



**INVESTING
in PLACE**



AIA
Los Angeles



July 28, 2017

California Air Resources Board
1001 I Street
Sacramento, CA

submitted electronically via: <http://www.arb.ca.gov/lispub/comm/bclist.php>

RE: Southern California Support for ARB's Proposed SB 375 Targets & Recommendations for Ensuring Success

Dear ARB board members and staff:

Our organizations are all actively engaged in advancing solutions that will bring about a less carbon-intensive transportation sector in Southern California. We firmly believe that doing so is the only option that protects the health and well-being of the communities we represent, and we submit this letter to you in that spirit -- of advancing much-needed transportation and land-use solutions.

Let us first thank you for the crucial analysis that you have done in the Scoping Plan Update to determine the extent of greenhouse gas reductions that remain to be achieved through changes in transportation behavior and land use patterns. Any discussion of SB 375 targets should be considered in that context, fully aware of the magnitude of what is needed in total, because it is only with that big-picture perspective that the appropriate amount of ambition will be assumed.

The SB 375 target that ARB staff have proposed for the SCAG region (namely, a 21% reduction below 2005 levels by 2035) is an ambitious one, but also an achievable one, provided we all work together toward that goal. We believe the SCAG region can do the following to achieve the maximum GHG reduction:

- **Changes to land use:** In Southern California Association of Government's most recent SCS, 50% of growth still would occur as greenfield development. Despite the great potential for more constrained land use in the plan, SCAG explicitly chose not to analyze land use alternatives at all in their stress test. Even a small change in land use could result in significant GHG reduction for the SCAG region.
- **Additional State Funding:** As noted in the Proposed Update to the SB 375 GHG Emission Reduction report from ARB staff, MPOs now have an influx of state funding from the passage of SB 1, which is the largest increase in transportation funds in state history. With the Volkswagen Settlement and the recent extension of cap and trade, SCAG has a significant amount of funding to help them invest in alternative transportation choices and achieve a more ambitious target.
- **Increase regional investments in public transit and active transportation:** In its target recommendation, SCAG considered spending another \$10 billion on active transportation, with \$5 billion of it coming from the recently-passed Measure M in LA County. However, SCAG did not evaluate the more significant shifts of funding, away from highway expansion and toward improved public transit and active transportation infrastructure, that could be achieved if some of County Transportation Commissions (CTCs) were to re-evaluate long-term spending priorities. Facilitating a process where CTCs align their long-term spending priorities to achieving the goals of SB 375 could also provide additional funding to help the SCAG region achieve its most ambitious target. Shifting investments away from highway expansion will also help us improve the health of the residents of the SCAG region.

In addition to these regional efforts, we urge State agencies to take the following actions (most of which are mentioned in the [Vibrant Communities](#) and [VMT Strategies](#) white papers) **in the near term**, in order to support our region in reaching the proposed 21% reduction target. We further encourage State agencies to **commit to tangible milestones and targets** in the next release of the Scoping Plan Update, as a way to provide clarity and assurance that the following actions will be taken in a timely manner.

1. Support the development of performance measures that track VMT impact and can be used to screen transportation project's alignment with climate goals.
2. Use performance measures mentioned above, to inform State allocations of funds, which should be used to incentivize that local funding allocations also be brought into alignment with climate goals. For example, we should not be building new,

sprawl-inducing freeways, such as the proposed High Desert Corridor freeway in North LA and San Bernardino Counties. Carrots and sticks at the State level could help prevent those sorts of harmful projects from coming into fruition.

3. Implement SB 743 broadly and in an impactful way to further decrease the likelihood that VMT-increasing projects will be financially feasible. It must be applied statewide, to transportation as well as land use projects.
4. Research and develop anti-displacement strategies to support equitable infill development and investments in transit corridors. Not only would this have a substantial, direct greenhouse gas reduction benefit, but it could also improve the political viability of such investments.
5. Integrate equity criteria into all State funding programs to ensure that areas most in need of investments have a fair shot at receiving those funds. Rather than keeping Southern California at a disadvantage for funds because of historical barriers in shifting towards a more sustainable transportation and land use scenario, funds should be aimed at supporting that transition. As it is now, the most advanced jurisdictions have a considerable advantage in winning competitive funds.
6. Support employer-based strategies for Transportation Demand Management (TDM), such as parking cash out schemes, to nudge behavior towards lower-carbon alternatives. Encourage enforcement of the existing law through increased monitoring and tools to help employers adopt subsidies for alternative modes of transportation. Utilize the private sector as an ally, especially in high-quality transit areas.
7. Institute strong road use pricing mechanisms for autonomous vehicles in the near term, before a well-defined user group forms to stand in opposition to such action. If we know this is coming, policies should be crafted already now to bring autonomous vehicles into alignment with climate goals.

With State agency support to ensure that VMT-increasing projects are not funded, and that investments in VMT-reducing measures are made where they are most needed, our region not only stands a chance, it is poised to meet (or exceed) the proposed 21% SB 375 reduction target.

This is a question of willpower and willingness to do what it takes, but it need not be one of ability to do so. Our region has historically under-invested in alternative modes of transportation, but it is time now for an urgent shift in funding priorities. You can count on us, the undersigned organizations, to do our part to promote transportation-efficient development, complete streets, and equitable, transit-oriented communities -- and to call on SCAG to play an important role in facilitating that. Stronger targets are necessary to motivate the SCAG region to shift funding priorities to be in alignment with meeting our state's ambitious climate goals.

We appeal to you, too, though, for your further support in moving this transition forward expediently. We know the numerous benefits to transitioning our communities towards a more multimodal, lower-carbon intensity transportation future -- for the climate, for public health, for economic opportunity, and more. We want that for our communities. A higher SB 375 target will help us get there by setting the bar appropriately high, and your support with State actions is needed, too.

If you have any questions regarding the content of this letter, you are welcome to contact Bryn Lindblad at (213) 634-3790 / blindblad@climateresolve.org.

We thank you for your leadership, and encourage you to take greater strides down that path towards greater climate resilience.

Sincerely,

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