

ClimatePlan

Chair Mary Nichols and Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

December 16th, 2016

Re: 2030 Target Scoping Plan Update, Discussion Draft

Dear Chair Mary Nichols and Members of the Board,

Thank you for the opportunity to comment on the discussion draft for the 2030 Target Scoping Plan. In this letter, we want to note a few things that we support – and hope will be retained in the scoping plan – as well as provide some recommendations to bolster the plan.

But first, we want to applaud the board and staff for their inclusive and thoughtful public participation process. With staff hosting a series of workshops across the state, and the leadership of the Environmental Justice Advisory Council (EJAC), we have seen a robust and targeted effort to ensure a diverse group of stakeholders and community members shape this important plan.

In addition, we appreciate that the discussion draft includes the following commitments and urge the board to keep these in the draft version of the Scoping Plan to help us meet our climate goals:

1. Increasing low carbon mobility choices, including improved access to viable and affordable public transportation, shared mobility, and active transportation options.
2. Quadruple the proportion of trips taken by foot by 2030 (from a baseline of the 2010 - 2012 California Household Travel Survey).
3. Strive for a 9-fold increase in the proportion of trips taken by bicycle by 2030 (from a baseline of the 2010 - 2012 California Household Travel Survey).
4. Stabilize transportation funding so investments are available to develop sustainable and well-maintained transportation networks in California.
5. Support and assist local and regional governments, through grant programs and technical assistance, to develop and implement plans that are consistent with the goals in “Vibrant Communities and Landscapes.”
6. Continue to develop and explore pathways to implement State-level VMT reduction strategies, such as those outlined in the document “Potential State-Level Strategies to Advance Sustainable, Equitable, Communities and Reduce Vehicles Miles Traveled (VMT) -- for Discussion” - through a transparent and inclusive interagency policy development process to evaluate and identify implementation pathways for additional policies to reduce VMT and promote sustainable communities.

As the discussion draft notes, “despite California’s marked progress, greater innovation and effort is needed to avoid the worst consequences of climate change.” With the passage of SB 32 and AB 197, it is clear that we need to do more sooner to ensure we reduce greenhouse gas emissions 40 percent below 1990 levels **without** exacerbating negative impacts to disadvantaged communities.

We recommend the proposed 2030 scoping plan include the following recommendations to ensure that all Californians can live in sustainable, equitable, and healthy communities:

1. Recommend higher SB 375 targets that align with SB 32 and provide direct benefits to disadvantaged communities.
2. Include statewide VMT reduction assumptions in the Scoping Plan that achieve the 2030 GHG reduction target as well as key strategies and milestones to reduce vehicle dependence in all communities, including the following:
 - a. Strong implementation of SB 743 to ensure each region's’ transportation projects reduce vehicle miles traveled (VMT).
 - b. Affordable “transit oriented development” to maximize VMT reductions.
 - c. Significant investment in rural communities’ land use and transportation policies will help us meet our goals.
 - d. Performance targets for transit ridership similar to the performance targets for pedestrian and bicycle trips.
3. Recommend strategies such as binding Climate Action Plans for cities of a certain size to ensure local governments are on track to achieve the 2030 GHG reduction target.
4. Maximize and showcase benefits from the Sustainable Freight goals such as improved air quality and health to those most negatively impacted by freight as well as mitigate environmental and socioeconomic harms.
5. Ensure stronger coordination with key transportation agencies such as California Department of Transportation (Caltrans), California State Transportation Agency (CalSTA), and California Transportation Commission (CTC) to ensure that **all** transportation investments meet our ambitious climate and equity goals.
6. Encourage Strong Public Participation throughout the process.

Below, we provide detailed recommendations to further strengthen the draft 2030 scoping plan:

1. **Recommend higher SB 375 targets that align with SB 32 and provide direct benefits to disadvantaged communities.** While we are supportive of ARB staff’s intent to work with regions to update SB 375 targets, we believe a stronger mandate is necessary to achieve the SB 32 targets. We recommend that the 2030 draft scoping plan clearly states that ARB will promote higher SB 375 targets that align with SB 32 to ensure that we can maximize the VMT reduction benefits of SB 375. Without ARB’s leadership and direction for higher targets, we remain concerned that some regions may attempt to maintain status quo and not seek more ambitious land use and transportation policies that could transform their regions into more walkable, bikeable, transit friendly communities that ultimately reduce greenhouse gas emissions. We also recommend that ARB identify key performance measures for regions that ensure these higher targets provide health,

equity, and conservation benefits. In 2015, the Governor issued a directive that called for Office of Environmental Health Hazard Assessment (OEHHA) to analyze how California's climate policies are impacting communities that face a disproportionate burden of pollution. The report will be released this December; we recommend that once this report is released, ARB staff use this information to ensure that climate policies like SB 375 provide direct benefits and mitigate harms.

