



June 24, 2022

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

Subject: Draft 2022 Climate Change Scoping Plan

Dear Chair Randolph:

On behalf of the Southern California Association of Governments (SCAG), we want to thank you for the opportunity to comment on the Draft 2022 Climate Change Scoping Plan. The Scoping Plan further demonstrates our state’s role as a global climate policy leader. This document builds on the efforts and progress of not only CARB’s last Scoping Plan but many related efforts and actions of other state, regional and local agencies over the past five years. The purpose of this letter is to highlight and champion the identified actions that we think will be the most effective areas for state guidance and leadership. However, we’ll also point to some areas which don’t align with our understanding of the most effective ways to meet the state’s climate goals, given our experience and expertise in transportation planning. We offer these comments as constructive feedback to ensure that the state can sustain its efficacy and leadership in climate policy.

For SCAG, this year marks the tenth anniversary of our first adopted Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Since 2012, the SCAG region has shifted more transportation funding towards maintenance and alternative modes and away from capacity increasing projects. Specifically, the region has added more than 760 miles of bike lanes and removed major capacity expansion projects from the RTP/SCS like the SR-710 extension and the High Desert Corridor. Since Senate Bill 375 passed in 2008, nearly 60 percent of new household growth has occurred in high quality transit areas. Our most recent Regional Housing Needs Assessment (RHNA) process further codified our commitment to aligning transportation and housing production. Lastly, the use of electric vehicles in the SCAG region has grown from just 2,600 vehicles in 2012 to 150,000 in 2022. However, despite each of our RTP/SCSs meeting our prescribed greenhouse gas (GHG) emission reduction targets, we acknowledge the findings of the Senate Bill 150 (SB 150) report showing that MPOs across the state are falling short in meeting planned VMT and GHG reductions. Therefore, given the ambitious VMT reduction goals stated in the Scoping Plan, the state needs to demonstrate similar rigor to SCSs to ensure that the planned actions are both effective and feasible.

Based on our experience over the last decade in researching, modeling and planning for strategies that reduce GHGs, primarily through VMT reduction, we recognize several proposed actions in the Scoping Plan that have the potential to reduce VMT. Of the “Vehicle Miles Traveled: Strategies for Achieving

SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
www.scag.ca.gov

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Success” identified on p. 156 of the Scoping Plan, many of these align with the goals, investments and programs in SCAG’s RTP/SCS, including: implementing equitable pricing strategies, improving transit service, expanding high-quality active transportation infrastructure, integrated land use planning, and accelerating infill development. SCAG has been engaging with other state agencies to express our concern about implementation of the strategy to reimagine roadway projects from the project pipeline that increase VMT without larger consideration of the role these investments play in the performance of the transportation system and region’s economy. On this point, it is important to highlight that these types of projects are currently accounted for in our SCS both directly and through induced demand analysis and so it is known that highway projects accounts for a minor, less than 1% of impact to our GHG emissions reduction achievement. We think that there are other more effective and impactful strategies on which to focus state resources and attention, while continuing to allow the regional planning process to serve as a forum for balancing multiple plan goals.

We appreciate that “Appendix E: Sustainable and Equitable Communities” of the Scoping Plan outlines more specific actions that the state should immediately lead to reach the stated objectives. SCAG recognizes the most promising actions are those that remove barriers to implementing our SCS either through enabling authority or by providing additional resources, particularly:

- “Permit implementation of a suite of roadway pricing strategies by 2025 in support of adopted Sustainable Communities Strategies.”
- “Permit conversion of general-purpose lanes to transit-only lanes or toll lanes, and full facility tolling.”
- “Commit more state funding for existing and new programs supporting predevelopment work and infrastructure improvements that accelerate climate smart and equitable infill development.”
- “Further ease local regulatory and California Environmental Quality Act (CEQA) barriers to increasing density and streamlining affordable housing development, especially in transportation-efficient areas, and establish protections in law against obstruction tactics to prevent developments that advance state equity and climate goals, including preemption of voter initiatives.”

However, other actions identified in “Appendix E” pose the risk of adding complexity and administrative burden to the transportation planning and funding process without a clearly demonstrated benefit of GHG emissions reductions, such as:

- “Adjust the present project pipeline of state transportation investments and reconfigure Caltrans planning processes to reimagine and rescope VMT- and GHG-increasing projects.”
 - When SCAG prepares the RTP/SCS, we balance mobility, safety, economic, environmental and equity goals alongside our GHG reduction targets. While infrastructure planning and investment decisions will continue to be a significant element of the RTP/SCS, SCAG sees almost double the GHG emission reduction benefits from the plan’s policies and programs as it does from infrastructure investments. This highlights the importance of focusing on wraparound programs to support investments, especially those that are addressing key economic or safety challenges in the region.
- “Establish climate and equity criteria for future locally funded transportation sales tax measures and lower the voter approval threshold for sales-tax measures that only fund transit and active transportation solutions.”
 - Local sales-tax measures are often the result of compromise across differing stakeholder groups. These measures include a mix of roadway improvement or

maintenance investments alongside investments in transit and active transportation. Establishing top-down priorities for local measures could threaten the political viability of this necessary funding source. In SCAG's 2020 RTP/SCS, local sources are an essential component of transportation funding and made up 60% of the Core Revenues for the plan, nearly \$300 Billion dollars.

