



April 24, 2013

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

**RE: CARB's Cap-and-Trade Draft Investment Plan: Support for Active Transportation**

The Safe Routes to School National Partnership would like to take this opportunity to thank CARB for responding to stakeholder input in the Draft Cap-and-Trade Auction Proceeds Investment Plan for Fiscal Year 2013-14 through 2015-16. With this plan CARB has provided a clear blueprint for reducing greenhouse gas (GHG) emissions through investments in active transportation.

Active transportation can help reduce GHG emissions while simultaneously providing multiple co-benefits such as improved air quality, reduced co-pollutants, improved public health and a greater number of jobs per million dollars spent. At the same time, active transportation projects are sorely needed in disadvantaged communities to provide mobility choices, reduce local pollutants, and to address the disproportionate number of injuries and fatalities suffered by bicyclists and pedestrians in these communities.

Funding for active transportation currently falls far short of the need. Approximately 15 percent of trips in California are currently made by walking and bicycling, and a staggering 23 percent of roadway collisions result in the serious injury or death of a bicyclist or pedestrian. The current rate of funding for active transportation (~1 percent of transportation dollars) in California does not adequately address the need for additional investments in these modes.

Recent studies have shown that investments in active transportation can provide significant reductions in GHG emissions while providing enormous public health savings through chronic disease reduction. By investing cap-and-trade dollars in the Safe Routes to School and Bicycle Transportation Account within the first year of this program, California can help local jurisdictions implement the goals of AB 32 and SB 375.

We therefore recommend the following actions:

- Dedicate 15 percent of the cap-and-trade revenues set aside for transportation to active transportation projects in the FY 2013-2014 budget. As noted in the Draft Investment Plan, the Safe Routes to School program and the Bicycle Transportation Account are existing programs that achieve GHG reductions and would provide an excellent vehicle for these funds.
- Require Complete Streets elements in all transportation projects funded through cap-and-trade revenues. The Complete Streets Implementation Action Plan (2010) is noted in the Draft Implementation Plan as a strategy for reducing GHG emissions. Tying cap-and-trade revenues to the implementation of this plan will accelerate the policy changes Caltrans has achieved regarding Complete Streets.
- In accordance with SB 535, dedicate 25 percent of the funding allocated for active transportation for projects that benefit disadvantaged communities and 10 percent of the funds to projects located within disadvantaged communities. Disadvantaged communities often have limited mobility options and suffer a disproportionate number of bicycle and pedestrian injuries and fatalities. These communities also suffer from chronic health outcomes that active transportation can improve by increasing physical activity and reducing emissions.
- Determine an equitable strategy for allocating active transportation to rural counties and cities. Cities and counties with small populations do not receive adequate funding through population based funding allocations to construct large scale projects capable of producing measureable vehicle miles traveled (VMT) and GHG reductions.
- Allow active transportation and Complete Streets plans to be eligible for cap-and-trade funding used for planning efforts related to Sustainable Community Strategy implementation.
- Include first and last-mile projects that facilitate bicycle and pedestrian access to transit and rail as eligible for funding under the Rail Modernization program area. First and last-mile projects allow seamless connections to transit without the use of an automobile. Studies have been shown that these projects can enhance the GHG reductions achieved by transit.

Thank you for this opportunity to comment on the Draft Investment Plan. We look forward to working with CARB and the Department of Finance to ensure that California's cap-and-trade revenues are spent in a cost effective manner that increases bicycle and walking trips and reduces both VMT and GHG emissions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rye Baerg', with a stylized flourish extending to the right.

Rye Baerg  
Southern California Regional Policy Manager  
Safe Routes to School National Partnership