



California Air Resources Board  
1001 I Street  
Sacramento, CA

RE: Air Resources Board SB 375 Roundtable

May 26th, 2017

Dear ARB board members and staff:

Thank you for the opportunity to provide comments to help shape the Air Resources Board's upcoming roundtable on SB 375.

At its passage in 2008, SB 375 was heralded as "the most sweeping revision of land use policy since Governor Reagan signed the California Environmental Quality Act."<sup>1</sup> Now, almost ten years later, we've witnessed how SB 375 has transformed regional planning by increasing public participation, improving social equity outcomes, protecting natural and working lands, and better aligning our decisions around land use and transportation planning to reduce how much we drive.

However, we understand that there is still much more needed in terms of policy changes - and funding - to ensure that SB 375 is successfully implemented. Below, we offer our recommendations to ensure that the roundtable helps chart a path forward that will bolster SB 375's progress and identify how the state can play a stronger role to maximize the benefits of SB 375 and the planning work it has generated, not only in meeting the state's climate goals but in making regions more healthy, equitable, and environmentally sustainable.

Our recommendations for the ARB Roundtable are as follows:

1. The roundtable should be focused on strengthening SB 375 and identifying state-level actions to reduce VMT.
2. The roundtable should include diverse representation.
3. The roundtable should provide ample time to discuss key topics related to SB 375 and reducing VMT.

#### **Detailed Recommendations for the ARB roundtable:**

- I. The roundtable should be focused on strengthening SB 375 and identifying state-level actions to reduce VMT

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<sup>1</sup> BART. 2008. "Governor signs landmark legislation cutting congestion and air pollution, helping BART." <http://m.bart.gov/news/articles/2008/news20081001>

The first goal of the roundtable should be to provide much-needed tools and resources to further strengthen SB 375. ClimatePlan's report, *Leading the Way: Policies and Practices for Sustainable Communities Strategies*<sup>2</sup>, as well as Appendix L: Planning Practice Examples in the 2017 Regional Transportation Plan Guidelines for Metropolitan Planning Organizations<sup>3</sup> outline a number of key strategies that have helped some regions achieve higher greenhouse gas reduction targets, while also maximizing co-benefits around health, social equity, and land conservation. Unfortunately, the majority of regions have not yet implemented these strategies and policies due to a variety of issues. This roundtable should provide a space for MPOs, state agencies, ARB board members, and stakeholders to work together to identify the necessary tools and resources to help all regions implement key strategies and policies to maximize their greenhouse gas reductions as well as co-benefits.

The second goal of this roundtable should be focused on identifying the state-level actions necessary to reduce VMT, as well as which state agencies can implement those actions. In the white paper, *A Framework for Projecting the Potential Statewide Vehicle Miles Traveled (VMT) Reduction from State-Level Strategies in California*<sup>4</sup>, there are a number of state-level VMT strategies necessary to help us achieve our climate goals. With state agencies, MPOs, ARB board members, and stakeholders, the roundtable should identify which strategies California needs to advance, as well as a timeline and implementation plan to ensure we achieve our climate goals.

## II. Roundtable should include diverse representation.

The state's efforts to reduce VMT will impact all Californians. It is vital that state agencies, MPOs, and ARB board members understand the benefits from higher targets and other state-level strategies to reduce VMT as well as the strategies needed to ensure that VMT-reduction strategies provide broad benefits to residents across the income spectrum. For example, in the Bay Area, resegregation is happening, where many low-income and communities of color are currently priced out of their homes in the urban core and being pushed out to the suburbs, while more affluent white communities are returning to the urban core.<sup>5</sup> If VMT pricing were implemented without taking this factor into account, it could disproportionately raise costs for low-income communities of color who would not have access to the same levels of transit as those located in the urban core. By taking this information into account, strategies can be developed to ensure that our state's interrelated social equity, environmental, and economic goals are maximized.

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<sup>2</sup> ClimatePlan. 2016. "Leading the Way: Policies and Practices for Sustainable Communities Strategies." <http://www.climateplan.org/wp-content/uploads/2016/10/Leading-the-Way-Full-Report.pdf>

<sup>3</sup> California Transportation Commission. 2017. "2017 Regional Transportation Plan Guidelines for Metropolitan Planning Organizations." Appendix L, pg. 309.

<sup>4</sup> Boarnet, M, & Handy, S. 2017. "A Framework for Projecting the Potential Statewide Vehicle Miles Traveled (VMT) Reduction from State Level Strategies in California." [https://ncst.ucdavis.edu/wp-content/uploads/2017/03/State-Level-VMT-Strategies-White-Paper\\_LP\\_EB1.pdf](https://ncst.ucdavis.edu/wp-content/uploads/2017/03/State-Level-VMT-Strategies-White-Paper_LP_EB1.pdf)

<sup>5</sup> Urban Habitat. 2016. "Race, Inequality, and the Resegregation of the Bay Area." <http://urbanhabitat.org/sites/default/files/UH%20Policy%20Brief2016.pdf>

For example, pricing strategies could be developed that enhance transit accessibility for low-income residents. This is why it's important to have diverse representation at the roundtable so all issues can be discussed.

To ensure a robust conversation, the roundtable should include key state agencies such as the California Transportation Commission (CTC), California State Transportation Agency (CalSTA), the Office of Planning and Research (OPR), and the Strategic Growth Council (SGC), the MPOs, and ARB board members. The roundtable should include the Environmental Justice Advisory Committee (EJAC) as well as key stakeholders from across the state to represent issues such as social equity, conservation, public health, and affordable housing.

