

## **Comment 1 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Bob

Last Name: Johnston

Email Address: [rajohnston@ucdavis.edu](mailto:rajohnston@ucdavis.edu)

Affiliation: UC Davis

Subject: Land Use Policies

Comment:

Your treatment of local land use policies in the Recommended Measures (pp. 31-33) is weak. Policies such as urban growth boundaries (sliding, not fixed), strong infill/redevelopment/intensification, and selective densification near rail stations and bus rapid transit lines are usually beneficial economically, especially to lower-income households. The CEC report of last year and the LUSCAT Subcommittee report did not cite most of this large literature that evaluates land use measures and associated transportation policies and investments. Upcoming studies by EDF and UC should help with this research gap, both in terms of modeling studies and also empirical research. I hope that stronger policies can be included in the Final Scoping Plan.

Also, it is important to observe that investments in transit generally cannot be effective unless backed up with land use intensification and mix, sidewalks, and bike lanes. Also, transit needs pricing corrections to be made for auto travel, such as parking charges for worktrips and higher fuel taxes. Parking charges, for example, are not a new cost, merely the unbundling of an existing cost that is hidden in (lower) salaries. Work by Shoup at UCLA and others clearly show parking charges to be effective in reducing SOV commuting and to be economically efficient.

I know the ARB staff is more comfortable with technology regulation, but it will not be possible to meet the 2050 standard without substantial change in land use policies and in transportation pricing and investments. Pricing corrections take effect immediately and often are easy to implement.

Perhaps the Final Scoping Plan can state that the ARB recommends that Federal and State transportation funding, after 2012, be conditioned on cities and counties adopting general (land use) plans and regional transportation plans that show GHG reductions compatible with the Statewide 2020 standard and generally on track to meet the 2050 standard, too. Co-benefits of compact growth would include reduced conversion of ag lands, reduced destruction of habitat lands, and lower wildfire costs for property losses.

I fear that the current Draft Scoping Plan does not treat this issue with enough seriousness to get the attention of cities and counties. Without stronger policies, we will lose valuable time while they, and their representatives equivocate.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-06-27 19:52:35

No Duplicates.

## **Comment 2 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Frances

Last Name: Mathews

Email Address: mathewsfran@sbcglobal.net

Affiliation: League of Women Voters

Subject: Proximity to Jobs and Transportation

Comment:

We can't go on building more and more distant suburbs. Not only does this force people to drive further to work and prevent much use of public transportation, but it also harms our water supply, recreation, and animal habitats. Building distant suburbs necessitates miles of roads and huge parking lots, in addition to the space occupied by the homes themselves. Covering up land with concrete prevents rainwater from percolating down to replenish ground water. Instead it runs off picking up worn rubber, oil, pet feces, etc. Thus the rainwater, which we desperately need, becomes "run-off", a disposal problem.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 10:53:38

No Duplicates.

## **Comment 3 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Lynn

Last Name: Sadler

Email Address: [lynnsadler@mountainlion.org](mailto:lynnsadler@mountainlion.org)

Affiliation: Mountain Lion Foundation

Subject: AB 32 Land use component

Comment:

The Mountain Lion Foundation urges you to mandate much tighter limits on sprawl which creates the necessity for longer commutes. Even though we all continue to push mass transit, the fact is even those buses and trains contribute carbon as well -- both in their manufacture and in their operations.

We need to be mandating communities that promote affordable housing where people actually work. We need to locate schools, grocery stores and other amenities within walking distance of homes. We need to create walking and bicycle friendly communities. We need communities near farmland and open space so that food need not travel so far.

From our point of view, land use planning is probably the single most important aspect of reducing carbon load, and your plan should reflect that.

Please re-think and re-write this section of your plan to implement AB 32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 11:44:02

No Duplicates.

## **Comment 4 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Sally

Last Name: Thomas

Email Address: [weavertoo@gmail.com](mailto:weavertoo@gmail.com)

Affiliation:

Subject: Land us and Local Government Sector

Comment:

Please stand up for the good for local communities! I would even appreciate being able to pay a bit more in taxes in exchange for having the State step in to CONSTRAIN LOCAL LAND USE authority and make developers accountable for sane transportation, air quality, water quality, sewer and waste treatment and all the other true costs of development that the big financial machines are passing on to communities that have no way of getting redress for the damages being caused by unrestrained mass construction projects.

We are ALL in this mess together. What one community does, directly affects the quality of life for all the surrounding communities. STRONG STATE LAW is the most equitable way to spread the joy and have the best impact on critical environmental protection.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 13:07:05

No Duplicates.

## **Comment 5 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Ron

Last Name: Bottorff

Email Address: bottorffm@verizon.net

Affiliation:

Subject: AB 32

Comment:

Transportation sources account for the largest share of Calif emissions, at nearly 40% of 1990 levels. The "Scoping Plan" needs correcting regarding the land use planning effect on emissions. The low targets for this sector - only 2 million tons out of nearly 170 million - will fail to create incentives for local jurisdictions and developers to reduce long distance commuting. Please fix this severe flaw.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 14:03:28

No Duplicates.

**Comment 6 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Elaine

Last Name: Booth

Email Address: elaine.booth@cox.net

Affiliation: Women For: Orange County

Subject: Raise importance of land use sector as emissions target

Comment:

Great that we're moving forward to reduce greenhouse gases. But we need to up the importance of the land use sector as a target for emissions reductions, as the emissions generated by long commutes directly relate to this sector. We need to encourage development close to jobs and transit.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 14:11:25

No Duplicates.

## **Comment 7 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Charlotte  
Last Name: Pirch  
Email Address: dpirch@socal.rr.com  
Affiliation: LWV of Orange Coast

Subject: AB 32 Workshop

Comment:

DUE TO SPRawl, THE AMOUNT OF PER CAPITA VEHICLE MILES TRAVELED IS SKYROCKETING. FOR THIS REASON, THE SCOPING PLAN'S ABSURDLY LOW TARGET FOR EMISSION REDUCTIONS IN THE LAND USE SECTOR MUST BE VASTLY INCREASED. THE PLAN MUST ADD CRITICAL MEASURES THAT DISCOURAGE REMOTE, AUTO-DEPENDENT GROWTH AND THAT ENCOURAGE COMPACT DEVELOPMENT CLOSE TO JOBS AND TRANSIT. FOR EXAMPLE, THE STATE SHOULD DIRECT INFRASTRUCTURE DOLLARS TO PROJECTS WHERE LOCAL GOVERNMENT LAND USE PLANS MEET GREENHOUSE GAS REDUCTION TARGETS.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 16:37:09

2 Duplicates.

## **Comment 8 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Jacqueline  
Last Name: Arsivaud-Benjamin  
Email Address: simshona@aol.com  
Affiliation: Friends Of The Creek

Subject: Reducing sprawl to meet greenhouse gas reduction targets.

Comment:

Transportation sources account for the largest share of green house gas emissions, at nearly 40% of 1990 levels, and sprawl is causing the amount of vehicle miles traveled per capita to skyrocket. Yet the Scoping Plan has an extremely low target for emission reductions in the land use sector (only 2 million tons out of nearly 170 million). This is a missed opportunity in an area where public policy has a chance to make a real difference in greenhouse gas emission.

A more realistic and aggressive target will create incentives for local jurisdictions and developers to reduce long distance commuting. The plan must add critical measures that discourage growth in remote areas which can only be serviced by car, and that encourage compact development close to jobs and transit. This would also dovetail with another public policy imperative, which is to reduce the impact of wildfires by not encouraging more development in the wildland/urban interface. The more homes we have in remote areas, the more gas we will force their habitants to consume, and the more we risk devastating losses if wildfires continue to increase in frequency and strength as the climate continues to change.

A specific recommendation would be to have the state direct infrastructure dollars to projects where local government land use plans meet greenhouse gas reduction targets.

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Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 17:43:42

No Duplicates.

## **Comment 9 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Don

Last Name: Seaver

Email Address: [don@donseaver.com](mailto:don@donseaver.com)

Affiliation:

Subject: land use

Comment:

Wise land use choices ( e.g., denser development, public transit, less car-oriented communities, etc.) are one of the most important things we can do to fight climate change. Reducing driving must be a priority!

Thank you,  
Don Seaver. MD

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 20:17:07

No Duplicates.

## **Comment 10 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Lewis

Last Name: Michaelson

Email Address: lmichaelson@katzandassociates.com

Affiliation:

Subject: Land Use and Transportation

Comment:

The inescapable conclusion of most studies on this issue is that land use drives traffic. No serious attempt to reduce emissions from transportation-related activities can be accomplished without dealing with root causes. The proximity or distance between homes and jobs drives traffic congestion, fuel usage and emissions. It is said that building more roads to reduce congestion is like a fat man loosening his belt to deal with obesity. Until land use planning is taken seriously as a tool to manage green house emissions, we will only be re-arranging the deck chairs on the Titanic.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-09 16:27:55

No Duplicates.

## **Comment 11 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Rosemarie

Last Name: Amaral

Email Address: [ramaral@co.fresno.ca.us](mailto:ramaral@co.fresno.ca.us)

Affiliation:

Subject: local built environment in Central California

Comment:

There has been a regional effort through funding from private foundations to create awareness about the built environment and its impacts to public health. Specifically, local governments are working with community partners to create access to healthy foods and physical activity. This being done with support from local foundations such as The California Endowment's Central California Regional Obesity Prevention Program. Programs such as this are educating and creating awareness at all levels of the spectrum from policy makers to community residents. Foundations are supporting local governments and community partners because they recognize the public health impacts as well as the tie to climate change. Recommendation: Make sure to include a thorough evaluation of public health impacts with the scoping plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-14 16:53:41

No Duplicates.

## **Comment 12 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: James

Last Name: Provenzano

Email Address: jjpro@cleanairnow.us

Affiliation:

Subject: Increase Target Reductions for Land Use

Comment:

Due to sprawl, the amount of per capita vehicle miles traveled is skyrocketing. For this reason, the Scoping Plan's absurdly low target for emission reductions in the land use sector must be vastly increased. The plan must add critical measures that discourage remote, auto-dependent growth and that encourage compact development close to jobs and transit. For example, the state should direct infrastructure dollars to projects where local government land use plans meet greenhouse gas reduction targets.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-15 08:59:45

No Duplicates.

## **Comment 13 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Bob

Last Name: Johnston

Email Address: [rajohnston@ucdavis.edu](mailto:rajohnston@ucdavis.edu)

Affiliation: UC Davis

Subject: Local Government Actions

Comment:

Here is the handout for my testimony on July 17, 2008

Policy Brief for California ARB: The Draft Scoping Plan  
Needs Stronger Policies for Land Use and Transportation

Workshop on Draft AB 32 Scoping Plan, July 17, Cal/EPA HQ,  
Sacramento

Professor Robert A. Johnston, Dept. of Environmental Science &  
Policy and Institute of Transportation Studies, University of  
California, Davis ([rajohnston@ucdavis.edu](mailto:rajohnston@ucdavis.edu))

*fæ* The Draft Plan recommends only a 2M ton reduction in GHGs from  
Local Government Actions on land use and local transportation.  
Transportation is 38% of total GHG emissions and is the  
fastest-growing sector, due to VMT growth.

*fæ* There may be slippage in attaining many of the GHG reductions  
in Table 2. Stronger local land use policies could serve as  
backup. Also, they will be essential to attaining the 2050 GHG  
reductions. The ETAAAC says that "decreasing VMT is critical" (p.  
1-9). This distinguished committee covers both economics and  
technology.

*fæ* Cap-and-trade and carbon taxes will not reduce GHGs much in  
transportation, unless the transit, walk, and bike modes are  
widely available in compact urban areas.

*fæ* Decades are needed, to reduce auto travel substantially.  
Transit improvements must be made first, in order for land  
development to respond with infill projects. Both transit and  
compact growth have to occur before large mode shifts can take  
place.

Policy Recommendations:

1. County and MPO GHG targets must be mandated, in order for most local governments to take the necessary actions in land use planning. The recommended statewide target for a 2M ton reduction is too conservative. See research review, below.
2. An Indirect Source Rule for GHGs should be required in all air

districts. This program is under the jurisdiction of the ARB. ISRs will improve the State's economy by making low-density and remote developments pay their full environmental costs.

3. The Report should strongly urge county and regional transportation agencies to make transit, walk, and bike the favored modes of travel and to give them funding priority. Also, the ARB should urge these agencies to study regional transportation scenarios that will reduce total vehicle-miles traveled (VMT) in their regions.

4. The ARB should urge the California Transportation Commission to give priority in funding to transit, walk, and bike facilities. The economic, equity, and health co-benefits of reducing VMT are very large.

5. The ARB should recommend that Caltrans increase funding for Blueprint planning and require recipients to analyze at least one scenario that reduces VMT.

#### Research Review:

1. Increasing mpg will be slow and limited in effect. Because of growth in VMT, it will take at least to 2035 to attain 1990 levels of total GHGs for light-duty vehicles in the U.S., according to a life-cycle analysis where all possible policies were effected (A. Bandivadekar and J. Heywood, Coordinated Policy Measures for Reducing the Fuel Consumption of the U.S. Light-Duty Vehicle Fleet, MIT Sloan Automotive Lab, 2004).

2. Reducing the carbon-intensity of fuels is problematic. Worldwide biofuel production from corn or sugarcane could actually increase GHGs, because of land clearance (T. Searchinger, et al., Use of U.S. Croplands for Biofuels Increases Greenhouse Gases..., Science, 2008). Making biofuels from waste materials is unproven.

3. Congressional carbon tax proposals (and fully-auctioned cap-and-trade credits) would not reduce GHGs in the transportation sector, due to increasing VMT. Using the Energy Information Agency's NEMS model, scenarios with carbon taxes as high as \$60/ton in 2030 did not reduce GHGs in transportation, due to the lack of substitute fuels and to slowly increasing mpg. Only if fuel prices are over \$5/gallon in 2030, do we get GHGs in transport reduced to 2010 levels. (K. Gallagher and G. Collantes, Analysis of Policies to Reduce Oil Consumption..., Harvard Kennedy School, Energy Technology Disc. Paper 2008-06, 2008.)

4. The ARB's ETAAAC has recommended that "Opportunities to improve access while reducing vehicle travel should be the cornerstone of transportation and land use planning" (p. 3-9). They also recommend Smart Growth land use policies, implemented by 2012, motivated by "consistent incentives in infrastructure planning and development" (p. 3-14). This committee has many experts on both economics and on various technologies.

5. Compact growth can reduce VMT and travel costs. Recent modeling by SACOG showed a 7% reduction in VMT, compared to the trend case (2000-2020), with land use measures alone. A Blueprint study in the Twin Cities showed VMT reductions of about 15% in 2030 and one in the Chicago region showed a reduction of 21% in 2020

(Winkelman, Comment on Stone..., J. of the Am. Plng. Assoc., 2008). A recent analysis of the U.S. found that higher urban densities could reduce GHG emissions from transport by 20% in 20 years and 39% in 45 years (J. Marshall, Energy-Efficient Urban Form, Env. Sci. and Tech., 2008). A recent study of the San Joaquin Valley found that VMT could be reduced by 11% (2000-2030) with compact growth and modest transit improvements and no pricing policies (S. Bai, et al., Integrated Impacts of Regional Development..., 2007 conference paper, Dept. of Civil and Env. Engineering, UC Davis).

6. A recent review of the empirical literature found that Smart Growth reduces per capita VMT. This conclusion held for different scales and locations and held constant personal attitudes regarding location and travel (L. Frank and Co., An Evidence Based Review of the Linkages between Land Development Actions and Household Travel Related Emissions, for Env. Defense, July 1, 2008.)

7. Another recent review of the literature found that compact development can reduce per capita VMT by 20-40%, compared to sprawl. This would result in a nationwide reduction in transportation-related GHGs of 7-10% in 2050. (R. Ewing, et al., Growing Cooler, Urban Land Inst., 2007). Transit and pricing policies were not included.

8. I reviewed 40 long-range scenario studies done using travel models and advanced urban models and found that total VMT reductions in 20 years ranged from 10% to 20%, compared to the future trend scenario. In most studies, the highway levels-of-service were the same as, or better than, the trend scenario. The European studies examined dozens of policy scenarios. I published 12 modeling studies of the Sacramento region and found that compact growth, strong expansion of transit, and workplace parking cashout resulted in total reductions in VMT of about 20% in 25 years, compared to the trend scenario. These scenarios were economically better than the trend scenario, especially for low-income households. (R. Johnston, Review of U.S. and European Regional Modeling Studies..., on [www.vtpi.org/johnston.pdf](http://www.vtpi.org/johnston.pdf)).

9. High-density residential buildings reduce per capita energy use in construction and operations of the buildings by a factor of about 2, compared to medium-density buildings. The associated travel energy use was reduced by a factor of almost 4. (J. Norman, et al., Comparing High and Low Residential Density..., J. of Urban Plng. and Dev., 2006.)

#### Conclusions from Research Review:

Recent proposals for a national carbon tax and cap-and-trade will probably not reduce GHGs in the transport sector over time, due to growth in VMT. Low-carbon fuels may not have any effect in reducing GHGs, by 2020. Higher-mpg vehicles will be slow to attain market dominance (20 years or more).

Recent, well-controlled empirical studies show that land use policies can substantially reduce VMT per capita (10-40% over 20-40 years). Modeling studies, using equations derived from empirical experience, give similar results for U.S. and European urban regions of varied size. These modeling studies permit the evaluation of various combinations of transit, land use

densification and mix, and pricing of parking, fuels, and roads. They show that workplace parking cashout is needed, in conjunction with strong expansion of transit and densification of development.

Recent modeling studies by U.S. MPOs show total reductions in VMT over 20-30 years of 10-20%, compared to the trend scenario. Pricing policies were not included.

My modeling studies of the Sacramento region, using advanced urban models, show that compact growth, transit expansion, and parking cashout improve the economy of the region substantially and particularly favor low-income households.

The empirical studies and the modeling exercises both show that California could reduce total VMT in 2020 by 10% and in 2050 by 40%, from a start date of 2010.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-15 10:22:59

No Duplicates.

