



October 18, 2021

Dear Chair Randolph, Members of the California Air Resources Board (CARB), and staff,

Thank you for CARB's acknowledgement of the need to reduce emissions and provide immediate benefits to communities that continue to face disproportionately high levels of air pollution and health burdens from mobile sources, as discussed in the 2020 Mobile Source Strategy ("Strategy"). Leadership Counsel for Justice & Accountability works alongside residents in low-income communities of color in the San Joaquin and Eastern Coachella valleys. Our intersecting transportation, climate, housing and land use work is centered around community members' expressed needs and principles of environmental and social justice. We see first hand the impact of heavy-duty trucking in communities living near warehouses and trade corridors, and the experiences of asthma and other health conditions that plague those dealing with compounding and cumulative impacts of mobile source and other forms of pollution. Additionally, we emphasize the need for stronger land use, transportation and housing planning, which currently holds the State back from achieving climate and equity goals. Below we offer reflections and recommendations for the 2020 Mobile Source Strategy, including:

1. Promoting ZEVs, avoiding "near zero emissions" technologies, and focusing on a Just Transition for goods movement
2. Reducing VMT through meaningful investments equitable mobility projects
3. Strengthening SB 375 and accountability of local jurisdictions to meet GHG requirements and VMT, equity goals
4. Meaningful community engagement

Zero Emissions Trucks & Just Transition for Goods Movement

We appreciate CARB's recognition of the disproportionate and lethal impacts of light, medium, and heavy duty trucks in disadvantaged communities. In each of CARB's rulemakings on trucks, it is crucially important that CARB is replacing polluting trucks with 100% zero emissions vehicles and technologies. We continue to see rules framing natural gas, biofuels, and other dirty fuels that still emit criteria and toxic pollutants as "near zero emission" technologies. The Mobile Source Strategy in particular underpins this branding of natural gas and biofuels as "near zero," when indeed these fuels are significantly polluting and perpetuate harm and environmental racism in disadvantaged communities. We urge CARB to focus its resources and innovation dollars on increasing the feasibility of zero-emissions trucks and transitioning to a just goods movement, instead of incentivizing and misbranding polluting alternatives that externalize their costs in the forced sacrifice and public health of disadvantaged communities.

Reducing VMT through equitable mobility projects



As CARB discusses in Chapter 6 of the Strategy, zero emissions vehicles -- while they address critical pollutants and air quality concerns from vehicles -- are not enough to fundamentally address challenges of equitable, clean mobility in transportation. The State must also aggressively implement and support equitable projects that improve mobility, reliability, and reduce VMT through a community engaged process. Including but going beyond providing incentives for lower income individuals to purchase EVs, other types of VMT-reducing, place-based mobility options are critical. CARB has already invested in some such efforts, like the Sustainable Transportation Equity Program (STEP), discussed in Strategy 1, but the investments pale in comparison to the billions of state budget dollars going into consumer ZEVs. Comparatively low amounts of money have been set aside for equitable, reliable, community-identified mobility options that do not involve single passenger vehicles, despite the emphasis on VMT reduction. Funding going into active transportation, zero emission vanpools or flexible shared mobility options, particularly in rural or less transit-connected areas, is inadequate.

Strengthening SB 375 and accountability of local jurisdictions to meet GHG requirements and VMT, equity goals

Additionally, the State continues to struggle with how to meaningfully change the land use patterns that contribute to deeply problematic development at the expense of environmental justice communities--Black, Brown, and low income areas communities across the state. Local and regional jurisdictions that are responsible for land use decision making are consistently failing to meet transportation planning GHG reduction requirements under SB 375, and from what we have seen in the counties where we work, they are not prioritizing or making progress to reduce VMT or address equity in the current RTP/SCS process (or past processes). Projects identified by and located in low income communities of color, who have long been excluded from beneficial community investments and burdened by oppressive land use practices, consistently fall to the back of the RTP/SCS project lists or fail to be included at all. These community identified projects that increase mobility and access through active transportation infrastructure, and innovative transit programs, for example, are exactly the types of investments that further both transportation equity and GHG emission reduction goals. Furthermore, CARB mentions that “disallowing leapfrog development out in natural or agricultural areas are known land use strategies for supporting VMT reduction” (p. 119) but should also recognize that this type of development also happens in low-income rural and fringe/legacy unincorporated areas, disregarding the longstanding needs of existing communities (i.e basic water/sewer and sidewalks), disproportionately those of color.

CARB discusses several potential changes to SB 375 to add VMT targets, identify implementation actions, and increase monitoring and reporting, but falls short of identifying a direct funding mechanism that would achieve much-needed accountability within the SB 375 process. In addition to the changes identified, CARB should include a discussion of ways in which they can work with the California Transportation Commission, Caltrans and other relevant agencies to better hold regions accountable to GHG, VMT and equity goals, strengthen the SB



375 Equity Analysis potentially by connecting to the in-development Equity Index being developed by Caltrans, strengthen Affirmatively Further Fair Housing components, have more accountability and transparency in the public process, and CARB should consider scenarios where state funds are withheld from inequitable, criteria pollutant and GHG-increasing projects, for example. Despite the “structural factors” that “make it difficult to align SCS planning and transportation funding allocations,” it is not acceptable for regions to continue to fail to meet their goals for the 14 years since SB 375 passed, while also failing to improve outcomes and processes for overburdened and underinvested-in Black and Brown communities.

Meaningful community engagement

When communities are deeply engaged, over time, and have a sense of ownership over transportation projects, there is more potential that alternative and VMT-reducing projects will succeed if they are well-funded and supported. It is important that CARB has acknowledged the need for meaningful, equitable community engagement to understand not only the needs, but nuances, norms and challenges of specific communities, including low income rural communities, unincorporated areas, and urban neighborhoods in inland California. Engagement also includes long-term relationship and trust building, which often can not be measured or quantified. However, CARB must work with relevant agencies and throughout the Scoping Plan process, related to the Strategy, to ensure that the most impacted communities are driving equitable solutions in their own neighborhoods and are engaged throughout the entire process.

Sincerely,

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