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

RE: Climate Change Scoping Plan First Update Discussion Draft

Dear Chairman Nichols and Air Resources Board Members:

On behalf of the Safe Routes to School National Partnership, we would like to thank the California Air Resources Board for your hard work toward reducing California's greenhouse gas emissions and for providing this opportunity to comment on the Scoping Plan Update Discussion Draft.

The discussion draft outlines multiple strategies for reducing greenhouse gas emissions (GHG) from the transportation sector, which generates the greatest share of emissions. While we support all efforts to reduce GHG emissions from motorized vehicles, we believe the Discussion Draft should place greater emphasis on reducing Vehicle Miles Traveled (VMT), improving transportation and land use planning, and increasing the use of alternatives such as transit and active transportation.

Increased levels of bicycling and walking in lieu of vehicle travel must play a significant role in reducing GHG emissions if California wants to meet the targets set by AB 32. Automobiles and light trucks account for approximately 50 percent of air pollution (40 percent of GHG emissions) in California and 70 percent of its consumption of petroleum. While vehicle and fuel innovations will reduce emissions and air pollution per capita, much of the total GHG emission benefit that will be realized by motor vehicle efficiencies in the coming years will be offset by increases in VMT due to the addition of 12 million new residents to the state by 2050. Therefore, AB 32 and SB 375 must be implemented through investment in land use patterns, transit connections, and active transportation networks that reduce demand for trips by motorized vehicles.

Reducing VMT, improving transportation and land use planning and expanding the use of active transportation can provide many co-benefits that zero emissions vehicles cannot achieve. These include:

- Reduced household transportation costs.
- Expanded transportation options
- Increased levels of physical activity

- Decreased chronic disease outcomes
- Reduced co-pollutants
- Improved local economy
- Reduced energy costs
- Improved safety for bicyclists and pedestrians

The co-benefits of active transportation options are especially critical to disadvantaged communities, where roadway safety risks, air pollution exposure, and inactivity-related chronic diseases tend to be greatest.

The National Partnership recommends that ARB consider the following opportunities for expanding and strengthening the Discussion Draft.

- Set a target for active transportation mode share for the state and for each metropolitan planning region by 2020, as well as a VMT reduction target, to signal the importance of shifting demand toward alternate modes. We recommend a doubling of trips by walking and a three-fold increase in trips by bicycling by 2020. A clear nexus exists between shifting trips to bicycling and walking and reducing GHGs and VMT. Increasing mode share for active transportation can also play a unique role in providing public health co-benefits and reducing co-pollutants.
- Recommend additional funding for the Active Transportation Program from Cap and Trade revenues in the investment plan. We propose dedicating 20 percent of all Cap and Trade revenues that are set aside for transportation to expanding the Active Transportation Program.
- Require all transportation projects that receive cap-and-trade revenues to address complete streets requirements outlined in AB 1358 and DD-64-R1 to improve public safety.
- Transportation projects must decrease co-pollutants, as well as GHGs. To ensure both goals are met, projects should decrease overall vehicle miles traveled.
- Projects earmarked to comply with SB 535 must specifically address the high priority needs of one or more disadvantaged communities, achieve measurable benefits for them, and deliver benefits that significantly outweigh any burdens that will fall on those communities.
- Ensure that program selection criteria in the Discussion Draft maximizes co-benefits such as improved public health, social equity, green jobs and the protection of habitat and agricultural land

In addition to these suggestions, we have attached a list of specific wording changes and language to better incorporate active transportation into the Discussion Draft.

Sincerely,

Jeanie Ward-Waller
California Advocacy Organizer
Safe Routes to School National Partnership

Rye Baerg
SoCal Regional Policy Manager

Note on suggested text edits: Additions are underlined and subtractions are noted with a ~~strikethrough~~. Additional comments are written in **bold text**.

ES-1	California's plan for reducing emissions is comprised of strategies to encourage efficiency in the use of energy and resources, decarbonize our energy and fuel supply, and reduce our demand for greenhouse gas (GHG) emissions-intensive goods and modes of travel.
ES-2	California is also making major strides toward reducing the number of miles vehicles are driven, through more sustainable transportation, land use, and housing planning. The state is leading those efforts with programs and plans that encourage a change in land use patterns and a shift to cleaner modes of transportation, including ~~expanded~~ bicycling, walking, transit, passenger rail, and high-speed rail service. To date, seven Metropolitan Planning Organizations have adopted Sustainable Community Strategies. In addition to helping drive GHG reductions, these plans will help create more livable communities that offer greater housing and transportation options; improved access to resources and services; safer, more vibrant neighborhoods; and healthier lifestyles where people can live, work, and play without having to get into a car."
ES-4	Changing California's transportation sector to one that reduces VMT by supporting active transportation and transit and reduces emissions by shifting to ~~dominated by~~ zero emission vehicles, powered by electricity and hydrogen, is essential to meeting federal air quality standards and long-term climate goals. Achieving the 2050 target will require dramatically improving vehicle energy efficiency, widespread electrification of on-road vehicles, development of low carbon liquid fuels, and smarter, more integrated land use planning and development that expands opportunities for short trips to be taken by walking or bicycling. Emphasis should be directed toward investments that provide affordable, equitable transportation options with the greatest co-benefits.
DD-20	California has undertaken a number of notable groundbreaking climate change initiatives. These include the first in the nation economywide Cap-and-Trade program, the Low Carbon Fuel Standard, a 33 percent Renewable Portfolio Standard, and an Advanced Clean Cars program that has been adopted at the federal level. ARB has also worked closely with our local and regional partners to implement the Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375). Strategies developed under this program integrate land use, housing, and transportation planning to reduce regional passenger vehicle GHG emissions and vehicle miles-traveled (VMT). In addition to these efforts, additional actions include… High-Speed Rail, and the Active Transportation Program.
DD-23	Incentive funding is essential to encourage use of alternative modes, spur fleet turnover and the development of advanced technologies critical to meeting

