

Individual/Group	Comments on LUSCAT Report
American Farmland Trust	<p>The Scoping Plan should reflect the state planning use priorities as set forth in AB 857, including promoting infill development and equity, protecting environmental and agricultural resources, and encouraging efficient development patterns.</p> <ul style="list-style-type: none"> <li>• Reference in full the historic objectives of the Blueprint planning grants, which include explicitly planning to avoid conversion of prime farmland.</li> <li>• Department of Conservation will be studying the greenhouse gas emissions associated with the conversion of agricultural land to urban uses. We would encourage consideration both of the direct and indirect emissions. Conserve agricultural land by minimizing its conversion to urban uses.</li> <li>• Develop model policies that local governments can adopt, and include mitigation penalties using low-density ratios or taxes on increased land values.</li> <li>• Reference and encourage work that CDFG is undertaking to develop a strategic plan for agriculture. This plan should explore opportunities for farmers and ranchers to supplement income from food production with additional returns from sustainable enterprises that conserve energy, generate alternative energy, sequester carbon and otherwise reduce or offset the impact of greenhouse gases.</li> <li>• Promote local food. Establish a system for tracking and measuring "food miles traveled" and, then explore ways in which the distance food commodities must be transported from producer to consumer could be reduced, and the GHG implications of the reduction.</li> </ul>
BART (San Francisco Bay Area Rapid Transit)	<ul style="list-style-type: none"> <li>• Providing sufficient <b>funding</b> is critical to emissions reductions from transportation sector. Recommends that transit would be an eligible recipient of <b>Cap and Trade</b> auction allocations, as in current Lieberman-Warner bill (S2191); supporters of transit and more compact development are advocating that the share be revised and expanded to include a 10 percent share for metropolitan accessibility (6 percent for transit, and 4 percent as incentives for supporting land use strategies). Increased land values in highly accessible locations (such as urban core, inner suburbs or regional transit nodes) could negatively impact low income residents. The State should consider strategies to address this impact.</li> <li>• Consider <b>transit investments</b> and implementation of compact land use strategies for eligibility as an offset provider under Cap and Trade.</li> <li>• Acknowledge temperature differences between coast/inland and consider land use and transportation investment strategies to mitigate as it pertains to additional energy needed for building heating and cooling requirements.</li> <li>• LUSCAT should identify key short-term issues in the state budget that would set the state down the wrong path on reducing emissions. State should avoid selling off state land such that it would encourage sprawl.</li> <li>• Transportation costs and accessibility have a role in determining <b>land values</b>. The state should investigate mechanisms for the public to capture a portion of this increase in land value that may arise, as it is the policy change which may lead to land value increase in certain strategic locations (e.g., AB 1221 (Ma), which seeks to direct the tax increment in a defined area near a transit node to pay for affordable housing and infrastructure in support of higher-intensity development). If this is what is referenced on p. 72, item 6.1., be more specific on the recommendation.</li> <li>• The State should analyze if there are any significant <b>carbon sequestration co-benefits</b> of preserving forest, agriculture lands, and open space by encouraging more compact development. If there are co-benefits, regions that preserve these natural features should be rewarded.</li> <li>• Pg. 79-80, consider a measure on regional accessibility via non-auto modes. One example of an accessibility performance measure, perhaps under Prosperity Indicators (or Transportation Choices), could be: X percent of population should have non-auto access within Y (60 ?) minute travel time to Z (500,000 ??) jobs.</li> <li>• The State could also consider stronger policy links to existing <b>fund sources</b>; policies should promote appropriate land use decisions by local jurisdictions; reference BART's system extension policy, or MTC's Transit Oriented Development Policy for transit extensions.</li> <li>• The State should assess opportunities to align existing state resources (including education funds) more systematically to achieve key state goals, such as reducing GHG emissions and moderating VMT growth.</li> <li>• Editing comments: The overall report is extremely dense, long on background, short on specifics, and could use some</li> </ul>

	<p>additional editing. One suggestion is to recast the report as more of an overview of topics and responsibilities using bullets as frequently as possible. Details could be shifted to an appendix. For example:</p> <p>Planning to Reduce GHG Emissions:</p> <ul style="list-style-type: none"> <li>o All levels of government need to refocus their efforts</li> <li>o Greater Coordination is needed</li> <li>o Cannot lose sight of need to address resource conservation, improved health, affordable housing and better access to services and recreation</li> </ul> <ul style="list-style-type: none"> <li>• Pg. 64 – Transportation (4.4.3), under transit considerations. Replace 1<sup>st</sup> statement with “Research land use, site design, parking and other transportation demand management strategies and policies that would enable transit, walking and bicycling to be more competitive in suburban centers, and identify best practices to reduce transportation emissions in these important regional destinations. As applicable,, revise state policies to ensure state and regional transportation and land use investments are consistent with best practices.”</li> <li>• Pg. 65, under transit considerations, for 3<sup>rd</sup> bullet, remove (including ‘BART’) as “public transit” is already included in the statement</li> <li>• Pg 63, LEM, reexamine this suggestion. Not aware of any success from LEM, despite it being around for 10 years</li> <li>• Pg 72, item 6.2, Oakland’s S-15 Overlay Zone, requiring only 0.5 parking spaces per unit, is good example to promote. What about zoning changes to promote infill?</li> <li>• Item 6.3 – “streamline local approval processes and improve CEQA.” Specific? Incentives?</li> <li>• Item 6.4, what criteria would be followed? Improve modeling to what end? What type of improvements is needed?</li> <li>• Item 6.4, Loan fund? How repaid? Why not grants?</li> <li>• Pg. 73, What about reducing employer-provided parking, not just cash out? Enabling cities within corridors to share tax revenue such that land use decisions promoting transit are made on a corridor basis (per Will Fleissig)?</li> </ul>
CAPCOA	<p>Provides comments in the following areas:</p> <ul style="list-style-type: none"> <li>• <b>GHG reduction targets</b> should be based on an equitable distribution of reductions needed from all emission sectors; be technically and economically feasible to achieve; factor the level and location of different types of residential, commercial and industrial development expected to occur over the next several decades into the equation used to establish specific targets for each region; local governments should incorporate climate action plans into their general plan updates that are consistent with the regional targets; and through the budget process, the State should develop mechanisms to incentivize compliance with regional GHG targets and establish criteria for rewarding enhanced progress toward achieving the targets</li> <li>• <b>Adequate guidance and effective tools</b>, such as GHG quantification protocols and best practices for GHG reductions, are essential for helping regions to achieve GHG reduction targets. Guidance on projects subject to CEQA is critical for developers and local government to understand the role and requirements for new development in meeting regional GHG targets. Local implementation of a statewide threshold should be closely linked to achieving regional GHG reduction targets</li> <li>• The Scoping Plan should require <b>State</b> agencies to be responsible for achieving GHG reduction targets for <b>infrastructure and facilities</b> they control and manage. State agencies should implement projects to demonstrate leadership and serve as models for local governments and businesses.</li> <li>• The Scoping Plan should establish a process to <b>identify and remove barriers</b> to GHG-efficient and use development, while avoiding the potential to negatively impact public health (e.g. – allowing the siting of a toxic emission source near residential development or other sensitive receptors).</li> <li>• <b>EJ</b> should be a fundamental element of the land use strategies advanced under AB 32; look for opportunities to dedicate funds to mitigating impacts on these communities</li> </ul>
