



**To: California Air Resources Board  
California Transportation Commission  
California Department of Housing and Community Development**

*Submitted Comments Regarding "How State Agencies Can Better Align Their Programs and Policies to Achieve Transportation, Housing, Air Quality, and Climate Goals"*

November 4, 2020

California YIMBY wishes to submit the following formal comments as an interested party to the deliberations between CARB, CTC, and HCD.

California YIMBY is a statewide issue advocacy and policy non-profit focused on ending the housing shortage and affordability crisis. Our 80,000 members live in every corner of the state, and are active in supporting reforms that will make California a more affordable, equitable, and sustainable place to live. You may read more about California YIMBY at <https://cayimby.org/>.

Pollution from transportation is the leading source of greenhouse gas emissions in the state of California -- and, due in large part to the housing shortage in our urban job centers, these emissions are on the rise. In 2018, CARB found that [Californians must reduce vehicle miles travelled \(VMT\) by 25% by 2030](#) for the state to meet its ambitious climate policy targets. These findings have been confirmed by subsequent research.

**California could succeed on all other aspects of its climate agenda, but still fail to achieve its overall climate goals due to the housing shortage alone.**

The growing body of evidence confirms that while vehicle electrification is an urgent and critical solution to the challenge of pollution from cars, it is not sufficient. The only way for California to meet its climate policy goals is by reducing VMT through the scaling up of transit-oriented housing, mass transit, and walkable/bikeable communities. In so doing, the state could also address the leading source of [criteria pollutants](#) and [harmful particulate matter](#) in our state: vehicle tailpipe emissions, and brake and tire wear -- both of which have disproportionate, severe, negative health impacts in low-income neighborhoods and communities of color.

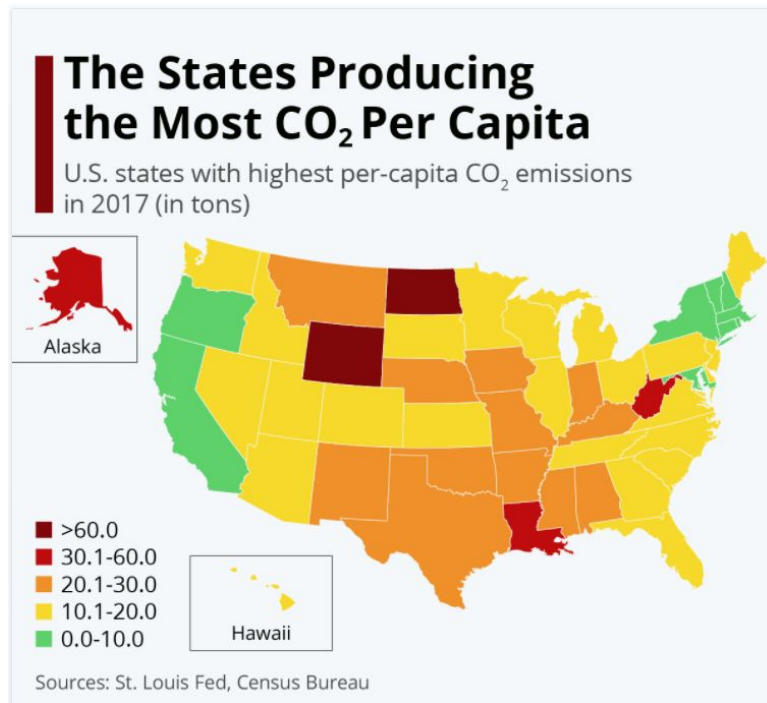
A wide body of literature has established the connection between land use patterns and VMT. Specifically, Jones et al (2018) found that, for most coastal California cities, [infill housing has the greatest VMT/carbon mitigation potential](#) due to the inverse relationship between urban density and VMT.

Additional research from [Energy Innovation, LLC concluded](#):



“Implementation of smart land use policy, in combination with technological advances in the energy sector, will be critical for [California] to achieve its ambitious 2030 decarbonization target.”

In addition to the direct increase in transportation emissions caused by sprawl development, California's high housing costs -- the highest of any state in the U.S. -- are pushing more



middle-income workers out of the state, to states like Arizona, Texas, and Nevada, where per capita carbon emissions are higher. Since the marginal California resident has lower carbon emissions than the marginal resident of virtually every other state, a policy that seeks to reduce housing costs in California will also reduce overall U.S. carbon emissions.

Existing state law should have already changed land use patterns to reduce sprawl and increase affordable, infill housing density, along with the investments in transit and other alternatives to car travel that are the solutions to growing VMT.

