Responses to Comments

on the

Draft Environmental Analysis
Prepared for the

Proposed Update to the SB 375 GHG Emissions Reduction Targets

California Air Resources Board
1001 I Street
Sacramento, California, 95814

Released March 09, 2018
to be considered at the
March 22, 2018 Board Hearing
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PREFACE

The California Air Resources Board (CARB) released a Draft Environmental Analysis (Draft EA) for the Proposed Update to the SB 375 GHG Emissions Reduction Targets (Target Update) on June 13, 2017, for a 45-day public review and comment period that concluded July 28, 2017. During the public comment period for the Target Update, 36 comment letters were received. Four additional letters were received after the close of the comment period resulting in a total of 40 comment letters received on the Target Update, ten of which were determined to raise significant environmental issues related to the analysis in the Draft EA and are responded to in this document.

CARB staff made modifications to the Draft EA to create the Final EA. To facilitate identifying modifications to the document, modified text is presented in the Final EA with strike-through for deletions and underline for additions. Based on stakeholder input received, the proposed project has been modified to represent a hybrid of the originally-proposed project and Alternative 3 from the Draft EA. None of the modifications alter any of the types of foreseeable compliance responses evaluated or conclusions reached in the Draft EA, introduce new significant effects on the environment, or provide new information of substantial importance relative to the EA. As a result, these revisions do not require recirculation of the draft document pursuant to the California Environmental Quality Act (CEQA) Guidelines, California Code of Regulations, title 14, section 15088.5, before consideration by the Board.
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1. INTRODUCTION

The California Air Resources Board (CARB) released a Draft Environmental Analysis (EA) for the Proposed Update to the SB 375 GHG Emissions Reduction Targets (Target Update) on June 13, 2017 for a 45-day public review and comment period that concluded July 28, 2017. CARB received numerous comment letters through the comment docket opened for the Target Update, including the Draft EA, during that time. All of the comment letters are available for viewing on the comment docket on the CARB website at: https://www.arb.ca.gov/lispub/comm/bccommlog.php?listname=sb375update2017

CARB staff carefully reviewed all comment letters received to determine which ones raised significant environmental issues related to the analysis in the Draft EA and require a written response under CARB’s certified regulatory program implementing the California Environmental Quality Act (CEQA). This document includes CARB staff’s written responses to that subset of comments, and will be provided to the Board for consideration prior to it taking final action on the Target Update.

The written responses include a brief summary of each comment, followed by the written response. The full comment letters, from which the comments responded to were extracted, are provided in Attachment A of this document. Although this document includes written responses only to those comments related to the Draft EA, all comment letters received were considered by staff and provided to the Board members for their consideration.

Following consideration of the comments received on the Draft EA and during the preparation of the responses to those comments, CARB revised the Draft EA to prepare the Final EA, which was released March 09, 2018, as Appendix F to the final version of the Target Update staff report.

1.1. Requirements for Responses to Comments

These written responses to public comments on the Draft EA are prepared in accordance with CARB’s certified regulatory program to comply with CEQA. CARB’s certified regulations states:

California Code of Regulations, title 17 section 60007. Response to Environmental Assessment

(a) If comments are received during the evaluation process which raise significant environmental issues associated with the proposed action, the staff shall summarize and respond to the comments either orally or in a supplemental written report. Prior to taking final action on any proposal for which significant environmental issues have been raised, the decision maker shall approve a written response to each such issue.

Public Resources Code section 21091 also provides guidance on reviewing and responding to public comments in compliance with CEQA. While this section refers to
environmental impact reports, proposed negative declarations, and mitigated negative declarations, rather than an EA, it contains useful guidance for preparing a thorough and meaningful response to comments.

Public Resources Code section 21091, subdivision (d) states:

(1) The lead agency shall consider comments it receives if those comments are received within the public review period.

(2) (A) With respect to the consideration of comments received, the lead agency shall evaluate any comments on environmental issues that are received from persons who have reviewed the draft and shall prepare a written response pursuant to subparagraph (B). The lead agency may also respond to comments that are received after the close of the public review period.

(B) The written response shall describe the disposition of each significant environmental issue that is raised by commenters. The responses shall be prepared consistent with section 15088 of Title 14 of the California Code of Regulations.

California Code of Regulations, title 14, section 15088 (CEQA Guidelines) also includes useful information and guidance for preparing a thorough and meaningful response to comments. It states, in relevant part, that specific comments and suggestions about the environmental analysis that are at variance from the lead agency’s position must be addressed in detail with reasons why specific comments and suggestions were not accepted. Responses must reflect a good faith, reasoned analysis of the comments.

California Code of Regulations, title 14, section 15088 (a – c) states:

(a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.

(b) The lead agency shall provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.

(c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the Lead Agency’s position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.
1.2. Comments Requiring Substantive Responses

CARB is required to prepare written responses only to those comments that raise “significant environmental issues” associated with the proposed action, as outlined in California Code of Regulations, title 17, section 60007(a). A total of 35 comment letters were submitted to the comment docket set up for the Target Update and its appendices, including the Draft EA, and five additional comment letters were received late after the close of the docket. Out of the 40 comments received, ten comment letters were determined to include comments raising significant environmental issues related to the Draft EA and requiring a written response under CARB’s certified regulatory program and CEQA. CARB staff was conservative and inclusive in determining which comments warranted a written response and even included comments that did not mention the Draft EA, but did raise an issue related to potential adverse impacts related to the Target Update.

Below is a list of all the comment letters that were received but not responded to in this document (Table 1-1). These comment letters were considered by CARB staff and provided to the Board members for their consideration. Responses are not provided to these comments in this document because CARB staff determined they do not raise significant environmental issues related to the Draft EA and do not require a response under CARB’s certified regulatory program and CEQA. Furthermore, the Target Update is not subject to the requirements of the Administrative Procedures Act to prepare a Final Statement of Reasons with written responses to each issue, and there is no requirement in the Health and Safety Code, Assembly Bill (AB) 32, Senate Bill (SB) 32, or any other statute governing the preparation of the Target Update that requires CARB to prepare written responses to each issue raised related to the Target Update. Nonetheless, these comments are part of the record, were taken into consideration when CARB staff prepared the final Target Update, and were provided to Board members for their full consideration before taking action on the Target Update.

<table>
<thead>
<tr>
<th>Comment Number</th>
<th>Date</th>
<th>Name</th>
<th>Affiliation</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>July 11, 2017</td>
<td>Zorn, Lisa</td>
<td>MTC</td>
</tr>
<tr>
<td>4</td>
<td>July 24, 2017</td>
<td>Niblock, Ryan</td>
<td>San Joaquin Valley Regional Planning Agencies’ Directors’ Committee</td>
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<tr>
<td>5</td>
<td>July 27, 2017</td>
<td>Corless, James</td>
<td>SACOG</td>
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<tr>
<td>6</td>
<td>July 27, 2017</td>
<td>Chang, Ping</td>
<td>SCAG</td>
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<tr>
<td>8</td>
<td>July 27, 2017</td>
<td>Jacobs, Bill</td>
<td>City of Irvine</td>
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<td>9</td>
<td>July 27, 2017</td>
<td>DeCarli, Ronald</td>
<td>SLOCOG</td>
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<td>10</td>
<td>July 28, 2017</td>
<td>Lister, Elaine</td>
<td>City of Mission Viejo</td>
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<td>11</td>
<td>July 28, 2017</td>
<td>Pittenger, Patrick</td>
<td>MCAG</td>
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<td>Comment Number</td>
<td>Date</td>
<td>Name</td>
<td>Affiliation</td>
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<td>-----------------------</td>
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<td>13</td>
<td>July 28, 2017</td>
<td>Delaney, Tracy</td>
<td>Public Health Alliance of Southern CA</td>
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<tr>
<td>15</td>
<td>July 28, 2017</td>
<td>Lyon, Richard</td>
<td>California Building Industry Association; California Chamber of Commerce; California Business Properties Association; California Business Roundtable</td>
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<tr>
<td>16</td>
<td>July 28, 2017</td>
<td>Rosenberger Haider, Laura</td>
<td>Private Citizen</td>
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<td>17</td>
<td>July 28, 2017</td>
<td>Wright, Molly</td>
<td>SMAQMD</td>
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<tr>
<td>18</td>
<td>July 28, 2017</td>
<td>Zorn, Lisa</td>
<td>MTC</td>
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<td>19</td>
<td>July 28, 2017</td>
<td>Higgins, Bill</td>
<td>CALCOG</td>
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<td>20</td>
<td>July 28, 2017</td>
<td>Ortiz, Nicholas</td>
<td>Greater Bakersfield Chamber of Commerce</td>
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<td>21</td>
<td>July 28, 2017</td>
<td>Dominie, Will</td>
<td>Bay Area Regional Health Inequities Initiative</td>
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<td>22</td>
<td>July 28, 2017</td>
<td>Trom, Philip</td>
<td>SANDAG</td>
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<td>23</td>
<td>July 28, 2017</td>
<td>Lindblad, Bryn</td>
<td>Climate Resolve</td>
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<td>24</td>
<td>July 28, 2017</td>
<td>Chesley, Andrew</td>
<td>SJCOG</td>
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<tr>
<td>25</td>
<td>July 28, 2017</td>
<td>Williams, Matt</td>
<td>Sierra Club</td>
</tr>
<tr>
<td>26</td>
<td>July 28, 2017</td>
<td>Rodriguez-Adjunta, Carolina</td>
<td>Climate Action Campaign</td>
</tr>
<tr>
<td>27</td>
<td>July 28, 2017</td>
<td>Daryanani, Nikita</td>
<td>Leadership Counsel for Justice and Accountability; Central California Asthma Collaborative; Safe Routes to School National Partnership; Central Valley Air Quality Coalition; Center on Race, Poverty, &amp; the Environment; Sequoia Riverlands Trust; Roman Catholic Diocese of Fresno</td>
</tr>
</tbody>
</table>
### Table 1-1: List of Comment Letters Requiring No Further Response

<table>
<thead>
<tr>
<th>Comment Number</th>
<th>Date</th>
<th>Name</th>
<th>Affiliation</th>
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<tr>
<td>28</td>
<td>July 28, 2017</td>
<td>Escarcega, Christopher</td>
<td>ClimatePlan</td>
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<tr>
<td>29</td>
<td>July 28, 2017</td>
<td>Fletcher, Chanell</td>
<td>ClimatePlan</td>
</tr>
<tr>
<td>30</td>
<td>July 28, 2017</td>
<td>Leal-Gutierrez, Patricia</td>
<td>Leadership Counsel for Justice and Accountability; The Greenfield Walking Group; Kern County Black Chamber of Commerce; Bike Bakersfield; City of Arvin; Dolores Huerta Foundation</td>
</tr>
<tr>
<td>31</td>
<td>July 28, 2017</td>
<td>Fletcher, Chanell</td>
<td>ClimatePlan</td>
</tr>
<tr>
<td>32</td>
<td>July 28, 2017</td>
<td>Fletcher, Chanell</td>
<td>ClimatePlan</td>
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<td>35</td>
<td>July 31, 2017</td>
<td>Howard, Andrea</td>
<td>Western Riverside Council of Governments</td>
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<tr>
<td>36</td>
<td>August 7, 2017</td>
<td>Rodriguez-Adjunta, Carolina</td>
<td>Climate Action Campaign; Cleveland National Forest Foundation; Environmental Center San Diego; IBEW Local Union 569; Southwest Wetlands Interpretive Association; San Diego 350; Bike San Diego; Preserve Calavera Coastal North San Diego County; Environmental Health Coalition; and Climate Reality Leadership Corps, Doctors for Climate Health</td>
</tr>
<tr>
<td>39</td>
<td>December 22, 2017</td>
<td>Schonbrunn, David</td>
<td>TRANSDEF</td>
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2. RESPONSES TO COMMENTS

The comment letters responded to in this document were coded by the order in which they were received. Table 2-1 provides the list of comment letters that contain substantive environmental comments. Responses to these comments are provided below. Comment letters, bracketed to indicate individual comments, are provided in Attachment A.

<table>
<thead>
<tr>
<th>Comment Number</th>
<th>Date</th>
<th>Name</th>
<th>Affiliation</th>
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<tbody>
<tr>
<td>1</td>
<td>July 7, 2017</td>
<td>Schonbrunn, David</td>
<td>TRANSDEF</td>
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<tr>
<td>3</td>
<td>July 21, 2017</td>
<td>Ball, Rob</td>
<td>Kern Council of Governments</td>
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<tr>
<td>7</td>
<td>July 27, 2017</td>
<td>Vazifdar, Kawsar</td>
<td>LA County Public Works Task Force</td>
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<tr>
<td>12</td>
<td>July 28, 2017</td>
<td>Johnson, Darrell</td>
<td>OCTA</td>
</tr>
<tr>
<td>14</td>
<td>July 28, 2017</td>
<td>Schonbrunn, David</td>
<td>TRANSDEF</td>
</tr>
<tr>
<td>33</td>
<td>July 28, 2017</td>
<td>Williams, Matt</td>
<td>Sierra Club</td>
</tr>
<tr>
<td>34</td>
<td>July 28, 2017</td>
<td>Rosenberger Haider, Laura</td>
<td>Private Citizen</td>
</tr>
<tr>
<td>37</td>
<td>October 13, 2017</td>
<td>Tanner, David</td>
<td>Environmental &amp; Regulatory Specialists, Inc.</td>
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<tr>
<td>38</td>
<td>October 24, 2017</td>
<td>Tanner, David</td>
<td>Environmental &amp; Regulatory Specialists, Inc.</td>
</tr>
<tr>
<td>40</td>
<td>February 8, 2018</td>
<td>Garrett, Christopher W.</td>
<td>Latham &amp; Watkins LLP</td>
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</tbody>
</table>

The following two Master Responses address recurring themes within the comments listed in Table 2-1. These Master Responses are referenced within the individual responses, where applicable.

**Master Response 1:**

**Comment:**

The Proposed Senate Bill (SB) 375 Targets would not achieve the full amount of greenhouse gas (GHG) emissions reductions necessary from the transportation sector called for in the Proposed 2030 Scoping Plan to achieve the statewide GHG emissions reductions required by SB 32.
Response:

This comment suggests that more GHG emissions reductions should be achieved to meet SB 32 goals, which is a different issue than identifying any significant adverse impacts caused by the proposed project. A CEQA analysis must identify and focus on the “significant environmental effects” of the proposed project. (Pub. Resources Code § 21100(b)(1); 14 CCR § 15126(a), 15143.) A significant effect on the environment is defined as “a substantial, or potentially substantial, adverse change in the environment.” (Pub. Resources Code § 21068 [italics added].) By contrast, an action that merely foregoes some hypothetical benefits does not constitute an impact under CEQA if it would not result in an adverse change or increase above the environmental baseline. Therefore, this comment does not raise any significant adverse environmental impacts of the proposed project.

Nonetheless, staff provide the following response to this comment:

As discussed on page 9 of the Draft Staff Report (https://www.arb.ca.gov/cc/sb375/staff_report_sb375_target_update_june.pdf), CARB is updating the Scoping Plan to reflect the new statewide GHG emissions reduction goal for 2030 called for in SB 32. The most recent draft version of the Scoping Plan Update discusses emissions reductions from the transportation sector as a whole, and recommends strengthened SB 375 targets—the target of this project—as a measure to achieve greater GHG emissions reductions than would occur under currently adopted Sustainable Communities Strategies (SCSs). At the same time, the draft plan recognizes that updating the SB 375 targets is only one of many measures the State must implement to meet its transportation sector goals. The Final Proposed 2030 Scoping Plan is still under development by CARB and will recommend a reduction of vehicle miles traveled (VMT) that is to be achieved at least in part by increasing the stringency of the regional per capita GHG targets for SCSs. Other recommended strategies for emissions reductions from the transportation sector include, for example, increasing the availability and deployment of renewable fuels, and improved vehicle efficiency and technologies.

Furthermore, simply raising the SB 375 targets to match any potential shortfall in the Scoping Plan will not necessarily yield the intended VMT or GHG emissions reductions. This is because an SCS must be financially constrained and adopted as part of a Metropolitan Planning Organization’s (MPO’s) Regional Transportation Plan (RTP), yet the authority to implement land use decisions remains with local jurisdictions—the cities and counties. If an MPO were unable to achieve its targets with currently available financial resources, it would be required to prepare an Alternative Planning Strategy (APS) that describes the additional funding, and/or alternative policy, infrastructure, and development patterns necessary to achieve the targets. CARB faces the possibility that if the SB 375 targets are too difficult to achieve, MPOs would be forced to prepare APSs instead of SCSs. An APS would likely represent less concrete
implementation commitments and as such could be less likely to result in the implementation of any additional VMT or GHG emissions reduction strategies.

Since the time the Draft EA and Draft Staff Report were published, CARB finalized and adopted the Scoping Plan Update on December 14, 2017. The adopted Scoping Plan Update views the SB 375 targets as one measure to achieve GHG emissions reductions from the transportation sector, but also relies on deployment of renewable fuels, improved vehicle efficiency and technology, and additional VMT reduction strategies initiated by State agencies.

See also, pages E-153 and E-154 of the Draft EA, regarding discussion of Alternative 4 (Substantially More Stringent Targets Alternative). This alternative analyses the impacts of setting substantially more stringent targets.

Master Response 2:

Comment:
Total VMT in California is expected to increase through 2035 and beyond. How can we meet our climate goals if VMT continues to go up?

Response:
This comment suggests total VMT should be decreasing rather than increasing. To clarify from the outset, the proposed project would not increase total VMT beyond levels that would exist in the absence of the proposed project. Under the proposed SB 375 targets, the per capita rate of VMT would be lower than under existing conditions. A CEQA analysis must identify and focus on the “significant environmental effects” of the proposed project. (Pub. Resources Code § 21100(b)(1); 14 CCR § 15126(a), 15143.) A significant effect on the environment is defined as “a substantial, or potentially substantial, adverse change in the environment.” (Pub. Resources Code § 21068.) By contrast, an action that merely foregoes some hypothetical benefits does not constitute an impact under CEQA if it would not result in an adverse change or increase above the environmental baseline. As explained in the EA, implementation of RTP/SCSs developed pursuant to the Target Update would not generate additional growth beyond baseline projections. Therefore, this comment does not raise any significant adverse environmental impacts of the proposed project.

Nonetheless, staff provide the following response to this comment:

Neither Assembly Bill (AB) 32 nor SB 32 intended to limit population growth within California. VMT is forecast to increase with population growth in the future, but is expected to increase less than historical trends. Under the proposed SB 375 targets, the per capita rate of light-duty VMT and associated GHG emissions growth would be lower than under existing conditions. For this reason, the proposed project would have a beneficial impact on GHG emissions.
When the proposed SB 375 targets are taken together with the other proposed measures applicable to the transportation sector (e.g., vehicle efficiency, technology, and renewable fuels measures) outlined in CARB’s Final 2017 Scoping Plan Update (https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf) and in the Mobile Source Strategy (https://www.arb.ca.gov/planning/sip/2016sip/2016mobsrc.pdf) total GHG emissions from the transportation sector are forecast to decrease on the trajectory needed to meet the GHG reduction mandates in AB 32 and SB 32.

CARB includes several GHG reduction measures in the transportation and fuels sector in the 2017 Scoping Plan Update to achieve the reductions necessary to meet the State’s 2030 target. These reductions are summarized in Table 1 (Scoping Plan Scenario) under the Mobile Source Strategy (Clean Technology and Fuels Scenario), the highlights of which include 1.5 million ZEVs by 2030, Medium- and Heavy-Duty GHG Phase 2 Regulations, Advanced Clean Transit, Last-Mile Delivery, and a number of VMT reductions achieved not just by SB 375 compliance, but also through SB 743 implementation (infill development streamlining and CEQA changes), and additional measures not included in the Mobile Source Strategy. Additionally, Table 1 in the Scoping Plan Update includes updates to the Low-Carbon Fuel Standard to achieve an 18 percent reduction in the carbon intensity of fuels by 2030.
1-1: The comment raises concerns about where additional transportation sector-related GHG emissions reductions called for in the Scoping Plan will come from, if not from SB 375.

Response: See Master Response 1.

1-2: The comment raises concerns that VMT and drive-alone trips are projected to increase in the Metropolitan Transportation Commission (MTC) region, and in other MPO regions.

Response: See Master Response 2. Regarding the commenter’s specific concerns with performance of drive-alone trips in MTC’s most recent RTP/SCS, CARB staff will consider this as we move forward with a separate evaluation of the Bay Area’s 2040 RTP/SCS under SB 375. In addition, the proposed project would assign all MPOs, including MTC, more stringent SB 375 targets compared with their existing targets, which is expected to incentivize MPOs to continue to deploy strategies that reduce passenger VMT.

1-3: The comment indicates that there are additional land use strategies that MPOs are not willing to adopt to achieve greater GHG emissions reductions (but does not provide specific examples).

Response: The comment is noted and is being provided to the Board members for their consideration, but no further response to this comment is required. A CEQA analysis must identify and focus on the “significant environmental effects” of the proposed project. (Pub. Resources Code § 21100(b)(1); 14 CCR § 15126(a), 15143.) A significant effect on the environment is defined as “a substantial, or potentially substantial, adverse change in the environment.” (Pub. Resources Code § 21068 [italics added].) By contrast, an action that merely foregoes some hypothetical benefits does not constitute an impact under CEQA if it would not result in an adverse change or increase above the environmental baseline. Therefore, this comment does not raise any significant adverse environmental impacts of the proposed project.

1-4: The comment states that demonstrating a reduction in total regional transportation-related GHG emissions is mandatory under SB 375.

Response: See Master Response 2.

1-5: The comment states that the 2010 per capita GHG emissions reduction targets resulted in an overall increase in GHG emissions.

Response: This comment is not specifically directed towards the analysis of GHG emissions associated with the Target Update or the Draft EA, as the 2010 per capita targets are not part of this rulemaking. The effects of the 2010 per capita targets were
addressed in the functional equivalent document (FED) already approved by CARB at the time the 2010 targets were adopted. The Draft EA for the Proposed Target Update does not need to re-analyze the effects of the 2010 per capita targets, but rather is focused on the potential of the Target Update (the proposed project) to cause a significant effect on the environment.

Staff has found no evidence that the 2010 per capita targets directly “resulted in” or caused a net increase in GHG emissions. Furthermore, any net increases in GHG emissions that may have occurred since 2010 despite compliance of MPOs with per capita GHG emissions reduction targets in adopted RTP/SCS within a given region would not be attributable to the targets themselves. MPOs have provided CARB with analyses of RTP/SCSs adopted since the passage of SB 375 compared with RTPs prepared prior to SB 375, and those analyses show that 2020 and 2035 VMT and GHG emissions would be higher under the business-as-usual RTP scenarios than under the SCS scenarios. This gives CARB staff the indication that the presence of SB 375 and associated targets have resulted in a trend toward lower VMT and GHG emissions from RTPs. In addition, see Master Response 2.

1-6: The comment questions why the objectives do not include reducing total regional transportation-related GHG emissions and queried whether this omission causes the objectives to fail to comply with AB 32 and SB 375.

Response: See Master Response 2. Neither the existing targets, nor the proposed Target Update, are solely responsible for achieving the total transportation sector emissions reductions needed to comply with AB 32 and SB 32. The discussion of statutory requirements in SB 375 on page 3 of the draft staff report explains that “CARB must consider changes in GHG emissions reductions resulting from improved vehicle emission standards, changes in fuel consumption, and other measures that will reduce GHG emissions as part of the target update process.” Thus, the Target Update objectives stated in the staff report reflect the need to achieve greater reductions than existing targets, while also accounting for other GHG reduction measures in the transportation sector that will complement those achieved by the Target Update. As proposed, CARB staff’s proposed targets would result in an additional reduction of GHG emissions of approximately 8 million metric tons (MMT) of CO₂ per year in 2035 compared to the current targets, and an estimated 1.5 MMT CO₂ per year additional reduction in 2035 compared to existing adopted SCSs.

1-7: The comment states that the MPOs base their analyses of their RTPs on obsolete travel demand models that do not properly account for induced demand from expanding highway capacity.

Response: See page D-15 of the Draft Staff Report on MPO modeling capabilities. This section acknowledges that transportation modeling tools do not fully capture the induced growth or latent demand from building new roadway capacity. Improving travel demand models takes place incrementally over time and requires substantial investment and time by MPOs. CARB staff evaluates MPO travel modeling tools to
make sure they are reasonably sensitive and properly calibrated, and recommends that travel forecasting models be modified over time to better account for these factors.

The remainder of the comment letter does not raise significant environmental issues related to the Draft EA. The comments are noted and are being provided to the Board members for their consideration, but no further response to this letter is required.
3-1: The comment identifies the Draft EA within the subject line of the comment letter.

**Response:** Neither the comment nor the remainder of the comment letter addresses the adequacy, accuracy, or completeness of the Draft EA and no changes to the Draft EA are required in response to this comment. The comments are noted and are being provided to the Board members for their consideration, but no further response to this letter is required.
Comment Letter 7  
7/27/2017  
Vazifdar, Kawsar  
LA County Public Works Task Force

**7-1:** The comment identifies the Draft EA within the subject line of the comment letter.

**Response:** Neither the comment nor the remainder of the comment letter addresses the adequacy, accuracy, or completeness of the Draft EA and no changes to the Draft EA are required in response to this comment. The comments are noted and are being provided to the Board members for their consideration, but no further response to this letter is required.
12-1: The comment identifies the Draft EA within the subject line of the comment letter.

Response: Neither the comment nor the remainder of the comment letter addresses the adequacy, accuracy, or completeness of the Draft EA and no changes to the Draft EA are required in response to this comment. The comments are noted and are being provided to the Board members for their consideration, but no further response to this letter is required.
14-1: The comment states that the EA should acknowledge international trends in vehicle use.

Response: The commenter notes that other jurisdictions have also taken aggressive action to reduce GHG emissions and VMT. While those other jurisdictions’ efforts in this regard are commendable, California operates under a completely different legal framework. In this jurisdiction, California’s legislature has enacted SB 375, along with other laws, to achieve the needed reductions in VMT and GHGs. Contrary to commenter’s assertions, CARB’s proposed targets do satisfy the SB 375 statutory requirements. (See Master Responses 1 and 2 above.) The emissions analysis in the Draft EA relied upon CARB’s latest-approved version of the Mobile Source Emission Factor Model (EMFAC 2014), which reflects the best available current and future information on fleet composition and turn-over, vehicle regulations, and fuel use forecasts for California. CARB believes this is the appropriate method to characterize the emissions from the proposed project.

