



LAW OFFICE OF
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ENVIRONMENTAL LAW



June 23rd, 2010

Doug Ito, Manager
SIP Local Government Strategies
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Mr. Ito,

Our organizations write to you out of the concern that the Santa Barbara County Association of Governments (SBCAG) is substantially miscalculating the emissions reduction potential of various SB 375 greenhouse gas emission (GHG) reduction strategies. As specified in the recommendations of the Regional Targets Advisory Committee, SBCAG should “identify the most ambitious achievable greenhouse gas emission reduction strategies for 2020 and 2035.” Our review of their analysis finds serious flaws in their data calculations and a minimum of effort and creativity to meet SB 375 obligations. In addition, they have made no effort into outreaching to community stakeholders as they developed their SB 375 plan. This is particularly significant as Santa Barbara County has historically had one of the highest per capita rates of VMT in the state and continues to experience an acute jobs-housing imbalance that exacerbates this condition. Importantly, despite initial resistance among many jurisdictions, Santa Barbara County and its cities are now investing nearly all TDA funds on transit system improvements, including dedicated transit centers in the cities of Santa Maria and Lompoc, and witnessing statistically significant increases in transit ridership throughout the region. We believe this reflects an important opportunity, however it appears SBCAG is reluctant to try to build on these results and further expand programs that can reduce VMT and GHG emissions.

SBCAG’s “Preliminary Analysis of Alternative Greenhouse Gas Emission Reduction Strategies for the SBCAG Region” finds that each of their alternative planning scenarios (TDM, Transit and Land Use, and Pricing) have the limited potential to reduced GHGs and VMT by less than 1%. The process and rationale they use to come to this conclusion is flawed and not representative of local historical trends. By using calculations from specific, limited projects rather than modeling community trends, SBCAG greatly understates GHG reduction possibilities. This is unfortunate as much progress is being made on reducing VMT in Santa

Barbara County, with SBCAG's own Traffic Solutions division implementing many innovative and successful projects. While some of our groups are submitting detailed review of their analysis, we'd like to briefly highlight the examples below.

Scenario A: TDM and TSM Alternative

- SBCAG estimates expansion of ridesharing and promotion of alternative modes of transportation would lead to a daily VMT reduction of 128,700 miles, or 1.1% of daily VMT by 2035. They list a few, discrete projects that their Traffic Solutions division is implementing. There is no analysis of community-wide mode switching to alternative modes. SBCAG's own Commute Profile Surveys in 2002 and 2007 show a decrease in single occupant driving from 80% to 71%, with vanpooling, bus riding, and telecommuting more than doubling, and carpooling increasing by 40% over these five years. Clearly travel trends indicate ridesharing and other alternative modes will produce more than a 1.1% reduction in daily VMT by 2035, particularly in light of higher fuel cost projections and shifts to ridesharing and transit incentivized by the new HOV lane on 101 and new commuter rail services.

Scenario B: Transit and Land Use Alternatives

- Land Use - SBCAG uses a 101 in Motion land use study to grossly underestimate possible effects of land use strategies. This study assumes an 80% reduction in employment growth from the 2002 Regional Growth Forecast, no new housing units built, and estimates a daily VMT reduction of 21,000. This is not the type of land use analysis expected from SB 375, which encourages infill and transit-oriented, walkable and bikeable development, rather than just artificially limiting job growth. A more relevant study is available from the City of Santa Barbara's "Plan Santa Barbara EIR" which finds under the Additional Housing Alternative (which also includes vigorous TDM and parking pricing) that total annual new VMT would decrease from 517,000,000 to 155,000,000.¹ This reduction is around 1,000,000 VMT daily, or approximately 47 times more VMT reduction than seen in the 101 in Motion study. These impressive numbers are predicted only in the City of Santa Barbara, leading us to conclude that much greater reductions could be achieved if other cities and urbanized portions of the unincorporated regions were to be similarly developed.
- Expanded Transit - SBCAG greatly underestimates the impact that long distance (regional) commuter bus services could have on reducing VMT and GHGs. One popular route, the Coastal Express, has added 20 trips in the last three years to meet existing ridership demand. SBCAG's analysis unrealistically assumes they will add only 8 more trips to this service in the next 25 years! Analysis on other inter-regional and local transit services is similarly artificially limited, with potential reductions from two newer services, the Breeze and Wine Country Express, not even included.

¹ City of Santa Barbara "Plan Santa Barbara Program EIR" page 16-66, Table 16.13: Comparison of Effects of Project Alternatives for Transportation.

