September 28, 2016

Chair Mary Nichols and Members of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: 2030 Target Scoping Plan Update, Transportation Sector

Dear Chair Nichols and Members of the Board

On behalf of the undersigned organizations, thank you for your leadership and commitment to ensure that California meets the ambitious goals of SB 32. We greatly appreciate the work that has occurred on the 2030 Scoping Plan, and the inclusive public process. We've seen a number of workshops across the state that collected input from a diverse group of stakeholders including public health, equity, environmental, affordable housing, and environmental justice communities. We congratulate and thank the Air Resources Board for ensuring that this process remains transparent and open to all stakeholders.

Now, as we review these documents: "Vibrant Communities and Landscapes: A Vision for California in 2050" and "Potential State-Level Strategies to Advance Sustainable, Equitable Communities and Reduce Vehicle Miles of Travel (VMT), we want to first share our support for the visionary new direction for transportation and land use. Specifically, we are supportive of the actions to:

1. Develop enforceable comprehensive performance targets
2. Update regional greenhouse gas (GHG) reduction targets to achieve adopted 2030 and 2050 GHG reduction standards
3. Support implementation of transportation policies that reduce vehicles miles traveled (VMT) and promote infill development
4. Develop financing, regulatory, and other tools to promote land protection

However, we remain concerned that a number of important land use issues such as affordable housing are missing from these visionary documents. In addition, we are concerned about the lack of alignment between our robust planning efforts to meet our climate goals versus our investments in transportation and land use. With these concerns, we ask you to take action on the following issues for future drafts of the Scoping Plan:

1. Better align <u>all</u> transportation funding with our ambitious climate goals
2. Clarify how the Scoping Plan will address the requisite connection between transportation and transit-oriented development that includes affordable housing and avoids displacement of low-income Californians
3. Incorporate natural resources and working lands conservation strategies to optimize GHG reductions and achieve other public benefits
4. Enhance mobility, equity, and sustainability through emerging technology and shared mobility options such as bike share, car share, ride share
5. Direct significant investment in rural communities now to ensure these communities can significantly contribute to meeting California's GHG reduction goals, while supporting local economies and agriculture, natural resources, and promoting healthy, active and affordable living
6. Better integrate production of public health co-benefits along with elimination of health disparity detriments in the scoping plan and related documents.
7. Strengthen active transportation and public transportation strategies and call for greater investments to maximize mode share shift in these modes
8. Ensure the Scoping Plan continues to promote SB 375 higher targets and include other strategies to help our regions ensure we meet our climate and equity goals
9. Identify the Impacts of Freight Investments on Health Outcomes in Disadvantaged Communities

- **Better align <u>all</u> transportation funding with our ambitious climate goals**

While this conversation occurs here, and relates the various plans, a transportation funding special session is determining actual funding for projects that will be built over the next decade and influence patterns and behaviors through the Scoping Plan time horizon and beyond, is taking place in the Capitol. These two processes must strongly influence each other. The Scoping Plan should outline clear policy steps to connect the various good -- and improving -- plans with the billions of transportation dollars collected each year, and the proposals for generating additional 7+ billion dollars. These investments will determine our infrastructure for the next 100 years -- and will have either a tremendous positive or negative impact on our GHG emissions, local air pollution (and also safety, quality of life, opportunity, etc.). Transportation investments cannot continue to be made primarily in roads designed for auto travel, we must invest significant future transportation funds in sustainable alternatives - transit, bicycling, and walking. This should apply to both state and federal funds that flow to California, as well as locally controlled transportation dollars such as State Transportation Improvement Program funds and local measure funds. Additionally, we must ensure that mobility, access, health, jobs and affordability benefits from these investments accrue primarily to our most disadvantaged communities and households who have been most negatively impacted by past transportation investments. In the realm of transportation, this means ensuring effective public transportation, and in particular bus service and operations, as well as active transportation.

