



**ECOS**  
ENVIRONMENTAL  
♦ COUNCIL ♦  
OF SACRAMENTO

909 12th Street, Suite 100 • Sacramento, CA • 95814 • (916) 444-0022

December 3, 2008

Attn: Honorable Members of California Air Resources Board

Re: Increase Targeted GHG Emissions Reductions from "Smart Growth"

To Whom It May Concern:

The Environmental Council of Sacramento (ECOS) applauds California's efforts to reduce greenhouse gas (GHG) emissions. However, we remain extremely concerned that the AB 32 Scoping Plan in its current iteration fails to outline a sufficiently aggressive target for reducing GHG emissions via "smart growth" related changes in transportation and land use planning. ECOS feels strongly that the CA Air Resources Board (CARB) must increase the goal for GHG emissions reductions achieved via smart growth land use and transportation planning from the current proposed 5 Million Mega Tons (MMT) to somewhere in the range of 11-14 MMT per year.

A target of 11-14 MMT is achievable and would translate to a very modest reduction in driving by the year 2020 of less than four miles per day per licensed driver. If CARB sets a lower target (e.g., something in the range of 5 MMT), the result will be greatly expanded "greenfield" development and more road and highway expansions and new construction. This kind of business-as-usual approach to planning will make it impossible to reach the 2050 targets established by AB 32. For California to achieve the critical goals of AB 32, we must see reductions in vehicle miles traveled (VMT) of approximately 10% by 2020 and 20% by 2030. The current 5 MMT target equates to a 4% VMT reduction by 2020, less than half of what is needed.

In addition to setting a more aggressive target for GHG reductions, CARB should highlight the importance of prioritizing new and expanded funding for pedestrian, bike, and transit facilities. Getting Californians out of our cars will require a paradigm shift in transportation options and behaviors. This means "complete streets" throughout our urbanized areas and greatly expanded funding for transit operations and maintenance. The Scoping Plan needs to emphasize these priorities so that local governments will appropriately update and modify their plans and impose necessary requirements on new projects.

Finally, the Scoping Plan needs to address equity, environmental justice and public health. CARB should ensure that AB 32 implementation includes goals for improving public health and enhancing the equity of our metropolitan areas through smarter coordinated transportation and land use planning. Again, a clear signal from CARB will help spur local governments to better address these issues through local planning documents and project funding allocations.

Thank you for your attention. Please do not hesitate to contact us with any questions.

Sincerely,

Graham Brownstein  
Executive Director, ECOS