See also Master Response 1, above, to the extent this comment suggests more GHG reductions should be achieved.

14-2: The comment indicates a belief that the proposed targets would not achieve the State’s GHG emissions reduction mandates.

Response: See Master Response 2.

14-3, 14-4: The comment raises concerns that CARB has accepted Business-as-Usual assumptions from the MPOs in its proposal, and that MPOs are not making a good-faith effort at GHG emissions reductions.

Response: This comment does not cite to a specific concern regarding the adequacy, accuracy, or completeness of the Draft EA. Each MPO conducted analysis of additional SCS strategies (i.e., “stress tests”) that could hypothetically yield GHG emissions reductions above and beyond the current SCSs, if these additional strategies were implemented. This analysis was documented in Appendix B to the Draft Staff Report (https://www.arb.ca.gov/cc/sb375/staff_report_sb375_target_update_june.pdf). See also Master Response 1.

14-5: The comment states that MTC’s recently-approved 2017 RTP SCS EIR shows no signs of VMT reduction.

Response: This comment references MTC’s document and does not cite to a specific concern regarding the adequacy, accuracy, or completeness of the Draft EA or raise any environmental issues related to this project. Therefore, no changes to the Draft EA are required in response to this comment. The comment is noted and will be provided to the Board members for their consideration, but no further response to this comment is required.
14-6: The comment states that MTC’s recently-approved 2017 RTP SCS EIR shows that mode share remains static despite growth, meaning that the SCS would have no beneficial effect regarding VMT or GHG emissions.

Response: This comment references MTC’s document and does not cite to a specific concern regarding the adequacy, accuracy, or completeness of the Draft EA or raise any environmental issues related to this project. Therefore, no changes to the Draft EA are required in response to this comment. As discussed in Response 1-2, the proposed project would assign all MPOs, including MTC, more stringent SB 375 targets compared with their existing targets, which is expected to incentivize MPOs to continue to deploy strategies that reduce passenger VMT. The comment is noted and will be provided to the Board members for their consideration, but no further response to this comment is required.

14-7: The comment raises concerns that CARB should not advocate for more funding for the MPOs because they will continue to spend it on building and maintaining roadways.

Response: Approval of project-level funding by MPOs is beyond the scope of CARB’s SB 375 target-setting Project. Certain types of funding the MPOs receive can only be spent on building and maintaining roadways. In the Draft Staff Report, CARB advocates for more flexible funding that can be used to implement the types of SCS strategies explored by the MPOs in their stress tests, but for which they do not currently have enough eligible funding sources.

14-8: The comment states that giving communities lower targets allows them to shirk their responsibility for adding GHG emissions to the global impact of climate change.

Response: The reference in this comment to “lower targets” is interpreted to mean less aggressive targets. See Master Response 1. In addition, the SB 375 targets apply to only a portion of GHG emissions subject to a local jurisdiction’s purview. Individual jurisdictions have the authority and responsibility to reduce GHG emissions from all sources under their jurisdiction (not just from passenger vehicles) through their own planning efforts and discretionary actions subject to the California Environmental Quality Act (CEQA).

14-9: The comment claims that the State enables MPOs to continue to build roadway capacity for solo drivers and this is one of the main reasons VMT and associated GHG emissions continue to increase.


14-10: The comment recommends deleting managed freeway lanes (e.g., high-occupancy vehicle [HOV] and toll lanes) from the list of compliance responses for future RTP/SCS updates. The commenter asserts that shifting all funding away from building roadway capacity to transit would make higher targets feasible.
Response: The reference in this comment to “higher targets” is interpreted to mean more aggressive targets. See Response 14-7 and Master Response 1. In addition, continued and expanded planning for managed roadway lanes is a reasonably foreseeable compliance response associated with the Target Update. Managed lanes are one of many SCS strategies because they incentivize carpooling and disincentivize single occupancy vehicle travel. As discussed on page E-29 of the Draft Staff Report, managed lanes for HOVs would provide incentives to automobile users to engage in ride sharing programs as HOV-only lanes would allow users to circumvent traffic during peak hours, and reduce users’ travel time. In addition, as discussed on page E-30 of the Draft Staff Report, pricing strategies such as high-occupancy tolling (HOT) and congestion pricing are known to reduce congestion, VMT, and associated GHG emissions in urban areas.¹

14-11: The comment states that the scope of the Draft EA’s environmental analysis is inadequate because it focuses only on the Project’s reasonably foreseeable compliance responses. The comment further states that the Draft EA fails to evaluate overall compliance with SB 375, SB 32, the Executive Orders, the Scoping Plan (2014 or 2017), or any other components of the Regulatory Setting identified in Table 10 (page E-199) of the Draft EA.

Response: CEQA requires analysis of a project’s reasonably foreseeable direct and indirect environmental impacts. The compliance responses are the activities associated with the proposed project that could foreseeably have environmental impacts. Chapter 4 of the Draft EA therefore analyzes all reasonably foreseeable direct and indirect impacts of the proposed project. The approach to evaluation of the project as a whole, including reasonably foreseeable compliance responses to the Target Update, is adequate for programmatic analysis and is explained in detail in the project description in Chapter 2 of the Draft EA.

Impact 8-2 in Chapter 4 of the Draft EA analyzes the long-term effects of GHG emissions reductions associated with the Target Update and associated compliance responses, and includes the effect of statewide compliance across all 18 MPOs with the Target Update, in combination with other existing and proposed GHG reduction measures in the transportation sector. Existing SB 375 targets are already part of the statewide strategy and suite of transportation sector measures included in the 2014 Scoping Plan Update to achieve AB 32 targets. Similarly, Impact 8-2 includes a discussion of the role of the Target Update as one of several transportation sector measures in the 2017 Scoping Plan Update scenario designed to meet the statewide SB 32 target. Furthermore, Page 71 of the Final EA states that the Target Update would result in an additional GHG reduction of approximately 8 MMT CO₂ by 2035 compared to the existing targets. This estimate has been revised from the Draft EA, which estimated that the originally proposed project would, if implemented, result in an additional GHG emissions reduction of approximately 10 MMT CO₂ by 2035 compared to the existing targets. For reasons described on pages 7-10 of the Final EA, CARB

¹ https://www.arb.ca.gov/cc/sb375/policies/pricing/road_pricing_brief.pdf
staff has proposed to modify the proposed project to more closely align with the project objectives. CARB staff believes the original estimate of 10 MMT CO₂ by 2035 compared to the existing targets was an over-estimate of the foreseeable GHG emissions reductions from the originally proposed targets, and that approximately 8 MMT CO₂ by 2035 is more reasonable. The revisions to the proposed project and the associated foreseeable compliance responses would still result in an overall net GHG emissions reduction compared to the existing baseline, and long-term GHG emissions impacts would still be beneficial. The proposed project is estimated to achieve an additional GHG emission reduction of 1.5 MMT CO₂ per year in 2035 compared to the existing adopted SCSs.

See also Response to Comments 1-4, 1-5, and 1-6 with respect to the project objectives, including how the Target Update complies with SB 375 and further discussion of the approach to transportation sector reductions included in the 2017 Scoping Plan Update to meet the 2030 target under SB 32.

14-12: The comment states that the Draft EA failed to quantify overall state-wide GHG emissions from cars and light trucks, resulting in a lack of analysis necessary for the Board to make an informed decision regarding the Target Update. The comment also notes that the Draft EA does not disclose whether the Target Update would result in significant additional GHG reductions from changed land use patterns and improved transportation.

Response: Regarding the concern about lack of analysis, see response to comment 14-11 regarding the additional GHG reductions that would be achieved from the Target Update, in combination with other transportation measures in the 2017 Scoping Plan Update.

See also Master Response 1, regarding the distinction between forgoing potential additional benefits and actual environmental impacts regarding CEQA review.

14-13: The comment states that the EA does not provide quantitative analysis of the reported shortfall in GHG emissions reductions from the proposed SB 375 targets compared to the amount called for from passenger vehicles in the Draft 2030 Scoping Plan (-25 percent).

Response: See Master Response 1. As proposed, CARB staff’s proposed targets would result in an additional reduction of GHG emissions of approximately 8 MMT of CO₂ per year in 2035 compared to the current targets, and an estimated 1.5 MMT CO₂ per year additional reduction in 2035 compared to the existing adopted SCSs.

The estimated remaining GHG emissions reductions needed would be approximately 10 MMT CO₂ per year in 2035 based on the Scoping Plan scenario. These remaining GHG emission reductions are attributed to new State-initiated VMT reduction strategies as described on pages 78-79 of, and in Appendix C to, the adopted Scoping Plan Update. CARB may update the SB 375 targets every four years, if needed, so there is
an opportunity to reassess and adapt the role of the SB 375 targets in the State’s overall suite of VMT and GHG emission reduction strategies on an ongoing basis.

14-14: The comment states that the Draft EA fails to evaluate the potential that the proposed per capita GHG emissions reductions could be inadequate to avoid impeding attainment of SB 32 targets.

Response: See response to comments 14-11 and 1-6.

14-15: The comment states that the proposed targets set the expectation of little to no change in mode share and a large increase in VMT in each of the MPO regions, which is legally inadequate in the context of environmental review.

Response: See Master Response 2, 14-3 and 14-4.

14-16: The comment disputes the claim on page E-147 of the Draft EA that states that CARB found no comments suggesting an alternative comprehensive approach that would meet the State’s long-term goals. The comment is an introduction to comment 14-17, which advocates the use of regional GHG emissions as the metric for determining achievement of the SB 375 mandate.

Response: Please see response to comment 14-17 below.

14-17: The comment recommends a project alternative that would use overall regional GHG emissions as the metric, instead of the per capita GHG emissions reduction metric used since the original adoption of SB 375 targets. The comment states that the use of the per capita metric masks overall GHG emissions increases.

Response: The merits of using the per capita metric instead of the overall GHG metric were evaluated in Alternative 4 of CARB’s 2010 CEQA Functional Equivalent Document (FED) prepared to address the initial regional GHG emissions reduction targets developed pursuant to SB 375 (State Clearinghouse No. 2010081021). As explained in that document, SB 375 gives CARB the discretion to use any metric it deems appropriate (CARB 2010:21). In the discussion of Alternative 4, CARB evaluated the benefits and drawbacks of using overall regional emissions as a metric and concluded that the per capita metric was its preferred metric (CARB 2010:22). CARB noted that the use of an absolute metric could result in unfairly distributed emissions reduction burdens if assumptions about emissions or population growth were changed after the original targets were set. See also Master Response 2, on how under the proposed SB 375 targets, the per capita rate of VMT and associated GHG emission growth would be even lower than under existing conditions.

In addition, see Master Responses 1 and 2. The Alternative envisioned by the commenter would be more stringent than Alternative 4 analyzed in the Draft EA, and for the same reasons presented in the Draft EA, this Alternative would be infeasible. The 2030 Scoping Plan is the State’s roadmap to achieve the outcome desired by the commenter: a reduction in total GHG emissions from the transportation sector.
14-18: The comment states that the project objectives identified in the Draft EA do not include “significant reductions in GHG emissions from changed land use patterns and improved transportation” to achieve the goals in AB 32.

Response: See Master Response 2. Furthermore, the project objectives do include reductions in GHG emissions from changed land use and improved transportation, as indicated on page E-148 of the Draft EA, and clarified in the Final EA:

Project Objective #3: “Update regional GHG emissions reduction targets to further the objectives set forth in SB 32 and Executive Order B-30-15, specifically that would, if implemented, result in greater GHG emission reductions directly from transportation and land use strategies compared to reductions that would be achieved under currently adopted SCSs. Targets would contribute to achieving the overall statewide GHG emissions reduction target of 40 percent below 1990 levels by 2030, as well as support achievement of our statewide public health and air quality objectives.”

14-19: The comment states that all Alternatives need to be evaluated against the objective referenced in comment 14-18 to determine whether total emissions would be reduced.

Response: Please see responses to comments 14-17 and 14-18. As required by CEQA, CARB has considered consistency with project objectives in evaluating the project alternatives.

14-20: The comment states that SB 375 mandates that CARB adopt targets that achieve at least the levels of VMT reductions contemplated in Alternative 4.

Response: Neither CEQA nor SB 375 requires CARB to select a particular alternative over the proposed project. As discussed in the EA, the proposed project would meet the project objectives, and is fully consistent with SB 375 and other laws. Alternatives need only be considered if they can substantially reduce significant environmental impacts, can attain most of the basic project objectives, are potentially feasible, and are reasonable and realistic. (14 CCR § 15126.6(c).)

As stated on page E-154 of the Draft EA, Alternative 4 was rejected because the increased stringency of the targets would be less likely to come to fruition than the proposed targets and because the alternative would likely result in a greater magnitude of environmental effects.

See also Master Responses 1 and 2 and response to comment 14-17.

14-21: The comment provides an excerpt from the analysis of Alternative 4 of the Draft EA, pages E-148 and E-149.

Response: Please see response to comment 14-22 below.

14-22: The comment questions whether any VMT or GHG emissions reductions have occurred due to implementation of an SCS.
Response: See Master Response 2. In addition, RTP/SCSs are 20+ year plans, with
time horizons beyond 2035. Regional land use change takes years to occur. We may
not see the true effects of SB 375 for many years to come. Please see pages D-18 and
D-19 of the Draft Staff Report on CARB’s efforts to monitor SCS performance and SB
375 implementation over time. In addition, SB 150 was signed into law on October 10,
2017, which requires CARB to conduct monitoring of SB 375 implementation and
achievement of the regional GHG emissions reduction targets, and report to the
Legislature on MPOs’ progress every four years starting in 2018.

See also Master Response 1, regarding the distinction between forgoing potential
additional benefits and actual environmental impacts regarding CEQA review.

14-23, 14-24: The comment calls into question CARB’s analysis of Alternative 4 (pg. E-
153 through E-154 of the Draft EA) and assumption that many MPOs would be forced to
rely on an Alternative Planning Strategy (APS) instead of an SCS under this Alternative,
which would hinder achievement of the State’s GHG emissions reduction goals. The
commenter implies that MPOs should be expected to cease building additional roadway
capacity.

Response: See Master Response 1 and response to comment 14-17.

14-25: The comment states that the Draft EA fails to adequately disclose the
environmental impacts of adopting the proposed targets, which do not meet the
requirements for reducing GHG emissions as represented in the 2017 draft Scoping
Plan. The comment further states that the Draft EA’s analysis of alternatives is flawed
and that the Draft EA is legally inadequate.

Response: Please see response to comment 14-11 for a discussion of the Target
Update relative to the 2017 Scoping Plan. Please see response to comments 14-22
through 14-24 for detailed responses to comments on Alternative 4.

14-26: The comment states that increases in regional GHG emissions threaten the
Scoping Plan’s ability to achieve statewide climate targets. The commenter also
requests that CARB make an SB 375 version of the EMFAC model available for MPOs
to calculate regional emissions without the reductions that come from state-level
measures.

Response: See Master Response 1. CARB has provided the MPOs with guidance for
evaluating SB 375 regional emissions in its Description of Methodology for ARB Staff
Review of Greenhouse Gas Reductions from Sustainable Communities Strategies
(SCS) Pursuant to SB 375 available at:
https://www.arb.ca.gov/cc/sb375/scs_review_methodology.pdf.

In addition, the EMFAC model is already equipped with the functionality requested by
the commenter to evaluate regional light-duty vehicle emissions for purposes of SB 375
compliance. The “SB 375 On” function in the EMFAC model removes the effects of
state-level vehicle fleet regulations. MPOs are instructed to use the “SB 375 On”
function when evaluating their GHG emissions from their SCS against their assigned SB 375 target.

The remainder of the comment letter does not raise significant environmental issues related to the Draft EA. The comments are noted and are being provided to the Board members for their consideration, but no further response to this letter is required.
The comment raises concerns that the Climate Initiatives Program adopted as part of MTC’s 2040 RTP/SCS will not reduce VMT from light-duty vehicles.

Response: This is a comment on the individual strategies adopted as part of the Bay Area MPO’s (MTC’s) most-recent RTP/SCS, and not a comment directly on the proposed project (the SB 375 Target Update). While more sustainable land use is the fundamental objective of SB 375, CARB also encourages the MPOs to achieve passenger vehicle GHG emissions reductions from all available means. The Draft EA does assume continued and increased deployment of the types of strategies addressed by this comment (e.g., infrastructure for electric vehicles, smart driving education programs). Some of these programs are expected to reduce VMT and associated GHG emissions, but others reduce GHG emissions through other means. SB 375 calls for CARB to set regional GHG emissions reductions targets (Government Code 65050(b)(2)(A). MPOs are eligible to demonstrate light-duty vehicle GHG emissions reductions through many innovative transportation strategies in an SCS, and are not limited to VMT-reducing land use strategies. GHG emission reductions are needed from all aspects of the transportation sector, including vehicle travel activity or vehicle miles traveled (VMT), fleet efficiency (miles per gallon), and vehicle technology (electric vehicles). There is a role for MPOs in planning for and incentivizing electric vehicle (EV) infrastructure. MPOs also provide funding for programs that increase mobility options, such as car sharing, ridesharing/vanpools, and bike sharing programs, but to which MPO travel demand models are not sensitive. Those strategies may be accounted for “off-model” through manual calculations based on documented sources.

The comment supports the proposed target for MTC of 19 percent per capita GHG emission reduction by 2035, and notes that target achievement must be provable based on evidence.

Response: CARB staff agrees that each MPO must substantiate target achievement with evidence presented in its SCS and documentation submitted in accordance with CARB’s latest review methodology: Description of Methodology for ARB Staff Review of Greenhouse Gas Reductions from Sustainable Communities Strategies (SCS) Pursuant to SB 375 at (https://www.arb.ca.gov/cc/sb375/scs_review_methodology.pdf). The comment is noted and will be provided to the Board members for their consideration, but no further response to this comment is required.

The remainder of the comment letter does not raise significant environmental issues related to the Draft EA. The comments are noted and are being provided to the Board members for their consideration, but no further response to this letter is required.
34-1: The comment states that construction of California’s High-Speed Rail project would result in air pollutant emissions that could impact neighboring states.

Response: California’s High-Speed Rail project is not part of the proposed project, which is the SB 375 Target Update. The comment letter does not address the adequacy, accuracy, or completeness of the Draft EA and no changes to the Draft EA are required in response to this comment. The comment is noted and will be provided to the Board members for their consideration, but no further response to this letter is required.
The comment was received after the close of the public review period, and does not require a response pursuant to PRC section 21091(d)(1). However, though not required to do so, CARB is choosing to respond to the comment to provide further clarity consistent with the purposes of CEQA.

37-1: The comment states that CARB should analyze the environmental effects of new housing legislation in the Final EA for the Target Update.

Response: The environmental effects of the new legislation are beyond the scope of the proposed project; however, the legislation cited by the commenter (AB 2299, Bloom, and SB 1069, Wieckowski) is part of a package of legislation signed into law in September 2016. This new legislation is intended to help streamline and facilitate infill housing development, specifically accessory dwelling units. Increased infill development is one of the foreseeable compliance responses associated with the proposed project, and the associated environmental effects were evaluated and disclosed in the Draft EA. The comment is noted and will be provided to the Board members for their consideration, but no further response to this letter is required.
The comment was received after the close of the public review period, and does not require a response pursuant to PRC section 21091(d)(1). However, though not required to do so, CARB is choosing to respond to the comment to provide further clarity consistent with the purposes of CEQA.

**Comment 38-1:** The comment states that CARB should analyze the environmental effects of new housing legislation in the Final EA for the Target Update.

**Response:** The environmental effects of the new housing legislation, signed into law in September 2017 as part of a package of legislation, are beyond the scope of the proposed project. Please see response to comment 37-1. The comment is noted and will be provided to the Board members for their consideration, but no further response to this letter is required.
The comment letter was received after the close of the public review period, and does not require a response pursuant to PRC section 21091(d)(1). However, though not required to do so, CARB is choosing to respond to the comment to provide further clarity consistent with the purposes of CEQA.

Comment 40-1: The comment identifies concerns with a specific policy in the proposed\(^2\) climate action plan (CAP) prepared by San Diego County, which establishes a framework through which carbon offsets could be used as mitigation for GHG emissions attributable to new development under the California Environmental Quality Act (CEQA). The commenter raises concerns that this proposed policy within the County’s CAP could interfere with the San Diego Association of Governments’ (SANDAG) ability to meet the existing and proposed SB 375 targets through its regional SCS. Specifically, the commenter asserts that this policy could facilitate development that could increase VMT in the SANDAG region, without requiring corresponding reductions in VMT. The commenter questions whether SANDAG could meet the existing or proposed SB 375 targets with the proposed CAP policy in place, and calls for SANDAG to conduct additional modeling to determine whether SANDAG could comply with the SB 375 targets if pending or proposed amendments to the County’s General Plan land use designations were to utilize this new provision under the CAP.

Response: This comment does not cite to a specific concern regarding the adequacy, accuracy, or completeness of the Draft EA, but rather calls into question the feasibility of a particular compliance implementation situation related to the proposed project. This comment questions a specific policy of a local member jurisdiction within the SANDAG region, which calls into question SANDAG’s ability to implement its most-recent and subsequent RTP/SCSs that are subject to current and proposed SB 375 targets, respectively. The County’s CAP itself would not result in any specific development proposals or amendments to the County’s existing general plan. Any specific development proposals that would require a discretionary action and subsequent entitlements by the County would undergo review under CEQA, and would be subject to related environmental analysis.

Local land use approvals are within the authority of the local jurisdictions, and outside of SANDAG’s and CARB’s purview. When SANDAG develops the regional land use scenario and associated transportation network for its SCS, these become inputs into the region’s travel demand modeling. The associated travel demand modeling performed by SANDAG is the primary basis for CARB’s determination of whether an SCS would meet its assigned SB 375 GHG emissions reduction targets. Local discretionary actions, such as land use development approvals of different intensities

\(^2\) The proposed San Diego County Climate Action Plan was subsequently adopted by the San Diego County Board of Supervisors on February 14, 2018.
than were assumed by SANDAG, can cause deviations from the assumptions used in SANDAG’s travel demand modeling performed for its SCS, which could theoretically represent increases or decreases in total regional VMT. This issue raised by the commenter strikes at the heart of one of the key challenges with SB 375 implementation to date.

The County CAP policy at issue with the commenter could complicate one of the key considerations in GHG analyses conducted pursuant to CEQA, which is consistency with applicable plans for reduction of GHG emissions\(^3\), which may include the applicable SCS in place at the time development projects are reviewed. However, it would be premature for CARB to speculate on future land use approvals and any related mitigation measures for GHG emissions that could occur in any jurisdiction, including in the SANDAG region, which may be inconsistent with assumptions in an SCS. CARB staff is currently coordinating with SANDAG staff, which is in the process of working with its member local jurisdictions to develop land use assumptions for SANDAG’s 2019 RTP/SCS. CARB staff expects to evaluate SANDAG’s 2019 RTP/SCS to determine whether, if implemented, it would achieve the proposed SB 375 targets of -15 percent and -19 percent reduction in per capita GHG emissions relative to 2005 levels. CARB staff will also be tracking SCS implementation and target achievement over time, as required by recent amendments to SB 375.

CARB maintains its position set forth in the 2017 Scoping Plan that lead agencies have the discretion to develop their own evidence-based numeric thresholds for GHG emissions consistent with evolving climate change science, law, and policy. To the degree a project relies on GHG mitigation measures, CARB recommends that lead agencies prioritize on-site design features that reduce emissions, especially from VMT, and direct investments in GHG reductions within the project’s region that contribute potential air quality, health, and economic co-benefits locally. Local direct investments in actions to reduce GHG emissions should be supported by quantification methodologies that show the reductions are real, verifiable, quantifiable, permanent, and enforceable. Where further project design or regional investments are infeasible or not proven to be effective, it may be appropriate and feasible to mitigate project emissions through purchasing and retiring carbon credits.\(^4\)

It will be important for local lead agencies to continue to evaluate the consistency of land use development projects with the applicable SCS. CARB recommends that lead agencies follow the locational hierarchy of GHG mitigation described in CARB’s 2017 Scoping Plan to avoid the scenario raised by the commenter, whereby carbon offsets

\(^3\) See CEQA Guidelines, Appendix G. VII. Greenhouse Gas Emissions ("(b) Would the proposed project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?"); see also CEQA Guidelines § 115064.4(b)(3).

purchased from outside the MPO region are used to mitigate an increase in vehicle-related GHG emissions, making it more difficult for the MPO to implement its SCS.

**Comment 40-2:** The commenter references CARB’s 2017 Climate Change Scoping Plan and proposed update to the SB 375 targets, including statements that emphasize the importance of achieving the proposed per capita GHG emissions reductions predominantly through reductions in VMT.

**Response:** This comment does not cite to a specific concern regarding the adequacy, accuracy, or completeness of the Draft EA. The commenter references CARB staff’s October 2017 staff report, which included a 2035 target for SANDAG of 21 percent. Staff’s proposed 2035 target for SANDAG has been revised to 19 percent, and this revision is reflected in the Updated Final Staff Report (February 2018) and Final EA. CARB staff would like to clarify that CARB does not adopt VMT targets. The commenter correctly mentions CARB’s position that VMT reduction strategies are an integral component of meeting the GHG emissions reductions called for from the transportation sector, and the State will not meet its GHG emissions reduction mandates under SB 32 without strategies that lead to reductions in VMT.

**Comment 40-3:** The commenter raises concerns that the County’s CAP allows for carbon offsets as eligible mitigation for increases in GHG emissions associated with increased VMT from land use development projects that involve amendments to the County’s 2011 General Plan. The commenter calls on SANDAG and the County to analyze the impacts of a less-dense land use scenario on VMT. The commenter suggests that CARB coordinate with SANDAG and the County to ensure that SANDAG can meet its SB 375 GHG emissions reduction targets.

**Response:** This comment does not cite to a specific concern regarding the adequacy, accuracy, or completeness of the Draft EA. The commenter requests additional analysis be undertaken by outside agencies (SANDAG and San Diego County), which is beyond the scope of the EA prepared for this project.