CSAC	<p>The California State Association of Counties supports the development of voluntary regional GHG emissions reductions targets that are developed cooperatively between the State, regional, and local governments.</p> <ul style="list-style-type: none"> <li>• While we understand the focus on supporting various transportation alternatives to the vehicle as a means for GHG emissions reductions, we also stress the importance of supporting an increase in funding for the preservation of the existing transportation system, especially local streets and roads, as this</li> </ul>

	<p>system serves as the transit right-of-way and is critical to a seamless, efficient, multi-modal transportation system.</p> <ul style="list-style-type: none"> <li>• Also, provide financial incentives for rural sustainability. While the Draft Submission lends support to incentives for better planning policies and critical recourse land protection, it does not recognize that counties must remain whole for the important purpose of service delivery. CSAC advocates that any new GHG emissions reductions strategies that focus on city-oriented growth and require conservation of critical resource and agricultural lands within the unincorporated area should include a mechanism to compensate county governments for the loss of property taxes and other fees and taxes so that counties can continue to provide the necessary services to all countywide area residents.</li> <li>• Further, as we discuss future funding options (congestion pricing, gas taxes, mitigation fees, etc.) we must consider the current systems that are severely underfunded and dependent upon some of these revenue streams for critical preservation and safety needs.</li> <li>• CSAC is concerned about the suggested need for legislation regarding waste diversion goals. While we agree that there is a need to address the future direction of the State's diversion program, we do not agree that the first step should be a higher diversion goal. Instead, other changes that would address existing problems associated with the California Waste Management Act's implementation should be fully vetted and in place before mandating a higher diversion goal. Such changes would include eliminating some of the Act's existing restrictions on what counts towards diversion; providing for "real" consumer and manufacturer responsibility; placing more emphasis on program implementation and less so on numeric compliance.</li> <li>• The final submission should recognize that many local agencies are in the process of developing, or have already initiated climate change-related programs. CSAC supports the inclusion of these programs into the larger GHG reduction framework and supports acknowledgement and credit given for these local efforts.</li> </ul>
<p>CTA (California Transit Association)</p>	<p>CTA recommends that the <b>promotion of public transit</b> as a significant way to reduce VMT be a prominent component in the LUSCAT report.</p> <ul style="list-style-type: none"> <li>• Pg. 64. CTA supports research into the adoption of policies which increase and facilitate transit capacity <i>between</i> suburban areas and city centers</li> <li>• Include advice that regional and local government coordinate land use planning in order to maximize existing transit service and to encourage more investment in public transit as a way to achieve regional emission targets</li> <li>• Pg. 64-65, State should consider increasing the availability of transit opportunities through the following strategies: <ul style="list-style-type: none"> <li>○ Fund transit oriented development planning and public involvement.</li> <li>○ Fund bicycle facility and route improvements, particularly to improve last-mile-to-transit access to bicycle riders.</li> <li>○ Provide funding for incentives to lower transit pass costs to increase ridership</li> <li>○ Increase the pool of funds available for transit projects, and in particular for extending existing transit systems.</li> <li>○ Make funding available for capital investments and operations for feeder service to make the last mile connection to transit.</li> <li>○ Promote programs that reduce driving and congestion while promoting healthy physical activity and connecting interested residents with information and incentives to add more walking, bicycle riding, public transit (including BART), and carpooling</li> <li>○ Make additional investments by the state into modernizing transit facilities, vehicles, systems and track ways to expand capacity and retain current ridership.</li> <li>○ Examine how support for transit could take into account the costs of transit system[s]' shift to clean fuels and efficient vehicles.</li> </ul> </li> <li>• Greatly increased funding to transit is the most important strategy that the ARB can include in its scoping plan.</li> <li>• Emphasize 'greening" of public transit.</li> <li>• Use cap and trade auction dollars for transit funding; Lieberman-Warner Climate Security Act (S. 2191) allocates revenue from emission allowances directly for public transit investment</li> </ul>

<p>California Building Industry Association</p>	<p>CBIA endorses the Regional Blueprint planning process as a core strategy.</p> <ul style="list-style-type: none"> <li>● LUSCAT recommendation that “High Transportation Carbon Footprint Development” should be mitigated through the adoption of a statewide <b>indirect source rule</b> (Section 4.4.6) ignores factors considered under a regional planning approach where such development may be close to transit options, within a regional preferred growth area and close to amenities such as schools, retail and suburban employment centers.</li> <li>● Supports LUSCAT recommendation in Section 3.4 on “<b>Reducing Barriers</b> to Efficient Land-Use Development.” Include the priorities identified in H-S “Section 6: Create Opportunities for GHG Efficient Land Use Development: <ul style="list-style-type: none"> <li>○ OPR should convene a multi-agency advisory group to examine ways to improve land use coordination and goal attainment (Strategic Growth Council);</li> <li>○ CEQA should be revised to support greenhouse gas efficient growth;</li> <li>○ Local governments whose general plans are consistent with a regional blueprint that produces GHG reductions beyond “business as usual” should not have to evaluate greenhouse gas in their general plan CEQA documents</li> <li>○ Projects that are consistent with general plans that are consistent with regional blueprints that achieve GHG reductions should not have to evaluate greenhouse gas impacts in their CEQA documents;</li> <li>○ State technical, fiscal and regulatory programs should provide priority consideration to regional and local priority planning projects as identified through a Blueprint.”</li> </ul> </li> <li>● Include the role of California’s <b>existing housing stock</b>; final LUSCAT submission needs strategies and programs to reduce the carbon footprint of existing residents and settlements</li> </ul>
<p>California Food and Justice Coalition</p>	<p>The production, distribution and access to food within a community must be integrated in to land use planning and be included when developing land use recommendations to reduce GHG emissions. Non-local food distribution increases emissions and affects low-income communities (e.g., Ports of Oakland, Long Beach). References NRDC study that found that 250,000 tons of global warming gases released were attributable to food imports, resulting in significant health impacts.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>● Promote wherever possible measures that preserve and expands land for <b>sustainable food production</b> geared towards feeding nearby populations, with special priority on farmland preservation that is connected to production methods that reduce carbon emissions (using a life cycle analysis), and farmland accessible to EJ communities.</li> <li>● Support investment in regionally oriented <b>food systems infrastructure</b> (packing, processing, distribution and retail) that increases consumer and institutional access to healthy locally grown food.</li> </ul> <p>Possible strategies:</p> <ul style="list-style-type: none"> <li>● Review and where possible implement local and state tax policy to identify and create mechanisms for encouraging farmers to grow sustainable food for local markets, and distributors and retailers to buy locally</li> <li>● Incent the preservation and expansion of land for food production, and disincen the conversion of agricultural land to low-density housing.</li> <li>● Department of Conservation to provide tax incentives to land users and land holders who are generating sustainable food production for local markets.</li> <li>● Integrate food sector issues into all support state agencies provide to local and regional governments to develop carbon reduction strategies, including developing simple, low-cost, efficient carbon monitoring systems that are accessible for both small and big governments and businesses and prioritizing the implementation of peer-reviewed scientifically-based strategies that are known to reduce carbon.</li> <li>● Support the integration of all food system planning into all local general plans, regional blueprints and similar regional land use, climate change response and planning tools.</li> <li>● Provide permitting easements, support and incentives to farmers who invest in alternative energy generation on their land, such as wind and solar.</li> <li>● Coordinate and build upon the variety of Federal and State funding available for food system reform to ensure that efforts complement and support each other.</li> <li>● Promote regional food processing and distribution in industrial center planning to avoid food traveling around the state or country for processing before arriving back to the region of origin for purchase by consumers</li> </ul>