## **Comment 14 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Clark

Email Address: tclark@hughson.org

Affiliation: City of Hughson

Subject: Local Government Actions

Comment:

Targeting land use is incorrectly viewed as a panacea for reduction of GHG emissions and should not lead to an increase in the statewide target of a 2M ton reduction. Many of the issues people think are caused by poor land use planning decisions are not in the hands of local government or have lower funding priorities with limited resources available. Consider the following:

- a. Schools. School siting for example is one of the leading causes of sprawl in the Central Valley. Local land use laws do not apply to schools. School construction is controlled by the local school district with funding from the State. When schools are sited outside of the orderly growth patterns of a city limit, the resultant stretch of necessary utilities and streets causes growth to extend past planned boundaries.
- b. Jobs-Housing Balance. This is a concept that has many practical obstructions. The high-paying jobs are in the Bay Area but the low cost housing is in the Central Valley. The Central Valley has been trying for decades to attract companies from the Bay Area but the low level of higher education has discouraged most companies to move. There are not a lot of farm laborers with college degrees. So people live in the Valley and commute to the Bay. Things might change if you discourage funding for freeway widening and let the Altamont Pass go to gridlock.
- c. Transportation. 1. Funding for all modes of transportation is below those levels needed to construct needed infrastructure. The City of Hughson for example has a pedestrian and bicycle plan but there are no monies to fund the necessary improvements. As development occurs, those facilities needed to improve bicycle and pedestrian movements are installed but funding for existing areas is non-existent. Within this limited funding scenario, the priority is to always fill the potholes before building bike lanes. 2. Urban and suburban areas have polar opposite public transportation needs and perceptions. In suburban areas, only those in low income brackets ride buses. The result is that those who may wish to decrease their carbon footprint by using public transportation are discouraged by fear - rightly or wrongly. This is a social and educational issue.

- d. Loss of Farmland. The Central Valley produces mostly what one would consider specialty crops. We do not feed the world. We grow almonds. The grocery store where I shop carries Florida oranges. This is an interstate commerce issue. You can't move to Hughson so that you will be next to your food production. The acreage of

farmland in Stanislaus County has actually grown over recent years, not decreased.

e. Blueprint Process. The public participation for the Blueprint Process in Stanislaus County equates to .002% of the population. The percentage is so statistically insignificant; the data should not be used. However, we understand that the legislature now has the camel's nose under the tent in land use by using this process, and we further understand that higher densities in land use will be mandated in the near future. But suburban cities don't build housing. Private development needs to have incentives to build affordable multi-story housing and their money to build comes from the banks, who don't loan on what they consider non-conventional projects. We have tried for years to put innovative projects on the ground but the lending institutes will always have their way. The City of Hughson has the densest per-acre population in our General Plan than any other city in the County but no one will come build in the zones we have provided unless it is the usual R-1 bank financed project. We plan for it but the private sector makes it happen. Again there is a misperception that this is the fault of poor land use planning practices when it is not.

Recommendations:

1. Hold school districts responsible for reductions in GHG emission along with other forms of local government. This will have to be done at the State level through legislative action to amend current laws.
2. Ensure that funding is available for pedestrian and bicycle facilities so that transportation dollars are not all spent on roads.
3. Differentiate between urban and suburban public transportation requirements. Denser populations are better poised structurally and socially to take advantage of public transportation.
4. Include interstate commerce regulation and lending institute reform in the Scoping Plan.
5. Do not increase the 2M ton statewide goal for local government with the mistaken belief that all the land use woes are caused by poor planning when in fact, no matter how good the plan, someone has to want to build it that way.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-18 15:21:49

No Duplicates.

## **Comment 15 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Philip

Last Name: Carville

Email Address: pcarville@carvillesierra.com

Affiliation:

Subject: Need Compact Development

Comment:

We will not reach the CO-2 goals unless the State makes compact, pedestrian oriented, mixed-use land development the preferred option for future housing development. The local development codes throughout the State force developers to build the low-density sprawl that got us into the problem in the first place.

How stupid would it be to have AB-32 regulations omit the most important produced or greenhouse gases? Make the regs include compact housing development and thereby include another important tool to reduce GHG.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-21 15:32:02

No Duplicates.

## **Comment 16 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Darrell

Last Name: Cozen

Email Address: mem4321@aol.com

Affiliation: American Planning Association

Subject: Land Use Planning

Comment:

I believe that CARB needs to give more emphasis to land use planning measures that can reduce the need to drive automobiles. Mixed-use developments allow people to live and work in the same building. Intensive development along transit lines can increase transit use. Bike lanes promote safe bicycle commuting to work and a healthful lifestyle. Pedestrian improvements make transit use and walking more comfortable. It has been estimated that smart land use planning can reduce Greenhouse Gases by 33%, much more than is credited in this plan.

Similarly, improvements in mass transit will get people to use this alternative and reduce vehicle pollutants.

Thanks for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-23 08:52:04

No Duplicates.

## **Comment 17 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Levin

Last Name: Nock

Email Address: Lnock@comcast.net

Affiliation:

Subject: Need smart growth to reduce VMT

Comment:

California has beautiful weather, beautiful scenery, and many flat areas. With Smart Growth urban planning and better ped/bike infrastructure, California could be one of the most wonderful places in the world to ride a bicycle. Davis, CA provides a superb local example of how suburban VMT can be significantly reduced, with smart land use planning and attention to ped/bike infrastructure.

You can reduce VMT by 30% or more by providing pedestrians and cyclists with safe routes to travel, and convenient destinations to travel to.

James Goldstene, ARB executive officer, told the New Partners for Smart Growth this year (2008) that urban households generate half as much VMT as those living in conventional suburban locations. Even households in "smarter growth suburban" locations drive 18 to 39 percent less, according to his presentation.

If California follows 'business as usual' land use patterns until 2020, reaching 2050 GHG goals will be extremely difficult. If California institutes Smart Growth land use NOW, with active programs to convert VMT to BTC and PTC (bike trips completed and pedestrian trips completed), then 2050 GHG goals will be much more achievable.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-23 11:17:33

No Duplicates.

## **Comment 18 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Mark

Last Name: Dempsey

Email Address: dempseys3@yahoo.com

Affiliation:

Subject: Land Use is Primary

Comment:

In reading the comments of others about your draft plan, I can't agree more with them: A plan without adequate land use provisions is worse than no plan at all.

The following points need to be in any working plan:

1. The standard for local planning must be form-based, rather than use-based land-use planning. Zoning as it exists now is unworkable. When rezoning occurs more frequently than following an existing plan (true in Sacramento County now), it exposes the folly of trying to anticipate uses decades in advanced.

The only feasible planning is form-based. Such plans specify intensity of use rather than whether a specific parcel will be commerce, residences, etc. Otherwise you can anticipate an epidemic of rezoning that essentially discards any land-use plan that would support pedestrian- and transit-friendly, mixed-use neighborhoods.

2. Street design.

The City of Houston has literally no General Plan, but manages to produce sprawl because the streets are auto-centric. Unless land use planning addresses Street design, then developing more CO2-producing sprawl highly likely.

3. Financial incentives.

Unless your plan addresses the financial incentives for sprawl, we'll get more sprawl no matter what. Whenever a land speculator can literally make a hundred times what he spends on agricultural land after getting development entitlements -- and that return is un-taxable(!) -- there is going to be enormous pressure to develop an ever-wider swath of sprawl around cities. Removing this incentive is essential.

The Germans have their developers sell the land to the local government at the agricultural price, then re-purchase it at the up-zoned price. They seldom develop 20'-under-water floodplain surrounded by weak levees like Sacramento's North Natomas in Germany, too.

If the above provisions are part of the plan, then you'll have a shot at effective public policy. If not, then we can expect more of the same.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-24 12:28:47

No Duplicates.

## **Comment 19 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Steve

Last Name: Raney

Email Address: [cities21@cities21.org](mailto:cities21@cities21.org)

Affiliation: Cities21, Palo Alto

Subject: parking charges for worktrips

Comment:

I want to amplify on a portion of Bob Johnson's June 27 comment regarding "parking charges for worktrips."

The state should impose a \$6 per day per parked car work parking tax, allowing employers the flexibility to implement a much more palatable combination of \$2 per day parking charges combined with \$4 per day cashout. The tax should be gradually phased in, starting at \$1 per day and growing to \$6 per day. The phasing should start with large employers and gradually expand to cover smaller employers. The phasing should begin within the state, but gradually expand beyond state and national boundaries.

This policy will reduce state CO2 by 6.3M tons per year.

20 pages of detailed policy and implementation research can be found at: <http://www.cities21.org/paidParking.htm> . This new, improved parking charge/cashout policy comes from the U.S. Environmental Protection Agency's "Transforming Office Parks into Transit Villages" Study.

\$2 parking charge + \$4 cashout policy summary:

- \* Start with \$0.25 per day employee parking charges and \$1.00 per day employee cashout. A cashout is where the employer pays employees not to park at the office.

- \* Employees are assured that all parking charge revenue goes to fund cashout.

- \* Charges and cashout increase gradually over time (to \$2.00 and \$4.00 per day) as other companies adopt the same program, ensuring that no Human Resources (HR) recruiting/retention disadvantage is created. (If Company A and Company B are competitors, and if A charges \$2 for parking and B has free parking, then B has a "\$2 per day" recruiting advantage over A. Hence, both A and B have to participate for the proposal to work.)

- \* Implement monthly employee reporting via a trust-based, self-reporting HR web applet (one Bay Area company uses this approach). Incorporate other employer commute benefits into this monthly reporting (Commuter Check - pre-tax transit passes, private WiFi express bus service, etc) to ensure that "double benefits" are not provided to employees. Self-reporting makes implementation very low-cost for employers. The company reports that 20% of employees are under-collecting the cashout, validating that company's trust in its employees.

- \* Position "cashout + parking charges" as part of a comprehensive employer commute reduction program. Educate employees about the unique behavior-changing/demand-reducing properties of parking

charges (23% commute mode shift is expected). Besides reducing CO2, this scheme will: a) ease severe parking shortages at some office campuses, b) create real-estate in-fill opportunities (by permanently reducing cars parked at offices, this scheme enables smart new in-fill on land that was considered to be "built out"), and c) motivate cities to reduce parking maximums for new office development.

\* Parking spaces take up valuable land. Employers have to pay for parking space land used by drivers. Employers save money when workers commute via green alternatives (transit, car/van pool, bike, walk, and telecommute) that do not require land for cars. Hence, Bay Area employers provide a hidden \$7.59 daily subsidy to SOV commuters. This cashout + charges scheme reduces land consumption, increasing the economic efficiency of employers. Further, the current policy of subsidizing SOV commuting harms the environment.

\* "Charging for parking is the single most effective strategy to encourage people to use alternatives to the SOV" - Jeff Tumlin, Nelson Nygaard Associates.

The policy should be revenue-neutral for business, provided cities allow employers to monetize the freed surface parking real-estate. The state should nurture and facilitate such monetization. From a state budget perspective, "pricing policies" such as this are three orders of magnitude more cost-effective for CO2 reduction than proposals requiring capital expenditures. The state should budget staff time to facilitate implementation. For employees, this policy represents a small transfer payment from solo driving commuters to users of commute alternatives.

Two previous studies are relevant: A) A 1989 paper ("Parking Subsidies and Commuter Mode Choice: Assessing the Evidence," by Richard Willson, Donald Shoup, and Martin Wachs) finds commute rewards are less effective than charges: "A program of transit and vanpool subsidies as well as preferential parking for carpoolers had little effect until [Twentieth Century Corporation in Los Angeles] raised the price of employee parking from no charge to \$30 per month for solo drivers. Solo driving decreased from 90 to 65 percent after pricing." B) A 1990 paper ("Proceedings--Commuter Parking Symposium" by Metro and Association for Commuter Transportation, Seattle, Washington) found that charges changed behavior where incentives had not: "CH2M Hill in Bellevue, Washington began charging solo drivers \$40 per month for parking, the amount the company pays the building owner for parking. All employees receive a \$40 per month travel allowance in their paychecks. Carpoolers park for free. Walkers, cyclists and drop offs keep the travel allowance. Solo driving declined from 89 percent to 64 percent after the parking policies were put into place."

LUSCAT staffers Jeff Weir and Panama Bartholomy are familiar with this policy proposal/research.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-27 16:17:36

No Duplicates.

## **Comment 20 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Steve

Last Name: Raney

Email Address: [cities21@cities21.org](mailto:cities21@cities21.org)

Affiliation: Cities21, Palo Alto

Subject: Better Land Use Effectiveness Measurement

Comment:

One of my gripes is that the public sector is really bad about measuring results.

LUSCAT is sincere about climate protection, so we must have very high quality data so that we can measure the progress of state and regional land use policy implementation. Otherwise, we will just be proposing a series of projects without being able to ascertain their effectiveness. If the projects don't work, we need to know rapidly, so that we can change course to meet 2020 carbon targets. Currently, land use related measurement is primitive. We don't really know what is happening.

We need innovation in measurement of journey to work information: home origination address and work destination address. We must have 95% or better coverage of all CA workers and we must have that data updated every year. 50% of household VMT occurs from commuting.

CURRENT, INSUFFICIENT DATA:

The Census Transportation Planning Package CTPP3 Flow Data provides "1 in 10" coverage of journey to work, every 10 years, but the data takes about six years to come out. The data is stale by the time it is available. LEHD (Local Employment Housing Dynamics) data holds the promise of providing 80% or better coverage for journey to work data, but there are many problems with the current CA implementation.

As far as work trips. A little bit more than 50% of household VMT is in commuting. See Jonathan Rose and Calthorpe: ([http://www.cities21.org/HH\\_NRG\\_consumption.htm](http://www.cities21.org/HH_NRG_consumption.htm), <http://www.cities21.org/HomeEnergyUseJonathanRoseLLC.xls>). The average annual Bay Area commute is about 6,720 miles. 14 mile one-way commute and 240 commuting days. To meet 2050 CO<sub>2</sub> goals, we surely need to cut average one-way commute distance dramatically.

The 2006 JAPA Robert Cervero / Michael Duncan paper argues for emphasizing efforts to reduce jobs/housing distance to reduce VMT. The article is "Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing?" in the Autumn 2006 JAPA. It's not that Cervero is arguing against smart growth to minimize VMT on the 84% of non-work trips, he's just saying that we have to place a higher priority on the 16% of journey-to-work trips to reduce VMT.

#### RECOMMENDATION:

The state should modify CA Income Tax forms (just slightly) to collect work address data, to provide 95% or better coverage of CA journey to work, updated each year. Once state law has been changed, then the data can be collected by the State Labor Market Information (LMI) office. Public sector journey to work data should also be developed.

The resultant journey-to-work database should be "anonymized" to the point where no "personally identifiable" data is stored. LMI should establish procedures to anonymize the data and safely destroy the personally identifiable source data.

#### HERETOFORE IMPOSSIBLE QUERIES MADE POSSIBLE:

- \* San Ramon and Dublin were the fastest growing residential communities in the Bay Area in 2007. 6,000 new housing units were added. What is the distribution of work destinations for these new residents? Is the average journey to work distance shorter or longer than we expect? Are our new policies working like we expected?
- \* We've added a super new master planned community in Tracy. Their marketing brochure promised that this would be an exceptionally green place, with solar on every rooftop. What's the journey to work like for those 2,000 new 3,000 square foot single family homes?
- \* It's 2010. Our RHNA policy to balance jobs/housing in affluent, job-rich suburbs is in place. How are we doing?
- \* We implemented policies to reduce commute distance in 2009. How did we do? We then made the policy stronger. How did we do in 2010?
- \* Provide a picture of the commute distribution of Bay Area extreme commuters, covering 95% or more of those commuters.
- \* Is there a need for subscription commute bus service from Manteca to San Ramon's Bishops' Ranch? Using NJIT's algorithmic bus route optimization software, where should we place bus stops to attract the most riders?
- \* We have a new Alameda County dynamic ridesharing service. Where should we target our marketing efforts?
- \* By May 2013, answer the question: In 2012, where were the new housing units built for Bay Area workers?

#### ADDITIONAL BENEFIT:

- \* Provides very useful and accurate input data for MPOs and transit agencies for travel demand forecasting models. Makes modeling better.

#### BACKGROUND:

The study of journey to work is a bit of its own field. One example of some of the things that we do with CTPP3 data can be found in the Bay Area Business Park Catalog:  
<http://www.cities21.org/BABPC/>. A three-paragraph description follows:

We have identified 17 Bay Area suburban major employment centers, 13 in Silicon Valley. The 17 centers are mostly traditional suburban office parks with many tech workers. Exceptions to traditional office parks include: a) Emeryville is an edge city with more than 1MM square feet of retail and extensive

residential, b) Stanford University encompasses the University, the regional Stanford Shopping Center, Stanford Hospital, and downtown Palo Alto, c) SJC is the San Jose airport major activity center, d) Walnut Creek is a suburban downtown with dense employment.

Each center has at least 15,000 jobs. The 17 centers support a total of 594,000 jobs. SOV commute mode share varies from 85% to 65%. The Stanford University job center stands out with 16.8% of commuters biking or walking to work. The other 16 job centers clump between 4.9% and 0.6% bike/ped commute mode share.

Stanford's programs to put housing by jobs are shown as a singular success in the high-mileage world of suburban job centers.

Commute distance appears longer than was previously thought. A mean "crow flies" one-way commute distance (Stanford Research Park) of 14 miles translates into roughly 18.2 driving miles. Other commute surveys report Silicon Valley commute distance of 14 miles. The CTPP3 data used in this EPA study uses a larger sample than other studies and has less "self selection bias." This result may point out that the high income workers in job centers live farther away than typical suburban workers, or it simply may point out that other phone surveys underreport commute distance, because higher income workers are more likely to hang up on tele-market researchers.

This proposal derived from meetings with: Nanda Srinivasan (Consultant, CTPP and National Household Travel Survey), Ed Christopher (FHWA, Chair TRB Census Transportation Committee), Elaine Murakami (FHWA, Mgr, CTPP and National Household Travel Survey), Chuck Purvis (MTC), Eileen Rohlfing (State Employment Devt Dept, Labor Market Information Division). This policy proposal comes from the U.S. EPA's "Transforming Office Parks into Transit Villages" Study.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-27 16:41:54

No Duplicates.

## **Comment 21 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Steve  
Last Name: Raney  
Email Address: [cities21@cities21.org](mailto:cities21@cities21.org)  
Affiliation: Cities21, Palo Alto

Subject: Commute Reducing Housing

Comment:

(cuts 3.0M tons CO2/yr)

For new apartments and condos, Commute Reducing Housing (CRH) selects residents with fewer cars who will drive less. Fair Housing policies do not allow discrimination against minorities, but it is legal to discriminate in favor of residents who will produce less CO2.

Applying CRH to 1,000,000 of the new homes built to accommodate CA's population growth in the coming years will save 3.0M tons CO2 per year. This policy is "beyond smart growth best practices," so the state should actively nurture and facilitate implementation, assisting cities in developing policy and undertaking legal/demographic analysis. The state should facilitate this policy to where a tipping point is reached and the policy can spread of its own momentum. From a state budget perspective, advocating such innovations represents an approach that is three orders of magnitude more cost-effective for CO2 reduction than proposals requiring capital expenditures.

When TOD or "jobs balancing housing" is built, too often drive alone commuters crowd out lower VMT residents in occupying this scarce, desirable housing. CRH can be used to reduce drive alone commuting from TOD. Palo Alto commute transit mode share is about 4%, growing only to 17% in TOD next to commuter rail stations. CRH can increase this mode share dramatically.

