



June 24, 2022

VIA EMAIL

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on the Draft 2022 Climate Change Scoping Plan Update

Dear Chair Randolph and Members of the California Air Resources Board (CARB):

Civic Thread congratulates CARB on their efforts to address the complex nature of guiding the State and local jurisdictions toward substantial reductions in greenhouse gas (GHG) emissions and eventual carbon neutrality through the Draft 2022 Scoping Plan Update. It is a challenge to produce a plan that is prescriptive at the state level while being effective at the local and regional level. We feel CARB has successfully addressed the diversity of industries and sectors that contribute to the growing climate crisis. We are particularly glad to see that the Natural and Working Lands sector is represented in the analysis.

Civic Thread (formerly WALKSacramento) is a nonprofit organization with the mission to elevate institutionally underserved voices and priorities to co-create communities, neighborhoods, and places where everyone can thrive. We work at the local and regional scale to promote active transportation, mobility justice, environmental justice, public health, and strong climate action.

We believe that the Scoping Plan is a critical guiding document for regional and local climate action. We provide the following comments in support of improving the Scoping Plan and increasing its efficacy throughout the implementation process. Due to Civic Thread's local and regional focus, we have focused our attention on Appendix D: Local Actions. Our main feedback is that we feel the Scoping Plan does not go far enough in providing guidance to local jurisdictions. We particularly see a need for more specific guidance in Appendix D. With the understanding that the Scoping Plan is a high-level

document and will not contain every detail of implementation, local jurisdictions will be looking to the Scoping Plan for guidance. Unfortunately, while the Plan lays out high-level goals, scenarios, and actions, it lacks clear and actionable guidance on how local jurisdictions can implement those actions and strategies through policy at the local level. Now more than ever, state-level guidance is needed.

Appendix D overemphasizes the Scoping Plan's reliance on local jurisdictions' use of General Plan Guidelines and Climate Action Plans (CAPs) to mitigate cities' GHG emissions. Our recommendations address the missed opportunity for CARB to provide more resources and examples, if not specificity in their guiding policies and incentives which local jurisdictions can then turn to for developing or updating their local planning documents and policies to be in greater alignment with California GHG emission reduction targets.

Please find our recommendations below:

Appendix D - Local Actions

Section 2: The Role of Local Climate Action planning in Supporting State GHG Goals

- **Table 1, p. 5:**
 - **Resources for local governments:** The strategies listed in Table 1 are very general. Local governments may find it helpful to see examples of regulations or ordinances. All local contexts differ and starting with examples shows local leaders which policies may be the most effective in their jurisdictions. Consider creating a reference list with examples of local jurisdictions that have implemented specific policies that respond to some of these strategies. A few examples are provided, but as the Scoping Plan notes, no policy is one-size-fits-all. A list of references may be particularly helpful for local jurisdictions who are deciding which strategies are most feasible in their community, or do not have a CAP but still want to adopt GHG reduction measures without a clear roadmap. This information could be located in a separate informational appendix.
 - **Incentives vs. Policies:** In this Table, incentive programs and policies are lumped together. Policies and incentives are two very different mechanisms that should complement each other and putting them together can imply they are interchangeable. We suggest separating them out and providing more specificity, particularly with examples of what

policies might look like to achieve the GHG reduction goals. For instance, a policy to implement energy efficiency retrofits might look like an ordinance requiring landlords to replace all gas appliances by 20XX, with tenant protections to prevent that cost from being passed to renters. Examples of policy specifics could be included in the separate informational appendix referenced above.

- **Anti-displacement:** While it is noted elsewhere in Appendix D, the importance of employing anti-displacement strategies in concert with GHG reduction strategies is critical. CARB might consider including a note directly before or after Table 1 that anti-displacement strategies and examples can be found in the [Chapple and Loukaitou-Sideris 2021 White Paper](#) (particularly the summary table) that is included in the Scoping Plan reference list. This should also be included in an informational appendix as well as other anti-displacement resources.
- **VMT Reduction:** One of the Strategies under “VMT Reduction” is “Amend zoning or development codes to enable mixed-use, walkable, and compact infill development (such as increasing allowable density of the neighborhood)”. This strategy should also explicitly include affordable housing near transit and transit-oriented development in the list. We recommend including elimination of single-family zoning to the list as well.
- **VMT Reduction:** While infill, mixed-use, and high-density development remain the most viable path toward carbon neutrality, market demands may result in continuing greenfield development. To be responsive to this reality, CARB might consider including a note following Table 1 that amending zoning and development codes can also be helpful in ensuring that new greenfield development is as well-connected and suited to active modes as is possible. Revising street design standards to provide better infrastructure for active modes can still benefit suburban communities. For example, a street design standard for a residential street that prioritizes active modes might look like a narrow vehicle travel lane (10’), a 5’ Class II bike lane, and a 6’ sidewalk, and this could be employed in any community. By acknowledging that few local jurisdictions will find it politically feasible to prevent all sprawl development, CARB can encourage cities and counties to mitigate the harms of sprawl as much as possible, lay the groundwork for active transportation infrastructure, and reduce VMT where possible.