	<ul style="list-style-type: none"> <li>• Promote cities developing policies that remove barriers and incentivize community-driven food production for local consumption on public land, particularly urban land, including green ways, utility and, parks and other underutilized public land.</li> <li>• DOC to develop a program to measure “Food Miles” for use by cities to measure the impact of increasing the purchase of local foods by institutions and consumers.</li> <li>• Use “food miles” calculator to protect agricultural land based on an accounting of potential transportation-related carbon emission reductions by growing food near population centers.</li> <li>• Require government facilities to develop and implement plans to source farm products from local or regional farms.</li> </ul>
Center for Biological Diversity	<p>Comments:</p> <ul style="list-style-type: none"> <li>• The 6-day public comment period for this report is inadequate, particularly given report was sent to ARB April 4</li> <li>• The report seems deliberately <b>lacking in specific, concrete measures</b> or even providing examples to clarify the scope or form of such measures (e.g., Chapter 4 “Sector Strategies”, On pages 60 and 61, “LUSCAT recommends the State consider the appropriateness of the following strategies...Consider developing a package of programs and resources targeted at rural community assistance.”). ARB staff have implied that they are considering concrete proposals for quantitative reductions from the land use sector</li> <li>• The report fails to adequately explain its comments regarding <b>CEQA</b>; worst of these is on page 38, “The inappropriate use of the CEQA process thwarts more than facilitates residential infill development.” Impugns CEQA rather than suggesting measures to overcome obstacles. Greenbelt Alliance paper provides a specific measure for addressing infill issues, “However, CEQA exists for a good reason—to help protect the environment—and if used well does not need to impede infill development projects. One way cities can help defuse the risk of CEQA lawsuits is to prepare “tiered EIRs” on Specific Area Plans. Such an EIR anticipates the problems that would result from certain types and intensities of development, lifts the burden of environmental review from individual projects, and helps address the cumulative effects of multiple projects in geographic proximity.”</li> <li>• Need more examples of specific measures to <b>encourage and facilitate infill</b>; Provides info from Chapters 8 and 9 of Greenbelt Alliance: “1. Set a time limit on permit processing, requiring staffs to process applications within a set period of time. 2. Assign specific staff to shepherd each infill project through the approvals process. Conduct staff and commissioner training to be sure everyone is up-to-date on guidelines, requirements, and procedures. 3. Carry out pre-application reviews with developers concerning potential projects. 4. Adopt clear procedures for review, to eliminate uncertainty about what both the city and developers should expect. 5. Establish “as-of-right” zoning under which developers that meet zoning requirements are allowed to build without lengthy hearings to obtain a conditional use permit or a general plan amendment. 6. Reduce environmental review requirements for individual infill projects by preparing EIRs on Specific Plans for infill areas. 7. Reduce design review uncertainties by establishing clear urban design guidelines, again often in conjunction with Specific Plans, that can let developers, neighbors, planners, and design review committees know what features are expected.”</li> <li>• Section 9: Working Constructively with Neighbors (page 39) offers the following specific measures: “1. Require developers to meet with neighbors before submitting plans for a project. Often designs can be changed to meet neighbor concerns, and neighbors later do not feel like they’ve been “blindsided” with the development proposal. 2. Prepare Specific Plans in which residents have an opportunity to prepare a vision for their community and influence design guidelines for infill development. 3. Organize small meetings between developers and key neighborhood leaders to develop buy-in before holding general public meetings or workshops. 4. Encourage community development corporations (CDCs), which have a strong neighborhood base, to undertake infill development. 5. Promote intensive infill development on sites with few neighbors nearby, such as former industrial areas, downtown parcels, or along arterial strips. 6. Ensure that infill development provides attractive new amenities for a neighborhood, such as shops, cafes, restaurants, dry cleaners, child care centers, parks, community gardens, restored ecological features, pedestrian friendly street designs, and attractive public spaces. Neighbors may then be less likely to oppose infill.”</li> </ul>
ClimatePlan	<p>ClimatePlan supports the overall approach to land use-related GHG emissions spelled out in both the LUSCAT Report and the Haagren-Smit Declaration:</p> <ul style="list-style-type: none"> <li>• Foster regional collaboration to achieve reductions in GHGs related to land use and transportation.</li> </ul>

	<ul style="list-style-type: none"> <li>• Support the assignment of regional land use-related GHG reduction targets to the regions, when coupled with mechanisms to help local governments achieve the targets.</li> <li>• Support a prominent role for the State of California in the area of technical assistance, modeling and best practices. The State should create standards by which to quantify GHG emissions, model land use impacts on GHG emissions, and chart progress in GHG reduction.</li> <li>• Support a strong role for the State in using its infrastructure funding to incentivize GHG-efficient development and discourage development that is not GHG-efficient.</li> <li>• Explore the Indirect Source Rule, the treatment of CEQA with regards to GHG emissions, and two important policies proven to change individual driver behavior: Pay As You Drive Insurance and Congestion Pricing.</li> <li>• We ask that the following issues be addressed in upcoming planning documents, including the CARB scoping plan: <ul style="list-style-type: none"> <li>○ Specificity and definitiveness are vital. ClimatePlan asks CARB to give very clear, definitive direction with respect to land use and California’s AB32 goals in the Scoping Plan.</li> <li>○ The framework needs measurable benchmarks and goals and consequences for not achieving those benchmarks. Clearly identify mechanisms for ensuring that local governments do their share. Local governments should have both incentives to meet the regional targets, and consequences for failing to act.</li> <li>○ Major changes to land use planning and infrastructure investment will require significant sources of new funds. We support the Haagen-Smit Declaration’s priority on securing “new and continuous funding,” and encourage LUSCAT to revisit, or offer more detail, on its Strategy Costs and Costs Savings section.</li> <li>○ If regional planning is to work effectively, agencies such as COGs, MPOs, RTPAs and AQMDs will need not only to work collaboratively like never before but also have clear and distinct responsibilities and authority for planning, implementation and, if need be, enforcement of new GHG reduction requirements.</li> <li>○ The framework should specifically integrate incentives for land conservation and disincentives for sprawl.</li> <li>○ ClimatePlan strongly believes that a more complete treatment of public transportation is warranted, as is a full set of recommendations on improving performance and expanding service. We would specifically ask for attention to finding a sustainable source of funding for public transportation operations, not simply capital investment.</li> </ul> </li> </ul>