For more details including case studies (Redwood City, Stanford, and Santa Barbara), applicable fair housing law and demographic analysis, FAQ, employee/resident tenure analysis, etc:, please see: <http://www.cities21.org/workerHsng.htm>.

Three pioneering CRH examples: Stanford, Santa Barbara, Redwood City

1) Stanford West: 628 apartments

Stanford provides priority to local workers with very short commutes, saving 2.6 million annual vehicle miles traveled and 2.6 million annual pounds of CO2. Stanford West residents with green commutes receive a 10 percent monthly rent discount. Stanford provides a top-notch shuttle bus system and an extensive dedicated bike path network. Stanford charges \$51 per month for employees to park on campus, and that parking isn't very convenient.

2) Santa Barbara's Casa de Las Fuentes

For 42 affordable downtown apartments with excellent access to jobs, shops, recreation, and transit, Santa Barbara adopted green commute housing preferences:

First priority: for residents who work downtown who do not own a vehicle and agree to not own one during their occupancy. Rent is \$50 per month less for residents who do not park a car. All employed household members must work only in the downtown area.

Second priority: for residents who work downtown  
The 42 unit development has only TWENTY CARS!

3) Redwood City's Peninsula Park - 800 condos

This project has been approved by the city and further wetlands approvals are underway. It represents the U.S.'s first proposal to apply CRH to market rate condos. Redwood City has a vibrant mixed-use downtown with a Caltrain commuter rail station. There are 85,000 jobs within 3 miles of the project site. The Peninsula Park project will feature a 0.8 mile bike path to downtown and a 1.4 mile shuttle bus route to downtown. The developer's banker has already approved CRH - that's an important occurrence that should be noted. Innovations such as these are not readily supported by the real-estate lending community.

Calculation: 1,000,000 new homes under CRH \* 3 tons CO2/yr saved per eliminated commute = 3.0M tons CO2/yr.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-27 17:13:24

No Duplicates.

## **Comment 22 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Mitchell

Last Name: Austin

Email Address: [maustin2@comcast.net](mailto:maustin2@comcast.net)

Affiliation: Urban Planner

Subject: Reducing Vehicle Miles Traveled through Land Use

Comment:

The Draft AB 32 Scoping Plan does a great job of identifying all the various parts of the carbon emissions equation. However, the document seems to miss the key role that land use plays in increasing or decreasing energy consumption. The more land human habitation consumes the more energy it takes to move the people, goods and services around in order for an economy to function. In other words you could provide every driver in the State of California with an H2 Hummer and reduce vehicular emissions if accompanied by a reduction in vehicle miles traveled from the present levels of around a 1,000 miles a month to 200 miles a month or less. The way to accomplish an economically viable reduction in vehicle miles traveled is to alter the built environment in order to encourage the use of alternative transportation modes (mass transit, bicycling, walking). Local government regulations are the key to altering the built environment; however without State leadership and acknowledgement of the role of land use in the reduction of greenhouse gas emissions it is unlikely that local governments will substantively change land use requirements. Without significant changes to land use patterns, the lofty emissions reduction goals of AB will not be met.

Thank you for your time and consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 13:29:17

No Duplicates.

## **Comment 23 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Ken

Last Name: Grimes

Email Address: [kgrimes@walksandiego.org](mailto:kgrimes@walksandiego.org)

Affiliation: WalkSanDiego

Subject: WalkSanDiego Comments on Scoping Plan

Comment:

WalkSanDiego is a 501(c)(3) non-profit organization dedicated to providing a safe, inviting, and convenient pedestrian environment throughout the San Diego region. For the last 10 years, we have worked with the San Diego Association of Governments, local cities, developers, schools, neighborhoods, merchants, and individual residents to identify and fund improvements for walking safety, security, and enjoyment. WalkSanDiego has reviewed the Scoping Plan and is pleased to submit the following comments.

Your staff and board are to be congratulated for making appropriate progress on the difficult tasks of examining the myriad available approaches to reduce greenhouse gases (GHG), operating under an urgent time schedule, while simultaneously providing to the public regular updates and opportunities for meaningful input.

WalkSanDiego is deeply concerned that the Plan gives little weight to alternative transportation modes, and reforming the continual march of land development into undeveloped areas in a low-density pattern. In our view, and that of most people with whom we work, the time for subsidizing and mandating sprawl must end, and the sooner the better. At the very least, sprawl and walkable communities should be presented as options on a level playing field. Working with many types of residents, from wealthy suburbanites to lower income Hispanic residents, we find that a majority of residents would welcome communities in which walking and bicycling are real choices. This is no doubt true across the state, especially as gasoline prices skyrocket.

Children especially need to have other travel options, for their own cognitive development, as well as their health. The epidemic of obesity is not, as some argue, about the consumption of fast food and junk food; rather, it is about a precipitous drop-off in physical activity, primarily due to environmental constraints. This needs to change for many reasons, not the least of which is that sprawl threatens to undermine any real progress on reducing GHG emissions.

We have been following with great interest the evolution of the San Joaquin Valley Unified Air Pollution Control District's Indirect Source Rule. This regulation rewards compact development offering multiple travel modes, and imposes fees on sprawl on a per housing unit basis. This provides a funding mechanism for transit services, something the state has struggled to do for many years. (In fact, recent state cuts to transit have been an extreme

short-term fiscal measure, in the wrong direction for GHG reduction.) The San Joaquin Valley's Indirect Source Rule is the sort of regulatory program that every region of the state should have, and we urge ARB to add it to the mix of Scoping Plan measures.

Further, the state needs to establish a state planning mandate modeled after the most successful programs of other states. These include Wisconsin, Oregon, Maryland, Vermont, and Florida. The program should require California's laws and local land use regulations to favor low-carbon development and transportation infrastructure. Every city should be mandated to adopt a climate plan that includes reductions in vehicle miles travelled.

Finally, the Scoping Plan should emphasize the use of transportation dollars for non-motorized travel and transit services, and reduce its commitment to continuous freeway expansion in a failed bid to reduce congestion. Caltrans should be mandated to weigh greenhouse gasses in every transportation decision, and consider every low-carbon alternative to further freeway building.

Thank you for the opportunity to comment. I can be reached at [kgrimes@walksandiego.org](mailto:kgrimes@walksandiego.org), 619-544-WALK(9255).

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 13:54:32

No Duplicates.

**Comment 24 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: John

Last Name: Holtzclaw

Email Address: john.holtzclaw@sierraclub.org

Affiliation:

Subject: efficient land use

Comment:

. Include stronger measures to reform land use planning in ways that reduce vehicle miles traveled.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-28 17:50:15

4 Duplicates.

## **Comment 25 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Carolyn

Last Name: Chase

Email Address: cdchase@movesandiego.org

Affiliation:

Subject: Put Transit First / require CMP mitigation to transit

Comment:

Move San Diego is a non-profit organization working to create convenient, on-time, healthy, sustainable transportation throughout the San Diego region. Currently, our major focus is working with business, environmental, and government interests to create a transit system which is competitive in every way with private automobiles, and to reform land use planning to emphasize compact development conducive to transit, bicycling and walking.

Move San Diego has reviewed the Climate Change Draft Scoping Plan and are pleased to submit the following comments.

First, we are pleased to see that the Air Resources Board takes very seriously the ambitious timelines laid out in AB 32. It appears regulations and programs will be in place in a timely manner as prescribed by the law. We also commend ARB for due consideration of co-benefits of GHG regulation and the need to avoid disproportionately large impacts on underrepresented populations.

Put Transit First

The Plan should make an unequivocal commitment to state transit funding. While ARB pursues GHG reductions on the one hand, the governor and legislature continue to cut funding for transit services. The San Diego region, as elsewhere, is experiencing dramatic increases in ridership, but is in a crisis mode financially. Services are being cut, managers at the transit agencies are being laid off, and service disruptions have increased. Fuel prices have increased dramatically as well. It is hard to imagine a worse time to cut state transit funds.

Now is the time to put transit on an equal footing with other transportation funding. Eliminate the many biases in the CEQA and Congestion Mitigation Plan programs that elevate LOS over transit needs. Require mitigation to go for transit.

Promote Global Best Practices in transit planning and implementation for cities. Especially look at the high-performing Bus Rapid Transit of Brisbane, Australia.

In California, transit is currently a step-child of infrastructure planning and funding, when in reality, you cannot achieve smart growth without smart transit. Such transit must be designed to attract choice riders and best serve our land use patterns which have dispersed origin-destination patterns.

If you study the large cities of the world, no city can grow above approx. 3-4 million while maintaining a high quality of life without strategic transit investments. Our cities will either grow more in the direction of Paris or more in the direction of Cairo and it's transit that makes or breaks the kind of growth that will happen.

Without transit systems designed to emphasize network connectivity, time competitiveness with the car and customer experience, we are doomed to experience increasing traffic and pollution and decreasing quality of life.

We must overcome our "freeway-centric" and car-centric planning to maintain our economic vitality and quality of life and make the transit investments required to keep us moving and competitive since everyone who uses transit fees up space for those who must drive while also being necessary to reducing GHG since the transport sector contributes almost half of GHG in California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 07:55:25

No Duplicates.

## **Comment 26 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Carolyn

Last Name: Chase

Email Address: cdchase@movesandiego.org

Affiliation:

Subject: Revising State Planning Laws

Comment:

Revising State Planning Laws

In California, there remain significant institutional obstacles to limiting sprawl and favoring low-carbon development. These include zoning ordinances, code requirements, parking requirements, CEQA's emphasis on congestion and LOS bias, transportation funding formulas and mechanisms, private lending practices, hidden subsidies to parking, taxation biases favoring big box retail, and aspects of the planning process itself.

Judging from the successes of other states it is possible to mandate more effective comprehensive planning in every jurisdiction throughout the state. California's current planning mandates, which are followed loosely at best, and with virtually no meaningful outcome goals, are inadequate to address urgently needed limitations on GHG, just as they have not been adequate to meet present day problems such as traffic congestion, water supply shortages, habitat destruction, and affordable housing.

Measure 13 includes working with local governments to "develop targets to reduce greenhouse gas emissions on a regional basis." The suggested targets are just that - suggested. We believe AB 32 implementation, if pursued seriously, requires significant revisions to the state's planning laws to make regional targets enforceable. It is not adequate, to simply state, "...ARB encourages local governments to set municipal and community-wide 2020 greenhouse gas reduction goals and adopt measures and best practices to meet those goals" (page 32). The state has long encouraged better planning, to no avail.

Now is the time to reform land use planning in ways that provide both incentives and enforcement opportunities that require:

- reductions vehicle miles traveled.
- equal the playing field for transit vs cars
- allow and require mitigation for traffic to go for transit especially in the CMPs
- See also the Addendum to the 2007 Regional Transportation Plan Guidelines adopted by the CTC on May 29, 2008

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 08:01:23

No Duplicates.

**Comment 27 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Kim

Last Name: Floyd

Email Address: kimffloyd@fastmail.fm

Affiliation:

Subject: Land Use Requirement to Reduce CO2

Comment:

- Continue the Attorney Generals efforts by including stronger measures to reform land use planning in ways that reduce vehicle miles traveled.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 11:42:12

No Duplicates.

## **Comment 28 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Christina  
Last Name: Ragsdale  
Email Address: [crcommunications@sbcglobal.net](mailto:crcommunications@sbcglobal.net)  
Affiliation: Private Citizen

Subject: Compressed Work Schedules/Teleworking

Comment:

A very quick and relatively simple way to achieve early results is to require all government offices (including local government, special districts, etc.) to modify work schedules to 4/10 days. This has been done by a number of agencies and has been required of State Agencies by the Governor of Utah. It saves fuel costs for employees and energy costs for employers.

Also, aggressively pursuing teleworking options for employees where possible should be encouraged and perhaps incentivized. I have observed (with long experience in government) that the primary barriers to greatly expanded teleworking for employees is a social/societal/management barrier rather than a technological one. Even moderately-increased teleworking could reap large benefits in fuel and emissions savings.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-29 12:50:19

No Duplicates.

## **Comment 29 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Lilian

Last Name: Lee

Email Address: [lilian2004@gmail.com](mailto:lilian2004@gmail.com)

Affiliation:

Subject: Land use requirement to reduce greenhouse gas

Comment:

Land use requirements should include reducing greenhouse gas. According to Senior UN Food and Agriculture Organization (FAO) official Henning Steinfeld, "Livestock are one of the most significant contributors to today's most serious environmental problems ...", and "Urgent action is required to remedy the situation." The reasons include:

1. "...the livestock sector generates more greenhouse gas emissions as measured in CO<sub>2</sub> equivalent - 18 percent - than transport. It is also a major source of land and water degradation."
2. "It generates 65 percent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO<sub>2</sub>. Most of this comes from manure. And it accounts for respectively 37 percent of all human-induced methane (23 times as warming as CO<sub>2</sub>), which is largely produced by the digestive system of ruminants, and 64 percent of ammonia, which contributes significantly to acid rain."
3. "Livestock now use 30 percent of the earth's entire land surface, mostly permanent pasture but also including 33 percent of the global arable land used to producing feed for livestock, the report notes. As forests are cleared to create new pastures, it is a major driver of deforestation, especially in Latin America where, for example, some 70 percent of former forests in the Amazon have been turned over to grazing."
4. "The livestock business is among the most damaging sectors to the earth's increasingly scarce water resources, contributing among other things to water pollution, eutrophication and the degeneration of coral reefs. The major polluting agents are animal wastes, antibiotics and hormones, chemicals from tanneries, fertilizers and the pesticides used to spray feed crops. Widespread overgrazing disturbs water cycles, reducing replenishment of above and below ground water resources. Significant amounts of water are withdrawn for the production of feed."

For more detail information about livestock, please click the below link: [www.fao.org/newsroom/en/news/2006/1000448](http://www.fao.org/newsroom/en/news/2006/1000448).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse->

ws/34-toarb-072908-2.doc

Original File Name: toARB-072908-2.doc

Date and Time Comment Was Submitted: 2008-07-29 22:19:35

No Duplicates.

## **Comment 30 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Chris

Last Name: Fitz

Email Address: cfitz@mclw.org

Affiliation: LandWatch Monterey County

Subject: Land Use

Comment:

Land Use

Vehicle miles traveled (VMT) is projected to increase by 66% between 2006 and 2030 ("2007 California Motor Vehicle Stock, Travel, Fuel Forecasts", Caltrans, May 2008). This increase is significantly greater than forecasts for population growth during the same period of 32%. Travel growth is related to greater car ownership, increased trip-making and longer commutes. All these issues are fundamentally related to land use and urban sprawl.

Reducing travel would be addressed by Local Government Actions and Regional GHG Targets. It is estimated that this voluntary measure would reduce emissions by 2 MMTCO<sub>2</sub>E or 1% of the total recommended reductions. The Scoping Plan should assign more emission reductions to this sector. Additionally, emission reduction targets should be enforceable through regional planning efforts or indirect source review rules that are legally enforceable through air pollution control districts.

The Scoping Plan should also include greater funding from State transportation funds for public transit and other forms of alternative transportation. Transit funding from government funds has continually declined throughout the years - a trend that needs to be reversed if California is to reduce single occupancy travel and reduce GHG emissions.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 07:45:15

No Duplicates.

## **Comment 31 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Jim

Last Name: Leddy

Email Address: [jleddy@nctpa.net](mailto:jleddy@nctpa.net)

Affiliation: Napa County Transportation and Planning

Subject: Section 13 - Draft Climate Protection Scoping Plan

Comment:

Page 31 of the Scoping Document, section 13, discusses local government efforts in setting quantifiable emission reduction targets. I would ask that consideration in the next step of review combining this discussion with transportation.

The reason for this is that County by County all local jurisdictions come together in their Congestion Management Agencies and plan transportation systems and have strong land use discussions as part of those processes. Further, as in the Bay Area, several CMAs are coordinating Climate protection efforts or starting the process to do so.

Many local governments have already begun, as was noted, climate protection efforts. These efforts are happening at the most local level and delivering immediate results.

I would request that those efforts are acknowledged, measured and local entities given state support to further collaborate locally on regional emission reductions. ARB should set the Goals and support local efforts to achieve.

I have attached our local effort we initiated with Bay Area Air Quality District support. It has brought all of our jurisdictions together and we are moving towards a regional goal delivery.

Finally, I would recommend that local efforts that combine land use and transportation planning into a holistic approach be supported.

Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/37-nctpa\\_item\\_15\\_-\\_climate\\_protection\\_circuit\\_rider\\_intro.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/37-nctpa_item_15_-_climate_protection_circuit_rider_intro.doc)

Original File Name: NCTPA Item 15 - Climate Protection Circuit Rider Intro.doc

Date and Time Comment Was Submitted: 2008-07-30 10:28:43

No Duplicates.

## **Comment 32 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Brent

Last Name: Eidson

Email Address: beidson@sandiego.gov

Affiliation: City of San Diego

Subject: Land Use and Local Government

Comment:

1) The draft Scoping Plan is silent on increased state funding for local transit projects and operational costs. Increased availability of transit is critical to the success of transit villages and transit oriented development. Revisions to the city's Land Development Code to address reduced parking ratios, parking maximums, shared parking strategies, etc. are contingent upon the provision of an enhanced and efficient transit system. Recent state funding cutbacks to transit has resulted in reduced transit services in the San Diego region.

2) ETAC review: p.3-12

Smart Growth and Transit Villages- More emphasis should be placed upon the state providing additional funding for transit (both for infrastructure and to increase service). This will allow jurisdictions to address regulatory obstacles such as parking ratios, prohibitions on tandem parking and reluctance to allow shared parking to fulfill parking requirements. It also allows for increases in density and a mix of uses which, as the report notes, results in a reduction in vehicle miles traveled (VMT).

3) p.33 - Regional Targets

The expected greenhouse gas emission reductions for land use and transportation planning are anticipated to be very low, according to the report. If land use strategies are believed to achieve only minimal results, then there will be little incentive for local governments to make the difficult decisions to support smart growth. It may be that the numbers appear low because smart growth and transit investments occur in limited areas, while the results of their projected benefits are spread over the entire built environment. In order to gain a better understanding of the role of, and potential emission reductions that can occur through land use and transportation strategies, focused areas should be studied and compared to conventional, auto-oriented development. In addition, current modeling practices do not likely capture the change in driving habits that is rapidly occurring due to the increasing cost of gasoline. Better transit and land use planning will provide people with opportunities for more affordable living, and is likely to be an important part of California's future. Not mentioned in the report is the crucial need for more transit funding to make smart growth work. San Diego's recently updated General Plan includes a "City of Villages" strategy for new growth to be focused in transit-served areas. However, the local reality is that the San Diego region has been forced to cut transit service due to lack of funding.

4) ETAC ETAAC Final Reportp. 3-8 - Consumer Education Education about the benefits of reduced driving will not be effective if people do not have access to alternative forms of transportation, or the ability to live in areas where they can walk to school, stores, and services.

