



SONOMA COUNTY TRANSPORTATION & LAND USE COALITION

December 10, 2008

Mary Nichols  
Chair, California Air Resources Board  
Sacramento, CA 95814

RE: AB 32 Scoping Plan

Dear Chairman Nichols:

On behalf of Sonoma County Transportation & Land Use Coalition, I would like to express our appreciation for the opportunity to comment on the California Air Resources Board's Proposed Scoping Plan for AB 32. While there is much that is commendable about this plan, we believe that it is essential that the plan be strengthened in order to be effective. In this regard, we are particularly concerned that the land use and transportation targets be revised upward from 5 MMT to between 11-14 MMT.

Supporting the feasibility of this revised target, a study by Stanford University's Jim Sweeney indicates that regions around California have already adopted plans that will reduce GHGs by 7.1 MMT by 2020. Furthermore, a September 2008 study by Dr. Reid Ewing and Dr. Arthur C. Nelson, (authors of 'Growing Cooler') indicates a target of 11-14 MMT a year is achievable with policies California is already contemplating.

Setting a higher target will signal that the land use sector is a top priority and that regions should aim high and take decisive action to reduce greenhouse gas emissions from new development. It will also signal to the state of California that land use should be a high priority for financial and technical assistance to meet the goals of AB 32. Conversely, a low target will send the signal that business-as-usual development should continue, and that land use is not a high priority for resources and support.

Finally, a higher target must be coupled with a commitment to providing financial resources, technical assistance, and other support to help regions, local governments, and transportation agencies achieve the target.

We would also like to express support for the more detailed comment letter submitted by ClimatePlan.

Sincerely,

A handwritten signature in black ink that reads "Willard Richards". The script is fluid and cursive, with the first name "Willard" being more prominent and the last name "Richards" following in a similar style.

Willard Richards  
Chair