

September 3, 2008

The Honorable Arnold Schwarzenegger  
State Capitol Building  
Sacramento, CA 95814

Dear Governor Schwarzenegger,

As national organizations working to address global warming, we applaud your leadership on this issue. California has led the nation and set a strong example for federal policy in setting strong mandatory greenhouse gas emission caps. However, deficiencies in the latest AB 32 scoping plan within the land use and transportation component threaten the state's ability to meet its global warming goals and retain its national significance for the rest of the country. We are writing to urge you to increase the land use and transportation target to at least the 9 million metric tons by 2020, which was suggested in the state's 2006 Climate Action Team Report.

Advancing sensible growth patterns and investing in transportation choices that help reduce driving rates is essential in every state, not just to curtail global warming pollution, but to reduce our dependence on oil and help relieve the burden of high gas prices for citizens. In California, where 38 percent of the state's global warming pollution is from transportation and the state has the highest gas prices in the nation, a strong plan for more efficient, low-carbon land use and transportation that helps people drive less is even more important. Yet the latest AB 32 draft scoping plan reduced the role of smart land use from 9 MMT CO<sub>2</sub> to 2 MMT CO<sub>2</sub>, which represents only 1 percent of the emissions reductions in the plan overall. Reinforcing the inadequacy of this target, the Sacramento Council of Governments (SACOG) has set a goal of reducing global warming pollution from land use by 750,000 MT by 2020, thus achieving 40 percent of the statewide target even though the region represents only 6 percent of the state's population.

At 2 MMT CO<sub>2</sub>, AB 32's revised VMT reduction target is far too low and without change will have a no meaningful impact on slowing sprawl and providing alternatives to driving. Evidence around the country proves that smart growth and public transportation are a winning combination to reducing global warming pollution. In the San Francisco Bay Area, vehicle miles traveled for households living within ½ mile of transit stations are half that of families living in suburban locations more than 1-mile from rail or ferry stops. In Atlanta, Georgia, residents of Atlantic Station®, a 138-acre brownfield mixed-use redevelopment community, drive 8.6 miles a day, compared to an average of 32.4 miles a day for individuals residing in the 20-county surrounding area. By investing in greater public transportation within and between cities, as well as encouraging the development of mixed-use, walkable communities like Atlantic Station, California can make significant impacts on its own VMT and reduce global warming pollution from the

transportation sector.

In order to curtail the transportation sector's CO<sub>2</sub> through vehicle miles traveled (VMT) reduction, AB 32 should raise the land use and transportation target to at least 9 MMT by 2020 and include policies to help make California's communities more walkable, put more housing near job centers and services, and significantly boost investment in public transportation. Our country's growth patterns have been one of the biggest reasons that VMT has increased at three times the rate of population growth since 1980. By neglecting the opportunity to help California's communities grow more sustainably, the state is not only unlikely to meet its 2020 climate goals, but is also sabotaging future efforts to fight global warming.

The Energy Information Administration estimates that VMT rates will double nationwide by 2030. As a result, increased vehicle fuel economy standards and California's low-carbon fuel standard alone are not enough to reduce the transportation sector's ballooning CO<sub>2</sub> emissions. A recent analysis by the Center for Clean Air Policy shows that without change, projected VMT increases nationwide will wipe out the combined CO<sub>2</sub> reductions from both the higher CAFÉ standards passed in last year's energy bill and low carbon transportation fuel requirements. For these reasons, VMT reduction must be a central component of any comprehensive climate change legislation and it is all but missing from AB 32's scoping plan.

Creating walkable, bikeable, and transit-oriented communities is also important for addressing California's obesity and chronic illness rates. Almost one-third of American commuters who use public transit meet their daily requirement for physical activity (30 or more minutes per day) by walking as part of their daily routine, including to and from the transit stop. Better land use and transportation planning will improve air quality and physical activity levels, as well as reduce obesity-related illnesses such as diabetes and cardiovascular disease. By assigning a low target to the land use sector, the draft Scoping Plan missed a critical opportunity to improve the public's health.

Your leadership on global warming policy indicates that you have the foresight necessary to make AB 32 the most comprehensive and effective climate change strategy in the country. Since AB 32 will not only determine California's climate change future, but will also shape national policy, it is imperative that California get it right. We urge you to affirm the importance of smart growth and public transportation by strengthening AB 32 and raising the target for this sector.

Sincerely,

Bill Magavern  
Sierra Club

Colin Peppard  
Friends of the Earth

Geoffrey Anderson  
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John Norquist  
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cc: Cynthia Bryant, Office of Planning and Research  
California Air Resources Board