

In an effort to strengthen SB 375, we are submitting these comments regarding SBCAG's proposed plan. Our analysis below reveals many areas where SBCAG's plan substantially miscalculates emission reduction potentials of various strategies, and where additional modeling would result in a more robust plan.

Scenario A: TDM and TSM Alternative

Current trends alone indicate ridesharing and other alternative modes will produce much greater than SBCAG's projected 1.1 percent 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. SBCAG's approach to only measure trip reductions from a few discrete Traffic Solution projects severely under represents the impact increased TDM could have on increasing alternative modes.

1. 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 percent 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 switching to alternative modes. SBCAG's own Commute Profile Surveys in 2002 and 2007 show a decrease in single occupant driving from 80 percent to 71 percent, with vanpooling, bus riding, and telecommuting more than doubling, and carpooling increasing by 40 percent over these five years. Census data confirms these trends. Conversations with Traffic Solutions staff confirm that the numbers SBCAG uses are much understated, as TDM programs have ripple effects and impacts that are impossible to quantify. **Rather than listing VMT reductions from Traffic Solutions' few, discrete programs, SBCAG should model how the increase in alternative mode share affects VMT countywide.** This broader measurement will show much greater VMT reductions than the current TDM-related estimates.
2. By 2020 the new HOV lane on Highway 101 will be built. **SBCAG's model should account for increased carpooling and bus riding due to this significant new incentive.**
3. A core RTAC recommendation is to use "existing and forecasted fuel prices" to model travel trends. SBCAG's 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.¹ 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. Future fuel prices will greatly affect travelers' use of alternative modes and **SBCAG should add alternate scenarios to their analysis that model high, medium, and low fuel price signals.**

¹ US Energy Information Administration "Annual Energy Outlook 2010 with Projections to 2035" Available at <http://www.eia.doe.gov/oiaf/aeo/woprices.html>

4. SBCAG projects expanded TDM measures to result in daily VMT reductions of 128,700 VMT in 5,955 daily trips, or 21.6 miles per trip. The source of these numbers is unknown and not referenced. Our assumption is that this calculation is an average of SB County commuter's trip lengths or Commuter Challenge participants; however focusing on long distance commuters would lead to greater VMT reductions. For example, individual marketing to the 30,000 commuters that come from North County and Ventura could lead to greater VMT reductions, as Santa Maria is 63 miles away from downtown Santa Barbara, Oxnard is 40 miles, etc. **SBCAG should include a scenario that focuses on long distance commuters.**

Scenario B: Transit and Land Use Alternatives

SBCAG's land use analysis is non-existent, thus they find little they can do to achieve GHG reductions through land use changes. SBCAG should be required to do a land use analysis before their final target is approved. If this is not possible, SBCAG should be given a similar target to neighboring counties. Additionally, there are many flaws and unrealistic reasoning in their transit analysis, as described below.

1. SBCAG was the only MPO out of 58 counties in the state to reject "no strings attached" state funds for regional land use planning. As this regional planning hasn't been done, SBCAG lags other regions in capabilities to model land use scenarios. This is a main reason why SBCAG's plan lacks a substantive land use analysis, and why SBCAG projects GHG increases in all scenarios. SBCAG should not get a free pass to set their own SB 375 targets simply because they haven't done the work other regions have accomplished. **SBCAG should be required to do a land use analysis before their final target is approved.** Without proper land use planning, it is unfair to Santa Barbara County residents for ARB to allow SBCAG to set their own targets. In fact, without land use planning, a higher target should be set so to ensure that SBCAG completes land use modeling as other regions have done.
2. SB 375 provides an opportunity to address the long-standing jobs-housing imbalance in Santa Barbara County by promoting higher density, infill housing close to job centers. But instead of exploring the effect of smart growth strategies in reducing commuter traffic and VMT in the County, SBCAG uses a 101 in Motion land use study which grossly underestimate possible effects of land use strategies. This study assumes an 80 percent 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 and readily available study from the City of Santa Barbara's "Plan Santa Barbara EIR" indicates in the Additional Housing Alternative (which prioritizes workforce and employer sponsored housing in and around downtown Santa Barbara and includes vigorous TDM and parking pricing) that total annual new VMT

would decrease from 517,000,000 to 155,000,000.² 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 of Santa Barbara County were to be similarly developed. **SBCAG should use the Plan Santa Barbara EIR Additional Housing Alternative as a basis for a county-wide regional land use plan.**

