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Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
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**Re: 2030 Target Scoping Plan Workshop – Transportation Sector**

Dear Chair Nichols:

The California State Association of Counties (CSAC) appreciates the opportunity to provide comments on the California Air Resources Board 2030 target scoping plan workshop focused on the transportation sector. Our high-level comments will focus on the “Land Use Vision and Goals” and “VMT Reduction Strategies” discussed at the workshop. The outlined vision and strategies are broad, far reaching, and touch upon core responsibilities and authorities of local governments. CSAC looks forward to reviewing the strategies as further details are developed during the scoping plan update process, especially considering the short timeframe provided to review these strategies and to provide comments.

CSAC supports partnerships between local governments and the state to encourage the development and preservation of a multi-modal transportation network that provides mobility for Californians and alternatives to driving; we support incentives, regulatory streamlining, and infrastructure funding to promote the development of location-efficient infill housing in all of California's urbanized communities; and we support incentives and funding for the preservation of natural resources and agricultural lands, efforts which can help promote compact development and limit greenhouse gas (GHG) emissions from the transportation sector. Accordingly, it is encouraging that the two draft documents presented at the workshop include many strategies consistent with these county priorities. We hope that identifying these long-standing county priorities as fundamental to meeting California's ambitious emissions reduction goals will encourage better alignment of the state's policy decisions and funding allocations with these objectives.

CSAC strongly recommends that strategies be prioritized by cost, feasibility and appropriate levels of governmental authority. Statewide planning efforts should tier off of rather than replace successful local efforts, and funding for implementation must accompany new mandates for local government planning and/or projects. We offer the following further comments on specific issues contemplated within the documents.

**Funding for Local Planning.** Many local governments in California have not updated their General Plans and other important planning documents for some time, especially since the passage of AB 32 and SB 375. In order for planning at the local level to effectuate land management practices that align with these goals, a significant investment of time and resources is required. Until local governments have the resources to do this type of work, it will be difficult to implement a larger strategy as outlined in the scoping plan update. Investing in local planning efforts will be beneficial to not only investment decisions within the transportation system but with regards to housing, community development, working lands and land conservation, and overall for other critical infrastructure to support

sustainable and efficient growth in the state. Local planning documents are foundational and their importance cannot be diminished.

**Land Conservation.** Counties support fiscal incentives to preserve open space and agricultural lands. Funding sources that have previously supported such land conservation and compact development goals have diminished or been eliminated from the budget over the last several years, or replaced with more limited alternatives. For example, state funding for the Williamson Act, which sought to create fiscal incentives against the conversion of agricultural land for both counties and landowners, has been eliminated. The state also failed to appropriate funding for payments in lieu of taxes (PILT) for wildlife conservation lands it owns for many years. The acquisition of additional lands in areas with limited tax bases and economic development opportunities must be mitigated. To the extent that fiscal incentives are used to promote local land use decisions that complement the state's emission reduction goals, the state should provide dedicated and reliable funding to that end.

**Transportation Infrastructure.** State funding from the state gasoline excise tax – a user fee all California motorists pay – for local streets and roads and state highway infrastructure has decreased in real terms as gas prices have declined and the fuel economy of vehicles has improved. Our transit systems are significantly underfunded as well. Local funding makes up an increasing share of total investment in system preservation as state funding has decreased. Local streets and roads currently need \$79 billion over the next decade just to maintain and operate our existing local transportation network. The state faces an additional \$59 billion in deferred maintenance. Accordingly, CSAC is pleased that the land use vision identifies a fix-it-first strategy as consistent with the state's conservation and development goals. Unfortunately, it is impossible for local governments to maintain the current system, much less comprehensively retrofit it to better accommodate transit and active modes of transportation, without a significant infusion of new funding.

**Affordable Housing.** The availability and affordability of housing in California is at crisis levels. Counties, and our city and regional partners, need a strong commitment from the state in order to promote housing development affordable at all income levels. Housing in close proximity to a multitude of transportation options, good paying job opportunities, and schools and other services is a vital piece of our climate change puzzle. CSAC is committed to seeking opportunities to incentivize development at the local level by reducing regulatory barriers and uncertainty in the development decision-making process but such development, especially if it is to promote equity and provide for housing affordable to all income levels, will also require significant and sustained financial resources from the state.

Again, CSAC looks forward to future opportunities to provide more in-depth comments on these and other issues as the scoping plan is revised to provide greater detail on the priorities and policies within these preliminary documents.

Sincerely,



Kiana Valentine  
Legislative Representative