CARB will continue to coordinate with SANDAG during development of its 2019 RTP/SCS to understand whether local discretionary land use approvals within the SANDAG region help or hinder SANDAG’s ability to meet the region’s GHG emissions reduction targets under SB 375, including the more stringent targets proposed under this project.

**Comment 40-4:** The commenter identifies comments made by local San Diego County officials, including by CARB Board member, County Supervisor Ron Roberts, that conflict with CARB’s position in the 2017 Scoping Plan that VMT reductions are an important component of meeting the State’s GHG emissions reduction targets.

**Response:** This comment does not cite to a specific concern regarding the adequacy, accuracy, or completeness of the Draft EA. CARB maintains its position that VMT reductions will be necessary to achieve the State’s 2030 GHG emissions reduction goals and the SB 375 GHG emissions reduction targets. Deployment of electric vehicle
technology and renewable fuels are important pieces of the State’s clean air and climate strategy, but analysis for the State Implementation and Scoping Plans revealed that VMT reductions are necessary to achieve our climate and air quality goals for a number of reasons. Even with aggressive deployment of zero-emission vehicles, there will still be a substantial number of combustion vehicles on the road in California in 2030 and 2035 that would still result in emissions of criteria air pollutants, toxic air contaminants, and GHGs. Curbing VMT growth reduces tailpipe emissions of these combustion vehicles, and can reduce emissions associated with the production of fuels to power both combustion and zero-emission vehicles. The electricity required to power electric vehicles will also not be fully renewable by 2030 or 2035. Current renewable portfolio standards require 50 percent of electricity be generated from renewable sources by 2030. Compact, lower-VMT development patterns that lead to increased active transportation modes provide essential public health benefits.

Comment 40-5: The commenter suggests that SANDAG and the County coordinate on a cumulative analysis using SANDAG’s transportation model to evaluate the impact of general plan amendment projects that could be approved using the CAP’s offset program. The commenter also suggests that CARB coordinate with SANDAG and the County to ensure that SANDAG can meet its SB 375 GHG emissions reduction targets.

Response: See responses to comments 40-1 and 40-3. The commenter requests additional analysis be undertaken by outside agencies (SANDAG and San Diego County), which is beyond the scope of the EA prepared for this project.
ATTACHMENT A

COMMENT LETTERS
Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  

Re: 2017 Regional Target Update  

Dear Ms. Nichols:  

The Transportation Solutions Defense and Education Fund (TRANSDEF) is an environmental non-profit dedicated to the regional planning of transportation, land use and air quality. Our focus is on reducing the impacts of transportation on the climate. We have previously commented on multiple versions of the Scoping Plan and Regional Targets. Page references are to the Staff Report, Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, unless otherwise noted. A separate letter will comment on the Environmental Assessment for the Targets Update.

Our organization has been involved in the development of RTPs at MTC for the past 23 years. We created what we believe to be the first published Sustainable Communities Strategy: the TRANSDEF Smart Growth Alternative, which was modeled in the MTC’s 2005 RTP EIR. We were active participants in the Working Group that revised the CTC’s RTP Guidelines in response to the adoption of AB 32 and SB 375. This breadth and depth of experience forms a basis for the following observations:

The Proposed Targets Fail to Meet the Requirements of SB 375  

In the recently released inventory titled California Greenhouse Gas Emissions for 2000 to 2015 – Trends of Emissions and Other Indicators, the largest still-increasing single emissions category is passenger vehicles. TRANSDEF believes this source represents the largest threat to the achievement of Scoping Plan goals, as SB 375 foresaw long ago. The staff’s response to that threat, their proposal for SB 375 regional GHG emissions target updates, is extraordinarily inadequate:

At the personal travel level, CARB staff’s proposed targets are equivalent to reducing VMT a half a mile per person per day. (p. 22.)

The staff report starts out reasonably enough:
CARB staff’s top-down analysis estimates that SB 375 and other VMT reduction strategies need to provide a 25 percent reduction in statewide per capita greenhouse gas emissions relative to 2005 by 2035 to meet these goals... (Id.)

But then, as a casualty of obvious political pressure, the proposed targets offer only a 19.9% aggregate reduction, failing to meet that requirement. No justification is provided in the staff report for this catering to the MPOs, other than vague references to funding (p. 19) and not being out of reach. (p. 24.) Even worse, nothing is said about the gap in emissions reductions, or where the reductions will come from, if not from transportation.

These comments on the proposed targets would have been far less critical, had we not just completed a set of detailed comments on MTC’s 2017 RTP/SCS. We strongly suspect the following observations, based on a close reading of MTC’s DEIR, are equally applicable to the other MPOs:

- There are no signs of VMT reduction. To the contrary, drive-alone trips will increase by 21% by 2040. As a result, GHG emissions are projected to increase by 20%, prior to off-model adjustments.
- Large amounts of funding are dedicated to highway expansion, MTC’s primary strategy for future mobility--even though ARB research has documented the futility of that strategy in papers on induced demand.
- Mode shares remain static through 2040, indicating that new residents are not projected to drive any less than current residents. This indicates that the SCS has had no beneficial effect on land use, VMT or GHG emissions.
- The DEIR claims that "There are no additional land use strategies available to feasibly bridge the gap between the proposed Plan GHG emissions and 2030 (and beyond) targets." (DEIR p. 2.5-43.) By this, they mean there are no strategies they are willing to adopt.
- The absence of any formal coordination between county plans and the SCS acts as a green light for counties to continue with Business as Usual.

We are confident that ARB staff plans to track near-term indicators of SCS implementation (p. 26) will confirm these findings.

In toto, MTC’s approach to SB 375 is to not even seriously try to reduce VMT. This is reflected in Table 2 (p. 19), where MTC provided no quantitative data to ARB. MTC refused to study a GHG Emissions Reduction Alternative proposed by TRANSDEF.

TRANSDEF is enormously troubled by ARB’s catering to this intransigence, in the midst of a climate emergency. Scientists inform us that there are only a few years left to correct our emissions overhang before irreversible changes take place. We call on ARB to apply what it knows in setting these targets--and not be swayed by the MPOs' resistance to change. Do not take their protestations at face value.
SB 375
We believe this proposal, if adopted, would constitute a failure to perform a mandatory duty under SB 375 to cut regional emissions from cars and light trucks. The legislative findings make it clear what SB 375 set out to accomplish:

...greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32. (Chapter 728, Statutes of 2008, Section 1(c) and (i), emphasis added.)

The staff report is silent on whether the targets will result in significant additional GHG reductions from changed land use patterns and improved transportation, despite that analysis being the key to what is required by SB 375. Instead, it only discusses per capita GHG emissions reductions, which is a different metric--and not directly relevant.

The Missing Analysis
In 2010, TRANSDEF commented that the calculations for the draft regional GHG emissions reduction targets showed total 2020 regional transportation-related emissions that were higher than 2005, and higher still in 2035. The 2017 staff report provides no such analysis, sticking only with per capita GHG emissions. While it may be legally acceptable to administer the SB 375 program using per capita targets, the failure to demonstrate a reduction in total regional transportation-related emissions constitutes a failure to perform mandatory duties under SB 375.

What's missing is a discussion of population growth and the mode choices for new residents living amidst the supposedly more efficient land use pattern of the SCS. Comparing the relative magnitude of the increment of growth to the existing population will allow a projection of total transportation-related GHG emissions.

The 2010 per capita GHG percentage emission reduction targets resulted in increases in total GHG emissions, because they were set lower than the expected percentage increase in population growth. This is ARB's dirty little secret: it allows ARB to avoid pressuring MPOs to perform in ways they strongly resist.

Problems With the Staff Report
How can the following statement possibly be true, when the targets do not achieve the 25% reduction target?

CARB staff’s proposed targets are consistent with the SB 375 target update objectives discussed in Section II [p. 4-5].
(p. 24.)
Note that the objectives do not include reducing total regional transportation-related GHG emissions. Why is that, and does that absence mean that the objectives fail to comply with AB 32 and SB 375?

These targets do not force MPOs to give up on expanding capacity for solo drivers. Because California has not seen any VMT reductions yet under the lax conditions of current policy, future VMT reductions under similarly lax conditions are very unlikely.

It should have been obvious to ARB that funding is not the problem MPOs have claimed. (p. 19.) The problem isn't money. MPOs don't want to stop allocating funds to roadway capacity. There would be enough funding if MPOs were directed to stop expanding roadway capacity.

TRANSDEF is unaware of any significant mode shift so far resulting from SB 375. VMT has continued to climb.

San Joaquin Valley Targets
The very fact that the San Joaquin Valley is expected to grow so much means it can realistically handle a much higher target. The problem is obviously that it doesn't want to change its sprawled land use pattern. Is it really acceptable for the Valley to actually increase its GHG emissions? Giving the Valley an aggressive target will encourage the use of Best Practices for new development. It is crucial to not squander the opportunity to reshape settlement patterns. This will make a tremendous difference in 2050 emissions.

Induced Demand
Caltrans and the MPOs are stuck in a 1980's view that expanding capacity reduces congestion and therefore reduces GHG emissions. That view is the result of using obsolete models, which fail to account for induced demand. Current ARB research indicates that while highway widening may have congestion relief benefits in the short-term, in the long-term such projects induce further demand, resulting in increased trips, longer trips, and increased VMT and GHG emissions. (Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions, 2014.) Because of travel models that fail to accurately represent induced demand, MPOs are significantly undercounting the emissions-increasing impacts of their highway expansion programs. This is worrisome as regards selecting infrastructure investments that will set a foundation for achieving California's very aggressive 2050 goals.

Pricing
A founding principle of ARB's target setting has been that because land use effects are long-term, it is logical that the 2020 targets be lower than the 2035 targets. This completely ignores the realm of pricing measures, which can be implemented very quickly. Pricing requires strong leadership to educate the public about the need for the increased price of driving. We fully recognize this will take political courage and offer to assist in any way we can.
Timing
We reject the idea that lower, more achievable, targets are a wise idea. We don’t have 10 or 20 years to build confidence. Unfortunately, climate is not a problem that can be responded to at a pace that is comfortable for government.

Margin of Safety
We recommend that target setting include the provision of a margin of safety, as is commonplace in the setting of health-based criteria pollutant standards.

Conclusion
The ARB is responsible for determining which regional targets will best implement the intent of AB 32. The question “will we accomplish our Scoping Plan goals with these targets?” should have been central to the target-setting process. But it clearly wasn’t. It looks to us like the target setting process has been turned into a process that caters to the MPOs’ desire for minimal controversy, rather than a process with “a sound technical basis.” We are fully cognizant of the political challenges faced by ARB. TRANSDEF urges the Air Resources Board to step up to the challenge, armed with the best science available.

Right now, science is telling us what needs to be done and government is not doing it. This target setting process is not just a technical exercise. ARB’s work needs to become a national and global model for the responsible planning of development. If human civilization is to survive global warming, it is crucial that targets be adopted that lead to sufficient change to meet the State’s aggressive goals. Failure to do so is not an option.

The top-down process tied to the Scoping Plan’s goals provides needed justification for making uncomfortable policy decisions at the State, regional and local levels. Local elected officials especially need this kind of evidentiary backup--they will be on the front lines, making scary decisions for a public that does not like change. Please give them the leadership and the guidance they need to play their part in the upcoming difficult transition to a low-carbon way of life.

We would be pleased to answer any questions you might have, at the phone number above.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President
Clerk of the Board, Air Resources Board
1001 I Street
Sacramento, CA 95814
Electronic Submittal (http://www.arb.ca.gov/lispub/comm/bclist.php)

Re: Comment on the Draft Environmental Analysis and Staff Report for the Proposed Update to the SB 375 Greenhouse Gas Reduction Targets

July 21, 2017

Dear Clerk of the Board,

Thank you for the opportunity to comment on the ARB staff recommendation for the proposed update to the SB 375 Greenhouse Gas reduction targets. Kern COG believes that the ARB staff report, “Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets”, is unacceptably vague in its proposal of new SB 375 target recommendations and that it does not give proper consideration to targets recommended by regional agencies, creating a strong potential for Alternative Planning Strategies (APS) in place of Sustainable Community Strategies (SCS). Kern COG requests that you accept the targets we proposed in our December 2016 and April 2017 report submittals to ARB.

Local travel demand models take into consideration millions of variables that reflect the diverse neighborhood level conditions throughout a region. Kern is unlike other regions with a self-contained model capturing close to 100% of its commuter’s travel shed; a rural ex-urban commute pattern to strategic employment centers (ag, energy, logistics, tourism, prisons, and military); diverse valley, mountain and desert travel characteristics, covering an area twice the size of Los Angeles County; and disadvantaged communities unable to travel as much as more affluent areas of the state.

ARB justification for not going with our MPO recommended targets for 2035, discounts local model information that more accurately reflects the actual local circumstances in the region. ARB staff has proposed use of an arbitrary “step-up” approach to the percent per capita reduction target performance in the prior SCS based on the size and potential growth in each region regardless of modeling results. The largest regions received an additional 3 percentage point reduction, mid-sized regions like Kern received an additional 2 and the small regions received an additional 1 percentage point reduction. We request that ARB remove this step-up approach and accept the target unanimously approved by the Kern COG Board for the following reasons:

1. **Compare 2nd Round Targets to 2nd Round Targets** - Second round targets proposed by ARB for Kern and its disadvantaged communities are 2 percentage points more ambitious than those ARB assigned to Southern California in their second round of target setting. Like the major metropolitan areas, the Valley should be allowed more time to implement and learn from its strategy efforts before
setting the bar above Southern California's 2nd round of targets. Especially since we lack the same density and transit option strategies of Southern California.

2. **Valley Household Travel is Half What it is in Affluent Coastal Communities** - Vehicle Miles Traveled (VMT) per capita in Kern and the San Joaquin Valley are already half what it is in the more affluent Southern California and Bay Area regions. This is because the State's most disadvantaged communities are largely located in the San Joaquin Valley, where many communities still suffer from double digit unemployment. Residents in these communities are limited to only making essential trips using the lowest cost options available to them. For rural destinations, low cost transit is not one of those options. In Kern, half of all vehicles contain more than one occupant, and vanpooling to work is rapidly expanding.

3. **Account for Economic Rebound in Disadvantaged Communities** - Due to the downturn in the energy sector, Kern is lagging behind Fresno and much of the Valley now emerging from the 2008 recession. Fresno is seeing travel per capita increase. Consequently, Fresno's target is being set 2 percentage points lower than Kern's in part because per capita vehicle miles traveled, driven by their economic recovery, is increasing faster than in the Kern region. ARB must consider the economic impact to Kern's disadvantaged communities when setting targets. Targets should be set to allow for the possibility of economic rebound in disadvantaged communities where vehicle miles traveled per household is likely to increase toward state average rates should employment opportunities improve. Eliminating the step-up approach helps provide a cushion for economic rebound of disadvantage communities.

4. **Unanticipated Challenges in Implementing 2014 SCS** – Kern COG is committed to strategies such as infill development, active transportation, etc. but is seeing some of our tools become less effective or delayed, requiring expanded efforts in other areas to maintain current target demonstration progress, making an increase beyond our recommended target more likely to trigger an APS.
   A. New state groundwater regulations may have a serious impact on the rate and location of growth, affecting the preferred SCS development pattern.
   B. Infill infrastructure and housing in the San Joaquin Valley is severely hampered by the loss of redevelopment's tax increment finance mechanism. For example, Bakersfield has received over $1M from the Strategic Growth Council's Affordable Housing Sustainable Communities program. This new funding has replaced less than half of the funding once generated annually by the former redevelopment agency, and the Housing & Community Development department staff has shrunk by more than half. Still, Bakersfield has seen infill housing downtown since the adoption of the Kern Blueprint increase 4 fold thanks in part to market rate housing, and a reduced-fee driven downtown infill incentive program. However this downtown resurgence is not as fast as assumed in the 2014 SCS. Fresno however has received over $70M from the state Transformative Communities Program but have a target that is being set lower than Kern's.
   C. Federal community development block grant funding is another major source for infill and pedestrian facilities, and is now being considered for curtailment.
   D. Since the adoption of the 2014 RTP/SCS the State has delayed a major market incentive for infill in the Kern region. The State has delayed the building of the HSR station in Bakersfield by approximately 10 years with a decision to build north to the Bay Area first.
Kern COG’s member agencies are committed to achieving and exceeding the targets demonstrated in the 2014 RTP. Our region is accelerating SCS existing strategies and implementing new ones. Our jurisdictions have been the most aggressive and successful region in the State in pursuing Active Transportation Program (ATP) grants, accelerating delivery of 20-years’ worth of anticipated funding for bike and ped facilities in the first 4-years of the SCS! In addition, one promising new strategy is promoting 4,000 workplace vehicle charging spaces by 2025 to provide an incentive for accelerated electric vehicle purchases in the region. Local regions need flexibility to adapt their SCSs to these changing conditions caused by situations outside their local control. Placing an arbitrary increase in the target does not take into account the uncertainty in implementing new strategies and may unnecessarily force a region into an SCS where the strategies become voluntary, undermining the progress we are currently making.

5. **Rebound Effect** – ARB has ignored specific modeling provided the valley COG’s showing that the rebound effect created by lower travel costs from more fuel efficient vehicles and shared mobility technology ranges from 40% higher for Kern up to 700% higher for other Valley COGs compared to ARB’s analysis. Target setting adjustments should be set based on local conditions which vary greatly throughout the state.

6. **Preliminary Modeling** - Kern COG modeling to date is still being improved for accuracy. A second consultant has been hired to assist with this process and is providing an independent, fully documented peer review of the new model. Use of preliminary modeling in target setting creates additional uncertainties that need to be considered by the target setting process.

As a region our Board is committed to implement every strategy we can find resources for to meet and exceed our SCS targets. According to the Caltrans Highway Performance Monitoring Program, Since 1990 Kern is out-performing the state in total VMT per capita reduction at -4.4% compared to -.3% statewide since 1990. We attribute this to our extensive bottoms-up outreach effort for the 2014 RTP/SCS which garnered input from 1% of the region’s population including our disadvantaged communities. Increasing the target using the step-up approach ignores the public input that went into the 2014 SCS and is reflected in the improved local modeling we proposed for our target.

In addition, our region is highly motivated to implement these strategies because of the numerous co-benefits, especially cleaner air. It is because of this that Kern has identified 55 strategy success stories that we are working hard to implement. Projects on the ground are a much more tangible measure of the success of an SCS than a numbers exercise that will be updated as information improves. We look forward in working closely with ARB to find the funding to fully implement these strategies as rapidly as possible.

Sincerely,

Cheryl Wegman
Chair

Attachments
ATTACHMENT A

Kern RTP/SCS Highlights
Sustainable Community Strategy Highlights

Kern Council of Governments (Kern COG)

Kern COG’s Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS) will help the State of California meet its climate change goals and the requirements of Senate Bill 375.

Kern COG Draft 2018 - 2042 RTP/SCS Plan

Located at the crossroads of California, Kern COG is a single county region that serves as the Northern gateway to the Southern California as well as the gateway between Northern California and the national I-40 corridor. The region is roughly home to 900,000, and is expected to add over ½ million people, 150,000 jobs and 160,000 households by 2042. The RTP/SCS is the Kern region’s strategy to meet the near-term and future needs of its residents. As with the previous Plan, implementation is expected to increase the region’s transportation options and access to jobs while reducing the distance traveled between jobs and housing. Kern COG’s 2014 RTP/SCS is expected to help California meet its greenhouse gas reduction goals by meeting its SB 375 targets to be updated by 2018.

RTP/SCS Key Strategy Highlights

Kern COG’s 2014 RTP/SCS Included strategies that signal a major change from the prior plans, promoting a more efficient land use pattern/transportation system. The 2018 RTP/SCS will build on this success:

- **Advancing All Communities** – Environmental Justice communities receive 36% of highway investment and 60% of transit investment but only account for 18% and 48% of passenger miles traveled respectively.
- **Active Transportation** - 1000+ miles of new/safer bike facilities by 2040, funded in-part by a 700% increase in existing sources re-directed to bike and pedestrian infrastructure resulting in a 5+% decrease in household medical costs by promoting cleaner air and more active life-styles. And these facilities are being built faster than anticipated with Kern receiving 20 years of anticipated Active Transportation Program funding in the first 3 years of the plan.
- **Improved Transit Access** - 4,000% increase (10,600 to 473,000) in homes + jobs within 1/2 mile of passenger rail stops and high frequency transit (<15 min.).
- **Improved Transit Investment** – Over a 700% increase in transit related capital spending over prior plan including BRT, express bus, transit/HOV lanes, park & ride facilities, vanpooling, and commuter rail (not including high speed rail expenditures in Kern).
- **Revitalization of Existing Communities** - 46% reduction in the rate of farmland loss to urban uses compared to the previous 22 years (from 1.8 mi²/yr to <1), 11% decrease in infrastructure costs, and a 10% reduction in water use by providing a full range of housing choices.
- **Transportation System/Demand Management** – Improved system management and technology is helping to slow travel growth, allowing the delay of two beltways and the redirection of up to $2B in highway funding to transit and active transportation.
Measuring the Benefits of the 2014 RTP/SCS

Forecasted Development Pattern – Metropolitan Bakersfield (Growth Only)

2040 transportation analysis zone data is based on UPlan land use model. For the latest growth planning assumptions refer to local general plans.

Bakersfield is seeing an accelerating resurgence in downtown development. In the past 10 years 434 infill housing units have been built in central Bakersfield, an increase of over 400% compared to the previous 16 years.

RTP/SCS Key Outreach Highlights
After more than three years of extensive public input garnering input from over 8,000 participants, the Kern COG Board approved a slate of alternatives for inclusion in the EIR including the plan alternative to move forward with during the 55 day public comment period in 2014. Key Outreach Activities Included:
- Business/Industry and Environmental/Social Equity Roundtable stakeholder meetings;
- Twenty-seven community workshops and meetings;
- Directions to 2050 website with two online activities and an online survey to garner input;
- Presentations before the eleven member agency City Councils and the Kern County Board of Supervisors; and
- Presentations to local organizations upon request.

Similar outreach efforts are underway for the 2018 RTP/SCS.

For More Information
The Kern COG RTP/SCS can be found at the following web address www.kerncog.org/regional-transportation-plan. For additional information regarding the Kern COG 2018 RTP/SCS, please contact Becky Napier or Rob Ball by phone 661-635-2900 or by email at bnapier@kerncog.org or rball@kerncog.org.
ATTACHMENT B

55 Sustainable Community Success Stories in the Kern Region
Sustainable Communities Strategy (SCS) Success Stories
Benefiting Disadvantaged Communities in Kern

In order to help demonstrate the Kern region’s extensive efforts to comply with state climate change goals, Kern COG has identified related member agency activities. All of the following success stories benefit the disadvantaged communities by improving emissions, however the highlighted strategies benefit Kern’s disadvantaged communities directly:

NEW STRATEGIES

1. Bakersfield High Speed Rail Station Area Plan – Specific/General Plan Update
2. Kern COG 4,000 Workplace Charging Spaces by 2025
3. Improvements to 51 Bus Stops – Metro Bakersfield/Disadvantaged Neighborhoods
4. New Taft Transit Center / Regional Transit Hub
5. Early Delivery of Wasco Disadvantage Community Active Transportation Projects
6. Bakersfield Disadvantage Communities Bike Share & Downtown Bicycle Connectivity Project
7. Kern Highway Projects Advancing Complete Streets
8. Kern Regional Active Transportation Plan Including Disadvantaged Communities
9. Kern COG Intelligent Transportation System Plan Update
10. SJV Rural Transit Shared Mobility Study for Disadvantaged Communities
11. SR 184 Lamont Bike and Pedestrian improvements
12. SR 184 and 155 Roundabouts in Disadvantaged Communities of Delano and Weedpatch
13. Kern County General Plan Update – Land Use, Conservation, Open Space, Circulation, Housing, and other key elements

ENHANCED STRATEGIES (continued)

27. City of Bakersfield 4 New Downtown Infill Housing Projects
28. Cities of McFarland and Shafter – Conversion of transit fleet to electric vehicles
29. Golden Empire Transit – Purchase of 2 Electric Buses
30. Lost Hills Wonderful Park and Communitywide Improvements
31. New Developments Innovative Green Tech

EXISTING/CONTINUING STRATEGIES

32. City of Tehachapi General Plan (Form-Based Code, Transect Zone, Mobility Element, Town Form Element)
33. Infill Incentive Zone – Lower Transportation Impact Fee Core Area
34. City of Taft General Plan – Sustainability Principles
35. City of Ridgecrest General Plan and Multi-Modal Circulation Element
36. Metro Bakersfield General Plan Sewer Policy – Hook-up required for parcels less than 6 acres
37. City of Bakersfield Required Lot Area Zoning Strategies
38. San Joaquin Valley Air District’s Indirect Source Review to Mitigate Off-Site Impacts of Development
39. Transit Priority Areas in the Kern COG SCS
40. Metropolitan Bakersfield General Plan Centers Concept – Transit Priority & Strategic Employment Place Types
41. GET Short-Term Service Plan (2012–2020)
42. GET X-92 Commuter Express bus service to Tejon Industrial Complex
43. Kern511 – Traveler Information System
44. San Joaquin Valley Blueprint Integration Project
45. Caltrans Vehicle Detection System – State Route 43 Intersection Improvements and East Bakersfield Vehicle Detection Systems
46. California Highway Patrol’s Safety Corridors
47. Purchase of CNG Buses (80+ bus fleet)
48. The Electric Cab Company of Delano
49. Downtown Elementary School Expansion (Bakersfield)
50. Traffic Control Devices
51. Kern Region Energy Action Plans (Kern REAP) and Kern Energy Watch Goal 3
52. Tejon Ranch Conservation and Land Use Agreement
53. Kern County Community Revitalization Program
54. Kern Transit – Route Connection with Antelope Valley Transit Authority
55. CSU Bakersfield – Public Transit Center
PROJECT TITLE: Bakersfield High Speed Rail Station Area Plan – Specific/General Plan Update
PROJECT SPONSOR: City of Bakersfield

PROJECT DESCRIPTION:
The City of Bakersfield in partnership with and funding from the California High-Speed Rail Authority, are developing a High Speed Rail Station Area Plan for Downtown Bakersfield. The Plan will serve as vision document that will guide the future development of the HSR station area.

PROJECT BENEFITS:
Based on with an economic impact analysis, the vision document will: increase population and economic density in the urban core; support residential and commercial activity; develop under-utilized or vacant properties; connect existing activity and cultural centers; create an efficient, reliable, and effective multi-modal transportation system; connect existing activity and cultural centers; enhance sustainability, livability and a sense of place; and secure funding for identified implementation actions like a new property-based business improvement district.

