



June 22, 2018

Fran Inman, Chair
California Transportation Commission (CTC)
1120 N Street MS 52
Sacramento, CA 95814

Mary Nichols, Chair
California Air Resources Board (ARB)
1001 "I" Street
Sacramento, CA 95814

Sent via email and submitted to the ARB public comment docket for AB 179

Re: Transportation Justice Comments for the First Joint California Air Resources Board and California Transportation Commission Public Meeting

Dear Chair Inman and Chair Nichols:

The undersigned organizations represent a broad cross-section of stakeholders that are actively involved in improving our state’s transportation system — particularly for low-income people and people of color.

We are pleased to see that the California Transportation Commission (CTC) and the California Air Resources Board (ARB) are beginning to close the inter-agency disconnect between the two agencies. This is a positive and desperately-needed step in order to achieve our shared state, regional, and local goals for air quality, greenhouse gas reduction, vehicle miles traveled reduction, and social equity.

While these beginning inter-agency steps will eventually bring the state closer to meeting these goals, and the vision and statutory mandates that undergird them, **we are writing to recommend**

that much more action, policy development, and directed funding is needed by both the CTC and ARB — independently and in alignment — to ensure that the mobility, safety, and economic needs of our most neglected, vulnerable, and marginalized community residents receive meaningful and equitable benefits. For example, since both CTC and ARB oversee and collaborate with Metropolitan Planning Organizations (MPOs) and Regional Transportation Planning Agencies (RTPAs), **we recommend increased coordination at the local and regional level as an opportunity to foster better outcomes on all of these goals.**

To that end, we recommend that the CTC and ARB begin to incorporate transportation justice as part of future formal state administrative capacities (please see attached as Appendix A, What is Transportation Justice?). This guiding document will help frame how to fairly and equitably integrate the state's other transportation goals of economic growth, efficiency, competitiveness, and the safety and reliability of our transportation system, with overarching goals of fairness and equity.

At present, transportation decision-makers often overlook these principles. This is even more unfortunate, and unjust, when the distribution of benefits and burdens of our transportation investments are skewed. Historically, publicly-funded federal and state transportation subsidies, projects, and policies are severely unbalanced, favoring private investors, including some of our most egregious polluters, emitters, and degraders. Current research shows that unpriced external costs specifically of freight transport directly and indirectly amount in billions of subsidies to industries.¹ Consequently, many transportation investments continue to deliver more burdens than benefits to our most underserved and overburdened communities.

We look forward to continuing to work with you on incorporating transportation justice into the policymaking and implementation process to ensure that the coordinated investments of both agencies, and the regional agencies they are charged with overseeing, truly benefit, and do not harm, the most marginalized and neglected community residents.

Sincerely,

Jared Sanchez, Senior Policy Advocate
California Bicycle Coalition

Angela Glover Blackwell, CEO
PolicyLink

Richard Marcantonio, Managing Attorney
Salem Afangideh, Transportation Justice Policy Advocate
Public Advocates Inc.

¹ See Austin, David (2015). *Pricing Freight Transport to Account for External Costs*. Congressional Budget Office. Accessible here: <https://www.cbo.gov/publication/50049>. Also see a recent summary, Cortright, Joe (2015). *The Real Welfare Cadillacs Have 18 Wheels*. City Observatory. Accessible here: <http://cityobservatory.org/the-real-welfare-cadillacs-have-18-wheels/>.

Jonathan Matz, California Senior Policy Manager
Safe Routes to School National Partnership

Ella Wise, State Policy Associate
ClimatePlan

Dr. Adonia E. Lugo, Advisory Board Co-Chair
Multicultural Communities for Mobility

Tony Dang, Executive Director
California Walks

Alvaro Sanchez, Environmental Equity Director
The Greenlining Institute

Bob Allen, Director of Policy and Advocacy Campaigns
Urban Habitat

Grecia Elenes, Policy Advocate
Leadership Counsel for Justice and Accountability

Cc:

Susan Bransen, Executive Director, CTC
Garth Hopkins, Deputy Director - Planning, CTC
Richard Corey, Executive Officer, CARB
Steven Cliff, Deputy Executive Officer, CARB
Ashley Georgiou, CARB

Appendix A. What is Transportation Justice?