5) p. 3-12 Smart Growth and Transit Villages Not adequately mentioned in the report is the crucial need for more transit funding to provide Californians with an effective alternative to driving. San Diego's recently updated General Plan calls for development to be focused in transit corridor and station areas in order to increase transit use and cut emissions. However, the local reality is that the San Diego region has been forced to cut service due to lack of funding.

We suggest that the report further explore the potential role of public transit, and include strategies to increase transit operations funding. A potential source of information is a study prepared by the Transit Cooperative Research Program (TCRP) of the Transportation Research Board (TRB). The report, entitled Public Transportation's Contribution to U.S. Greenhouse Gas Reduction, shows that a solo commuter switching his or her commute to public transportation can reduce a household's carbon emissions up to 30 percent.

6) p. 3-13 Concur that state CEQA Guidelines should be revised to better evaluate multi-modal transportation impacts and benefits. It is not productive for a CEQA document to call out a higher density, smart growth project as having significant impacts that can be mitigated by lowering density, if the alternative to providing that housing is to continue urban sprawl practices. It would be helpful to explore the potential to evaluate the impacts of urban infill development based on per capita impacts (VMT, water use, etc) compared to a regional or state-wide "norm."

7) p. 3-14 A key obstacle to implementing smart growth is inadequate funding for transit investments and operations.

8) p. 3-15 Concur that LOS Guidelines are an auto-centric measure of mobility, as a transportation corridor may have a poor street intersection LOS, yet excellent transit service and pedestrian mobility. However, any changes to the LOS measures would also need to address the air quality impacts that result from congestion hot spots.

9) p. 7-12 Please explore how mitigation requirements and perhaps in-lieu fees may be used to further support strategic tree planting.

10) ETAC P.3-15 We do have concerns regarding the recommendation that: "The use of Level of Services (LOS) as a measure of environmental impacts for transportation projects under CEQA should be replaced with broader measure of access to goods and services and quality of life." The LOS of transportation facilities is included within DSD's significance thresholds, and is a measure of the length of time people are waiting at intersections and other transportation facilities. However, the LOS is not just a measure of automobile convenience as stated on the third paragraph of that page. It also is used to determine air quality impacts since exhaust emissions can potentially cause direct localized "hotspot" impacts (CO) near or at new developments and air quality impacts are exacerbated by congestion

(vehicles either idling or moving at a slow or stop and go pace). We are concerned about air quality (another CEQA issue) due to the potential health impacts on sensitive receptors. Therefore, I believe that DSD would have concerns about the replacement of currently defined LOS as a measure of environmental impacts for transportation impacts under CEQA and would need to know more about the potential addition of broader measures including access to goods and services and quality of life. The terms should be carefully defined since we would need to know, for example, how quality of life would be defined in the CEQA context. How would the environmental impacts of each of any of the newly included measures be defined and quantified, and what suggested significance thresholds would be proposed?

11) ETAC p. 7-12 One of the tasks that DSD is undertaking as a component of the City of San Diego General Plan Action Plan is the incorporation of measures such as tree planting as formal mitigation. State assistance would be appreciated in quantifying such measures and developing such a program.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 11:19:10

No Duplicates.

## **Comment 33 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Bill

Last Name: kortum

Email Address: blkortum@sbcglobal.net

Affiliation: Sonoma Co. Transp/Land Use Coalition

Subject: Land Use & Local Government - Vehicle Miles Traveled

Comment:

Local governments have a major role in California's determination to reduce GHG. Without local governments complete emersion in the GHG reduction campaign, the State will increasingly be required to mandate actions that generate public resistance to have their lifestyle altered.

Local government decisions are heavily influenced by the promise of incentive rewards for accomplishing goals, one of which is the continuous reduction of VMT. Five years ago councilperson Jane Hamilton in Petaluma found roughly 35 times in a year of council meetings where decisions were made that could affect VMT reduction..

If State transportation funds were rewarded on the basis of VMT reduction by a community, the Petaluma Council would have considered VMT reduction in each of those 35 land use and parking decisions.

ARB deliberations should include incentives:

1. Make VMT and other indicators readily available to local government.
2. Establish indicators such as a VMT as benchmarks.
3. Reward local government with financial incentives from various state funding pools when progress toward benchmark indicators are accomplished.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 11:48:30

No Duplicates.

**Comment 34 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: ryan

Last Name: sotirakis

Email Address: rsotirakis@hotmail.com

Affiliation:

Subject: land use

Comment:

Not enough is done to address land use and reducing VMT in the Draft Scoping Plan. The only significant way to reduce carbon emissions is through new land use regulations and encouraging the development of better mass transit systems. Please consider these components in shaping a cleaner California!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 15:43:39

No Duplicates.

## **Comment 35 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Cory

Last Name: Brennan

Email Address: cory8570@yahoo.com

Affiliation: Green Leadership Consortium

Subject: Forests and other land use

Comment:

It is vital that subsidies be stopped for logging virgin timber on state or federal land, or anywhere else.

We need to provide incentives for recycling and treeless paper and "wood" products, so as to create less need to cut trees.

Use of intact ecosystems for new development should be halted completely. There are many other solutions for development - there is much degraded land that could be used, and urban planning that could be done to eliminate our necessity to destroy yet more ecosystem for McMansion development. Our economies can remain healthy without cowtowing to vested interests, and the time for vested interests to determine the future for us and for our children is over.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 08:08:42

No Duplicates.

## **Comment 36 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Eric

Last Name: Chase

Email Address: [galoisgroupie@gmail.com](mailto:galoisgroupie@gmail.com)

Affiliation:

Subject: Commitment to Smart Land Use

Comment:

Thank you for making this very convenient forum available for public comment on the Draft Scoping Plan.

Transportation accounts for about 40% of greenhouse gas emissions in California (here in the Bay Area, about 50%). In order to reduce the contributions of transportation to greenhouse gas emissions, it is critical that aggressive programs be implemented that will reduce vehicle miles traveled. VMT in California is projected to increase about 36% by the year 2020, about 49% by the year 2025, and about 63% by the year 2030. (Source: Caltrans, 2008.)

Projected increases in VMT outpace projected population increases (which is a roughly one-third increase by 2025). This is partially explained by development of residential subdivisions that generate long driving commutes because they are distant from transit and employment centers. This Draft Scoping Plan gives lip service to land use, but it does not appear to recognize the importance of a strong commitment to smart land use, in conjunction with a strong opposition to counterproductive land use (sprawl, exurban/rural developments). A high degree of emphasis must be placed on strategic land use and high density of both homes and jobs within walking distance of transit nodes, with highest densities within 1/2 mile (or about ten minutes walking) of the transit station. Failure to do so up until now explains why California traffic patterns are as dysfunctional as they are, and correcting that will require adoption of smart strategies and a moratorium on the detrimental style of development in which California has indulged to date. Land use discussion should include:

1. A strong set of design principles, including, e.g. limited/smart parking, should be articulated for compact development near transit hubs, in order to activate streets, discourage driving, and promote walking/cycling.
2. Joint analysis of housing and transportation in local jurisdictions should be carried out seriously for redevelopment and zoning plans.
3. Funding should be directly tied to the extent to which local jurisdictions have complied with the implementation of plans to place higher densities and mixed uses near transit, in accordance with the design principles.
4. Please see, e.g. Greenbelt Alliance, which has developed a clearly delineated list of design criteria that must be satisfied before it furnishes a new development project with its endorsement (URL = [http://greenbelt.org/whatwedo/prog\\_cdt\\_index.html](http://greenbelt.org/whatwedo/prog_cdt_index.html)).

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 08:14:45

No Duplicates.

## **Comment 37 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Bill

Last Name: Bogaard

Email Address: [bbogaard@cityofpasadena.net](mailto:bbogaard@cityofpasadena.net)

Affiliation:

Subject: AB 32

Comment:

July 31, 2008

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

Dear Ms. Nichols:

I am writing in regard to the AB 32 Scoping Plan, to urge the Air Resources Board strengthen the pull of local government in this effort by including land use and transportation approaches at the local level as key elements for reducing greenhouse gas emissions. Pasadena seeks to offer strong local leadership in this critical challenge of climate control, and has committed to a "Green City Action Plan" based on the U.S. Conference of Mayors' Climate Control Agreement introduced in 2005.

Rising gas prices already are causing many Californians to rethink their attitudes towards car use and the locations of their homes and jobs. Since transportation is California's single largest source of greenhouse gas emissions, and since a large part of the transportation-related carbon emissions is caused by long-distance commuting patterns based on local land use decisions, this is a major weakness of the Scoping Plan in its current draft form.

The draft says little about the relationship between changing land use patterns and reduced driving as part of the effort to reduce emissions. Setting a higher target for local government, based on land use decisions and support for non-auto based mobility, would strengthen the plan and involve local governments more seriously and more effectively in considering the climate change consequences of their actions.

The Scoping Plan could be improved by setting a higher target for reduced greenhouse gas emissions to be achieved by local government actions including land use decisions; giving local governments legal and financial tools to reduce VMT; providing incentives for local land use and transportation policies which reduce unnecessary driving, car use, and gasoline consumption; and supporting expansion of existing transit service, car-pooling, and other alternatives to single-passenger car use.

The Scoping Plan could be improved by:

- Setting a higher target for reduced greenhouse gas emissions to be achieved by local government actions including land use decisions.
- Supporting expansion of existing transit service, car-pooling, and other alternatives to single-passenger car use.
- Providing incentives for local land use and transportation policies which reduce unnecessary driving, car use, and gasoline consumption
- Giving local governments legal and financial tools to reduce VMT.

Thank you for your consideration. Please let us know in Pasadena if there is any way in which we can be helpful in this matter.

Sincerely,

BILL BOGAARD  
Mayor

cc: Members of the California Air Resources Board Climate Plan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 12:15:27

No Duplicates.

**Comment 38 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: paula

Last Name: carrell

Email Address: [chacocyn@earthlink.net](mailto:chacocyn@earthlink.net)

Affiliation:

Subject: land use planning

Comment:

We desperately need to reduce the amount of driving that the average person must do to just live life -- to get to work, to church, to the dentist and grocery shopping, etc. We need to mandate land use planning that puts residential and service sectors in close proximity AND provide clean, safe and frequent transit services. Residential sprawl is a huge part of the problem that feeds global warming.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 12:54:47

No Duplicates.

**Comment 39 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Steve  
Last Name: Schweigerdt  
Email Address: steve@ljurban.com  
Affiliation: Developer

Subject: ISR in Scoping Plan

Comment:

Please see attached letter in support of ISR inclusion in statewide air quality regs.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/45-carb\\_letter.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/45-carb_letter.pdf)

Original File Name: carb letter.pdf

Date and Time Comment Was Submitted: 2008-07-31 15:35:15

No Duplicates.

## **Comment 40 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Sande

Last Name: George

Email Address: sgeorge@stefangeorge.com

Affiliation:

Subject: APACA Comments on Land Use and Local Govt Sector

Comment:

-

July 28, 2008

PUBLIC COMMENTS FROM THE AMERICAN PLANNING ASSOCIATION CALIFORNIA CHAPTER REGARDING THE CALIFORNIA AIR RESOURCES BOARD'S DRAFT SCOPING PLAN AS IT PERTAINS TO THE LAND USE AND LOCAL GOVERNMENT SECTOR.

The American Planning Association California Chapter (APACA) is pleased to comment on the "Climate Change Draft Scoping Plan" relating to the land use and local government sector.

APACA, representing more than 6,000 local, state and regional planners working throughout California, appreciates the enormous task ahead of the state in developing strategies that will reduce GHG emissions. We have the following specific comments on the draft.

1. LAND USE SECTOR SHARE OF EMISSION REDUCTIONS: APACA was surprised to see that the scoping plan only gives local government/land use measures a 2 percent share of the needed GHG reduction. APACA has already published a list of various strategies that local planners can use now to reduce GHG measures, which is available on our website at [www.calapa.org](http://www.calapa.org). And, as the Scoping Plan draft accurately points out, many local and regional agencies have already developed additional strategies that they are implementing now. APACA believes that local governments aligned with regional GHG reduction targets will be able to reduce GHGs beyond 2 percent - we are capable of doing much better than that. The Scoping Plan should count on additional reductions in GHG emissions from land use and transportation projects to meet AB 32's 2020 emissions reduction targets. Furthermore, we believe the local government/land use sector will make an even larger contribution to achieving the ambitious 2050 targets established in Executive Order S-3-05.

2. LOCAL STRATEGIES: APACA agrees with the Scoping Plan recommendations that local governments make changes in their jurisdiction with regard to energy, waste and recycling, water and wastewater systems, community transportation and sustainable planning and community design to reduce GHG emissions. We would add microgeneration of power, community-based reduction/offset programs, agricultural preservation and forest protection policies, and programs for retrofitting existing communities, all

of which are important strategies to which local government can contribute. We recommend that these changes be made through appropriate legislation and funding, rather than the Scoping Plan's current approach of "encouraging" these changes.

3. FLEXIBILITY: Of critical importance is that any recommendations to respond to climate change be flexible, with a menu of possible options, to ensure the wide variety of local conditions can be accommodated in meeting the AB 32 carbon reduction goals and regional targets.

4. STATE ASSISTANCE WITH GHG MEASURING AND REPORTING: It is imperative that the state assist in developing measurement and tracking protocols, progress indicators, planning tools, funding and best practices to assist local governments in planning for, quantifying and reporting greenhouse gas emissions reductions.

5. REGIONAL TARGETS, PLANNING AND COORDINATION: APACA also supports setting regional targets, aligning regional transportation and housing element planning, and coordinating local and regional planning efforts to achieve maximum reductions. Additionally, COGs/MPOs/RTPAs should be required to reduce VMTs by a substantial amount in their RTP and the state must restrict the use of state funds for sprawl-inducing regional road projects when funding the RTIPs.

6. CEQA GUIDELINES: CEQA is an attractive tool because it is a common process implemented every day by jurisdictions throughout the state on many projects. However, it is not a very efficient or effective substitute for policy and related funding strategies that might accomplish actual and meaningful emissions reductions. APACA suggests that, as part of the Guidelines revisions now underway pursuant to SB 97, the Resources Agency and OPR consult with CARB and California Energy Commission to provide acceptable methodologies for climate change analysis, significance thresholds, and mitigation measures. The Guidelines should recognize that CEQA climate change analysis consists of two parts:

impacts of the project on GHG emissions, and impacts of climate change on the project (e.g., increased flooding, reduced water supply). The Guidelines revision, or an accompanying technical paper, should identify "best practices" for the following topics:

- Methods for quantifying GHG emissions, and projects for which qualitative analysis is sufficient.
- Defining baseline conditions and significance thresholds (we don't believe that a statewide threshold of significance adopted by regulation as opposed to statute will be of much assistance as each region has widely differing conditions and such a regulation will not protect against a fair argument challenge).
- Acceptable mitigation measures for energy conservation and micogeneration, alternative energy sources, trip reduction and other topics.
- Criteria for streamlining project-level climate change analysis, e.g., through tiering, finding a project "within the scope" of a carbon reduction program, or use of CEQA's "partial exemption" provisions in S. 21083.3.

7. SCOPE OF CEQA: Once the local and regional GHG emission reduction strategies and planning are in place, project CEQA documents should be authorized to rely on plan-level GHG reduction strategies. In addition:

- The Legislature should require CEQA climate change analysis only for large projects, and exempt small and infill projects from this

requirement. For instance, limiting the requirement for climate change analysis to projects of statewide, regional, or area wide significance should be used as a starting point for the definition. Smaller projects would be required to meet the provisions of whatever overall plan or ordinances govern them, such as stricter building codes, water savings, etc.

- General plans, general plan updates, regional transportation plans, and specific plans should also be included in the definition of projects requiring climate change analysis.
- CEQA documents for projects that qualify for LEED or LEED-ND certification, or equivalent certification, if developed by the State, should not be required to include a climate change analysis.
- CEQA documents prepared for local general plans that are consistent with regional climate change strategies should focus on local implementation measures and incorporate by reference the regional climate change CEQA analysis.
- Project-level CEQA documents need not provide additional project-level climate change analysis or mitigation if the project is within the scope of applicable regional and local plans that include climate change strategies and that have certified program EIRs; is consistent with applicable regional and local climate change strategies included in the regional or local plans for which an EIR was certified; and incorporates applicable project-level mitigation measures from the certified regional and local plan EIRs.

8. VMT REDUCTION FEASIBILITY: The state must radically change course on transportation financing. California has to substantially increase commitment to transit funding, requiring some mandatory local funding level for transit to be provided in the RTPs and RTIPs as well as bicycle facility funding, if the VMT reductions are to be realized.

9. LOCAL FUNDING: APACA believes that the state will also need to provide a grant or other funding program to support local government planning efforts for general plans and climate action plans, including regular GHG inventories to measure progress and quantification of carbon reduction from municipal programs to aid in prioritizing actions. It took very little grant money per jurisdiction from the BAAQMD, for example, to entice nearly every Bay Area city to start preparing a CAP or general plan update with GHG strategies. Strategies should also be developed to continue efforts to "unfiscalize" land use.

10. INFILL REWARDS: Part of these strategies should include targeted incentives to make infill development substantially easier to build than low density greenfield development, including streamlined CEQA requirements and fee mechanisms that reflect the true GHG emission costs of such projects.

APACA appreciates this opportunity to comment.

Sincerely,

Pete Parkinson, AICP  
APACA Vice President, Policy and Legislation

cc: Governor  
Office of Planning and Research

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/46-ab\\_32\\_scoping\\_plan\\_comments\\_7\\_08\\_pp\\_final\\_7\\_31\\_08.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/46-ab_32_scoping_plan_comments_7_08_pp_final_7_31_08.doc)

Original File Name: AB 32 Scoping Plan Comments 7 08 PP FINAL 7 31 08.doc

Date and Time Comment Was Submitted: 2008-07-31 17:47:53

No Duplicates.

## **Comment 41 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Karen

Last Name: McDonough

Email Address: karen.mcdonough@sanjoseca.gov

Affiliation:

Subject: City of San Jose Comment

Comment:

The local government section emphasizes the partnership necessary between local and regional government agencies in achieving California's greenhouse gas reduction goals, but the only target attached to this section is a transportation measure, which understates the contribution that local governments can bring to reducing greenhouse gas emissions. At the very least, cities that are willing to go further --to commit to higher densities near transit nodes and downtowns-- should be encouraged to do so by being offered financial incentives to go the extra mile.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 01:19:10

No Duplicates.

**Comment 42 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Art

Last Name: Madrid

Email Address: amadrid@cox.net

Affiliation: City of La Mesa

Subject: Giving Local Government a Larger Role in Reducing Greenhouse Gas Emissions

Comment:

Please see attached pdf letter. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/48-ab32.pdf>

Original File Name: AB32.pdf

Date and Time Comment Was Submitted: 2008-08-01 09:13:39

No Duplicates.

