest of California, is in a dire recession. And among Bay Area economic sectors, none is suffering more than the building industry.

The numbers tell the story. In 2007, the Bay Area's cities and counties issued 22,843 building permits--down 24% from an average of 29,978 issued from 1999 through 2006 (ABAG). These figures plummeted further still in 2008 and 2009. In 2008, permit issuance plunged to 12,583; and in 2009 to 5,642--the lowest on record.

This drop in building activity has significant repercussions on the entire Bay Area economy. According to research by SSRI, every dollar spent on new housing in California generates another \$0.8 in total economic activity, while each job created through residential construction supports an additional 1.2 jobs. According to a November 2009 article in the SF Chronicle, about 25% of the San Francisco region's 16,000 building trades workers had been out of work since March 2006, according to the San Francisco Building and Construction Trades Council.

This unprecedented weakness in the Bay Area building industry is reflected in the overall Bay Area economy. The following excerpt from a summary of the recently released Silicon Valley Index by Joint Venture: Silicon Valley of the state of the business climate in Silicon Valley--historically a pillar of Bay Area job growth and economic vitality--confirms this:

"SAN JOSE and MOUNTAIN VIEW, Calif. - February 11, 2010 - The economic recession has stalled Silicon Valley's vibrant innovation economy and left its global competitive standing at risk as never before, according to the 2010 Silicon Valley Index released today by Joint Venture: Silicon Valley Network and Silicon Valley Community Foundation.

The comprehensive yearly study on the economic strength and overall health of Silicon Valley reveals that rapid economic growth in other countries, coupled with California's legislative gridlock, is draining the lifeblood of funding and foreign talent from Silicon Valley, leaving recovery in a "new phase of uncertainty."

"Silicon Valley's innovation engine has driven the region's prosperity for 60 years, but at the moment we're stalled," said Russell Hancock, CEO of Joint Venture. "What's hard to say is whether we're stuck in neutral, which has happened before, or whether it's time now for a complete overhaul."

"This year's Special Analysis is a call to action for all of us," said Emmett D. Carson, Ph.D., CEO and president of Silicon Valley Community Foundation. "On the heels of the worst economic year since the Great Depression, our region has entered a new era of uncertainty in which our ability to attract top talent, fund innovation and preserve a decent quality of life is no longer guaranteed."

The 76-page 2010 Index reports the latest data and trends in economic development, workforce, housing, education, public health, land use, environment, governance, arts and culture and other sectors throughout Santa Clara and San Mateo Counties and portions of Alameda and Santa Cruz Counties. An accompanying Special Analysis section of the report each year takes a closer look at a particularly significant topic.

Highlights of the 2010 Index and Special Analysis include:

- \* Foreign Talent - With increasing global partnerships, Silicon Valley grows ever more dependent on foreign talent - particularly for filling science and engineering positions. However, the actions of our nation in the wake of 9/11 and the rise of other global regions have made Silicon Valley less accessible and less attractive than it once was. Inflows from China and India continue to rise, as does investment and collaboration between the Valley and those two nations, but China and India are both experiencing rapid economic growth. As they do, opportunities in those countries will slow the flow of talent here.

- \* Investment Capital - Silicon Valley's traditional ways of funding innovation - through locally-raised venture capital and public offerings - can no longer be taken as a given. Major structural shifts are underway in the funding community, and the federal government has re-emerged as the major investor in innovation and basic research. However, Silicon Valley is not

attracting significant shares of federal funding, and has not for some time.

\* Venture Capital - Investment is shifting away from software and semiconductors and into biotechnology, energy, medical devices, and media. The level of investment continues to decline, and venture capitalists generally have not realized significant returns for the past decade.

\* California Government - Silicon Valley is "slammed" by forces beyond its control, most notably the "malaise" in our state government. California's budget crisis and the political dysfunction in Sacramento has direct and debilitating effects on the region's ability to prepare the workforce, provide crucial infrastructure, maintain quality of life, and keep pace in the talent race with other regions.

\* Higher Education - U.S. and California investment in higher education is declining at a time when talent becomes still more important to Silicon Valley.

\* Jobs - Between November 2008 and November 2009, employment in Santa Clara and San Mateo Counties dropped 6.1 percent, compared to 3.8 percent nationally. Silicon Valley lost 90,000 jobs between the second quarter of 2008 and 2009, bringing total employment down to 2005 levels. The "green" economy accounted for 12,000 jobs in the region.

\* Housing - Residential foreclosure activity dropped by 39 percent in 2009 yet in some cities more than a third of sales are foreclosures. Housing affordability for first-time homebuyers is improving. New affordable housing units in the region doubled from 2008 to 2009. Average rents declined six percent from 2008, the first drop in rents since 2005.

\* Commercial Real Estate - Office vacancy rates are at an all-time high since 1998 and were up 33 percent in 2009 over 2008."

