

Transportation Solutions Defense and Education Fund

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April 10, 2017
Posted to:
scopingplan2030

Mary Nichols, Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Proposed Final 2017 Scoping Plan Update: VMT Reduction

Dear Ms. Nichols:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental non-profit advocating for the regional planning of transportation, land use and air quality, with a focus on climate change. We have submitted extensive comments on the failure of the draft Updates of the Scoping Plan to seriously address VMT reduction.

The Proposed Final 2017 Scoping Plan Update¹ ("Update") won't work. It neither offers specific measures to proportionally reduce transportation's contribution of nearly half the state's GHG emissions, nor does it propose measures that are likely to be effective in doing so. While it would not be technically difficult to put together such a plan, approving it would be politically challenging. Nonetheless, wishful thinking is not a substitute for planning, especially when the purpose is to avert climate catastrophe.

We heartily agree with the statement:

In developing this Proposed Plan, time matters. The policies that are included must lead rapidly to real results to avoid the most catastrophic impacts of climate change. The Proposed Plan identifies policies based on solid science and identifies additional research needs, while also recognizing the need for flexibility in the face of a changing climate.
(Update, p. 25.)

As regards VMT reduction, however, we see that ARB has abandoned this approach, apparently as a result of political considerations. Reducing VMT will involve profound changes to the culture of this heavily auto-dependent state. This difficult work has been pushed off into the indefinite future, contrary to the policy statement cited above. This is

a violation of the public's trust in your agency, and of its statutory mandate. ARB must be a truth-teller, especially when that truth is inconvenient.

The success of the Scoping Plan Update will ride on whether ARB's goal, a 45% reduction in transportation GHG emissions (2016 Mobile Source Strategy),² can be accomplished by 2030.

The scenario assumed a 15 percent reduction in total light-duty VMT in 2050, compared to baseline 2050 levels. **This would translate into light-duty VMT growth of only five percent by 2030**, compared to current growth rates of approximately 11 percent. (*Id.*, p. 37, emphasis added.)

This statement, due to its critically important policy implications, needs to be prominently featured in the Update, with clarification as to the base year and whether this is an annual or aggregate growth rate. **This calculation should be the measure by which each of the state's efforts in the transportation sector is evaluated.**

The Update and/or its Environmental Assessment³ sorely lacks a chart listing the VMT projections of all of its various county and regional jurisdictions, along with a statewide aggregation, and comparing that to the Vision Scenario plans in the Mobile Source Strategy. (p. 36.) Numbers are needed for groundtruthing.⁴ Without actual numbers, any discussion of VMT reduction strategies will be so vague as to be meaningless.

Over the last 60 years, development patterns have led to sprawling suburban neighborhoods, a vast highway system, growth in automobile ownership, and under-prioritization of infrastructure for public transit and active transportation. Local decisions about these policies today **can** establish a more sustainable built environment for the future. (Update, p. 27, emphasis added.)

The evidence so far, however, is that, despite ARB's best efforts, local decisions favor more of the same, resulting in continued VMT growth. According to the Federal Highway Administration, California's VMT in July and August 2016 was more than 6% higher than in 2015. Without strong requirements handed down by the state, there is no reason to believe local decisions will change.

We are struck by the Update's blithe inclusion of a "15 percent reduction in total light-duty VMT in 2050." (Update, p. 105.) The 5% growth limit cited above implies a 50% reduction in VMT growth by 2030. As we have written previously, there is nothing in the "Potential State-Level Strategies"⁵ ("Strategies") paper that could achieve such an overall reduction. Here are a series of reasons why there is ZERO possibility the Strategies will achieve the desired reduction:

- The recent approval of SB 1 will provide billions of dollars for highway expansion in the guise of congestion relief. Induced demand will significantly increase VMT.

