

Transportation Solutions Defense and Education Fund

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Posted to:

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Mary Nichols, Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Comments on Potential State-Level Strategies to Advance Sustainable, Equitable Communities and Reduce Vehicle Miles of Travel (VMT).

Dear Ms. Nichols:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental non-profit advocating for the regional planning of transportation, land use and air quality, with a focus on climate change. We consider reducing VMT to be our primary mission. We strongly support ARB's efforts to design programs to achieve the state's GHG emissions reduction targets. We are proud that California wants to demonstrate to the world how to do it. We hope you find our outsider perspective as real-world transit advocates useful as you update the Scoping Plan.

We attended the public workshop on the Transportation Sector to Inform the 2030 Target Scoping Plan Update, and reviewed the Potential State-Level Strategies to Advance Sustainable, Equitable Communities and Reduce Vehicle Miles of Travel (VMT). While our comments primarily address that document, we also make comments on ARB's overall transportation strategy and incorporate by reference our 2015 comments on the Scoping Plan Update to Reflect the 2030 Target, as they are still entirely relevant. They are available at: <https://www.arb.ca.gov/lists/com-attach/3-2030targetsp-ws-WmgCNFdnA2VSCwZz.pdf>

The Paper's Fundamental Premise is Untrue

The frame for the paper is the presentation of potential additional strategies to reduce VMT. This necessarily implies the existence of effective strategies already in place. In reality, while the rhetoric of state and regional agencies now call for a reduction in VMT, their actual decisions--and especially their funding priorities--are still firmly stuck in the highway-focused mentality of the last century. The vast majority of funds allocated by the CTC goes to highways, and are likely to induce additional VMT. Many local jurisdictions reject any responsibility whatsoever for VMT, even in their rhetoric. (See 2015 comment letter.) The results to date of the highlighted existing strategies (SCS--

the other two have not even been implemented) are minimal at best. Local and regional plans continue to show sharply increasing VMT.

Twenty-five years ago, the State of Oregon adopted its Transportation Planning Rule, which directed its localities to better connect land use plans with transportation plans. That law, and its implementation, was highly successful. Oregon now has a significantly lower VMT per capita than the rest of the U.S. Until California does something far-reaching like that, VMT will continue to increase with population.

TRANSDEF fully recognizes how controversial an effective program to reduce VMT will be. We surmise that the current dismal state of affairs in VMT reduction policy is the result of high-level decisions to avoid controversy. This "Potential State-Level Strategies" paper is clearly the product of such decisions, as it fails to propose any impactful strategies to reduce VMT, despite knowing what would work. It is curious that the senior agency officials that signed off on this paper publicly support VMT reductions while privately opposing the very policies that would actually accomplish them.

As environmentalists working for decades to reduce VMT, we would prefer candor from those officials, in the recognition that, essentially, this is an education problem. Most of the population continues to believe in the traffic fairy: If only we support the next sales tax or bond measure, the traffic fairy will make traffic congestion vanish. The public needs to be educated--by leaders it respects--that the time is coming to a close when it is possible in metropolitan regions for most residents to commute by solo driving.

Because the Potential Strategies paper does not confront this central problem of transportation, adopting the paper as-is into the Updated Scoping Plan will prevent the State from controlling its largest GHG emissions category, motor vehicles. A failure to control VMT almost certainly means a failure to achieve AB 32 and SB 32 goals.

Increasing Infill Development

The State needs to create a fundamental economic advantage for infill development, if it is serious about achieving results. Auto-dependent development--sprawl--should be strongly disincentivized by a stiff impact fee based on added VMT. This could possibly be structured as an indirect source mitigation fee. The fee needs to be high enough to take the profit out of sprawl development. (This is entirely equitable, since much of the profit in the sprawl business model comes from externalizing the cost of access.) The playing field for infill development needs to be more than just level--it needs to be tilted towards infill, to compensate for its inherent difficulties.

Adoption of legislation modeled on Oregon's Transportation Planning Rule would help Shift land use practices in a sustainable direction.

Infrastructure Investments

The fundamental problem in infrastructure is not "identifying and prioritizing projects." The problem is that transportation funding has long been a preferred vehicle for conferring political benefits. Projects consistently get funded not because of their merits, but because of their sponsors. This wastes vast amounts of scarce public capital. Until

that capital can be focused on the transit infrastructure needed to provide convenient alternatives to solo driving, VMT reduction will not happen. This will require a change in the expectations of politicians as to the scale of favors they are able to confer on their benefactors.