## **Comment 43 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Garrett

Last Name: Fitzgerald

Email Address: gfitzgerald@oaklandnet.com

Affiliation: City of Oakland

Subject: Comments on Local Government Sector

Comment:

Below are comments from the City of Oakland specific to the Local Government section of the Draft Scoping Plan. These comments were also included in the City of Oakland's letter submitted to the General Comments section of this website.

### **1. Indirect Source Rules for New Development are Needed**

Page 38

We strongly encourage ARB to impose regional indirect source rules for new residential and commercial development to help foster new development throughout the state with relatively low embodied emissions impacts. As we continue to grow as a state, we must create and commit to development patterns that minimize future GHG emissions by maximizing use of existing transit and services infrastructure.

### **2. More Emphasis Needed on Land Use & Transportation Demand**

While recommended measures associated with improving vehicle fuel efficiency and reducing the carbon intensity of transportation fuels are admirable, more emphasis should be placed in the Plan on fostering reductions in vehicle miles traveled. The State should seek to actively work with local governments to foster low-carbon development, and incorporate additional mechanisms into the Plan to reward development concentrated around existing transit and service infrastructure. Targets associated with regional and local land use and transportation could be increased significantly if ARB is willing to invest sufficient resources in assisting local and regional agencies with accomplishing better planning and implementing the transportation and related infrastructure necessary to enable low-carbon development.

Additionally, waste reduction strategies (referenced in comment # 2 above) such as reducing and reusing materials, and repairing, refurbishing, and rehabilitating existing products and buildings to retain their form and function can reduce emissions from transportation of input feedstocks and finished goods.

### **3. Distinguish Between Local Government and Regional Land Use Targets**

The Plan should more clearly distinguish between proposed emissions reduction targets associated with regional land use and transportation planning and those associated with action by individual local governments.

### **4. Clarify Role of and Empower Regional Planning Efforts**

The Plan encourages more regional planning involving local

governments to help reduce transportation emissions, and suggests that "ARB, along with other State agencies, will work with regional and local governments to develop targets to reduce greenhouse gas emissions on a regional basis." The Plan should offer more detail on how these regional collaborative planning processes would be convened. The State should provide resources to enable all parties to engage substantively in these planning efforts. The State should also empower local governments with a suite of additional policy tools to foster low-carbon development in their communities, enabling regional partners to select the best tools for achieving their low-carbon goals.

5. Encourage Public Transit and Other Transportation Alternatives  
The Plan should specifically target increasing implementation of transit-oriented development, public transit infrastructure, and use of federal transportation dollars for lowest carbon means of achieving given transportation goals. Significant investment in enabling public transit infrastructure will be needed to achieve our long term GHG emissions reduction goals.

6. Apply Aggressive Standards for Low Carbon Development  
While emissions reduction targets might vary by region for total regional GHG emissions, aggressive statewide targets for emissions associated with new development should be adopted. The State should support urban infill development and relatively reward low-carbon development on a statewide basis through a mix of policy tools and incentives.

#### 7. Reward Local Actions That Don't Qualify as Offsets

Page 44

ARB should consider opportunities to encourage and reward local governments for proactive policy and programmatic actions that further reduce GHG emissions either locally or globally, but may not be eligible as saleable offsets under traditional offset crediting definitions. For example, local governments should be rewarded for land use plans and development projects that meet stringent low-carbon criteria (e.g., a metric calculated based on proximity to transit and services), adopting local building energy codes requiring increased levels of energy efficiency, and implementing local waste collection and management programs that increase waste diversion beyond state targets, reducing landfill methane and upstream energy use.

#### 8. Promote Suite of Available Local Government Assistance

Page 31

Local governments should be directed to the wide range of assistance available to help local governments foster reductions in GHG emissions. The phrase "such as those developed by the Institute for Local Government's California Climate Action Network" should be replaced with "such as those featured at <insert ARB web link>" where this ARB web link refers to a list of resources including but not limited to the Institute's information. Resources provided by ICLEI, the Local Government Commission, US EPA and others are equally valuable to local governments.

#### 9. Acknowledge Leadership of Local Governments

Page 1

A number of local governments in California (including the City of Oakland) made significant progress during the 1990's in assessing GHG emissions in their communities, developing emissions reduction plans and taking a variety of actions to reduce emissions. The leadership of these local governments should be acknowledged in

the plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 10:37:55

No Duplicates.

**Comment 44 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Bruce

Last Name: Fukuji

Email Address: bruce@fukuji.com

Affiliation:

Subject: scoping plan falls short on land use and transportation contribution

Comment:

Please review attached comments

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/50-arb\\_sp\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/50-arb_sp_comments.pdf)

Original File Name: ARB SP comments.pdf

Date and Time Comment Was Submitted: 2008-08-01 10:54:30

No Duplicates.

## **Comment 45 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Yvette

Last Name: Rincon

Email Address: [yrincon@cityofsacramento.org](mailto:yrincon@cityofsacramento.org)

Affiliation: City of Sacramento

Subject: City of Sacramento

Comment:

### **City of Sacramento Comments Regarding Land Use and Regional Transit**

1. Regional Transit must be a priority at the State level. We agree with ARB's emphasis of the concept of making the connection between transportation and land use and regional planning such as the blueprint. The City of Sacramento has already embraced these concepts by participating in the SACOG blueprint process and adopting a general plan that is consistent with the Blueprint. ARB should reward cities who have taken these steps. However, ARB must recognize in the scoping plan that in order for cities to have effective land use plans connected to transportation, the State needs to make regional transit funding a priority. There must be viable transportation alternatives including bus and light rail.

2. Meaningful guidance is needed from the State regarding use of CEQA as it relates to climate control. ARB makes several references to utilizing the CEQA process to identify potential impacts and mitigation measures. However, in order for cities to do this the ARB and the OPR need to provide meaningful guidance to local jurisdictions, including: how to set thresholds of significance; what constitutes a de minimis impact; developing a consistent statewide methodology and technological resources that local government can use to quantify not only local baseline emission levels, but also how to quantify mitigation for various types of projects.

3. Heavy/Medium-Duty Vehicles. We would be interested in regulations addressing the fuel efficiency and hybridization of heavy and medium-duty trucks that improve fuel efficiency and reduce aerodynamic drag and rolling resistance, provided the regulations are cost effective and are phased in over time.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 11:54:08

No Duplicates.



## **Comment 46 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Yvette

Last Name: Rincon

Email Address: [yrincon@cityofsacramento.org](mailto:yrincon@cityofsacramento.org)

Affiliation: City of Sacramento

Subject: City of Sacramento

Comment:

### Comments Regarding Local Government Actions and Regional Targets

1. Voluntary vs. Mandated Approach. It is unclear what ARB's long term intent is in terms of mandatory vs. voluntary measures. In one paragraph ARB encourages local and regional governments to develop targets to reduce greenhouse gas (GHG) emissions while in another paragraph ARB states that it will track and account for the local government actions to reduce GHG emissions. Will cities be required to track and report GHG emissions and later be required to meet specific State mandated GHG reductions? ARB should be clear about its intent for regulations and requirements for cities in the short and long-term.

2. Use of Incentives. ARB should employ an incentives based approach for cities to reduce greenhouse gas emissions. Providing funding to cities to develop regional targets would provide great incentive for cities to do so. Similar to Proposition 1C in which the State rewarded smart growth projects, ARB should grant funding to cities who develop GHG reduction targets and have a climate change plan to reach their GHG reduction targets.

3. The City generally supports tax credits, grants, and loans and other incentives to assist cities, businesses, and local agencies that invest in energy efficient equipment, technology, and programs. However, any carbon fees that ARB is considering must maximize economic benefits and minimize economic harm. That said, ARB should set aside a portion of the revenue from the carbon fees to incentivize local government by:

- a. Providing sustainable community grants to local governments
- b. Funding county-wide and city-wide greenhouse gas inventory efforts and annual reporting
- c. Granting funds to local jurisdictions based on their efforts to move their community towards sustainable operations

4. Distinguish between municipal targets and community targets. In general, we agree with the regional approach taken by ARB to develop regional targets to reduce greenhouse gas emissions, however, we would ask that ARB distinguish between municipal targets and community targets. Recognizing that cities have direct control over municipal facilities and operations and less control over the community use of energy and transit choices.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 11:55:56

No Duplicates.

## **Comment 47 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Zheng

Last Name: Liang

Email Address: lawrence.liang@verizon.net

Affiliation: 909-931-1267

Subject: Subject: Livestock is a marjor reason of global warming

Comment:

Comment:

It is great to know that you as a govenment officials take the initiate to act on this issue of global warming, I was encouraged by you and appreciated your great effort. That's the government that we people need.

After went through your plan, I have found out a big loop hole in the whole act, that is you missed the big picture of the whole issue: the main reason to cause the global warming. If you check all the publication from Nasa Website, Many sicientist have already prooved that the most contribution of the global warming is from live stock industry, meat eating of us is the real reason behind it. Only if we know about the truth, then we can find the right way to solve the problems. Vegetarianism is the best way to stop the global warming.

According to Senior UN Food and Agriculture Organization (FAO) official Henning Steinfeld, livestock are one of the most significant contributors to today's most serious environmental problems and urgent action is required to remedy the situation.? The reasons include:

1. The livestock sector generates more greenhouse gas emissions as measured in CO2 equivalent to 18 percent than transport. It is also a major source of land and water degradation.

2. Livestock generates 65 percent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure. And it accounts for respectively 37 percent of all human-induced methane (23 times as warming as CO2), which is largely produced by the digestive system of ruminants, and 64 percent of ammonia, which contributes significantly to acid rain.

3. livestock now use 30 percent of the earth entire land surface, mostly permanent pasture but also including 33 percent of the global arable land used to producing feed for livestock, the report notes. As forests are cleared to create new pastures, it is a major driver of deforestation, especially in Latin America

where, for example, some 70 percent of former forests in the Amazon have been turned over to grazing.

4. The livestock business is among the most damaging sectors to the earth increasingly scarce water resources, contributing among other things to water pollution, eutrophication and the degeneration of coral reefs. The major polluting agents are animal wastes, antibiotics and hormones, chemicals from tanneries, fertilizers and the pesticides used to spray feed crops. Widespread overgrazing disturbs water cycles, reducing replenishment of above and below ground water resources. Significant amounts of water are withdrawn for the production of feed.

For more detail information about livestock, please click the below link: [www.fao.org/newsroom/en/news/2006/1000448](http://www.fao.org/newsroom/en/news/2006/1000448).

Livestock sector is a major greenhouse gas source. Please do not ignore it. Only vegetarianism can solve the Crisis. Otherwise, by 2012, the world is going to the point of no return. Human species is going to vanish from the earth including all other living beings. So please add this most important part into your sector or as a general background of this act.

Thanks for your understanding and acceptance of our suggestions

Zheng Liang

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 12:35:38

No Duplicates.

**Comment 48 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Stephanie

Last Name: Taylor

Email Address: [staylor@libertyhill.org](mailto:staylor@libertyhill.org)

Affiliation: GREEN LA Coalition

Subject: Scoping Plan

Comment:

On behalf of the undersigned organizations, members of GREEN LA's Transportation Work Group or its Urban Ecosystems Work Group, we write to urge you to elevate the priority of local government actions to reduce vehicle miles traveled (VMT) as a key strategy for reducing greenhouse gas emissions.

Please see the attached letter containing some GREEN LA member endorsements (more endorsements to come).

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/54-ab\\_32\\_green\\_la.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/54-ab_32_green_la.pdf)

Original File Name: ab 32 Green LA.pdf

Date and Time Comment Was Submitted: 2008-08-01 13:57:26

No Duplicates.

## **Comment 49 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: David

Last Name: Schonbrunn

Email Address: David@Schonbrunn.org

Affiliation: TRANSDEF

Subject: Regional Targets/ The Role of CMAs

Comment:

The Transportation Solutions Defense and Education Fund, TRANSDEF, has actively advocated for the regional planning of land use, transportation and air quality for the past 15 years. With mobile sources being the biggest emissions category in the State's GHG inventory, we recognize that modifying the land use context in which transportation occurs is absolutely crucial to the success of the Scoping Plan. But the Plan has little to offer in this area.

The Draft Scoping Plan fails to acknowledge how deeply entrenched in Business As Usual the system of General Plans, Congestion Management Plans and Regional Transportation Plans is. These plans have massive momentum, which results in ever-increasing VMT.

Changing the direction of land use and transportation planning is a very major task. While there are bright spots, such as SACOG's Blueprint process, the coordination of transportation and land use will only occur if the State steps in with mandates.

Having closely observed the Bay Area's regional transportation planning process for the past 15 years, it is abundantly clear that "recommending" the setting of GHG emissions reduction targets will not work. Local governments' satisfaction with what has worked in the past has resulted in enormous inertia. Even with all the scientific evidence of global warming available in 2008, an agency like MTC has proven itself utterly resistant to reconsidering its past commitments to transportation projects, despite the obvious negative impacts of those projects on GHGs.

Unless CARB mandates regional targets, agencies like MTC will remain deeply stuck in Business As Usual, incapable of making the necessary and difficult decisions to reduce emissions, such as cancelling politically popular highway programs that increase VMT and GHGs. As evidence of its stuckness, MTC refused TRANSDEF's request to include in its RTP EIR a Maximum Emissions Reduction Alternative, which proposed a lower-carbon transportation system that would require reprogramming resources previously committed.

TRANSDEF strongly supports regional targets, and urges CARB to mandate a specific reduction target for each region, based on a per capita reduction for existing residents and a higher per capita reduction for future residents (who would be expected to adopt a lower-carbon lifestyle as a result of improved community design). We believe a mandate is needed to create the political space in which fresh thinking can occur. Our experience is that

local government planning moves in an evolutionary and incremental manner--an arc that does not work when a profound challenge like global warming requires drastic change. With mandated regional targets, the local jurisdictions within each region will then be encouraged to negotiate with each other to create a consensus plan to achieve their regional target in the most mutually acceptable fashion possible. This kind of process will encourage the kind of 'blank sheet of paper' thinking that is needed when coming up with comprehensive creative solutions.

TRANSDEF urges CARB to raise with the Legislature the issue of the future role for Congestion Management Agencies. These legislatively created agencies are mandated to reduce congestion. They have become the institutional driving force for highway widening projects within California. These projects and the development they facilitate, however, are central to the State's trend of ever-increasing VMT. In a letter last year to MTC, Bay Area CMAs declared that climate change should not be considered in regional transportation planning. The subtext was that they should be left alone to work on their highway projects. CMAs as institutions are inherently hostile to assisting with the implementation of AB 32. They do not see themselves as having a mandate to "partner with regional planning agencies to create a sustainable vision for the future that accommodates population growth in a carbon-efficient way." (Scoping Plan, page 32). We believe that legislatively changing the mission of CMAs will be crucial in shifting the politics of regional transportation planning agencies to support reducing mobile source GHGs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 14:24:46

No Duplicates.

## **Comment 50 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Karen

Last Name: Del Compare

Email Address: [kdcyew@excite.com](mailto:kdcyew@excite.com)

Affiliation:

Subject: Planning

Comment:

Please consider having urban planners be licensed by the State of California. In this way, land use patterns that decrease greenhouse gas emissions will be taught to planners, planners can be tested on the subject, and ongoing professional education can occur as new technologies/methods develop. On page C-66 of the appendices it says, "In order to ensure that building designers understand these concepts, it may be necessary to require passive solar design as part of architectural programs, exams, and ongoing professional education credits." Yet for land use, there are no similar standards. I have recently seen many decisions been made by local government which will likely increase GHG emissions and no one is held accountable for this. A licensing program for planners could be a first step.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 15:56:38

No Duplicates.

## **Comment 51 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Stuart

Last Name: Cohen

Email Address: stuart@transcoalition.org

Affiliation: Transportation and Land Use Coalition

Subject: Land Use/Regional Targets Recommendations

Comment:

### COMMENTS ON AB 32 DRAFT SCOPING PLAN

July 31, 2008

California Air Resources Board Members and Staff:

The Transportation and Land Use Coalition, a partnership working for World Class Transit and walkable communities in the Bay Area and beyond, applauds the Air Resources Board's comprehensive and ambitious draft AB 32 scoping plan. For many sectors it will propel California into a leadership position on both the national and international stage.

Unfortunately the one place that it truly falls short is on the reduction targets for "Local Government Actions and Regional Targets". The draft scoping plan calls for only 2 million metric tons (MMT) of GHG reductions from regional targets. In 2006, California's Climate Action Team (CAT) predicted the State to eliminate 9 MMT from this sector from "blueprint" programs alone.

The 2 MMT is equivalent of a 2% decrease in per capita VMT by 2020. If the number was calculated simply on the new increment of growth that will take place between 2010 and 2020 - in other words existing residents will continue to drive as much as they do today - then this decrease may be a reasonable estimate.

However, there are tremendous potential efficiencies to be gained from transportation pricing, new transportation infrastructure, and education and incentive programs. Some of these programs are acknowledged in the scoping plan and are listed as "under evaluation". These include the Indirect Source Rule, Pay-As-You-Drive Insurance, Congestion Pricing, and Education/Incentive Programs. The scoping plan acknowledges that these could bring up to another 4 MMT.

In the scoping plan appendices there are a host of additional programs that are discussed and essentially we believe these should all be undertaken.

We encourage CARB to make the following revisions to the Scoping Plan:

CARB should set a higher reduction target for "regional targets" based on VMT (Vehicle Miles Traveled) reductions. We are working with ClimatePlan members and national experts to determine the potential reductions and will have that analysis to you

shortly.

&#61607; Transportation efficiency measures should not be separated out from these "regional targets". Since multiple programs are likely to be introduced at the same time, it will be very difficult to know how much benefit to assess each strategy. This is congruent with a "regional blueprint" approach that simultaneously considers land use scenarios along with transportation systems, pricing and operational scenarios.

&#61607; Regional targets should be distinct from local government targets. Local government actions and regional targets are currently combined. Any local government actions that can reduce VMT, such as programs to increase transit are carpooling use, or improved community design, should be captured under the regional targets section. There is an obvious danger of double counting, or simply creating burdensome and inefficient measurement protocols by combining these strategies together. It is possible that some of the other local government strategies can be counted separately, such as recycling or community energy, but it seems that in all of these areas the issue of double counting remains.

&#61607; CARB should allocate transportation GHG targets at the regional scale and set interim milestones to gauge whether each region is on track to achieve the targets

&#61607; The plan should make it a top priority to invest in and sustain public transportation and programs to improve transportation efficiency and reduce congestion. While CARB cannot do that through the state budget process there may be ways to enable the state or regions to raise additional funds for climate friendly transportation programs from carbon-based revenue.

