

November 1<sup>st</sup>, 2013

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

Re: Climate Change Scoping Plan, First Update

Dear Chairman Nichols and Board Members:

On behalf of the undersigned organizations, we thank you for all of your hard work to reduce greenhouse gas emissions and your strong commitment to thriving and sustainable communities. Since the passage of AB 32 and SB 375, the Air Resources Board has led the state and nation with its innovative planning and tools to address the challenges of global warming.

Transportation continues to be the largest contributor to greenhouse gas emissions, comprising 37 percent of emissions in California, so it is important for SB 375 to play a central role in this update. We applaud the draft update's call for investment in SB 375-related planning tools and in infill and transit-oriented housing affordable to low-wage workers and high-propensity transit riders. We also support the plan's call for funding and regulations that coordinate planning activities, increase active transportation investment, and improve access to clean passenger transportation. Investments in these types of strategies will result in reduced emissions and a healthier, more sustainable California.

However, meeting the ambitious 2050 emissions reduction target will call for steep reductions in every sector, and we are concerned that the current draft leaves greater reductions from SB 375 off the table. To ensure that the 2050 target is met, this update should call for ARB to regularly revisit the SB 375 regional GHG targets beyond 2010 and set cumulative emissions reduction targets for 2030 and 2050 for the SB 375-related sector that maximize GHG reductions and community benefits.

This draft update includes a section that ensures that disadvantaged communities, where transit ridership is the highest, reap the benefits of transit-oriented development. We are impressed with the inclusion of measures such as the development of metrics to identify the impacts and benefits of the climate change program, investment in capital investments and infrastructure, and the convening of the Environmental Justice Advisory Committee. These measures show that the Air Resources Board is serious in its desire to mitigate the effects of climate changes in these vulnerable communities.

Unfortunately, these communities also remain the victims of transit cuts, infrequent service, and fare hikes. While the draft update provides much needed support to these communities, it does not address improvements to transit operations. To ensure that these communities thrive and help California meet the reduction targets, the Scoping Plan update should prioritize investments that will restore and improve transit service in all communities, but particularly transit-dependent communities.

The update should also include support for electrification of transit infrastructure to ensure that buses and rail are able to draw power from low-carbon energy sources. In addition, the plan should support innovative practices from the emerging sharing economy, such as bike sharing and private ridesharing. These strategies have taken off with very little government support, and providing incentives to both expand these services and minimize their carbon emissions (for example, by providing tax breaks to replace older rideshare vehicles with plug-in hybrid models) will also help achieve the 2050 target.

We also recommend placing a greater emphasis on reducing VMT by increasing the investment in and access to active transportation. While vehicle and fuel innovations contribute to reducing emissions and air pollution, active transportation strategies such as walking and bicycling projects provide greater co-benefits, including reduced household transportation costs, increased levels of physical activity, decreased chronic disease outcomes, improved local economy, reduced energy costs, and improved safety for bicyclists and pedestrians. These co-benefits are critical to disadvantaged communities, where roadway safety risks, air pollution exposure, and inactivity-related chronic diseases tend to be greatest.

We are pleased to see that the update identifies VMT reductions gained from locating and preserving homes affordable to low-income households in transit-rich areas since these households ride transit the most. However, early research indicates that it is also beneficial to locate homes near jobs and services to reduce VMT in areas that are not served by high-frequency transit but where proximity of uses allows for walking, biking and shorter car trips. We encourage the update to support the recommendation of the Regional Targets Advisory Committee for MPOs to incorporate a Jobs Housing Fit measure into their modeling for future Sustainable Communities Strategies. The Jobs-Housing Fit measure encourages infill development to reduce VMT, while also protecting open spaces and maximizing healthy living choices for workers and residents in urban, suburban, and rural places.

Finally, conservation and preservation of our working and natural lands is vitally important to reduce emissions and provide many other public benefits that are critical to Californians. We appreciate the number of different actions this draft update includes that support the conservation of these resources and their climate benefits. We recommend a stronger emphasis and commitment in the Plan to climate strategies that integrate the conservation of working and natural lands with strategies aimed at reducing transportation-related emissions. Such efforts will not only optimize GHG reductions, but will promote many other public benefits as well. It would also enhance the benefits of other strategies mentioned in the document such as funding to the Williamson Act, urban forestry, and conservation easements. These integrated strategies will ensure that California's natural landscapes will be available to sequester carbon and provide vital ecosystem services for future generations.

In closing, we are grateful to the board and staff for your efforts to implement AB 32, which will continue to reduce emissions and ensure that future generations of Californians have cleaner air, healthier communities, and a stronger economy. We look forward to working with you to ensure that this first update will allow us to meet our targets for 2020 and 2050.

Sincerely,

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