COST BENEFIT RATIO: Not Applicable
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: 2017
STATUS: In Progress

Reference: City of Bakersfield, 2016
PROJECT TITLE: 4,000+ Workplace Charging Spaces by 2025
PROJECT SPONSOR: Kern Council of Governments and member agencies

PROJECT DESCRIPTION:
Active Transportation and Demand Management is the Federal Highway Administration's (FHWA's) program to promote active management, control, and influence of travel demand, traffic demand, and travel flow of transportation facilities. Under this program Kern COG member agencies are invited to work with Kern COG staff to capitalize on the resources provided through a new work element and OWP 801.1 grant writing element to develop electric charging infrastructure projects in Kern communities. Together, Kern plans to establish a county-wide network of 2,456 Electric Vehicle Charging Stations (EVSE) (4,320 spaces) at workplaces and public charging locations to support Governor Brown’s 2015 ZEV Action Plan goal of 1.5 million ZEVs on California roads by the year 2025.

PROJECT BENEFITS:
Kern COG’s implementation of Active Transportation Demand Management programs will offer opportunities to reduce transportation-related air pollution emissions and greenhouse gas emissions by engaging the public and private sectors in actions that accelerate advanced clean transportation technologies enhancing efforts to influence travel demand, and travel flow of transportation facilities through our traditional Transportation Demand Management strategies.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: 2016-2025
STATUS: In progress

Electric charging station in Tehachapi

Electric charging station in Bakersfield

Photo: Tehachapi News
PROJECT TITLE: Improvements to 51 Bus Stops – Metro Bakersfield/Disadvantaged Neighborhoods
PROJECT SPONSOR: City of Bakersfield, County of Kern, Golden Empire Transit District (GET), Kern Council of Governments and VOICED

PROJECT DESCRIPTION:
Through a partnership of the City of Bakersfield, County of Kern, Golden Empire Transit District (GET), and Kern COG, and VOICED, a coalition formed to build alliances with organizations that provide services to individuals with disabilities and their families, Bakersfield residents with disabilities have increased bus stop accessibility. Contributed funds through the partnership improved 51 bus stop locations that were identified and prioritized in Bakersfield. Additional locations are currently planned.

PROJECT BENEFITS:
Improvements to ADA ramps and sidewalks have improved access to the bus stop locations for the riders while improvements to the curb, gutter and pavement adjacent to the bus stops have improved access for the drivers.

COST BENEFIT RATIO: Not Applicable
TOTAL COST OF PROJECTS: $1,000,000
YEAR OF CONSTRUCTION: 2016
STATUS: In Progress

Photos: Golden Empire Transit

Press conference for bus stop accessibility

Installation of new bus stop
PROJECT TITLE: Taft Transit Center – Regional Transit Hub

PROJECT SPONSOR: City of Taft

PROJECT DESCRIPTION:
The City of Taft broke ground on the Taft Transit Center in November 2016. The location of the transit facility is along the Rails to Trails and Oilworker Monument. The design for the facility will preserve the historic theme of the Rails to Trails. The facility will not only be a transit center but will include a maintenance and office building and a community center. The facility’s expected completion is in Summer of 2017.

PROJECT BENEFITS:
This project is being funded by surplus Proposition 1B Transit funds. Residents of the cities of Taft and Maricopa will be sheltered from the summer heat and winter while waiting for Taft and Kern transit service. Due to its central location, this facility may encourage the use of Taft and Kern transit to local and visiting riders.

COST BENEFIT RATIO: $49.18/lb.
TOTAL COST OF PROJECTS: $1.9 million
YEAR OF CONSTRUCTION: 2016-17
STATUS: In progress
PROJECT TITLE: Early Delivery of Wasco Active Transportation Program Projects

PROJECT SPONSOR: City of Wasco

PROJECT DESCRIPTION:
The City of Wasco was awarded Active Transportation Program (ATP) funding during the first cycle of ATP. The projects included bike and pedestrian improvements for John L. Pruett Elementary School and Teresa Burke Elementary School; pedestrian improvements near Karl Clemens School and Palm Avenue Elementary School; and pedestrian safety lighting and pedestrian infrastructure along the Highway 43 corridor. These were some of the first ATP projects delivered in the State.

PROJECT BENEFITS:
There were significant benefits to the City of Wasco and its residents with the completion of these ATP projects. These included access to bike lanes, safe and walkable streets, lighting and landscaping along sidewalks, and safe routes to schools for students.

COST BENEFIT RATIO: Not Applicable
TOTAL COST OF PROJECTS: $3.6 million
YEAR OF CONSTRUCTION: 2014-2017
STATUS: Varies
PROJECT TITLE: Bakersfield Disadvantage Communities Bike Share & Bicycle Connectivity Project
PROJECT SPONSOR: City of Bakersfield

PROJECT DESCRIPTION:
In 2017 Kern COG awarded nearly one million dollars to the City of Bakersfield in regional share Active Transportation Program funds for a new bike share program and improvements to central Bakersfield. The program includes adding 19 miles of bike lanes; installing 80 bicycle parking and storage racks; and adding up to 25 stations with 180 dock ports for 100 smart bicycles. This pilot project may be expanded if proven successful.

PROJECT BENEFITS:
The City of Bakersfield’s implementation of this project will offer opportunities to reduce transportation-related air pollution emissions and greenhouse gas emissions by providing the public with more active transportation choices. The project benefits the largest concentration for disadvantage populations in the region, for a community with the second highest number of disadvantaged census tracts in the state. This project has tremendous potential to affect the health and access to jobs and services for these disadvantaged neighborhoods. The project is also expected to attract millennial job seekers.

COST BENEFIT RATIO:
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: 2016
STATUS: In progress

Bakersfield Bike Share Program
PROJECT TITLE: Kern Highway Projects Advancing Kern COG Complete Streets Recommendations
PROJECT SPONSOR: Kern Council of Governments

PROJECT DESCRIPTION:
In 2012 Kern COG completed the Complete Streets Recommendations report. Highway projects in Kern are implementing these recommendations. The Thomas Roads Improvement Program has now completed the following complete streets facilities:
- More than 21 miles of new bike lanes
- More than 18 miles of new sidewalks
- More than 120 new ADA curb cuts
- Three new interchanges with ramp metering

PROJECT BENEFITS:
These projects incorporate bike and pedestrian friendly facilities as well as facilities that promote carpools, vanpools and transit use through ramp metering. Surface streets are at grade, improving ease of bike and pedestrian flow.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: 2009-2021
STATUS: In Progress

Calloway Bridge, Westside Parkway
PROJECT TITLE: Kern Regional Active Transportation Plan Including Disadvantaged Communities
PROJECT SPONSOR: Kern Council of Governments

PROJECT DESCRIPTION:
Kern COG began the development of an Active Transportation Plan for the Kern region in July 2016 and completion date in June 2017. The Plan will inventory existing active transportation infrastructure, identify deficiencies in the system and prioritize the installation of new facilities that will improve system safety, connectivity and user convenience.

Golden Empire Transit, and the County of Kern’s Regional Transit the active transportation/public transit interface will be examined to improve transit opportunities to active transportation users.

COST BENEFIT RATIO: Not Applicable
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: 2017-2037
STATUS: In Progress

PROJECT BENEFITS:
With financial assistance from both the metropolitan Bakersfield public transit provider, Examples of obstructed sidewalk and sidewalk gap in Downtown Bakersfield
PROJECT TITLE: Kern Intelligent Transportation Systems Plan
PROJECT SPONSOR: Kern Council of Governments

PROJECT DESCRIPTION:
In 2017 Kern COG began the development of an update to the current Intelligent Transportation System (ITS) Infrastructure Plan. The plan proposes implementation of technology that improves the efficiency of the transportation system. An example of ITS infrastructure is traffic signal coordination.

PROJECT BENEFITS:
The ITS Plan provides for phasing in of new technologies that will improve the efficiency of the transportation system thereby reducing greenhouse gas and health based air pollution emissions.

COST BENEFIT RATIO: Not Applicable
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: 2017-2042
STATUS: In Progress

Examples of Intelligent Transportation Systems
DRAFT APPENDIX E – SUCCESS STORIES

PROJECT TITLE: SJV Rural Transit Shared Mobility Study for Disadvantaged Communities Implementation Alternatives for Meeting Transit Needs in the Rural San Joaquin Valley
PROJECT SPONSOR: Kern Council of Governments

PROJECT DESCRIPTION:
The 8-San Joaquin Valley COGs are partnering with the Institute of Transportation Studies at UC Davis and Michael Sigala to explore opportunities for leveraging new technology driven shared access services to enhance, compliment, and/or replace traditional fixed-route transit serving rural communities. The shared access services will study ridesharing, carsharing, and bikesharing.

PROJECT BENEFITS:
The partnership and project will expand low-carbon transportation options in rural areas and disadvantage communities.

COST BENEFIT RATIO: Unknown
COST OF PROJECTS: $600,000
YEAR OF CONSTRUCTION:
STATUS: In progress
PROJECT TITLE: SR 184 Lamont Bike and Pedestrian improvements
PROJECT SPONSOR: Caltrans

PROJECT DESCRIPTION:
Caltrans 18.5 mile project proposed to rehabilitate State Route 184 connecting the disadvantaged communities of SE Bakersfield, Lamont and Weedpatch. The project will widen the shoulders to standard widths, install a Class 2 bike lane, and upgrade existing nonstandard curb ramps. The project scope also includes Complete Street concepts.

The project will provide a safer route for pedestrians, and bike traffic along residential, commercial and institutional frontages and close a major bike and pedestrian facility gap in these disadvantaged community.

COST BENEFIT RATIO: Unknown
COST OF PROJECTS: $318,500
YEAR OF CONSTRUCTION: 2018
STATUS: Proposed
PROJECT TITLE: SR 184 and 155 Roundabouts in Disadvantage Communities of Delano and Weedpatch
PROJECT SPONSOR: Caltrans

PROJECT DESCRIPTION:
Caltrans project proposed a roundabout at the intersection of State Route (SR) 185 and Sunset Blvd, near the disadvantaged communities of Lamont and Weedpatch. This site benefits rural elementary school.

PROJECT BENEFITS:
The roundabout Lamont will improve safety and welfare of the traveling public and reduce the number and severity of collisions by accelerating the replacement of a 4-way stop. The roundabout will also have splitter islands, sidewalks, ramps and crosswalks for pedestrians.

COST BENEFIT RATIO: Unknown
COST OF PROJECTS: $3 million
YEAR OF CONSTRUCTION: 2019
STATUS: Proposed
PROJECT TITLE: Kern County General Plan Update – Land Use, Conservation, Open Space, Circulation, Housing, and other key elements

PROJECT SPONSOR: County of Kern

PROJECT DESCRIPTION:
In October 2016, the County of Kern kicked off the update to their General Plan. The General Plan update includes Land Use, Conservation, Open Space, Circulation, Housing, Water, Healthy Communities, Energy, Military Readiness, Safety and Noise Elements. The update process to the document that controls the resource land use areas of the county. The document will have to balance land uses and resources will providing a plan for disadvantaged unincorporated communities. The County already requires farmland lost to Solar requires 2-1 farmland preservation Easements.

PROJECT BENEFITS:
The plan when complete will advance the existing efforts to preserve Kern County resource areas for future generations while helping to reduce greenhouse gas production through alternative energy and ensuring water availability for the region’s agricultural carbon sink.

COST BENEFIT RATIO: Not Applicable
COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Not Applicable
STATUS: In progress
PROJECT TITLE: Early Deployment Pricing Policies for Parking and FastPass HOT Lanes
PROJECT SPONSOR: City of Bakersfield/Caltrans

PROJECT DESCRIPTION:
Parking Pricing - In 2016 the City of Bakersfield approved an increase in the parking cost at the city owned downtown parking structure, and downtown parking is being evaluated as part of the HSR Station Area Plan.

HOT Lanes Pricing - New FastPass lanes on I-5 and SR 14 are planned to be extended through Santa Clarita towards Kern County. These corridors are used by more than 10,000 Kern commuters per day and will likely benefit vehicle occupancy in Kern as well as Southern California. Interestingly, not many people commute from Kern. Over 90% of Kern workers both live and work in Kern County and most make occasional trips to Southern California.

PROJECT BENEFITS:
Parking toll lane pricing policies have proven to be an effective means to redistribute demand during peak periods, delaying the need for new infrastructure while providing a pay-as-you-go method to make improvements to the parking area or corridor. The reduced congestion benefits GHG and health based criteria pollutants.

COST BENEFIT RATIO: Not Applicable
COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Unknown
STATUS: In progress
PROJECT TITLE: City of Bakersfield Redevelopment Projects – Mill Creek and Baker Street
PROJECT SPONSOR: City of Bakersfield

PROJECT DESCRIPTION:
The Mill Creek Linear Project was a redevelopment project in Downtown Bakersfield, and included the renovation and redesign of Central Park. The Mill Creek Project includes a 1.5 mile linear park, housing, senior housing, and commercial developments, along with landscaping and street improvements, and has recently received a State AHSC grant for senior housing.

The Baker Street Village Project was also a redevelopment project that involved the revitalization of Olde Town Kern. The Project mixes condos and lofts, along with 10,000 square feet of commercial and community space.

PROJECT BENEFITS:
These two mixed-use redevelopment projects help reduce auto dependency, roadway congestion, and improve air quality. In addition, these projects promote pedestrian and bicycle travel, and promote efficient use of land and infrastructure.

COST BENEFIT RATIO: Not Applicable
COST OF PROJECTS: $58 million
YEAR OF CONSTRUCTION: 2007-2017
STATUS: In progress
PROJECT TITLE: Commuter Rail Feasibility Study/Amtrak Improvements
PROJECT SPONSOR: Kern Council of Governments

PROJECT DESCRIPTION:
Kern COG contracted with a consultant to develop a feasibility study for Federal Small Starts or New Starts program, and to determine alternative commuter bus and passenger rail service to replace or enhance the Amtrak San Joaquin passenger rail service between Bakersfield and Fresno once high-speed rail is implemented.

In 2016 Amtrak began operating a 7th train per day on this corridor, facilitating potential additional intercity stops on this passenger rail corridor in Kern.

High-speed rail trains begin to operate in six to eight years. If funding is available, strategies include:

- A possible commuter passenger rail service from Bakersfield to Delano with stops in northwest Bakersfield, Shafter, Wasco, and Delano.
- A possible commuter passenger rail service to rural employment sites such as Frito Lay, Grimmway, Bolthouse, etc.
- An extension of the Metrolink commuter passenger rail services from Palmdale to Rosamond.

COST BENEFIT RATIO: Unknown
COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION:
STATUS: In progress

Source: Commuter Rail Feasibility Study, Draft July 2012
PROJECT TITLE: Rideshare Program – Commute Kern
PROJECT SPONSOR: Kern Council of Governments

PROJECT DESCRIPTION:
Commute Kern provides customer service upon request from the general public, employers, colleges, vanpool operators, other agencies and the media regarding ridesharing opportunities. As an on-line transportation demand management program, Commute Kern’s website-commutekern.org, serves as a resource for carpooling, vanpooling, public transit, park-and-ride facility use, telework, walking and bicycling for commutes to work and school to help improve our air quality. The program also allows for flexible scheduling, daily tracking, vanpool management, outreach to employers, resources to commuters such as concierge services, and forum for discussion and sharing resources.

PROJECT BENEFITS:
Using rideshare services reduces the number of single occupancy vehicles on the road, and ultimately helps to improve our air quality.

COST BENEFIT RATIO:
2017-2018: $59.15 / lbs.

COST OF PROJECT:
2016-2017: $231,420
2017-2018: $243,886

YEAR OF CONSTRUCTION: Non-construction
STATUS: Ongoing
PROJECT TITLE: Expanding Park and Ride Lots
PROJECT SPONSOR: Caltrans, City of Bakersfield and California City

PROJECT DESCRIPTION:
The purpose of the development of Park and Ride lots is to provide a safe and centralized location for commuters to meet and either carpool, vanpool, or use transit. There are seven existing Park and Rides within Kern County that Caltrans (Districts 6 and 9) operates. There are lots in Lake Isabella, Delano, Taft, Ridgecrest, and three in Bakersfield.

The newest Park and Ride location was created through a partnership with Tejon Ranch, GET Bus, and IKEA Industrial Plaza. A bus picks up and drops off the Industrial Plaza employees from the newest park and ride lot at South H Street and McKee Road.

An addition proposed project is the construction of College Station Park and Ride with a bus turnout at the intersection of California City Blvd. (South) and Yale Ave in California City. The primary purpose of the project is to provide a place to park and car/van pool for those working at the Borax Plant in Boron, and Edwards Air Force base.

PROJECT BENEFITS:
Provides a meeting point for commuters to leave their individual cars as they join carpools or vanpool services. This service helps eliminate the number of single occupied vehicles from the roads on a daily basis.

In addition, the proposed project is anticipated to reduce the number of vehicle trips for those who will car or van pool to work. Using the latest emission factors, it is estimated that this project would remove between 865 and 1,100 pounds of emissions annually over a twenty year life expectancy.

COST BENEFIT RATIO: $23 / lbs.
COST OF PROJECT: $375,000
YEAR OF CONSTRUCTION: 2014
STATUS: Complete

Park and Ride lot at South H Street and McKee Road

Map of Park & Ride Lots in Kern County
PROJECT TITLE: Dial-A-Ride and Local Transportation Services
PROJECT SPONSOR: City of Arvin, California City, City of Delano, City of McFarland, City of Ridgecrest, City of Shafter, City of Taft, City of Tehachapi, City of Wasco, City of Bakersfield (GET)

PROJECT DESCRIPTION:
The following cities provide Dial-A-Ride service to the public within their city limits: Arvin, California City, Delano, McFarland, Ridgecrest, Shafter, Taft, Tehachapi, and Wasco. The Dial-A-Ride services vary from city to city; some cities provide services to all the public while some limit services to seniors and the disabled. In addition, Bakersfield through Golden Empire Transit (GET) provides the GET-A-Lift service to eligible persons. Dial-A-Ride service within the Bakersfield urban area is also provided by the Consolidated Transportation Service Agency (CTSA).

Kern COG is part of a study with UC Davis on shared mobility for rural transit that may of solutions to enhance transit service in rural, disadvantaged communities.

PROJECT BENEFITS:
The Dial-A-Ride service is a form of ridesharing that benefits the Kern region by reducing the number of single occupancy vehicles on the road which ultimately helps improve our air quality.

COST BENEFIT RATIO: Not Applicable
COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION:
STATUS: In progress
PROJECT TITLE: Kern County Bicycle Master Plan and Complete Streets Recommendations / City of Tehachapi Master Bike Plan
PROJECT SPONSOR: Kern Council of Governments / City of Tehachapi

PROJECT DESCRIPTION:
The Kern County Bicycle Master Plan and Complete Streets Recommendations proposed 664 miles of new bikeways, including 30 miles of Class I bike paths, 297 miles of Class II bike lanes, 46.6 miles of Class III bike routes, and 186 miles of Class II bike routes on State Routes. In addition, the Plan also presents recommendations for complete streets.

The City of Tehachapi Master Bike Plan proposed 31.69 total miles of bikeways, including 4.66 miles of Class I Bike Paths and 25.24 miles of Class II bike lanes.

PROJECT BENEFITS:
Replacing vehicular trips with bicycle trips can reduce human-generated GHGs in the atmosphere, reduce VMT, reduce fuel consumption and lessen mobile source pollutants, such as carbon dioxide being released into the air.

COST BENEFIT RATIO: Unknown
COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Unknown
STATUS: Kern County Final Plan will be issued in September 2012 and the City of Tehachapi Master Bike Plan was adopted in June 2012.

Map of Proposed Bicycle Facilities in Kern County
PROJECT TITLE: City of Bakersfield Bicycle Facilities
PROJECT SPONSOR: City of Bakersfield Public Works Department

PROJECT DESCRIPTION:
These projects relate to bicycle facilities at numerous locations within the City of Bakersfield. There were a total of two proposed bicycle facilities projects (total of eight proposed lanes) for the Fiscal years of 2012-2013. Both projects proposed the installation of Class 2 bicycle lanes along each corridor including pavement striping, markings and roadway signage. The map also includes the existing bicycle facilities.

PROJECT BENEFITS:
On-street bike lanes (Class 2) along major roadways help raise bicycle usage resulting in lower emissions and congestion, while resolving safety issues.

COST BENEFIT RATIO: $7 – $21/lbs
TOTAL COST OF PROJECTS: $35,000 - $60,000
YEAR OF CONSTRUCTION: 2013
STATUS: Constructed, Planned

Map of Bicycle Lanes
PROJECT TITLE: Westside Station – Multi-modal Transit Center
PROJECT SPONSOR: California City

PROJECT DESCRIPTION:
The completed project provides the eastern Kern region with a multi-modal transit center on City owned property in the Wonder Acres neighborhood at the southwest corner of California City Blvd. and Wonder Ave. The Transit Center includes a parking lot, lighting, restrooms, landscaping, and Kern Regional Transit bus stops.

The purpose of this project is to provide a comfortable, accessible, and a safe place to park that encourages residents who were parking at the previously undeveloped site to commute to work or school using car pools, ride sharing or public transit.

Westside Station – Multi-modal Transit Center, California City

PROJECT BENEFITS:
Improves site accessibility to local area residents desiring to use van pools, ride sharing and public transit throughout the Kern region. Encourages future users of alternative transportation options.

COST BENEFIT RATIO: All emissions: $8.34/lbs.
COST OF PROJECT: Approximately $500,000
YEAR OF CONSTRUCTION: Completed in 2013
STATUS: Constructed
PROJECT TITLE: San Joaquin Valley Vanpool Program (CalVans)
PROJECT SPONSOR: CalVans

PROJECT DESCRIPTION:
The San Joaquin Valley vanpool program (CalVans) is a public vanpool service that serves Central California and began serving Kern County residents in 2009. CalVans provides public transit services to people in transportation uses that are difficult for traditional public transit operators to provide. CalVans currently provides transportation services to farmworkers throughout the county and has also provided services to Shafter students attending Taft Community College. In 2016, CalVans added vanpools going to Tehachapi. There are now 28 vanpools operating in Kern.

PROJECT BENEFITS:
CalVans provides a higher level of vanpooling while reducing overall miles traveled and carbon dioxide emissions from passenger vehicles.

CalVans provides 7, 8, and 15-passenger vans to its customers. Currently CalVans has over 495 vanpools in operation which in turn saves nearly 13,000 vehicle miles traveled per day. Growing demands project a market for nearly 500 vans pools which can save approximately 100,000 vehicle miles traveled per day.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS:
YEAR OF CONSTRUCTION: 2009
STATUS: In process

Local college students who use CalVans
PROJECT TITLE: Kern County Wind Farm Areas (Largest in the U.S.)
PROJECT SPONSOR: County of Kern

PROJECT DESCRIPTION:
The County of Kern has 21,752 acres of existing wind energy areas, 57,524 acres of approved wind projects and 14,998 acres of wind projects that are in progress.

PROJECT BENEFITS:
Wind is a clean source of renewable energy that produces no air pollution. In addition, wind turbines create power without producing greenhouse gases.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Unknown
STATUS: In process
APPENDIX E – SUCCESS STORIES

PROJECT TITLE: City of Shafter Container Yard and Intermodal Rail Facility Expansion
PROJECT SPONSOR: City of Shafter

PROJECT DESCRIPTION:
The City of Shafter Intermodal Rail Facility was recently expanded by adding 2 miles of tail sidings and a container storage yard. The rail facility will establish a dedicated reliable intra-state rail shuttle connecting the Port of Oakland and Los Angeles/Long Beach with the southern San Joaquin Valley. The container yard is leased by a dock operating company for Los Angeles/Long Beach and Oakland and uses the facility to help match loads between the ports and the southern San Joaquin Valley so as to eliminate emissions and truck trips.

PROJECT BENEFITS:
The rail shuttle will better utilize existing port facilities, highways, and rail infrastructures in California to reduce the relocation of empty containers, remove trucks from overcrowded highways, and improve air quality. The proposal is to create an intermodal facility which will divert the freight transported by 600 trucks per day to 2 unit trains per day to and from the Port of Oakland.

COST BENEFIT RATIO: $99 / lbs.
TOTAL COST OF PROJECTS: $60 million
YEAR OF CONSTRUCTION: 2013
STATUS: In process

Proposed Shafter Intermodal Rail Facility Expansion

Container Yard
APPENDIX E – SUCCESS STORIES

PROJECT TITLE: Next Generation Intersection Signalization
PROJECT SPONSOR: City of Bakersfield Public Works, Kern County Roads Department, City of Ridgecrest, Caltrans

PROJECT DESCRIPTION:
Existing and proposed intersection signalization projects at numerous locations throughout the Kern region. A total of 13 intersection signalization proposed projects have been scheduled for the Fiscal years of 2012-2014.

In 2016 Kern COG commenced an update to the Intelligent Transportation System (ITS) Plan that will look at the next generation of traffic signal technology.

PROJECT BENEFITS:
Improves signal timing along the reference corridor which will reduce overall vehicle stops and starts, and limits delay in travel time. The reduction in vehicle stops and starts will improve the corridor’s average speed, thereby reducing the harmful pollutants generated by vehicles traveling at low speeds and when idling.

COST BENEFIT RATIO: $3 – $60/ lbs.
TOTAL COST OF PROJECT:
$104,500 - $652,500
STATUS: Constructed/Operating, Planned

Proposed Intersection Signalization Projects

2018 Regional Transportation Plan (RTP) Sustainable Communities Strategy (SCS) Kern Council of Governments (Kern COG) June 2018

E-26

1401 19th Street, Suite 300, Bakersfield, California 93301
The source of specific funding and Kern COG are not responsible for any misuse or misinformation contained in the report.
PROJECT TITLE: City of Bakersfield 4 New Downtown Infill Housing Projects – Mill Creek South, 1612 City Lofts, 17th Place Townhouses, AHSC Senior Housing Project at Mill Creek
PROJECT SPONSOR: City of Bakersfield

PROJECT DESCRIPTION:
South Mill Creek Apartments was developed and operates with Federal housing financing. The property utilizes the Low Income Housing Tax Credit Federal housing program to make rent affordable to lower income tenants.