2. Include statewide VMT reduction assumptions in the Scoping Plan that achieve the 2030 GHG reduction target as well as key strategies and milestones to reduce vehicle dependence in all communities, including the following:

- a. ***Strong implementation of SB 743 to ensure each region's' transportation projects reduce vehicle miles traveled (VMT).*** We are encouraged by staff's inclusion of SB 743, as we see it as another tool to ensure we meet our ambitious climate goals. We recommend, in addition to the current language that states the Office of Planning and Research (OPR) will replace the level-of-service (LOS) metric to VMT, the draft 2030 scoping plan commit ARB to strong implementation of SB 743, in alignment with other state agencies such as the Office of Planning and Research and Caltrans. Within the technical advisory and guidelines, there is strong guidance (and incentives) for regions to prioritize VMT-reducing transportation projects over traditional highway and road expansion projects. If we are serious about meeting the goals of SB 32, it is important that ARB works with OPR and the regions to ensure that SB 743 is implemented in a way that helps us achieve our climate goals.
- b. ***Affordable "transit oriented development" to maximize VMT reductions.*** As we noted in our previous comment letter in September, there is a growing body of research that clearly shows the benefits of building and preserving affordable homes near transit. Previously we shared: "As noted in the California Housing Partnerships working paper, Building and Preserving Affordable Homes Near Transit: Affordable TOD as a Greenhouse Gas Reduction and Equity Strategy, households with incomes less than \$20,000/year are at least four times more likely to use transit and at least five times less likely to own a car than higher income groups. New or improved transit stations attract higher income residents (with higher car ownership) and, without careful attention to housing affordability, can either render the area unaffordable to lower-income households or displace existing lower income residents. Such impacts significantly reduce the transit ridership and GHG reductions benefits of transit investments. Building and preserving affordable housing, and preventing displacement, near transit stations, can help ensure that lower-income, high-propensity transit riders live near transit." Despite this information, this discussion draft does not include nor address the connection between affordable transit oriented development and reductions in VMT. In addition to the research, given the affordable housing crisis California is currently facing, we recommend the draft 2030 scoping plan include a clear statement and policy strategies that address the need to preserve as well as

build affordable transit oriented development to help us meet our climate and equity goals.

- c. ***Significant investment in rural communities' land use and transportation policies will help us meet our goals.*** Again, in our previous comment letter in September, we noted that the draft 2030 scoping plan could be a catalyst to transform the development patterns of rural California away from sprawl-oriented greenfield development to equitable infill development that reduces VMT. We highlighted the fact that rural communities have the opportunity right now to change their land use patterns and avoid the entrenched challenges that other built-out communities currently face. We outlined how, with significant investment, rural communities and small cities can demonstrate contributions to reduced VMT and GHG emissions, through strategies such as:

- i. Promote location efficient housing which focuses on building affordable housing near amenities or by supporting developments that include services such as health care and child care, along with shared vehicles or vanpools for residents to travel to and from work and school.
- ii. Direct state transportation funds to provide direct benefits for rural communities such as investing in transit infrastructure as well as other basic infrastructure needs such as sidewalks, street lights, drinking water and wastewater to improve transit service, facilitate infill development, and support active transportation in rural areas and small cities.
- iii. Develop a strategy that caters to rural communities, including creating programs and policies that are more responsive to less populated communities with distinct infrastructure and transit needs. The strategy must also increase funding for the development, planning, and expansion of public transit services in rural unincorporated communities and the development of vanpool/vanshare programs in communities with limited transit service to help reduce VMT.
- iv. Strengthen energy programs for disadvantaged communities by developing incentives for landlords to provide energy efficient and weatherization upgrades for low-income, rural communities.

Despite our detailed feedback, these issues are not included in the discussion draft. We recommend for the draft 2030 scoping plan, there is a dedicated section within transportation that outlines the significant opportunities for reduced VMT, and ultimately GHG emissions, from our rural communities with dedicated investment from our state transportation dollars.