The paper's proposals for increasing transit mode share are not going to result in significant mode shift unless there is a sea change in where the bulk of the State's transportation funds are spent. The infrastructure section of the paper will not benefit VMT reduction unless its first policy is to eliminate funding for projects that increase VMT.

This writer is currently traveling in Switzerland, a country that has invested intensively in its rail infrastructure. It appears possible to get to anywhere in the country without a car. None of this is complicated or even all that difficult, once the political realization dawns that mobility in metropolitan regions primarily reliant on the automobile can only continue to decline. Switzerland, for example, has a unique investment-prioritizing process, which consistently seeks to optimize system performance by strategic incremental improvements.

Driverless Cars

It is understandable that desperate transportation planners would latch onto autonomous vehicle technology as a life raft in response to the sinking ship of auto mobility. However, they miss a glaring problem: making it easier for anyone, of any age, to "drive" solo will inevitably greatly increase VMT. Roadway congestion (and GHG emissions, supposedly) are the only limiting factors to the explosion of this technology.

The thought process behind "Continue to study and develop policies around driverless vehicle technology that promote sustainable and equitable land use and reduce VMT" is completely backwards. Because the technology was developed to foster independent travel, it encourages unsustainable sprawl development. This section needs to be totally rewritten to express concern about the great harm this technology will do to the State's sustainability policies.

As an example of clear thinking on this technology, see: <http://humantransit.org/2015/11/self-driving-cars-a-coming-congestion-disaster.html>

Pricing

Yes, it's true that "Several extensive studies have found pricing to be among the most impactful long-term VMT and GHG reduction strategies for the transportation sector." Despite the fact that the Potential State-Level Strategies paper has no other impactful strategies to offer, it balks on proposing any serious pricing (it's all study this and explore that...). All-lane highway pricing would do more for VMT reduction than anything else in the paper. If we recognize that highway congestion is the simple laws-of-supply-and-demand result of many decades of underpricing, it should be obvious that gradually increasing pricing will correct the market distortions over time.

It is equally obvious that pricing is politically terrifying. If we are at all serious about VMT reduction, we will inevitably end up having to deal with bringing the public along in implementing pricing, so why not start the discussion now? TRANSDEF advocated for two decades on the need to build convenient cost-effective transit, so that alternatives will be in place to give road users a choice of mode when pricing commences. MPOs like MTC have maximized the difficulty of a transition to a pricing regime by refusing to commit their resources that way. They were instead focused on policy disasters like Express Lanes.

Express Lanes are a Strategy to Increase VMT

By providing facilities for solo drivers to avoid congestion, Express Lanes encourage the very behavior this paper's strategies are meant to discourage. It would be hard to find a worse strategy for reducing VMT than "Develop additional highway express lanes" unless it would be to make this the top pricing strategy.

HOT lanes are an artifact of the capacity-is-everything mindset of the previous century. The myopia of that mindset, which sees solo driving as the basic module of transport, prevents its practitioners from recognizing that solo driving is the fundamental problem of transportation. Instead of the old way, contemporary planners need to see solo driving as a failure of community design.

High-Speed Rail

We incorporate by reference our oral and written comments and attachments on the 2014 Scoping Plan Update. In those comments, we provided evidence that the HSR project currently underway will result in a net increase in GHGs that will last through at least two decades of operations. ARB failed to independently review CHSRA's GHG analysis, resulting in the Chair endorsing a deeply flawed analysis. TRANSDEF is currently in litigation on this matter with ARB.

In short, unless HSR can be conclusively demonstrated to reduce GHGs in the long and short term, using comprehensive life cycle analysis methodologies, it cannot be included in the updated Scoping Plan as a GHG emissions reduction measure.

CTP 2040

The recently adopted California Transportation Plan 2040 failed to meet the legislative mandate of SB 391. (See TRANSDEF comment letter on the Draft CTP Guidelines, available at: http://www.dot.ca.gov/hq/tpp/offices/osp/ctp_files/comments/4DavidSchronnbrunn_Transdef.pdf) Perhaps the single most important action ARB can take to reduce VMT is to arrange for all State agencies to rescind their approvals of the Final Draft CTP 2040, and adopt the first public Draft CTP 2040 instead. That document did far more than "address" the 80% GHG reduction called for by law--it provided recommendations on how to get there.

Conclusion

TRANSDEF recognizes the difficulties faced by ARB in leading the charge towards low-carbon lifestyles. We appreciate this opportunity to comment on the Update to the Scoping Plan. We would be pleased to assist in the implementation of these ideas.

Sincerely,

/s/ DAVID SCHONBRUNN

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President
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