

Department of Conservation and Development

30 Muir Road
Martinez, CA 94553

Phone: 1-855-323-2626

Contra Costa County



John Kopchik
Director

Aruna Bhat
Deputy Director

Jason Crapo
Deputy Director

Maureen Toms
Deputy Director

Kara Douglas
Assistant Deputy Director

Victoria Mejia
Business Operations Manager

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California Air Resources Board
Sacramento, California

Air Resources Board:

The Contra Costa County Department of Conservation and Development (DCD) is pleased to submit these comments on the 2030 Target Scoping Plan, Transportation Sector. DCD appreciates the statement in the *2030 Target Scoping Plan Update Concept Paper* regarding "...a comprehensive approach to achieve the State's climate goals...." It is in this light that we make the following comments. The County's comments at this time are in three areas: life-cycle costing, school siting policies, and fleet and ride sharing. We encourage the California Air Resources Board (CARB) to actively address these issues, which are important to our ability to support the State in achieving its ambitious goals.

Life-Cycle Costs

A key challenge for Contra Costa County and other local governments, is ongoing operation and maintenance (O&M) of infrastructure. This includes all aspects of the built environment: buildings, roads, parks, other infrastructure. The County is not unique in this challenge. As California begins to implement more aggressive climate goals, the State should be thinking about new methodologies for anticipating project costs. In particular, it is evident from the *Concept Paper* and the presentations at the September 14 workshop that California will need a different transportation system than the one we have currently, and that this new transportation system will be more expensive to maintain. Traditional accounting methods that look only at initial project cost lead to situations where infrastructure fails, at greater replacement cost than if ongoing O&M had been included from the beginning. This would include methodologies for internalizing the social and environmental costs of projects. The California Adaptation Forum, held earlier this month, included several sessions on this concept.

The State is uniquely situated to provide leadership and guidance on new methods for approaching project costs, particularly in the context of the new transportation system that will be required to meet the SB 32 goals. The documents released for public review should be updated to include discussion of new approaches to project costing. The State also should

model these concepts. As an initial step, we recommend that CARB consult with the State Controller and the Treasurer to identify options for using life-cycle costing. We also recommend that CARB work with local governments and the business sector, and look forward to participating in that process.

School Siting Policies

The education sector is missing from the land use discussions in the Scoping Plan documents. The California Department of Education (CDE) should be brought in to this “comprehensive approach.” CDE’s school siting policies have a direct impact on the State’s GHG reduction goals (among other State goals and policies regarding active transportation, vision zero, health in all policies, bicycle/pedestrian safety, etc.), and have the potential to directly undermine the State’s goals.

State policies are contributing to sprawl in our area through the lack of effective regulations on the siting of new schools. The attached map shows schools sites on the exurban edge, most outside of the locally developed, voter approved urban limit line. This sprawl drives increases in vehicle miles travelled (VMT) and is in direct conflict with AB32/SB375 goals.

The state has acknowledged this problem over the years since AB 32 and SB 375 were adopted:

- The Superintendent of Public Instruction has acknowledged the issue in two published studies¹.
- The original AB32 scoping plan in 2008 included school siting requirements in the draft plan. Those requirements were removed in the final draft.
- Early implementation of the Health in All Policies initiative included school siting as an issue; that issue was removed in later planning documents.
- CDE and the Office of Policy and Research acknowledged that school siting needs to be addressed at a Policy Symposium in 2012. Specifically, these agencies stated that school siting needs to be brought under the fold of the new land use planning paradigm initiated by AB32, SB375, etc. There has been no progress on this issue to date.
- While school siting is partly the responsibility of local school districts, Districts site schools based on State guidance.

The 2030 Target Scoping Plan Concept Paper discusses “co-benefits”. Unfortunately, existing state school siting practices have co-disadvantages or co-penalties along with the inevitable VMT increases. These include farmland conversion, further reductions in active transportation rates to/from schools for the K-12 population, and compromised student safety due to the lack of adequate transportation infrastructure in these rural areas.

¹ California’s K-12 Educational Infrastructure Investments: Leveraging the State’s Role for Quality School Facilities in Sustainable Communities, Report to the CA Dept of Education by UC Berkeley Center for Cities & Schools, and 2011 - Schools of the Future Report, Tom Torlakson/State Superintendent of Public Instruction

DCD understands that CDE is initiating an effort to revise Title 5/School Construction guidance. CARB should engage in this process to ensure that any changes are effective, compulsory, and enforced.