- d. ***Performance targets for transit ridership similar to the performance targets for pedestrian and bicycle trips.*** We are very supportive of the quantifiable performance targets for pedestrian and bicycle trips. We believe it is essential to set ambitious targets for our different transportation modes that can be measured to ensure we are on track to meet our climate goals. ClimatePlan's report, "Towards a Sustainable Future, Is Southern California On Track" measures public transit ridership in Southern California and can provide a resource as to how the

state could set a statewide goal to increase public transit ridership. Similar to our pedestrian and bicycle trips, we recommend that the draft 2030 discussion draft include quantifiable performance targets for transit ridership to ensure that our transit agencies and regions work together to boost our public transit and make it accessible and affordable for all.

3. **Recommend strategies such as binding Climate Action Plans for cities of a certain size to ensure local governments are on track to achieve the 2030 GHG reduction target.** For the state to achieve a reduction of 40% below 1990 levels of overall GHG emissions, we need coordinated action at the state, regional, and local level. In its own documents, ARB stated there is a gap in the ability of state-level actions to meet the mandated GHG reduction targets post-2020. With this gap, local land use and transportation decisions, including bicycling / walking / and transit goals as well as any zoning changes, are more important than ever to ensure infill and transit-oriented development occur. These types of developments at the local level will help to close the gap so we can achieve our ambitious climate targets. Additionally, most major cities are already developing binding Climate Action Plans (CAPs) through CEQA mitigation as they update their General Plans. For best results, we recommend the draft 2030 scoping plan recommend strategies such as binding local Climate Action Plans to the 2030 GHG emissions target or policies that increase penalties for polluting industries and facilities.
4. **Maximize and showcase benefits from the Sustainable Freight goals such as improved air quality and health to those most negatively impacted by freight as well as mitigate environmental and socioeconomic harms.** We support the goals outlined for Sustainable Freight. However, this discussion draft does not offer any analysis on how these goals will benefit the vulnerable communities most impacted by our freight system. For the draft 2030 scoping plan, we recommend the inclusion of a detailed analysis that explains how these goals will provide direct and meaningful benefits to those most impacted by our freight system. We also recommend that this section include the necessary mitigations to ensure that we meet our ambitious climate goals and do not exacerbate negative impacts on vulnerable communities.
5. **Ensure stronger coordination with key transportation agencies such as the California Department of Transportation (Caltrans), California State Transportation Agency (CalSTA), and California Transportation Commission (CTC) to ensure all transportation investments achieve our climate and equity goals:** As noted above, we support the policy commitment in the discussion draft to “develop and explore pathways to implement State-level VMT reduction strategies through a transparent and inclusive interagency policy development.” However, some elements of the Legislature's transportation package would direct a majority of the new funding towards road maintenance and capacity projects. With the exception of the Greenhouse Gas Reduction Fund (GGRF) and funding for cleaner trucks and freight equipment, none of new transportation funding provides direct benefits to disadvantaged

communities or is dedicated to transportation projects that will reduce VMT, which are required in order to reach our climate goals. We will need to do **much more** if we want to reduce greenhouse gas emissions 40 percent below 1990 levels by 2030. We need to **align all** of our transportation dollars to prioritize projects that reduce GHG emissions and benefit disadvantaged communities. We recommend that the draft 2030 scoping plan call for stronger coordination with the Legislature, Caltrans, CalSTA, and CTC to ensure all transportation funding proposals align with our climate and equity goals.

6. **Encourage Strong Public Participation throughout the process:** With the release of the draft 2030 scoping plan in January, we hope to see the board, staff, and the EJAC continue in this vein, by providing ample time and resources to ensure that all stakeholders and community members are able to weigh in and ensure this plan achieves our climate goals **and** benefits all communities with improved air and water quality, public health and employment opportunities in the clean energy economy. To ensure effective public participation during stakeholder workshops, we recommend the Air Resource Board partner with local organizations that have strong relationships with community residents. In addition, translation services should be provided and ensure all written materials are translated. The workshops should also include a plan to provide food and childcare to ensure working parents can participate in the process.

In closing, we support the vision of the 2030 scoping plan. We are excited to partner with ARB to ensure that this plan maximizes the strongest policy strategies and commitments to ensure we promote more sustainable, equitable, and healthy communities.

Sincerely,

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