



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

April 10th, 2017

Dear Chair Mary Nichols and Members of the Air Resources Board,

First, we want share our appreciation for your leadership and commitment to ensuring our state has a strong, coordinated plan in place to achieve our 2030 climate goals. The 2030 Scoping Plan will shape our state’s future actions, and it is important that it provides a clear roadmap for all sectors to reduce greenhouse gas emissions and provide real benefits to all Californians.

Our coalition would like to make sure that the 2030 Scoping Plan includes a clear strategy to reduce greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) from all sectors including the transportation sector.

As new data released this month from the UC Davis Institute of Transportation Studies and the National Center for Sustainable Transportation affirms, reducing vehicle miles traveled can result in a multitude of co-benefits, including increased physical activity, reduced costs, and improved air quality.¹

Below we offer our recommendations to strengthen the draft 2030 Scoping Plan’s efforts to reduce GHG emissions.

¹ National Center for Sustainable Transportation. (2017). Cutting Greenhouse Gas Emissions Is Only the Beginning: A Literature Review of the Co-Benefits of Reducing Vehicle Miles Traveled. https://ncst.ucdavis.edu/wp-content/uploads/2017/03/NCST-White-Paper-VMT-CoBenefits-White-Paper-LP_EB_LI.PDF

1. Pursue ambitious SB 375 targets that align with SB 32, maximize co-benefits, and benefit disadvantaged communities
2. Elevate reductions from VMT in the 2030 Scoping Plan by including:
 - a. Establish a 7.5 percent reduction as the target for VMT, and
 - b. Key statewide and regional strategies to reduce vehicle dependence.
3. Encourage stronger coordination with the Legislature and state agencies including Caltrans, California State Transportation Agency (CalSTA), and the California Transportation Commission (CTC) to ensure all transportation and planning efforts achieve our 2030 climate goal.
4. Evaluate the health impacts of Scoping Plan measures and scenarios in both the plan document and Environmental Impact Report (EIR).
5. Support implementation of SB 743.
6. Advance recommendations put forth by the Environmental Justice Advisory Committee (EJAC) as related to reducing VMT.
7. Include a clear and quantifiable climate goal for natural and working lands.
8. Set local percentage reduction goals commensurate with state targets; remove per capita goals.

Below we describe these recommendations in more detail.

1. Pursue ambitious SB 375 targets that align with SB 32, maximize co-benefits, and benefit disadvantaged communities.

While the state has set out ambitious goals for reducing greenhouse gas emissions, the 2030 emission reduction mandate is not well aligned with regional GHG reduction efforts under SB 375. The Scoping Plan must provide greater guidance and direction to support more ambitious targets.² We recommend that the 2030 Scoping Plan include explicit language calling for higher SB 375 targets for MPOs. This language should emphasize that more ambitious SB 375 targets will help the state achieve its 2030 emission reduction mandate, as well as maximize co-benefits such as increased physical activity, improved air quality, reduced transportation costs, and preservation of natural and working lands. Finally, the language should recommend that the SB 375 targets also provide direct benefit to low-income / disadvantaged communities.

Without explicit direction in the 2030 Scoping Plan, we remain concerned that some regions may not seek out more ambitious land use and transportation strategies to transform their regions into more walkable, bikeable, transit-friendly communities that achieve significant greenhouse emission reductions. In addition, a failure to pursue higher regional SB 375 targets could conflict with and hinder achievement of strong climate action plans that many individual cities have

² ARB Workshop Presentation. March 9, 2017.
https://arb.ca.gov/cc/sb375/sb_375_march_workshop_presentation_sacramento.pdf

adopted or are considering adopting. ARB's own research suggests that we will need more ambitious SB 375 targets to achieve our state climate goals.