&#61607; Cities, counties and regions should be given incentives to conserve forests and working landscapes that sequester carbon, provide local food, and reduce wildfire hazard.

&#61607; Municipalities should be given additional financial and technical resources to develop climate-friendly specific plans, general plans, etc.

There is agreement amongst a broad range of stakeholders that we need to move to a smart land use paradigm as California adds another 20 million new residents or more by 2050. There is also a growing movement towards regional cooperation, with all major regions in the state undertaking blueprint planning over the last seven years

While all stakeholders might not agree on the strategies, that should not make CARB timid about addressing this in the scoping plan. We believe it is possible to have flexible implementation strategies that can be adapted by each region, and still meet much higher reduction targets than were sent out by the draft scoping plan.

There is, understandably, concern about how reductions targets in this sector can be enforced. In other words, what would CARB do if a region had a blueprint and was implementing a variety of VMT reduction strategies but was not meeting its GHG/VMT milestones by 2015, 2017, or some other date?

One possible direction is to rely on a few scalable implementation

mechanisms. These mechanisms would provide valuable resources to regions as they work to reduce VMT, promote walkable communities, and protect valuable farmland and open space. They could include

- An Indirect Source Rule that promotes lower-carbon community design and provides financing for planning and projects that are climate-friendly.
- public goods charges on gasoline to fund alternative transportation,
- container fees to fund low-emission goods movement, or
- congestion pricing as a way to raise revenue for transportation alternatives while helping manage demand.

These tools would essentially represent additions to the very limited toolbox currently available to cities, counties and regions.

Some of these measures could initially be voluntary or set at modest levels. With others, such as road-pricing mechanisms, the state could simply provide statutory authority that would allow regions to choose whether and how to implement these programs.

Then, CARB would measure VMT at certain milestone years, and if a region is not meeting these milestones then some of these tools could be strengthened or "scaled up" in order to achieve greater GHG reductions. For example, the GHG per capita threshold for the Indirect Source Rule in that region could be reduced or the container fee increased to fund additional goods movement.

Since all of these programs utilize efficient market mechanisms and pricing signals -- they put a price on high-carbon activities and use that funding to incentivize low-carbon alternatives -- there should be strong economic, social and public health benefits from their implementation. These benefits would include significant traffic congestion reduction, lower overall transportation costs as more people gain access to affordable alternatives, cleaner and faster goods movement, reduced particulate matter in local communities, and more.

Each of these programs should contain measures to ensure significant benefits accrue to low-income communities, and that an equity analysis is conducted to ensure the benefits to these communities are at least as great as any cost.

We must do everything possible to prevent global warming's most disastrous consequences and costs, and a stronger land use section would not only help us achieve the 2020 reduction targets, but set us on a more clear trajectory towards reducing emissions 80% by 2050. We look forward to working with you as you finalize the scoping plan and develop an implementation plan that can improve the quality-of-life for all Californians while setting an extraordinary model for the world.

BY: Transportation and Land Use Coalition  
Contact: Stuart Cohen, Executive Director  
510-740-3150 [Stuart@transcoalition.org](mailto:Stuart@transcoalition.org)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 16:00:51

No Duplicates.

## **Comment 52 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Steven

Last Name: Goetz

Email Address: [sgoet@cd.cccounty.us](mailto:sgoet@cd.cccounty.us)

Affiliation: Contra Costa County

Subject: Land Use and Local Government

Comment:

The proposed Regional Targets should be supported by the State Environmental Goals and Policy Report (EGPR) and the 5-year infrastructure plan required by State law, Chapter 1016 - Statutes of 2002. This coordination is mentioned in Appendix C, but apparently such coordination is not acknowledged at this point as appropriate for incorporation into the Scoping Plan. The recommendations of Appendix C regarding development and maintenance of the EGPR and a 5-year infrastructure plan for the State should be pulled into the Scoping Plan. Such coordination of planning efforts was also listed in the report of the Land Use Subgroup of the Climate Action Team (LUSCAT) as an essential principle to the long-term vision for land use planning in California.

The Scoping Plan on page 32 indicates that local governments have the ability to directly influence both the siting and design of new residential and commercial developments in a way that reduces greenhouse gases associated with energy, water, waste, and vehicle travel. The Scoping Plan should also acknowledge that single-purpose entities such as school and college districts operate independent of cities and counties under state law. These independent entities construct facilities that create major destinations for a community and can significantly affect green house gasses associated with energy, water, waste, and vehicle travel. The State can assist local government in meeting regional targets by ensuring that laws and regulations that support special districts are coordinated with the actions of local government.

Substantial experience with development of school facilities under existing State law and related regulations/programs warrants consideration the following changes, in consultation with affected stakeholders:

- Revision to the Government Code Section 65302 to include sites for school facilities as a required component of the land use element of General Plans.
- Evaluation of state school facility siting standards and regulations to ensure siting of facilities in a GHG efficient manner (e.g. protect greenfields, minimize transportation requirements, and preserve habitat and natural resources).
- Adoption of siting criteria by the State Allocation Board as a prerequisite for grant funding or adoption of the criteria as a state requirement for any facility funding.

Please refer to the comments provided under the "State Government" sector for relevant State actions. These State actions will help

provide the state leadership and funding to support the local government actions recommended by the Scoping Plan.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 16:19:52

No Duplicates.

**Comment 53 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: David

Last Name: Runsten

Email Address: dave@caff.org

Affiliation: Community Alliance with Family Farmers

Subject: Comments on AB 32 Scoping Plan

Comment:

Attached are comments from the Community Alliance with Family Farmers. These comments have been posted to the sections on Agriculture and Land Use and Local Government.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/59-ab\\_32\\_scoping\\_plan--caff\\_ltr\\_8-1-08.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/59-ab_32_scoping_plan--caff_ltr_8-1-08.doc)

Original File Name: ab 32 scoping plan--caff ltr 8-1-08.doc

Date and Time Comment Was Submitted: 2008-08-01 16:37:06

No Duplicates.

## **Comment 54 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Brendan

Last Name: Reed

Email Address: breed@ci.chula-vista.ca.us

Affiliation:

Subject: Local Governments & Carbon Reductions

Comment:

To ensure that AB32 meets its carbon reduction targets, local governments need to be actively and directly involved in the implementation process. Local jurisdictions are able to provide direct carbon reductions through a variety of mechanisms including their land use authority, CEQA review process and numerous municipal policies, codes and programs. In response to the Draft Scoping Plan, the City of Chula Vista's staff has outlined a number of comments and recommendations (attached) which will help empower local governments and ensure their participation as a value added partner in AB32's successful implementation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/60-ab32\\_draft\\_plan\\_comments\\_final\\_signed.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/60-ab32_draft_plan_comments_final_signed.pdf)

Original File Name: AB32 Draft Plan\_Comments\_FINAL\_Signed.pdf

Date and Time Comment Was Submitted: 2008-08-01 16:49:52

No Duplicates.

## Comment 55 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.

First Name: Keith

Last Name: Roberts

Email Address: kroberts@cityofsacramento.org

Affiliation:

Subject: Land Use and Local Government

Comment:

Land Use and Local Government

1. General Comment: All City and County governments over a certain size range should report their internal operations greenhouse gas emissions to the California Climate Action Registry. Perhaps on a schedule based on population; where:

- >= 500,000 report for 2011
- >= 250,000 report for 2012
- Etc to a minimum of 100,000 or so

Please note other comments that indicate that cash-strapped cities may have a difficult time funding this process. In Sacramento's case; the time and resources required to do an annual CCAR inventory are approximately 0.25 FTE AND \$15,000 per year.

2. Page 31, Local Government Actions: There are many actions that local governments can take to assist in meeting AB32, many of these actions are identified in the plan. To maximize buy-in from local governments, a sustainable funding mechanism needs to be developed. See additional comments on funding.

3. Page 33, Recommended Regional Targets: For regional target concept to be deployed, every County in the State needs to have a countywide greenhouse gas inventory completed, preferably using a consistent method and using a consistent baseline year. Ideally, each incorporated City within the County should also have an inventory completed. In addition, several metrics need to be developed in order to understand, what each City and County might be able to do to address greenhouse gas reduction. For example:

- Growth patterns between now and 2020 (built out or still growing?; 1990 is irrelevant)
- Energy efficiency installed in the past (i.e. to understand future capability)
- Energy use per sf per year for different types of buildings (i.e. to gage potential improvements)
- Metric tons per person per year
- Amount of money spent each year on NEW roads vs MAINTENANCE of roads, new light rail and buses, bike lane miles added, etc.

4. Page 33, Recommended Regional Targets: Please provide more information on how regional targets will be developed.

- Please clarify baseline years that are to be used; 1990 data is not widely available; City of Sacramento is working with County and 6 other Cities to determine baseline for calendar year 2005
- IF 1990 baseline is used, consider regional population growth

between 1990 and 2020 as a factor when calculating targets

- Past efforts that have been implemented

5. Page 33, Recommended Regional Targets: Please discuss the consequences of not meeting the regional targets. The AB32 process has consistently been portrayed as voluntary for local governments; however there must be some types of carrots and sticks that will be employed to assist. Please see additional comments on funding for potential carrots and sticks.

6. Page 41: Consider recommending to local governments that they include VOLUNTARY carbon surcharges on services that they provide to:

- Provide source of new revenue
- Gage residents acceptance of addressing climate change in their community
- Some examples might include:
- Water Services: Water pumping is approximately 25% of the City of Sacramento's municipal operations carbon footprint. Less than a 2% surcharge on typical City water bill would allow the City to purchase renewable power for all City potable, sanitary and storm treatment and pumping.
- Solid Waste Services: Solid Waste Operations (fuel, electricity, etc.) and methane generation at landfill accounts for approximately 10% of City of Sacramento's municipal operations carbon footprint. Less than a 10% surcharge on typical City solid waste bill would allow the City to purchase renewable power for all City solid waste operations and to plant additional urban forest to offset fuel used by trucks and fugitive methane generation from landfill.
- Room/ Site Rental Fees: Libraries and Community Centers can offer carbon neutral room rentals
- Convention Center Rental Fees: Convention Centers can offer carbon neutral events.

7. Page 41 and 47: For carbon fees that are collected from imports into California, consider:

- Providing sustainable community grants to local governments
- Funding county-wide and city-wide greenhouse gas inventory efforts and annual reporting
- Granting funds to local jurisdictions based on their efforts to move their community towards sustainable operations (see additional comments on developing a sustainability matrix).

8. Page 47: under "Incentives To Local Governments": For cities to assist in meeting the goals of AB32, a sustainable funding mechanism needs to be developed. Below are some concepts that might be considered.

- New Construction: Recommend using PUC or POU collected Public Goods Charge (PGC) to provide incentives to local governments to ensure that energy efficient construction that exceeds Title 24 requirements is achieved; perhaps \$0.10 per square foot for minimum compliance of Title 24 + 15%, \$0.15 per square foot for 20%, \$0.25 per square foot for 30%. Residential incentives might be per unit instead of per square foot.
  - Oversight needed (perhaps) by State to ensure validity of Title 24 calculations and inspections.
- Point Of Sale (POS) Ordinances: Energy efficiency targets for existing building stock identified on page 21 indicate that Sacramento's share of the requested improvements, on the average, will require EVERY BUILDING IN THE CITY OF SACRAMENTO to be 10% to 12% more efficient than current. Recommend using PUC or POU

collected Public Goods Charge (PGC) to fund enforcement of point of sale ordinances for residential and commercial construction; perhaps on a cost per square foot level. Residential incentives might be per unit instead of per square foot.

o Implement a statewide public relations campaign to identify advantages of POS ordinances to stakeholders, including realtors and BIA.

o BIA might be an ally if fees are NOT collected from new development.

- Solar Water Heating and Solar Photovoltaic: Solar targets identified on page 21 are daunting for City of Sacramento, as an example (i.e. 2,500 solar water heaters and 13,000 solar photovoltaic systems); recommend using PUC or POU collected Public Goods Charge (PGC) to provide incentives to local governments to assist in achieving goals. Incentive to local governments should be based on annual solar fraction installed, say \$100 per kW.

- Carbon Neutral Land-Use Ordinance (CNLO): Improving the efficiency of new and existing building stock addresses a portion of the workload of local governments; another portion of the workload that affects energy usage is land use planning and transportation options that are available to the community.

o See Attachment A

9. Page 47, Incentives to Local Governments: Property Taxes, Feebates and Land Use: It is somehow necessary to defiscalize land use so that cities are not joyous when big boxes and auto malls come to town. It may be possible to incent local governments to enforce a CNLO by applying a feebate type concept to property tax DISBURSEMENTS, not collections. For example, a project that is built that STRONGLY meets the intent of a CNLO might cause 120% of the normal property tax disbursements to be made to the local jurisdiction from the County; a project that is built that LIGHTLY meets the intent of a CNLO might cause 80% of the normal property tax disbursements.

- This could have a cascade effect in that the local jurisdiction could then provide incentives to project developers for projects that heavily meet the CNLO AND/OR could charge higher fees for projects that lightly meet the CNLO.

- Feebate concept might also be applied to property tax COLLECTIONS and thus motivate project developers to meet AB32, but this would have to be coordinated with Proposition 13.

- The problem with the use of feebates is that many projects need to NOT comply (or lightly comply) to an action so that they can be charged higher fees in order for other projects to receive a rebate for heavily complying with the action.

- Additional problem with feebates is that somebody has to determine which projects heavily comply or lightly comply with CNLO... perhaps IPLACE3S might be used for this determination?

10. Page 47, Incentives to Local Governments: Sales Taxes, Feebates, and Land Use: This concept is similar to Property Taxes and Feebates concept identified above, except that by applying to 2 sources of a local jurisdictions income (Property Taxes and Sales Taxes), the overall unit rate for each would be lower.

11. Page 47, Incentives to Local Governments: Property Taxes, Sales Taxes, Feebates and General Sustainability: The concept of sustainability goes far beyond land use decisions. For property tax disbursements and for sales tax disbursements that are not subject to land-use feebates, consider developing a matrix of general sustainability issues (landfill diversion, per capita waste reduction improvements, meeting communitywide greenhouse gas

reduction goals, water use efficiency improvements, etc.) and use the results of the matrix annually to adjust property tax disbursements to local jurisdictions... higher than normal if they do well and lower than normal if they don't do well:

- Potential program should be designed so that local jurisdictions would tend to work with each other and not against each other (perhaps use regional information instead of jurisdictional information?).
- Potential program should start out with a range of 99% to 101% of normal property tax disbursements to be used as a shake-down period and increase over time to say 95% to 105% (or whatever is necessary).
  - i. Ideally, the State could find additional funds (e.g. fees from carbon imports) to supplement sales tax disbursements to Cities such that all cities are made whole and that initial range of disbursements starts at 100% to 102% instead of 99% to 101%

12. Page 47, Incentives to Local Governments: Local governments, as tax exempt corporations, have to resort to convoluted lease-to-own or Power Purchase Agreements in order to install solar energy systems cost effectively. Solar photovoltaic systems are NOT rocket science and our building maintenance folks are eager to install solar project, could do a wonderful job at installing, would learn and become more aware of the issues, BUT THEY CAN'T DO THE WORK AS IS BECAUSE FEDERAL TAX CREDITS DRIVE THE COST

- Consider working with Federal government to allow tax exempt corporations (like Cities) to auction, sell, or otherwise benefit from tax credits without having to engage third parties.
- Develop state tax credits that tax exempt organizations can take advantage of (similar to Oregon law- check).

13. Page 47: It would be reasonable to use carbon fees that are collected from a new construction project to fund the incremental cost of a renewable power plant. The City believes that this may be similar to Indirect Source Rules that some air quality districts are developing.

Example: SMUD's Greenergy renewable energy product costs a premium of 1c/kWh; a typical new building uses 15 kWh per SF per year and will operate for approximately 50 years. A carbon fee of \$7.50 per square foot ( $1c/kWh * 15 \text{ kWh/SF} * 50 \text{ years}$ ) would allow the new construction project in question to be considered near-carbon free.

Attachment A- CNLO

Attachment A

Carbon Neutral Land Use Ordinance (or other reasonable name)

The Carbon Neutral Land Use Ordinance (CNLO) is intended to encourage community planning as opposed to project-by-project planning.

CEQA Significance Threshold: Any new construction or major remodeling project that generates new carbon dioxide emissions is significant due to the cumulative, non-dissipating effects of carbon dioxide. Any project that :

[emits less than [50 ] metric tons per year of direct and indirect carbon dioxide emissions]

[has less than 100 peak hour trips or 1,000 daily trips]

may use the Prescriptive method of compliance and avoid the need to perform an EIR unless other aspects of project require EIR. Projects larger than the:

[50] metric tons per year emissions threshold]  
[has greater than 100 peak hour or 1,000 daily trips]

must use the Performance based approach identified below.

Carbon Dioxide Mitigation Time Table: All new construction projects:

[emitting greater than [50] metric tons per year of CO2 emissions, but less than [900] metric tons per year of CO2 emissions]  
[greater than 100 peak hour trips/day or 1,000 trips per day but smaller than a General Plan Amendment, a Specific Plan (or similar), or a Project as defined by SB 221 or 610]

must mitigate 35% of their carbon emissions in 2008 and increase at the rate of 5% per year until all new construction projects are carbon neutral by 2026. The applicable time date for this requirement is date of permit issuance.

All projects:

[greater than [900] metric tons of CO2 emissions per year]  
[equivalent to a General Plan Amendment, a Specific Plan (or similar), or a Project as defined by SB 221 or 610]

must mitigate 100% of their emissions through a combination of on-site and off-site measures.

In 2007, the per capita emissions rate for Californians was 14 metric tons per person per year; in the absence of better data on project carbon dioxide emissions, this default value will be used to achieve 10.5 metric tons per person per year in 2008 and ratcheting down to 0 metric tons per person per year by 2026.

Compatibility with Title 24 : This ordinance is intended to complement Title 24 and does not conflict. If any incompatibility is found between Title 24 and this ordinance, Title 24 rules. This ordinance addresses several issues not covered by Title 24:

- This ordinance address vehicle miles travelled in order to properly use the development. Vehicle use- both company owned and staff owned.
- Building energy use is covered by Title 24
- Comparing project characteristics to those in the nearby community
- [indirect emissions associated with procurement and contracting choices]

Leakage Clause : This ordinance will not take effect until [75%] of the jurisdictions (by population) within the 6 county SACOG planning region adopt a similar ordinance or unless the State (or AQMD?) passes a law (or regulation) that supersedes the need for this ordinance.

Direct Emissions (Scope 1 ): Direct emissions are those that are generated on-site through burning of fossil fuels in stationary and mobile equipment.