In sum, the Bay Area economy, like the rest of California, is in a Great Recession. This dire economic reality must be an important consideration as CARB assigns a GHG reduction targets to the Bay Area pursuant to SB 375.

Thank you for the opportunity to comment,

Sincerely,

Paul Campos  
Sr. V.P. & General Counsel

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-03-19 16:54:47

No Duplicates.



**Comment 28 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Richard

Last Name: Lyon

Email Address: rlyon@cbia.org

Affiliation:

Subject: Impacts of the recession on housing-related GhG emissions

Comment:

The California Building Industry Association strongly urges the California Air Resources Board and staff to correct the significantly overstated housing projections assumed in the AB 32 Scoping Plan and assumed to date in establishing state and regional targets for SB 375 Implementation. Overstated housing growth projections, if left uncorrected, will skew state and regional GhG emission reductions expected from land use and transportation. Revised housing (and related VMT) projections are needed now.

Please see the attached analysis.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/337-revised\\_cbia\\_report\\_0410.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/337-revised_cbia_report_0410.pdf)

Original File Name: Revised CBIA Report 0410.pdf

Date and Time Comment Was Submitted: 2010-05-11 09:39:11

No Duplicates.



**Comment 29 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Juan

Last Name: Matute

Email Address: jmatute@ucla.edu

Affiliation: UCLA School of Public Affairs

Subject: Measuring Progress Symposium - Recommendations for SB 375 Implementation  
Comment:

The attached document contains recommendations for SB 375 implementation based on the Measuring Progress Symposium discussion and background research. These immediate recommendations may be useful for discussion at the May 25 SB 375 Regional Targets Advisory Committee meeting and to the ARB as it finalizes targets and associated rulemaking.

The three recommendations contained in this brief are:

1. The ARB should transition from using the EMFAC emissions model to a modal emissions model such as U.S. EPA's MOVES2010
2. Consider effect of regional growth rate on ability to utilize land use strategies when establishing targets
3. Recognize SB 375's bias towards strategies with early maturities and communicate the value of land use strategies to MPOs

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/344-measuring\\_progress\\_white\\_paper\\_-\\_immediate\\_recommendations\\_-\\_print.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/344-measuring_progress_white_paper_-_immediate_recommendations_-_print.pdf)

Original File Name: Measuring Progress White Paper - Immediate Recommendations - Print.pdf

Date and Time Comment Was Submitted: 2010-05-20 11:38:47

No Duplicates.

**Comment 30 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Autumn

Last Name: Bernstein

Email Address: autumn@climateplan.org

Affiliation:

Subject: Comments on MPO submissions attached

Comment:

Please find the attached comment letter from ClimatePlan regarding the recent MPO submissions for the SB 375 target-setting process. We understand that this item will be on the June 24th CARB Board meeting agenda, however the agenda has not yet been posted and we were unable to submit the comments via the Board's website. If possible, please ensure these comments are included in the Board packet for that agenda item.

thank you,  
Autumn Bernstein

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/355-cp\\_comment\\_letter\\_to\\_carb\\_on\\_mpo\\_submissions\\_v3.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/355-cp_comment_letter_to_carb_on_mpo_submissions_v3.pdf)

Original File Name: CP comment letter to CARB on mpo submissions v3.pdf

Date and Time Comment Was Submitted: 2010-06-09 08:00:57

No Duplicates.

**Comment 31 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Dan  
Last Name: Gluesenkamp  
Email Address: gluesenkamp@egret.org  
Affiliation:

Subject: Please 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,

Dan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-06-21 10:07:59

1 Duplicates.

**Comment 32 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Gary  
Last Name: Levitt  
Email Address: garylevitt@urbanvillagesm.com  
Affiliation: Property Owner

Subject: SB- 375  
Comment:

See attached letter

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/359-uvsm\\_-\\_state\\_letter\\_\\_on\\_sb\\_375.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/359-uvsm_-_state_letter__on_sb_375.pdf)

Original File Name: UVSM - State letter on SB 375.pdf

Date and Time Comment Was Submitted: 2010-06-21 15:35:13

No Duplicates.

## **Comment 33 for Comments in general on ARB Implementation of SB 375 (sb375-general-ws) - 1st Workshop.**

First Name: Clare  
Last Name: Brady  
Email Address: opggalon3@mchsi.com  
Affiliation: American citizen

Subject: Middletown air pollution  
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. &#12288;

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. &#12288;

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.&#12288;

Please continue to support public health by establishing strong regional greenhouse gas targets. Middletown 95461 is often plagued by woodsmoke and vehicle emission pollution.

Sincerely,  
Clare Brady

-----  
--

American Lung Association  
1301 Pennsylvania Ave. NW, Washington, DC 20004  
T: 202 785 3355 | F: 202 452 1805 | E: webmaster@lungusa.org  
American Lung Association (c) 2009  
Update Your Profile • Unsubscribe

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-06-22 16:38:29

No Duplicates.

