AMERICAN LUNG ASSOCIATION®
IN CALIFORNIA

September 4, 2009

Mike McKeever and Members
Regional Targets Advisory Committee
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Re: Prioritization of Public Health in RTAC draft report

Dear Chairman McKeever and Regional Targets Advisory Committee members:

We appreciate the efforts of RTAC members and ARB staff to produce the August 28th draft report, and also appreciated the opportunity to provide comments at the September 1st meeting. As stated in the August 3rd Health Network for Clean Air letter to the RTAC, the American Lung Association and our colleagues in the public health community are very concerned about the air quality and public health impacts of land use and transportation planning and we believe the RTAC's recommendations are very important to spur improved effort at the local and regional level to reduce vehicle trips and related GHG emissions.

As work continues to revise the draft, we urge the RTAC to strengthen the report in the following ways (please find red-line edits attached):

1.) <u>Stronger Focus on Health Co-Benefits</u>

As noted in our comments at the meeting, ***we are very concerned that the many air quality, public health and other co-benefits of smart growth are segregated from key sections of the report***, particularly the section on target-setting. We strongly encourage the revised version of the report to reflect the importance of public health input and benefits throughout the entire SB375 process. The importance of achieving air quality and public health co-benefits should be integrated into the target-setting section of the report to ensure that safer, healthier, sustainable communities result from this effort.

a.) We appreciate the recommendation on page 41 and 42 that CARB identify, quantify and highlight, to the extent possible, the concepts presented in the co-benefits section of the draft report and make the advancement of co-benefits " a key goal" in the target setting process, however we don't see language to implement these recommendations in the report.

- **Page 8**: Include language in Step 3 of the Target Setting Process:
"In developing alternative scenarios, ARB staff and the MPO staffs shall identify and quantify to the extent feasible the public health co-benefits that could be achieved through greater emphasis on compact land use patterns, increased emphasis on biking, walking and transit and reduced VMT and identify pathways for incorporating and maximizing these benefits in the alternative scenarios."

b.) Additional recommendations to strengthen the focus on health co-benefits:

- **Page 32:** Under Modeling Improvements, the RTAC should include a goal for the development and adoption of models that can accurately estimate greenhouse gas, air quality and public health impacts of various planning scenarios. As stated on page 42 of the draft: "Promote the development and use of planning models that can accurately estimate the potential global warming and co-benefits of various land use scenarios in the development of the targets and the SCS."

- **Page 41:** Within the co-benefits section on Reduced Air and Water Pollution, we would recommend adding additional specifics related to the health effects of motor vehicle pollution, including research findings on increased asthma onset and prevalence near heavily traveled roadways, reduced lung function and development in children that experience elevated pollution levels, and pollution related increases in hospitalizations and premature deaths.

- **Page 43:** Reductions in VMT must be included as a primary factor on the lists of suggested performance indicators for land use, transportation, pricing and TDM/TSM.

2.) <u>Stronger Focus on Land Use Change</u>

- **Page 8:** Changing land use patterns to promote infill and more compact development patterns, reduce vehicle miles traveled and increase biking and walking options should be listed among the measures considered in Step 3 of the target setting process.

3.) <u>Increase Public Outreach Opportunities</u>

- **Page 10:** We encourage you to ensure that that public health input is included throughout the SB375 process, including the target-setting process. We recommend expanding public health outreach and specifying public health organizations as stakeholders under the ARB Stakeholder Process.

- Ensure adequate time for public input throughout the SB 375 process and as CARB develops recommendations for regional targets.

4.) <u>Incorporate a Uniform, Per Capita Reduction</u>

Following the discussion at the September 1st meeting, we believe that the target-setting and target-meeting approaches should include the following:

- The ARB should establish a uniform, statewide percent, per capita reduction in greenhouse gases and provide the MPOs with the opportunity to justify adjustments based on a reasonably difficult threshold for proving unique regional characteristics and be guided by the principles of ambitiously achievable targets.

