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June 24, 2022

The Honorable Liane M. Randolph  
Chair, California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

**RE: Comments on CARB Draft 2022 Scoping Plan Update**

Dear Chair Randolph:

On behalf of the Riverside County Transportation Commission (RCTC), I write with comments to the California Air Resources Board (CARB) Draft 2022 Scoping Plan Update (draft update), pursuant to AB 32 (Nunez, Chapter 488, Statutes of 2006). Both in its capacity as the transportation planning agency for Riverside County and as the managing agency of the Western Riverside County Regional Conservation Authority (RCA), RCTC recognizes the state's intention to secure an equitable and climate-resilient future, including for residents in Riverside County.

RCTC commends CARB for its thoughtful approach to incorporating Natural and Working Lands (NWL) into the draft update in pursuit of nature-based solutions to climate change and particularly for further distinguishing landscape types—such as chaparral—and the complex modeling that must inform the appropriate management of those landscape types. However, RCTC has concerns regarding the proposed approach to achieve sustainability in the transportation sector by willing reductions of Vehicle Miles Traveled (VMT) without providing the necessary funding and flexibility for under-resourced, inland regions with lacking multimodal transit systems to provide residents with accessible and reliable alternatives to single-occupancy vehicles.

The RCA administers the state's largest Natural Community Conservation Plan (NCCP) and the nation's largest Habitat Conservation Plan (HCP). Indeed, the Multiple Species Habitat Conservation Plan (MSHCP) protects 146 species with a planned 500,000-acre reserve in the western half of Riverside County. However, RCTC's involvement with the MSHCP did not begin when it assumed managing responsibility of the RCA in January 2021. Our work dates back to the development of the Riverside County Integrated Project (RCIP) over 20 years ago to sustainably plan for housing and transportation infrastructure need, balanced with open space and habitat preservation. Riverside County believes so much in the mission of the RCIP and the MSHCP, that Measure A—RCTC's voter-approved transportation sales tax—conditions that cities in western Riverside County must be permittees of the MSHCP and must adopt a Local Development Mitigation Fee (LDMF) that funds the RCA's land acquisition and habitat management programs.

In addition to RCTC's work in advanced mitigation for transportation projects through the MSHCP, RCTC is proud to be ahead of the state in delivering projects and programs that advance carbon reduction goals, from opening tolled express lanes on State Route (SR) 91 and Interstate (I) 15 that expand opportunities for express

bus service, to developing reliable rideshare programs. RCTC is also responsible for the first expansion of Metrolink commuter rail service to open since 1994, the 91/Perris Valley Line. We continue work on expanding our commuter rail stations to add more ridership capacity with more service frequency, and we are planning daily intercity rail service between Los Angeles and the Coachella Valley.

Despite this progress, Riverside County's mobility system remains decades behind due to severe underinvestment from the state. In our county that spans from the Los Angeles Basin to the Arizona border, we still have communities with dirt roads, areas without surface street arterials that may reconnect communities severed by the highway system, and communities with little or no access to transit.

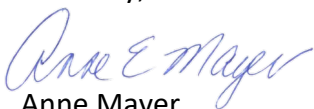
Residents from our most disadvantaged communities, who drive to access their jobs or education, do so not necessarily out of preference, but because meaningful multimodal transit alternatives do not yet exist for them. Disadvantaged communities in Riverside County and other inland regions require a **just transition** to a climate-resilient future. This includes dramatic increases in state investment in our multimodal transit networks, regulatory flexibility to deliver those projects and programs, and the continued ability to provide mobility improvements in the interim for those communities until reliable multimodal transit alternatives are available. Otherwise, those most harmed by climate change would also be socioeconomically stranded – either in traffic or out of the job.

Enclosed for your consideration are RCTC and RCA's comments on the CARB Draft 2022 Scoping Plan Update. Whether it be advancing nature-based solutions for climate change by preventing the irreversible conversion of our region's deep-rooted, carbon sequestering chaparral landscapes, or limiting the climate impacts of the transportation sector, these solutions require unprecedented state investment and regulatory flexibility.