- **Clarify how the Scoping Plan will address the requisite connection between transportation and affordable housing**

Given the growing body of research and public awareness of the benefits of building and preserving affordable homes near transit, it is incomprehensible that the State's strategies and vision documents are virtually silent on this issue. As noted in the California Housing Partnerships working paper, <u>Building and Preserving Affordable Homes Near Transit: Affordable TOD as a Greenhouse Gas Reduction and Equity Strategy,</u> households with incomes less than $20,000/year are at least 4 times more likely to use transit and at least 5 times more likely not to own a car than higher income groups. New and improved transit stations attract higher income residents (with higher car ownership) and, without careful attention to housing affordability, can either render the area unaffordable to lower-income households or displace existing lower income residents. Such impacts significantly reduce the transit ridership and GHG reductions benefits of transit investments. Building and preserving affordable housing, and preventing displacement, near transit stations, can help ensure that lower-income, high-propensity transit riders live near transit

Development of affordable homes also is an effective tool against displacement. A recent study by the Institute for Governmental Studies at UC Berkeley found that while at the regional level, both market-rate and subsidized housing reduce displacement pressures, subsidized housing has over *double* the impact of market-rate units. In addition, supporting the development of location efficient affordable homes is also a proven strategy to reduce air pollution, reduce VMT, and

environmental damage. Building affordable homes close to jobs, will ensure low wage workers do not have to commute long distances to do the jobs critical to the economic viability of communities, regions and the state. This is especially true in rural communities.

Smaller cities and other less densely populated rural communities also offer an opportunity to promote infill development with the potential to address both the need for additional affordable homes and reinforce the viability of walkable downtowns with local services and amenities. Communities like Lanare in Fresno County, Fairmead in Madera County, or Le Grand in Merced County have a small overall footprint and significant vacant land. Providing public investments in walkability, infill housing development, and modest new construction for commercial and residential uses could create the kind of mixed-use, pedestrian friendly environment to support GHG and VMT reductions. Compared with housing developments at the edge of incorporated cities, new housing units within the existing footprints of rural communities would have a smaller greenfield development impact – and would offer workers in the agricultural industry the benefit of proximity to their employment.

- **Incorporate natural resources and working lands conservation strategies to optimize GHG reductions and achieve other public benefits**

We appreciate the commitment to developing quantifiable targets to limit the conversion of California's most productive farmland, rangeland, and forests. The conservation and management of natural and working lands and water resources is a state climate priority, as it has been one of the five pillars to achieve climate goals (mitigation and adaptation) and health policy goals. In transportation planning and project development, incorporating land conservation early and robustly can benefit both climate and transportation goals through carbon sequestration, avoided VMT, more effective project delivery, better project outcomes, reduced risk and protection of critical natural resources. Four strategies in particular should be highlighted in the documents:

- Incorporate performance metrics that measure impacts to and benefits of natural resources and working lands so that transportation agencies can avoid and minimize these impacts and foster climate benefits from the land base
- Incorporate a Regional Open Space and Conservation Area Framework that identifies regionally significant natural resources and working lands and habitat connectivity strategies. Regional Greenprints have been completed in areas of the state, and AB 2087, recently signed into law, establishes Regional Conservation Investment Strategies (RCIS).
- Encourage comprehensive regional mitigation programs such as Regional Advance Mitigation Planning or Natural Communities Conservation Plans, or RCIS's that can be used for mitigation.
- Incorporate a role for natural infrastructure, consistent with the Executive Order B-30-15 as a climate mitigation and adaptation strategy.

- **Enhance mobility, equity, and sustainability through emerging technology and shared mobility options such as bike share, car share, ride share**

Local, regional, and state governments in California and across the country are grappling with how best to deliver transportation investments into the future. Mobility as a service, instead of mobility as concrete infrastructure, continues to gain traction. As the City of Los Angeles has recently done in its *Urban Mobility in a Digital Age* strategy, proactively developing a plan to enhance mobility, equity, and sustainability through emerging technology and shared mobility options such as bike share, car share, ride share will be critical to ensuring that largely market-driven technologies can be used to help meet local, regional, and Scoping Plan goals. NRDC is currently conducting a study with UC Berkeley's Transportation Sustainability Research Center (TSRC) on the first-ever climate impacts analysis of the ridesourcing/ transportation network companies (TNCs), Uber and Lyft. The report, anticipated to be released in January, will be instrumental in identifying ridesourcing outcomes on climate impacts and its findings should be strongly considered in the final Scoping Plan.

Although rideshare companies such as Uber and Lyft have become widely-used single occupancy transportation modes among middle income communities, low-income residents and rural areas have largely been excluded from these services, primarily due to barriers in affordability and technology (i.e. requirement of a smart phone/broadband, cost of service, etc.). As these private companies continue to gain popularity and strip transit ridership among those with access to transportation choices, we must ensure that this does not negatively impact how the state and its regions invest in transit operations overall, and particularly within low-income communities and communities of color.

