



December 7th, 2017

Re: Final Proposed 2017 Scoping Plan

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

Thank you for your leadership and commitment to ensuring our state has a strong, coordinated plan in place to achieve our 2030 climate goals. We, the undersigned organizations, know the Scoping Plan will shape our state's future actions so it is important that it provides a clear roadmap for all sectors to reduce greenhouse gas emissions and provide real benefits to all Californians.

The transportation sector is the single largest source of greenhouse gas (GHG) emissions. As stated in our letter on SB 375 targets, the Air Resources Board (ARB) must work collaboratively with other state agencies, regions, and stakeholders to develop land use and transportation strategies to achieve a 25% GHG reduction in the transportation sector to achieve the state's 2030 climate goal and stay on track for the 2050 climate goal.

The 2030 Scoping Plan must include a clear strategy to reduce greenhouse gas (GHG) emissions from the transportation sector, including strategies to address vehicle miles traveled (VMT). To meet the state's ambitious climate goals, ARB must:

1. Establish 7.5 percent reduction in vehicle miles traveled (VMT) by 2030 as a target.

The Air Resources Board (ARB) staff report on SB 375 targets¹ shows that additional reductions in VMT growth 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 30% emission reduction mandate². Numeric targets are key to track progress as well as ensure the state and regions

¹ ARB. (2017). Final Staff Report: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets. https://arb.ca.gov/cc/sb375/final_staff_proposal_sb375_target_update_october_2017.pdf

² ARB. (2016). Mobile Source Strategy. <https://www.arb.ca.gov/planning/sip/2016sip/2016mobsrsrc.pdf>

achieve their goals. We recommend that the 2030 Scoping Plan include the 7.5 percent reduction from VMT as a numeric target to be a clear metric for both the state and regions to meet.

2. Identify additional strategies, beyond the SB 375 targets, that can reduce VMT and help achieve the 25% GHG reduction in the transportation sector.

Right now, modeling limitations are getting in the way of being able to raise the SB 375 regional targets to the level necessary to reach the state's climate goals. We recommend the 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. 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 outlines several key state-level strategies to reduce VMT that should be incorporated into the Scoping Plan.

In addition to the strategies listed in the white paper, we also recommend the Scoping Plan include the following strategies:

- ***Guide investment to rural communities' land use and transportation policies:*** The 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, including unincorporated 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 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 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 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

3. Establish a state agency working group to identify additional strategies, beyond the SCS targets to reduce VMT growth and achieve the 25% GHG reduction target.

To achieve the vision shown in the Vibrant Communities and Landscapes⁴ document -- and implement the additional strategies beyond the SB 375 targets -- we recommend the 2030 Scoping Plan assign the following state agencies with responsibility for key statewide VMT reduction strategies (as related to the agency's mission). The Scoping Plan should also include a clear implementation timeline so these efforts are completed in a timeframe to meet the 2030 target. These state agencies include: Strategic Growth Council, California Department of Transportation (Caltrans), California State Transportation Agency (CalSTA), Air Resources Board (ARB), Department of Housing and Community Development (HCD), and the California Transportation Commission (CTC). The 2030 Scoping Plan should also include a commitment for the state agencies listed above to regularly meet with stakeholders to discuss their efforts to reduce VMT and develop a public action plan similar to the Natural and Working Lands Climate Change Implementation Plan.

4. Coordinate with the California Transportation Commission (CTC) to better align our transportation funding with the state's ambitious climate goals.

To achieve the 2030 climate goal, our transportation planning and investments must be aligned with our GHG reduction targets. With the passage of SB 1, there is now \$5.2 billion a year -- or \$52 billion total -- for transportation projects for the next ten years. Additionally, there are Greenhouse Gas Reduction Fund (GGRF) programs like the Affordable Housing Sustainable Communities Program (AHSC) that advance the creation of sustainable, equitable communities. To ensure expenditures from the transportation package align with our climate goals and leverage GGRF funds from AHSC and other programs to create sustainable, equitable communities, we will need all state agencies to work together. We recommend ARB regularly meet with the CTC to ensure the state's transportation planning and investments align with the strategies and goals listed in the Scoping Plan.

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,

Chanell Fletcher
Director
ClimatePlan

Matthew Baker
Land Use and Conservation Policy Director
Environmental Council of Sacramento

⁴ Strategic Growth Council et al. (2016). Vibrant Communities and Landscapes: A Vision for California 2050. <https://www.arb.ca.gov/cc/scopingplan/meetings/091316/vibrant%20communities.pdf>

Tony Dang
Executive Director
California Walks

Eva Inbar
President
COAST

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

Rev. Earl W. Koteen
Sunflower Alliance

Bryn Lindblad
Associate Director
Climate Resolve

Bill Magavern
Policy Director
Coalition for Clean Air

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

Sopac McCarthy Mulholland
President and CEO
Sequoia Riverland Trust

Mike McCoy
President
Southwest Wetlands Interpretive Association

Yolanda Parks
Environmental Justice Program Manager
Catholic Charities Diocese of Stockton

Howard Penn
Executive Director
Planning and Conservation League

Matt Vander Sluis
Deputy Director
Greenbelt Alliance

Dolores Barajas-Weller
Director
Central Valley Air Quality Coalition

Sophie Wolfram
Policy Advocate
Climate Action Campaign

Denny Zane
Executive Director
Move LA

Joshua Stark
State Policy Director
TransForm

Nikita Daryanani
Policy Coordinator
Leadership Counsel for Justice and Accountability