**Comment 34 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Michael

Last Name: Chiacos

Email Address: mchiacos@cecmail.org

Affiliation: Community Environmental Council

Subject: Comments on SBCAG SB 375 analysis

Comment:

The attached letter highlights the concerns that many Santa Barbara community organizations have regarding SBCAG's analysis and process. We hope that these concerns can be taken into consideration when developing Santa Barbara County's GHG reduction target.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/361-sb\\_375\\_comments\\_to\\_arb\\_and\\_sbcag.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/361-sb_375_comments_to_arb_and_sbcag.pdf)

Original File Name: SB 375 comments to ARB and SBCAG.pdf

Date and Time Comment Was Submitted: 2010-06-23 16:43:08

No Duplicates.

## **Comment 35 for Comments in general on ARB Implementation of SB 375 (sb375-general-ws) - 1st Workshop.**

First Name: Jerry

Last Name: Walters

Email Address: j.walters@fehrrandpeers.com

Affiliation: Fehr & Peers

Subject: MPO Forecasts of Ambitious, Achievable GHG Reductions

Comment:

I commend the MPOs for their considerable efforts in assessing their GHG reduction potential. In many cases, the MPOs drew upon many months of public outreach and stakeholder discussions, scenario testing and modeling and "bottom up process" within the regions to assess their GHG reduction potential. The material they presented at the May 25 RTAC meeting represents an impressive set of individual and collaborative efforts to identify "ambitious and achievable" land use and transportation strategies in response to SB375.

I also understand that many of the MPOs are planning to further refine and evaluate the planning scenarios over the coming months. My comments below are offered in the spirit of helping the MPOs to fine tune and amplify strategy proposals, and to improve their confidence in and accountability for the resulting GHG estimates. They are also intended to help ARB bring consistency and equity to its interpretation of the findings and to assess whether the MPO scenarios and estimates have gone far enough in reducing travel and GHG.

### **1. Ambitiousness of Land Use Scenarios**

The four major MPOs envision a shift in the real estate market with the recovering economy toward significantly reduced emphasis on large-lot single family development. All project that 60% to 80% of their regions' growth between 2020 and 2035 will be in the form of attached units or small lot single-family. Under their most ambitious smart growth planning strategies, SCAG and SANDAG and MTC all project that at least 85% of their growth could be focused on attached and small-lot housing. MTC, SANDAG and SACOG anticipate locating most of their regions' growth in transit priority areas, while SCAG projects only about half of its growth will occur in designated transit areas. My question is whether these ambitious assumptions are not, in fact, closer to what we can realistically anticipate than are the "achievable" scenarios. Testimony last year to the RTAC by representatives of the development community, and recent reports on real estate development trends and forecasts by Price Waterhouse and others, suggest that the most ambitious land use forecasts presented by the MPOs may actually be more in line with the real estate market than the achievable forecasts. Information provided by SCAG demonstrates the important difference between what experience tells and what is, in fact, foreseeable. SCAG's table summarizing the planning intentions of its sub-regions indicates that they are intending or exploring potential mixed-use, transit oriented,



infill and compact development at levels that are double or triple the levels they identify as "fully adopted". In contrast, information presented by Kern COG seems to suggest that the land use vision of local planners is limited to the development proposals they've been presented in the past rather than a projection of the locations and forms of development that the real estate market has the potential to deliver in the future.

## 2. Ambitiousness of Roadway Pricing Assumptions

Based on forecasts from ARB, the regions assume an increase in vehicle maintenance and fuel prices, with real automobile operating costs per mile in 2035 about 45% greater than 2005, expressed in constant dollars. While this may seem like a significant increase and a deterrent to automobile travel, it is important to note that 2005 California gasoline prices were about \$2.50 per gallon. Price increases that have already occurred since 2005 represent about half of the 2005-to-2035 growth projected by ARB. Relative to today's fuel prices, the 2035 projections translates to an increase of less than 1% per year. Even when combined with the MPOs roadway pricing assumptions, the low growth in auto operating costs results in a continued erosion in roadway user costs per mile traveled, a phenomenon that has produced profound loss in real transportation funding over the past 40 years.

## 3. Mutual-Supportiveness in Strategy Sets

SCAG, SANDAG and SACOG also anticipate significant increases in transit service per capita by 2035. However, among the three largest MPOs, it is MTC that projects the greatest increase in per capita transit ridership. This appears to support the notion that, for regions with well-established transit networks, a combination high levels of roadway pricing and strong orientation of land use growth toward transit opportunity areas produces the greatest gains in transit use. It's not apparent that the other regions have yet found the "sweet spot" of combined land use, roadway pricing and transit investment.