As the state continues to explore shared mobility as a VMT reduction strategy, identifying approaches for pilot programs and scalable programs that expressly prioritize communities of color and low-income communities must be incorporated. We anticipate the Los Angeles Low-Income Electric Vehicle Carshare pilot will serve as a model to increase mobility, lower emissions, and reduce household transportation costs. Even before its launch, the pilot program is already producing replicable equity strategies through research on pricing and community outreach commissioned by the Los Angeles Sustainability Collaborative.

- **Direct significant investment in rural communities now to ensure these communities can significantly contribute to meeting California's GHG reduction goals, while supporting local economies and agriculture, natural resources, and promoting healthy, active and affordable living**

State Climate Goals and Programs have the potential to transform the current development patterns of rural California. Unlike many of their urban counterparts, rural communities have the ability to significantly change land use patterns now to avoid some of the challenges built-out communities face. However, rural communities are significantly under-sourced, have

nonexistent or limited infrastructure, and too often lack the technical capacity to support the needed transformational land use practices that support the State's Climate goals. Significant investment in rural communities now, will ensure these communities can significantly contribute to meeting California's GHG reduction goals, while supporting local economies and agriculture, natural resources, and promoting healthy, active and affordable living.

Rural communities and small cities can demonstrate significant contributions to reduced VMT and GHGs, and those contributions reflect the unique circumstances and conditions of rural communities and small cities. Location Efficient housing in rural communities, for example, can significantly reduce VMT by building affordable housing near amenities or by supporting developments that include both affordable housing and services such as health care and child care, along with shared vehicles or vanpools for residents to travel to and from work and school will support significant GHG reductions while also providing critical investments in disadvantaged rural communities. Additionally, State Climate goals and programs should give more weight to green building and energy efficiency which provide a significant source of GHG reductions. These effective strategies represent an important contribution of rural communities to climate goals. Building Zero Net Energy and energy efficient homes significantly contribute to GHG reductions and rural communities have and will continue to make important progress in addressing GHG reductions through these strategies provided resources and investments can be targeted to these strategies.

The State must also ensure that transit programs and projects extend to and reflect the opportunities in rural areas and small cities. Transit providers must prioritize improved service in underserved areas with unmet transit needs. State, regional and local policies should also be responsive to transit needs in diverse geographies. In some areas expanded and improved fixed route service will address unmet needs, while in others vanpool and rideshare programs will better expand transportation opportunities to small towns and communities. Finally several rural areas lack infrastructure necessary to support transit. State investment policies should support transit supporting infrastructure and other basic infrastructure such as sidewalks, streetlights, drinking water and wastewater infrastructure to improve transit service, facilitate infill development, and support active transportation in rural areas and small cities that lack such basic infrastructure. Strategic investments and land use policies that prioritize basic infrastructure, transit and housing in rural communities and small cities will help California reach its climate goals by supporting infill development, reducing sprawl, increasing mode shift, and preserving working and open lands.

The Pricing Policies must also have equity protections in place that ensure that low-income, disadvantaged communities are not disproportionately burdened by these programs, especially when they do not have transit or active transportation options to access work, education or services. State strategies reliant on growth of the electric vehicle industry are not a realistic

option from many lower income residents and rural areas. These communities lack the electricity infrastructure necessary to support such heavy additions to the electric grid. Lower-income residents are also highly unlikely to be able to afford the high cost of purchasing and maintaining electric vehicles. A 'one size fits all' approach reliant on electric vehicles neglects a large proportion of California's residents, and demonstrates that widespread initiatives such as this must also address the barriers that rural California and low income residents may face in tapping into such strategies.

- **Better integrate production of public health co-benefits along with elimination of health disparity detriments in the scoping plan and related documents.**

Public health could be better addressed in both documents, as well as adopting the improvement of health outcomes as an overarching requirement within of the Scoping Plan. If we achieve climate improvement standards timely by 2030 and 2050,public health will improve. The health cost savings to the state as well as to the locality and to the individual can then be reinvested in VMT reduction investments, continually growing the reduction of VMT. The way we invest in transportation and land use impacts public health in many ways. In the VMT document, public health is only mentioned once in the introductory paragraph, yet many of the strategies impact the health of residents across the state. For instance, building more transit-accessible infill development allows more people to live in places where they can walk and bike, thereby promoting physical activity with improved health outcomes.. Improving transportation system efficiency has been demonstrated to incentivize more people to walk, bike and ride transit, as well as reduce congestion which can improve air quality. When more residents employ The active transportation and transit, the VMT reduction further improves air quality, reducing lung, heart and other health determinants for better strategies also further public health goals.