- As stated at during the September 1st meeting, all regions will conduct modeling and all should have the ability to use best management practices to meet the targets. Therefore, while we understand that all regions have different modeling capabilities, we think it's important to not allow any regions to completely opt out of modeling and instead rely solely on best management practices. While the RTAC has not reached consensus on this matter, ***we believe that a hybrid/combination of the two provides the best option*** for pursuing regional targets by utilizing all options and with the greatest degree of accuracy.

Finally, we believe that all MPOs can foster growth that reduces greenhouse gases, reduces driving, increases daily physical activity through active transit options like biking and walking will, combats California's worst-in-the-nation air quality, improves public health by reducing chronic illness, and ensures we can better cope with a changing climate.

We thank you again and look forward to continuing to assist both this committee and the ARB in ensuring that public health protections and benefits are considered in all aspects of California's greenhouse gas reduction strategies.

Sincerely,

Bonnie Holmes-Gen
Senior Policy Director

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RTAC Guiding Principles

To help frame the context in which it would proceed throughout its meetings, the ~~Committee established a set of guiding principles at its March 4, 2009 meeting. The~~ Committee agreed to the following principles:

- Minimize administrative burden in program implementation or tracking;
- Encourage regional and sub-regional cooperation rather than competition;
- Avoid conflicting statutory requirements, if any;
- Maximize integrated system-approach allowable under the law;
- Maximize co-benefits of air quality and public health, mobility, and economic growth;
- Maximize transparency and clarity to gain public support;
- Use metrics that measure cost-effectiveness.

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Step 3 ARB staff and MPO staff would next develop parameters for preparation of alternative scenarios to test the effectiveness of various approaches for the 2020 and 2035 target years that would lead to more ambitious GHG reductions in those years as compared to the baseline results. The measures to be incorporated into these alternative scenarios may include:

- Increased transportation funding and system investments in modes that will reduce GHG emissions, such as public transit, rail transportation, non-motorized transportation, and the like
- Shifts towards better land use / transportation integration, through means such as funding for supportive local infrastructure near public transit (e.g., smart growth incentive programs), and funding for regionally coordinated preservation of natural areas
- Shifts in land use patterns that emphasize infill, more compact development patterns, reduced vehicle miles traveled (VMT) and increase walking and biking trips
- Increased the use of transportation demand management measures to reduce single-occupant vehicle (SOV) travel demand
- Increased transportation systems management measures that will improve system efficiency
- Various pricing options, including but not limited to express lanes, parking, and various fuel taxes
- Acceleration of more fuel efficient/clean fuels autos into the fleet mix

In identifying the measures to be used in developing these alternative scenarios, MPO staffs and ARB staff will use information from existing scenario assessments and cost-effectiveness studies wherever possible.

In developing alternative scenarios, ARB staff and the MPO staffs shall identify and quantify to the extent feasible the public health co-benefits that could be achieved through greater emphasis on compact land use patterns, increased emphasis on biking, walking and transit and reduced VMT and identify pathways for incorporating and maximizing these benefits in the alternative scenarios.

In this step, the MPO staffs and ARB staff would also determine the outputs that should be obtained (from existing scenario assessments or new assessments derived with existing travel demand models, off-model tools or with sketch planning analyses), which may include:

- GHG levels at target years
- Vehicle Miles Traveled
- Transportation performance measures
- Economic performance measures
- Other environmental performance measures
- Social equity performance measures

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1. ARB Stakeholder Process

The Committee recommends that ARB continue to provide opportunities for involvement by a wide variety of stakeholders, including but not limited to local governments; transportation agencies; homebuilders; academia and environmental, public health, planning, affordable housing and environmental justice organizations. A high level of transparency and outreach is key to the successful implementation of SB 375. Opportunities for stakeholder participation in the target setting process is essential to build public confidence. In addition to public meetings through out the target setting process, ARB should continue to encourage the submittal of data and written comments through ARB's online public comment website. The comment website serves as a mechanism for: (1) soliciting public input and (2) developing a statewide repository for information on local policies and practices that reduce greenhouse gas emissions and support the goal of sustainable community design.

