



June 23, 2022

Liane Randolph, Chair
California Air Resources Board

Submitted electronically via:
www.arb.ca.gov/lispub/comm/bclist.php

**Re: Golden State Gateway Coalition Comments on
California Air Resources Board's Draft 2022 Scoping Plan Update**

Dear Chair Randolph and Members of the Board:

On behalf of Golden State Gateway Coalition, I am writing to express our very serious concerns about the Draft 2022 Scoping Plan Update (the "Update") that is proposed for consideration by the California Air Resources Board ("CARB").

The Golden State Gateway Coalition generally shares the goals of addressing and mitigating greenhouse gas emissions ("GHG") arising from activities in California, and doing so in ways that improve the lives and well-being of all Californians and protect and benefit our economy. In addition, we believe that to achieve AB32/SB375 goals and the best outcomes:

- New and ongoing CARB regulations must be soundly justified and obtainable (technologically, financially, etc.)
- CARB's regulations should be as commanding or as tempered as the proof and data indicate is best; and
- The evolution and ongoing evaluation of CARB's policies and regulations should reflect input from all affected stakeholders, including certainly from the most affected industries.

While the Update is well-intentioned, it contains several elements that should be substantially corrected before the Update is finalized by CARB. Given the mission of the Golden State Gateway Coalition, our comments center around transportation and VMT.

Unfortunately, CARB continues to champion land use policies aimed at radically reducing per capita vehicle miles traveled ("VMT"). Indeed, the Update contains a stated goal of reducing non-commercial, per capita VMT by some thirty percent (30%) between 2019 and 2045. In short, CARB aims not to decrease GHG per se, but instead to decrease individual mobility by nearly one-third, and to do so by mandating sweeping, concentrated changes in our urban form. Additionally, decrease in commercial per capita VMT reductions will impede goods movement furthering the supply chain issues California is currently experiencing.

Since 2010, pursuant to Senate Bill 375 enacted in 2008, CARB has been promoting land use scenarios aimed at reducing per capita VMT; but no meaningful VMT reductions have been realized! The state's VMT initiatives are not working, but they are killing needed homebuilding

A steadfast reliance on VMT cutting means that CARB is driving California's citizens out of state. Jobs are transitioning and are becoming automated or offering work from home. California is investing in transit projects, electrical vehicle charging stations, electrical vehicle fleet upgrades, etc. Prior to VMT action, CARB should assess the lifestyle changes and infrastructure investments required before it enacts VMT mandate. Without the infrastructure investment, lives of hardworking Californians will be harmed.

CARB's Update continues to pursue transportation policies that the data show is being effectively rejected by overwhelming percentages of the relevant public.

Consistent with CARB's wish to greatly reduce individual mobility and VMT, the Update indicates CARB's continuing push to promote (i) mass transit systems and infrastructure, and (ii) mass-transit-oriented real estate development and redevelopment; in each case to the exclusion of all other alternatives (such as new and better roads leading to new towns). Specifically, the Update calls for a doubling of transit service coverage and service frequencies by 2030. (Update, Appendix E, p. 13.) All available data from recent years show, however, that public utilization of mass transit is both relatively minimal and generally slipping further. Indeed, per capita mass transit utilization was trending downward even before the COVID-19 pandemic decreased such utilization even more – as even SCAG has recognized. We therefore question the wisdom of CARB's determination to keep pouring state funding into mass transit infrastructure that California's citizens find to be of little collective utility.

The Update similarly calls for substantial additional spending focus on infrastructure for walking and bicycling, which is connected to CARB's push toward relatively dense urban housing. (Update, Appendix E, pp. 6-11.) But spending on walking and bicycling infrastructure will have no more than a de minimis impact on the other forms of mobility such as individual VMT or mass transit, given that less than 2% of all VMTs involves trip lengths that are short enough to be accomplished by walking or biking. Furthermore, many citizens have infirmities that preclude their ability to use such alternatives.

CARB and all state agencies should be working to provide a balanced mix of new transportation infrastructure—including mass transit where it would have the most utility and paths for walking and biking—that recognizes the need for new roads and lane additions where they would have utility and allow for additional homebuilding of all typologies.

We share CARB's desire to see continued emissions reduction while maintaining the states diverse economic vitality, and we know the task is not easy. We appreciate the staff and board's diligence in bringing diverse groups to the table to map out the most effective CARB Scoping Plan as possible.

Thank you for your consideration of our letter. If you have any questions, please contact John Musella at 310-717-6622.

Sincerely,

JOHN MUSELLA
Executive Director