Indirect Emissions (Scope 2): Indirect emissions are those that

are generated by a utility company that provides energy services to the project, most commonly electricity services

Indirect Emissions Associated With Procurement And Contracting Choices (Scope 3): Building users can reduce their carbon footprint based on products that they purchase and in choosing the businesses that they contract with. For example the use of 100% recycled content paper produces fewer carbon dioxide emissions than regular paper.; fuel used by contractors to deliver/haul firms products... how to measure and regulate... BERC certification??

Pre-Approved Land Use Designations: To assist in making sites shovel ready for development, the City has the option of doing the required study indicated under the Performance compliance method and to identify acceptable projects that meet the requirement of this ordinance, thus eliminating the need for the project to do this study in the CEQA document.

Climate Action Trust Fund (CATF ): The CATF is used to mitigate the carbon dioxide emissions of projects by installing projects off-site that reduce emissions locally. Examples of these projects include: (1) low income home weatherization; (2) funding incremental cost of renewable power plants; (3) planting trees; (4) water conservation.

- An alternative compliance mechanism will be provided for those that wish to perform off-site mitigation through a CARB/AQMD certified process

Mandatory Measures Checklist: All items on this checklist must be complied with whether the Prescriptive or Performance Compliance methods are used.

- Projects exempt from Title 24 must be at least [15%] more efficient than business as usual design.
- Projects must be at least [15%] more efficient than Title 24 requires.
- Firms with greater than [25] employees will have a Transportation Systems Management Plan that reduces single occupant vehicle usage by [35%] relative to business as usual.
- Firms with greater than [25] employees that has a company fleet will have it's fleet evaluated at least once every four years by the Sacramento Metropolitan AQMD. The overall make-up of the corporate fleet will comply with Rule xxx .
- Firms must purchase at least [80%] of their printer and copier paper as 100% recycled content, post consumer content waste, and unbleached.

Prescriptive Compliance Approach: This section of the ordinance will be updated tri-annually to ensure that this simpler compliance method meets the intent of the Carbon Dioxide Mitigation Time Table. For projects installed after 2008, the following is required in addition to the Mandatory Measures checklist:

- Project must conform with Pre-Approved Land Use Designation for the site.  
and
- Project must be at least [15%] more efficient than the 2005 Title 24 energy code requires or Project must pay \$[0.20] per gross square foot of floor space into the CATF for each percentage point (or part of) that the project falls below the [15%] minimum efficiency threshold to a maximum of [\$3.00] per gross square foot.

Performance Compliance Approach: This approach requires a project that exceeds the threshold identified above to include a carbon analysis in the CEQA documentation of actual and proposed development within 2 mile radius of CEQA regulated project. At a minimum, the following shall be included in the study:

- (a) actual job count and living unit count
- (b) estimated salary ranges of dwellers in the study area and rental/mortgage costs
- (c) projected job count and living unit count when study area is built out per requirements of General Plan
- (d) number of amenities within  $\frac{1}{2}$  mile of each residential unit;
- (e) percentage of dwelling units that are within  $\frac{1}{2}$  mile of a RT designated transit stop that has a level of service (LOS) A = > 150 stops per week(??); and LOS B (120-150??), C (80-120?), D (50-80?), E (20-50?) and F = < 20 stops per week ??
- (f) percentage of businesses that are within  $\frac{1}{2}$  mile of a transit stop that has a level of service (LOS) A = > 150 stops per week; and LOS B, C, D, E and F = < 20 stops per week??
- (g) ??

Based on accepted planning criteria(?), the study shall use the above facts and estimates to determine :

- (a) Correlation between estimated salary ranges of workers and rental/mortgage costs and how that correlation affects vehicle miles travelled within the study area
- (b) Vehicle miles travelled per year to work within the study area and per household
- (c) Bar graph of the number of amenities that are located within  $\frac{1}{2}$  mile of each living unit in the study area (both actual and built out).
- (d) Per capita emissions of project in most significant units, usually in metric tons per person per year.

If analysis proves to be beneficial to the study area, development fees will be reduced by xx%; if analysis proves to not be beneficial to the study area, development fees are to be increased by yy%. In either case, compliance with the Carbon Dioxide Mitigation Table is required for direct and indirect emissions associated with the project.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 16:55:21

No Duplicates.

**Comment 56 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Justin  
Last Name: Horner  
Email Address: [jhorner@nrdc.org](mailto:jhorner@nrdc.org)  
Affiliation: NRDC

Subject: NRDC Comments on Land use and Local Government in Draft Scoping Plan and Appendices  
Comment:

NRDC respectfully submits these comments on land use and local governments in the Draft Scoping Plan and appendices.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/62-nrdc\\_comments\\_on\\_land\\_use\\_and\\_local\\_govt\\_in\\_draft\\_scoping\\_plan\\_and\\_appendices.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/62-nrdc_comments_on_land_use_and_local_govt_in_draft_scoping_plan_and_appendices.pdf)

Original File Name: NRDC Comments on Land Use and Local Govt in Draft Scoping Plan and appendices.pdf

Date and Time Comment Was Submitted: 2008-08-01 17:38:09

No Duplicates.

## **Comment 57 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: David

Last Name: Schonbrunn

Email Address: David@Schonbrunn.org

Affiliation: TRANSDEF

Subject: LUSCAT-stimulated Ideas

Comment:

Here are some ideas that were stimulated by the LUSCAT process, that didn't make it into the Draft Scoping Plan. They deserve full consideration in the Final Scoping Plan:

High Speed Rail

High-Speed Rail could serve as the future armature tying together the State's far-flung regions. Its routing serves as a de facto land use plan of where the State will grow in the future. As such, the High-Speed Rail project needs State-enacted land use controls, to make sure that development in future High-Speed Rail station areas helps the state achieve its goals for compact growth. Otherwise, the tremendous expense of the project will provide less than optimal benefits in shaping future growth. The needed controls would impose minimum density zoning guidelines as a requirement for station siting, to catalyze a densification of future growth around station areas, and a development focus on urban cores. These controls are needed because the High-Speed Rail FEIRs did not impose meaningful mitigations for growth inducement, or for the sprawl contained in current land use plans.

CEQA

The CEQA Guidelines need to identify what constitutes a significant impact. We suggest that emissions of additional GHGs be considered a significant impact. Add the following to the Air Quality section of the Checklist: "Result in greenhouse gas emissions that delay the attainment of AB 32 targets?"

We believe the ARB will need to create an extensive CEQA Mitigation Bank, which will enable small projects to pay a mitigation fee to be able to receive a Mitigated Negative Declaration. Such an approach would avoid CAPCOA's CEQA meltdown scenario, in which no projects would be able to get through CEQA without an EIR.

We see fees received from small land use projects being invested in renewable energy projects, solar generation plants, energy efficiency projects, and public transit capital projects. Both the fee itself, as well as the modelling process to determine the level of mitigation needed, as well as the investments of the mitigation bank itself will need to be carefully written into regulation, so as to achieve reliable GHG reductions. We see a Mitigation Bank possibly functioning as part of a future Cap and Trade program.

**Funding for Urban and Infill Schools**

A major impediment to Smart Growth is the perception of poor quality urban schools. Attracting families into cities will require good schools. Part of the solution will be additional funding from the State. Please note: The Education Code requirements for playing fields tend to prevent new schools from being sited in infill locations, and push them instead to greenfield locations far from students' neighborhoods. This needs to be fixed.

**Market-Priced Parking**

We need to stop using public funds to subsidize parking. Requiring parking to pay its own way will have a VMT reduction effect, and will result in more economic use of scarce land resources.

**LAFCOs and Infill Determination of Need**

LAFCOs need to be instruments of State policy, restricting the annexation of vacant lands so as to push development into infill locations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 20:34:08

No Duplicates.

## **Comment 58 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Julie

Last Name: Ruelas

Email Address: [jruelas@socal.rr.com](mailto:jruelas@socal.rr.com)

Affiliation: City of San Fernando

Subject: funding for small cities

Comment:

As cities begin to consider the inclusion of small urban villages within their communities as a way of reducing greenhouse gas emissions, funding needs to be made available to all cities, large and small, as incentives for creating such developments that include affording housing for lower income families. This needs to be balanced with the development of parks and open green space in all communities. There needs to be more discussion in the draft plan on the role parks can play dealing with climate change.

I appreciate the recommendations being offered to local governments in doing their part to address global warming and climate change.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-02 12:30:54

No Duplicates.

## **Comment 59 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Arianna

Last Name: Van Meurs

Email Address: arianna\_vanmeurs@sbcglobal.net

Affiliation: Private Citizen

Subject: Improved land use and VMT reduction -> 10 MMT CO2 reduction

Comment:

I would like to express my strong recommendation that CARB adopt a much higher carbon reduction target from improved land use and VMT reduction strategies of at least 10 MMT, but even consider a higher target. Transportation probably represents close to 50% of GHG emissions if refining and drilling emissions are included. While the development of cleaner fuels is underway and vehicle efficiency is easily achieved through regulation, land use policy represents probably the greatest area where state and local government can exert leadership in the race to reduce GHG. The potential for huge GHG reductions will increase over time, but only if we take action now. California has long been at the forefront of environmental policy both nationwide and worldwide and the opportunity is here and now to demonstrate that leadership once again.

Whatever momentum that California can create on this front will surely become a model for other states and the world.

Northeastern states have historically followed California's lead in air quality management. While our leadership in the climate change community may have been lacking in recent administrations, many countries still look to us for ideas, including China whose explosive growth is poised to continue, yet whose government and citizenry have an increasingly heightened awareness of the environmental costs of that growth. Given that country's size and centrally planned government, any lessons that they can learn and quickly implement from California's example would have a hugely exponential effect on GHG reduction. The opportunity to provide leadership is ours.

On the transportation front, the desperate need for increased public transit investment is evident to all policymakers, environmentalists, housing and environmental justice advocates and the average citizen. So far, it is just the political will, wisdom and true commitment to the future that has kept us from acting. Without delay, we need to increase the budget for expanded public transit, financed through carbon program revenues and creative state and federal transportation budget planning. In addition, we need to adopt programs such as congestion pricing that change commuters' behavior and move them out of SOVs to public transit or charge them more for the privilege and environmental cost of driving and parking a car.

On the community design front, let us please empower the regional agencies to finally fulfill their mission. In the 1980s as an urban planning student, I learned about the foundational arguments

for the creation of regional planning agencies. However, these agencies have not yet been given the teeth to execute the degree of coordination that is required to achieve the kind of sustainable, mixed-use, pedestrian-friendly development that many of us planners have been pining for for decades. The MPOs should be given a suite of policy tools and transportation money to reward those localities who demonstrate the courage and leadership to include very specific sustainable design criteria in their General Plans and who succeed in discouraging continued big box retail, suburban office parks or tract home developments and, instead, succeed in encouraging mixed-use, pedestrian friendly, community enriching, transit-oriented developments. In addition, incentives that protect prime agricultural land, conserve forests and encourage urban and suburban small agriculture need to be adopted. Let's also reexamine CEQA to determine how we might streamline the time and cost associated with bringing a truly sustainable project to fruition while penalizing those developers who are change-resistant.

To conclude, we all recognize the difficulty of funding the broad changes alluded to herein, particularly given the state's current budget crisis. While the cumulative benefits for climate change will be huge, they will also accrue to improved environmental justice, household economics, social equity and general quality of life for all California citizens that will eventually be repaid in increased state tax revenue. CARB, the Governor and the Legislature must act decisively in order to reap the cumulative benefits of improved land use patterns and if that means recognizing that the concerns of some constituents and lobbying groups are short-sighted and less worthy, so be it. Be bold! The devil will be in the details. A Blue-Ribbon Committee of far-sighted developers, urban planners and designers, and other land use experts would be an effective way of ensuring that the appropriate design and wording of policies is worked out.

Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-03 22:00:26

No Duplicates.

**Comment 60 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Yvonne

Last Name: Burke

Email Address: [seconddistrict@bos.lacounty.gov](mailto:seconddistrict@bos.lacounty.gov)

Affiliation:

Subject: Comments re Scoping Plan

Comment:

please see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/66-mary\\_nichols.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/66-mary_nichols.pdf)

Original File Name: Mary Nichols.pdf

Date and Time Comment Was Submitted: 2008-08-04 11:10:52

No Duplicates.

**Comment 61 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Joyce M

Last Name: Eden

Email Address: comment@sonic.net

Affiliation: West Valley Citizens Air Watch

Subject: Greenhouse Gas Sector 2. Land Use and Local Government

Comment:

GHG Sector 2. Land Use and Local Government

West Valley Citizens Air Watch (WVCAW) Comments:

Restoration of publicly financed and owned light rail (most residents do not even realize existed in probably most of the major cities in the US until the 1950s) should be built into planning for the future as well as safe, accessible bike paths, separated from roads by recycled tire rubber curbs.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-04 11:51:28

No Duplicates.

**Comment 62 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Cara

Last Name: Martinson

Email Address: cmartinson@counties.org

Affiliation: California State Association of Counties

Subject: CSAC Comments on ARB Draft Scoping Plan

Comment:

Attached you will find the California State Association of Counties (CSAC) comment letter on the ARB Draft Scoping Plan.

Thank you.

Cara Martinson

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/68-csac\\_scoping\\_plan\\_comments\\_\\_8-1.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/68-csac_scoping_plan_comments__8-1.pdf)

Original File Name: CSAC Scoping Plan Comments \_8-1.pdf

Date and Time Comment Was Submitted: 2008-08-07 13:41:53

No Duplicates.

**Comment 63 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Gretchen

Last Name: Hardison

Email Address: gretchen.hardison@lacity.org

Affiliation:

Subject: City of Los Angeles Comments on the Draft AB32 Scoping Plan

Comment:

The attached file contains the comments of the City of Los Angeles on the draft AB32 Scoping Plan.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/69-comments\\_draft\\_ab32\\_scoping\\_plan.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/69-comments_draft_ab32_scoping_plan.pdf)

Original File Name: Comments Draft AB32 Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-07 13:49:12

No Duplicates.

**Comment 64 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Yvette

Last Name: Rincon

Email Address: [yrincon@cityofsacramento.org](mailto:yrincon@cityofsacramento.org)

Affiliation: City of Sacramento

Subject: City of Sacramento Comments on Local Govt Section of Appendices

Comment:

Please find attached comments by the City of Sacramento

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/70-ab\\_32\\_appendices\\_city\\_of\\_sac\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/70-ab_32_appendices_city_of_sac_comments.pdf)

Original File Name: AB 32 Appendices City of Sac Comments.pdf

Date and Time Comment Was Submitted: 2008-08-08 11:48:13

No Duplicates.

## **Comment 65 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Sandra

Last Name: Skolnik

Email Address: skolniks@pacbell.net

Affiliation:

Subject: Local Land Use and General - Not Far Enough

Comment:

Local municipalities should submit environmental impact reports for major programs affecting other communities. For instance, the City of Sunnyvale's land use deliberations on the use of Moffett Field property should not be left up to a few people in city government.

In general (we were referred to a general comments area, but there is none, so I am including my general comments here):

When is enough enough? Business comes first and the heck with people? While each sector of our society has its own self interests in mind, the issue is the well being and health of all of its citizens as well as the environment we live in.

The climate issues and global repercussions are serious and have been confirmed by experts in the fields, as well as manifested in our environment - it is not up to business persons to claim whether there is or is not global warming, and it is not up to the state to constantly appease business. It would seem that we need to be more aggressive in the steps and timetable it will take to reduce human affects on the environment. While we are projecting out 12-42 years, the environment continues to deteriorate - compounding the problem. The environment waits for noone - government, lawyers or business.

The plan needs to be strengthened and expanded. Polluters should pay - it is not a 'right' to do business in California - it should be considered a privilege. Businesses that practice good social and environmental practices should be rewarded and those that don't should be penalized. I agree that California workers should be trained in new technologies. Polluting companies that use the argument that they will create new jobs to justify continue unneeded development and tax breaks is a manipulative trick - who are new jobs being created for? Californianans? Or will it create the need to import more workers, develop more precious land and create continuing overpopulation which will compound the problems we already have?

Maximum tax credits should be given to energy efficient research and consumer purchases, including cars, appliances. The oil industry should not receive public welfare, while alternative energy research goes begging for money.

Finally, I do not see provisions for preservation and protection

of natural resources and wildlife that depends on them. How will this plan address the need for financial support of our parks and natural resources?

The State may be assuming leadership in this type of plan, but if it doesn't have any teeth, than we will be forced to eat spoiled applesauce.

Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-10 14:38:33

No Duplicates.

**Comment 66 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Rob

Last Name: Rundle

Email Address: rru@sandag.org

Affiliation:

Subject: AB 32 Local and Regional Government

Comment:

Attached are comments on the draft Scoping Plan submitted by SANDAG.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/72-scoping\\_plan\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/72-scoping_plan_comments.pdf)

Original File Name: Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-08-11 09:24:16

No Duplicates.

## **Comment 67 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Patrick

Last Name: Griffith

Email Address: [pgriffith@lacsdo.org](mailto:pgriffith@lacsdo.org)

Affiliation: Los Angeles County Sanitation Districts

Subject: LACSD Comments on the ARB Draft Scoping Plan: Local Government

Comment:

LACSD offers the following comments on the discussion concerning Local Government Actions and Regional Targets in the Draft Scoping Plan:

1. Page C-42: We remain very concerned about how local governments will allocate responsibility for emissions inventories and emissions reductions to sources under their jurisdictions without a significant possibility of double-counting. This seems to be particularly the case as the local government source category is further refined into "community" level analyses. To examine a case in point, please provide some explanation of how a regional local government program meshes with Community Energy and Community Waste and Recycling concepts articulated on this page. Local community actions can also be difficult to calculate from a credit standpoint in the case of regionally operated waste disposal facilities. Energy recovery from these programs needs to be allocated on some basis to the respective communities under the regional government umbrella. Please see our July 18, 2008 comment letter on CCAR's Local Government Operations Protocol on this issue. We think it is very important that CARB abide by its promise at the very bottom of page 32 of the Draft Scoping Plan that "ARB will work with local governments to reconcile local level accounting with state and regional emissions tracking as the Scoping Plan is implemented."

2. C-45: We strongly believe that CARB should input into California Office of Planning and Research and the Resources Agency that actions taken in accordance with the Scoping Plan should be categorically exempt from a GHG analysis component of any environmental document that is prepared for a project.

3. C-51: The ARB has stated many times that if push comes to shove, compliance with health-based criteria pollutant regulations will have priority over GHG considerations. With that in mind, we wonder about the benefit of performing GHG calculations as part the Subsurface Cleanup Technology discussion that the SWRCB may implement. Irrespective of the amount of GHG emitted by RTOs, for example, the elimination of groundwater contamination will always take precedence. The ARB should weigh in on decisions like these made by other state agencies and at least attempt to streamline or reduce unnecessary exercises required by other state agencies.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-11 14:15:41

No Duplicates.

