June 22, 2018

Fran Inman, Chair
California Transportation Commission (CTC)
1120 N Street MS 52
Sacramento, CA 95814

Mary Nichols, Chair
California Air Resources Board (CARB)
1001 “I” Street
Sacramento, CA 95814

Sent via email and submitted to the CARB public comment docket for AB 179

Re: Greater Mobility, Equity and Sustainability Through a Reduced VMT Approach |
Paradigm Framing Document & Transportation Spending Fact Sheet Attached

Dear Chair Inman and Chair Nichols:

The California Transportation Commission and California Air Resources Board have the opportunity to work together to leave a lasting positive impact in California, and really the world. Transportation is central to Californians’ daily life and the various economic sectors that they rely on to meet their needs and wants. It is also our largest source of greenhouse gas emissions, and is causing irreparable damage to the health of our planet, as well as the people of our great state.

The undersigned organizations are appealing to you both, as leaders of your respective agencies, to seize the opportunity created by AB 179. We want to offer ourselves as partners in
this endeavor, and extend our collaborative support of your efforts to work together to align mobility and climate goals. Thank you in advance for your consideration of our suggestions.

The joint meetings of the CTC and CARB are an opportunity to tackle the underlying issues that are behind the unsustainability of current transportation trends. These include practices that reinforce the primacy of single-occupancy vehicle use over more sustainable modes of transportation, from enabling sprawl development patterns to underfunding non-car modes; the siloed approach to transportation and air quality that perpetuates communities suffering from the pollution of mobile sources; as well as displacement pressures forcing longer and longer commutes.

Creating more sustainable and equitable communities requires several complementary strategies. In addition to our recommendations below focused on equitable VMT reduction, we fully support recommendations for increasing prioritization of the electrification of medium and heavy duty vehicles to reduce air pollution; focusing on communities burdened by freight traffic to improve safety and livability; and addressing issues of transportation justice in the near-term. These strategies are mutually supportive, and each are necessary -- we must not pursue one without the others.

Some of the top issues that we believe must be addressed are:

1. **Prioritizing investments in sustainable mobility options, and stopping the mis guided practice of adding road capacity in the name of congestion relief in urban, high-growth areas.** Due to induced travel, urban highway expansion does not relieve congestion nor improve mobility in the long-run, and by increasing VMT, it runs counter to our climate goals. VMT reduction is crucial to meeting our climate goals and relieving congestion. Instead, we should invest in transit and other sustainable transportation modes, both for their social equity benefits and as a more enduring strategy to reduce VMT.

2. **Aligning California’s transportation investments with its climate goals.** With better informed and performance-driven funding decisions, we can better serve Californians and shift transportation dollars away from inefficient, sprawl-oriented highway expansion projects towards sustainable mobility options, including transit and active transportation. In order to reduce VMT, people need viable alternatives that are safe, convenient and affordable. Investments in mobility options other than single-occupancy vehicle use should be prioritized.

3. **Ensuring that investments in sustainable mobility modes are accompanied by robust strategies to minimize displacement pressures.** Doing so preserves transit ridership and delivers important mobility, equity, public health and environmental gains.

To advance these ideas, we have developed some resources, which you will find attached. These include:
• A framing document describing a reduced VMT paradigm, entitled ‘More Choices, Less Traffic -- Achieving Greater Efficiency & Equity from California’s Transportation Investments’, which includes many examples and study findings to make the case for the three recommendations listed above. We have also included an executive summary of this document.

• A fact sheet assessing California’s transportation spending, entitled ‘New Goals, Old Conventions: California’s Climate Goals and Transportation Dollars’, which shows how state transportation dollars are currently being programmed across modes.

We welcome the opportunity to meet with you and discuss these topics in greater depth, and look forward to hearing your response to the ideas put forth above, including how they could inform the agenda of the December joint meeting. We hope that more cross-agency and cross-sector conversations will take place in the months ahead as we grapple with the interrelated issues of transportation, climate, equity, and health.

To that point, we support the idea of establishing an interagency work group or advisory committee to continue working on these issues in the interim between the joint CTC and CARB meetings. This work group or advisory committee should be convened jointly by CARB and CTC, and include public stakeholders engaged in the process. We have additional ideas about how this work group or advisory committee could be structured and convened, and encourage you to reach out to us for a follow-up discussion on this topic.

We also request that the December joint meeting have a full-day duration to be able to dive into the issues in greater depth, and that it either have a roundtable format or that public comment be heard prior to the Board Members’ and Commissioners’ discussion. That way the perspectives that we bring forth can help shape the conversation, or at the very least have the chance to receive a response.

If you have any questions about the content of this letter and/or the attachments, please contact Bryn Lindblad at blindblad@climateresolve.org / 213-634-3790 x102 or Ella Wise at ella@climateplanca.org / 510-740-9320 x320.

In the pursuit of greater mobility, equity, and sustainability; in partnership,

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Planning and Conservation League

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cc:
Susan Bransen, Executive Director, CTC
Garth Hopkins, Deputy Director - Planning, CTC
Richard Corey, Executive Officer, CARB
Ashley Georgiou, Staff Air Pollution Specialist, CARB