RCTC is a willing partner and has every interest in working with the state to turn the page toward innovative, sustainable transportation solutions that are accessible, equitable, and inclusive. But these inequities look different from community to community and from region to region. We must work together to avoid the worst impacts of climate change.

If you have any questions regarding RCTC's position on this issue, please contact me or Tyler Madary, Legislative Affairs Manager, at (951) 787-7141.

Sincerely,



Anne Mayer  
Executive Director

Enclosure: RCA Comments on the CARB Draft 2022 Scoping Plan Update  
RCTC Comments on the CARB Draft 2022 Scoping Plan Update

CC: Members of the Riverside County State Legislative Delegation

## **RCA Comments on the CARB Draft 2022 Scoping Plan Update**

### Nature-based Solutions in Western Riverside County

RCA applauds the State's efforts to address climate change and build climate resiliency with nature-based solutions. With the help of HCPs and NCCPs, California can accelerate the conservation of critical habitat that will not only bolster the biodiversity of our ecosystems, but naturally sequester carbon. Once the existing plans are fully implemented, they will permanently protect over two million acres, with in-perpetuity management and monitoring. HCPs and NCCPs are critical for regions like ours, which continue to experience dramatic population shifts from Los Angeles and Orange Counties to Riverside and San Bernardino Counties. The inland region is one of the fastest growing, and fastest developing in the state, due to available land.

Our ambitious climate action and conservation goals will not amount to any real-world benefit without dedicated, ongoing funding in the state budget for land acquisition programs, including those administered by the California Department of Fish and Wildlife and the Wildlife Conservation Board (WCB). The largest HCP in the country with the most protected species is located right here in Western Riverside County, and substantial investments from the state are needed to avoid irreversible land conversion from rapid development.

### The Importance of Chaparral Landscapes

In the Draft California 2030 Natural and Working Lands Climate Change Implementation Plan released in January 2019, chaparral was acknowledged in a manner not previously distinguished in state reports, but it was not fully included in planning or goals for the component of the state's plan to reach carbon neutrality by 2030 through valuation of carbon sequestration in natural and working lands. The draft cited "insufficient understanding" of the effect of chaparral on carbon dynamics due to the modeling of the time. As a result, goals thus far were only identified for cultivated lands and rangelands, forested lands, savanna and woodlands, and wetlands and seagrass, omitting the expansive chaparral landscapes of Southern California.

Since the release of the January 2019 Draft Implementation Plan, recent research from University of California, Davis, the United States Forest Service, and San Diego State University has focused on methodology to quantify the storage and sequestration of carbon in chaparral ecosystems. This research should be sufficiently incorporated into the 2022 Scoping Plan Update.

### Actions for the Proposed Scenario in Natural and Working Lands Sectors

Conversion of chaparral and coastal sage scrub to development or to non-native grasslands and weeds through wildfires are all too common. This investment not just in plans like HCPs and NCCPs that promote the sustainable development of regions and manage those lands to conserve the habitat of protected species, but also in management techniques that maximize the carbon sink potential of deep-rooted chaparral is critical to the success CARB's goals for NWL. These actions can build resilience to climate extremes and provide pathways for adaptation, as well as benefits for all communities, particularly those that are under-resourced and historically underserved.

## RCTC Comments on the CARB Draft 2022 Scoping Plan Update

### A Just Transition

RCTC recognizes with the State's intent to secure a climate-resilient and environmentally sustainable future and understands that all sectors have a role to play in the reduction of carbon emissions. RCTC also recognizes that the transportation sector may contribute to carbon reduction goals through widescale adoption of alternative energy and the expansion of multimodal transit networks. However, RCTC's equity concerns come into play when these transitions would cause greater socioeconomic harm to disadvantaged communities in inland, suburban or rural regions than those of coastal urban areas. How we transition matters. Limiting mobility improvements on roads and highways in areas that lack multimodal transit networks without dramatic increases of funding for multimodal transit alternatives would leave disadvantaged communities in Riverside County behind.

Disadvantaged communities in Riverside County and other inland regions require a **just transition** to a climate-resilient future. This includes dramatic increases in state investment in our multimodal transit networks, regulatory flexibility to deliver those projects and programs, and the continued ability to provide mobility improvements in the interim for those communities until reliable multimodal transit alternatives are available. Otherwise, those most harmed by climate change would also be socioeconomically stranded – either in traffic or out of the job.