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1. Modeling Improvements

- State support in obtaining funding for MPOs to develop and implement enhanced models, including activity-based model, land use model, 4-D models, ~~and~~ advanced air quality modeling tools and other modeling tools that can accurately estimate the potential greenhouse gas and public health co-benefits of various land use scenarios.
- State support for standardizing modeling assumptions such as consistent methodologies for estimating gasoline price and fuel efficiencies.
- Conduct a Statewide Year 2010 Household Travel Survey to support development of enhanced modeling tools. The survey needs to be comprehensive and of sufficient detail for MPOs to develop/enhance Regional Models (including Activity-Based Models). A focused statewide approach towards household surveys will not only benefit all MPOs from the economy of scale (larger sample size at lower cost) but will also elevate the expertise and survey quality.
- State support for an integrated Statewide travel demand and land use model to address inter-regional travel and provide a platform for MPO model enhancement and collaboration.
- State support to develop and automate a statewide data system to support both the State's and MPOs' modeling efforts. Example - Enhanced VMT forecasting tools and supporting data, HPMS, and enhanced traffic count program.
- State support for a state body to facilitate the development of travel demand model development guidelines and model validation standards for use by California MPOs. In addition, the body would develop a set of evaluation criteria to enhance the Model Peer Review process.

State support for establishing a statewide metropolitan cooperative research program. Large costs are involved in both improving current and developing more advanced models. Rather than having these costs duplicated at each MPO, it would be beneficial to pool resources for such activities as enhancements of existing

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PRIVATE & PROFESSIONAL ~~ASSOCIAITONS~~ ASSOCIATIONS

- Urban Land Institute
- Clean Air Coalition
- American Lung Association in California
- Environmental Defense Fund
- Business Councils
- Real Estate Professionals Organization
- American Planning Association

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PAGE 41

1. Reduced Air and Water Pollution

- Less Air Pollution – Reducing the number and length of car and truck trips means less pollution that directly or indirectly creates summertime smog and particulate pollution. Harmful pollution that ~~can~~ research has shown to increase asthma onset and prevalence

near heavily traveled roads, reduce lung function in children that experience elevated pollution levels, increase hospitalizations and premature deaths, cause cancer and other health problems are greatly reduced.

- Improved Water Supply and Quality – Compact development can reduce water use and put less strain on sewer systems. Water quality can also be improved because run off can be filtered by natural lands instead of paved surfaces.

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Performance Indicators

To ensure that SB 375 implementation results in the level of land use and transportation changes needed to achieve our state's emission reduction goals, the Committee recommends that a standard set of performance indicators be developed for the state's use in evaluating whether a given MPO's SCS/APS plan is likely to meet its target, as well as for establishing the basis for a monitoring system that would track MPO plan performance over time.

This set of performance indicators should be developed such that they balance the need for comprehensiveness in measuring the impacts of land use, transportation, pricing, TDM/TSM, and any other MPO plan policies, but also recognize the ability of MPOs to collect and provide the requested data. Below are examples of performance indicators that should be considered for these purposes:

Land Use:
- Land use distribution
- Development density
- Land use mix
- Urban design/pedestrian environment
- Vehicle Miles Traveled
- Destination accessibility
- Average residential densities
- Average residential + employment densities
- Housing product mix (% of new dwellings (attached, small lot detached, and large lot detached)
- Land use mix (% of new development infill, redevelopment, Greenfield)
- Housing units within X distance of transit with Y service

Transportation:
-Vehicle Miles Traveled
- Average cost of transit fares
- Number of lane miles
- Centerline miles per square mile (to analyze walkable street patterns)
- % of non-highway roads with sidewalks
- % of non-highway roads with bike lanes

9.4.05 American Lung Association in California suggested revisions
Draft RTAC report 8/28/09

- Funding priorities (% of funding for new capacity projects, for transit projects, for road maintenance, for transit operations, for non-motorized transportation, other)
- Mode split (% trips auto, transit, bike, walk)
- Speed-related impacts (% of VMT at different speeds)