## 4. Worsening Jobs/Housing Balances

In several regions, including MTC and SACOG, the regional balance of jobs and housing is projected to become worse in the future in spite of the SB 375 requirement that regions achieve a feasible balance. SCAG might also consider whether its "achievable" blueprint scenario fully reflects the region's best efforts to balance jobs and housing within its individual sub-regions.

## 5. Differences in the Baseline GHG and Strategy Effectiveness

The results presented to the RTAC contained an apparent inconsistency in San Diego's ability to achieve significantly greater benefits from travel demand management (TDM) strategies than the other major regions, even though its list of strategies appears less ambitious. This finding accompanies information submitted by SANDAG indicating that its baseline 2005 GHG per capita was about 20% higher than the levels reported by the other major MPOs. ARB should have a method of assessing and resolving apparent inconsistencies in the MPOs' reported assumptions and findings.

## 6. Counter-Intuitive Findings and Need for VMT Information

Counter-intuitive findings exhibited in the findings presented to the RTAC also include the fact that the achievable 2020 reduction percentages for the three largest MPOs were actually higher than projected reductions in 2035. Several possible explanations were mentioned, such as pre-2020 implementation of roadway pricing and vehicle fuel economy and low-carbon fuel standards, but several RTAC members believed that more information was needed in order to judge the credibility of these assumptions and results. They recommended that ARB obtain more complete information, including forecasts of vehicle miles traveled (VMT), from the MPOs before concluding that the performance dip should be adopted into targets.

The reported GHG reductions blend the effects of reduced VMT with the assumed effects of improved vehicle fleet efficiency and the carbon content of fuels. SB375 places specific emphasis on the degree to which coordinated regional land use and transportation strategies reduce VMT as a distinct component of GHG reduction. Even though GHG may be deemed the primary measure of performance under SB375, it seems essential that ARB also be provided each MPO's VMT statistics in order to address apparent anomalies in the other data submitted by some of the MPOs.

## 7. Consistency and Equity in Rules and Assumptions

Information submitted by the MPOs also raises questions on the consistency of key assumptions from region to region. For example, Fresno, Kern and SJCOG appear to be using different population growth rate assumptions than one another and than provided by the Department of Finance. The Central Valley MPO's have also raised important questions concerning the assumptions and forecasting methods that should be used to project interregional travel. Kern and Santa Barbara have also raised concerns about the reasonableness of holding MPOs accountable for the GHG generated by travel from state and federal institutions over which they have no control, such as prisons, military bases and universities.

## 8. Reasonableness Checks

Before beginning to compare the MPO forecasts to one another and draw conclusions related to targets, ARB should perform several technical reasonableness checks on the modeling data submitted. This need not be a complex modeling process, but can be accomplished using information on typical effectiveness of land use and TDM strategies that the University of California has been preparing for ARB.

MPOs such as Fresno, Kern and San Luis Obispo submitted evidence that they had improved their models with 4D sensitivities and based their target-setting submissions on results from the more sensitive models. Other MPOs such as SCAG, SANDAG and MTC have not been as clear on the degrees to which their models are sensitive to key land use, demand management and transportation system strategies. All three have mentioned longer range efforts to improve their models to "activity based" frameworks, and SCAG and SANDAG have also mentioned more immediate improvements to include 4D and other enhancements to their trip-based models and to independent visioning and sustainability tools. However, none have reported whether the models used in scenario analyses submitted to ARB were based on improved models. This raises important questions about the consistency of reporting among MPOs and about whether the target proposals submitted by some MPOs realistically portray the VMT and GHG reductions that are achievable under their tested scenarios. ARB should request information from all of the MPOs who

have submitted target proposals on the quality of modeling used in their respective estimations. Key criteria upon which the consistency and performance of the models should be judged include their quantitative sensitivities to:

- The effects of land use compactness, centrality, mix and transit orientation on auto ownership, mode choice, vehicle trips generation and VMT and travel speed profiles.
- The effects of different travel demand management (TDM) strategies individually and in combination and as they vary with urban form and context
- The effects of roadway and parking pricing, including VMT pricing, both at low levels and at levels above or beyond magnitudes previously experienced
- The effects of transit service improvements such as service coverage, frequency, on-time performance, and fares on automobile mode shares and VMT

The University of California information provides empirical evidence on expected ranges of these effects that can be used to judge the performance of the models in providing reliable reports on the effectiveness of strategies contained within the submitted MPO planning strategies.

#### 9. Other Benefits of Reliable Forecasting

Insuring the accuracy and consistency within these forecasts is important not only to assuring fairness among the MPOs and accuracy in overall target setting, but it is also in promoting effective policy planning within the regions. Elected officials in all regions will be able to make more effective decisions on transportation policy and planning guidelines if provided accurate information on the potential consequences of their options. Forecasting should be able to inform decision makers, for example, of the costs, impacts, benefits and co-benefits of their policy and planning strategies.

