



Catholic Charities
of the Diocese of Stockton
Help for Today...Hope for Tomorrow



July 28th, 2017

Re: Update to the SB 375 Greenhouse Gas (GHG) Emission Reduction Targets

Dear Chair Nichols, Air Resources Board members, and staff:

Thank you for the opportunity to provide comments on proposed Update to the SB 375 Greenhouse Gas (GHG) Emission Reduction Targets. We, the undersigned organizations, are writing to ask the Air Resources Board (ARB) to ensure that the adopted SB 375 GHG Emission Reduction Targets are as ambitious as possible.

When SB 375 was passed in 2008, it was a groundbreaking first step to link transportation, land use, and housing plans in order to reduce vehicle miles traveled and alleviate the impacts of climate change. Since its passage, California has changed significantly, including more ambitious climate goals. However, transportation continues to be the single largest emitter for greenhouse gas emissions in California.¹ Emissions from passenger vehicles alone jumped 4.4% in 2015.² If we want to achieve our state's ambitious climate goals - and continue California's unprecedented leadership on climate change - we cannot continue with targets that maintain the status quo.

We recognize that the Air Resources Board conducted a fair and independent review of all target-related materials. We applaud staff's decision to pursue higher targets than recommended by the MPOs. As noted in the staff recommendations, the total need as identified by the Scoping Plan is 25% GHG reduction relative to 2005. As noted above, we will all need to do more if we want to achieve our ambitious climate goals. The staff proposed targets would result in 19.9% GHG reduction, almost a 3% increase from the MPO recommended targets.

¹ <http://www.latimes.com/projects/la-pol-sac-california-climate-change/>

² <http://www.latimes.com/projects/la-pol-sac-california-climate-change/>

Given our ambitious climate goals - and the lack of leadership at the federal level - we believe this increase is a step in the right direction.

In order to achieve the maximum GHG emission reduction possible, we urge the board and staff to take into account the following recommendations when adopting the targets:

- Assess MPOs' current transportation spending and identify where MPOs and other local or regional agencies could shift their spending towards alternative transportation options that will help us achieve stronger targets.
- Incorporate land use changes that would protect natural and working lands and are proven to reduce GHG emissions into the targets.
- Incorporate social equity factors into the proposed targets and recommend analyses for MPOs to ensure targets maximize benefits and mitigate harms for low-income and disadvantaged communities.
- Provide greater transparency around the modeling so the public can better understand the impact of the rebound effect.
- Identify the co-benefits, such as improved public health outcomes and better air quality, that we will see from stronger targets.

Assess MPOs' current transportation spending and identify where MPOs could shift their spending towards alternative transportation options that will help us achieve stronger targets.

As noted in the staff report, due to the passage of SB 1 and the Volkswagen settlement, the state now has \$53B³ in new funding over the next ten years for sustainable transportation. We agree with the staff report that these new dollars put us on track to achieve stronger targets. In addition to the influx of new funding, we recommend ARB work with Caltrans, the California Transportation Commission (CTC), and California State Transportation Agency (CalSTA) to conduct an analysis of how MPOs are spending their current transportation dollars. This analysis should also identify where MPOs can further shift their spending towards sustainable transportation choices. We believe this analysis could lead to even greater reductions in greenhouse gas emissions, as well as reduce vehicle miles traveled (VMT). As noted in ClimatePlan's Target Submission letter, re-evaluating existing funding strategies was not identified as a key strategy to reduce greenhouse gas emissions, despite the clear need to reduce VMT as identified in the staff report. While MPOs assert that their funding sources are constrained, we believe this analysis could be beneficial in helping them identify discretionary sources as well as be the catalyst of a larger effort to ensure that our state transportation funds align with our sustainability goals. The 2014 SSTI report stated that "...Caltrans (or for that matter [CalSTA] or the CTC) [is not] a major player in ensuring the regions are moving towards lower VMT development, as envisioned by SB 375, even though much of the work done in the region is funded through state STIP monies."⁴ This analysis could strengthen Caltrans', CalSTA's, and the CTC's role as well as help MPOs evaluate how their current transportation

³ SB 1, Volkswagen settlement, Transformative Communities Climate

⁴ State Smart Transportation Initiative. (2017) The California Department of Transportation: SSTI Assessment and Recommendations. <http://www.dot.ca.gov/CIP/docs/SSTIReport.pdf>

dollars are spent and ensure all discretionary funding increase investments for public transit and active transportation.

Incorporate land use changes that would protect natural and working lands and are proven to reduce GHG emissions into the targets.

Stronger targets encourage regions to invest in existing communities and conserve natural areas and farmland. In response to the draft 2017 Scoping Plan update, a number of conservation partners drafted a letter encouraging ARB to include a clear and quantifiable climate goal for the natural and working lands sector. Based on an initial analysis⁵ - coupled with peer-reviewed data - they believe that natural and working lands could achieve at least 5 million metric tons of reductions in carbon dioxide equivalent (MMTCO₂e) annually by 2030. This number is a conservative estimate. The Sustainable Communities Strategies and Conservation report, shares that "...a growing body of research shows that conservation is essential to achieving GHG reductions."⁶ Land use changes from natural and working lands could help us achieve even greater GHG reductions, and further close the gap identified in the staff report. Regions should look at the opportunity to conserve more lands, which will prevent the highest-VMT development and reduce VMT from existing development because infill shortens trips, while the scoping plan should set a target for additional reductions or avoided emissions, e.g., as oak woodlands and forest floors and soils continue to sequester and retain carbon. As ARB continues to refine the targets, we recommend incorporating land use changes that would protect natural and working lands and are proven to reduce GHG emissions into the targets. We believe the incorporation of these land use changes could lead to stronger, more ambitious targets - and ensure that regions continue to protect our natural and working lands.