1612 City Lofts (The Lofts) is a mixed use development located in the thriving Downtown Bakersfield Arts and Entertainment District or popularly known as “The District.” 1612 City Lofts became the first mixed-use building in downtown Bakersfield in the 21st century. The Lofts also provide a workforce housing as part of a program through the Bakersfield Economic Redevelopment Agency. Tenants income limits are adjusted annually.

17th Place Townhomes is an environmentally friendly downtown community walking distance from downtown amenities. The luxury development townhomes will include drought-sensitive landscaping and courtyard space.

AHSC Senior Housing Project at Mill Creek provides affordable one and two-bedroom apartment homes for seniors 55 years and older. The Mill Creek Village will be coming in early 2017 and includes private patios or balconies and a central courtyard.

PROJECT BENEFITS:
The infill housing projects are conveniently located to public transportation that includes the Amtrak Station and Bakersfield Downtown Transit Center. The housing projects are also within walking distance of downtown shopping and dining.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Varied
STATUS: In Progress
DRAFT APPENDIX E – SUCCESS STORIES

PROJECT TITLE: Cities of McFarland and Shafter – Conversion of transit fleet to electric vehicles
PROJECT SPONSOR: City of McFarland, City of Shafter

PROJECT DESCRIPTION:
The City of Shafter introduced four electric vans for use in its Dial-A-Ride program. Each van is configured to carry up to 16 passengers or cargo at 100 miles per charge. The City of McFarland is in the process of converting their transit fleet to electric vehicles.

PROJECT BENEFITS:
The benefits of transit electric vehicles includes the reduction of the number of single occupancy vehicles on the road and ultimately helps improve our air quality, lower maintenance and repair costs, and lower fuel costs.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: 2016
STATUS: In Progress

Shafter Electric Vehicles
PROJECT TITLE: Golden Empire Transit/Kern Transit – Purchase of 4 Electric Buses

PROJECT SPONSOR: Golden Empire Transit District, Kern Transit

PROJECT DESCRIPTION:
The Golden Empire Transit District will be purchasing 2 electric buses in 2017. Clean non-polluting buses may attract more riders who may be looking to alternatives to the auto for home to work purposes. These electric buses are planned to be used for the future bus rapid transit route in Bakersfield.

Kern Transit was recently awarded a grant to purchase 2 electric busses for its east Kern run to the Metrolink station in Lancaster.

PROJECT BENEFITS:
As fleets increase, rapid routes may make commuter travel preferable. This improves preferences and accessibility to medical, shopping centers and employment centers.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: 2017
STATUS: In Progress

Electric buses being driven in Bakersfield

Kern Transit Bus at Intermodal Rail Stop
PROJECT TITLE: Lost Hills Wonderful Park and Communitywide Improvements
PROJECT SPONSOR: The Wonderful Company

PROJECT DESCRIPTION:
The Lost Hills Wonderful Park is located at the intersection of Highway 46 and Lost Hills Road. The park was part of Lynda Resnick, co-chair of The Wonderful Company, Central Valley Leadership Project. Phase I of the project involved major park improvements including resurfaced basketball court, soccer field, bleachers, and a mile-long walking path that circles the park, a splash park, and solar powered lights to illuminate the park in the evening. The community center located in the park was also completely renovated to include a fully equipped kitchen, tables and chairs for community and private events. Phase II of the project renovation included widening of streets and addition of bike lanes; installation of sidewalks, gutters, bus stop shelters and street lights; and the planting of drought-resistant landscaping.

Company, improved 3.8 miles of streets, built 7.2 miles of sidewalk, extended 220 driveways and installed 6.9 miles of curbs and gutters. In addition, the Wonderful Company planted 730 trees, put up 16 stop signs, erected 38 LED street lights and built 1,400 feet of 60-foot-wide pedestrian walkways. Residents of Lost Hills can safely walk, ride their bike, or drive to the Park. Directly across from the Park is a bus shelter for the regional transit, Kern Transit. The Wonderful Company, the County and Caltrans are developing a pedestrian overpass on SR 43 for the community.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: 2019
STATUS: Completed

PROJECT BENEFITS:
The Wonderful Company made major street improvements in the community. The Wonderful
PROJECT TITLE: New Developments Innovative Green Tech
PROJECT SPONSOR: County of Kern, City of Bakersfield

PROJECT DESCRIPTION:
Newly approved developments such as Grapevine leverage new technologies to provide the lowest carbon footprint, sustainable education, and housing options closer to jobs in the region. In December, 2016, Kern County approved the Tejon Ranch Company’s Grapevine Community Plan which is strategically located on 8,010 acres adjacent to the Tejon Ranch Commerce Center on both sides of Interstate 5 near its junction with Highway 99 in the southern San Joaquin Valley. The Tejon Ranch Commerce Center has transformed the vehicle traffic traveling the freeways into a greater asset for Kern County, resulting in the creation of 5 million square feet of commercial and logistics uses and 4,000 associated jobs.

PROJECT BENEFITS:
Reduction in vehicle miles traveled and a reduction in the overall per capita carbon footprint. Importantly, the Grapevine development will be guided by Sustainability Principles that reduce GHG emissions through implementation of an emission reduction agreement, Transportation Management Association programs and design elements that employ renewable energy technology, water conservation measures, alternative fuels technology for vehicle fleets and provision for electric charging stations.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Unknown
STATUS: In Progress

Reference: http://www.grapevineattejonranch.com/
PROJECT TITLE: City of Tehachapi General Plan – Form Based Code General Plan
PROJECT SPONSOR: City of Tehachapi

PROJECT DESCRIPTION:
The City of Tehachapi adopted the 2035 General Plan Update, and the new General Plan will contribute towards the implementation of SB 375.

The new General Plan can be characterized as a Form Based General Plan because it emphasizes facilitating mixed use, walkable neighborhoods and developments. The "T" Zone will facilitate high density mixed use development opportunities. The Mobility Element is still linked to the Land Use Element with an emphasis on greater connectivity, walkability, and opportunities for mixed use developments. The "G" Sectors will reinforce the preservation of the Sphere of Influence area as open space, prevent urban sprawl and maintain our compact urban form. The "G" Sectors will emphasize infill development as our highest priority as the General Plan continues to build out.

PROJECT BENEFITS:
The new General Plan will maintain a compact urban form by maintaining all areas outside of the current City limits and within the sphere of influence area as Open Space. This approach will prevent urban sprawl, protect important agricultural resources and provide a clear line of demarcation between town and countryside.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Unknown
STATUS: In Progress

Reference: City of Tehachapi General Plan, 2012

The Walkable Neighborhood example

The Conceptual Transect System
PROJECT TITLE: Infill Incentive Zone – Lower Transportation Impact Fee Core Area
PROJECT SPONSOR: City of Bakersfield / City of Tehachapi

PROJECT DESCRIPTION:
The Transportation Impact Fee (TIF) Core Area is a designated area within Metro Bakersfield that has been identified through the City’s Land Use policies as an area where development is encouraged. Developers who plan projects in the TIF Area will have reduced permitting fees. The TIF Core Area would allow an increase of approximately four times the number of households that are currently in this area.

The City of Tehachapi also has implemented a Tehachapi Region Core Area TIF. Tehachapi’s TIF is established for the similar purposes as Bakersfield’s TIF.

PROJECT BENEFITS:
Implementing incentives for development in the TIF Core Area can promote infill, mixed-use, and discourage sprawl. Future development in the TIF Core Area will also bring the public closer to quality transit service.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: n.a.
STATUS: In process

Map of TIF Core Area for Bakersfield
**PROJECT TITLE:** City of Taft General Plan – Sustainability Principles  
**PROJECT SPONSOR:** City of Taft

**PROJECT DESCRIPTION:**  
The City of Taft’s General Plan incorporates sustainable principles throughout the elements of the General Plan. The City’s principle involves the three aspects of sustainability: environment, economy, and equity. Throughout the General Plan, there is a leaf symbol adjacent to goals and policies based on the sustainable or “green” principles.

The City of Taft’s General Plan promotes the development of a sustainable community by ensuring its general plan policies are crafted to cut greenhouse gas emissions and move toward cleaner energy sources.

**COST BENEFIT RATIO:** Unknown  
**TOTAL COST OF PROJECTS:** Not Applicable  
**YEAR OF CONSTRUCTION:** Not Applicable  
**STATUS:** In Progress

**Reference:** City of Taft General Plan, 2009

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<td>Promote infill development</td>
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<td>Protect open space and greenbelts</td>
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<td>Protect the efficiency of energy and resources (water, soil, building materials, etc.)</td>
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<td>Promote energy and resource efficient buildings</td>
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<td>Promote economic opportunities for all segments of the community</td>
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<td>Enhance the design character of commercial and urban development</td>
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<td>Provide adequate housing for all income levels</td>
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<td>Provide a fair and predictable land use planning process</td>
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<td>Promote development that is compatible to terms of living, work, and leisure among all Taft residents and businesses</td>
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<td>Require the implementation of development, adoption, and enforcement of regulations and policies</td>
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<td>Promote alternative transportation options to increase access</td>
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2018 Regional Transportation Plan (RTP)  
Kern Council of Governments (Kern COG)  
Sustainable Communities Strategy (SCS)  
June 2018

The source of specific funding and Kern COG are not responsible for any misuse or misinformation contained in the report.
PROJECT TITLE: City of Ridgecrest General Plan and Multi-Modal Circulation Element
PROJECT SPONSOR: City of Ridgecrest

PROJECT DESCRIPTION:
In 2009, the City of Ridgecrest adopted its most recent General Plan. The guiding principles that are included in the updated general plan are: explore land use and policy alternatives; provide guidance in the planning and evaluation of future land and resource decisions; and provide a vision and framework for the future growth of the City. In addition, the Circulation Element addresses automobile travel, public transit, aviation, and trails for bicyclists and pedestrians.

PROJECT BENEFITS:
The City of Ridgecrest's updated General Plan includes new goals, policies, and implementation measures that are sustainable approaches. A new Land Use goal in the City's General Plan is to provide an appropriate mix of land use opportunities and provide incentives for infill development. In addition, the Circulation Element includes a goal to encourage and provide alternative modes of transportation and alternatives to travel for Ridgecrest residents to decrease dependence on single-occupant vehicular travel and reduce vehicle emissions.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Not Applicable
YEAR OF CONSTRUCTION: Not Applicable
STATUS: In Progress

Reference: City of Ridgecrest General Plan, 2009

PROJECT TITLE: General Plan Sewer Policy – Hook-up required for parcels less than 6 acres
PROJECT SPONSOR: County of Kern

PROJECT DESCRIPTION:
In November 2005, the Kern County Board of Supervisors approved revisions to the Metropolitan Bakersfield General Plan including its sewer policy. The revisions required all new commercial, industrial and residential developments including residential land divisions proposing parcels smaller than six gross acres to connect to public sewer.

PROJECT BENEFITS:
The policy is intended to ensure that new growth be based on the availability of the extension of sewer infrastructure. The policy greatly curtails large lot development on the periphery of Metro Bakersfield.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Unknown
STATUS: In process

Map of Sewer Area in Metro Bakersfield
PROJECT TITLE: City of Bakersfield Required Lot Size Zoning Strategies
PROJECT SPONSOR: City of Bakersfield

PROJECT DESCRIPTION:
In January 2005, the City of Bakersfield amended Section 17.14.070 of the Municipal Code relating to minimum lot area zoning. The amendment reduced the minimum lot size for R-2 zone dwellings to four thousand five hundred square feet per dwelling unit.

The City of Bakersfield also has a Planned Unit Development (PUD) zone, which enables developers to propose any lot size they desire, subject to discretionary approval by either the Council or Planning Commission. An example of a project that achieved higher density in a single-family residential development is University Park located in southwest Bakersfield.

The housing project includes a mixture of small, but traditional lots as well as cluster lots where six lots share a single driveway. In addition, the City has the Commercial-Center (C-C) zone which permits mixed use development by-right.

PROJECT BENEFITS:
Building on smaller lot sizes allows for compact and sustainable development. Planning and implementing compact sustainable development provides opportunities to reduce greenhouse gas emissions.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Ordinance implemented in 1995
STATUS: In process

Map of Small Lot Areas in Metro Bakersfield
PROJECT TITLE: San Joaquin Valley Air Pollution Control District – Indirect Source Review (ISR) to Mitigate Off-Site Air Quality Impacts of New Development

PROJECT SPONSOR: San Joaquin Valley Air Pollution Control District (SJVAPCD)

PROJECT DESCRIPTION:
The SJVAPCD adopted Indirect Source Review (Rule 9510) to reduce the impacts of growth in emissions from all new land development in the San Joaquin Valley. Indirect air emissions are emissions indirectly caused by growth in population. ISR applies to development projects that have not yet gained discretionary approval.

PROJECT BENEFITS:
The ISR Rule looks to reduce the emission of harmful pollutants, specifically NOx and PM10 associated with the construction and operation of new development projects in the San Joaquin Valley.

COST BENEFIT RATIO: Unknown
COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Unknown
STATUS: Adopted

Examples of Smart Growth Development Located in Downtown Bakersfield
PROJECT TITLE: Transit Priority Areas (TPA)
PROJECT SPONSOR: Kern Council of Governments

PROJECT DESCRIPTION:
SB 375 addresses Transit Priority Areas (TPA) as part of the SCS. TPA are areas within ¼-mile of either rail stations or bus services with 15 minute headways in the peak period. The current TPA only includes the Amtrak stations with a total population of 5,628 within the TPA. In October 2012, the GET Short Term Transit Plan will implement their 2012 plan which will increase the TPA coverage to 26.40 square miles and include a household population of 127,022 within the TPA. With the implementation of the GET Long Range Plan by 2035, the TPA coverage will increase 87.58 square miles and include a household population of 415,431. The TPA difference from existing and 2035 is a 5,478.3% increase in the TPA coverage and a household population of 7,281.5%.

PROJECT BENEFITS:
TPA encourages sustainable development by providing accessibility to quality transit which can reduce vehicle miles traveled and reduce the region’s GHG.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECT: Unknown
YEAR OF CONSTRUCTION: October 2012
STATUS: Planned
PROJECT TITLE: Metropolitan Bakersfield General Plan Centers Concept – Transit Priority & Strategic Employment Place Types
PROJECT SPONSOR: Kern Council of Governments

PROJECT DESCRIPTION:
Below is a map based on the Metro Bakersfield General Plan Centers Concept that was adopted in 1992. The Centers Concept was incorporated into the 2008 Kern Regional Blueprint Conceptual View maps. These map series were designed to illustrate some of the Regional Blueprint Principles designed to promote sustainable communities. The Maps are distinguished in phases; resources and other layers, existing, planned, and potential centers, along with a map that combines all the phase layers. The Maps include City spheres of influence from the County General Plan (included in the Public/Resources layer), the transportation model network, and the major transit routes.

PROJECT BENEFITS:
Transit Priority Centers and Strategic Employment Place Types are illustrated in three phases; existing, planned, and potential. The Planned and Potential centers are located along major transit services within the urban area.

COST BENEFIT RATIO: Unknown
COST OF PROJECTS: N/A
YEAR OF CONSTRUCTION: N/A
STATUS: Adopted
PROJECT TITLE: GET - Short-Term Service Plan (2012-2020)
PROJECT SPONSOR: Golden Empire Transit District (GET)

PROJECT DESCRIPTION:
In the Metropolitan Bakersfield Transit System Long-Range Plan, there is a proposed Short-Term Service Plan (2012-2020). In the Short-Term plan, GET’s fixed-route bus network would be reconfigured to reflect population and employment growth since the 1980’s and to improve customer service and cost-effectiveness. In addition, the area covered within .75 miles from the Short-Term transit routes is 111 square miles.

PROJECT BENEFITS:
The prominent features of the Short-Term Plan includes a new transit center at CSU Bakersfield, increased service to CSU Bakersfield and Bakersfield College, faster cross-town trips, and decreased emphasis on timed connections at transit centers. The public will have more access to quality transit which will influence more people to use public transportation.

COST BENEFIT RATIO: -
TOTAL COST OF PROJECT: -
YEAR OF CONSTRUCTION: -
STATUS: Planned

Reference: Metropolitan Bakersfield Transit System Long-Range Plan, April 2012

Short Term Service Plan (2012-2020)

FIGURE 5-1: MAP OF PROPOSED GET FIXED-ROUTE (SHORT-TERM)
APPENDIX E – SUCCESS STORIES

PROJECT TITLE: GET X-92 Commuter Express bus service to Tejon Industrial Complex
PROJECT SPONSOR: Golden Empire Transit District (GET)

PROJECT DESCRIPTION:
Since 2008, GET has been using federal and local funds to provide a round-trip commuter express bus service that begins at 22nd Street and Eye Street, travels to a Park and Ride facility at McKee Road, and then terminates at the Tejon Industrial Complex (TIC). The purpose of this service is to provide employees of the TIC an efficient, inexpensive commuter alternative to driving to work in their own car. Service is also provided to the Tejon Outlets.

GET staff has worked closely with the employers at TIC to ensure the X-92 Route arrivals and departures match the work schedules as much as possible. GET currently offers nine round-trip schedules beginning at 3:50 a.m. and ending as late as 12:10 a.m. to accommodate as many TIC employers/employees as possible. Approximately 19,000 employees per year use the X-92. A 31-day pass for the service currently costs $55; a significant value given the fluctuation of today’s fuel prices!

PROJECT BENEFITS:
The X-92 Route provides the benefits below:

- Lowers employee driving costs such as general vehicle wear and tear, oil changes, fuel costs, etc.
- Allows for TIC employers to offer fare subsidies to meet SB 375 requirements.
- Reduces the number of single occupancy vehicle trips.
- Reduces vehicle emissions throughout metro-Bakersfield and the surrounding rural area.

COST BENEFIT RATIO: 29% (FY 2015-2016)
COST OF PROJECTS: $361,767 (FY 2015-2016)
YEAR OF CONSTRUCTION: 
STATUS: In progress
PROJECT TITLE: Kern 511
PROJECT SPONSOR: Kern Council of Governments

PROJECT DESCRIPTION:
Establish a 511 Traveler Information System in Kern County. The Kern 511 System will include a website and an Interactive Voice Recognition System (IVR).

The purpose of this project is to provide real-time information to the traveling public to improve traffic flow and safety on highways throughout Kern County.

PROJECT BENEFITS:
Provides traveler information including traffic speeds, traffic alerts, transit services, carpool information, and trip planning.

COST BENEFIT RATIO: Unknown
COST OF PROJECT: $773,762
YEAR ESTABLISHED: 2012
STATUS: In Process

Kern County 511 Website
APPENDIX E – SUCCESS STORIES

PROJECT TITLE: San Joaquin Valley Blueprint Integration Project
PROJECT SPONSOR: San Joaquin Valley Blueprint

PROJECT DESCRIPTION:
The San Joaquin Valley Blueprint Integration Project is a valley-wide program to provide support to cities in the valley whose population is under 50,000. The Project integrates Blueprint Smart Growth principles into the cities’ General Plan and planning policies. A team of planning consultants will serve as Circuit Planners and will provide hands-on support to local agencies to integrate the appropriate Blueprint principles into local planning programs.

Within Kern County, the following small cities are involved in the Project and will be integrating the corresponding Blueprint Integration (BPI) tool:

- Ridgecrest – Sign Ordinance
- Wasco – Design guidelines SR 46 Corridor
- Arvin – Design guidelines
- Shafter – Strategy to link transportation/land use
- California City – Infill strategy
- McFarland – Ag mitigation program
- Tehachapi – Climate Action Plan Guidance
- Taft – Zoning Ordinance audit tool

PROJECT BENEFITS:
The SJV Blueprint Integration Project assists in implementing the 12 Blueprint Smart Growth Principles. The Principles include creating walkable neighborhoods, mixing land uses, and providing a variety of transportation choices.

COST BENEFIT RATIO: Unknown
COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Unknown
STATUS: In progress
PROJECT TITLE: Caltrans Detection Systems - State Route 43 Intersection Improvements and East Bakersfield Vehicle Detection Systems
PROJECT SPONSOR: Caltrans

PROJECT DESCRIPTION:
The SR 43 Intersection Improvements in Shafter installed vehicle detection systems (loops, vehicle signal heads, conduit and connectors) and new signal controllers with GPS clocks to reduce traffic congestion and improve operations at the following intersections of SR 43: Lerdo Hwy, Shafter Ave, Central Ave and Kimbertina Rd.

The East Bakersfield Vehicle Detection Systems proposed project will install vehicle detection systems in order to reduce traffic congestion and maximize efficiency of existing highways. The system will be on State Route 58 through the City of Bakersfield from Real Road to Vineyard Street at various locations. The system may be traditional loops installed in roadways or microwave radar detection systems.

PROJECT BENEFITS:
The system will provide travelers with real time information to make decisions to choose alternate routes for more efficient travel. These efficiencies will also help to improve air quality.

COST BENEFIT RATIO: All emissions – $7.00 - $21.00 / lbs.
COST OF PROJECTS: $1,038,000
YEAR OF CONSTRUCTION: 2010, 2012
STATUS: Operating, In Construction
APPENDIX E – SUCCESS STORIES

PROJECT TITLE: California Highway Patrol's Safety Corridors
PROJECT SPONSOR: California Highway Patrol

PROJECT DESCRIPTION:
The California Highway Patrol (CHP) has received funds from the Office of Traffic Safety (OTS) to establish task forces comprised of representatives from city, county, regional, state, and federal government agencies, and the private sector. The mission of each task force is to assess a high collision highway or pedestrian corridor, and make recommendations to improve traffic safety on the roadways of interest.

PROJECT BENEFITS:
With the increased CHP presence along these highway safety corridors, drivers will be more sensible of their driving habits. Sensible driving and observing the speed limits can impact fuel efficiency and have a fuel economy benefit of 5% to 33% (fueleconomy.gov). Fuel efficiency can reduce CO2 emissions through reducing the burning of gasoline and diesel.

COST BENEFIT RATIO: Unknown
COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Started in 2002
STATUS: In progress

Map of Safety Corridors in Kern County
PROJECT TITLE: Purchase of CNG Buses
PROJECT SPONSOR: Golden Empire Transit District, County of Kern Roads/Kern Regional Transit

PROJECT DESCRIPTION:
Purchasing and replacing CNG buses for Golden Empire Transit (GET) and Kern Regional Transit (KRT). There are three proposed projects that relate to the acquisition of CNG buses for Fiscal Years 2012-2014.
The purpose of these projects is to invest in alternate fuel fleets which promote the reduction of automobile trips, while also reducing the emission of harmful pollutants.

PROJECT BENEFITS:
Increasing the available capacity for passengers will encourage the public not to drive their own vehicles and decrease the number of buses for services that will reduce fleet emission levels.

COST BENEFIT RATIO: $ 34+ / lbs.
COST OF PROJECTS: $400,000 - $575,000 per bus
YEAR OF CONSTRUCTION: 2013-2014
STATUS: Planned
APPENDIX E – SUCCESS STORIES

PROJECT TITLE: The Electric Cab Company of Delano
PROJECT SPONSOR: The Electric Cab Corporation and Private Organization

PROJECT DESCRIPTION:
The Electric Cab Company of Delano is a business organization founded in the City of Delano. The company currently provides local transportation services to the community members of Delano.

PROJECT BENEFITS:
The Electric Cab Company provides alternative transportation services to the community of Delano by using electric vehicles which reduce the emission of harmful air pollutants.

COST BENEFIT RATIO: Unknown
COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: 2012
STATUS: In progress

http://www.theelectriccab.com/

Images of Electric Cab Company's electric vehicles

Photos from: http://www.theelectriccab.com/

2018 Regional Transportation Plan (RTP) Sustainable Communities Strategy (SCS) 
Kern Council of Governments (Kern COG) June 2018
1401 19th Street, Suite 300, Bakersfield, California 93301
The source of specific funding and Kern COG are not responsible for any misuse or misinformation contained in the report.
PROJECT TITLE: Downtown Elementary School (City of Bakersfield)
PROJECT SPONSOR: Bakersfield City School District

PROJECT DESCRIPTION: Downtown Elementary School is located in the City of Bakersfield's Downtown. The school serves K-8 students and provides extended day programs where the school day is extended before and after school to accommodate working parents. Downtown Elementary was recently expanded to accommodate more students.

PROJECT BENEFITS: Downtown Elementary was designed to support families of the employees working in the downtown area.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: Unknown
STATUS: In process
APPENDIX E – SUCCESS STORIES

PROJECT TITLE: Traffic Control Devices
PROJECT SPONSOR: City of Bakersfield

PROJECT DESCRIPTION:
Implements traffic control devices at numerous locations within the City of Bakersfield. There were a total of four proposed traffic control device projects (total of nine monitoring cameras) for the Fiscal years of 2012-2014.

The purpose of these projects is to improve traffic flow and safety through better signal timing and accident detection through main corridors. The cameras will be controlled and monitored from the City’s Traffic Operation Center (TOC), and changes to signal time can be made through the City’s existing signal communication system.

PROJECT BENEFITS:
Signal timing improvements as well as visually monitoring traffic flow on central corridors will reduce overall vehicle stops and starts and limit delays in travel time. This reduction in vehicle stops and starts will improve the corridor’s average speed, thereby reducing the harmful pollutants generated by vehicles at low speeds and when idling.

COST BENEFIT RATIO: $15 – $30 / lbs.
TOTAL COST OF PROJECTS: $168,000 - $460,000
YEAR OF CONSTRUCTION: 2013-2014
STATUS: Planned

Proposed Traffic Control device Projects (Traffic Monitoring Cameras)
PROJECT TITLE: Kern Region Energy Action Plans (Kern REAP) and Kern Energy Watch Goal 3
PROJECT SPONSORS: Kern Energy Watch Partnership with Southern California Edison (SCE), Pacific Gas & Electric (PG&E), and Southern California Gas Company (SCG)

PROJECT DESCRIPTION:
Kern COG is coordinating Greenhouse Gas Inventories based on energy use and Energy Action Planning (EAP) for ten cities and the County of Kern. Energy Action Plans identify policies, goals, and strategies for the city or county to adopt and enforce or to implement to improve energy efficiency.