2. Elevate reductions from VMT in 2030 Scoping Plan by including *both* of the following:

A. Establish a 7.5 percent reduction as the target for VMT.

In ARB's March 2017 workshops, the Scoping Plan Scenario showed that additional VMT reductions above adopted SCS achievements are needed to meet our 2030 emission reduction mandate. ARB's own research shows that the state needs to reduce VMT by 7.5 percent by 2030 to achieve the emission reduction mandate. Numeric targets are incredibly helpful to track progress as well as ensure the state and regions achieve their goals. We recommend that the 2030 Scoping Plan include the 7.5 percent reduction from VMT as a numeric target to advance our first recommendation as well as provide a clear target for both the state and regions to meet.

B. Include key statewide and regional strategies to reduce vehicle dependence.

Since the draft Scoping Plan was released, a white paper prepared for the Strategic Growth Council entitled "A Framework for Projecting the Potential Statewide VMT Reduction from State-Level Strategies in California"³ has outlined key state-level strategies to reduce VMT. Last year, ClimatePlan also released a report entitled, "Leading the Way: Policies and Practices for Sustainable Communities Strategies."⁴ This report highlights key land use and transportation strategies that reduce VMT and maximize co-benefits.

If ARB finds that regional targets cannot rise to the level necessary to reach the state's climate goals, we recommend the 2030 Scoping Plan identify specific, realistic state strategies that can close this gap. These strategies should be as specific as possible, quantifying the climate benefits of particular strategies wherever possible and identifying the responsible state agencies who can take the lead on their implementation. We recommend the 2030 Scoping Plan include (but not limited itself to) the following strategies:

- **Promote transit oriented development that serves the needs of residents across the income spectrum:** California needs stronger approaches to guide growth near transit and ensure that this growth serves the needs of low-income residents. In particular, the production and preservation of affordable housing and anti-displacement strategies in areas near transit can help ensure that low-income residents have access to transit. Focusing on strengthening the jobs-housing fit is

³ National Center for Sustainable Transportation. (2017). A Framework for Projecting 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

⁴ 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>

another strategy to reduce VMT versus emphasizing a distributed mix of uses of land within a given geography.

- **Guide investment to rural communities' land use and transportation policies:** The 2030 Scoping Plan should recommend that rural communities shift their investments away from sprawl-oriented development and focus on strategies such as infill development in existing communities.
- **Include performance metrics for transportation investments:** Ensure that capital expenditures are in alignment with SB 375 targets by evaluating them according to their potential to contribute to VMT reductions. Projects that don't fit with the current-day planning paradigm should not receive public funding.
- **Develop clear strategies to meet active transportation goals.** We strongly support the draft plan's ambitious goals for active transportation. However, the draft plan does not include feasible strategies to achieve these goals and does not reflect the goals from other state plans such as the Caltrans Strategic Management Plan and new Statewide Pedestrian and Bicycle Plan. We recommend the 2030 Scoping Plan include stronger policy commitments with clear implementation actions for active transportation as well as greater coordination with other agencies such as Caltrans.

3. Encourage stronger coordination with the Legislature and state agencies including Caltrans, California State Transportation Agency (CalSTA), and the California Transportation Commission (CTC) to ensure all transportation and planning efforts achieve our 2030 climate goal.

Last week, the Legislature approved a ten-year \$5 billion/year (\$52 billion total) transportation funding package. To ensure expenditures from this package are aligned with state climate goals as stated by ARB board members last month and achieve our 2030 climate goals, we will need all state agencies to work together to ensure our transportation investments and planning efforts align with our climate target reductions. We recommend the 2030 Scoping Plan assign the agencies listed above with responsibility for key statewide VMT reduction strategies (as related to the agency's mission) and include a clear implementation timeline so these efforts are completed in a timeframe to meet the 2030 target. We also recommend that the 2030 Scoping Plan include language that encourages the state agencies listed above to regularly meet to discuss their efforts to reduce VMT and any funding packages / investments that may impact our climate goals.

4. Evaluate the health impacts of Scoping Plan measures and scenarios in both the plan document, and Environmental Impact Report (EIR).