Jerry Walters, Principal  
Fehr & Peers  
One Walnut Creek Plaza  
Walnut Creek, CA 94596  
925-930-7100  
j.walters@fehrrandpeers.com

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-06-23 23:34:51

No Duplicates.

**Comment 36 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Anamarie

Last Name: Lamme

Email Address: ALamme@herocare.org

Affiliation:

Subject: Connect Transportation: Temecula /Escondido/Downtown

Comment:

There is currently an MTS Express that runs from Escondido to Downtown. Since so many people commute from Temecula/Murrieta, why not consider an express that begins in Temecula, stops for a pickup at the Park and Ride at the I-15 and the 76 intersection (for Fallbrook residents) and then picks up again in Escondido (Currently bus 810) and then proceeds to Downtown. Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-06-30 10:51:02

No Duplicates.

**Comment 37 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Bryan

Last Name: Todd

Email Address: xander61@hotmail.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,

California resident

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-07 19:21:43

No Duplicates.

**Comment 38 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: David

Last Name: Schonbrunn

Email Address: David@Schonbrunn.org

Affiliation: TRANSDEF

Subject: Comments from Transportation Solutions Defense and Education Fund (TRANSDEF)

Comment:

Please see attached comment letter regarding MTC's regional target.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/377-arb\\_target\\_setting.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/377-arb_target_setting.pdf)

Original File Name: ARB target setting.pdf

Date and Time Comment Was Submitted: 2010-07-12 07:38:23

No Duplicates.

**Comment 39 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Richard

Last Name: Lyon

Email Address: rlyon@cbia.org

Affiliation:

Subject: Business coalition comments on draft 375 targets

Comment:

Thank you for accepting these comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/379-business\\_coalition\\_letter\\_on\\_draft\\_375\\_targets.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/379-business_coalition_letter_on_draft_375_targets.pdf)

Original File Name: Business coalition letter on draft 375 targets.pdf

Date and Time Comment Was Submitted: 2010-07-13 17:42:19

No Duplicates.

**Comment 40 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Jon  
Last Name: Harrison  
Email Address: lkimura@arb.ca.gov  
Affiliation:

Subject: Comment for SB 375  
Comment:

Jul 16, 2010

Chairman Nichols  
1001 I Street  
Sacramento, CA 95812

Dear Nichols,

As a Councilmember in Redlands, California, I encourage the  
California

Air Resources Board to pursue vigorous implementation of SB 375  
(Steinberg). This law will help California lead the way in the  
implementation of "smart growth" economic development

policies that promote healthier communities and reduce harmful  
air

pollutants and greenhouse gases. As I stated in testimony before  
your

Commission during the Scoping Plan discussions changes to land use  
and

transportation policy are important to reducing emissions, and SB  
375

does this by encouraging improved land use and transportation  
planning

and alternatives to driving, including:

\*neighborhood reinvestment and redevelopment



\*more robust and effective transit programs

\*more walkable, compact communities connected by transit

\*community design and infrastructure that supports walking and biking

We know these programs will lead to a smart economic development policy

at the same time that they generate excellent health benefits and address global warming with more jobs, cleaner air, and less time in

traffic. These should be priority goals in California.

Sincerely,

Mr. Jon Harrison

Redlands, CA 92373

(909) 809-9934

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-19 07:55:30

No Duplicates.

**Comment 41 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Maryanne  
Last Name: Solomon  
Email Address: lkimura@arb.ca.gov  
Affiliation:

Subject: Comment for SB 375  
Comment:

Jul 9, 2010

Chairman Nichols

CA

Dear Nichols,

I encourage the California Air Resources Board to pursue vigorous implementation of SB 375 (Steinberg). This legislation will help California lead the way in the implementation of "smart growth" economic development policies that promote healthier communities and reduce harmful air pollutants and greenhouse gases. SB 375 does this by encouraging improved land use and transportation planning and alternatives to driving, including:

- \*neighborhood reinvestment and redevelopment
- \*more robust and effective transit programs
- \*more walkable, compact communities connected by transit
- \*community design and infrastructure that supports walking and biking

We know these programs will lead to a smart economic development policy

at the same time that they generate excellent health benefits and address global warming with more jobs, cleaner air, and less time in traffic. These should be priority goals in California.

Sincerely,

Ms. Maryanne Solomon  
1217 23rd St  
Santa Monica, CA 90404-1344  
(310) 829-7218

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-19 07:56:57

No Duplicates.

**Comment 42 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: charles

Last Name: paulden

Email Address: pleasure\_point\_1@yahoo.com

Affiliation:

Subject: garden cities

Comment:

It would be great if they would plan and not just hot ugly urban cages.

Parkways, living walls and roofs, access to urban farms and water ways with porous pathways and bike-paths...

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-21 20:05:53

No Duplicates.

