



December 5, 2008

Mary Nichols  
Chair, California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

Re: AB 32 Proposed Scoping Plan Comments

Dear Chair Nichols:

SUSAN GORIN Mayor Thank you for the opportunity to comment on the California Air Resources Board's AB 32 Proposed Scoping Plan and for helping transform California into a sustainable place to live and work. The City of Santa Rosa is committed to reducing Greenhouse Gases and has taken specific steps towards fulfilling those goals in the following ways:

MARSHA VAS DUPRE Vice Mayor

JANE BENDER  
VERONICA JACOBI  
ERNESTO OLIVARES  
JOHN SAWYER  
GARY WYSOCKY

**Policies:**

- Council Resolution No. 26341- Greenhouse Gas (GHG) emission reduction target of 20% from 2000 levels by 2010 and a goal to help facilitate the community-wide GHG emission reduction target of 25% from 1990 levels by 2015 for the City of Santa Rosa
- Regional Climate Protection Coordination Plan (RCPCP)
- Station Area Plan and Priority Development Areas-Higher density around transit services
- Bicycle and Pedestrian Master Plan Update
- General Plan update-Includes GHG reduction language
- Build it Green and LEED Programs for development
- Community Climate Action Plan-Climate protection Campaign

**Projects:**

- ICLEI software-GHG data gathered locally
- GHG Work Group-Interdepartmental expertise on GHG issues
- Fleet Conversion-City vehicle and bus fleet upgrades to hybrid/electric
- Sustainable City construction practices
- California Environmental Quality Act review-Includes GHG analysis for current development projects
- *Free Ride Program* from Transit-Includes Guaranteed Ride Home Program
- Transit expansion and enhanced bus services
- City renewable energy projects

The City of Santa Rosa would appreciate your consideration of the following items when amending the AB 32 Proposed Scoping Plan document:

**1. Increased GHG Reduction Targets**—California’s cities would benefit from having specific targets in the AB 32 Proposed Scoping Plan and guidance on the issue of funding for local government programs in order to meet these targets. We recommend stronger statewide targets to reduce emissions from vehicle miles traveled (VMT).

**2. Comprehensive Options for GHG Reductions**—Long-term solutions in the Proposed Scoping Plan inherently rely on reducing existing GHG’s from both the built environment and the transportation sector. GHG reduction targets cannot be met through sustainable new construction or future land use and transportation decisions alone. The Scoping Plan lacks discussion of innovative measures such as retrofit programs for existing commercial/residential structures or a discussion of pricing incentives to encourage modal shifts away from single occupant vehicles (parking pricing, toll roads, fuel taxes, and transit subsidies).

**3. Funding Mechanisms**—The City of Santa Rosa is striving to reduce its own carbon footprint and modify land uses that encourage multi-modal travel. At the same time, the city is struggling to find<sup>1</sup> funding to maintain existing transit service levels while planning for future service enhancements. Additional State Transit Account funding reductions, with Santa Rosa CityBus reaching its all-time ridership record during the month of October 2008, would be counter the AB 32 goals being promoted.

State funding programs for transit and redevelopment activities could be connected to the efforts of local agencies towards long term reduction of GHG emissions. Transit operators could become targeted recipients of any future carbon trade or “cap and dividend” markets. Maintaining existing transit service, enhancing mass transit capacity, and the need for coordination of transit service with local land use decisions should be a part of the scoping plan. The “land use patterns that support these low-carbon modes of travel” (p. 48) will require additional revenue sources to fund the necessary infrastructure: sewer and water pipes, new fire equipment, schools, parks, sidewalks, stormwater facilities, etc. Please provide clarification as to the source of funds for these additional costs.

While there is ambiguous mention of “carbon fees,” all options for increasing revenues should be explored, including a feasibility study of raising the state fuel tax. The state should revisit raising the fuel tax in order to both reduce GHG’s and create a sustainable funding source for enhancing transit, bicycle and pedestrian infrastructure while encouraging the reduction of vehicle miles traveled.

We encourage you to include increased GHG reduction targets, suggestions to address GHG reduction from the built environment, and sustainable funding sources that encourage modal shifts in the

revisions to the AB 32 Proposed Scoping Plan.

Thank you again for the opportunity to comment on the AB 32 Proposed Scoping Plan. Santa Rosa looks forward to working alongside the State of California in leading the nation to reduce GHG emissions and we thank you for any tools created to aid us in our collective efforts. Please feel free to contact Peter Brown, Senior Planner, with any further questions at (707) 543-3257.

Sincerely,

A handwritten signature in cursive script that reads "Susan Gorin".

SUSAN GORIN

Mayor

SG/saa