We support the comments submitted by the Public Health Alliance of Southern California, the Public Health Institute and the American Lung Association in California calling for a greater analysis of the health impacts of the Scoping Plan. We are pleased that ARB included high-level

health and equity discussions in the 2030 Scoping Plan, and provided a general overview of the connections between health and the Scoping Plan. However, we remain concerned that this overview does not currently analyze the specific health impacts of the differing strategies and scenarios. We note that it is also missing an analysis on the relative contributions of both health benefits and impacts as they affect population sub-groups.

We recommend that ARB fund an independent consultant with experience in the comprehensive analysis of health impacts to conduct a health equity assessment of the strategies and alternatives in the Scoping Plan. This study should assess the expected magnitude and distribution of health costs and benefits for each strategy. It should also include projected changes to physical and mental health resulting from the strategies proposed in the Scoping Plan, including land use and transportation patterns, green infrastructure, energy efficiency, building design, and air quality. This analysis must assess the distributional impacts and benefits of strategies and scenarios in different sub-groups of California's population. This stronger health analysis is needed to fulfill AB 197 and CEQA requirements.

5. Support implementation of SB 743.

The draft 2030 Scoping Plan and Appendix C mention Senate Bill 743 (Steinberg) several times. This law establishes VMT, rather than Level of Service (LOS), as the principal transportation metric for determining environmental impacts under CEQA, and will be a useful tool to help us achieve our 2030 climate goal. However, the state's SB 743 guidelines have been held up for over a year, resulting in many lost opportunities to improve land use and transportation decisionmaking in furtherance of our state climate goals. We recommend that ARB work with OPR to advance and accelerate the implementation of SB 743. We also recommend that the Scoping Plan explicitly call out SB 743 as a critical strategy to help us meet our climate goals.

6. Advance recommendations put forth by the Environmental Justice Advisory Committee (EJAC) as related to reducing VMT.

We are very supportive of the recommendations provided by the EJAC in relation to reducing VMT and advancing sustainable, equitable communities. We recommend that ARB continue to work with the EJAC to incorporate these recommendations into the Scoping Plan, especially those related to community engagement, transportation investments in disadvantaged communities, natural resources and public health impacts.

7. Include a clear and quantifiable climate goal for natural and working lands.

We recommend that CARB include a GHG reduction goal for natural and working lands to achieve at least 5 million metric tons of reductions in carbon dioxide equivalent (MMTCO_{2e}) annually by 2030. Based on a preliminary analysis⁵, this would be a relatively conservative goal

⁵ The Nature Conservancy of California. Internal Analysis of GHG Reduction Potential for Natural and Working Lands. 2017

for this sector. This goal could be achieved through activities such as managing forests to increase carbon stocks, urban forestry, reforestation, wetland restoration, avoided conversion, and a variety of rangeland and agricultural land management activities, among others.

8. Set local percentage reduction goals commensurate with state targets; remove per capita goals.

In line with Climate Action Campaign's comments on the 2030 Scoping Plan, we recommend ARB to remove the per capita reduction targets from the draft 2030 Scoping Plan and replace them with goals that are consistent with our statewide emission reduction mandate.

In closing, thank you for your leadership on this issue, and your consideration of our recommendations. We look forward to continued work with you to ensure a sustainable and healthy future for our state.

Sincerely,

Nikita Daryanani, Policy Advocate
Leadership Counsel for Justice and Accountability

Nicole Capretz, Executive Director
Climate Action Campaign

Joshua Stark, Policy Director
TransForm

Bonnie Holmes-Gen, Senior Policy Director, Air Quality and Climate Change
American Lung Association in California

Michelle Passero, Senior Climate Policy Advisor
The Nature Conservancy

Bill Sadler, Senior California Policy Manager
Safe Routes to School National Partnership

Chuck Mills, Director of Public Policy and Grants
California ReLeaf

Reverend Earl W. Koteen, Member, Coordinating Committee
Sunflower Alliance

Bryn Lindblad, Associate Director
Climate Resolve

Linda Rudolph, Director
Center for Climate Change and Health

Chanell Fletcher, Associate Director
ClimatePlan

Matt Baker, Land Use and Conservation Policy Director
Environmental Council of Sacramento