

ClimatePlan



July 14th, 2022

California Air Resources Board; Sustainable Communities & Climate Protection Program
1001 I Street,
Sacramento, CA 95814
Sent by email to: sustainablecommunities@arb.ca.gov

Dear Manager Kimura Szeto:

On behalf of the undersigned organizations, we respectfully submit the following comments on the 2022 Draft SB 150 report. ClimatePlan is a network of 50+ organizations that work on issues that intersect transportation, housing, land-use planning, air quality, and climate resilience. In

2017 ClimatePlan co-sponsored SB 150 (Allen). We believed the SB 150 report could be a powerful tool to achieve accountability and transparency. But the new draft report reiterates the same finding as the 2020 report: ***GHG emissions and VMT are still increasing across all regions.***

With that said, we understand that the implementation of the Climate Action Plan for Transportation Infrastructure (CAPTI) and some regions' efforts across the state are slowing the rate at which we increase our emissions. But, it still is not enough. And so, we applaud staff for their diligent research and for calling out the urgency to act. In particular, we support that the 2022 draft includes actions that

- **Accelerate delivery of VMT reducing projects and improve access to funding for high mode shift projects.**

This report is yet another example of how California needs to significantly change what is being invested in for transportation at all levels of government.^{1 2 3} This means spending transportation dollars better by prioritizing multimodal solutions. This type of investment allows for all communities to be able to access important services without depending on a car.

- **Prioritize community needs.**

Policies and investments have historically harmed Black, Indigenous, other communities of color as well as other discriminated against groups. Current planning and funding still do not account for the needs of these communities. For example, as seen in the 2022 draft report, many of them lack accessible, alternative mobility options to driving. To truly achieve the state's commitment to equity, there needs to be prioritization of community needs in all land-use and transportation policies and investments.

- **Require anti-displacement strategies in all investments.**

All communities should be able to benefit from investments. Without careful planning and policies, historical inequities will be exacerbated, further harming these communities, and forcing more driving and climate pollution from those who have the highest propensity to ride transit.

¹ Ethan N. Elkind (2015). "Moving Dollars: Aligning Transportation Spending with CA's Environmental Goals." *Berkeley Law*. Web. Retrieved from: <https://www.law.berkeley.edu/research/cee/research/climate/transportation/>.

² Sciarra, Gian-Claudia & Amy Lee (2018). "Aligning California's Transportation Funding with Its Climate Policies." *UC Davis: National Center for Sustainable Transportation*. Retrieved from <https://escholarship.org/uc/item/9jp6d597>.

³ Strategic Growth Council (2022). California Transportation Assessment Report. *Strategic Growth Council*. Web. Retrieved from: <https://sgc.ca.gov/resources/>.

- **Expand tools and resources to increase and protect affordable housing.**

It is vital that all communities are able to afford to live near jobs and other access to opportunities and they are not forced to drive to be able to get access.

We urge CARB to take leadership and work in partnership with agencies, local governments, community-based organizations, and others, to implement the actions outlined in this progress report. Overall, taking these actions would be vital to ensuring our investments and policy are holistic and move the state toward achieving its climate goals and equity commitments.

We also urge CARB to take the following initial actions to better create accountability:

1. Explicitly name state agencies, referred to in the draft 2022 report. Naming the agencies will make it easier to know which agency is undertaking the action and hold them accountable.
2. Create an accountability matrix from the list of potential actions.
3. Update the dashboard to be able to track how the actions above are being implemented.

ClimatePlan looks forward to working in partnership in this process and to ensure sustainable community strategies are implemented.

Sincerely,

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ClimatePlan

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