**Comment 68 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Daniel  
Last Name: Parolek  
Email Address: daniel.parolek@opticodesign.com  
Affiliation: Congress for the New Urbanism

Subject: Appendix C; Regional/Local Targets

Comment:

Attached is PDF of the Comments by the Congress for the New Urbanism.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/74-comments\\_by\\_the\\_congress\\_for\\_the\\_new\\_urbanism.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/74-comments_by_the_congress_for_the_new_urbanism.pdf)

Original File Name: Comments by the Congress for the New Urbanism.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:01:03

No Duplicates.

**Comment 69 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Susan J.

Last Name: Daluddung

Email Address: cseghers@arb.ca.gov

Affiliation: City of Hayward

Subject: Draft Scoping Plan

Comment:

Please see the attached letter

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/75-7\\_30\\_08\\_cityofhayward.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/75-7_30_08_cityofhayward.pdf)

Original File Name: 7\_30\_08\_cityofhayward.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:22:41

No Duplicates.

**Comment 70 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Jan

Last Name: Perry

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

Affiliation: City of Los Angeles

Subject: Higher Priority for VMT reduction in the AB 32 Scoping Plan

Comment:

Please see attached letter

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/76-7\\_08\\_08\\_losangelescitycouncil.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/76-7_08_08_losangelescitycouncil.pdf)

Original File Name: 7\_08\_08\_losangelescitycouncil.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:25:22

No Duplicates.

## **Comment 71 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Julio

Last Name: Magalhaes

Email Address: julio.magalhaes@sierraclub.org

Affiliation: Loma Prieta Chapter, Sierra Club

Subject: Opportunity for early GHG emission reductions from local government action

Comment:

Dear Air Resources Board:

I am the Global Warming Program Coordinator with the Sierra Club's Loma Prieta Chapter, which includes Santa Clara, San Mateo, and San Benito Counties. I am posting these comments on behalf of the 20,000 members of our Chapter and the over 2400 people in our opt-in Global Warming Database. Our Chapter has a quite extensive Global Warming Program focused on local action to reduce GHG emissions. I would like to ask you to more fully consider the important role local governments can play in the emission reduction plan laid out in the Climate Change Scoping Plan

The most active initiative in our chapter's Global Warming Plan is the Cool Cities Campaign. This National Sierra Club campaign forms teams of residents in each city and county to work with local government leaders for decisive action to control GHG emissions. Our Chapter's Cool Cities campaign has formed 19 Cool Cities City Teams of resident volunteers to urge their local government leaders to sign the U.S. Mayors Climate Protection Agreement or the Cool Counties Climate Stabilization Declaration and to then implement these commitments through achievement of a series of milestones. A petition to you signed by over 180 of our highly active Cool Cities Team volunteers is attached urging you to take-up the suggestions made in this comment letter.

Since November 2006, when our local Cool Cities Campaign was launched, 15 additional cities have signed the MCPA and two counties have signed the Cool Counties Declaration. This makes a total of 25 jurisdictions that have now committed to reduce community-wide emissions (corresponding to 68% by number and 85% by population).

Our Chapter is about to release a study entitled Cool Cities Local Government Climate Action Survey which studies climate protection commitments and actions by local governments in Santa Clara and San Mateo Counties. This study demonstrates that local governments in San Mateo and Santa Clara Counties show rapidly growing engagement on climate protection. However, achievement of essential milestones toward emission reduction is still generally lagging.

As you finalize the Climate Change Scoping Plan, I urge you do the following:

1. Recognize the opportunity for early emissions reductions created by the rapidly growing engagement of local governments in

the Bay Area and elsewhere on climate protection.

2. Properly quantify the emission reductions that would be possible through early local government action.

3. Provide local governments with much needed technical guidance and assistance on emission inventories, emission reduction targets, and climate action planning and emission reduction measures.

4. Make an investment in early emission reductions by providing financial support to cities and counties that are willing to take early action.

Our Cool Cities Local Government Climate Action Survey report suggests that a combination of public engagement with local government leaders, outside initiatives facilitating specific climate protection actions, and financial assistance to jurisdictions is essential for rapid decisive action to occur at a level needed to meet the climate change/ clean energy challenge.

I hope the California Air Resources Board will do its part to foster early emissions reduction actions by local governments. I promise you that we will do our part to foster public engagement. Thank you.

Sincerely,  
Julio Magalhães

Julio Magalhães, Ph.D.  
Global Warming Program Coordinator  
Sierra Club, Loma Prieta Chapter  
3921 East Bayshore Road, Suite 204  
Palo Alto, CA 94303

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/77-petition\\_to\\_arb\\_on\\_draft\\_scoping\\_plan.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/77-petition_to_arb_on_draft_scoping_plan.pdf)

Original File Name: Petition to ARB on Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-11 19:27:23

No Duplicates.

**Comment 72 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Derek

Last Name: Walker

Email Address: dbwalker@edf.org

Affiliation: Environmental Defense Fund

Subject: EDF - Land Use comments

Comment:

Please accept the attached land use comments from Environmental Defense Fund on the AB 32 draft Scoping Plan.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/78-edf\\_-\\_land\\_use\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/78-edf_-_land_use_comments.pdf)

Original File Name: EDF - Land Use comments.pdf

Date and Time Comment Was Submitted: 2008-08-12 15:09:40

No Duplicates.

**Comment 73 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Derek

Last Name: Walker

Email Address: dbwalker@edf.org

Affiliation: Environmental Defense Fund

Subject: EDF - Appendix to Land Use comments

Comment:

Please accept the attached appendix to Environmental Defense Fund's comments on land use in the AB 32 draft Scoping Plan.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/79-appendix\\_b\\_-\\_frank\\_isr\\_report.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/79-appendix_b_-_frank_isr_report.pdf)

Original File Name: Appendix B - Frank ISR report.pdf

Date and Time Comment Was Submitted: 2008-08-12 15:12:56

No Duplicates.

**Comment 74 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Jim

Last Name: Antone

Email Address: [jantone@ysaqmd.org](mailto:jantone@ysaqmd.org)

Affiliation: Yolo-Solano Air Quality Mgmt. District

Subject: Active Transportation/Complete Streets

Comment:

Since almost half of the vehicle trips are less than two miles, a significant effort should be put into promoting, planning for and securing funds for active transportation modes (bicycling, walking and public transportation). This effort should also include adoption of the complete streets concept for new and existing roadways complemented by smart or sustainable land use patterns that encourage active transportation modes.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-12 16:42:12

No Duplicates.

**Comment 75 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Anthony

Last Name: Bruzzone

Email Address: cseghers@arb.ca.gov

Affiliation:

Subject: AB 32 Scoping Plan

Comment:

please see attached letter

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/81-7\\_11\\_08\\_bruzzone.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/81-7_11_08_bruzzone.pdf)

Original File Name: 7\_11\_08\_bruzzone.pdf

Date and Time Comment Was Submitted: 2008-08-14 11:04:16

No Duplicates.

**Comment 76 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Sharon

Last Name: Sprowls

Email Address: [ssprowls@housingca.org](mailto:ssprowls@housingca.org)

Affiliation: Housing California

Subject: Housing California comments on draft Scoping Plan

Comment:

Please see our attached letter providing our comments on the Draft Scoping Plan.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/82-housing\\_ca\\_comments\\_on\\_draft\\_scoping\\_plan.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/82-housing_ca_comments_on_draft_scoping_plan.doc)

Original File Name: Housing CA comments on Draft Scoping Plan.doc

Date and Time Comment Was Submitted: 2008-08-14 16:15:30

No Duplicates.

**Comment 77 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Rachel

Last Name: Dinno-Taylor

Email Address: [Rachel.Dinno@tpl.org](mailto:Rachel.Dinno@tpl.org)

Affiliation: Trust for Public Land

Subject: GHG Benefits from Urban Parks

Comment:

Please accept the attached comments from the Trust for Public Land regarding the GHG Benefits of Urban Parks.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/83-tpl\\_comments\\_\\_draft\\_scoping\\_plan\\_\\_ghg\\_benefits\\_of\\_urban\\_parks.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/83-tpl_comments__draft_scoping_plan__ghg_benefits_of_urban_parks.pdf)

Original File Name: TPL comments (Draft Scoping Plan) GHG Benefits of Urban Parks.pdf

Date and Time Comment Was Submitted: 2008-08-15 17:01:18

No Duplicates.

**Comment 78 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Stephanie  
Last Name: Reyes  
Email Address: [sreyes@greenbelt.org](mailto:sreyes@greenbelt.org)  
Affiliation: Greenbelt Alliance

Subject: Higher priority for land use in the AB 32 Scoping Plan

Comment:

Greenbelt Alliance's comments on the draft AB32 Scoping Plan are attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/84-2008-08\\_greenbelt\\_alliance\\_scoping\\_plan\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/84-2008-08_greenbelt_alliance_scoping_plan_comments.pdf)

Original File Name: 2008-08 Greenbelt Alliance Scoping Plan Comments.pdf

Date and Time Comment Was Submitted: 2008-08-18 13:41:55

No Duplicates.

**Comment 79 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Autumn

Last Name: Bernstein

Email Address: [autumn@climateplan.org](mailto:autumn@climateplan.org)

Affiliation: ClimatePlan

Subject: ClimatePlan Comments on Land Use Sector

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/85-cp.comments.8.20.08.final.pdf>

Original File Name: CP.comments.8.20.08.final.pdf

Date and Time Comment Was Submitted: 2008-08-20 12:37:44

No Duplicates.

**Comment 80 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Tom

Last Name: Scott

Email Address: tom@housingsandiego.org

Affiliation: San Diego Housing Federation

Subject: Land Use Incentives in Scoping Plan

Comment:

Please see attached letter

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/86-ab32\\_scoping\\_plan\\_ltr.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/86-ab32_scoping_plan_ltr.pdf)

Original File Name: AB32 Scoping Plan Ltr.pdf

Date and Time Comment Was Submitted: 2008-08-20 17:07:24

No Duplicates.

**Comment 81 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Sue

Last Name: Rainey

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

Affiliation: Contra Costa County Mayors Conference

Subject: Draft Scoping Plan

Comment:

Please see attached letter

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/88-8\\_22\\_08\\_contracostacountymayorsconfence.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/88-8_22_08_contracostacountymayorsconfence.pdf)

Original File Name: 8\_22\_08\_contracostacountymayorsconfence.pdf

Date and Time Comment Was Submitted: 2008-08-26 14:56:14

No Duplicates.

## **Comment 82 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Judy

Last Name: Corbett

Email Address: [kwright@lgc.org](mailto:kwright@lgc.org)

Affiliation:

Subject: LGC member letter

Comment:

Dear Chair Nichols and Members of the Air Resources Board:

We thank you for your dedicated and tireless work in addressing the implementation of AB 32. We think this plan represents a critical milestone in addressing the overwhelming challenge of Global Climate Change.

As members of the Local Government Commission, primarily elected officials, we would like to submit the attached suggestions on the scoping plan.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/89-carb\\_final\\_letter\\_8.27.doc](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/89-carb_final_letter_8.27.doc)

Original File Name: CARB\_final\_letter\_8.27.doc

Date and Time Comment Was Submitted: 2008-08-27 11:07:48

No Duplicates.

**Comment 83 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Will

Last Name: Travis

Email Address: cseghers@arb.ca.gov

Affiliation: bcdc

Subject: Climate Change Draft Scoping Plan for AB 32

Comment:

Please see attached letter

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/90-8\\_26\\_08\\_sfbcdc.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/90-8_26_08_sfbcdc.pdf)

Original File Name: 8\_26\_08\_sfbcdc.pdf

Date and Time Comment Was Submitted: 2008-09-02 15:17:30

No Duplicates.

**Comment 84 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Shiloh

Last Name: Ballard

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

Affiliation: Silicon Valley Leadership Group

Subject: VMT in AB 32 Scoping Plan

Comment:

Please see the attached comment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/91-7\\_09\\_08\\_siliconvalleyleadershipgroup.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/91-7_09_08_siliconvalleyleadershipgroup.pdf)

Original File Name: 7\_09\_08\_siliconvalleyleadershipgroup.pdf

Date and Time Comment Was Submitted: 2008-09-03 12:58:34

No Duplicates.

**Comment 85 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Kate

Last Name: Rube

Email Address: krube@smartgrowthamerica.org

Affiliation:

Subject: Strengthen the Land Use & Transportation Components

Comment:

See attached file.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/92-letter\\_to\\_schwarzenegger\\_9-08.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/92-letter_to_schwarzenegger_9-08.pdf)

Original File Name: Letter to Schwarzenegger 9-08.pdf

Date and Time Comment Was Submitted: 2008-09-04 09:09:13

No Duplicates.

**Comment 86 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Craig

Last Name: Tranby

Email Address: craig.tranby@lacity.org

Affiliation: City of Los Angeles

Subject: City of L.A. Comments on Appendices

Comment:

Please find attached the City's comments on the draft Scoping Plan Appendices which are in addition to the previously submitted comments on the draft Scoping Plan. Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/93-city\\_of\\_la\\_comments\\_on\\_scoping\\_plan\\_appendices.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/93-city_of_la_comments_on_scoping_plan_appendices.pdf)

Original File Name: City of LA comments on Scoping Plan appendices.pdf

Date and Time Comment Was Submitted: 2008-09-10 14:28:14

No Duplicates.

**Comment 87 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Jill

Last Name: Boone

Email Address: [jill.boone@ceo.sccgov.org](mailto:jill.boone@ceo.sccgov.org)

Affiliation: County of Santa Clara

Subject: Santa Clara County

Comment:

see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/94-santaclaracountycomments.doc>

Original File Name: SantaClaraCountyComments.doc

Date and Time Comment Was Submitted: 2008-09-22 15:04:15

No Duplicates.

**Comment 88 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Susan

Last Name: Lorenz

Email Address: [susan.lorenz@westonsolutions.com](mailto:susan.lorenz@westonsolutions.com)

Affiliation:

Subject: Energy Efficiency Comments

Comment:

Please see the attached document for comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/95-ab\\_32\\_comments-energy\\_efficiency.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/95-ab_32_comments-energy_efficiency.pdf)

Original File Name: AB 32 Comments-Energy Efficiency.pdf

Date and Time Comment Was Submitted: 2008-09-29 13:56:52

No Duplicates.

## **Comment 89 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Sophie

Last Name: Lapaire

Email Address: Sophie@bridgemakersconsulting.com

Affiliation:

Subject: Missing information

Comment:

Greetings,

Agriculture is responsible for approximately 30% of global warming, mainly through carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxide (NO<sub>x</sub>) emissions.

I couldn't help notice that you have no mention of organic farming in your plan. You may or may not know that organic farming not only produce virtually any CO<sub>2</sub> but also captures it in the soil for a very long time. Vegetative material decomposes and adds to the soil organic matter levels in the soil, thus storing carbon dioxide. Soil contains about twice as much carbon as the atmosphere

Unlike conventional agro farming which uses large amounts of nitrogen fertilizer and pesticides (all petroleum based) that are released into the air. This MUST be considered and added to your plan as a sustainable solution in the short, medium and long run.

Organic farming not only out performs chemical based farming, but protects the health of the soil, farmers, laborers, rivers, beneficial insects, consumers, animals, just to mention a few.

If only 10,000 medium sized farms in the US converted to organic production, they would store so much carbon in the soil that it would be equivalent to taking 1,174,400 cars off the road, or reducing car miles driven by 14.62 billion miles.

This isn't something small and MUST be included in your plan. You have good data so far, but this information is totally missing. Please see that it is added to it. Thank you

Below are links to more information from respected institutions on this topic:

<http://persianoad.wordpress.com/2007/04/08/organic-farming-tackles-global-warming/>

<http://www.organicconsumers.org/organic/stabalize062404.cfm>

<http://www.strauscom.com/rodale-whitepaper/>

[http://www.newfarm.org/depts/NFField\\_trials/1003/carbonsequest.shtml](http://www.newfarm.org/depts/NFField_trials/1003/carbonsequest.shtml)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-29 20:51:59

No Duplicates.

**Comment 90 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Martha

Last Name: Ozonoff

Email Address: [mozonoff@californiareleaf.org](mailto:mozonoff@californiareleaf.org)

Affiliation: California ReLeaf

Subject: including urban forestry in scoping plan

Comment:

I respectfully submit the following comments related to the Air Resources Board's draft Scoping Plan

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/97-ca\\_releaf\\_letter\\_local\\_government\\_scoping\\_plan.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/97-ca_releaf_letter_local_government_scoping_plan.pdf)

Original File Name: Ca Releaf letter Local Government Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-09-30 15:47:24

No Duplicates.

## **Comment 91 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: David  
Last Name: petritz  
Email Address: dpetritz@sbcglobal.net  
Affiliation: Member Congress of the New Urbanism

Subject: Appendix C; Regional/Local Targets

Comment:

Mary Nichols, Chairman  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

Dear Ms. Nichols,

As one who has spent most of the past decade as a municipal planner in southern California, I would like to enthusiastically endorse the Congress of the New Urbanism comments (No. 68 of Land use subsection) regarding the urgent need for the scoping plan to put substantially more emphasis on implementing greenhouse gas reduction targets for land development. While some reductions will result from implementing energy efficiency policies, exponentially more can be accomplished if such policies are integrated with an equal emphasis on smart growth land use policies.

Indeed, for California to continue to be viewed as an environmental leader, such a synergistic integration of policies is absolutely essential. Likewise, for California to continue to be viewed as an engine for economic innovation, nothing less will suffice, since the future strength of the state's economy largely depend on how well it is able to maximize the opportunity to become energy efficient. Setting the land use development bar un-sustainably low, simply means that California will increasingly be uncompetitive in the global marketplace as sub-continents such as the European Union aggressively pursue policies that effectively integrate smart technology and land use policies!

I thank you for your time and consideration of my comments.

Sincerely

David James Petritz

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 17:33:05

No Duplicates.

**Comment 92 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Timothy

Last Name: Coyle

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

Affiliation: California Building Industry Association

Subject: AB 32 Scoping Plan

Comment:

Please see attached letter

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/99-10\\_2\\_08\\_cbia.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/99-10_2_08_cbia.pdf)

Original File Name: 10\_2\_08\_CBIA.pdf

Date and Time Comment Was Submitted: 2008-10-03 11:50:43

No Duplicates.

**Comment 93 for Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) - 1st Workshop.**

First Name: Arianna

Last Name: Van Meurs

Email Address: cseghers@arb.ca.gov

Affiliation:

Subject: VMT reductions

Comment:

please see attached comment

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/100-8\\_03\\_08\\_ariannavanmeurs.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/sp-landuse-ws/100-8_03_08_ariannavanmeurs.pdf)

Original File Name: 8\_03\_08\_ariannavanmeurs.pdf

Date and Time Comment Was Submitted: 2008-10-03 11:56:32

No Duplicates.

**There are no comments posted to Land Use Comments for the GHG Scoping Plan (sp-landuse-ws) that were presented during the Workshop at this time.**