



EAST BAY BICYCLE COALITION

POST OFFICE BOX 1736 OAKLAND, CALIFORNIA 94604
FRUITVALE VILLAGE, 3301 EAST 12th ST, SUITE 143
www.ebbc.org (510) 533-RIDE

August 1, 2008

California Air Resources Board:

Members of the East Bay Bicycle Coalition (EBBC) strongly endorsed AB 32, the Global Warming Solutions Act, in 2006. We appreciate the efforts by the California Air Resources Board (CARB) to create and publically distribute the draft Scoping Plan. I personally appreciate the opportunity I had to attend the "Draft Scoping Plan Briefing" with Assemblywoman Loni Hancock on July 29, 2008. We believe that is realistic to reduce California's Greenhouse Gas Emissions (GHG) to 1990 levels by the year 2020. This goal of AB 32 is only a midway point on the path to a 2050 goal for much greater carbon reduction.

Our comments focus on the Transportation Sector. In the Bay Area, the transportation sector contributes 51% of the GHG, in comparison to the 38% figure cited in the Draft Scoping Plan for the State. The Bay Area's recently adopted Regional Transportation Plan also serves as a guide for the State to adopt more aggressive Land Use targets.

Overall, the Draft Scoping Plan over relies on unproven and questionable "efficiency measures" for transportation to propose GHG emission reductions. The political problems with the Pavley measures and numerous technological assumptions do not provide assurance that the AB 32 goals will be met.

At the briefing with Assemblywoman Hancock, there was **consensus that measures to address Vehicle Miles Traveled (VMT) will need to be adopted to meet AB 32 goals**. We urge that VMT reduction measures be explicitly included in the final Scoping Plan. For now, please include the additional measures under evaluation for transportation in the economic and public health benefit analyses that you are currently preparing. Future mobility that links transit, bicycling and walking needs to be promoted. Other countries are meeting similar goals set by AB 32 with mode-shift options. Californians deserve similar mobility opportunities.

We suggest two additional measures: **Safe Routes to Transit (SR2T)** and **Safe Routes to Schools (SRTS)**. Both programs have a proven track record in the Bay Area and are tools that CARB should adopt.

Bicycle and pedestrian access and safety, along with bicycle security are the primary components of **SR2T**. Promotion of SR2T represents a proven cost-effective way to reduce GHG while boosting public access to transit and encouraging healthy lifestyles. As well, increased transit ridership enhances the economic sustainability of transit operators by building farebox revenue.

Transportation to schools represents an ideal target for GHG reductions. Some 30% of trips are related to parents driving their children to school. **SRTS** furthermore imparts an enduring mode shift upon the next generation.

Sincerely,

Robert Raburn, PhD

Executive Director

TO PROMOTE BICYCLING AS AN EVERYDAY MEANS OF TRANSPORTATION AND RECREATION