Climate Protection Campaign	Provided the August 2007 report, Greenhouse Gas Emission Measurement in the Transportation Sector: Status, Problems and Possible Solutions
Community Alliance of Family Farmers	<p><b>Land use practices for agricultural production and food transportation</b> play a key part in California’s climate impact. Provides following suggestions (similar to CA Food and Justice Coalition):</p> <ul style="list-style-type: none"> <li>• Reduce food miles by tracking and localizing food distribution; CARB should require food distributors and retailers to track and label all items bought within a day’s drive as local; once implemented, CARB should require large supermarkets, food retailers and government procurement programs to carry a minimum number of local product lines and provide carbon credits to the distributors and retailers that demonstrate above-average commitment to local sourcing</li> <li>• Monitor, preserve and expand land use for food production, and create disincentives for the conversion of agricultural land to low-density housing; monitor the carbon impact from the transition of agricultural land to low-density housing, to ensure that future policy is scientifically informed by the impact of farmland conversion</li> <li>• Encourage sustainable farming that reduces fertilizer intensity; ARB should direct DOC to develop metrics to monitor real, verifiable and non-additional emission reduction standards for sustainable farming practices</li> <li>• Develop metrics for local governments to build low-carbon and healthy food programs; Integrate food system planning into local general plans, regional blue prints and similar regional land use, climate change response and planning tools. Direct the DOC to develop a protocol for measuring ‘food miles’ that cities can use to track impacts from municipal food policies</li> <li>• Research solar and wind farming opportunities; ARB can direct the PUC to work closely with other agencies to identify policy opportunities for expanding solar and wind generation on farmland.</li> </ul>

<p>Fehr &amp; Peers (U.C. Davis)</p>	<p>Lauren Hilliard working on research project examining role of local and regional governments in AB32 implementation. Some thoughts, recommendations are:</p> <ul style="list-style-type: none"> <li>• Provide <b>clear guidance</b> to developers and jurisdictions to help them avoid lawsuits. <i>Voluntary</i> GHG strategies for a State mandate to reduce GHG emissions is inconsistent as it opens door for entities (including AG) to sue localities</li> <li>• <b>Regional targets</b> may not promote local flexibility; suggests “ARB will oversee a Local Carbon Budget program where Metropolitan Planning Organizations/ Regional Transportation Planning Agencies and Air District are to be the point of regulation; further, in recognizing the importance of local land-use planning and the need for local-level flexibility to achieve a greenhouse gas per capita budget, the emission reduction responsibility will be placed on cities and counties”: a market-based policy approach allowing inter-jurisdictional trading, would increase flexibility; consider EJ and affordable housing</li> <li>• There are too many existing <b>barriers and disincentives</b> for creating the sustainable developments outlined in Blueprint plans.</li> <li>• Level of Service (<b>LOS</b>) <b>Policy</b> in General Plans determine kind of roadways connecting sustainable developments; maintaining a higher LOS may be an inefficient use of public funds; LOS disincents builders in urban areas, since roads are already congested; higher LOS thresholds negatively impact pedestrians and bicyclists (roads get widened); higher LOS Policy = more VMT; Fehr &amp; Peers is currently conducting research with Cal Poly, SLO focusing on the relationship between speed, LOS, VMT, and criteria/GHG emissions</li> <li>• <b>CEQA</b> standards/thresholds of significance favor auto-based standards and not multi-modal (e.g., peds, bicyclists, transit)</li> <li>• LUSCAT report does not discuss additional forces acting against higher density development: NIMBY, and market-tendency for sprawl building based on cheaper land/lower mitigation fees</li> <li>• Need to coordinate language in legislative bills dealing with LUSCAT-related issues; SB 375 should be a LUSCAT priority recommendation</li> <li>• Report should highlight need for “sustainable corridors” that consider the environmental, economic, and social implications of policies/plans/funding that go into their creation.</li> <li>• Text suggestions include: <ul style="list-style-type: none"> <li>○ <b>LOS Policy.</b> While mandating a specific LOS Policy or methodology may not be in line with the State’s objective of having local flexibility, the State will mandate a methodology in which communities must examine how their current of proposed LOS Policy has tradeoffs with the following: costs, air quality, physical space, sustainable transportation modes and greenhouse gasses.</li> <li>○ <b>Education to public, agency staff, local elected officials, and advocacy groups.</b> The State will fund outreach efforts to educate stakeholders of the tradeoffs involved with new LOS Policies that allow for more vehicle congestion, but more sustainable communities</li> <li>○ <b>Sustainable Transportation Divisions.</b> The State will fund new positions within “Sustainable Transportation Divisions” in all layers of government to assist in the implementation of Climate Action Plans or new policies generated to create sustainable corridors</li> <li>○ <b>Implement Local Carbon Budgets.</b> ARB will oversee a Local Carbon Budget program where Metropolitan Planning Organizations/ Regional Transportation Planning Agencies and Air District are to be the point of regulation; further, in recognizing the importance of local land-use planning and the need for local-level flexibility to achieve a greenhouse gas per capita budget, the emission reduction responsibility will be placed on cities and counties.</li> <li>○ <b>General Plans.</b> Aligning the land use and transportation plan for a region is a must if AB 32 goals are to be met. One way to do this might be: <ul style="list-style-type: none"> <li>▪ Caltrans withholds transportation funding for regions without Blueprints (and ARB provides funding for Blueprints and other sustainable development projects)</li> <li>▪ Metropolitan Planning Organizations withhold transportation funding for jurisdictions who do not align their land use/transport plans with the Regional Blueprint and Regional Transportation Plan; they would also distribute funding for sustainable land use and transportation planning and require that those funds be used for additional good planning efforts</li> </ul> </li> <li>○ <b>Regional Transportation Impact Analysis (TIA)</b> – Doing TIAs at a regional level gives developers incentive to build urban infill because models will show a reduction in regional VMT and not focus just on the increase of vehicles to the roadway system adjacent to the project. While existing models are</li> </ul> </li> </ul>
--	---

	<p>not perfect, there are many efforts underway to better quantify regional VMT reduction from compact development. There is a problem with this though, and that is in order to accurately assess regional VMT reduction from a project, you have to know that the land use from the model is true – unfortunately, unless the land use/transportation patterns in General Plans can get matched with regional plans/models then the results could be false (again, land use projects are local decision). This would have to be paired with an aggressive plan to get General Plans aligned with Regional Plans through strong incentives and disincentives.</p> <ul style="list-style-type: none"> <li>○ Coordinate Legislative Bill Language. Ensure that the efforts from LUSCAT are communicated during the drafting of bill language, so that barriers to implementation of greenhouse gas reduction strategies are reduced</li> </ul>
LAUSD	<ul style="list-style-type: none"> <li>● Los Angeles Unified School District agrees with the Long Term Land Use Vision Principle #4.</li> <li>● Impending state budget cuts to education funding will reduce or eliminate many districts' ability to finance GHG reduction efforts. Districts require financial incentives in addition to Prop 98 funding.</li> <li>● Supports increased collaboration across all levels of government.</li> <li>● Supports siting schools in locations that are centrally located, but urban school districts like LAUSD have limited choices. Make siting criteria voluntary.</li> <li>● Increase funding for High Performance Incentive Grant Program.</li> <li>● Supports the review of schools funding mechanisms to encourage the rebuilding and revitalization of schools in existing urban areas.</li> </ul>