**Comment 43 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Grace

Last Name: Marvin

Email Address: g-marvin@comcast.net

Affiliation: Sierra Club - Yahi Group

Subject: SB 375

Comment:

Please know that our club believes it is highly important to get SB 375 implemented well and as soon as possible. We cannot afford to delay it!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-22 17:49:03

No Duplicates.

**Comment 44 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Michael

Last Name: Bullock

Email Address: mike\_bullock@earthlink.net

Affiliation:

Subject: How To ImplementThe Strategy Of Unbundling The Cost Of Parking

Comment:

The report is explained in my report to CARB on targets. As stated there, it was presented June 22, 2010 at the 103rd Air and Waste Management Association's Convention in their Sustainable Land Use and Transportation Session.

Please call me so we can set up a time for me to come to CARB and present this concept, including how it could be implemented statewide.

Mike Bullock  
760-754-8025

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/394-manuscript18c.pdf>

Original File Name: Manuscript18c.pdf

Date and Time Comment Was Submitted: 2010-07-23 17:05:25

No Duplicates.

**Comment 45 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Christopher  
Last Name: Mateo  
Email Address: chrismateo08@comcast.net  
Affiliation: Lathrop, CA

Subject: Help Local Governments Improve Air Quality and Public Health  
Comment:

Dear Chairman Nichols,

I encourage the California Air Resources Board to pursue vigorous implementation of SB 375 (Steinberg). This law will help California lead the way in the implementation of "smart growth" economic development policies that promote healthier communities and reduce harmful air pollutants and greenhouse gases. SB 375 does this by encouraging improved land use and transportation planning and alternatives to driving, including:

\*neighborhood reinvestment and redevelopment \*more robust and effective transit programs \*more walkable, compact communities connected by transit \*community design and infrastructure that supports walking and biking

We know these programs will lead to a smart economic development policy at the same time that they generate excellent health benefits and address global warming with more jobs, cleaner air, and less time in traffic. These should be priority goals in California.

Sincerely,

Mr. Christopher Mateo  
Lathrop, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-26 11:31:15

No Duplicates.

## **Comment 46 for Comments in general on ARB Implementation of SB 375 (sb375-general-ws) - 1st Workshop.**

First Name: Veronica

Last Name: Jacobi

Email Address: VJacobi@sonic.net

Affiliation: Santa Rosa Councilmember

Subject: Regional MTOs should set the bar higher for our future!

Comment:

I and my family, and many other citizens of Santa Rosa appreciate the goals that the MPOs have proposed to reverse VMT increases... More is needed!

VMT reductions will produce many benefits:

- Reduce traffic congestion
- Reduce air pollution and greenhouse gas emissions
- Reduce expenditures for gasoline and other fuel sources
- Provide job opportunities, shopping and other amenities closer to residences
- Improve access to transit
- Promote communities to be more walkable and bikable which will also improve peoples health and quality of life
- Reduce our dependence on foreign oil.

However, the VMT reductions per capita that the MPOs have proposed are too limited to accomplish all these benefits, because they are overwhelmed by the projected population increases. In other words, the net result from even the proposed 10% VMT reduction per capita would still mean an 8% increase in VMT by 2020, while 5% VMT target would mean a 14% increase in VMT compared to 2005. By 2035, a 12% VMT reduction per capita would mean total VMT would be 28% higher than in 2005 (using the official California Dept of Finance population projections ).

To accomplish the needed reductions requires stopping sprawl and shifting to in-fill development, which, in turn, needs to be supported by ending highway expansion. In addition, transportation planning must involve aggressive transportation demand management that will support the increased use of transit, car-pooling, bicycling and walking, in ways such as the following:

1. Improving transit service and lowering fares.
2. Increasing the cost of driving per mile to cover all costs.
3. Appropriately pricing parking (possibly through unbundling parking costs and distributing parking revenue to those who use transit, carpools and other means to avoid use of parking).

We note that the latter two are much less costly than the first. In fact the second one could generate revenue to support improved transit service. Our current pricing system is fundamentally unfair because it effectively causes those that drive less to subsidize those that drive more. We believe that the combination of land use change and ending highway expansion plus the three above transportation management strategies can put California on track to achieve a 2035 target of no net total increase in VMT.



Although the MPO draft targets are challenging because they represent a reversal of the historic trend in constantly increasing VMT per capita. We need measures to expand local jobs opportunities, make transit options more accessible, reduce air pollution and generally improve the quality of life in all our communities.

I believe it was Portland, or maybe Denver that compared the cost of 1/2 mile of freeway widening to the cost of a vast network of bike lanes/paths and pedestrian improvements! I could do some research on references for this if that would be helpful.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-07-29 18:46:21

No Duplicates.