These documents should also focus on health equity, identifying strategies for improving the health outcomes of residents living in the State's disadvantaged communities, specifically in the "Equity" sections of the VMT document. This should include a greater discussion of affordable housing and displacement, as mentioned above. In the "Vibrant Communities and Landscapes" document, public health is mostly mentioned in the context of land conservation, and it should be integrated throughout.

- **Strengthen active and public transportation strategies and call for greater investments in these modes, their operations and maintenance**

We are very supportive of the active transportation strategies identified in Section II of the VMT document. As the first bullet point notes, the State has ambitious goals to increase mode share of people walking and biking. We cannot get there unless we invest more funding in active transportation-funding at least equal to the targeted mode share and tied to automatically grow with increasing mode share. The Active Transportation Program (ATP) is the State's primary source for funding of walking and biking projects and programs. It is heavily oversubscribed

each cycle. It receives an infinitesimal share of the state's total transportation funding each year. The Scoping Plan can require state, regions, counties and local cities to invest and peg transportation dollars in conformity with mode share goals, reducing freeway investment as VMT reduction occurs.

In addition, new road as well as road maintenance projects should always be designed to create "complete streets" with safe, connected access for people to bike, walk and access transit anywhere that those facilities were previously lacking. All streets in our communities need to prioritize alternatives to driving in order to make it more convenient and attractive to use more healthy, sustainable modes. Thus, we feel a separate bullet point on increasing investment in the ATP, ensuring every road maintenance and new road project is a "complete street", and funding active transportation improvements through other state funding sources is appropriate.

Second, there should be a strong focus on equity in this section. It is noted in subsection H, but because many low-income and communities of color walk and bike at higher rates, and also suffer a disproportionate share of the injuries and fatalities, the State should ensure that the active transportation strategies are prioritizing the needs of disadvantaged communities.

There should be greater coordination across the strategies for the various modes in this section. For instance, under Transit, include strategies to support first and last mile active transportation facilities so people can walk and bike to transit stations. The Shared Mobility section could also mention this first-last mile issue and address equity considerations. The Research section could call for more research on active transportation and its role in reducing GHG emissions.

In addition, we appreciate the focus on education in the third bullet point. Noninfrastructure programs such as Safe Routes to School, pedestrian and bike safety education and Vision Zero efforts are needed to teach children and adults alike about safe behavior on our roads, as well as get them more comfortable with public transit, walking and biking. We will not see the behavior change we need to meet our state goals unless we invest in fare reduction strategies, noninfrastructure activities, as well as infrastructure. We also recommend mentioning planning here as an important strategy, as many communities, especially disadvantaged ones, do not have pedestrian, bicycle or Safe Routes to School plans that are often prerequisites for active transportation funding. Creating plans also promotes community engagement and can provide a forum to talk about community infrastructure needs.

Finally, we are supportive of the Transportation System Efficiency, Subsection D strategies that will explore incentives for the use of transit and active transportation for commuting, as well as promoting travel to schools via these modes. Approximately 10-14% of morning congestion is due to school drop-off, and finding ways to reduce the number of parents and buses on the road can significantly contribute to reducing VMT.

- **Ensure the Scoping Plan continues to promote SB 375 higher targets and include other strategies to help our regions ensure we meet our climate and equity goals**

In the draft documents for the scoping plan, we support the recommendation for a higher SB 375 greenhouse gas reduction target. Since SB 375 was adopted in 2008, it has transformed how regions plan for land use and transportation. In addition, achieving stronger SB 375 targets provide meaningful health and equity co-benefits. In the past eight years, we have seen regions develop visionary plans that include a number of strategies to meet the goals of SB 375 — as well as the state goals. Now, with the passage of SB 32, we recommend the Scoping Plan continue to promote higher targets as well as include new strategies to help California's metropolitan regions ensure we meet our state's ambitious goals for climate and social equity.

