

The logo for ClimatePlan, featuring the word "ClimatePlan" in a bold, blue, sans-serif font.

October 18th, 2021

California Air Resources Board  
1001 I Street  
Sacramento CA 95814

Re: Comments on Proposed Mobile Source Strategy

Dear Chair Randolph, Members of the Air Resources Board, and staff,

Thank you for your leadership and commitment to reducing emissions and providing immediate benefits to communities that continue to bear the brunt of poor air quality from mobile sources. ClimatePlan is a network organization that focuses on challenges that intersect transportation planning, such as equitable mobility, land-use planning, air quality, and climate policy. We are writing in support of the strategies and recommendations to reduce Vehicle Miles Traveled (VMT) and the strategies that implement the Climate Action Plan for Transportation Infrastructure (CAPTI), in the proposed Mobile Source Strategy (MSS).

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We also want to urge the California Air Resources Board (CARB) to prioritize implementing the recommendations that increase equitable investments, increase the provision of technical assistance, ensure aggressive VMT targets result in real-world greenhouse gas (GHG) reductions, and support the electrification of transit. These recommendations are the following:

- Expand work to identify community needs, fund an array of transportation choices to meet those needs, and reduce barriers to the use of transit. (Strategy area 1 of the MSS).
- Collaboratively develop tools that help advance project selection and transportation planning to better align with climate and equity goals. (Strategy area 3 of the MSS).
- Update state planning guidance to better connect climate, transportation, conservation goals, and regional planning (Strategy area 5 of the MSS).

### Strategy Area 1

The recommendation in strategy area 1 should be one of CARB's priorities for implementation. This is because this strategy will address the transportation needs and disproportionate health burdens borne by environmental justice communities. We know through CARB's own SB 350 report that community needs are not being met through transportation planning alone. Moreover, we know environmental justice communities are also the ones who are most impacted by the negative health effects associated with vehicle emissions. Therefore, CARB should prioritize expanding their work and transportation funding programs that identify community needs, fund those needs, and reduce barriers to the use of transit. CARB should also strengthen Strategy 1 by working with the California Transportation Commission (CTC) to align funding cycles and timelines, so that these community transportation projects can be competitive for match requirements.

### Strategy Area 3

The recommendation for strategy 3 should be another one of CARB's priorities for implementation, with a high priority on supporting implementation of the California State Transportation Agency's CAPTI. This is because transportation funding does not always align with our climate goals. According to the CTC's 2019 annual report, SB 1, which contributes a lot of transportation funding, allocated 75% of its funds to highway expansion, repair, etc. According to Caltrans' *Greenhouse Gas Emissions and Mitigation Report*, travel from vehicles on California's state highway system resulted in 89 MMTCO<sub>2</sub>e. To reduce GHG emissions and meet the state's climate goals, the report also finds that transportation planning should avoid highway expansion projects, and facilitate multimodal improvements. Thus, as outlined in the MSS, CARB can partner and support in developing tools to advance transportation project selection. These tools would be accessible, transparent, and effective in reducing GHG for communities.

## Strategy Area 5

The recommendation in strategy area 5 is necessary to begin implementing reductions in VMT. Regional transportation plans and sustainable community strategies are currently the main ways that regions are able to reduce VMT and meet the state's GHG goals. However, as you know, the state is not on track to reduce VMT, and that the transportation sector continues to be the leading source of GHG emissions. One of the reasons for this is the MPO's lack of authority. Further, Heyer, Palm, and Niemeier's research (2020) finds VMT reduction benefits are not being distributed equally. MPOs, with limited funds, focus on improving existing public transportation in urban areas, but do not invest in rural communities that live near roads.<sup>1</sup> Therefore, CARB should continue coordinating with MPOs to navigate the challenges in implementing RTPs and provide best practices of intentional VMT reduction strategies.

In conclusion, we believe that MSS provides much needed guidance to reduce GHG, reduce VMT, and provides much leadership in future transportation decisions. We also would urge the board to prioritize the strategies and recommendations listed above. We look forward to continuing to work together, and we are thankful for the opportunity to comment.

Sincerely,  
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ClimatePlan

Jonathan Matz, Senior Policy Manager  
Safe Routes Partnership

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California Walks

David Diaz, MPH, Executive Director  
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<sup>1</sup> Heyer, J., Palm, M., and Niemeier, D. (2020). "Are we keeping up? Accessibility, equity and air quality in regional transportation planning." *Journal of Transport Geography*; ResearchGate.  
[https://www.researchgate.net/publication/347232166\\_Are\\_we\\_keeping\\_up\\_Accessibility\\_equity\\_and\\_air\\_quality\\_in\\_regional\\_planning](https://www.researchgate.net/publication/347232166_Are_we_keeping_up_Accessibility_equity_and_air_quality_in_regional_planning).

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