3. **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 eight more trips to this service in the next 25 years. One of RTAC's core recommendations are for MPOs to draft scenarios that include increased transit use. SBCAG should analyze scenarios where commuter bus services are greatly expanded. As currently less than 1,000 of the approximately 30,000 long distance commuters (from Ventura and North County to the South Coast) use transit, there is significant market potential for increased bus ridership, especially in light of the new HOV lane on Highway 101, increased fuel prices and new premium services such as express buses with Wi-Fi. As these long distance commuters are a significant portion of Santa Barbara County's daily VMT, large reductions are possible.
4. 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. **SBCAG should model BAU, high and low ridership scenarios that look at past growth to project 2020 and 2035 ridership in different fuel price scenarios.**
5. **SBCAG doesn't include information on their baseline 2035 ridership levels. These figures should be made available to the public and MTD and other bus operators should confirm their validity.** SBCAG projects in their "expanded transit" service scenario that ridership increases from 29,121 daily boardings to 31,077 daily boardings (11,343,105 annual trips) for all bus services. This expanded transit scenario indicates an increase of 1,956 daily trips (713,940 trips per year). Considering MTD ridership alone increased from 7,004,053 to 8,104,576 between 2004 and 2008 (1,100,523 increased trips), these projected numbers for the next 25 years are extremely low.
6. North County bus services such as Santa Maria's SMAT and Lompoc's COLT are experiencing rapid growth, and new centralized transit centers in both Santa Maria and Lompoc are included in the 2008 RTP. SBCAG states that "insufficient information and project commitments exist at this time to examine how these projects will impact existing bus routes." **SBCAG's plan should include a reasonable effort to work with SMAT and COLT to project ridership levels in 2020 and 2035 under various ridership scenarios.**

² City of Santa Barbara "Plan Santa Barbara Program EIR" page 16-66, Table 16.13: Comparison of Effects of Project Alternatives for Transportation.

7. Overall, SBCAG finds their enhanced transit scenario decreases 7,184 daily VMT and 2,234 daily vehicle trips, or an average of 3.21 miles per trip. While 3.21 miles/trip may be a correct average for local services, this calculation likely excludes commuter buses. For example, the Clean Air Express currently averages 896 riders from North County. If by 2035, there are 500 additional riders from Santa Maria (130 miles round trip to Santa Barbara) there would be a reduction of 65,000 daily VMT (this is a simplified calculation, that doesn't include carpoolers, etc.). This is only one commuter service, and if it less than doubles in 25 years, it creates an order of magnitude more VMT savings. Put another way, if only 56 people switch from driving alone to riding the Clean Air Express, they will decrease daily VMT more than SBCAG's projection for all transit systems in the County! **SBCAG should include a more detailed analysis of commuter bus ridership trends.**
8. SBCAG doesn't consider the new Highway 101 HOV lanes in their projections for ridership increases for the popular VISTA commuter bus service. **The addition of the new HOV lane should be modeled.**
9. 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. **SBCAG should include a high and low ridership scenario in their analysis.**

Scenario C: Pricing and Disincentives

SBCAG only looks at one pricing example in the City of Santa Barbara and excludes parking pricing at two other sites, as well as potential pricing in other locations in Santa Barbara County. SBCAG also excludes any analysis of existing and forecasted fuel prices, VMT pricing, higher gas taxes, carbon taxes, or other scenarios requested in Step 3 of the RTAC guidelines.

1. 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. **SBCAG should include potential reductions from UCSB and SB City College.**

2. There is a large flaw in logic in assuming by 2035 no other entities will charge for parking. 25 years ago, neither UCSB nor SB City College charged for parking and the City of SB's parking program was extremely limited. UCSB is the County's largest employer and has the highest alternative mode commuting out of any large employer, partially due to their parking policies. **SBCAG should model VMT reductions associated with these parking programs by looking at past trends.**
3. 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.³ 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. **SBCAG commits an egregious error by omitting reference to high oil price cases in their transportation modeling.**
4. **As recommended by RTAC, SBCAG should also include additional pricing and disincentives in their analyses, such as VMT pricing, higher gas or use taxes, carbon taxes and others.**

Conclusion

SBCAG's "Preliminary Analysis of Alternative Greenhouse Gas Emission Reduction Strategies for the SBCAG Region" is an incomplete analysis of possible GHG reduction strategies and deceptively argues that there is little SBCAG can do to reduce transportation GHGs in Santa Barbara County. SBCAG forecasts an increase in GHGs in every scenario, while almost every other MPO created scenarios that reduced per capita GHG's by 10-20 percent by 2035.

Experience from other MPOs as well as our analysis of SBCAG's plan suggest that much more work is needed for SBCAG to develop a plan that doesn't shortchange the future of Santa Barbara County. 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

³ US Energy Information Administration "Annual Energy Outlook 2010 with Projections to 2035" Available at <http://www.eia.doe.gov/oiaf/aeo/woprices.html>

their 2009 report “SBCAG: A Road Not Taken.” SBCAG’s Board is, at times, hostile to the types of strategies mandated by SB 375.

We ask that ARB thoroughly scrutinize SBCAG’s data and conclusions, and require that SBCAG undertake an open public process including a substantive scrutiny of core assumptions and conclusions. 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. We recommend that if SBCAG is unable to produce substantive new analysis, Santa Barbara County should be given a similar target to Ventura County, as our regions have similar demographics and characteristics.

Sincerely,



Dave Davis, Executive Director



Michael Chiacos, Transportation Specialist