



ECOS

ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO

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July 14, 2022

TO: California Air Resources Board
Via email sustainablecommunities@arb.ca.gov

FROM: Environmental Council of Sacramento (ECOS)
office@ecosacramento.net

SUBJECT: ECOS Comment Letter
CARB Draft 2022 Progress Report, California's Sustainable Communities and Climate Protection Act, Jun 2022

Thank you for the opportunity to comment on the CARB Draft 2022 Progress Report. We appreciate the summarized reporting of the themes across the 18 MPOs and the recommendations to overcome Sustainable Communities Strategy (SCS) implementation challenges.

Below we share our thoughts on a few of the report's recommendations that we believe are key for driving progress toward climate objectives. We also suggest additional actions for CARB's consideration.

Year of data, urgency of climate change, frequency of CARB progress reporting:

We recognize the difficulty of collecting and analyzing statewide data but nevertheless would urge the use of more current than 2019 information as a starting point for a 2022 report. The CARB 2022 report shows SB 375 2020 greenhouse gas (GHG) reduction targets for each Metropolitan Planning Organization (MPO) but not actual performance against those targets. To achieve our climate objectives, it would be helpful to have closer-to-real time information to understand what's working, what's not working, and to be able to effectively respond.

Also, we suggest that the CARB Progress Report should be published more frequently than every four years to keep the public better informed, given the urgency and severity of the climate crisis. Based on available data, the report shows slowed progress and in some cases digression from the State's climate objectives which is alarming and should be brought to the public's attention.

ECOS highlights key report recommendations:

Below we highlight actions identified in the report that we believe will be highly effective in helping regions overcome SCS implementation challenges. We would like to see these become not just "potential actions" but real actions, and where appropriate, to be required through state law.

- **Align local land use with regional plans.** We support these actions:
 - Legislature to give State and regional agencies a greater role in local land use actions
 - State and regional agencies to support local planning by expanding data sharing
 - Local agencies to establish urban growth boundaries to focus new development in existing communities

- **Accelerate infill housing production.** We support these actions:
 - Legislature to counter the high upfront cost of infill construction by expanding funding and financing tools for infill-supportive infrastructure
 - State and regional agencies to further explore actions to expand adaptive reuse of vacant commercial buildings for housing

- **Optimize the transit experience to increase transit ridership.** We support these actions:
 - Policies to make transit more affordable and more convenient
 - Require development projects to incorporate design elements that improve the transit experience

ECOS' suggestions for CARB consideration:

Below we suggest additional actions to help regions overcome SCS implementation challenges.

- **Demand-driven pricing strategies to steer consumer behavior.** Per the report, the average number of vehicles per household has increased, transit ridership in most MPOs has decreased, and both per capita GHG emissions and VMT have increased. Despite the large investments in alternate mobility infrastructure, consumer behavior is not changing rapidly enough. We suggest CARB work to establish pricing strategies to steer people away from driving and toward transit, walking, and biking. These strategies could include:
 - free public transit
 - a tax structure that penalizes individual driving mileage over some meaningful threshold, and conversely credits tax for individuals with driving mileage below some meaningful threshold
 - tax incentive structure for companies to increase the percentage of remote work hours by employees
 - higher costs for vehicle ownership by way of increased registration fees, parking fees, insurance costs, gas prices, etc.

- **More direct strategy to reduce growth in vehicle miles traveled (VMT).** We suggest CARB work to secure a greater role in local land use actions for state and regional agencies in order to focus investment and policy on re-development of existing urban areas and away from development on rural lands.

- **CARB-developed GHG emissions inventory.** We suggest CARB develop a GHG emission inventory for each jurisdiction in California to establish a complete and consistent baseline. Such an inventory might lead to more cooperation and collaboration among jurisdictions on climate action and alleviate jurisdictions' concerns of being disadvantaged economically compared with their neighbors if aggressive climate action is taken.

- **Study of the climate impact of transportation shifts** such as e-commerce, mobility as a service (e.g., Uber, Lyft), and other mobile services (e.g., DoorDash, GrubHub). We suggest CARB work to better understand the effect of these shifts in travel patterns on VMT and GHG emissions, and identify opportunities to leverage shifts that are positively aligned with climate objectives and to contain those that are not.

Conclusion

As noted above, we ask that CARB collect and analyze information that is more current, and report on SB 375 progress more frequently, so the public has a better sense of our climate status and jurisdictions can more timely make course corrections.

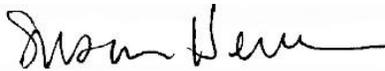
Based on the current report, we are not on a trajectory to prevent climate change. We urge CARB to work with the state legislature to implement the recommendations and suggestions above.

We seriously need to reimagine our climate strategies as if our lives depend on it, because they do. Before the COVID pandemic, public school shutdowns for an entire year, companies shutting their doors and requiring employees to work from home, virtual graduations, streaming funerals, and zoom medical appointments would have been completely unimaginable. It was not easy, but we got through it because we had to. Drastic situations call for drastic measures and regarding our climate crisis, that drastic situation is here and now. Now is the time to be bold.

Sincerely yours,



Sherry Rice
ECOS Member



Susan Herre
President of the ECOS Board of Directors