	California's GHG emission reduction goals. Finally, Senate Bill 99 creates an active transportation program to increase funding of bicycle and pedestrian infrastructure, which is funded at an annual level of $129 million.
DD-23	As a result of Senate Bill 375 (Steinberg, Chapter 728, Statutes of 2008), the Sustainable Communities and Climate Protection Act of 2008, ARB set per-capita passenger vehicle GHG emission reduction targets for California's metropolitan regions in California. The goal of SB 375 is to reduce GHG emissions and vehicle miles-traveled from passenger vehicles through location efficiency. This is accomplished through better-integrated regional transportation, land use, and housing planning, with housing that is denser to promote active transportation and with transit access to jobs and services. Regional and local planning agencies are responsible for developing Sustainable Communities Strategies (SCS) as part of the federally required Regional Transportation Plan and State-required general plan housing elements. Sustainable Communities Strategies promote more travel and housing choices through greater access to alternative forms of transportation (including public transit, biking, and walking) and development patterns where people can live, work, and play without having to drive ~~great distances~~. Implementation of these strategies hinges on local actions to realize the GHG reductions envisioned in the regional SCSs. SB 375 implementation strategies are designed to support local development of "transit priority projects," or transit-oriented development (TOD).
DD-56	In an effort to improve mobility options for California residents, the RTP/SCSs are also increasing opportunities for residents to use bicycling and walking as travel alternatives. Active transportation increases physical fitness and improves mental health. The health benefits of physical activity are extensive and well documented: physical activity—even in modest amounts—has been linked with a decreased risk of cardiorespiratory diseases, type 2 diabetes, breast and colon cancer, depression, cognitive decline, all-cause mortality, and improved musculoskeletal health. Risks of many of these chronic diseases occur in higher rates in disadvantaged communities, which serve to benefit the most from active transportation alternatives, where roadway safety risks to pedestrians and bicyclists are also higher.
DD-86	*Enable a fundamental transition of the transportation sector—how communities develop and expand, how people travel, how freight is moved, and what fuels are used. Ultimately, decreased VMT, increased use of transit, bicycling and walking and widespread use of electricity and hydrogen as transportation fuels from low carbon sources, with low carbon renewable fuels being used where internal combustion engines cannot feasibly be replaced.*

DD-88	**This section does not have a clear description of how active transportation can play a role in reducing VMT, GHG and chronic disease. We propose the following language:** Significant investments in walking and bicycling in coordination with transit and land use investments offer cost effective opportunities to implement AB 32 and reduce greenhouse gas emissions (GHG) in California. Specifically, investments in comprehensive bicycling and multi-use trail networks, first and last mile connections to transit, Safe Routes to School programs, and the creation of walkable neighborhoods through new and infill development all offer opportunities to reduce vehicle miles traveled (VMT), reduce GHG emissions and improve the health of Californians and their economy. The current rate of funding for active transportation in California does not adequately address the need for additional investments in these modes. According to the 2009 National Household Travel Survey: ● Approximately 15% of all trips in California are currently made by bicycling or walking. ● Approximately 50% of all trips in California are under 3 miles and 60 percent of trips less than one mile are currently taken by automobile. These trips can easily be accomplished by walking or bicycling. ● Approximately 62% of children in CA live within two miles of school, yet 51 percent of these children are driven to school in a private vehicle. By providing additional resources for active transportation from cap-and-trade revenues, California will be able to reduce GHG emissions, improve public safety, improve public health, reduce co-pollutants and assure that active transportation funding needs are addressed at similar rates to other transportation programs.
DD-90	Support increased investment in active transportation and other VMT reduction strategies from existing and new funding sources such as Cap and Trade revenues. **Set a target for increasing the number of trips by bicycling and walking, or encourage the State Transportation Agency to set such a target.**
DD-90	Pursue research in the following areas: distribution of and aggregated benefits of sustainable community strategies including increased investments in transit and active transportation.
DD107	**The Active Transportation Program should be added to the list of regional and state incentive programs - a key goal of the program is to support regional implementation of SB375 to meet GHG reduction targets through bicycling and walking programs and projects.**
DD-110	**The Active Transportation Program should be added to the list under**

	“Expansion of established programs.”
DD-111	Electric vehicles are a common sight on our streets and highways, and each day brings more charging stations to parking structures and shopping malls. Biofuel is available at retail outlets. Even big-rigs are getting a climate makeover as trailer skirts, low rolling resistance tires, and aggressively aerodynamic cabs mean less wind resistance, more fuel efficiency, and fewer GHG emissions. In our urban centers more people are choosing to live in vibrant, walkable communities and travel by transit, walking and bicycling to reach their destinations.