Through SCE’s Flight #5.6 Funding Opportunity and the Kern Energy Watch Partnership, Kern COG was awarded funding for activities that support California’s Long-Term Energy Efficiency Strategic Plan along with the Great Valley Center, which was awarded funding to implement PG&E’s Green Communities Program. Kern COG coordinates the efforts of all of the partners and programs. As of October 2013, the County of Kern and ten cities have completed baseline inventories for the years 2005 and 2010. Five cities and the County of Kern have adopted Energy Action Plans. Work will continue to update the inventories in 2014, to identify strategies to address natural gas use, then to update the plans, and to establish plans for the remaining local government partners.

PROJECT BENEFITS:
Through the development of EAPs, the participating municipalities will be the lead in conducting energy inventories and using energy efficiency to reduce global warming emissions and energy use in both their own facilities and throughout the communities.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: N/A
YEAR OF CONSTRUCTION: N/A
STATUS: Completed

Map of Kern Region Energy Action Plans and Utility Service Areas
APPENDIX E – SUCCESS STORIES

PROJECT TITLE: Tejon Ranch Conservation and Land Use Agreement
PROJECT SPONSOR: Tejon Ranch Co.

PROJECT DESCRIPTION:
On June 17, 2008, Tejon Ranch Co. and the nation’s major environmental organizations, including The Sierra Club, Natural Resources Defense Council, Audubon California, the Planning and Conservation League and the Endangered Habitats League, unveiled a landmark agreement on the future of the Tejon Ranch. The agreement provides for the permanent protection of 240,000 acres of the historic Ranch — approximately 90 percent of the entire landholding. The remaining 10 percent, or 30,000 acres, of the Ranch is designated for responsible, master-planned community development. The agreement and land use plan serve as a major regional sustainability success story, and the scale of the landscape makes it a state-wide and national success.

PROJECT BENEFITS:
The Ranch’s location between Bakersfield and Los Angeles and its adjacency to major California and national infrastructure corridors offer opportunities for regionally-beneficial development. The Conservancy has developed and is implementing a Ranch-wide management plan in collaboration with the Tejon Ranch Company.
The agreement also provides new opportunities for public access, including realignment of 37 miles of the Pacific Crest Trail to the Blue Ridge on Tejon Ranch, a potential location for a new CA state park, and a potential UC Reserve research site. In addition, the Conservancy leads public access programs that have brought approximately 5,000 visitors to the Ranch since 2008 and are serving approximately 1,000 per year through docent-led tours.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Not Applicable
YEAR OF CONSTRUCTION: Not Applicable
STATUS: In Progress

Reference: Tejon Ranch Co.

Tejon Ranch – Conservation and Land Use Plan Map
PROJECT TITLE: Kern County Community Revitalization Program  
PROJECT SPONSORS: County of Kern

PROJECT DESCRIPTION:  
With the recent loss of redevelopment agencies, the County of Kern Planning and Community Development Department established a centralized Economic Opportunity Areas and developed the RENEW BIZ grant-funding mechanism to assist communities with initiating projects that improve and enhance the quality of life within the community as well as increase the economic benefit to the County as a whole. The Kern County Community Revitalization Program provides the seed money for a focused visioning process that is tailored to each community to develop a visual road map and unique identity. Each community visioning effort is highly collaborative and requires the County's close collaboration with an outreach/visioning consultant and the local community. Many times, initial funding for the visioning efforts have come from private businesses.

Two of the community vision plans developed through the Kern County Community Revitalization Programs

PROJECT BENEFITS:  
The program has attracted investment and real improvements of over $4 million in the communities of Oildale, East Bakersfield, Rosamond, Mojave, Boron, and soon, Olde Town Tehachapi. The outreach efforts established a collaboration between residents, businesses, and stakeholders with the county that continues with physical improvements and additional planning efforts to be completed into the future.

COST BENEFIT RATIO: Unknown  
TOTAL COST OF PROJECTS: N/A  
YEAR OF CONSTRUCTION: N/A  
STATUS: In Process
APPENDIX E – SUCCESS STORIES

PROJECT TITLE: Kern Transit – Route Connection with Antelope Valley Transit Authority
PROJECT SPONSOR: Kern Transit

PROJECT DESCRIPTION:
Kern Transit now meets with Antelope Valley Transit Authority’s Route 785 that provides commuter service to Downtown Los Angeles, San Fernando Valley, and Century City. The Kern Transit Route 100 also connects with the Metrolink in Lancaster.

PROJECT BENEFITS:
The collaboration with Kern Transit and Antelope Valley Transit Authority provides significant alternative transportation benefits for commuters and enhances air quality.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS: Unknown
YEAR OF CONSTRUCTION: 2016
STATUS: In progress

Kern Transit Route 100 Schedule (September 2016)
APPENDIX E – SUCCESS STORIES

PROJECT TITLE: California State University of Bakersfield – Construction of Public Transit Center

PROJECT SPONSOR: Golden Empire Transit District, California State University of Bakersfield

PROJECT DESCRIPTION: The California State University of Bakersfield (CSUB) Transit Center is a partnership between CSUB and Golden Empire Transit District (GET). In GET’s Long Range Plan, a new transit center was identified in the Short-Term Service Plan (2013-2020) at CSUB campus. The transit center will facilitate access and travel to several activity centers that include large employers, retail, a hospital, medical offices, and residential neighborhoods.

PROJECT BENEFITS:
The CSUB Transit Center will improve existing transportation choices by enhancing points of modal connectivity, increasing the number of modes accommodated on existing assets and reducing congestion on existing modal assets. The location of the station is along a bicycle corridor and passengers may also connect with Kern Regional Transit.

COST BENEFIT RATIO: Unknown
TOTAL COST OF PROJECTS:
YEAR OF CONSTRUCTION: 2017, 2018, 2019
STATUS: In progress

Surrounding area of proposed CSUB Transit Center

Activity Centers Near CSUB
[1/4 ■ and 1/2 Mile Markers]
July 27, 2017

Ms. Mary Nichols, Chair
California Air Resources Board (ARB)
1001 I Street
Sacramento, CA 95814

Dear Ms. Nichols:

COMMENTS ON THE DRAFT STAFF REPORT ON THE PROPOSED UPDATE TO THE SENATE BILL 375 GREENHOUSE GAS EMISSION REDUCTION TARGETS AND THE DRAFT ENVIRONMENTAL ANALYSIS

The Los Angeles County Solid Waste Management Committee/Integrated Waste Management Task Force (Task Force) appreciates the opportunity to review and comment on the California Air Resources Board’s (ARB) Draft Staff Report on the Proposed Update to the Senate Bill 375 (Chapter 728 of the 2008 State Statutes) Greenhouse Gas Emission Reduction Targets dated June 2017 and the Draft Environmental Analysis (EA),

https://www.arb.ca.gov/cc/sb375/staff_report_sb375_target_update_june.pdf
https://www.arb.ca.gov/cc/sb375/appendix_e_draft_environmental_assessment.pdf

The Task Force would like to offer the following:

- Staff Report pg. 18-19: The Task Force recommends that the strategy areas analyzed by the Metropolitan Planning Organizations (MPOs) should consider the greenhouse gas (GHG) benefits of “near-zero” vehicles with low-NOx (nitrous oxide) engines powered by renewable natural gas (RNG) in addition to zero emission vehicles (ZEVs). The Task Force are supportive of the use of electric ZEVs, but ZEVs are not always entirely zero emission due to emissions that occur when the electricity is produced. According to ARB, California uses renewable resources for only about twenty-five percent of its electricity production. The majority of electricity is actually produced using emissions-heavy fossil fuels from sources in- and out-of-state.

The recently enacted Senate Bill 1383 (Chapter 395 of the 2016 State Statutes) requires jurisdictions in California to reduce the amount of organic waste being disposed by 50 percent by 2020 and 75 percent by 2025 through composting and anaerobic digestion processes as compared to the 2014 disposal rates. As such, we expect a significant increase in generation of biogas which can be used to generate electricity and/or RNG. Vehicles using RNG from the organic portion of solid waste have among the lowest complete emissions of any vehicle type. In fact, the
emissions are considered negative after factoring in the avoided emissions from less solid waste being disposed at landfills and generating emissions.

The use of near-zero vehicles can provide immediate GHG benefits, whereas the benefits of using ZEVs may not be seen for more than a decade at best. Deriving GHG emissions reduction from ZEVs is dependent on the renewable composition of the grid. Although SB 350 (Chapter 547 of the 2015 State Statutes) requires a 50 percent renewable portfolio by 2030, the state will continue to derive half its power from nonrenewable sources that produce emissions. Using low-NOx vehicles allows for significant GHG emissions reduction to be obtained immediately since this technology is not dependent upon the grid.

- Staff Report pg. A-10: The Southern California Association of Governments (SCAG) based their recommended GHG reduction target on an analysis which focused on strategies related to active transportation, ZEVs, mobility innovations, and further innovative strategies. The Task Force recommends that SCAG include the development and use of RNG from waste in near-zero low-NOx vehicles as a strategy to reach its GHG reduction target.

- The Staff Report needs to be expanded to include the vehicle registration surcharge fee and the additional $0.12 gas tax which is imposed on every gallon of gasoline by SB 1 (Chapter 5 of the 2017 State Statutes) as well as an estimated additional $0.63 per gallon which may result from Cap-and-Trade legislation (AB 398, Chapter 135 of the 2017 State Statutes) signed by the Governor on July 25, 2017. A portion of additional revenue generated should be allocated toward the expansion of existing and/or development of new anaerobic digestion infrastructure.

Pursuant to Chapter 3.67 of the Los Angeles County Code and the California Integrated Waste Management Act of 1989 (Assembly Bill 939 [AB 939], as amended), the Task Force is responsible for coordinating the development of all major solid waste planning documents prepared for the County of Los Angeles and the 88 cities in Los Angeles County with a combined population in excess of ten million. Consistent with these responsibilities and to ensure a coordinated, cost-effective, and environmentally sound solid waste management system in Los Angeles County, the Task Force also addresses issues impacting the system on a countywide basis. The Task Force membership includes representatives of the League of California Cities-Los Angeles County Division, County of Los Angeles Board of Supervisors, City of Los Angeles, the waste management industry, environmental groups, the public, and a number of other governmental agencies.

We respectfully request that the ARB address these issues in the Final Staff Report and Final EA.
Should you have any questions regarding these comments, please contact Mr. Mike Mohajer, a member of the Task Force, at MikeMohajer@yahoo.com or at (909) 592-1147.

Sincerely,

Margaret Clark

Margaret Clark, Vice-Chair
Los Angeles County Solid Waste Management Committee/
Integrated Waste Management Task Force and
Council Member, City of Rosemead

cc: Matthew Rodriguez, Secretary of the Cal EPA
    Each Member of the California Air Resources Board
    David Mallory, California Air Resources Board
    CalRecycle (Scott Smithline, Howard Levenson, Mark de Bie, Cara Morgan, Chris Bria & Graham Marshalle)
    League of California Cities
    League of California Cities, Los Angeles Division
    California State Association of Counties
    Each Member of the Los Angeles County Board of Supervisors
    Chief Executive Officer, County of Los Angeles
    Each City Mayor/Manager in the County of Los Angeles
    South Coast Air Quality Management District
    South Bay Cities Council of Governments
    San Gabriel Valley Council of Governments
    Gateway Cities Counsel of Governments
    Southern California Association of Governments (Carl Morehouse and Huasha Liu)
    Each City Recycling Coordinator in Los Angeles County
    Each Member of the Los Angeles County Integrated Waste Management Task Force
July 19, 2017

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Proposed Update to the SB 375 (Chapter 728, Statutes of 2008) Greenhouse Gas Emission Reduction Targets and Environmental Analysis

Dear Clerk of the Board:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to review and provide comments on the updated greenhouse gas (GHG) emission reduction targets (targets) and the environmental analysis, proposed by the California Air Resources Board (CARB). OCTA agrees with CARB's approach to focus the review on the 2035 targets, as 2020 is fast approaching, and metropolitan planning organizations (MPOs) throughout the state are facing significant challenges to meet the current 2020 targets.

Considering these challenges, and the current lack of data regarding the effectiveness of implemented projects and programs that support goals of Sustainable Communities Strategies (SCS), OCTA respectfully requests that CARB take a more conservative approach in this review cycle. As CARB is aware, the targets are eligible to be reviewed again in just four years, and the review process would benefit greatly from data collected through anticipated SCS implementation monitoring efforts. Therefore, OCTA encourages CARB to collect and analyze this data before making drastic changes to the targets.

The CARB draft staff report titled "Proposed Update to the SB 375 (Chapter 728, Statutes of 2008) GHG Emission Reduction Targets" notes under "Next Steps" that CARB intends to track SCS implementation efforts and outcomes to understand whether the SCS strategies are working. Moreover, the current version of SB 150 (Allen, D-Santa Monica), if passed, would require that CARB prepare a report by September 1, 2018, assessing the progress made by MPOs in meeting their targets.

This documentation and analysis, whether required by law or conducted as a CARB initiative, would greatly serve the target review process, and help to ensure that the targets remain ambitious and achievable within financially constrained Regional Transportation Plans and SCSs. Through discussions with the Southern California Association of Governments (SCAG) and other SCAG region stakeholders, there is a common concern that CARB's proposed targets are not achievable.
At the June 21, 2017, workshop conducted by CARB, several discrepancies between SCAG and CARB target evaluations were discussed that are causing much of this concern. These discrepancies need to be discussed with SCAG and resolved before any further action is taken by CARB to advance the current proposed targets.

SCAG’s assumptions were derived through a collaborative effort between SCAG, the San Diego Association of Governments, the Bay Area’s Metropolitan Transportation Commission, and the Sacramento Area Council of Governments. This collaboration served to provide CARB with insights through a bottom-up approach for identifying ambitious and achievable targets. OCTA is requesting that CARB reconsider using the targets recommended by these MPOs.

The MPOs have the greatest understanding of opportunities, issues, and modeling capabilities for developing and analyzing an SCS. Further, these agencies have consistently included all feasible GHG emission reduction strategies and best practices to address the current targets, so there is no reason to believe they would do anything less in future SCSs. Therefore, establishing exceedingly high targets does nothing but put these regions at risk of not achieving their targets.

OCTA is requesting that CARB relies on the insights and recommendations that have been provided by the MPOs for the 2018 target setting process. Until sufficient data is gathered and reviewed through the aforementioned monitoring reports, the statutorily required consultative process with the MPOs is the best available measure of what should be considered ambitious and achievable. Should you have any questions regarding this letter, please contact Greg Nord, Principal Transportation Analyst, at (714) 560-5885 or gnord@octa.net.

Sincerely,

Darrell Johnson
Chief Executive Officer

DJ:gn

c: OCTA Board of Directors;
    OCTA Executive Staff;
    Hassan Ikhrata, Executive Director, SCAG;
    Marnie Primmer, Executive Director, OCCOG
July 28, 2017

to: sb375update2017

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: 2017 Regional Target Update Draft Environmental Analysis

Dear Ms. Nichols:

The Transportation Solutions Defense and Education Fund (TRANSDEF) is an environmental non-profit dedicated to the regional planning of transportation, land use and air quality. Our focus is on reducing the impacts of transportation on the climate. We have commented on previous versions of the Scoping Plan and Regional Targets. These comments address Appendix E, the Draft Environmental Analysis (EA). Page references are to the Staff Report, Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, unless otherwise noted. A previously submitted letter commenting on the merits of the proposed Targets Update is herein incorporated by reference.

Our organization has been involved in the development of RTPs at MTC for the past 23 years. We created what we believe to be the first published Sustainable Communities Strategy: the TRANSDEF Smart Growth Alternative, which was modeled in MTC’s 2005 RTP EIR. We were active participants in the Working Group that revised the CTC’s RTP Guidelines in response to the adoption of AB 32 and SB 375.

Introductory Comments

The EA for the proposed regional targets must acknowledge the on-going shift in international policy regarding vehicle use. News just broke that Britain will ban fossil fuel-powered vehicles by 2040:

Environment Secretary Michael Gove said the changes are part of a $3.9-billion clean air strategy, adding there was no alternative to embracing new technology. “We can’t carry on with diesel and petrol [gasoline] cars,” he said, “not just because of the health problems that they cause, but also because the emissions that they cause would mean that we would accelerate climate change, do damage to our planet and the next generation.”
... French President Emmanuel Macron’s government announced this month that it also would ban the sale of all diesel and gas cars by 2040. (Los Angeles Times, 7/27/17.) Another sign of the times is the recent announcement by the Chief Executive Officer of Royal Dutch Shell Plc that the next car he buys will be a plug-in. (Bloomberg Markets, 7/27/17.) In comparison to these announcements, the proposal for SB 375 regional GHG emissions target updates is positively timid:

At the personal travel level, CARB staff’s proposed targets are equivalent to reducing VMT a half a mile per person per day. (p. 22, emphasis added.)

In some ways, it is easier to understand the Trump Administration than ARB, because at least one knows what USEPA wants to do. The State’s premier climate change agency, on the other hand, is working at cross-purposes, proposing to adopt targets that do not achieve its own statutory requirements. Nonetheless, the EA, the agency’s purportedly unbiased analysis of its own work, does not disclose any impacts from that.

The EA Fails to Acknowledge MPO Resistance to SB 375 Compliance
These inadequate proposed targets, which admittedly are unable to generate sufficient emissions reductions to meet State emissions reduction targets, are the result of staff’s acceptance of the Business as Usual assumptions of the MPOs. A process based on setting targets that “are not out of reach for regions and local governments” (p. E-15) requires taking a hard look at what the MPOs claim is feasible in their submissions. That has not happened.

ARB has not established that MPOs are making good faith efforts at GHG emissions reduction. TRANSDEF’s experience commenting on recent EIRs is that local and regional agencies are routinely approving plans that include significant increases in VMT and GHG emissions—without the slightest concern.

Using MTC as an example:

- The freshly adopted 2017 EIR shows no signs of VMT reduction. To the contrary, drive-alone trips will increase by 21% by 2040. As a result, GHG emissions are projected to increase by 20%, prior to off-model adjustments. (MTC RTP/SCS DEIR, Tables 2.1-15 and 2.5-10 (p. 2.5-40)).

- Mode shares remain static through 2040, indicating that new residents are not projected to use transit any more than at present. This indicates that the SCS has had no beneficial effect on VMT or GHG emissions. (Id., Table 2.1-15.)

- The DEIR claims that “There are no additional land use strategies available to feasibly bridge the gap between the proposed Plan GHG emissions and 2030 (and beyond) targets.” (Id., p. 2.5-43.)
MTC claims to have "no additional land use strategies" while refusing to require counties to submit projects to the RTP that are consistent with a regional strategy. It continues to widen highways to accommodate single-occupant vehicles, and funds extravagant transit megaprojects rather than cost-effective projects. This is an agency that has firmly rejected its duty under SB 375 to plan for "changed land use patterns and improved transportation." To give MPOs targets that are "not out of reach" is to condone their Business as Usual ways, which flout the law. That makes ARB vulnerable to the charge of failure to perform its mandated duties.

Existing GHG Reduction Strategies
California's Existing GHG Reduction Strategies are not working well in the transportation sector. Passenger vehicles are by far the largest GHG source category that is still increasing. (ARB 2017 Edition of California GHG Emissions Inventory, p. 4.) Staff's ignorance of the basics of transportation sector GHGs may well be contributing to that poor performance:

In the meantime, MPOs need resources to invest early in infrastructure planning to lay the groundwork for long-term change. The dwindling federal and State funding that is available to MPOs is primarily directed to building and maintaining roadways. Additional discretionary funding for transit and active transportation capital projects is needed. (p. D-10.)

Using MTC again as an example of MPO efforts, TRANSDEF sees no groundwork being laid for long-term change in the RTP/SCS just adopted this week. As indicated in this quote, funding "is primarily directed to building and maintaining roadways." The only reason additional funding is needed is because MPOs refuse to stop supporting Business as Usual. Not only is no long-term change in progress, these investments directly contribute to the increased VMT and GHG emissions projected for 2040. The absolute last reason why ARB should be calling for MPOs to receive additional funding is so that they can continue their current GHG-increasing efforts.

The transportation and land use priorities of the local jurisdictions may occasionally conflict with an MPO's regional priorities identified in the RTP/SCS. This practice also has implications for the SB 375 targets that could be a factor leading to a wide range of targets among the MPOs. (Id.)

The first sentence quoted here may well be the understatement of the Century. However, local priorities cannot be allowed to sabotage the State's effort to reduce emissions. Giving communities lower targets would allow them to shirk their responsibility for adding emissions to a global problem.

A major reason why VMT and passenger vehicle GHGs continue to increase is that the State enables MPOs to continue Business as Usual: expanding capacity for solo
drivers. Example: The HOV Toll Lanes entry in Table 2-2, the Summary of Potential Continuation or Expansion of Existing GHG Reduction Strategies in Future RTP/SCS Updates (p. E-25.) The sole purpose of HOV Toll Lanes is to provide more highway capacity for solo drivers. Any credible plan to reduce transportation GHG emissions would necessarily shift all funding from roadway expansion to transit expansion. Deleting this entry in the matrix will make larger emissions reduction targets feasible.

Inadequate Scope of Environmental Analysis

The scope of environmental analysis of the Project--the proposed regional targets--is so truncated that it does not serve its asserted informational role:

The scope of analysis in this Draft EA is intended to help focus public review and comments on the Target Update, and ultimately to inform the Board of the environmental benefits and adverse impacts before Board action on the proposal. This analysis focuses on reasonably foreseeable potentially significant adverse and beneficial impacts on the physical environment resulting from reasonably foreseeable compliance responses to the Target Update. (p. E-10.)

The Board cannot possibly be adequately informed if the EA analyzes only the Project's "reasonably foreseeable compliance responses." The EA fails to analyze the Project's overall compliance with SB 375, SB 32, the Executive Orders, the Scoping Plan (either the 2014 version or the 2017 draft) or any of the other components of the Regulatory Setting identified in Table 10 (p. E-199).

In particular, the EA's Cumulative Impacts analysis (p. E-128) fails to analyze the impact of the proposed target on overall state-wide GHG emissions from cars and light trucks. These emissions are not quantified. This lack is not excused by the programmatic nature of the analysis. Because the sole purpose of the Project is to address these emissions, the EA lacks absolutely critically important information needed by Board Members. The staff report is also silent on whether the targets will result in significant additional GHG reductions from changed land use patterns and improved transportation. It never makes that analysis, despite that being the key to what is required by SB 375. (See Alternatives Analysis section, below.)

Overall, the Target Update would result in an additional reduction of GHG emissions of over 10 million metric tons of carbon dioxide (CO2) per year in 2035 compared to the current targets. (p. E-76.)

The EA offers no other quantitave analysis of the overall impact of the proposed 19.9% aggregate per capita targets (p. 23). No quantitave context is provided to make it possible to compare those emissions reductions to the total GHG emissions reductions required to achieve the called-for 25% reduction, to determine the significance of the shortfall in emissions reductions:
CARB staff’s top-down analysis estimates that SB 375 and other VMT reduction strategies need to provide a 25 percent reduction in statewide per capita greenhouse gas emissions relative to 2005 by 2035 to meet these goals... (p. E-22.)

The proposed per capita targets could result in GHG emissions reductions that are low enough to impede attainment of SB 32 targets. The EA fails to analyze this critical impact.

**Alternatives Analysis**

Using MTC’s recently adopted RTP/SCS as an example of “the level of detail that would be contained in subsequent environmental review when MPOs act to update their RTP/SCS” (p. E-146), ARB’s proposed targets must have been framed within a context of overall expectations of little to no change in mode shares, and a large increase in VMT in each of the regions. This is an acceptance of local and regional policy implementation failure that TRANSDEF finds not only unacceptable but legally inadequate in the context of environmental review.

TRANSDEF disputes the claim that:

CARB staff found no comments suggesting an alternative comprehensive approach to meet the State’s long-term goals. (p. E-147.)

One obvious Alternative that should have been studied is assigning targets to reduce each region’s total GHG emissions from cars and light trucks, the idea that was rejected in 2010. TRANSDEF opined then, and in each of its subsequent comment letters, that the decision to use per capita targets masks the net increases in total regional GHG emissions (when calculated without subtracting reductions from state-level measures) that occur as a result of population growth, even if the previously adopted per capita targets are met. TRANSDEF recently wrote staff (letter is attached) because plan EIRs typically misstate total GHG emissions, making it appear that GHG emissions are fine.

The listing of Project Objectives (pp. 147-148) fails to mention the foundational intention of SB 375:

...greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve **significant additional** greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32. (Chapter 728, Statutes of 2008, Section 1(c) and (i), emphasis added.)
All Alternatives needed to be evaluated against this Objective to determine whether total regional emissions from cars and light trucks will actually be reduced as a result of the SCS (and not the State measures), to confirm that SB 375 is being implemented.

Alternative 4 Analysis
Alternative 4, the Substantially More Stringent Targets Alternative, would set "MPO 2035 targets to a level that would meet the full VMT reduction needs assumed in the 2017 Scoping Plan Update." (p. E-148, referring to the 25 percent reduction in statewide per capita greenhouse gas emissions relative to 2005 by 2035, p. E-22.) TRANSDEF asserts that SB 375 mandates ARB to adopt targets that accomplish at least that. TRANSDEF strongly disagrees with the analysis of Alternative 4:

Under Alternative 4, CARB anticipates many MPOs will prepare an APS. To date, no MPO has prepared and relied on an APS, so the impacts are unknown. By using an APS rather than an RTP/SCS, however, it would be less certain that actual gains of target increases would ever come to fruition... (p. E-148.)

... if targets were substantially more stringent than proposed levels under the Target Update, the actual gains of that increase would be less likely to ever come to fruition. In a situation where most MPOs adopt APSs, status quo development patterns could continue for the foreseeable future because the incentives designed to support SB 375 would no longer be attainable. (p. E-149.)

As we stated in our merits comments, which used MTC as an example, we seriously doubt that any MPO has achieved actual or projected emissions reductions from the implementation of an SCS. Because California has not seen any VMT or GHG emissions reductions yet under the lax conditions of current policy (see 2017 Edition of California GHG Emissions Inventory), future VMT reductions under similarly lax conditions are very unlikely. TRANSDEF is unaware of any significant mode shift so far resulting from SB 375. VMT has continued to climb. That makes the conclusion "less certain" actually preposterous in contrast to what is currently being achieved: zero.

We also note the absence of any projects in our region that have been processed under CEQA streamlining, severely undercutting the assertion that "the incentives designed to support SB 375" have had any effect at all. Even worse, the very argument "regional and local governments relying upon an APS will [not] be able to successfully compete and implement projects" (p. E-148) is actually an argument for those agencies to not rely on an APS.