We recommend the ARB scoping plan include strategies to help California's regions do the following:

- Shift funds away from road expansion to road maintenance, transit operations, fare reduction, active transportation, vanpools, and other programs that lower per capita VMT and meet the goals of SB 375: Historically transportation funding has prioritized road expansion and highway construction. To achieve the goals of SB 375 — and meet our ambitious climate laws — Metropolitan Planning Organizations (MPOs) will need to prioritize transportation funding for road maintenance, and accelerate investments in transit operations and maintenance, active transportation, and other transportation programs that will reduce VMT.
- Support focused growth land use patterns that protect important natural and agricultural lands and encourage infill development that is well served by transit for residents across the income spectrum. In terms of reducing greenhouse gas emissions and vehicle miles traveled, the Scoping Plan should facilitate greater mode shifts to active and public modes of transportation, as well as land use recommendations that promote equitable infill and transit-oriented development for all income levels instead of sprawl.
- Addressing Housing Needs: SB 375 calls for more concentrated development patterns that reduce sprawl in favor of walkable, transit-oriented communities. However, without careful attention to housing affordability, these shifts can exacerbate affordable housing and displacement issues by failing to provide sufficient housing opportunities for low income residents, particularly in low-income communities of color. Planning and investment in transportation must explicitly account for, and to the greatest extent possible, seek to avoid or mitigate displacement and lack of affordable housing, especially since research shows that when existing residents are displaced due to unaffordable housing near transit, GHG emissions increase due to lengthening commutes and auto-intensive travel patterns.
- Account for GHG emissions: One of the goal of SB 375 is to reduce vehicle miles travelled through smarter land use and transportation planning. Despite the many strong

RTP/SCSs that have been adopted thus far, we have seen a lack of clarity regarding how the projected GHG reductions are achieved— specifically, which GHG reductions can be attributed directly to land use change and VMT reducing strategies vs. non-VMT oriented strategies (for example, increased EV use). Guidance is greatly needed for how MPOs can and should be able to better account for what strategies their GHG reductions are associated with to ensure effectiveness of the SCS, in accordance with the goals of SB 375.

- **Identify the Impacts of Freight Investments on Health Outcomes in Disadvantaged Communities**

While the transportation workshop did not focus on freight, we resubmit the comments that ClimatePlan partners submitted during the RTP Guidelines in order to highlight the need to address freight investments in a coordinated way as part of the larger transportation sector.

We reiterate the comments submitted by the California Clean Freight Coalition (CCFC) on the RTP Guidelines. The Guidelines present a unique opportunity to go beyond the traditional confines of guidance documents and direct comprehensive freight emissions reductions that would generate positive health outcomes in the communities which would most benefit from improved land use planning and infrastructure investments.

Detrimental impacts on Air Quality are only a facet of the multiple challenges that should be integral components of guidance provided on goods movement in the Draft Guidelines. Numerous studies clearly demonstrate the strongest correlation between a community and air quality is race, not income. The overwhelming majority of residents living in close proximity to freight hubs are communities of color. The Goods Movement industry and the detrimental air pollution have long been and continue to be significant environmental justice issues.

The Guidelines should provide clear criteria, based on socio-economic, health and air quality assessments, that ensure future logistics centers are not placed within or adjacent to overburdened communities.

We advise the Guidelines include all recommendations presented by CCFC as well as the following:

- Disaggregated analysis of the impacts of Freight: The sections related to the goods movement should include a comprehensive analysis disaggregated by race, place and income of air quality standards and health impacts in the State's major freight corridors.
- Guidance to curb logistics sprawl, particularly in disadvantaged communities: Land use as it related to goods movement should place particular emphasis on ensuring logistics centers do not increase socio-economic and/or environmental burdens in the State's Disadvantaged communities. The Guidelines should provide clear criteria, based on

socio-economic, health and air quality assessments, that ensure future logistics centers are not placed within or adjacent to overburdened communities.

- Guidance for sensitive land use mitigation: As cited, vulnerable populations are at greater risk from suffering from the detrimental health outcomes related to freight. It would follow that the Guidelines should provide explicit guidance on necessary mitigation measures for sensitive land uses such as schools, hospitals and housing.

In closing, we appreciate your visionary leadership to make sure we achieve our ambitious climate goals. Thank you very much for your consideration of our requests and your ongoing commitment. We look forward to working with you to create more sustainable, equitable and healthy communities.

Sincerely,

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