

November 19, 2008

Ms. Mary Nichols
Chair, California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95814

RE: California Park & Recreation Society & the California Bicycle Coalition Comments on Air Resources Board Proposed Scoping Plan

Dear Chairman Nichols:

On behalf of the following clients, (The California Park & Recreation Society, The California Bicycle Coalition) I wish to submit the following comments to include as part of the public record relative to the proposed AB 32 Scoping Plan. While I applaud the depth and thoughtfulness that went into the plan, I want to encourage the California Air Resources Board (CARB) to amplify on and look to more innovative solutions relative to the provisions contained in Sections IIC16 "Sustainable Forests"; IIB "The Role of Local Government: Essential Partners" and IIIF2 "Mobility and Shifts in Lands Use Patterns to maximize greenhouse gas emission reduction possibilities. First, it is widely acknowledged throughout this document that forested lands represent a "carbon sink." However, there is little mention of improved parklands be they urban, suburban or rural, all of which foster the same benefits. Vacant lands on the urban fringe currently zoned for residential or commercial activity inherently present a potential net increase in carbon production. CARB should provide incentives and develop mechanisms to encourage the development of a credit program wherein entities (public or private) acquire and rezone such lands for agricultural, open-space or park purposes thus avoiding the potential carbon emission increases. Second, existing urban hardscape environments create "heat islands" that also contributed to California's net carbon inventory. CARB should design a credit program to incent the conversion of such hardscape environments into carbon sinks through public/private partnerships. Both of these scenarios will generate credits that can be banked or sold and local land use entities will move closer to meeting their carbon emission reduction goals. Additionally, though this may be difficult to quantify, we would encourage CARB staff to create a credit program for voluntary expenditures on bicycle and other non-motorized transportation facility improvements by the private sector. The section of the plan entitled "Mobility and Shifts in Land Use Patterns" lauds the benefits of "walkable communities" but there is no reference to the benefits similarly found in cycling. Walking is excellent for shorter jaunts to

neighborhood dining and retail venues but given the comparative speed of travel cycling allows for expanded non-motorized opportunities, specifically work-related commuting. The physical development of our communities coupled with appropriate land use planning goals will be critical to achieving the goals envisioned in AB 32. Without the proper incentives and mechanisms in place to fully realize carbon reduction opportunities, California may fall short of the mark.

Thank you for the opportunity to comment. We look forward to working with CARB in the future. If you have any questions, please contact me at (916) 447-9884.

Sincerely,



Doug Houston
Legislative Advocate