League of California Cities	<ul style="list-style-type: none"> <li>● Any process developed by the state in terms of addressing land use strategies should place local governments on an equal footing with the LUSCAT state agencies</li> <li>● League supports <b>regional "goals"</b> (vs. targets), the calculation of which should first take into account reduction in GHGs that will be gained from a more fuel efficient fleet and using lower carbon fuels.</li> <li>● The state should provide resources to <b>develop models and flexible methodologies</b> as well as encourage best practices</li> <li>● Build on regional <b>Blueprints</b>; notes that the most successful ones have been bottom-up driven</li> <li>● Blueprints, RTP, and RHNA should be integrated into one planning process, which would reduce confusion and produce more focused plans</li> <li>● Revolving <b>fund</b> for planning (Section 6.5) is a good idea</li> <li>● VMT not the only performance indicator; also include number of units per land developed for residential purposes and percentage of units zoned in housing inventory over total assigned housing need</li> <li>● Goals need to more explicitly recognize (and commit funding to) that different infrastructure needs (e.g., firefighting in multi-story housing, code enforcement officers educated about mixed use buildings etc) will result from the growth envisioned by the draft document.</li> <li>● More Specificity in Transportation <b>Funding</b> Needed.</li> <li>● Page 61 recommends streamlining permit processes for reducing discretionary approvals for multifamily, infill, and affordable housing developments. Taken on its face, this statement suggests that existing provisions of various laws are not sufficient but no analysis or justification is provided. If this pertains to CEQA, the report should so stipulate.</li> <li>● Disagrees with need to increase <b>enforcement of the housing element</b> since 80 percent of the local agencies in the state had an approved housing element</li> <li>● Disagrees with the Land Use Legislative Needs Section 6.2 request for legislation that would require <b>LAFCOs</b> to consider infill capacity and GHG emissions prior to granting approvals in extensions of spheres of influence. It would serve as a one-size-fits all rather than a flexible approach.</li> <li>● Supports an increase in funding for the preservation of the <b>existing transportation system</b>, especially local streets and roads; future funding options (congestion pricing, gas taxes, mitigation fees, etc.) must consider the current systems that are severely under-funded and dependent upon some of these revenue streams for critical preservation and safety needs.</li> <li>● Disagrees that higher <b>Waste Diversion Goals</b> are needed. Rather, eliminate some of the Act's existing restrictions on what counts towards diversion; providing for "real" consumer and manufacturer responsibility; placing more emphasis on program implementation and less so on numeric compliance.</li> </ul>

<p>Muriel Strand</p>	<p>Measures in current report are not specific enough, are “Phase I” actions and do not provide meaningful guidance to local jurisdictions. More radical “Phase II” strategies are needed to achieve a sustainable future.</p> <p>Phase 1 Sustainable Actions (Including but not limited to:)</p> <ul style="list-style-type: none"> <li>● Recalibrate city/county utility billing to effectively reward and motivate more conservation &amp; waste reduction, by charging strictly on a volume basis.</li> <li>● Delete oil subsidies</li> <li>● Reduce the workweek to 32 then 24 hours. The same amount of work will then create more jobs.</li> <li>● Ban nonrecyclable plastic take-out food containers</li> <li>● Tax parking spaces, lawns &amp; plastic bags</li> <li>● Require traffic calming devices to be bicycle-friendly too</li> <li>● Revise the vehicle code to give first priority to bicycles, and second to transit.</li> <li>● Require pedestrian walkways to be adjacent to buildings (or residential gardens) rather than adjacent to parking or streets.</li> <li>● Require truly visible street addresses to reduce confusion &amp; excess driving</li> <li>● Ban nonrecyclable plastic take-out food containers; also leafblowers &amp; loud motorcycles</li> <li>● Protect clotheslines, natural landscapes, and affordable housing from the “blight” label</li> <li>● No airport investments because flying uses too much fuel</li> <li>● Match people wishing to trade houses and reduce their commutes</li> <li>● Require LEED certification in the city to exclude irrigation (except for food plants), fossil-fuel landscape maintenance equipment, and fossil-fuel fertilizers &amp; pesticides.</li> </ul> <p>Phase 2 Sustainable Actions (Including but not limited to:)</p> <ul style="list-style-type: none"> <li>● Develop and support (more) classes in traditional crafts &amp; skills, such as spinning, weaving, sewing, smithing, woodworking, etc.</li> <li>● Provide information on courses and workshops for learning sustainable skills</li> <li>● Redesign water treatment processes to compete with bottled water</li> <li>● Develop a low-cost community garden design option</li> <li>● Actively support planting &amp; use of tree crops such as pecans</li> <li>● Develop a permitting process for composting toilets</li> <li>● Develop standard designs &amp; a streamlined permitting process for passive solar construction &amp; renovation</li> <li>● Convert parking lots and suburban streets to urban farms</li> <li>● Revise zoning codes to include inoffensive ways to keep chickens, rabbits &amp; goats in residential yards</li> <li>● Loans for graywater systems in residential &amp; commercial buildings</li> <li>● Convert parking pavement to water-permeable surfaces</li> <li>● Get Cal-PERS to invest in children—nursing, nutrition, skills, education—for elders’ pensions</li> <li>● Design &amp; build a prototype manually-operated clothes washer</li> <li>● Recognize that mothers are working when they are raising our children</li> </ul>
<p>Orange County Transportation Authority</p>	<p>Suggestions in the following areas:</p> <p><b>GHG reduction targets:</b></p> <ul style="list-style-type: none"> <li>● Any 2020 targets should be based on time projections needed to implement the land use and transportation policies and actions that jurisdictions will rely on;</li> <li>● Targets should be created only after all measures implementing AB 32 are adopted and only after a broad, inclusive stakeholder process;</li> <li>● Targets should be advisory, with flexibility granted to local agencies to achieve such goals;</li> <li>● Avoid language that would directly tie project funding or create liability for local agencies if targets are not achieved;</li> <li>● Use incentive-based compliance measures rather than punitive policies;</li> <li>● To allow for regional/local alignment, both RTP and local general plans should be subject to similar requirements to ensure adopted policies can be implemented</li> </ul> <p><b>Blueprint Planning:</b></p> <ul style="list-style-type: none"> <li>● Targets should not be tied to any specific transportation planning document, since would create liabilities</li> <li>● Regional differences in how Blueprints operate must be acknowledged</li> <li>● Avoid one-size fits all and consider the established role of county transportation commissions</li> <li>● CTC guidelines were recently for addressing GHG emissions within the RTP; emission reductions from implementing these guidelines should be reflected in future LUSCAT/CARB documents</li> </ul>

	<p><b>Transportation funding:</b></p> <ul style="list-style-type: none"> <li>• LUSCAT/CARB should ensure that county sales tax measures (e.g., OC's M2) are protected; State transportation funding should allow for implementation of currently programmed projects</li> </ul> <p><b>CEQA Guidelines:</b></p> <ul style="list-style-type: none"> <li>• Agencies need a uniform methodology to perform GHG analyses under CEQA; many entities (e.g., CAPCOA) have offered suggestions but report should be clear that the guidelines released by OPR will be the definitive method of analyzing GHG emissions in environmental analysis documents</li> </ul> <p><b>Congestion pricing:</b></p> <ul style="list-style-type: none"> <li>• 91 Express Lane is good example of congestion pricing policy; rates vary depending on number of vehicles per hour; 3+ carpools can use toll road free at most times</li> </ul> <p><b>Costs of Implementation:</b></p> <ul style="list-style-type: none"> <li>• LUSCAT report assumes that costs of implementing sector strategies would have a net zero cost through 2020 and that existing funding for land-use/transportation activities could be shifted to meet state's GHG goals. This is conjecture and inconsistent with statements (e.g., Principle 10) that state that new funding mechanisms are needed given current lack of funding</li> <li>• There will be costs of implementing LUSCAT strategies; new, innovative forms of funding are needed (e.g., Cap and Trade, public-private partnerships)</li> <li>• Need stable state transportation funding</li> </ul>