For example, under SB 375, the Sustainable Communities Strategy included requirements that cities establish Priority Development Areas for multi-family housing in transit-rich neighborhoods. But the law included no enforcement mechanism, and so cities have consistently failed to comply. California cities routinely use loopholes to avoid addressing their transportation emissions, or mount direct legal challenges to laws requiring transport emissions reductions.

California YIMBY takes the position that the state already has many of the tools it needs to reduce VMT immediately, but that additional law and accompanying enforcement regimes are likely to be necessary to achieve climate mitigation targets. Our intention is to work with the Legislature and state agencies to craft remedies that address the conjoined challenges of the housing shortage, affordability crisis, and growing emissions from VMT.

In order to craft public policy that achieves these goals, a first step is to quantify and properly attribute the problem. CARB outlines a research agenda in its [2018 Progress Report on the Sustainable Communities and Climate Protection Act](#):



- What is the jobs-housing fit: the balance between low-wage jobs and low-cost housing?
- To what degree is housing unaffordability increasing miles driven?
- How extensive is the displacement problem and what have its impacts been, and where are local jurisdictions working to address it?
- What local policies are most effective in minimizing displacement?

To these research questions outlined by CARB, we would add: “To what degree is housing unaffordability driving out-migration to states with higher per capita GHG emissions?”

On the VMT questions, existing data sources on vehicle trips are likely to yield answers, but analyzing them with an eye toward policy formulation is an urgent and, to date, orphaned task. We call on CARB, HCD, and CTC to prioritize addressing these research questions, and offer our services in helping ensure the research agenda reaches policy-makers with relevant, actionable steps.

What we know from recent history is, virtually no jurisdiction in California is building enough housing to prevent displacement, or reduce VMT. Because of the scale of emissions attributed to the transportation sector, and the inertia behind single-family sprawl housing development, California faces the very real possibility that it could succeed on all other aspects of its climate agenda, but fail to achieve its overall climate goals due to the housing shortage alone:

“The state’s housing crisis means that people are living farther from their jobs and commuting farther. And research has found that vehicles at slower speeds produce more carbon dioxide, so rising congestion means rising emissions ... [Besides electrification], the other solution to passenger vehicles is reducing commuting times by solving that housing crisis, and getting people out of their cars by increasing infill and density via building out proper public transportation systems (which themselves will need to be electrified).” [“California Has a Climate Problem, and its Name is Cars”](#)

### **Local VMT calculations must account for commuters**

Lessons learned from the past 15 years of effort around VMT reduction and land use suggest that incentives and even hard targets may be insufficient to prod reluctant jurisdictions to build enough housing to reduce VMT and transportation emissions. We propose that the state consider requiring cities and counties to measure and mitigate emissions attributed to VMT caused by economic activity within their boundaries.

Under the current carbon accounting regime, a city or county can claim dramatic reductions in their transportation carbon emissions even if their jobs-housing fit is causing a net increase in VMT and carbon emissions in other jurisdictions, via worker displacement and commutes. This is because VMT that originate outside of a jurisdiction are attributed to the point of origin, not destination.



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For example, Marin County [imports over 60 percent of its workforce every day](#) from surrounding counties; these workers mostly drive in gasoline vehicles -- 70,000 of them per day -- from Sonoma, Napa, San Francisco, Contra Costa, Alameda, and Solano Counties. According to the [Marin Environmental Housing Collaborative](#), between 2010 and 2016, Marin's economy added 17,000 new jobs, a 15 percent increase. Over the same period, Marin housing stock grew by just 700 units, or less than 1 percent.

But in its [most recent Greenhouse Gas Inventory](#), Marin County claims a 17 percent drop in GHG emissions from the transportation sector in the county. It is clear that Marin's inventory is not capturing the dramatic increase in VMT and carbon emissions caused by its severe jobs-housing imbalance.

We believe that the state has a strong interest in addressing the problem of jurisdictions with severe housing shortages that "export" their transportation carbon emissions and VMT. The state should credit in-commute trips towards a jurisdiction's VMT calculation, but also take into consideration a jurisdiction's efforts to achieve a certain (to be determined) housing affordability level. Even with inclusive land-use policies, jurisdictions with strong central business districts would have a higher jobs/housing ratio than neighboring jurisdictions. The goal should not be to penalize cities for creating jobs, but rather, incentivize them to create workforce housing and rapid, reliable mass and/or carbon-free transit.

Under any scenario, climate action demands that the state include firm, enforceable deadlines for all jurisdictions with regard to VMT reductions, and make clear its intent to intervene with effective remedies in the event of non-attainment.

We appreciate having the opportunity to submit this comment and look forward to working with HCD, CARB, and the CTC to achieve our housing, climate, and clean transportation goals.

Regards,

A handwritten signature in black ink that reads "Brian Hanlon".

**Brian Hanlon**  
President & CEO  
California YIMBY