- There is no state-level leadership educating the public about the relationship between personal mobility and climate change, and inspiring Californians to consider lower-carbon lifestyles. Without this kind of leadership, the cultural change implicit in reducing VMT will be politically impossible. With leadership and education, the public may be persuaded that changes in daily driving behavior are worth making for the sake of our children and grandchildren.
- The Strategies ignore the tremendous inertia of BAU transportation policies and the powerful political influence of entrenched interests. Current transportation capital and operating funding patterns continue to focus on highways and so-called congestion relief, despite ARB-funded research pointing to the futility of such spending.⁶ The leadership in the Legislature seeks to continue the funding priorities of a pre-climate change era (SB 1). That continuation of status quo funding will fuel the growth in VMT, and starve the development of convenient alternative modes of travel that are essential to effective climate change mitigation.
- Despite all of ARB's work on climate, congestion management agencies adopting sales tax expenditure plans continue to act like they've never heard of SB 375 or climate change. The Strategies is silent on how sales taxes now make up roughly half of all transportation funding in the State, making it critical for the State to establish a legal framework where sales taxes must be consistent with State policy, focused on VMT reduction rather than "relieving congestion."
- The county where TRANSDEF is located, for example, is planning to seek a sales tax increase for transportation, based on polling residents on what they are willing to pay for. Polling will necessarily come up with answers that increase rather than reduce VMT, because residents are primarily concerned with the congestion that affects their daily lives, and don't understand the bigger picture.
- The Strategies is silent on a huge unanswered question in transportation: "When will agencies finally have to set aside their backlogs of capacity-building projects, and get with the climate change program?" Regional agencies use Committed Projects policies ("If it was in the last RTP, we don't reevaluate it--it automatically goes into the next RTP") as a means of locking in the status quo.
- In short, there is no commitment in county transportation planning to addressing the climate emergency--local agencies expect the State to do all the heavy lifting.
- The Strategies' approach to project selection is hopelessly naive: "Explore development and adoption of additional performance measures and targets to inform the selection of transportation capital projects." (Strategies, p. 2) Influence over project selection is one of the biggest political plums of elective office. Until project selection can be brought into alignment with state climate goals, VMT growth will continue to be out of control.
- Other problems with the Strategies paper are identified in TRANSDEF's September 2016 letter to ARB, attached.
- All together, these points identify the need for profound cultural change, for which ARB has yet to demonstrate an appetite.

TRANSDEF believes it is inappropriate for the VMT Reduction Strategies to be counted as "Known Commitments" (Update, p. 35) and be evaluated for their GHG emissions reduction potential, when they have yet to be adopted or even proposed. These Strategies were not part of the Project Description in the Environmental Assessment, and thus cannot be considered environmentally cleared, or part of the Update.

No state agency has yet articulated a consistent low-carbon pathway forward for transportation. TRANSDEF urges ARB to frame up a coherent policy on achieving VMT reduction, consistent with the quotations from its plans included herein, as Caltrans is not willing to do so. (A culture war is underway at Caltrans, and the BAU side is currently winning. See CTP 2040 section of attached comment letter.)

The Inherent Conflict Between Advanced Clean Vehicles and VMT Reduction

While we are enthusiastic EV supporters, we recognize that the state is challenged by two distinct transportation problems: the need for a large reduction in GHG emissions from motor vehicles, and peak-period congestion in metropolitan areas. Local transportation agencies have been focusing on clean vehicles as their primary method of reducing GHGs, as a means of avoiding their responsibilities to reduce GHGs by implementing the systemic changes called for by SB 375.

TRANSDEF supports the phasing-out of clean air vehicle access to HOV lanes, so that this critical resource may be used exclusively to promote carpool and transit vehicle use by offering a consistent travel time advantage. A focus on mode choice, rather than vehicle motive power choice, will result in a far larger amount of emissions reductions.

Our solo-driving-based transportation system cannot cope with mass numbers of travellers. Peak-period travel is inherently different from off-peak travel: by its very nature, peak-period travel is mass transportation. While EVs are an excellent and fast solution for the GHG challenge, overly focusing on them would exacerbate the congestion problem. As long as population growth means more cars, California will continue the trend of increasing VMT and increasing congestion.

Conclusion

TRANSDEF recognizes the difficulties faced by ARB in leading the charge towards low-carbon lifestyles. Now is the time to be bold and exercise leadership, especially when the incoming federal Administration denies the need for action against climate disruption. We implore the Board to direct staff to propose goals and a menu of programs that will arrest California's increasing VMT, and lead to meaningful reductions in the near-term.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President
David@Schonbrunn.org

Attachment

TRANSDEF September 2016 Comment Letter to ARB: Comments on Potential State-Level Strategies to Advance Sustainable, Equitable Communities and Reduce Vehicle Miles of Travel (VMT).

¹ Proposed Final 2017 Scoping Plan Update, ARB,
https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf (accessed 2/27/17)

² 2016 Mobile Source Strategy, ARB, p. 29,
<http://www.arb.ca.gov/planning/sip/2016sip/2016mobsrc.htm> (accessed 2/27/17)

³ Scoping Plan Draft Environmental Assessment, ARB
https://www.arb.ca.gov/cc/scopingplan/app_f_draft_environmental_analysis.pdf
(Appendix F, accessed 2/27/17)

⁴ We note, for example, our skepticism as to the 11% growth number cited above. We observe that multiple counties have recently approved transportation plans showing 28% increases in VMT by 2040.

⁵ Part of: Vibrant Communities and Landscapes and Potential VMT Measures, ARB,
https://www.arb.ca.gov/cc/scopingplan/app_c_vibrant_comm_vmt_measures.pdf
(Appendix C, accessed 2/27/17)

⁶ Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions, Susan Handy et al,
http://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf
(accessed 2/27/17)