- **VMT Reduction:** Further clarity around reductions to VMT and in alignment with the recommendation of complete streets is to call on local jurisdictions to eliminate all future road expansion projects (with an exception to legacy road expansion projects already approved) unless the road expansion is for the sole accommodation of alternative modes such as widening or improving sidewalks and bike lanes or for accommodating the prioritization of transit.
- **VMT Reduction:** The Scoping Plan places too much emphasis on the conversion to and utilization of ZEV's to reduce emissions. [E-bikes have been shown to play a significant role in replacing local car trips](#), further reducing the impact that over-utilization of private vehicles have on our land-use patterns and subsequent consequences. Local jurisdictions should encourage and advise on how to better incentivize and market e-bikes to their communities through incentive programs for individual purchase, e-bike libraries, or as mentioned in Appendix D, e-bike share programs.
- **VMT Reduction:** Amendments to development codes should include specificity around recommendations to eliminate minimum vehicle parking in denser communities and increase required bike parking to a minimum of 1.25 spaces per dwelling unit in urban and central land-use settings. Codes should further specify that long-term bike storage facilities are required to accommodate diverse bicycle types including e-bikes. Incentives for developers to capitalize on these and other land use improvements should be encouraged or improved where incentives exist but remain underutilized.
- **VMT Reduction:** Absent from the Scoping Plan is any acknowledgment of urban growth boundaries (UGB's). We recommend CARB to encourage regional collaboration for UGB's. By implementing UGB's on a regional scale, sprawl is reduced along with the negative GHG emission impacts to which sprawl contributes.
- **VMT Reduction:** While we commend CARB for acknowledging that parking pricing and other TDM pricing strategies should be implemented, as we have noted elsewhere, the Scoping Plan falls short of suggesting any TDM practices that are currently being implemented. Significant consideration of the effects TDM programs can have on low-income and institutionally underserved communities should be given. Programs should include

measures to offset the financial burdens in a way that is financially feasible and equitable for all drivers such as examples found in [“Five Steps Toward Equitable and Inclusive TDM.”](#)

- **Transportation Electrification:** The Priority Strategies under Transportation Electrification limit the recommendation for conversion to ZEVs to “local government fleets”. According to the ARB’s GHG Inventory Trends report for 2000 to 2019, transportation represented 39.7% of all emissions with passenger vehicles accounting for 73% of that total. We highly encourage the recommendation to expand the conversion of ZEVs to all passenger vehicles to more proportionately address the contribution vehicles pose to the growing climate crisis.

Section 3.1 – Equity and Other Social and Environmental Considerations are Key Elements in Addressing the Climate Crisis

- The Plan notes that of the more than 2.5 million homes needed over the next eight years, no less than 1 million should accommodate low-income households. The Scoping Plan should provide guiding policies cities can adopt to ensure these homes are in transportation efficient areas and are financially feasible for developers to construct.
- Concerning the growing equity crises as it pertains to disproportionate deaths or serious injuries for people of color and active transportation users, consider a statewide policy for cities to document the number of crashes resulting in someone being killed or seriously injured (KSI) and implement restrictions on funding for the following year that a certain percent must be used to address the safety of active transportation road users. Cities that achieve reductions in KSI, will either be eligible for additional funding or should not have the suggested restriction imposed.

Finally, with regards to the Scoping Plan process, we note that it is largely unclear what evaluation of this Scoping Plan will look like once implementation is underway. Though AB 32 calls for updates to the Scoping Plan at least once every five years, what does ongoing evaluation look like? How will CARB identify which Scoping Plan Measures have contributed to substantive change through the simultaneous policy decisions of state, regional, and local jurisdictions? What will accountability look like for local and regional governments? How will the state’s success at meeting its climate goals be evaluated? With the understanding that the Scoping Plan is a policy document, not an

implementation plan, it is still important to ensure that a robust evaluation process is not just in place, but also clearly communicated to the public in the Scoping Plan.

We thank you for the opportunity to review and provide comments on the Draft 2022 Scoping Plan Update. Should you have any questions about these comments, please contact Kiara Reed at kreed@civicthread.org. Civic Thread looks forward to following the implementation of the Scoping Plan. The importance of these guiding policies cannot be overstated at the current moment. California is a critical leader in climate action and the policies the State puts forth will set the tone for regional and local action for years to come.

Sincerely,

A handwritten signature in black ink, appearing to read "Kiara Reed", written in a cursive style.

Kiara Reed
Executive Director
Civic Thread