



October 31, 2013

Mary Nichols, Chairperson
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Transportation Coalition Comments on AB 32 Scoping Plan Update

Dear Chairperson Nichols:

The Transportation Coalition for Livable Communities is a diverse coalition of agencies and institutions responsible for operating, maintaining, and advancing a sustainable transportation system in California. Our primary interest in this Scoping Plan Update is to ensure that transportation-related strategies contribute to significant and long-term greenhouse gas emission reductions. Building off key elements of the 2008 Scoping Plan, ***we strongly recommend that the Board consider the use of cap and trade revenues for transportation projects and programs that are coordinated with land use policies in order to achieve regional greenhouse gas emission reduction targets and to meet the state's 2030 and 2050 goals.***

Transportation is a key emitter of greenhouse gases, but no single strategy in this sector will achieve AB 32 goals. To reach the long-term goals of this Scoping Plan Update, the state will need to partner with local and regional governments—its “critical partners”—to implement projects that improve the efficiency and connectivity of transportation systems. In addition, infrastructure investments will need to be made to support projects that coordinate transportation and land use policies. The best research indicates that investments in transportation infrastructure lead to greater emission reductions when coordinated with surrounding land use policies and services.

Our recommendation for the Scoping Plan is that ARB consider and prioritize funding for transportation related projects based on cost effectiveness and coordination with land use policies. SB 375 has already created this framework. Regional agencies have developed Sustainable Communities Strategies to leverage coordinated transportation and land use strategies to meet long-term GHG reduction targets. Thus, prioritizing auction revenues in regional strategies that link land use to improved transportation infrastructure will generate the long-term GHG reductions critical to meeting the Scoping Plan goals.

By linking costs likely to be imposed on the motoring public to improvements in the transportation system, our proposal also aligns with broad public sentiment: the Public Policy Institute of California's July 2013 annual survey on the environment reports that over 70% of voters favor spending cap and trade revenues on public transit, repaving roads, and encouraging local governments to change land use and transportation planning so that people could drive less.

We urge you to consider these important factors in the final update to the Scoping Plan:

- *SB 375 has the potential to make significant contributions to the 2030 and 2050 AB 32 Scoping Plan Update goals if it's implemented to its full potential.*
- *The critical component lacking is a funding mechanism tied to SB 375 to ensure that we get beyond plans to full implementation. Cap and trade revenue could be a key source of funds for this purpose and to create a transportation system with a significantly lower carbon footprint than the current one.*
- *A key factor in achieving SB 375 potential is integration of land use and transportation infrastructure under a performance-based approach. While the Scoping Plan highlights specific references to affordable transit-oriented development (TOD), selecting all projects, including TOD and transportation improvements, based on GHG performance will encourage*



changes to overall land use patterns that result in significantly greater GHG emissions reductions.

- *The Transportation Coalition for Livable Communities has put forward a plan for spending a portion of cap and trade revenue that would incentivize improved land use and a more efficient transportation system while achieving the most cost-effective GHG emission reductions.*
- *We urge you to focus on implementing and building upon the framework of SB 375 Sustainable Community Strategies as part of achieving the Scoping Plan's 2030 and 2050 goals.*

This approach is supported by members of the Transportation Coalition for Livable Communities, which includes the California Transit Association; California Alliance for Jobs; Natural Resources Defense Council; League of California Cities; California State Association of Counties; CALCOG, as well as California's major Metropolitan Planning Organizations including SACOG, MTC, SCAG and SANDAG; San Joaquin Valley Policy Council; Sacramento Metropolitan Air Quality Management District; Environmental Defense Fund; Transportation California; California Chapter of the American Planning Association; American Lung Association in California; California Center for Sustainable Energy; and a growing list of over 50 environmental, business, and government organizations statewide.

