

November 13, 2015

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

RE: Cap-and-Trade Auction Proceeds Draft Second Investment Plan: Fiscal Years 2016-17 through 2018-19

Dear Chair Nichols and Board Members:

The undersigned organizations represent the Coalition for Active Transportation Leadership and allied partners, and appreciate this opportunity to provide comments on the Cap-and-Trade Auction Proceeds Draft Second Investment Plan. We commend Air Resources Board staff for their work to develop the Draft Second Investment Plan and to solicit public input through several rounds of workshops around the state on both the Second Investment Plan Concept Paper and on the Draft Second Investment Plan. Our comments include a few recommendations for additions to specific sections in the Draft Second Investment Plan, and outline our highest priority investment areas.

Below are recommendations for additions to specific sections in the Draft Second Investment Plan:

Part I. California Climate Investment Goals

B. Benefitting California's Most Disadvantaged Communities (p.2) - We support the two paths currently being pursued to provide technical assistance to disadvantaged communities in accessing the benefits of climate investments. However, we urge ARB and other state agencies that administer GGRF-funded programs to do more to ensure that the communities that have been most negatively impacted and historically benefited least from state investments receive the most meaningful, community-identified benefits from climate investments.

We recommend that state agencies provide deeper technical assistance to disadvantaged communities for public engagement, project development, and application preparation across all GGRF-funded programs, similar to the assistance that the Strategic Growth Council (SGC) will be providing for the Affordable Housing and Sustainable Communities (AHSC) Program, and in addition to the planned targeted outreach and promotion of funding programs to disadvantaged communities. In addition, we have urged the SGC to expand its offering of deeper technical assistance beyond unsuccessful first round applicants to new potential applicants from disadvantaged communities that were unprepared or unable to submit an application in the first round of AHSC.

C. Increasing Rural Community Participation (p.3) - We support the theme of increasing rural community participation and benefits from climate investments and recommend that this section expand on rural community investment opportunities to include active transportation, transit, and other transportation opportunities in rural communities in addition to agriculture and

conservation efforts and the AHSC rural project set-aside. Where feasible and appropriate, we recommend setting a minimum floor for funding to rural communities across other GGRF-funded programs. Access to affordable, sustainable, and convenient transportation options is vital to supporting economic development and public health in rural disadvantaged communities and should be highlighted as an important climate investment opportunity.

Part III. Climate Pollutant Emission Reduction Strategies

A. Strategies to Achieve the 2020 Greenhouse Gas Emission Reduction Target (p.11) - In May 2015 Caltrans adopted a Strategic Management Plan 2015-2020, with ambitious goals to reduce vehicle-miles traveled and greenhouse gas emissions, and increase alternative modes of transportation including tripling bicycling, doubling walking, and doubling transit use statewide by 2020. Caltrans has convened internal and external stakeholder “teams” to implement the objectives identified in the Strategic Management Plan and track progress toward reaching the goals. In addition to the other Caltrans plans mentioned in the Draft Second Investment Plan, the *Caltrans Strategic Management Plan 2015-2020* should be highlighted in this section as yet another planning effort that will contribute to reaching our 2020 climate goals.

Part VI. Current Strategy Gaps and Draft Investment Concepts

A. Potential Cross-Cutting Approaches (p.28) - We support the emphasis on cross cutting approaches to integrate eligible project types and achieve multiple benefits for communities, especially disadvantaged communities with limited access to resources locally. Another key cross-cutting opportunity in the transportation sector is to leverage existing federal and state transportation infrastructure funding with GGRF investments. Currently, the vast majority of these funds continue to support road projects to move single occupancy cars and trucks, and many of those projects negatively contribute towards meeting our mid- and long-term climate goals. The Second Investment Plan could recommend opportunities to leverage existing transportation funds such as State Transportation Improvement Program (STIP) dollars with transit capital, active transportation, and other sustainable communities investments to increase the impact and effectiveness of GGRF transportation investments. Directing traditional state and federal transportation funds, which are an order of magnitude larger than the current annual Cap-and-Trade auction proceeds, toward investments that reduce vehicle-miles traveled and contribute to reaching our climate goals is critical, or we risk backsliding on any progress made with GGRF investments in transportation.

B. Transportation and Sustainable Communities, 1. Existing Situation (p.30) - We recommend this section also include the mandate established by Senate Bill 391 (Lowenthal, 2009) for comprehensive planning by Caltrans to reduce transportation emissions statewide through the California Transportation Plan 2040 (CTP 2040). The CTP 2040 is a key element of reaching our statewide emissions goals across the entire transportation sector, including the Metropolitan Sustainable Communities Strategies and the additional transportation strategies described in the Draft Second Investment Plan.