Incorporate social equity factors into the proposed targets and recommend analyses for MPOs to ensure targets maximize benefits and mitigate harms for low-income and disadvantaged communities.

Stronger targets should also maximize benefits to low-income and disadvantaged communities and mitigate harm. For us, maximizing benefit means stronger targets provide all Californians with affordable opportunities to drive less and live in safer, healthier communities. And mitigating harm means stronger targets protect the rights of communities of color and low-income communities, who stand to be impacted most by harms such as displacement. One of the recommendations from the Regional Targets Advisory Committee (RTAC) to ARB was to ensure that social equity factors are incorporated into the 2010 GHG target setting - and in subsequent adjustments to the targets, to the extent modeling or "off-modeling" methodologies exist. Social equity factors include, but are not limited to, housing and transportation affordability, displacement/gentrification, and the jobs-housing fit.⁷ Despite this recommendation

⁵ The Nature Conservancy. (2017). Internal Analysis of Emission Reduction Potential from Natural and Working Lands.

⁶ Adam Livingston, The Nature Conservancy. (2016). Sustainable Communities Strategies and Conservation: Results from First Round and Policy Recommendations for Future Rounds."

⁷ Regional Target Advisory Committee (RTAC). 2009. Recommendations of the Regional Target Advisory Committee Pursuant to Senate Bill 375: A Report to the California Air Resources Board. <https://www.arb.ca.gov/cc/sb375/rtac/report/092909/finalreport.pdf>

in 2009, we have not seen how these targets incorporate or address social equity factors. To the extent possible, we recommend ARB work with stakeholders and academic institutions to identify how these targets incorporate social equity and provide maximum benefit, while mitigating harms, to low-income and disadvantaged communities. We also recommend that ARB provide a list of recommended policies and practices to offset any harms. This list should include the social equity analysis identified in Appendix L of the 2017 Regional Transportation Guidelines for MPOs which provides guidance to “...ensure that any planned regional transportation improvements do not have a disproportionately high and adverse impact on low income or minority populations, and to ensure that the plan will not result in the denial of, reduction in, or significant delay in the receipt of benefits by minority or low-income populations.”⁸

Provide greater transparency around the modeling so the public can better understand the impact of the rebound effect.

As noted in our previous letters, we continue to advocate for clear and transparent modeling, in terms of assumptions and all technical matters as related to SB 375 target setting. We have also repeatedly asked that models not function as “black boxes,” where it is not clear how the outputs are calculated and how assumptions like the cost of driving impact the results. After the SB 375 workshops, we remain concerned that the modeling, particularly the impacts of a rebound effect, are not transparent. We recommend ARB facilitate a process with stakeholders and the MPOs to provide greater transparency around the modeling, including the impacts of the rebound effect, so the public can better understand and work with agencies to address this concern.

Discuss the co-benefits, such as improved public health outcomes and better air quality, that we will see from stronger targets

While the focus of SB 375 is the reduction of GHG emissions, we’ve also seen how SB 375 provides a multitude of co-benefits, including improved public health outcomes and better air quality as well as increased access to economic opportunity. Stronger targets are important to continue to reduce emissions as well as further maximize important co-benefits for our communities. In line with maximizing co-benefits, stronger targets can help us to better meet our regional and statewide goals. As noted in a recently-published study, “Health and greenhouse mitigation benefits of ambitious expansion of cycling, walking, and transit in California,” currently the “...increase in walking and cycling of the regional preferred scenarios do not appear to be on trajectory to meet strategic management goals of the California Department of Transportation, which aims to double walking and triple cycling from a 2010 baseline by 2020.”⁹ Stronger targets could help achieve multiple goals, specifically pushing the regions to implement strategies that promote increased levels of walking and bicycling, which will improve our health as well as help the state meet its ambitious goals. These strategies also help reduce emissions from cars and improve air quality. We recommend that ARB discuss the multitude of co-benefits

⁸ California Transportation Commission. (2017). 2017 Regional Transportation Guidelines for MPOs.

⁹ Woodcock, J., Maizlish, N., and Linesch, N.J. (2017). *Journal of Transport & Health*. “Health and greenhouse gas emissions mitigation benefits of ambitious expansion of cycling, walking, and transit in California.” Available at: <http://dx.doi.org/10.1016/j.jth.2017.04.011>.

that will be maximized with stronger targets, and discuss how stronger targets will help put us on track to achieve the ambitious goals outlined in the Caltrans Strategic Management Plan.

We look forward to continuing to partner with you on this effort to reduce emissions - and ensure SB 375 leads to a more sustainable, equitable California.

Sincerely,

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