Transportation connects people to places, and is a major determinant of access to opportunity and economic mobility, and health outcomes. It powerfully shapes both the location and the nature of development and land-use and reflects the stark and historic inequities impacting low-income communities of color. This can take many forms: a low-income suburban subdivision with no transit access, luxury condominiums a short walk from a rail station, a school bus stop along a dangerous highway shoulder in a rural unincorporated community, or a warehouse district in the middle of a census tract with the highest child asthma rates in the state. In short, transportation creates both benefits (like access to opportunity) and burdens (like increased risk of displacement or exposure to toxic emissions).

Transportation justice recognizes that these benefits and burdens do not fall equally on all. While patterns of disinvestment and neglect have left low-income Black, Indigenous and people of color communities and our most vulnerable - undocumented, immigrant, queer, trans*, people with disabilities, elders, youth, etc. - without safe, affordable, and efficient transportation options, they are also home to some of the highest rates of toxic exposure, asthma, and other public health impacts exacerbated by the transportation sector. **Thus, transportation justice entails an affordable, accessible, sustainable, clean, efficient, and safe transportation system that provides the greatest mobility and safety benefits and other co-benefits to our most vulnerable residents, while protecting them from harm.**

California's transportation system has been built primarily to facilitate single occupancy vehicles and goods movement, and leapfrog development patterns, investing over many decades largely in roads and highways that have subsidized sprawl. This pattern of investment in highway development has literally damaged, destroyed, and divided existing low-income communities and communities of color. Historically, California and federal transportation policies have engendered "white flight" from central cities to suburban development at the exclusion of low-income communities. Now, as urban centers continue to repopulate, the reverse is happening, where higher-income white households displace established communities of color. Transportation policies often facilitate this process with new investments that directly serve newer and wealthier city center residents. Elsewhere in these regions, rural communities and growing numbers of low-income inner-ring suburbs, communities lacking transportation systems that facilitate opportunity or provide even basic safety, take on greater numbers of low-income people of color. Continued sprawl, newer forms of displacement, and pollutant-emitting vehicles leave us with unsustainable patterns that persist today and are supported by California's transportation policies that maintain economic, social and racial inequality.

In addition to the economic and social burdens of California transportation policy, our freeways and goods movement infrastructure place disproportionate air quality burdens on low-income communities of color. Mobile sources are primarily responsible for nitrogen oxide emissions which create the most significant pollution burdens on vulnerable populations. Disadvantaged communities located in close proximity to freeways and absent of transportation alternatives, are exposed to heightened environmental justice burdens, such as high particulate matter and ozone exposure.

These air pollutants impact community health outcomes and result in high concentrations of cardiovascular disease, cancer, asthma as well as developmental delays in children.

Consistent and continued prioritization of highway development with our transportation funding has come at the expense of investments in convenient transit, walking, and bicycling, which are healthy, affordable, and sustainable modes that low-income people often rely on by necessity. Equitable transportation policies can reverse this pattern of investment and ensure that Californians with the greatest needs receive the most benefit from future investment. A key obstacle to this is that transportation decision-making continues to be dominated by the roads and highway interests, the logistics and goods movement industries, the oil industry, and is completely devoid of voices and representation from low-income communities and communities of color at the state and local levels.

Advancing transportation justice requires that transportation investments “meaningfully address important community needs” identified by residents of marginalized communities. These communities have been historically and continue to be displaced (particularly the Indigenous communities of the land who were originally displaced) by transportation investments and those who continue to bear the harms of transportation infrastructure, while receiving little to no meaningful benefit. Transportation justice not only creates pathways for improved access to opportunity, and cleaner climate, air quality, and transportation investments in California’s most vulnerable communities, it also opens access to economic opportunity and shared prosperity by providing millions of marginalized Californians with reliable connections to jobs, healthcare, schools, networks, as well as other critical amenities and services. At the most basic level, mobility is a fundamental right and any infringement on the way people move around is unjust at its core.

Through transportation justice, we seek to advance a broad and bold agenda that transforms our transportation system and related policies in order to achieve economic and social justice in California. In the end, **we seek to counter and redress the effects of structural inequalities — based on white supremacy, settler-colonialism, heteropatriarchy, and ableism, and maintained by transportation and land use planning and policies — that ultimately act as a barrier to opportunity and social and economic mobility.**