III. Roundtable should provide ample time to discuss key topics related to SB 375 and reducing VMT.

To achieve the goal of strengthening SB 375 and identifying state-level actions to reduce VMT, it is important that the roundtable provide ample time for discussion. Instead of one single roundtable, there should be a series of roundtables to discuss the following topics:

- a. SB 1 Implementation
  - i. One roundtable should be dedicated to discussing how ARB will work with stakeholders and other agencies to implement SB 1 given that this law now offers millions of dollars annually to help achieve our climate goals. Key topics to discuss around SB 1 implementation include identifying the best transportation metrics for the programs that will track our efforts to reduce VMT and maximize co-benefits; as well as further fleshing out the Local Planning Grants Program. A roundtable focused on SB 1 implementation could create space for MPOs, ARB, Caltrans, and stakeholders to work collaboratively to design this program.
- b. Regional innovations, challenges, and solutions around SB 375
  - i. Around the state, a great deal of regional innovation has occurred around SB 375. At one roundtable, ARB, MPOs, and stakeholders should share their research and observations about the regional strategies that have best reduced GHG while advancing co-benefits such as health and equity. This roundtable could include cutting-edge developments from SB 1, such as the recent passage of the Advance Mitigation Program or the Local Planning Grants Program, that could support further progress. The roundtable could discuss how to use the Local Planning Grants Program to advance the most impactful strategies and address challenges. SB 1 states that the the Local Planning Grants Program is designed to “encourage local and regional planning that furthers state goals, including, but not limited to, the goals and best practices cited in the

regional transportation guidelines.”<sup>6</sup> This roundtable could create space for MPOs, ARB, Caltrans, and stakeholders to work collaboratively to design this program. Finally, regions should also share their challenges, including challenges around SCS development and implementation related to MPOs’ authority to ensure robust implementation of SCSs, to foster a discussion about how state agencies could support them in these efforts.

- c. Pricing policies / State-level VMT strategies, including addressing the equity impacts of state-level VMT strategies
  - i. SB 375 is, at its core, about reducing the need to drive – and associated carbon pollution – through making smart land use decisions and creating transportation choices such as transit, biking and walking. One strategy proven to promote less polluting transportation choices and reduce vehicle miles traveled is congestion pricing, where drivers pay a nominal fee during peak periods to drive in highly congested areas. As ARB contemplates adopting targets that are more in line with California’s ambitious SB 32 and 2050 Executive Order goals, policies that have been proven to reduce vehicle miles traveled will become even more important. But there are legitimate concerns about how to implement pricing policies in a way that is equitable. We recommend that one of the roundtables focus on pricing policies that can deliver needed carbon reductions while also advancing equitable access to transportation choices. Given the concerns that pricing would disproportionately harm low-income communities of color who have been impacted by displacement or are located in communities where they are forced to drive long distances to get to work, school, and recreation, it is critical to understand how we can advance a pricing program that provides real benefits to low-income and disadvantaged communities. A roundtable focused on pricing could start the conversation between the state, regions, and stakeholders to identify what type of pricing program would be needed to achieve VMT reductions while avoiding negative impacts on low-income communities of color.
- d. Transportation Funding at State and Regional level to address funding challenges to implement the Regional Transportation Plans / Sustainable Community Strategies (RTP/SCSs).
  - i. One roundtable should focus on transportation funding at the State and Regional level to address funding challenges to implement the RTP/SCSs. Regions have stated in their recent target recommendations that a number of state actions would be necessary to achieve higher targets. One of those state actions include more funding for transit, walking, and bicycling. While SB 1 provided funding for these modes, regions continue to state that more is needed. In addition, from our own analysis, some current transportation funding pots that have the flexibility

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<sup>6</sup> SB-1 Transportation Funding. 2017.

[https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201720180SB1](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB1)

to fund transit, active transportation, and/or planning grants continue to be prioritized for spending on highways and roads. Further, local self-help sales tax programs have great flexibility to raise funds for transit operations, free youth transit passes, and a range of other activities. A roundtable focused on transportation funding could explore areas of flexibility in existing state, regional, and local funding, identify what additional funding is needed, and generate a range of options for meeting those funding needs, including ways that the state could bolster the regions' efforts to invest in a low-carbon sustainable transportation.

- e. Maximize co-benefits such as conservation, public health, social equity, and environmental justice.
  - i. SB 375 remains essential to land use and planning due to the fact that the SCSs provide an array of co-benefits related to conservation, public health, social equity, and environmental justice. From SANDAG's Environmental Mitigation Program (EMP), which uses \$850M from a sales tax measure to mitigate impacts from future transportation programs, to SCAG developing its own criteria to identify underserved communities, we've seen regions implement a number of new and innovative regional strategies to reduce GHG while maximizing co-benefits such as protecting natural and working lands, improving social equity, and promoting public health. However, not all regions are able to effectively maximize - and measure - the co-benefits achieved from their regional GHG strategies. One roundtable should focus on identifying how all regions can effectively elevate, maximize, and measure all co-benefits, including economic, air quality, preservation of natural and agricultural lands, climate adaptation, public health, environmental justice, and social equity. And co-benefits should not be exclusive to the targets, but should be addressed throughout the entire process, including model improvements and outcomes in the next round of SCSs.

In closing, we are grateful for this roundtable. We believe it will build upon the work from the Scoping Plan and SB 375 targets to help us reduce VMT and achieve our climate goals. We look forward to partnering with you in the development of this roundtable.

Sincerely,

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