- “Establish a requirement to demonstrate that addressing transit bottlenecks and other transit efficiency investments are a priority in local jurisdiction and transit agency investment plans as a requisite for overall transportation project funding eligibility.”
 - General plan circulation elements currently require planning for a balanced, multimodal transportation system including consideration of the relationship between users of streets, including transit. This action could have the unintended consequence of withholding needed transportation funding from small jurisdictions that have limited capability to address transit bottlenecks. As we continue to support transit agency recovery from the pandemic, it could be more productive to direct this action to competitive funding programs instead of as blanket requirements.
- “Establish a requirement that all local general plans demonstrate consistency with the assumptions and growth allocations in regional RTP/SCSs at least every 8 years consistent with existing RHNA and housing element update timelines”
 - State housing law requires that the RHNA be consistent with the development pattern of the SCS effectively linking local general plans, through required housing element updates, with the regional growth vision. Additional requirements are unnecessary and would only serve to further complicate and constrain the regional planning process. In Southern California, as the result of the 6th Cycle Regional Housing Needs Allocation plan, cities and counties with the greatest job and transit access, as determined by SCAG's RTP/SCS, are now required to plan for 836,857 units in addition to those units required to address projected growth. This is nearly as much housing as the whole region produced in the last twenty years. Achieving this sustainable and equitable land-use vision ultimately depends on the private sector to produce housing where the cities are planning for it, which demands a significant public investment in the infrastructure needed to accommodate growth. Instead of an additional requirement, jurisdictions in the SCAG region need more tools to help with housing element updates, and for tools beyond planning to fund affordable housing and supportive infrastructure.

More broadly, without more detailed analysis, it is unclear whether the actions identified in the Scoping Plan are sufficient to meet the identified objectives. We would appreciate it if “Appendix E” could provide further detail on the quantification or relative reductions anticipated from each strategy as well as details on agency responsibility and timelines. To conclude, we offer three overarching comments:

The Scoping Plan needs to explore recent trends and leverage the role of technology and innovation: Beyond the actions identified in “Appendix E”, the Scoping Plan is silent on other potential solutions to enable GHG emission reductions from technology. There is perhaps no clearer linkage between transportation infrastructure, technology, and GHG reduction than in broadband deployment. Dig once/dig smart investments in broadband are critical not only to prepare us for an increasingly connected future, but also to ensure that all Californians benefit from new technologies that improve digital access to education, health care and employment, while reducing the need for travel. A recent SCAG-led study concluded that increasing access to and adoption of high-speed internet service (broadband) has the

potential to reduce VMT and GHGs by up to 15 percent when people use it to telework and access remote services. Leadership from the State in researching these and other solutions could accelerate the achievement of our regional targets and mitigate against exogenous factors that influence VMT.

Additionally, trends such as e-commerce and related warehouse siting will impact the statewide transportation system and travel patterns in ways that are not yet fully known. The SCAG region has experienced 20 percent growth in warehousing facilities since 2014. This far exceeds our regional projections. The overall growth in goods movement has caused significant challenges across the supply chain and transportation networks. We appreciate that the Scoping Plan preferred scenario accounted for an increase in both heavy and medium duty trucking VMT, but this underscores the need to address these challenges at least in part through capacity improvements to the roadway network, especially to alleviate health and safety issues. Further discussion and analysis of these trends and the potential solutions will provide a more robust assessment of the challenges and opportunities to reach carbon neutrality by 2045.

The Scoping Plan's VMT reduction targets are unsupported:

As evidenced in CARB's SB 150 report, achieving VMT reductions in California is difficult. Despite the progress mentioned above and the substantial shifts in planning and investments in the 10 years since SCAG's first SCS, travel behavior is not shifting as expected. Therefore, it is concerning that the Scoping Plan relies on many of the same or similar strategies included in the SCS without sufficient analysis to support how the additional actions will lead to the travel behavior change needed to reduce VMT and GHG. While we understand that the Scoping Plan identifies a roadmap and not a detailed implementation plan, without more detailed quantification it is difficult to know whether or not the actions identified in the Scoping Plan will be sufficient to reach the VMT and GHG reduction targets necessary to reach the state's climate goals.

The Scoping Plan does not effectively explore the cost and tradeoffs with other goals:

When SCAG prepares the RTP/SCS, we have a financially constrained plan that balances our multiple economic, mobility, community and environmental goals alongside our GHG reduction targets. There is no price tag associated with any of the proposed actions in the Scoping Plan and therefore upon further exploration some of the identified strategies may prove to be exorbitantly cost prohibitive especially when compared to their intended efficacy. In providing clarification and assessment of proposed pathways that necessitate future policies and regulations, policies should be measured not just for their cost-effectiveness and technological feasibility but also for their administrative burden and efficiency for state, regional, and local governments. This should include a discussion on the impact of current state policies. For example, the short timeframes for housing element updates in Southern California make it challenging to allocate housing that best aligns with sustainability goals thoughtfully. A better understanding of proposed strategies and the impacts of current state policy would be beneficial to the development of the Scoping Plan.

SCAG is committed to our role in achieving the state's climate goals, through GHG reductions from light-duty vehicles. SCAG's longstanding Sustainable Communities Program directs resources and planning support to local jurisdictions to align with the goals in strategies in the SCS. Recent resources from the state, such as Senate Bill 1 Planning Grants and the Regional Early Action Planning Grants have enabled us to accelerate implementation of our SCS. We look forward to continued partnership with CARB and other state agencies. We encourage the state to commit to exploring 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. If you have any questions or require additional information

on any of the ideas discussed above, please contact Sarah Dominguez, Connect SoCal Development Program Manager, at dominguezs@scag.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Jepson", with a long horizontal flourish extending to the right.

Sarah Jepson
Director, Planning and Programs