In order to increase the chances of success on this critical issue, we also recommend early outreach to the building industry on this topic.

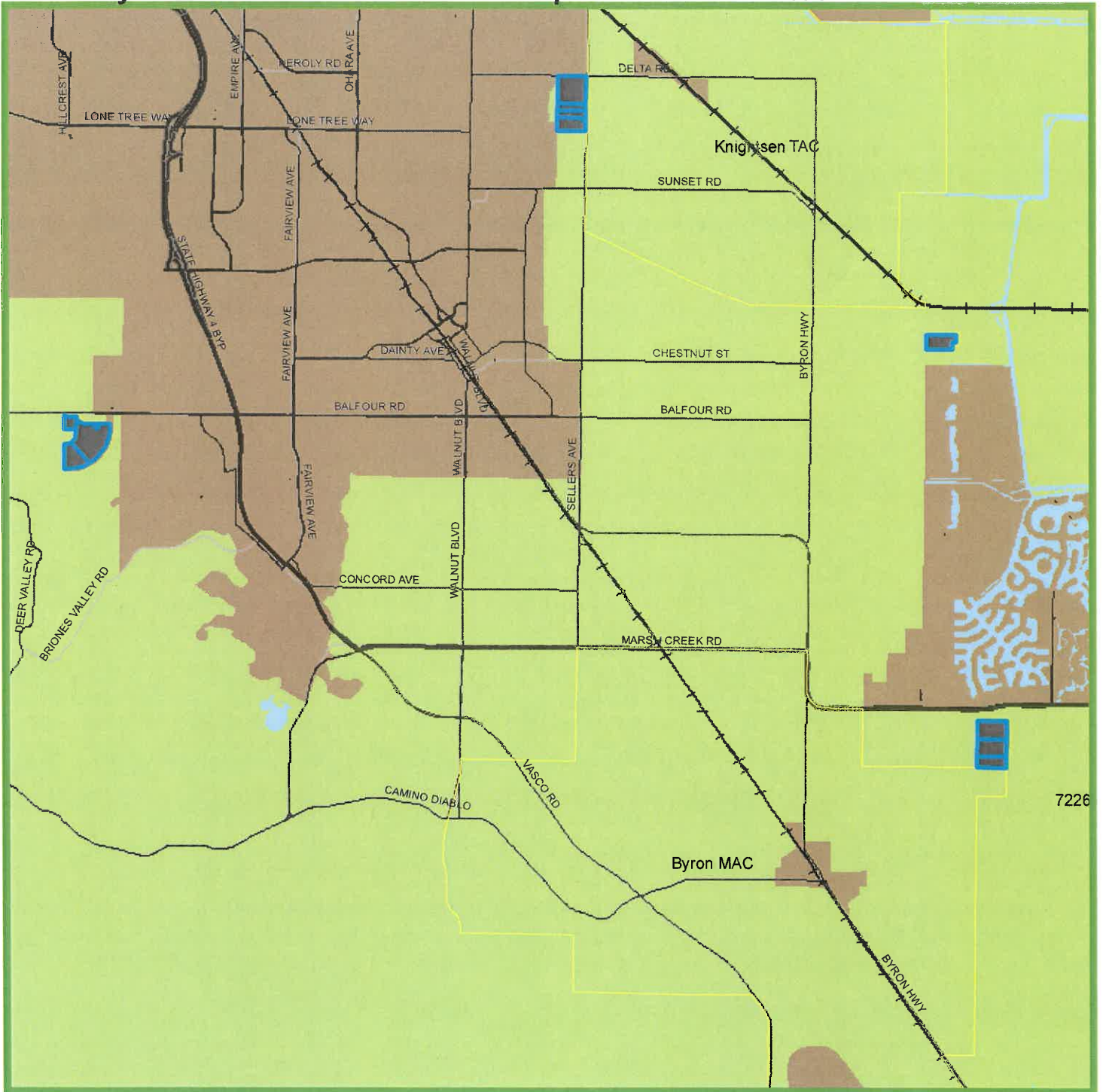
Thank you for your consideration of these comments. We look forward to working with the State on these critical issues.

Sincerely,



John Kopchik
Director
Department of Conservation and Development

East Contra Costa County: Urban Limit Line & Recently Constructed Schools or Acquired School Sites



Urban Limit Line

- Outside
- Inside
- Recently Constructed Schools or Acquired School Sites