The Pacific Forest Trust	<ul style="list-style-type: none"> <li>• Emphasize the significant <b>impacts of land conversion</b>; natural and working landscapes absorb and store CO<sub>2</sub> from the atmosphere and act as "carbon reserves," as well as provide critical ecosystem services such as water quality, wildlife habitat, recreation and local products</li> <li>• In addition to incentives, include <b>disincentives for GHG-intensive sprawl</b> and development that involves the conversion of prime forest and agricultural land.</li> <li>• Adopt a statewide mitigation program and policy of "<b>no net loss</b>" requiring mitigation for net current emissions from development, as well as future and cumulative impacts of land conversion.</li> <li>• Integrate <b>conservation</b> into regional and local models, plans and GHG targets</li> </ul>
Pacific Gas and Electric	<ul style="list-style-type: none"> <li>• Encourage local jurisdictions to consider access (e.g., height, setbacks from the property line, exterior aesthetic design restrictions, yard projections, lot orientation, and lot coverage requirements) to renewable energy such as solar energy, daylight, and wind as they restructure their <b>zoning and building code laws</b> to address climate change.</li> <li>• Local governments should consider the impact of the amount of paving, street paving materials, and vegetation planning to specifically reduce the impact of <b>heat islands</b> due to public works projects.</li> <li>• The <b>LEEDND</b> standards listed on page 62 of the LUSCAT report may not be in effect at the end 2008; consider writing in the "LEED Rating System" as a generic substitute for LEEDND until the final direction of the LEED program is determined.</li> </ul>
Planning and Conservation League	<ul style="list-style-type: none"> <li>• The draft report fails to <b>provide clear recommendations</b> on the policy mechanisms necessary to ensure that significant quantifiable emission reductions occur through better land use and transportation activities in California; revise report to <b>characterize enforcement as its core strategy</b> and outline specific measures that CARB should adopt to ensure success</li> <li>• Rather than focusing on CEQA "thresholds", the report should recommend that CARB and other agencies fulfill their legal mandate under <b>CEQA</b> as Lead and Responsible Agencies to ensure that greenhouse gas emissions are analyzed and avoided or mitigated where feasible</li> <li>• Report should propose specific methods to avoid disproportionately impacting <b>low-income communities</b> in the implementation of its proposed land use and transportation policy reforms</li> </ul>
Regional Council of Rural Counties	<p>Supportive of report, including policies:</p> <ul style="list-style-type: none"> <li>• To identify <b>financial disincentives</b> to GHG related local and regional planning and alternatively recommend incentives, including consideration of tax reform efforts.</li> <li>• Recognition that local government will need <b>financial and regulatory assistance</b> and implementation flexibility.</li> <li>• To develop <b>clear guidance and expectations</b> for regional and local government in the form of guidelines, information, methodologies and technical resources, and consider developing a package of programs and resources targeted at rural community assistance.</li> <li>• Require policies to <b>remove barriers</b> to, and allows development in appropriate infill locations. The report</li> </ul>

	<p>acknowledges that CEQA challenges are a major impediment to approving the infill housing in many communities and regions that would help to address GHG emissions.</p> <ul style="list-style-type: none"> <li>• That the LUSCAT <b>does not support mandatory local climate action plans</b>, but recommends that ARB should develop a Climate Action Plan Template to assist local government and small businesses.</li> <li>• That the ARB should base its <b>targets</b> and recommendations on where the greatest reductions can be achieved for the lowest cost.</li> </ul>
<p>Sacramento Area Council of Governments</p>	<p>SACOG supports <b>regional targets</b> in the transportation sector that are supported by technical and financial assistance to help the regions succeed.</p> <ul style="list-style-type: none"> <li>• Provides well-documented examples of why <b>GHG reduction targets</b> should be set at regional level (by regional transportation agencies) and not local level (paper by Dan Sperling accompanying Haagen-Smit action document proposes local targets). Setting GHG per household reduction targets would work against the success of Blueprint plans. Blueprint processes are in place; creating a new, parallel system for VMT would, at best, be cumbersome and confusing.</li> <li>• <b>Accountability measures</b> and incentives are needed to ensure regional plans are effectively implemented at the local level. Suggested metrics include: <ul style="list-style-type: none"> <li>• After an RTP is adopted that meets its GHG reduction target, the MPO can calculate and allocate carbon emissions/household to be attained by 2020 (2050) for every jurisdiction in the region</li> <li>• As city/counties make land use decisions, the relationship of those actions can be compared to the likely land use development for that local government in the adopted RTP. Modeling can determine whether the local action increases or decreases carbon emissions/household compared to the RTP</li> </ul> </li> <li>• Relatively small number (4) regional agencies represent the large majority of the state's population – much more workable than state-created targets for several hundred local governments in the state</li> <li>• Suggested <b>co-benefits</b> to other sectors: <ul style="list-style-type: none"> <li>○ Higher percentage of attached housing, which reduces heating and cooling energy per square foot, compared to detached housing</li> <li>○ Smaller yards and less water demand, saving treatment and pumping energy</li> <li>○ Shorter infrastructure runs, saving pumping energy for water/sewer, and uses less embedded energy for roads and pipes</li> <li>○ Preserves grazing, farm and forest land with carbon sequestration benefits</li> <li>○ Mixed-use, higher density developments flatten peak demand, allowing energy to be served more efficiently and making renewable more cost-effective</li> </ul> </li> <li>• The state should be clear about whether regional targets for transportation and land use address these co-benefits in the calculations or not (GHG reduction estimates?)</li> </ul>
<p>SANDAG</p>	<ul style="list-style-type: none"> <li>• Ensure that land use strategies related to <b>building codes and standards</b> are adequately addressed and promoted. Acknowledge the close relationship between building- and transportation-related land use impacts (including measures in water and energy reports; concerned that the role of local governments in regulating building code-related land use could be falling through the cracks of the state climate change planning process.</li> <li>• Report should address <b>Transportation Demand Management (TDM) strategies</b> such as ridesharing and telecommuting; Transportation modeling is mistakenly described as TDM on page 32Pg. 11, 'Promote State Leadership', include facilities that are exempted from local land use regulation by the State, such as public school facilities</li> <li>• Pg. 12 and 71, define net zero cost and provide rationale and research for statement "it is assumed that state, regional, and local agency partners will be able to redistribute and leverage existing <b>funding</b>..."</li> <li>• State that GHG emissions from state facilities will be subtracted out of any regional <b>targets</b>.</li> <li>• Page 19 in section on land use planning, discuss the land use regulatory process (including <b>zoning</b>, regulatory permits, subdivision regulations, building permits, etc.)</li> <li>• Pg. 29, change "Rural Transportation Planning Area (RTPAs)" to "Regional Transportation Planning Agencies."</li> <li>• Pg. 39 and 40, "Natural Resources Protection and Agricultural Land" section should discuss land use planning and regulatory activities required or allowed under State and/or Federal law: <ul style="list-style-type: none"> <li>○ State law pertaining to local general plans calls for elements addressing open space, conservation, safety and seismic safety, which can include land use-related policies related to natural resource protection and agricultural land.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>○ The California Coastal Act contains policies related to natural resource protection and agricultural land for areas located in the Coastal Zone.</li> <li>○ State and Federal laws pertaining to endangered species protection, as well as the State Natural Communities Conservation Program, (all administered by State DF&amp;G) set forth requirements and policies related to natural resource protection.