**Comment 47 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: George

Last Name: Hague

Email Address: gbhague@gmail.com

Affiliation: Voter

Subject: Vehicle Miles Traveled(VMT)

Comment:

I live in western Riverside County which has some of the worst air quality in the nation. Riverside County Supervisors just approved the Villages of Lakeview Housing project this past March. It will have more than 11,000 units with almost no permanent jobs. It is in the middle of farm land and adjacent to San Jacinto Wildlife Area which is a core reserve of the Multi-Species Habitat Conservation Plan. The EIR for the project stated that at least 15,000 Daily Commuters will be produced by this single leapfrog project. SCAG needs to reduce VMT significantly and not just rely on increasing gas mileage of cars/light trucks to reduce GHG emissios. Counties should not be in the business creating new cities in the middle of farmland as they did in Riverside with the Villages of Lakeview. Creating infill, building adjacent to existing cities and protecting Agriculture should be a priority in your final product.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-06 22:26:37

No Duplicates.

**Comment 48 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Edward

Last Name: Mainland

Email Address: emainland@comcast.net

Affiliation:

Subject: More Support for Carbon-Reducing Transportation

Comment:

Expanding more highways just makes air pollution worse and state carbon reduction targets harder to meet. All new state infrastructure projects should be held to a "reduce net carbon emissions" rule. All projects should be subject to a "carbon impact assessment" to measure their carbon impact. More priority support for mass transit, bicycling, pedestrian walkways, smart growth, transit-friendly development, "complete streets" should aim at transforming our communities to lower VMT and make them more habitable and enjoyable. State agencies, notably CARB, should set higher goals for electrification of transportation. That means much higher priority to electric vehicles (EVs), plug-in electric vehicles (PHEVs) and supporting infrastructure. EVs can be brought to market and are being scaled up much faster and more cheaply than hydrogen fuel cells and most biofuels with less environmental impact both in the short and longer terms. CARB's seeming infatuation with H2 vehicles -- perhaps forced on CARB by important politicians -- makes no sense. H2 light-duty vehicles are a generation away from being market-ready and affordable. Putting investment into costly H2 infrastructure now, before the vehicles are a proven and workable commodity, is premature to say the least.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-08 15:17:59

No Duplicates.

**Comment 49 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Robert

Last Name: Ball

Email Address: rball@kerncog.org

Affiliation: Kern COG

Subject: Kern COG Response to 8-9-10 ARB Staff Report on Targets

Comment:

Attached are written comments being provided 10-days to the ARB meeting on September 23, 2010. The attached comment was approved by the Kern COG Transportation Technical Advisory Committee on September 1, 2010, and a final Kern COG Board action is scheduled for September 16, 2010. Kern COG will provide ARB with any changes resulting from Kern COG Board Action on September 17, 2010. Kern COG and the County of Kern plan on providing an oral comment at the September 23, 2010 ARB meeting. Note that Kern COG and the County of Kern are attempting to coordinate with SJVAPCD and the 7 other MPOs on an alternative target proposal for the 8-MPO region.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/559-kern\\_cog\\_comment\\_on\\_sb\\_375\\_target\\_setting\\_-\\_090110.docx](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/559-kern_cog_comment_on_sb_375_target_setting_-_090110.docx)

Original File Name: Kern COG Comment on SB 375 Target Setting - 090110.docx

Date and Time Comment Was Submitted: 2010-09-13 16:51:26

No Duplicates.

**Comment 50 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Dave  
Last Name: Connell  
Email Address: davconn@cox.net  
Affiliation: American Legion

Subject: SB 375 killing California  
Comment:

We all want clean air but we must all have jobs and easy economical transportation in cars. CARB is already creating huge hardships on the people and businesses in California, far in excess of what is needed or reasonable. SB 375 is a burden that excessive air quality regulations place on the average citizen, especially at a time when people are struggling to put food on their table or find employment. We need to focus on being able to provide for ourselves and our families.

We need to government to help us, NOT create additional costs and burdens no matter how important over zealous environmental extremists think it is. We need Common Sense in government not more business and life stifling regulations and controls. I have lived in Southern California for over 80 years except for four years in the Navy and despite all the SMOG and other stuff, I and all my friends have survived quite well. Yes, we like clean air but there is NO need for even more regulations and unattainable pure air, especially at the cost of further destroying the long envied California life style.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-09-21 17:29:40

No Duplicates.

**Comment 51 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Justin

Last Name: Massey

Email Address: justin.massey@gmail.com

Affiliation:

Subject: SB 375 Targets

Comment:

Dear Chairwoman Nichols and Board members:

I support strict, enforceable measures to meet greenhouse gas emissions targets under SB 375. Greenhouse gas emissions should not be left to the "flexibility" of local MPO's, but should be uniform to ensure that all local governments operate under a uniform standard to timely achieve the goal of reducing greenhouse gas emissions and creating liveable communities. Sprawl has failed. It is time for us to be responsible and innovative at the same time. I urge the ARB to set the measures needed to accomplish this goal.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-09-22 12:09:02

No Duplicates.

