



January 27, 2017

Clerk of the Board
 California Air Resources Board
 1001 I Street
 Sacramento, California 95814

Re: Public Comment on the 2017 Climate Change Scoping Plan Update: the Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and Draft Environmental Analysis

Dear ARB Board Members and Staff:

The Quality of Life coalition includes environmental, labor, environmental justice, community-based and social justice organizations. Our collective vision is to invest public dollars in a social and environmentally equitable manner to build a vibrant, inclusive economy that lifts up families, creates healthier communities and addresses climate change. One of our core focus areas is transportation in San Diego, particularly advocating for an effective, equitable mass transit system that reduces climate pollution, creates high-quality jobs and provides safe, healthy, affordable transportation alternatives in all communities, particularly our most disadvantaged.

As the California Air Resources Board (CARB) works to finalize the 2030 Target Scoping Plan, we urge you to adopt stringent, science-based targets that will aggressively reduce greenhouse gas emissions in the transportation sector. We agree with your assessment that, “despite

California’s marked progress, greater innovation and effort is needed to avoid the worst consequences of climate change.” The transportation sector represents a substantial opportunity to reduce climate pollution through strategies that reduce vehicle miles traveled (VMT), including considerable investments in mass transit construction, operations, upgrade, and maintenance; transit-oriented development; complete streets, traffic circles, and other traffic-calming measures; safe and accessible biking and walking facilities; improving the way we pay for the use of roads and car parking; and equitable transit operations and fare structures that provide people of all ages and income with access to transportation. CARB’s 2030 Targets must set a high bar to rapidly advance the useful types of transportation changes on the ground at the local and regional level – old school, “business as usual” transportation planning is not an option. The pace, scale and intensity of the climate crisis requires nothing less than bold action.

Additionally, we support the following policy actions:

- Promote higher SB 375 Targets that align with SB 32 and provide direct benefits to disadvantaged communities.
- Provide statewide VMT reduction assumptions embedded in the Scoping Plan to achieve the 2030 GHG reduction target and recommend key strategies and milestones to reduce vehicle dependence in all communities, including the following:
 - Include strong Implementation of SB 743 to make sure each region's transportation projects reduce VMT.
 - Ensure all “transit oriented development” projects are affordable to maximize VMT reductions.
 - Address how investment in rural communities’ land use and transportation policies will help us meet our goals.
 - Include performance targets for transit ridership similar to the performance targets for pedestrian and bicycle trips.
- Ensure all cities of a certain size develop binding Climate Action Plans with measurable social equity and job quality provisions that create tangible benefits for disadvantaged communities and local workers by reducing pollution and creating middle-class jobs.

Finally, the dual challenges of disastrous climate change and rising income inequality are hitting working families and vulnerable communities the hardest. We urge CARB to advance solutions that address these interrelated challenges in crafting the 2030 Targets. Environmental justice, equity and economic opportunity must be front-and-center in developing the 2030 Target Scoping Plan, especially engaging and partnering with environmental justice communities and creating pathways into good, middle-class careers for California workers.

We are grateful for this opportunity to comment and look forward to continued collaboration as this process unfolds.

Sincerely,

International Brotherhood of Electrical Workers Local 569
Climate Action Campaign
San Diego-Imperial Counties Labor Council, AFL-CIO
Sierra Club, San Diego Chapter
American Federation of Teachers, Local 1931
Plumbers and Pipefitters Local 230
San Diego 350
Save Our Countryside, Save our Cities
Center on Policy Initiatives
Surfrider Foundation, San Diego Chapter
Coastal Environmental Rights Foundation
Environmental Caucus, San Diego-Imperial Counties Labor Council, AFL-CIO
ECO Center San Diego
Environmental Health Coalition
League of Conservation Voters, San Diego
Bike Coalition, San Diego County
Mid-City Community Advocacy Network
Bike San Diego
Community Budget Alliance
Escondido Chamber of Citizens
National Nurses United-California Nurses Association
UPTE-CWA 9119, UCSD, Local 9
Community Budget Alliance
Partnership for the Advancement of New Americans
San Diego Coastkeeper
Preserve Calavera
Cleveland National Forest Foundation