



SOUTHERN CALIFORNIA CONTRACTORS ASSOCIATION

Greg Salsbury, *President*, Salsbury Engineering, Inc.
Warren Schmidt, *Vice President*, VTMI
Mike Rodriguez, *Secretary/Treasurer*, Security Paving Company
Scott MacIntosh, *Immediate Past President*, A.L. MacIntosh Company
Clayton Miller, *Executive Vice President*, Southern California Contractors Association

September 28, 2016

Submitted via email to ca.50m@opr.ca.gov
Submitted electronically to [scoplan2030trnspt-ws](#)

Mr. Ken Alex, Director
Governor's Office of Planning and Research
P.O. Box 3044
Sacramento, CA 95812

Re: Vibrant Communities and Landscapes. A Vision for California in 2050. Draft for Comment & Discussion

Dear Mr. Alex:

On behalf of the Southern California Contractors Association (SCCA), please consider the following comments on the document "Vibrant Communities and Landscapes – A Vision for California in 2050 Draft for Comment & Discussion" (Vibrant Communities) dated September 2016.

SCCA has several very serious concerns regarding the Vibrant Communities document. These include the process by which this document was made available to the public, the lack of transparency of eight state agencies¹ involved in the development of the document, the inability of California stakeholders to participate in discussions that informed the development of a document with such broad scope and reach, the potential impacts of the proposed actions, and the insufficient time available for public review and comment.

The draft Vibrant Communities document was referenced in a California Air Resources Board (CARB) Public Workshop on the Transportation Sector to Inform Development of the 2030 Target Scoping Plan Update in Sacramento on September 14, 2016. The CARB website indicates that the public has two weeks to submit comments on the presentation. Under any circumstances an abbreviated comment period of only two weeks is not adequate to address the development of actions that will impact the lives of every individual that resides in or visits the state of California. For those unable to attend or not aware of the CARB public workshop, the ability to review and comment on the Vibrant Communities document is suspect. The results of an online search performed September 28, 2016 (comment deadline) at CA.gov using the Agencies tab for the draft document results in the following screen message – No results found for "Vibrant Communities and Landscapes A vision statement for California in 2050."

¹ Business, Consumer Services and Housing Agency, California Environmental Protection Agency, California Natural Resources Agency, California State Transportation Agency, California Health and Human Services Agency, California Department of Food and Agriculture, the Strategic Growth Council, and the Governor's Office of Planning and Research.

September 28, 2016

Mr. Ken Alex

Page 2

Further SCCA is not aware of any public workshops held by any of the eight agencies that collaborated on the development of the draft Vibrant Communities document.

The draft document indicates that the state will prioritize eight actions "to maximize GHG emission reductions through the conservation and protection of natural and working lands, reductions in vehicle miles traveled, and direct emission reductions associated with compact development patterns." Each of the proposed actions are summarized in a single paragraph without any supporting data or analyses to support the stated benefits of the proposed actions nor any references given to other state priorities or goals that could conflict with and be negatively impacted by such actions. A thorough public discussion needs to take place.

For the reasons above, SCCA requests that the Vibrant Communities document be withdrawn pending further public discussion and consideration.

Sincerely,

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

Clayton Miller,
Executive Vice President