**Comment 52 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Woody

Last Name: Hastings

Email Address: whastings@cleanairnow.us

Affiliation: Clean Air Now

Subject: SB 375 Target Setting (Agenda Item 10-8-2, 9-23-10)

Comment:

See Attachment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/636-can\\_comments\\_-\\_sb375.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/636-can_comments_-_sb375.pdf)

Original File Name: CAN Comments - SB375.pdf

Date and Time Comment Was Submitted: 2010-09-22 17:52:51

No Duplicates.

**Comment 53 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Pamela

Last Name: Epstein

Email Address: pepstein@sierraclubsandiego.org

Affiliation: Sierra Club San Diego

Subject: Greenhouse Gas Targets per SB 375

Comment:

see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/728-carb\\_ghg\\_letter\\_9.29.docx](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/728-carb_ghg_letter_9.29.docx)

Original File Name: CARB ghg letter 9.29.docx

Date and Time Comment Was Submitted: 2010-09-29 23:47:27

No Duplicates.



**Comment 54 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: john

Last Name: davis

Email Address: john@advantageasphalt.com

Affiliation:

Subject: general comments

Comment:

I am a life long california resident. although not much longer. I am descusted at all or u poeple in arb and carb. It has been proven time and time again that man made climate change is bogus. their is no real evidence that so called green house gases affect anything. climate change is natural. mother earth has been doing it for countless mellenia. Its also been proven that one volcano emits more pollutants in one blast than we will ever produce, yet again mother earth finds a way to clean it up. why do u guys insist on destroying our country and economy. None of your regs really do anything to fix air polution. only mother earth can do that. Please stop all these bs regulations that only serve your payrolls. PS, all those dpf units have to be cleaned out. what happens to that toxic waste. Just like the paper bag drives when i was a kid. The recycling was 10 times more toxic than the original bag. Please stop all this insanity and find a way to make a real diff, not one thats just political correctness..

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-01-24 07:04:54

No Duplicates.

**Comment 55 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Ron

Last Name: Kilmartin

Email Address: ronkilmartin@comcast.net

Affiliation: Consulting Engineer

Subject: Place AB 375 and AB 32 on hold until unemployment drops to 6%

Comment:

Since the anthropogenic global warming theory is fraudulent, activities under these laws are make-work projects for state employees and others and will have no effect on either global CO2 concentration or global mean temperature, but a huge effect on the state's economy and the taxpayer's ability to pay these employees their humongous salaries and golden pensions.

We should economize at the state and local levels and since there is no demonstrable need for either AB 375 or AB 32, they should be set aside until the state's taxpayers can afford to dump money on time-wasting money-wasting make-work projects.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-01-25 21:28:05

No Duplicates.

**Comment 56 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Susan

Last Name: Rocha

Email Address: car2532002@yahoo.com

Affiliation: none

Subject: SB375

Comment:

I think this law maybe a bad idea. Trucks will stop making deliveries to California. And, it is over regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-02-02 06:59:13

No Duplicates.

**Comment 57 for Comments in general on ARB Implementation of SB 375  
(sb375-general-ws) - 1st Workshop.**

First Name: Gail

Last Name: Sevens

Email Address: gsevr@parks.ca.gov

Affiliation: California State Parks

Subject: Request Revision to CAR Forest Project Protocol 3.2 Re: Definition of Project Area  
Boundar

Comment:

The California Department of Parks and Recreation (California State Parks) requests changes to the FPP 3.2 language in order to allow a Forest Owner to finalize the geographic boundaries of the Project Area at the second site verification. This would apply to Reforestation Projects that have elected to defer initial inventory until the second site verification (FPP 3.2, Section 6.1.1). The Forest Owner would be required to submit a "draft" set of geographic boundaries for the Project Area that met all eligibility requirements at the initial project verification. However, these Project Area boundaries could be revised and finalized at the second site verification as long as the finalized boundaries are the same, or a subset of, the original "draft" boundaries submitted and verified for eligibility at the initial verification. The reason for this proposed revision is the need for flexibility to define acres to be planted over first 10-12 years of the project that will ensure maximum success and survivability of the reforestation, protect resources, and avoid unneeded costs.

See Attached Letter for further Explanation of Request for  
Revision

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/1320-proposed\\_revision\\_to\\_fpp3\\_2\\_to\\_carb\\_2011-02-16.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sb375-general-ws/1320-proposed_revision_to_fpp3_2_to_carb_2011-02-16.pdf)

Original File Name: Proposed Revision to FPP3 2 to CARB 2011-02-16.pdf

Date and Time Comment Was Submitted: 2011-02-18 12:39:47

No Duplicates.

**There are no comments posted to Comments in general on ARB  
Implementation of SB 375 (sb375-general-ws) that were presented during the  
Workshop at this time.**