</li> <li>● Pg. 41, "Water Planning, Distribution, and Quality" should include State law requirements re. evaluation of water supply in local general plans, evaluation of water supply availability during the review of major development projects.</li> <li>● Pg. 52, "<b>School Siting</b> Guidelines", discuss possibility of requiring proposed school sites to be subject to local government review in relation to land use-related impacts and mitigation measures related to GHG emissions</li> <li>● Pg. 53, first sentence: "providing <b>GHG reduction targets</b> for the transportation and land use sector" is not clear; would these targets pertain only to emissions from autos and light trucks, or would they also pertain to other emissions that may be affected by land use policies, such as energy and water?; If setting regional GHG emission targets, consider setting targets that include all sectors that are affected by land use (water and energy)</li> <li>● Pg. 55, California regional <b>blueprint plans</b> do not include "land use designations," but rather include land-use policy recommendations that are recommendations to local governments/other land use regulatory authorities.</li> <li>● Pg. 57, the discussion does not make a clear distinction between the items listed in Section 4.2 and those listed in Section 4.3.</li> <li>● Pg. 60, if State requires regional blueprint plans to include specific content pertaining to climate change policies and strategies, there should be <b>funding</b> provided to meet these requirements.</li> <li>● Pg. 79 and 80, it is not clear how each of the performance indicators listed here pertains directly to reduction of greenhouse gas emissions, or how this information would be used.</li> <li>● Pg. 60, <b>OPR/CEQA</b> discussion should include: specific thresholds (defined by State) for projects that would not have to evaluate impacts to climate change (due to project type, size and/or location). Small projects consistent with land use plans should not have to evaluate impacts to climate change; The State should provide methodologies for determining GHG emissions from projects to establish evaluation consistency throughout the state; Guidance should be provided in CEQA for alternative mitigation strategies that encourage contributions to transit instead of road widening and auto-oriented mitigation measures.</li> <li>● <b>Regional Blueprints</b> (vs. Regional Transportation Plans) are the most suitable planning tool for developing regional climate change policy</li> <li>● Local governments need to update their <b>general plans</b> so that they look beyond 2020 and are consistent with the timeline of regional blueprints and RTPs.</li> <li>● Citations should be provided for: <ul style="list-style-type: none"> <li>○ The correlation between VMT and GHG</li> <li>○ Methodology for determining that the selected mitigation strategies are "those that could significantly reduce emissions." (Pages 58, 63)</li> <li>○ Conclusion that congestion pricing will reduce VMT and GHG emissions. (Pages 68-69)</li> <li>○ Statement that "large-scale public education programs in California have been very successful at reducing energy use and waste." (Page 70)</li> </ul> </li> </ul>
Southern California Association of Governments	<ul style="list-style-type: none"> <li>● Supports MPOs as play major role in AB 32 implementation. Recommends that regional differences be considered when developing statewide programs such as funding sources, size and implementation authority. SCAG's federal funding restricts allowable work to transportation planning – this would constrain its ability to take on regional role envisioned by LUSCAT report. Agrees with report's assertion that "the state should work with regional and local government to develop consistent funding mechanisms to support planning activities and plan implementation that are not solely dependent on sales tax revenues, new development or transportation funds."</li> <li>● Supports LUSCAT's recommendation for expanding role of <b>Regional Blueprint Planning</b>. Agrees that funding, guidance and training (guidelines, modeling tools) are needed.</li> <li>● Recommends holding multiple workshops throughout So. Cal. Once draft Scoping Plan is released</li> </ul>

<p>South Bay Cities Council of Governments</p>	<p>SBCCOG has a vision that differs substantially from the <i>smart growth</i> (density and transit) strategy upon which the LUSCAT submission to the ARB is based. This sub-region of Los Angeles County is a fully developed suburban area. Transit service is poor and most trips are taken by automobile resulting in many intersections with Level of Service E and F. There is little vacant land, so most new construction will take the form of redevelopment of existing buildings.</p> <ul style="list-style-type: none"> <li>• We believe that the most direct and quickest route to making trips shorter is not only by looking at other modes such as transit and biking but also by introducing a system of neighborhood transportation which should then stimulate, along with other policies, the development of neighborhood economies. Density, if it is needed, would then fit into that evolving framework of neighborhood functionality and neighborhood transportation. This strategy is supported by our research into the transportation performance of eight South Bay neighborhoods conducted between 2004 and 2008. A strategy different from smart growth is necessary because, based on our research, there is no reason to believe that more density would produce anything but more congestion.</li> <li>• The State of California could support the efforts of the Medium Speed Electric Vehicle Alliance in their petition to the National Transportation Safety Administration (NTSA) to allow NEVs to travel at 35MPH in 35MPH zones (NEVs are currently prohibited by the NTSA from traveling at a speed greater than 25MPH significantly handicapping their effectiveness in replacing gasoline fueled vehicles as a second or third car in many households).</li> <li>• The smart growth strategy is not ready to become state-wide policy because it lacks necessary implementation details. The lack of clear definition opens the door to potential development abuses. Because smart growth parameters are not well defined, it becomes difficult for practitioners to separate not-so-smart dense infill projects from those that can lead to VMT reductions.</li> <li>• Doubts that public transit can scale-up to effectively serve the current population size and extent. In 1920 when the Pacific Electric system provided excellent transit service there were 800,000 people in LA County and the primary destination was the downtown central business district. Today there are over 10 million people traveling to tens of thousands of destinations. The situation may be too complex for any system of public transit to effectively cover without other complimentary modes such as the use of NEVs.</li> <li>• Before LUSCAT adopts the smart growth strategy, it should work with regional transit agencies to identify the mode share required of public transit in 2010, 2015 and 2020 along with the plan and the costs for achieving it in each region in the state.</li> <li>• The way in which the built environment is <i>used</i> causes travel demand, not the built environment itself. Changes in institutional policies will likely be less expensive and faster to deploy than re-constructing the built environment. The draft Scoping Plan recognized this fact by including a telecommuting recommendation but it does not go far enough. The idea is to encourage <i>distributed organizations</i> that rely on broadband networks to comprehensively move the work to the worker and services to the consumer.</li> </ul>
<p>The Climate Group</p>	<ul style="list-style-type: none"> <li>• The report should include specific recommendations on ways to <b>measure actual Vehicle Miles Traveled</b> (VMT) instead of modeling of VMT. Since you “can’t reduce or manage what you can’t or don’t measure” it is important to include these recommendations in the report.</li> <li>• One of the recommendations of ways to measure actual VMT could be through automobile odometer readings. Currently in California, cars older than six years old are required to receive a smog check every two years, which includes the recording of odometer readings. This information should be included in public records and odometer readings should be required for the “gap” years, those cars six years old or newer. This information will also help in instituting one of the other recommended programs such as “pay as you drive” insurance or regional VMT charges. The State could also require annual odometer readings and use the existing test-only smog stations to do so.</li> <li>• Another way to measure actual VMT is a certification, subject to period audit, on the annual vehicle registration renewal form. Documentation, such as the odometer reading from a third party e.g. oil changes, tune ups etc. could be part of an audit. This data should also be kept in the public record.</li> <li>• A high tech solution would be a GPS-type system installed on cars</li> </ul>
