

October 30, 2008

Dear Air Resources Board Members:

We thank you for your dedicated and tireless work in addressing the implementation of AB 32. We think this plan represents a critical milestone in addressing the overwhelming challenge of Global Climate Change.

We would like to submit the following suggestions on the scoping plan:

- While we appreciate CARB's inclusion of better community design in reducing VMT, the proposed emissions reduction target for land use and transportation (5MMT) is very low. Local governments can do much better, and with support from the State, we can do it much faster. We believe the target should be at between 11-14 MMT.
- As part of the development of their regional blueprints, MPOs should establish individual targets for cities and counties with input from the jurisdictions involved. Where there is no regional plan, cities and counties should establish their own targets.

These targets will help reach regional goals; and help local elected officials adopt progressive land use policies, and overcome vocal opposition to higher densities, narrow streets, and the multiple other land use measures that support walking, biking, and increase the accessibility of transit. In addition, targets will help local developers and builders know what is expected of them.

- We ask that the State provide financial support to local governments to improve the capacity of infrastructure in already developed areas and to upgrade general plans and zoning codes to support development patterns that reduce VMT.
- We support a mandatory statewide Indirect Source Rule with penalties for developers whose projected project emissions exceed local targets. The income from penalties should be passed on to cities and counties for use in updating planning documents and upgrading infrastructure.
- The scoping plan should make it a top priority to invest in and sustain public transportation.
- Other co-benefits of improved land use planning should be considered when calculating the benefits of better community design including improved public health, conservation of the forests and working landscapes that sequester carbon and provide local food, reduction of wildfire hazards, and preservation of community water supplies.

For instance, landscape irrigation currently accounts for 50 to 70% of the water used by individual households. More compact development will reduce the size of the landscaped area surrounding homes.

Fewer watersheds are covered over by development when land use patterns are more compact. Allowing the natural systems of undisturbed watersheds to purify our water significantly reduces the need for water treatment. These advantages should be reflected in calculating the GHG reduction emission potential of specific development proposals.

We appreciate the leadership you have taken in addressing the overwhelming threat of climate change and thank you for the opportunity to comment on the AB 32 scoping plan.

Sincerely,

City of Arcata, Alexandra Stillman, Vice Mayor

City of Benicia, Elizabeth Patterson, Mayor

City of Claremont, Peter Yao, Councilmember

City of Coalinga, Trish Hill, Mayor

City of Encinitas, Maggie Houlihn, Deputy Mayor

City of Fremont, Bob Wieckowski, Council Member

City of Hayward, Bill Quirk, Council Member

City of Hercules, Ed Balico, Council Member

City of Indio, Melanie Fesmire, Council Member

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City of Oakland, Nancy Nadel, Council Member

City of Placerville, Robby Colvin, Council Member

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City of Pleasanton, Matt Sullivan, Council Member

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City of Santa Monica, Pam O'Connor, Council Member
City of Santa Monica, Richard Bloom, Mayor Pro Tem
City of Santa Rosa, Jeffrey Kolin, City Manager
City of Santa Rosa, Veronica Jacobi, Council Member
City of St. Helena, Karen Scalabrini, Finance Director
City of Ukiah, Mari Rodin, Councilmember
City of Ventura, Brian Brennan, Council Member
City of Ventura, Rick Cole, City Manager
City of Watsonville, Antonio Rivas, Mayor Pro Tem
City of Winters, Michael Martin, Mayor Pro Tem
Claremont Redevelopment Agency, Christopher Veirs, Senior Redevelopment
Planner
County of Humboldt, John Woolley, Supervisor
County of Marin, Charles McGlashan, Supervisor
County of Marin, Steve Kinsey, Supervisor
County of Marin, Community Development Agency, Alex Hinds, Former Director
County of Mendocino, Kendall Smith, Supervisor
County of Napa, Brad Wagenknecht, Supervisor
County of Solano, Barbara Kondylis, Supervisor
County of Ventura, Kathy Long, Supervisor
Town of Loomis, Walt Scherer, Council Member
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Town of Windsor, Robin Goble, Vice Mayor
WCCTAC, City of El Cerrito, Janet Abelson, Council Member

Yuba County Water Agency, Hal Stocker, Director
Bay Area Economics, Janet Smith-Heimer, Managing Principal
Carville Sierra, Inc., Philip Carville, President
CA Healthy Cities and Communities, Center for Civic Partnerships, Joan Twiss,
Director
Crabtree Group, Inc., Paul Crabtree, Principal
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Jud Consultants, Eugene Jud, Transportation Planner
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Raimi and Associates, Aaron Welch, Planner
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Weaver Research & Consulting Group, Susan H. Weaver, President