TRANSDEF strongly objects to the assumptions implicit in the statement "setting targets that ensure the majority of MPOs must rely on an APS over the long term to meet targets." (pp. E-148-149.) ARB is implying in this statement that MPOs cannot possibly
be expected to give up their capital programs that increase highway and arterial capacity while underfunding transit. The classic example of this is SANDAG's first RTP/SCS, which suffered badly in the courts. The entire analysis is impermissibly poisoned by status quo thinking.

Conclusion
The EA fails to disclose the impacts resulting from adopting the proposed targets, which do not meet the requirements for reducing GHG emissions set out by the latest scientific analysis, as represented in the 2017 draft Scoping Plan. The EA's analysis of Alternative 4, which would achieve those requirements, is fatally flawed. The EA is therefore legally inadequate to support an adoption of the proposed targets.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President

Attachment: TRANSDEF Letter to ARB re: EMFAC and SB 375
April 18, 2017
By E-Mail

Cynthia Marvin, Division Chief
Transportation and Toxics Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: EMFAC's SB 375 Compatibility

Dear Ms. Marvin:

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. In our recent reviews of the Bay Area Clean Air Plan FEIR and 2017 Plan Bay Area DEIR, we have identified a serious error in the analysis of regional GHG emissions that we believe is the result of inadequate support and guidance from ARB.

Both of these documents find that, because regional emissions declined, the respective plans have no significant CEQA impacts on regional GHG emissions. Table 3.3-4 (p. 3.3-6) of the CAP FEIR offers no projection of regional emissions beyond 2020, making it useless in identifying the effectiveness of the CAP for climate protection. Both the CAP FEIR Table 3.3-4 and Table 2.5-11 (p. 2.5-41) of the PBA DEIR rely on EMFAC for calculating transportation GHGs. EMFAC's outputs include the state-level Scoping Plan measures in its projection of future GHG levels.

TRANSDEF asserts that these analyses fail to comply with the legislative intent of SB 375, as expressed in these legislative findings:

...greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32. (Chapter 728, Statutes of 2008, Section 1(c) and (i), emphasis added.)
Adding back the state-level emissions reductions into the PBA regional totals produces a 7.6% increase in regional emissions, rather than the claimed 13% reduction. (Note that this calculation includes the claimed reductions for MTC Climate Initiatives Program, which will be the subject of future DEIR comments, due to our scepticism about the validity of these "measures.")

It should be obvious that increases in regional emissions threaten the Scoping Plan's effectiveness in achieving state climate targets. This is precisely why the Legislature enacted SB 375. TRANSDEF respectfully requests that ARB provide MPOs with guidance as to the proper methodology for evaluating regional GHG emissions, and make an SB 375 version of EMFAC available to make it easy for MPOs to calculate regional emissions without the reductions that come from state-level Scoping Plan measures.

Conclusion
Bay Area regional GHG emissions keep growing, despite the explicit legislative intent of SB 375 to mandate MPOs to secure emissions reductions beyond those accomplished at the state level. The growth in regional VMT is undoing the emissions reductions being achieved by the state and endangering the state’s attainment of its climate targets.

We appreciate this opportunity to call ARB’s attention to a serious structural defect in its administration of SB 375, and look forward to a response.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President
David@Schonbrunn.org

CC:
Mary Nichols, ARB
Lezlie Kimura Szeto, ARB
Jeff Long, ARB
Steven Cliff, PhD, ARB
David Vintze, BAAQMD
Harold Brazil, MTC
David Ory, MTC
Carey Knecht, ClimatePlan
Matt Williams, Sierra Club
July 28, 2017

Chair Mary D. Nichols and Board Members
California Air Resources Board
1001 “I” Street
Sacramento, CA 95814

Via: sb375update2017

RE: Proposed Update to the Senate Bill 375 (SB 375) Greenhouse Gas (GHG) Emission Targets and Environmental Analysis for the San Francisco Bay Area

Dear Chair Nichols and Board Members:

On behalf of the Loma Prieta, Redwood, and San Francisco Bay Chapters and our more than 62,000 members in the nine-county San Francisco Bay Area, the Sierra Club is pleased to submit these comments and recommendations to the Air Resources Board (ARB) regarding future GHG Targets for the Metropolitan Transportation Commission (MTC) as a Metropolitan Planning Organization (MPO) under SB 375.

On July 26, 2017, MTC adopted its newest Regional Transportation Plan (RTP) and associated Sustainable Communities Strategy (SCS) known as Plan Bay Area 2040 (PBA 2040). Along with a multitude of related documents, PBA 2040 purports to exceed its current ARB targets by achieving reductions of 10% by 2020 and 16% by 2035, largely through a variety of low-cost “strategies” known collectively as “Climate Initiatives.”

Climate Initiatives first appeared at MTC in 2013. Unfortunately, there is little documentation that much in the way of funding has being spent or programmed on Climate Initiatives since the 2013 RTP was adopted. ARB ought to consider a review of the status of the 2013 RTP’s Climate Initiatives to see what actually has been accomplished, and to use such documentation as a future metric in ARB’s evaluations.

Now with the adoption of PBA 2040, the next iteration of the Climate Initiatives program is supposed to reduce greenhouse gas emissions and other pollutants by 11% of the Bay Area’s 16% total reductions by 2035; that is, Climate Initiatives will account for 69% of the total GHG reductions in PBA 2040.

The Sierra Club is concerned that the Climate Initiatives will not reduce the driving of cars and light trucks, which is a key to the SCS and urban infill development. It does not matter if every car and light truck is powered by electric batteries by 2035. The reason is...
that PBA 2040 estimates there will be 666,200 additional households in the Bay Area by 2040, and that the average household will have 1.7 vehicles (Table 2.1–11, Draft Environmental Impact Report). Multiplying the figures together provides an indication that the number of vehicles in the Bay Area will increase by over one million. There is no place on already built up local streets in the Bay Area’s Priority Development Areas for the extra vehicles to operate or be parked. ARB ought to consider what the additional vehicles will mean for the success of the SCS.

ARB ought to consider if or how MTC’s approach will actually result in reducing not only GHGs but vehicle miles traveled. Consider these examples:

The mode–share split resulting from PBA 2040 (versus 2015) is provided in Table 2.1–15 in the Draft Environmental Impact Report (and provided in the Sierra Club’s Comments on PBA 2040 and its Draft Environmental Impact Report, attached to this letter and incorporated by reference) in the Proposed Update. Walking as a percentage of all trips will stay the same from 2015 to 2040! ARB ought to consider if PBA 2040 has enough funding to provide the necessary level of support for walking to make the SCS a success and whether Climate Initiatives will be helpful.

The comments on the Draft PBA 2040 by the California Department of Transportation, District 4, include a discussion of bicycle trips. Table 2.1–15 shows they will decrease from 2015 to 2040! ARB ought to consider if PBA 2040 has enough funding to provide the necessary level of support for bicycles to make the SCS a success and whether Climate Initiatives will be helpful.

Transit trips will increase from 6.4% of all trips to just 6.9% of all trips. However, AC Transit submitted a comment letter that brings that gain into question. ARB ought to consider if PBA 2040 has enough funding to provide the necessary level of support for transit to make the SCS a success and whether Climate Initiatives will be helpful.
The Sierra Club supports the proposed ARB Staff Report target for MTC of 19% reduction by 2035, as set forth in the Draft Environment Analysis. But achievement of the target must be provable, evidence-based and supportive of the SCS.

The Sierra Club appreciates the opportunity to support ARB’s mission and efforts to realize SB 375’s objectives. If we can be of further assistance, including possible participation in the upcoming Stakeholder Roundtable(s), please do not hesitate to contact me at mwillia@mac.com.

Sincerely,

Matt Williams
Chair, San Francisco Bay Chapter Transportation and Compact Growth Committee

Attachment: Sierra Club comment letter on draft PBA 2040 and its Draft EIR

cc: Metropolitan Transportation Commission
    California Department of Transportation, District 4
    AC Transit
    Sierra Club California
June 1, 2017

Via email

MTC and ABAG
375 Beale St
San Francisco, CA 94105
eircomments@mtc.ca.gov
info@planbayarea.org

Re: Sierra Club Comments on Plan Bay Area 2040 and its Draft Environmental Impact Report

To whom it may concern:

On behalf of the Loma Prieta, Redwood, and San Francisco Bay Chapters of the Sierra Club and their more than 62,000 members in the nine-county San Francisco Bay Area Region, Earthjustice submits these comments on Plan Bay Area 2040 (PBA 2040 or “the Plan”) and its Draft Environmental Impact Report (DEIR).

At a time when the Bay Area’s transit agencies, such as BART and MUNI, are bursting at the seams, the streets and highways are clogged with cars, the cost of housing is skyrocketing and residents are seeing the value of their income shrink or in many instances are forced to move away, MTC and ABAG propose to spend $303 billion dollars on a plan that does little to change the driving-centric status quo. Among other things, the Plan includes investments in 460 miles of freeway expansion projects, an eight percent increase.¹

Rather than developing a “Sustainable Communities Strategy” (SCS) that reforms the transportation infrastructure of the Bay Area and decreases the region’s reliance on carbon-intensive modes of transit, the Plan continues to rely on automobiles as a mode of transit and even expands highways. In 2040, weekday bicycling trips decrease by .1 percent per mode share, walking stays the same and transit trips increase by only .5 percent per mode share.²

¹ DEIR, p. 2.1–22, Table 2.1-12.
² DEIR, p. 2.1-26, Table 2.1-15 (fn. omitted).
The Plan lacks sufficient expenditures for walkable communities, and the funding for transit service, which is already suffering the strains of overcrowding, fails to accommodate projected new ridership. Further, the Plan fails to prevent displacement of vulnerable families, which creates likely undesirable outcomes of increased traffic, congestion, and sprawl. By 2040, the combined cost of housing and transportation for lower-income households will increase from 54 percent to 67 percent.³

It’s disappointing that this second round of Plan Bay Area represents only a minor update to the Plan Bay Area adopted in 2013. Sierra Club had hoped that the outcomes of the first Plan Bay Area would serve as a “beta version” and that lessons learned from the first round would be incorporated into a more aggressive successor. It would have been beneficial to the public and decisionmakers for MTC and ABAG to present a comprehensive analysis of what PBA 2013 actually accomplished, what trends are observed leading toward reductions in greenhouse gases (GHGs) and vehicle miles traveled (VMT), and what steps or policies have been determined to be counter-productive, and why. Avoiding this crucial information in the current update merely guarantees limited improvements in building and moving a better Bay Area.

The Plan establishes thirteen “performance targets” that are intended “to measure Plan Bay Area 2040’s effectiveness in addressing the major challenges facing the region.”⁴ Eight of these targets will not meet the goals of PBA 2040.

Sierra Club urges that the draft plan be revised to prevent displacement, to steadily reduce automobile travel, and to substantially reduce greenhouse gas emissions from the transportation sector. It is unlikely that such a revision can be done within the projected schedule. However, rather than adopting a Plan for the next four years that would make it more difficult to achieve the 2035 greenhouse gas reduction targets, it is preferable to begin exploring and addressing these issues immediately.

Under the California Environmental Quality Act (CEQA), a major purpose of the DEIR is to “inform decision-makers, responsible and trustee agencies, and members of the public as to the range of the environmental impacts of the Plan.”⁵ For the reasons in this letter, Sierra Club believes that the DEIR fails in this mission.

1. **The Plan Must Comply with CEQA and SB 375.**

CEQA requires the EIR to provide full and accurate information about the ability of the Plan Bay Area to achieve the greenhouse gas reductions targeted by the Plan, as well as to consider alternatives which might provide a better means of attaining those objectives. (Cal. Pub. Res. §§21000-21002.)

³ Plan Bay Area 2040 Equity Analysis, p. 5-3; see also p. 5-2, Table 5-1 (lower-income households earn less than $60,000 a year).
⁵ DEIR, p. ES-2.
CEQA was intended to promote California’s policy to “develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.” CEQA must “be interpreted in such manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.” Among the goals of CEQA are to “inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities,” and to “identify ways that environmental damage can be avoided or significantly reduced.”

The EIR is “the heart of CEQA,” and functions as an “environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.” Furthermore, “it is a document of accountability,” which provides the public with a basis for understanding the decision-making process of public agencies.

To that end, the EIR must contain a statement of “all significant effects on the environment of the proposed project,” as well as statements relating to unavoidable and/or irreversible effects, mitigation measures to minimize impacts on the environment, alternatives to the proposed project, and the “growth-inducing impact” of the proposed project. It must contain a “sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences.”

According to the DEIR, “[t]he Sustainable Communities and Climate Protection Act of 2008, commonly known as Senate Bill 375 (SB 375 Steinberg, 2008), requires California’s 18 metropolitan planning organizations (including MTC) to develop an SCS as an element of the federally mandated RTP [“Regional Transportation Plan”]. The SCS demonstrates [or is supposed to demonstrate] how the region will meet its greenhouse gas (GHG) reduction targets established by the California Air Resources Board (ARB) through integrated land use, housing and transportation planning. In the Bay Area, MTC and ABAG are jointly responsible for this planning effort.”

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8 14 C.C.R. §15002(a)(1) and (2).
9 Laurel Heights, 47 Cal. 3d at 392 (internal citations omitted).
10 Id.
12 CEQA Guidelines, §15151.
2. The Plan Fails to Provide Substantial Evidence to Support the Projected Greenhouse Gas Emissions Reductions from Plan Bay Area.

The DEIR claims that the Plan meets SB 375’s GHG reduction mandates, but a close examination of the DEIR reveals a different story. Rather than develop an integrated land use and transportation plan to reduce greenhouse gas emissions,\textsuperscript{14} the Plan proposes transportation policies, “Climate Policy Initiatives,” that generally attempt to reduce greenhouse gases without fundamentally changing land use or driving patterns. In fact, VMT continue to increase during the Plan. “[B]etween 2015 and 2040, the Bay Area is projected to add about 1.9 million people (a 26 percent increase) and 688,000 jobs (a 17 percent increase). Based on expected future growth, the total vehicles miles traveled would increase by 21 percent, which means that VMT is projected to grow at a slightly slower rate than population, but at a faster rate than jobs in the region.”\textsuperscript{15}

MTC projects that its Climate Initiative Programs will reduce fewer GHGs in 2040 than it does in 2035.\textsuperscript{16} The corresponding projected increase of GHGs from 2035 to 2040 indicates that the Plan fails to fundamentally integrate land use and transportation policy because an integrated plan would result in continued downward projection of GHG emissions.

Consistent with this failure, projections for transit, bicycling and walking barely change if at all under the Plan. This mode share chart from the DEIR reveals Plan Bay Area’s failure to fundamentally change Bay Area transportation:\textsuperscript{17}

\begin{table}[h]
\centering
\begin{tabular}{|c|c|c|c|c|}
\hline
Purpose & 2015 & & 2040 Plan & \\
& Trips & % of Total & Trips & % of Total \\
\hline
Drive Alone & 12,310,000 & 47.6\% & 14,880,100 & 46.6\% \\
Carpool & 8,917,700 & 34.4\% & 11,138,800 & 34.9\% \\
Transit & 1,660,900 & 6.4\% & 2,208,500 & 6.9\% \\
Walk & 2,695,600 & 10.4\% & 3,320,700 & 10.4\% \\
Bike & 305,500 & 1.2\% & 359,100 & 1.1\% \\
Total Trips & 25,889,700 & 100\% & 31,907,200 & 100\% \\
\hline
\end{tabular}
\end{table}

\textsuperscript{14} See DEIR, p. 2.5-17 (“SB 375 requires regional planning agencies to include a Sustainable Communities Strategy (SCS) in their regional transportation plan (RTP) that demonstrates how the region could achieve GHG emissions reductions set by ARB through integrated land use and transportation planning.”)

\textsuperscript{15} DEIR, p. 2.5-33.

\textsuperscript{16} DEIR, p. 2.5-36.

\textsuperscript{17} DEIR, p. 2.1-26, Table 2.1-15 (fn. omitted).
The DEIR fails to provide substantial evidence that the Climate Initiatives Programs will achieve the claimed emission reductions. Although the EIR claims specific GHG reductions for each of the programs, the DEIR and its related travel modeling report fail to show that these programs work in practice. PBA 2013 included 7 climate initiatives that have been similarly included in this Plan: Commuter Benefit Ordinance, Car–Sharing, Vanpool Incentives, Clean Vehicles Feebate Program, Smart Driving Strategy, Vehicle Buy–Back & Plug–in Electric Vehicle Purchase Incentive, and Regional Electric Vehicle Charger Network. The DEIR and related travel modeling report fail to describe the time frame for these programs, success to date or even whether they have been started or funded, and MTC’s Transportation Improvement Program (TIP) shows little evidence of any such funding.

The EIR’s purported GHG reductions are “the sorts of speculative mitigation measures that do not comply with CEQA.” In Clean Energy, the Court of Appeal held that the City’s final EIR was inadequate, in part, because the call for a strategic plan and implementation strategy appeared in the DEIR with little discussion or analysis. The City’s plan stated vague goals without obligating it to “undertake any actual mitigation,” just as the MTC’s EIR does here in mentioning the Climate Policy Initiatives Program without substantial evidence that it will achieve said emission reductions. The calculations in the Travel Modeling Report do not appear to be based on real world experience in implementing these initiatives from Plan Bay Area 2013.

Climate Initiatives, such as the “Vehicle Buyback Program” that increase the number of cars, need to be reconsidered, because successful Priority Development Areas (PDAs) require VMT reductions; built up urban areas contain no room for road capacity expansion. The DEIR estimates an increase in more than 1.1 million cars in the Bay Area by 2040. Put simply, the streets in many of the PDAs have no room for these additional cars.

Furthermore, the Plan’s claim that more than 8% of the GHG reductions will result from “Smart Driving” fails to pass the straight face test. With this measure, the Plan proposes an education and media program to encourage “smooth acceleration and deceleration.” MTC calculates its estimated GHG reductions based on a study with an admittedly

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18 DEIR, p. 2.5-36, Table 2.5-6.
19 Cf. Plan Bay Area (2013), pp. 87-89; see also DEIR, p. 2.5-36, Table 2.5-6.
21 Id. at 197.
22 See id.
23 See DEIR, p. 2.1-21, Table 2.1-11 (each new household will have an average of 1.7 cars).
small sample size of 18 people. Rather than reducing VMT, MTC claims that drivers can be retrained to drive better for the environment.

The DEIR acknowledges that implementation of the Plan could potentially conflict with the goals of Senate Bill 32 (Chapter 249, Statutes of 2016) to reduce GHGs. Sierra Club continues to urge MTC and ABAG to focus on practical strategies to meet the long-standing State policy goal to achieve an 80% reduction in greenhouse gas emissions by the year 2050.

3. Lack of Sufficient Funding for Mass Transit Impedes Achievement of Plan’s Performance Targets.

Sierra Club continues to be very supportive of the goals of SB 375—to reduce GHG emissions and VMT. To accomplish these ends, viable PDAs must be made successful, and must include levels of transit service that will make travel by single-occupancy auto generally unnecessary. The projected regional transit costs in “Transit Operating and Capital Needs and Revenue Assessment” show that the Plan does not fund enhanced levels of service in the PDAs. The existing transit service cannot be fully operated with a 14.6 billion dollar residual capital shortfall (31% of total capital needs). There appears to be no strategy to eliminate this shortfall.

The funding shortfall calls into question how existing levels of services can be maintained through the life of PBA 2040. A key aspect of PBA 2040 should be the operation and maintenance of the existing mass transit system, plus the provision of an increased level of service to be able to provide for increased passenger ridership of the expected number of new residents. In fact, the 2010 RTP Guidelines call for addressing “short and long-range transit plans along with the capital finance plans for the 20-year period of the RTP.” It stretches the imagination to fathom how a projected 6.9 percent increase in typical weekday daily person trips, or more than a half a million trips, will be able to be successfully added to Bay Area transit systems, some of which currently operate at capacity during peak time. The Plan will not meet its target of “[r]educ[ing] per-rider transit delay due to aged infrastructure” without addressing the transit funding shortfall.

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24 Travel Modeling Report, pp. 57-59.
25 DEIR, p. ES-21, Table ES-2, Impact 2.5-3.
27 Id.
29 See DEIR, p. 2.1-26, Table 2.1-15.
30 See DEIR, p. 3.1-19, Table 3.1-12.
4. **A Robust and Enforceable Complete Streets Program Would Help Address MTCs Failure to Meet Some of the Plan’s Performance Targets.**

The Plan’s lack of progress in implementing Complete Streets programs in the PDAs contributes to the Plan’s failure to meet the GHG targets as well as the Plan’s performance targets. For example, the Plan fails to meet its target of “[i]ncreas[ing] non-auto mode share by 10%.” This shortfall is due to the Plan’s failure to reform land use and transportation. Table 2.1-15, above, shows that drive-alone car trips in 2015 were 47.6% of all trips (including walking) and that by 2040 drive-alone car trips will have only been cut to 46.6% of all trips—almost no change from the $303 billion dollar Plan. Similarly, the Plan’s funding of additional highway miles is counter-productive. The DEIR indicates that 460 miles of Freeway Lanes and 60 miles of Expressway Lanes will be constructed with PBA 2040. Freeway Lanes lead to an increase in VMT, and a recent report released by MTC also shows Expressway Lanes increase VMT.33

The Plan targets could be better achieved by focusing the Plan on a campaign to implement and fund a Complete Streets treatment within each PDA. For example, the Plan’s target is to “[r]educe adverse health impacts associated with air quality, road safety, and physical inactivity by 10%,” but it is only reduced by one percent. Some of this shortfall most likely results from a projected 21 percent increase in VMT through 2040. Similarly, the Plan does not meet the target to “[r]educe vehicle operating and maintenance costs due to pavement conditions.” Bicycles, buses, and pedestrians, as wells as cars, need well-maintained streets.

MTC’s resources should be spent integrating land use and transportation policy by developing more “Complete Streets.” MTC needs to develop and adopt coherent and effective programs that are consistently applied toward realizing the Plan’s targets. For example, incentives should be used to encourage jurisdictions to get the pot holes repaired as part of a campaign to implement a Complete Streets treatment within each PDA. MTC has discretionary authority over significant amounts of Federal, State, and local funding that can be allocated to help achieve desired outcomes. Any recipient

31 See PBA 2040, p. 65.
32 The DEIR, p. 2.1-22, Table 2.1–12.
34 PBA 2040, p. 65.
36 PBA 2040, p. 65.
jurisdiction that fails to meet such directives should be required to return regionally approved funds or, at a minimum, be determined ineligible to receive additional funds until compliance is documented. This will require strengthening the “Action Plan” through clear metrics and robust monitoring and oversight.

5. The Plan Fails to Adequately Address the Housing Crisis.

Given the magnitude and political sensitivity of “The Regional Housing Crisis,” the Plan does not sufficiently address this pressing issue. The plan fails to meet, and in fact moves in the opposition direction of, its target of “not increase[ing] the share of low- and moderate-income renter households in PDAs, TPAs, or high-opportunity areas that are at risk of displacement.”37 The Regional Housing Needs Allocations figures for the first year of the current eight-year cycle show an insufficient amount of permits issued.38

More attention and detail need to be presented to address the housing crisis. In particular, allocation of One Bay Area Grant (“OBAG”) and other regional discretionary funds need to be tied directly to achievement of Regional Housing Needs Allocations “numbers” for each jurisdiction—measured in terms of actual construction, not merely permits issued. If a jurisdiction has received funding from MTC (e.g., an OBAG grant) and the jurisdiction is not getting the housing production needed, it should be possible to claw back the grant funds.

The “Housing Principles for MTC and ABAG 2017 State and Federal Legislative Advocacy” provide a good basis from which to start a coordinated approach to address regional and housing needs, and do not increase either displacement or into-region commutes. MTC and ABAG need to work with local jurisdictions to present a coherent information program on what PDAs are, how they can benefit a community, and how they can enhance opportunities for residents of all levels of income to live and work locally. MTC and ABAG should educate elected and appointed officials about PDAs.

The Plan’s Housing Elements action plan in Table 5.1 should be accelerated,39 because the Bay Area suffers from an acute housing crisis. The Plan explains that “…the foundation of the [housing] crisis is simple: there simply isn’t enough housing, whether market-rate or affordable, given the growing number of residents and jobs.”40 With this back drop, the Plan must do more to meet its performance targets. For example, the Plan seeks to “[d]ecrease the share of lower-income residents’ household income

37 PBA 2040, p. 65.
38 See Association of Bay Area Governments, "San Francisco Bay Area Progress in Meeting 2015-2023 Regional Housing Need Allocation (RHNA)" available at http://abag.ca.gov/abag/events/agendas/r020117a-Item%2005%20Attach%201%20RHNAPr
39 See PBA 2040, p. 74.
40 Id. at p. 7.
consumed by transportation and housing by 10%. However, the Equity Analysis shows that low income household expenditures of the combination of transportation and housing rise by 13% by 2040. This increase contradicts the Plan’s claimed success that the Plan meets its target to “house region’s projected growth by income level without displacing current low-income residents and with no increase in in-commuters over the Plan baseline year.” The Plan also fails to meet its target of “increas [ing] the share of jobs accessible within 30 minutes by auto or within 45 minutes by transit in congested conditions by 20%.” This can be attributed to the regional housing crisis as well as lack of progress with land use and transportation reform.

6. The Plan and DEIR Need to Better Consider Sea Level Rise and Drought.

The Plan fails to fully acknowledge the impacts of two inevitable climate change outcomes: sea level rise and drought. Between now and 2040, sea level rise and drought are likely to deter the planned growth in major areas of the Region; the Plan does not appear to offer any contingency plan.

The foreseeable water issues that must be addressed include:

- Major infrastructure already faces inundation dangers, which is likely to impede PDA development in some areas. For example, the well-documented closing of State Highway 37 in the northern counties due to this past winter’s floods.

- Drought and sea level rise will put stress on water supplies, especially from the Delta. Several PDAs on the Peninsula are already stymied by lack of water supply. The Plan and DEIR should analyze how and if these water supplies can be secured.

- Drought will exacerbate water supply issues and result in water-related growth restriction in additional communities.