<p>Transportation Solutions Defense and Education Fund</p>	<p>TRANSDEF believes that the following elements of the report are essential to bring about the level of change needed to achieve AB32 VMT goals:</p> <ul style="list-style-type: none"> <li>• <b>Regional targets for GHG emissions</b> reduction from the land use sector; mandatory for each region; per capita reduction target for existing residents, and a separate one (lower given LUSCAT future strategies) for future residents</li> </ul>

<p>(original comments plus follow-up email)</p>	<ul style="list-style-type: none"> <li>● <b>CEQA Guidelines</b>; additional GHGs should be considered a significant impact. Add the following to the Air Quality section of the Checklist: "Result in greenhouse gas emissions that delay the attainment of AB 32 targets?"</li> <li>● <b>High-Speed Rail</b>; need to impose minimum density zoning guidelines as the requirement for station siting, to catalyze a densification of future growth around station areas, and a development focus on urban cores.</li> <li>● <b>Indirect Source Mitigation Fees</b>; need to be high enough to channel growth into walkable higher density communities</li> <li>● <b>Congestion Pricing</b>; start pricing highways to provide appropriate economic incentives to discourage single-occupant driving, and to encourage carpooling, walking, biking and using transit</li> <li>● <b>Pay as You Drive Insurance Premiums</b></li> <li>● Strategies to reduce employee commute trips; revisit Legislature's rescission (SB 437) of authority of APCDs to impose Employee Trip Reduction Ordinances.</li> <li>● Include following strategies for further consideration <ul style="list-style-type: none"> <li>○ Funding for urban and infill schools</li> <li>○ Market-priced parking</li> <li>○ LAFCOs need to restrict annex of vacant lands, thus pushing infill</li> </ul> </li> <li>● Consider innovation <b>TCM measures</b> such as adoption of mitigations for increases in trip generation and GHG emissions as part of the conditions of local project approval. These should include best management practices in parking, including parking pricing, parking cash-out, ecopasses, car sharing, unbundling of parking from leases and real estate purchases, and shuttles. Changing status quo will be VERY difficult;</li> <li>● Include a section providing strategies for <b>educating the public</b> on why the LUSCAT program is needed, what the world according to LUSCAT will look like, and how it will function. Color drawings pulled from various guides for fighting sprawl would be helpful in providing a visual sense of what is intended.</li> <li>● ARB will need to create an extensive <b>CEQA Mitigation Bank</b>, which will enable small projects to pay a mitigation fee to be able to receive a Mitigated Negative Declaration.</li> <li>● Offered to provide editing. Report structure tends to give everything in it equal priority. But some things stand out head and shoulders above the rest of the text in their significance. One of these is Principle #3 of 1.1.2 on pg. 8. This may be the first time this thought has been expressed in a State document. It should be given prominence, as it is the very heart of LUSCAT.</li> <li>● Define "LDV" in the chart on pg. 15. Put footnote 3 on that page. Where are footnotes 1 &amp; 2 on pg. 14?</li> <li>● We suggest a restructuring of Section 4.0, so that 4.1, 4.2, and 4.4 instead become 4.0.1, 4.0.2, and 4.0.3. We think this is important to bring the significance level of those sections down a notch, as they are only introductions. We suggest 4.3 be deleted, with 4.4.6 that it refers to being moved to be part of Transportation, as all the strategies mentioned belong there. We suggest 4.0 and 4.4 (now 4.03) should not be used as tables of contents. That is too confusing, when the referred-to text is just a page or so away. 4.0.3 could instead just discuss the three groupings for each sector strategy following. We then suggest renumbering 4.4.1 as 4.1, 4.4.2 as 4.2, 4.4.3 as 4.3 (including 4.4.6 as its subsection 4.3.1), 4.4.4 as 4.4, and 4.4.5 as 4.5.</li> </ul>
<p>Western Riverside Council of Governments</p>	<p>Provided specific comments for the following LUSCAT sections:</p> <ul style="list-style-type: none"> <li>● Section 1.1.2 (<b>Principles</b>), "2. Going forward the State will adopt policies to address land use decisions directed at reducing GHG emissions in a collaborative effort with local and regional governments." Provide clarification to term "collaborative effort."</li> <li>● Section 2.2.1 (<b>CEQA</b>), clarify what LUSCAT has in mind for CEQA. Suggests one way to increase efficient of CEQA process would be to educate judicial system on local governments land use decisions and practices</li> <li>● Section 2.3.3 (<b>Transportation/Blueprint Planning</b>) <ul style="list-style-type: none"> <li>○ Change Blueprint process by hiring local consultants who understand the local government's issues and conduct more frequent meetings to ensure all local needs are met</li> <li>○ "Any additional Blueprint funding resources should be tied to demonstration of progress in implementation across all blueprint goals, including housing, transportation, and resource protection." WRCOG: State needs to shepherd this process from Blueprint process concept to implementation stages if State wants to connect funding resources to the process</li> </ul> </li> <li>● Section 2.4.3 (<b>Housing</b>),</li> </ul>

	<ul style="list-style-type: none"> <li>○ "State agencies with housing funding programs should examine their criteria and, when appropriate and within their statutory authority, incorporate climate change consideration." WRCOG: If State wants local governments to include this in their housing programs, then State should provide <b>assistance</b> (e.g., through template documents)</li> <li>○ "Existing infill exemption provisions for infill do not work." WRCOG: clarify data behind this statement. Document has statements throughout that do not have supporting <b>documentation</b>. Will an appendix provide this info?</li> <li>● Section 2.5.3 (Natural Resources/Ag) <ul style="list-style-type: none"> <li>○ Clarify what is meant by "terrestrial sequestration." Additional background info would be helpful</li> <li>○ Clarify what is meant by "sequestration potential"</li> </ul> </li> <li>● Section 2.9.2 (State Capital Outlay) <ul style="list-style-type: none"> <li>○ RE. State building designs, State may want to consider building a LEED basic program.</li> </ul> </li> <li>● Section 2.10 (<b>School Construction</b>). State needs to recognize that local governments have no authority on how a school district sites its schools, and when developing strategies for school siting, the State needs to be very clear and not hold local governments accountable for school activities.</li> <li>● Section 3.1 (<b>Defining Target</b>), "Targets in all sectors should be analyzed for cost per ton of reduction. ARB should based its targets and recommendations on where the greatest reductions can be achieved for the lowest cost." WRCOG: this statement leads reader to believe that the State is only interested in "low hanging fruit." All sectors should be considered equal and not equitable when defining targets to ensure State is going to meet AB32 goal</li> <li>● Section 4.3 (<b>Pay as you Drive</b>), WRCOG: this is a regressive tax on those who may not be able to afford it. Although intent is to mobilize people close to work centers, there are areas of the state where residents can't afford to move closer</li> <li>● Section 4.4.1 (<b>Land Use</b>), <ul style="list-style-type: none"> <li>○ "The Integrated Waste Management Board will develop watershed-friendly sustainable landscape guidelines that reduce GHGs...WRCOG: shouldn't this be DWR's responsibility?"</li> <li>○ "By developing protocols and working lands model that can be adapted to the needs and circumstances of a particular local government, the consequences of GHG emissions and other ecosystem services can be factored into the local land use decision-making process. WRCOG: clarify "ecosystem services", Unclear what State is trying to convey in this statement.</li> <li>○ Identify improvements to <b>CEQA</b> to reduce barriers....for updating the CEQA Guidelines pursuant to AB 97." WRCOG: should be SB 97.</li> <li>○ "Award and manage grants and loans from Prop 84 to support the development of sustainable communities." WRCOG: Provide clarification as to whether this statement would dilute the intent of Prop 84</li> <li>○ Section 6.8 (<b>Waste</b>), "Increase mandatory recycling goals by jurisdictions from 50% to 75% by 2015." WRCOG: some jurisdictions have not met 50% goal for reasons outside the control of local government. Much harder for locals to achieve this goal than for State facilities and schools. Therefore, pursue this strategy at state level and not the local government level</li> </ul> </li> </ul>
--	--