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Clerk's Office
California Air Resources Board
1001 I Street
Sacramento, CA 95814
<https://ww2.arb.ca.gov/applications/public-comments>

RE: Draft 2022 Scoping Plan

Dear Chair Randolph,

Thank you for the opportunity to comment on the Draft 2022 Scoping Plan. The Draft Scoping Plan represents years of outreach, analysis and dedication from the ARB staff, board, partners, and Environmental Justice Advisory Committee. We appreciate the work of staff and the board to implement Senate Bill 32.

The California Association of Councils of Governments (CALCOG) is a non-profit organization formed to serve regional governments across the state. These include Metropolitan Planning Organizations (MPOs), Regional Transportation Planning Agencies (RTPAs), and County Transportation Commissions, all of which are responsible for transportation planning and delivery across the state.

Our focus is Appendix E: Sustainable and Equitable Communities. The Scoping Plan is a wide-reaching document that covers many different components needed to achieve carbon neutrality by 2045. Our comments are focused on the transportation sector and more specifically on the goals, objectives, and actions around reducing vehicle miles traveled (VMT).

More clarification is needed regarding the use of VMT as it relates to Senate Bill (SB) 375 implementation. The draft plan sets a goal to reduce VMT per capita by 12-percent by 2030 and by 22-percent by 2045 (from a 2019 base year). Table 2-2 of the plan references SB 375 as statute supporting this "Action". This is confusing because SB 375 requires ARB to set regional greenhouse gas (GHG) reductions targets (per capita) instead of VMT. Also, the base years are different (2005 for the current round of regional GHG targets vs. a VMT reduction based on a 2019 base year).





While VMT and GHG are closely related, VMT reduction is not a perfect proxy for GHG reduction. We understand that the purpose of the VMT goal in the Scoping Plan is to show the level of VMT per capita reduction needed to achieve carbon neutrality by 2045. We appreciate this type of quantification of the issue. But it's difficult to understand what is needed in terms of GHG reduction and it is not initially clear how this VMT goal might be used in the next SB 375 GHG target setting. The relationship between the VMT goal and SB 375 should be more clearly framed and easy for all to understand.

Appreciate State objectives but more clarity and more partnership are needed. We support the framework for action and the state objectives outlined in the Scoping Plan. We appreciate that they are state objectives and the clarity in the document about the state having a role implementing them. We recommend that ARB develop a process for prioritizing the 27 implementing actions under each objective so that the near-term focus can be on those actions that have the most substantial impact on reducing VMT. For example, we think the actions around authorizing and supporting pricing strategies in the regional Sustainable Communities Strategies (SCSs) is a higher priority and will have significantly more impact in terms of reducing VMT than the proposed action to "require greater consistency between RHNA and SCSs".

Also, many of the actions listed are necessary for successful implementation of the ambitious regional SCSs. We are happy to see state accountability for many of these actions and to help implement these plans. However, it's difficult to understand which state actions are aimed at achieving VMT and/or GHG reductions beyond what is achieved in current regional SCSs. Having MPOs as partners in the process to prioritize actions might also help clarify this.

Balanced approach to reconsidering past commitments. The report says that the state must reconsider past transportation funding commitments and their ability to meet our climate goals. But as the recent Assembly Bill (AB) 285 report notes, a balance between keeping past promises and advancing current objectives will be important in that process. The process should consider all the merits of a project including safety, economic prosperity, goods movement, community engagement, and how far along it is in the planning and/or construction phase.

In addition, most current projects are analyzed under current conditions- not the conditions anticipated and called for in the Scoping Plan. For example, a roadway capacity project might increase highway capacity under the current unpriced system but there is the potential for the performance to change dramatically under a system that is priced in a way that will allow the state to achieve its goals. More work is needed before the state commits to an evaluation process that is limited in its review.

Although there are benefits to evaluating pipeline projects for potential improvements, there are also significant costs that should be considered. Many transportation projects take 10+ years from conception to completion. Abandoning projects midway through the cycle or half constructed is a waste of public resources and undervalues the original need for the project. A better solution is to



focus on future projects in the conception phase. Not only how to help shape them to achieve climate and equity goals but also to move through the long transportation planning and funding process quicker.

Resolving tension between competing state objectives while recognizing that one-size does not fit all. In keeping with the theme that policy objectives don't always perfectly correlate, we note that there are often policy conflicts and solutions are often nuanced. The Scoping Plan's purpose is to prioritize the state carbon neutrality goals and how to achieve them. However, there are many other state plans prioritizing other state goals. We raise this as a question about how to balance these goals and not to discount the importance of the Scoping Plan and climate policies. There is no framework to resolve these issues when each state agency is judging performance based on its own set of goals. The recent AB 285 report notes that more work is needed to align all state goals and programs. We think that is an important first step before successfully evaluating pipeline projects and considering changes to broader transportation funding programs. We are not seeking a resolution of this issue within the Scoping Plan itself. We believe that its important to acknowledge that these tensions exist and note the importance of working across state agencies and with regional partners to resolve them.

As one example to better illustrate this point, many rural projects are a direct response to the impacts of a changing climate, focused on improving the safety and operation of roadways which often serve as the only evacuation route in the case of a wildfire or other severe weather event. Such projects may include parallel capacity, roadway and bridge maintenance, general system preservation, or new roadway alignments which provide a secondary egress for rural neighborhoods. This is different than the Scoping Plan's focus to reduce VMT and GHG. Conversations about aligning all state funding to climate goals from a narrow perspective (of VMT reduction) would result in many rural communities being cut off from state funding they rely on. Applying a singular approach, will limit rural regions' ability to contribute to the climate change goals as well as maintain the existing and planned rural transportation infrastructure that is often critical for climate resiliency.

Thank you again for your consideration of our comments. We are happy to provide more detail on any of this as needed. Our desire is to be good partners in the state's effort to combat climate change. We look forward to continued engagement with ARB and other state partners.

Sincerely,

Jennifer Tendick
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