- We appreciate that SBCAG has included commuter rail service in their analysis and in their most recent RTP, but, given the large and growing number of commuters from Ventura County, we feel that it may have more ridership potential than what they predict if it is done in a way that is integrated with car sharing options, transit-oriented development near the stations, and last-mile connections at the destination end.

Scenario C: Pricing and Disincentives:

- SBCAG calculates possible GHG reductions by using the draft City of Santa Barbara's General Plan conceptual parking pricing provisions to conclude that a 'moderate' policy would result in 97,700 VMT reductions daily and an 'aggressive' policy would result in 172,000 VMT reductions daily by 2035. SBCAG states that parking pricing thus has significant potential for achieving GHG reduction benefits, but says this alternative has limited applicability for Santa Barbara County due to the fact that only the City of Santa Barbara, SB City College, and UCSB charge for parking. Strangely, SBCAG leaves out potential reductions from UCSB and SB City College, even though UCSB is the largest employer in the County and SB City College is also a major employer. Additionally, there is a large flaw in logic in assuming by 2035 no other entities will charge for parking. 25 years ago, neither UCSB or SB City College charged for parking and the City of SB's parking program was extremely limited.
- One of the largest possible factors for reducing single occupant driving and VMT is increased fuel prices. The Regional Targets Advisory Committee clearly states that MPOs must use "existing and forecasted fuel prices" in their analysis. SBCAG's "business as usual" forecast makes not one reference to increased fuel prices. The EIA's Annual Energy Outlook 2010 forecasts a reference case price of \$133/barrel oil in 2035 (2008 dollars) and a high price of \$210/barrel.² Many energy experts believe the EIA's estimates to be very conservative. For example, in 2002 the EIA forecasted that 2010 prices would be around \$35/barrel, rather than the current range of \$70-\$85/barrel. Higher oil prices will dramatically affect alternative transportation rates, land use decisions, and other transportation decisions. For SBCAG to omit reference and high oil price cases in their transportation modeling is an egregious error.
- SBCAG also omits other pricing and disincentives from their analyses, such as VMT pricing, higher gas or use taxes, carbon taxes and others.

SBCAG's passive, business as usual approach suggests that there is little we can do locally to reduce VMT and that the County can do little more than wait for Pavley Regulations and the Low Carbon Fuel Standard to do all the work. The brief comments above show there is clearly much more that Santa Barbara County can do. SBCAG's recalcitrant attitude to sincere VMT and GHG reduction analysis and unwillingness to embrace the spirit of SB 375 is disappointing to Santa Barbara County residents.

² US Energy Information Administration "Annual Energy Outlook 2010 with Projections to 2035" Available at <http://www.eia.doe.gov/oiaf/aeo/woprices.html>

ARB should be aware that the Air Pollution Control District's Community Advisory Council, composed of a diverse group of air pollution stakeholders, has repeatedly and unanimously recommended that SBCAG and the APCD Boards include land use strategies in both state and federal air quality plans to address health-based air quality issues and equitable issues in air pollution control. This recommendation has been routinely rejected by these governing boards. Similarly, SBCAG was the only MPO out of 58 counties in the state to reject "no strings attached" state funds for regional land use planning. In fact, the Santa Barbara Grand Jury recently chastised SBCAG for shirking their regional land use planning responsibilities in their 2009 report "SBCAG: A Road Not Taken."³ SBCAG's Board is, at times, hostile to the types of strategies mandated by SB 375.

Furthermore, SBCAG has done nothing to notify the public and engage local stakeholders in drafting their SB 375 GHG reduction strategies. For example, no public workshops were held, and the public was not notified that the draft analysis was released – not even organizations that submitted written comments to SBCAG's 2008 RTP update. Other MPO's, such as SACOG, held public workshops on proposed draft targets. This is hardly the "bottom up, transparent" process the Regional Targets Committee recommended, where "all data, analyses and documents be available for public review at every step (steps 1-7) in the process."

In short, SBCAG has both ignored proper procedural protocols for gathering public input and comment, and manipulated the data and future scenarios to improperly conclude that virtually nothing more can be or should be done. This flies in the face of SB 375 and shortchanges Santa Barbara County's future.

The undersigned organizations ask the Air Resources Board to thoroughly scrutinize SBCAG's data and conclusions, and demand an open public process and substantive scrutiny of core assumptions and conclusions. Some individual organizations are also submitting detailed, page by page analysis of SBCAG's draft GHG Emission Reduction Strategies. We implore ARB to recognize the applicability of these concepts to Santa Barbara County and to set an appropriate GHG reduction target for Santa Barbara County, in keeping with the recommendations for "ambitious yet achievable" GHG reduction strategies.

Sincerely,

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Environmental Defense Center

Ralph Fertig, President
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