



July 31, 2008

Ms. Mary Nichols
Chair, California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Higher Priority for VMT reduction in the AB 32 Scoping Plan

Dear Ms. Nichols,

As a nonprofit affordable housing developer, EAH Housing brings 40 years of experienced knowledge that when families can live near where they work, the community as a whole benefits. All of our newest properties are located in infill locations, most near transit centers, and we have calculated that one property alone saves 700 tons of CO₂ a year by allowing employed residents to shorten their commute.

We are writing to urge you to prioritize policies to reduce vehicle miles traveled (VMT) in the AB 32 Scoping Plan. A number of developers and environmentalists have found that a shared focus on infill, transit-oriented development has the potential for dramatically reducing VMT, and hence greenhouse gas emissions, through better land use planning. If done right, the AB32 Scoping Plan has the potential to significantly improve our ability to meet the increasing market demand for homes in walkable, mixed-use, mixed-income neighborhoods near transit options and job centers.

The inclusion of affordable housing is a crucial aspect in this model of new infill development. Tim Frank of the Sierra Club has said that “all affordable housing is green,” with an awareness that mixed-income communities help alleviate the traffic, congestion, and pollution that arise from commuting by those pushed to the margins. We have seen this in a number of communities where market rate infill development has both priced out working people and created more service jobs filled by people who cannot afford housing nearby.

The development community is ready to meet the market demand for infill development. But we face barriers: local governments need resources to plan and zone for climate-friendly development, and developers and local governments alike lack funding and financing options for building mixed-income infill developments and the infrastructure needed to support them.

The AB 32 Scoping Plan is a major opportunity to provide leadership and set policy direction not only to reduce greenhouse gas emissions, but also to meet Californians’ demands for relief from high gas prices through shorter commutes and affordable homes in walkable neighborhoods. Therefore, we urge you to:

1. Plan for higher CO₂ reductions from smart transportation and land use planning.
2. Focus state capital programs to provide funding to local

governments and developers that are planning for and building development that reduces VMT.

The Bay Area's Metropolitan Transportation Commission has adopted a target of reducing greenhouse gas emissions to 40% below 1990 levels by 2035 through land use and transportation planning. MTC has set a VMT reduction goal of a 10% per-capita decrease by 2035, compared to an anticipated increase of 10% if no action is taken. The state should match the leadership that is already happening throughout the state by making VMT reduction a significant part of California's climate strategy and providing the resources needed to make it happen. Models for these actions can be found around the state, and those that maintain a commitment to including households of all incomes in the planning stages hold the most potential for everybody's future.

Sincerely,

Judy Binsacca
Chair, Board of Directors