



To: CARB Staff
From: Justin Horner, Amanda Eaken, Simon Mui, and
Nick Zigelbaum, NRDC (jhorner@nrdc.org)
Re: Comments on Land Use and Local Government in
Draft Scoping Plan and Appendices
Date: August 1, 2008
Via: Electronic submission at
<http://www.arb.ca.gov/cc/scopingplan/spcomment.htm>

Land Use

NRDC believes that Land Use should be included as part of a comprehensive approach for achieving reductions in the transportation sector, so we have submitted the bulk of our substantive comments on Land Use with our Comments on Transportation. An approach that covers vehicles, fuels, and vehicle travel is the best strategy to ensure that the transportation sector achieves the necessary reductions to allow the state to meet its 2020 and 2050 emissions limits. NRDC supports an overall framework for the transportation sector that includes the following key design elements:

1. Requirements for each of the “three legs of the stool.” These include:
 - a. vehicles performance standards;
 - b. clean fuels standards, such as the low carbon fuel standard; and
 - c. standards and measures for VMT reduction.
2. A cap-and-trade program covering transportation fuels.

NRDC is very concerned that the Draft Scoping Plan’s low target of 2 MMTCO₂E for land use significantly underestimates the sector’s potential contribution to the state’s 2020 emissions limit, and will not get the state on the path needed for the deep emission reductions necessary by 2050. It is unclear how CARB arrived at this number.

We strongly urge CARB to put in place an aggressive and bold target for land use that will send a strong message to local and regional governments that business-as-usual land use is not acceptable and that we must start designing communities that provide a balance of transportation options and reduce the need to drive.

We suggest a restructuring of the Scoping Plan section pertaining to land use. The Draft Plan includes several policies –“under evaluation” including Pay-as-You-Drive Insurance and employer transportation demand management programs. We encourage

*NRDC Comments on Land Use and Local Government
in the Draft Scoping Plan and Appendices*

CARB to create a section in the Proposed Scoping Plan entitled, “Policies to Reduce Vehicle Miles Traveled.” This category would include the regional planning framework laid out in the Draft Plan, as well as supportive policies such as Pay-as-You-Drive Insurance, and aggressive investments in public transportation.

For more detail on the land use and other strategies we think should be pursued to achieve VMT reductions, please see our Comments on Transportation, submitted concurrently.

Local Government: Community Green Building

We urge CARB to add the bullet “Community Green Building” to its list of Local Government Actions on page 32. Even though the state is developing a statewide mandatory Green Building Code (see page 23 of the Draft Scoping Plan, and our comments on the topic submitted concurrently), there is still great potential for local authorities to go beyond state requirements and require even more efficient buildings and achieve even greater savings. At least 75 local authorities already have developed or are developing mandatory and voluntary green building codes.¹ CARB should call out the potential for local government action to achieve GHG savings and improve quality of life for their constituents.

¹ See http://www.builditgreen.org/taxonomy_menu/3/5/52/55