B. Transportation and Sustainable Communities, 3. Gaps and Needs Assessment (p.32) - This section should more strongly emphasize the need to reduce vehicle-miles traveled statewide (not only in metro regions through implementation of sustainable communities strategies) by 4 percent in order to reach post-2020 climate goals, in addition to ambitious deployment of clean vehicles and fuels and despite a growing population. This reduction in VMT can only be achieved by significant changes to transportation infrastructure and the built environment that make walking, bicycling, and taking transit more convenient, attractive, and affordable than driving alone.

In addition to the specific comments on sections of the Draft Second Investment Plan above, we support the following priority investments:

Affordable Housing and Sustainable Communities

We support the continuous appropriation to the AHSC Program, and the goals of the AHSC to invest in complementary affordable housing development and sustainable transportation projects. The AHSC aims to support active transportation infrastructure that provides connectivity between affordable housing and transit. However, walking and bicycling projects that create neighborhood connectivity beyond the immediate development were limited in the first funding cycle. We anticipate improvements to the program guidelines in the next funding cycle that will incentivize more robust active transportation projects, and continue to support investment in AHSC.

Connected Active Transportation Networks and Innovative Walking and Bicycling Infrastructure

We need increased investment in creating connected networks of active transportation infrastructure, especially infrastructure that physically-separates people bicycling and walking from high-speed or high-volume traffic like protected bikeways, trails and pathways, which provide a lower stress experience and encourage more people to shift to walking and bicycling, as well as helping children safely walk and bicycle to and from school. Investment in connected networks that provide convenient walking and bicycling routes without dangerous gaps to multiple key destinations within neighborhoods are critical to spur the level of mode shift that the CTP 2040 anticipates. This investment should be made through programs such as the Active Transportation Program, which have the primary purpose of increasing walking and bicycling, in coordination with investments in the AHSC Program. The Active Transportation Program is significantly oversubscribed on the order of five to one and additional funds from the GGRF would increase the capacity of the program to fund larger connected network projects. We recommend calling out the significant need for investment in active transportation networks and the current shortfall in funding to the Active Transportation Program in the Second Investment Plan.

First- and Last-Mile Walking and Bicycling Access to Transit

We also recommend greater emphasis in the Second Investment Plan on investment in first- and last-mile infrastructure to facilitate walking and bicycling to transit through transit capital and

high-speed rail investments. Research shows that first- and last-mile improvements around transit stops and stations to make it easier, safer and more attractive to walk and bicycle to access transit results in direct increases to levels of transit ridership.

Climate-Smart Green Active Transportation Infrastructure

Connecting communities using multi-benefit green infrastructure like greenways, green alleys and parks will encourage active transportation and provide multiple additional benefits such as stormwater capture and urban cooling, especially in communities that lack green space. California should promote green active transportation infrastructure to ensure there are attractive, comfortable, and safe routes to walk and bicycle on the first/last several miles between people, their destinations, and transit connections. We recommend including clear eligibility for multi-benefit green active transportation infrastructure in the Second Investment Plan. Investments in the establishment, expansion or improvement of paved, regional trails networks (i.e. American River Bikeway and Iron Horse Trail) that serve to connect communities and improving non-motorized commuter experiences through design features including lighting, landscaping and smoothing projects (i.e. tunnels and overpasses to bypass congested road intersections) will increase user volumes.

Bicycle Rebates

High-quality utilitarian bicycles such as electric bicycles, cargo bicycles, folding bicycles, and other models of commuter bicycles are growing in popularity for transportation purposes and in most cases are used for direct replacement of vehicle trips. We urge ARB to include clear eligibility for GGRF investment in rebates for bicycles in the Second Investment Plan, including incentives for limited fleets of bicycles for employer programs or bicycle sharing systems. Such a rebate program could be partially or fully targeted to low-income residents, and would provide significant co-benefits, including improving air quality and public health through increased physical activity, and promoting local bicycle businesses.

Transit Passes

Well-designed transit pass programs have been proven to increase mode-shift and transit ridership, reducing vehicle miles traveled (VMT), while also enhancing access to education and economic opportunity. Increased access to affordable and efficient transit systems enables targeted groups such as K-12 and community college students, and low-income households to increasingly choose transit over private vehicles. Granting free or deeply discounted transit passes to these groups will result in significant mode-shifting and reductions in greenhouse gases. An added benefit is that targeting K-12 students and Community College students has the capacity to develop life-long transit riders further bolstering our transit systems.

We appreciate your consideration of these recommendations as you continue to improve the Second Investment Plan. Please contact Jeanie Ward-Waller, Policy Director for the California Bicycle Coalition, at jeanie@calbike.org with any questions.

Sincerely,

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