7. The Plan DEIR Should Better Address Quality of Life.

The Plan does not adequately preserve and enhance the quality of life factors that have made the Region so desirable. A Bay Area Ambient Air Quality Management District study forecasts pollution to worsen, especially in basins such as Livermore and near freeways and industrial facilities, leading to adverse health impacts.

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41 PBA 2040, p. 65.
42 Equity Analysis, p. 5-2, Table 5-1, Item 5; see also p. 5-1, Analysis of Equity Measures No. 2.
43 DEIR, p. 2.2-2.
44 DEIR, pp. 2.2-9, 23.
The Plan envisions that open space will be located where the air pollution problem is minimized by distance\textsuperscript{45} and anticipates substantial legislative and regional cooperation for mitigation, but it fails to define implementation. The Plan is expected to deteriorate trail networks where they exist\textsuperscript{46} with no performance criteria for mitigation or alternatives.

8. **The Plan Should Consider Goods Movement on the “M-580 Marine Highway.”**

Sierra Club remains disappointed at MTC’s refusal to consider opportunities presented by the Port of Stockton’s “M-580 Marine Highway” approach to Goods Movement improvement. While, overall, Sierra Club policy favors transport of non-hazardous cargo by rail rather than by truck, Sierra Club believes that innovative approaches such as transferring goods to barge transport should be considered as an alternative.

**CONCLUSION**

The Plan and DEIR should be changed in accordance with the comments in this letter.

Sincerely,

William Rostov

\textsuperscript{45} DEIR, p. ES-17.

\textsuperscript{46} DEIR p ES-19, Impact 2.3-2.
Below is the comment you selected to display.

Comment 34 for Update to the Senate Bill 375 Greenhouse Gas Emission Reduction Targets and Environmental Analysis (sb375update2017) - Non-Reg.

First Name: Laura
Last Name: Rosenberger Haider
Email Address: lauragreen.rosenberger@gmail.com
Affiliation:

Subject: California will cause non-compliance of other states
Comment:
Construction of the High Speed Rail (HSR) will admit particulate pollution. Sand mining for cement for the HSR may possibly release sulfur pollution. Cement companies will release green house gas emissions and VOC's from cement manufacturing. The sand mines may release sulfur and silica. We need clean air to do active transportation like bicycling. Some of the pollution previously mentioned will blow into other states. California should not cause other states to be in non-compliance.

Attachment:
Original File Name:

Date and Time Comment Was Submitted: 2017-07-28 16:53:29

If you have any questions or comments please contact Clerk of the Board at (916) 322-5594.

Board Comments Home
Hi Lezlie,

If staff hasn’t already done so, I recommend staff analyze the environmental effects of the following legislation in its final environmental analysis to be presented to the Board for the proposed Update to the Senate Bill 375 Greenhouse Gas Emission Reduction Targets.

**AB 2299**, Bloom. Land use: housing: 2nd units

**SB 1069**, Wieckowski. Land use: zoning

See link below for an overview of these new State laws.
Source: [http://www.hcd.ca.gov/policy-research/docs/2016-12-12-ADU-TA-Memo.docx.pdf](http://www.hcd.ca.gov/policy-research/docs/2016-12-12-ADU-TA-Memo.docx.pdf)
Source: [http://www.hcd.ca.gov/policy-research/AccessoryDwellingUnits.shtml](http://www.hcd.ca.gov/policy-research/AccessoryDwellingUnits.shtml)

The State legislature intended this and other similar legislation to satisfy the State’s housing shortfall and affordable housing needs through provision of Accessory Dwelling Units (ADUs).

Depending on the source, the State’s existing housing shortfall is between 1-2 million units.

This legislation effective January 1, 2017 represents a change in circumstances with a potentially significant growth inducing impacts. It affects existing, as well as future development. For example, in December 2016 the City of Los Angeles estimated there are 486,000 single-family residential properties within the city that could construct an ADU, subject to obtaining a building permit.

(Source: Department of City Planning Recommendation Report, December 15, 2016 [https://planning.lacity.org/ordinances/docs/ADU/StaffRpt.pdf](https://planning.lacity.org/ordinances/docs/ADU/StaffRpt.pdf))

I am unaware of any City or County General Plan, water purveyor or association of governments who has analyzed the environmental effects of this legislation in their future plans.

This is a difficult analysis.

I may be able to assist, feel free to call if you have questions.

Thanks,

Dave

David J. Tanner, President
Environmental & Regulatory Specialists, Inc.
223 62nd Street
Newport Beach, CA 92663
949 646-8958 wk
949 233-0895 cell
Hi Heather,

Thank you for your response.

If it is not too late to provide comments, in addition to considering the growth inducing impacts of AB 2299 and SB 1069, I recommend staff analyze the environmental effects of the following legislation below enacted in 2017 in its final environmental analysis to be presented to the Board for the proposed Update to the Senate Bill 375 Greenhouse Gas Emission Reduction Targets. Viewed as a whole, these twenty (20) bills seek to stimulate housing development throughout the state. There is a direct link between new residential development and generation of GHG emissions.

ADUs as defined in AB 2299, SB 1069, AB 2406 and AB 494 are different than second units, granny flats, etc. defined in prior legislation. Among the differences:

- These bills are designed to remove the regulatory and financial hurdles to stimulate new ADUs and affordable priced housing.
- Local governments must ministerially approve ADUs under certain conditions; and
- New housing developments could elect to have up to a 100% density bonus exempt from CEQA if the developer and/or property owner elected to construct and ADU(s) after approval of the projects CEQA document.

While predicting the reasonable effectiveness of these bills on housing stocks over time in a CEQA document will be speculative, the alternative, total dismissal of these bills effect on housing stocks statewide over time as speculative in a CEQA document would not be reasonable and in my opinion not defensible.

- Please have staff cite and justify the appropriateness of vehicular trip generation rates and trip lengths used in its calculation of GHG emissions from ADUs in its response to comments and in the final environmental document. For maximum defensibility, I recommend staff utilize actual vehicle trip generation rates/counts from a range of existing ADUs in sample locations throughout the study area.

Summary of 2017 Assembly and Senate Bills

**AB 2299** and **SB 1069** (provided in prior comment)

**Assembly Bill No. 2406** - The Planning and Zoning Law authorizes a local agency to provide by ordinance for the creation of 2nd units in single-family and multifamily residential areas, as prescribed.

This bill would, in addition, authorize a local agency to provide by ordinance for the creation of junior accessory dwelling units, as defined, in single-family residential zones. The bill would require the ordinance to include, among other things, standards for the creation of a junior accessory dwelling unit,
required deed restrictions, and occupancy requirements. The bill would prohibit an ordinance from requiring, as a condition of granting a permit for a junior accessory dwelling unit, additional parking requirements.

Assembly Bill No. 494 - The Planning and Zoning Law authorizes a local agency to provide by ordinance for the creation of accessory dwelling units in single-family and multifamily residential zones, as specified. That law requires the ordinance to require the accessory dwelling unit to comply with certain conditions, including, but not limited to, that the accessory dwelling unit is not intended for sale separate from the primary residence and may be rented.

This bill would revise that condition to provide that the accessory dwelling unit may be rented separately from the primary residence.

Existing law provides that no setback be required for an existing garage that is converted to an accessory dwelling unit, as specified.

This bill also would provide that no setback be required for an existing garage that is converted to a portion of an accessory dwelling unit.

Existing law requires that parking requirements for accessory dwelling units not exceed one parking space per unit or per bedroom and allows required parking spaces to be provided as tandem parking on an existing driveway. Existing law also requires specified offstreet parking to be permitted for an accessory dwelling unit unless, among other things, that specified offstreet parking is not allowed anywhere else in the jurisdiction. When a garage, carport, or covered parking structure is demolished in conjunction with the construction of an accessory dwelling unit, and the local agency requires that those offstreet parking spaces be replaced, existing law allows, with specified exceptions, the replacement spaces to be located in any configuration, including as tandem parking, on the same lot as the accessory dwelling unit.

This bill instead would require that parking requirements for accessory dwelling units not exceed one parking space per unit or per bedroom, whichever is less. The bill would define tandem parking for these purposes and would also allow replacement parking spaces to be located in any configuration if a local agency requires replacement of offstreet parking spaces when a garage, carport, or covered parking structure is converted to an accessory dwelling unit. This bill would remove the prohibition on specified offstreet parking where that parking is not allowed anywhere else in the jurisdiction.

Existing law requires ministerial, nondiscretionary approval of an application for a building permit to create within a single-family residential zone one accessory dwelling unit per single-family lot if the unit is contained within the existing space of a single-family residence or accessory structure and specified other conditions are met.

This bill would provide that for these purposes, an accessory structure includes a studio, pool house, or other similar structure. The bill would also authorize a city to require owner occupancy for either the primary or the accessory unit created through this process.

This bill would incorporate additional changes to Section 65852.2 of the Government Code proposed by SB 229 to be operative only if this bill and SB 229 are enacted and this bill is enacted last.
**Senate Bill No. 229** - This bill would authorize a local agency to provide by ordinance for the creation of accessory dwelling units in areas zoned to allow single-family or multifamily use. The bill would authorize the ordinance to prohibit the sale or other conveyance of the unit separate from the primary residence. The bill would extend the use of the maximum standards to a proposed accessory dwelling unit on a lot zoned for residential use that includes a proposed single-family dwelling.

(2) Existing law authorizes the location of required replacement parking spaces in any configuration on an accessory dwelling unit lot when a garage, carport, or covered parking structure is demolished in conjunction with the construction of an accessory dwelling unit.

This bill would extend this authorization to when the garage, carport, or covered parking structure is converted to an accessory dwelling unit. The bill would also define tandem parking for these purposes.

(3) Existing law prohibits an accessory dwelling unit from being considered a new residential use for the purposes of calculating local agency connection fees or capacity charges for utilities, including water and sewer service. Existing law prohibits, for an accessory dwelling unit constructed in an existing space, a local agency from requiring the applicant to install a new or separate utility connection directly between the accessory dwelling unit and the utility and from imposing a related connection fee or capacity charge.

This bill would extend the applicability of both of the above prohibitions to special districts and water corporations.

(4) Existing law requires a local agency that has adopted an ordinance authorizing the creation of accessory dwelling units to submit a copy of the ordinance to the Department of Housing and Community Development within 60 days of adoption of the ordinance.

This bill would authorize the department to review and comment on an ordinance submitted to the department pursuant to these provisions.

*(Description following SB 2 thru AB 72 below)*


**Senate Bill 2** - the $75 real estate transaction fee, and

**Senate Bill 3** - the $4-billion housing bond, would go toward helping pay for the development of new homes for low-income residents.

**Senate Bill 35** - forces cities to approve projects that comply with existing zoning if not enough housing has been built to keep pace with their state home-building targets.

**Assembly Bill 73** - a city receives money when it designates a particular community for more housing and then additional dollars once it starts issuing permits for new homes.

**Senate Bill 540** - authorizes a state grant or loan for a local government to do planning and environmental reviews to cover a particular neighborhood. Developers in the designated community also will have to reserve a certain percentage of homes for low- and middle-income residents and the city’s approvals there would be approved without delay.
Assembly Bill 1505 - changes the rules so that cities can once again implement low-income requirements. San Jose already is considering a policy that would force developers to set aside 15% of their projects.

Assembly Bill 1521 - requires owners to accept a qualified offer to purchase the apartment complex from someone who pledges to continue renting the homes to low-income residents.

Assembly Bill 571 - expands that effort with an eye toward making it easier for developers to bundle it with other sources to build farmworker housing.

Assembly Bill 1397 - forces local governments to zone land for housing where it could actually go, instead of putting sites they don’t intend to approve in their housing plan.

Senate Bill 166 - makes cities add additional sites to their housing plans if they approve projects at densities lower than what local elected officials had anticipated in their proposals. The goal is to make up for the housing units that weren’t built.

Assembly Bill 879 - instructs cities to analyze how long it takes developers to actually build their projects once they've been approved, and then take steps to shorten that time.

Senate Bill 167, Assembly Bill 678 and Assembly Bill 1515, will beef up the existing law by making it easier for developers to prove a city acted in bad faith when denying a project, and by upping a city’s penalty to $10,000 per unit they rejected.

Assembly Bill 72 gives the state housing department more authority to investigate cities that don’t follow through with their housing plans and refer cases to California’s attorney general for possible legal action.

Feel free to call if you have questions or need assistance.

Thanks,
Dave

David J. Tanner, President
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February 8, 2018

BY EMAIL AND U.S. MAIL

Lezlie Kimura Szeto
Sustainable Communities Policy and Planning Section Manager
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, California 95812
Lezlie.Kimura@arb.ca.gov

Re: Coordinating SANDAG’s SB 375 GHG Emissions Reduction Targets with County of San Diego GHG and Land Use Policy

Dear Ms. Kimura Szeto:

We represent Golden Door Properties, LLC (“Golden Door”), a world-class spa, resort, and agricultural operation in the rural Twin Oaks Valley area of San Diego County. The Golden Door is committed to environmental stewardship and sustainability, and is proud that California is a leader in efforts to reduce greenhouse gas (“GHG”) emissions to combat the threat of global climate change. We appreciate the California Air Resources Board’s (“CARB”) efforts to implement aggressive policies to meet the State’s GHG reduction targets.

We write in regard to San Diego’s proposed Climate Action Plan (“CAP”), the San Diego Association of Governments’ (“SANDAG”) Regional Transportation Plan/Sustainability Communities Strategy (“RTP/SCS”), and CARB’s SB 375 targets. If the County approves its CAP without changes next week, it would allow unlimited sprawl development with developers purchasing carbon offset credits from anywhere in the world rather than pursuing local trip length reductions or smart growth planning. SANDAG must analyze this proposal now to know how regional trip length forecasts will be impacted and if it will be able to meet CARB’s current and proposed emissions reduction targets.

We understand that as part of efforts to achieve GHG-reductions in the transportation sector through SB 375, CARB is recommending increased GHG reduction targets for SANDAG. We are concerned, however, that CARB must carefully consider the ability of SANDAG to even meet existing GHG reduction targets in light of the County of San Diego’s most recent land use planning and GHG-reduction policies which will likely interfere with SANDAG’s ability to meet CARB’s current SB 375 targets.
CARB has repeatedly emphasized that it believes a reduction in vehicle miles traveled ("VMT") is a key component of reducing GHG emissions in order to meet statewide GHG reduction goals. The County’s pending CAP, set to be considered by the County Board of Supervisors on February 14, 2018, would allow the addition of sprawl development without corresponding reductions in VMT. In addition, County staff and elected officials have suggested in public forums that VMT is not a viable metric for GHG emissions reduction efforts.

As such, we request that CARB coordinate with SANDAG and the County before the County fast tracks sprawl development projects without regard for CARB’s more stringent GHG reduction targets. CARB’s targets are rightly predicated on smart growth land use planning. At this time, however, no analysis has been provided to determine whether SANDAG could meet these targets if the underlying land use assumptions are changed to match proposed new County policies which will deviate from the current County General Plan land use patterns used in the most recent RTP/SCS.

Put simply, if the County decides that it no longer cares about VMT as a metric for its General Plan policies, this will put SANDAG in the impossible position of attempting to meet VMT reduction targets in the face of the County’s plan to allow unlimited new development in rural areas so long as GHG offsets are purchased from some location around the globe. Neither the County nor SANDAG has provided an analysis of the specific VMT impacts from new proposed County General Plan changes included in the EIR for the County’s CAP. The County did not re-run SANDAG’s model with the sprawl projects being currently processed by the County that are not included in SANDAG’s model, which was based on the 2011 County General Plan and used for the 2015 SANDAG RTP/SCS.

Only by running this model can CARB and SANDAG determine whether SANDAG can meet its current SB 375 targets or CARB’s recommendation for more stringent targets in light of the County’s pending General Plan changes. Now is the time to provide such analysis to the public and decision makers and to coordinate CARB’s, SANDAG’s, and the County’s efforts to ensure San Diego County does its fair share to help the State meet its GHG emissions reduction targets.

I. CARB’S 2017 SCOPING PLAN AND SB 375 TARGETS EMPHASIZE THE IMPORTANCE OF VMT REDUCTIONS

In October 2017, CARB proposed updates to regional passenger GHG emissions reduction targets for California’s metropolitan planning organizations (“MPOs”). In December 2018, CARB approved an updated Climate Change Scoping Plan Update to address the use of GHG offset credits. Both documents emphasize the need to reduce VMT in order to meet statewide climate change goals.

A. CARB’s Staff Proposal for Increasing MPOs’ SB 375 GHG Emissions Reduction Targets

CARB staff has recommended increased GHG emissions reduction targets under SB 375 for the State’s MPOs and has emphasized the importance of VMT reduction in reaching those
targets. CARB staff is currently holding public workshops about the recommended target increases prior to CARB Board consideration early this year.

The revised targets call for “greater per capita GHG emission reductions from SB 375 than are currently in place, which for 2035, translate into targets that either match or exceed the emission reduction levels contained in the MPOs’ currently adopted SCSs. CARB staff believes that to achieve the intent of the legislation and to maximize community co-benefits, the per capita GHG emission reduction targets should be achieved predominantly through strategies that reduce VMT.” (CARB SB 375 Staff Proposal at p. 19.) In fact, “CARB’s recommended targets are equivalent to reducing VMT a half a mile per person per day.” (Id. at p. 28.) CARB recognized that SB 375 and other VMT reduction strategies “need to provide a 25 percent reduction in statewide per capita greenhouse gas emissions relative to 2005 by 2035” to meet the statewide goals. (Id. at p. 29.) For SANDAG, CARB staff has recommended a 2035 reduction target of 21%, which is higher than the 2035 target in SANDAG’s current RTP/SCS and higher than the 18% target requested by SANDAG.

B. CARB 2017 Scoping Plan Update

CARB’s 2017 Scoping Plan Update emphasizes the importance of reducing VMT as an integral component of GHG emissions reductions efforts:

To the degree a project relies on GHG mitigation measures, CARB recommends that lead agencies prioritize on-site design features that reduce emissions, especially from VMT, and direct investments in GHG reductions within the project’s region that contribute potential air quality, health, and economic co-benefits locally. For example, on-site design features to be considered at the planning stage include land use and community design options that reduce VMT, promote transit oriented development, promote street design policies that prioritize transit, biking, and walking, and increase low carbon mobility choices, including improved access to viable and affordable public transportation, and active transportation opportunities. Regionally, additional GHG reductions can be achieved through direct investment in local building retrofit programs that can pay for cool roofs, solar panels, solar water heaters, smart meters, energy efficient lighting, energy efficient appliances, energy efficient windows, insulation, and water conservation measures for homes within the geographic area of the project.

(CARB, 2017 Climate Change Scoping Plan at p. 102 [emphasis added].) CARB’s 2017 Scoping Plan Update also emphasizes the need to address VMT as an integral piece of GHG mitigation. “CARB staff is more convinced than ever that, in addition to achieving GHG reductions from cleaner fuels and vehicles, California must also reduce VMT.” (CARB, 2017 Climate Change Scoping Plan at p. 101 [emphasis added].) Further, the 2017 Scoping Plan Update emphasizes the co-benefits of VMT reduction, including reduction of toxic air pollutants,
improved public health, decreased traffic congestion, and increased environmental justice. These important quality of life factors are important to consider along with the GHG emissions reduction benefits of policies to reduce VMT.

II. THE COUNTY’S CAP INCLUDES AN OFFSET PROGRAM ALLOWING APPROVAL OF SPRAWL DEVELOPMENT WITHOUT APPROPRIATE REDUCTIONS IN VMT

The County’s CAP proposes a mitigation program for General Plan Amendment projects (Mitigation Measure GHG-1) that relies on the purchase of carbon offset credits from anywhere in the world. Mitigation Measure GHG-1 does not require VMT reduction. Mitigation Measure GHG-1 also does not require consistency with SANDAG’s RTP/SCS, which is the region’s plan for achieving GHG reductions by reducing VMT consistent with State law and CARB’s targets.

SANDAG’s RTP/SCS model for the unincorporated County is based on land use inputs from the County’s approved 2011 General Plan Update (“2011 GPU”). The land use designations in the 2011 GPU are the product of over a decade of community input and stakeholder negotiations and are generally considered to adhere to smart growth principles of locating density near existing infrastructure and transit. Any amendment to the County’s 2011 GPU would necessarily alter the VMT modelling performed by SANDAG to determine its VMT reductions in the current RTP/SCS. General Plan Amendments proposed on unincorporated County lands typically require densification of rural lands farther from existing infrastructure and transit than the 2011 GPU’s planned density.

For example, the Newland Sierra project is a proposed General Plan Amendment being processed by the County that would add over 2,100 homes to an area currently zoned for 99 homes and is located between Escondido and the Riverside County line more than six miles from the nearest transit center. The General Plan Amendments proposed in the unincorporated County necessarily add long vehicle trips over and above those considered in the RTP/SCS model, which relied on the 2011 GPU’s land use designations. The County’s CAP does not consider project siting or VMT reduction strategies as mitigation for General Plan Amendment projects; instead, the CAP allows the General Plan Amendment projects to meet their GHG mitigation requirement by merely purchasing carbon offset credits from anywhere in the world. The County has not analyzed the impacts of this approach on County-wide VMT or on SANDAG’s ability to meet its SB 375 requirements.

1 Mitigation Measure GHG-1 provides geographic priorities for these offset projects, beginning with 1) project design features/on-site reduction measures; 2) off-site within the unincorporated areas of the County of San Diego; 3) off-site within the County of San Diego; 4) off-site within the State of California; 5) off-site within the United States; and 6) off-site internationally. No defined criteria is provided to determine the proportion of mitigation to be achieved each priority level. (CAP Final Supplemental Environmental Impact Report at p. 8-52.) At a County Planning Commission meeting on January 18, 2018, County staff indicated that such determinations would be made by staff after project approval and without public review.
SANDAG has analyzed the impact of aggressive land use policies to increase densification and determined that these policies would have minimal benefit for GHG emissions reduction efforts. Neither SANDAG nor the County, however, has analyzed the impacts of a less dense development pattern on unincorporated County lands and how such sprawl planning would inhibit VMT-reduction efforts. Yet, the County’s CAP – expected to be approved by the Board of Supervisors next week – would pre-approve a GHG mitigation program for sprawl projects that relies on purchasing carbon offset credits while ignoring local VMT reduction and consistency with SANDAG’s VMT-reduction plans.

As CARB considers increasing SANDAG’s GHG emissions reduction targets, it should coordinate with SANDAG and the County to understand how policies currently under consideration by the County would impact SANDAG’s ability to meet its existing and proposed emissions reduction requirements and ensure the public and decision makers are informed about the interrelation between these agencies’ GHG reduction efforts.

III. COUNTY STAFF AND THE BOARD OF SUPERVISORS HAVE SUGGESTED THE COUNTY WILL DISREGARD CARB’S VMT REDUCTIONS DIRECTIVE

Recent public statements from County Supervisor Ron Roberts and County Planning Director Mark Wardlaw indicate an approach that supplants VMT reduction measures with vehicle and fuel technology programs. At the CARB Board of Directors meeting approving the 2017 Scoping Plan Update, San Diego County Supervisor Ron Roberts, who is also a member of the CARB Board, vehemently opposed the use of VMT as a metric:

“I think it’s one of the worst metrics. I said that when I was first here in 1995. It’s a pathetic metric for anything. It’s a political metric. It’s not a performance metric. As we increasingly electrify vehicles, cars, and trucks, and buses, and everything else, you’ll see that clearly. And I think you’ll still — I think you’ll see it today. We’ve seen it in San Diego County the relationship is an inverse one. And there’s a lot of reasons for that. And this Air Board has been a strong part of that, and I’m very proud that that’s the case. But I think it’s something that we need to have a better understanding. And when you’re measuring the wrong thing, it seems to me your chances of success are far more limited. So I’ve registered that concern in the past. A lot of people keep hanging their hat on it.”

(CARB Board of Directors Meeting Transcript, December 14, 2017 at p. 80:6-21.)

In addition, at the San Diego County Planning Commission’s January 18 hearing on the CAP, Planning Director Mark Wardlaw stated that “electric vehicle and fuel cell vehicle programs shift that fuel from the carbon-based to a non-carbon-based which addresses the intent of VMT reduction.”
These comments by Supervisor Roberts and Director Wardlaw indicate a lack of concern regarding increased VMT within San Diego County from sprawl development projects. This approach contradicts CARB’s emphasis on reducing VMT as an integral component of meeting the State’s GHG emissions reduction targets. We encourage CARB to coordinate with SANDAG and the County to ensure VMT reductions remain a priority in land use planning and GHG mitigation. If VMT is to be discarded as a guidepost for GHG emission reduction policies in San Diego County or Statewide – as is preferred by Supervisor Roberts and Director Wardlaw – analysis of this policy shift should be performed and presented to the public and decision makers prior to implementation.

IV. CARB SHOULD COORDINATE WITH SANDAG AND THE COUNTY TO ENSURE SANDAG CAN MEET ITS SB 375 EMISSIONS REDUCTION TARGETS

In light of the comments from San Diego County land use planning officials and the CAP’s sprawl-facilitating GHG mitigation program, more must be done to ensure coordination between the County and SANDAG. The County continues to fast track sprawl development – all while SANDAG seeks to meet increasingly stringent GHG reductions targets predicated on smart growth land use planning. SANDAG should request that the County run the same model SANDAG used for its RTP/SCS to evaluate the CAP’s proposals. This model run should take into account cumulative impacts from General Plan Amendment projects that could be approved using Mitigation Measure GHG-1’s offset program. The cumulative projects should include at least all General Plan Amendment proposals currently in process with the County, including the proposed Newland Sierra project – which published its draft EIR prior to publication of the Draft CAP. This is the only way to inform decision makers and the public of the CAP’s potential impacts on County-wide VMT and ensure that SANDAG meet its SB 375 mandated targets. Only this analysis can demonstrate whether the CAP is consistent with SANDAG’s VMT reduction plans in its RTP/SCS pursuant to SB 375.

Prior to the adoption of the new SB 375 targets, SANDAG must let CARB know if it cannot meet its VMT reduction goals due to the County’s land use planning and insistence on considering sprawl development projects. If the County chooses to ignore VMT, there must be further coordination, disclosure, and understanding such that the State may weigh in on the County’s approach and provide necessary guidance so that San Diego County can do its fair share to help the State meet its GHG emissions reduction targets.

Thank you for your time and attention to our comments. Please do not hesitate to contact us should you have any questions or comments.

Best regards,

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