### Increase Funding and Cut Red Tape to Shorten the Project Pipeline and Limit Future Misalignment

In Appendix E, subtitled, "Sustainable and Equitable Communities," CARB proposes to "adjust the present project pipeline of State transportation investments and reconfigure Caltrans planning processes to reimagine and rescope VMT- and GHG-increasing projects." Before the state considers deprogramming pipeline projects, it should consider the significant local investments that have been made in complete streets through these projects from improved walkability to bicycle access.

The state should further consider how this problem arose – from decades of disinvestment from the state, forcing county transportation commissions to fund needed system improvements with voter-approved sales tax measures. While these measures were designed to encompass the immediate and projected mobility needs of the regions they serve, continued decreases in state investment and exponential increases in regulatory and environmental reviews propagated the unsustainable backlog of projects the state now blames county transportation commissions for planning.

The solution would not be to add yet another layer of review from state agencies such as Caltrans, which is notoriously insular in its development of policies and guidelines. State agencies are disconnected from the communities they attempt to serve, and it shows in proposed policies that do not reflect realities on the ground.

Any perceived misalignment between local projects and state goals may be significantly limited in the future if the state takes action to increase funding and cut red tape. Doing so will restore and preserve the responsiveness of these planned projects to the mobility needs of regions across the state.

## Provide Funding and Flexibility to Sustain the Roles and Responsibilities of MPOs and Local Governments

In Appendix E, CARB proposes that the State place constraints on transportation sales tax measures. MPOs and local governments have been doing the state's job—and doing it well—for decades. Problems arise when the state constantly steps in to move goalposts, without consideration for progress made, nor state funding needed to achieve the new goals. Self-help counties are not the problem. They have been the solution, generating local sales tax revenue to fund and maintain state transportation systems. The State would not be any closer to its climate action goals today if self-help counties did not invest \$6 billion annually over the last 30 years, and neither would Californians' air quality, health, and economic well-being be better positioned if they were forced to sit in traffic from their more affordable homes in inland areas to their jobs in coastal counties.

As a body of local elected officials, RCTC's goal is to ensure the wellbeing and prosperity of Riverside County residents. Separation of powers are enshrined in our constitution, and local governments are respected as the purest, most direct form of representation and constituent response. Despite portrayals of county transportation commissions being unaccountable to the impacts of our transportation systems on the climate, they have in fact been leading in many of the areas the state is now focused on, from integrated planning and advanced mitigation, to implementing rideshare programs and express lane networks that manage congestion and bolster transit alternatives.

## Regional Plans are Making Significant Progress, but Require More Time and Funding before Review for Further Updates

Appendix E also suggests that the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) must be enforced in a manner similar to the Regional Housing Needs Assessment (RHNA). Each year the state directs Metropolitan Planning Organizations (MPOs) to revise and expand their regional planning responsibilities. Not only are MPOs complying, but real progress is also being made toward carbon reduction through regional collaboration. Since its first adoption in 2012, Southern California Associated Governments' (SCAG) RTP/SCS has leveraged voter-approved sales tax measures for further investment in transit and active transportation, resulting in over 760 miles of bike lanes added across the six-county SCAG region. Notably, SCAG credits its plans for twice the amount of greenhouse gas reductions as infrastructure investments. Furthermore, SCAG utilizes the RTP/SCS to identify cities and counties with the greatest job and transit access when drafting the RHNA plan, requiring local planning for 836,857 new housing units where they are most needed in a sustainable manner.

The state is searching for the silver bullet, but progress takes time—and money. What the state can do is produce sustainable, achievable, and financially constrained goals, and MPOs will continue to do the same, as they have done for over 40 years.

## Appendix E Lacks Quantification of Anticipated Reductions

RCTC encourages the State to explore both the financial cost and the quantitative GHG benefits to the strategies proposed in the Scoping Plan before pursuing further administrative, policy or regulatory actions. While we understand that the Scoping Plan is intended as a roadmap rather than a detailed implementation plan, it is difficult to evaluate whether the VMT reduction targets are achievable in the context of the State's climate goals.