Our unifying principle is that auction revenues derived from vehicle fuels should be used to fund emission reductions from the transportation sector. This should include integrated transportation investments that implement the AB 32 regulatory program and build on the framework of SB 375 and other GHG reduction strategies. The approach incentivizes combinations of transportation investments, including transit service and operating costs, road and bridge maintenance, retrofits for complete streets and urban greening, and clean technology infrastructure – all integrated with land use changes to achieve the maximum greenhouse gas emission reductions from the transportation sector.

An integrated strategy most equitably and effectively meets the transportation and greenhouse gas emission reduction goals of the state and local communities. Furthermore, this approach achieves the most cost-effective results and supports a range of community benefits including public health, resource protection, affordable housing, equity, air quality, safe routes to schools, and other community services.

In this Scoping Plan Update, we strongly support your consideration of cap and trade revenues as a key greenhouse gas emission reduction strategy for the transportation sector. Implementing strategies that integrate transportation and land use investments will be key in both meeting the state's 2050 goals and creating efficient and well-maintained transportation networks statewide. We urge you to consider the Transportation Coalition's proposal (attached) that was developed for the Investment Plan as part of your update to the Scoping Plan.

Sincerely,

TRANSPORTATION COALITION FOR LIVABLE COMMUNITIES

STEERING COMMITTEE MEMBERS

- *California Alliance for Jobs*
- *California Transit Association*
- *California State Association of Counties*
- *League of California Cities*
- *California Association of Councils of Governments*
- *Natural Resources Defense Council*



COALITION SUPPORT LIST

- Sacramento Area Council of Governments
- Southern California Association of Governments
- Metropolitan Transportation Commission
- San Diego Association of Governments
- San Joaquin Valley Regional Policy Council
- Sacramento Metropolitan Air Quality Management District
- Environmental Defense Fund
- Transportation California
- Self-Help Counties Coalition
- American Lung Association in California
- American Planning Association - California Chapter
- American Council of Engineering Companies of California
- Alameda County Transportation Commission
- Association of Monterey Bay Area Governments
- Bay Area Council
- California Center for Sustainable Energy
- California Urban Forests Council
- Capitol Corridor Joint Powers Authority
- Central Coast Coalition
- City of Davis
- City of Sacramento
- Cobblestone Placemaking
- Council of San Benito County Governments
- County of Marin
- County of Monterey
- County of Napa
- County of Sacramento
- County of San Bernardino
- County of Santa Clara
- County of Stanislaus
- El Dorado County Transportation Commission
- Humboldt County Association of Governments
- Kern Council of Governments
- Livermore Amador Valley Transit Authority
- Local Government Commission
- Madera County Transportation Commission
- Marlon Boarnet, Director of Graduate Programs in Planning and Development, USC

- Merced County Association of Governments
- Met Sacramento High School
- Napa County Transportation and Planning Agency
- Napa Valley Transportation Authority
- OmniTrans - San Bernardino Valley
- Placer County Transportation Planning Agency
- Sonoma County Transportation Authority/Regional Climate Protection Authority
- Richmond SPOKES
- Sacramento 350
- Sacramento Tree Foundation
- San Francisco Bay Area Rapid Transit District
- San Francisco Municipal Transportation Authority
- San Luis Obispo Council of Governments
- San Mateo County Transit District
- Santa Barbara County Association of Governments
- Santa Clara Valley Transportation Authority
- Santa Cruz County Regional Transportation Commission
- Santa Cruz Metropolitan Transit District
- Santa Monica Big Blue Bus
- Shasta Regional Transportation Agency
- Sonoma County Bicycle Coalition
- Sustainable Napa County
- Teichert
- Transportation Agency for Monterey County
- United Contractors
- Urban Counties Caucus
- Victor Valley Transit Authority
- WALKSacramento
- Western Riverside Council of Governments

ELECTED OFFICIALS SUPPORT

- Steve Cohn, Councilmember, City of Sacramento
- Don Saylor, Supervisor, County of Yolo
- Joe Krovoza, Mayor, City of Davis