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File Number 3330300

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

To Whom It May Concern:

SUBJECT: 2017 Climate Change Scoping Plan Update and Draft Environmental Analysis

MEMBER AGENCIES

- Cities of
- Carlsbad
- Chula Vista
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- San Marcos
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- and
- County of San Diego

The San Diego Association of Governments (SANDAG) appreciates the opportunity to comment on the 2017 Climate Change Scoping Plan Update (Scoping Plan Update) and Draft Environmental Analysis (EA). SANDAG appreciates the time and effort that staff from the Air Resources Board (ARB) has taken to conduct outreach regarding the Scoping Plan Update. SANDAG's comments are outlined below.

Sustainable Communities Strategy

It is important to acknowledge the relationship among Sustainable Communities Strategies (SCSs) and local land use plans and transportation investments. SANDAG suggests editing the following sentence on page ES7 to better emphasize this relationship as follows:

"The SB 375 Sustainable Communities Strategies and regional local land use and local transportation investments Climate Action Plans work together to support safer streets, more opportunities for walking and biking, improved transit options, more efficient land use and more vibrant communities."

ADVISORY MEMBERS

- Imperial County
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SANDAG also suggests the following edits on page 18 to maintain a consistent definition of SCS:

"These efforts are already underway, as highlighted through the development and implementation of Sustainable Communities Strategies (SCSs) pursuant to Senate Bill (SB) 375, which link contain transportation, housing, and land use strategies that, if implemented, would allow the region to meet its climate policy, and are designed to reduce per capita GHG emissions from passenger vehicles, while providing benefits ranging from improved air quality and expanded transportation options to revitalization of city centers and investment in disadvantaged communities. SB 375 is just one of many ways to address housing and transportation needs and..."

Throughout the document, there are a number of references to Senate Bill (SB) 375 being unable to provide the necessary Vehicle Miles Traveled (VMT) reductions to achieve the 2030 greenhouse gas (GHG) reduction target; SANDAG agrees that SB 375 alone will not be able to provide these reductions. Additionally, SB 375 only requires that per capita GHG targets be met, not VMT reduction targets. SANDAG suggests updating any SB 375 references to refer to GHG targets (as opposed to VMT reductions).

Proposed Scoping Plan Scenario

Table II-1 (page 34) highlights proposed requirements for Advanced Clean Transit, stating that “20 percent of new urban buses purchased beginning in 2018 will be zero emission buses, ramping up to 100 percent of new sales in 2030.” SANDAG is supportive of the adoption of zero emission buses, but the requirements placed on transit operators to meet the proposed goals are challenging, especially when considering the significant costs of fleet conversion and long-term fleet maintenance. Such significant compliance costs could force transit operators to cut service and/or increase fares. SANDAG is in favor financial incentives for voluntary pilot programs to continue to test the technology used for operation of zero emission buses until the technology is shown to be durable and reliable enough for large-scale, cost-effective deployment.

Estimated Greenhouse Gas and Air Pollution Reductions

Table III-1 on page 57 identifies estimated GHG reductions from various Scoping Plan policy measures, but does not include an estimate for SB 375 reductions. SANDAG suggests clearly identifying the amount of reductions that can be achieved under statewide implementation of SB 375. Reductions from statewide regional targets were included in the previous Scoping Plan, and this information should be included to ensure consistency.

Key Sectors

SANDAG suggests the following edits to Chapter IV (Key Sectors):

- Suggest editing the last sentence of the first paragraph on page 102 to read as follows: “The State can provide guidance and tools and funding to assist local governments, MPOs, transit agencies, and others in achieving those objectives.”
- While SANDAG is supportive of state goals to deploy electrified rail vehicles, we suggest that the Scoping Plan acknowledge some of the challenges and constraints that may be associated with such deployment. For example, it is not clear how such deployment would be funded or what agencies would be responsible. In addition, the Los Angeles–San Diego–San Luis Obispo (LOSSAN) rail corridor is located along the coast of the San Diego region and traverses six coastal cities. In the past, these communities have been concerned with electrification and its potential impacts on coastal views and community character. Electrification also could potentially require that railroad overcrossings be reconstructed or removed in order to provide the necessary clearance for overhead catenary wires.
- Suggest clarifying the first bullet on page 105 (discussing the Mobile Source Strategy). As written, it is not clear what the 15 percent reduction is from; this should be revised to state that the 15 percent reduction for 2050 is relative to a baseline 2050 scenario.

- Suggest clarifying and re-wording the second bullet on page 116. Please provide more information as to what a “regional transportation and development plan” is. Furthermore, regional agencies do not typically have authority to regulate many GHG sources typically included in climate action plans (e.g., electricity generation and consumption, natural gas consumption, industry, land use and zoning, building design and construction, aviation, marine).

Local Plan-Level Greenhouse Gas Emissions Reductions Goals

The recommended goals for local governments (described on page 134 and footnote 196) are not appropriate for all cities, counties, subregional, or regional levels for the same reason the Scoping Plan asserts they are not appropriate for specific individual projects: These goals are based on all emissions sectors in the State. Recommending that each local government or region includes an equal share of the state’s goals assume that each local government or region includes an equal share (or at least some share) of the state’s emissions sources. However, all emissions sectors in the state are not distributed equally among the various local governments and regions of the state. For example, while the Proposed Scoping Plan Scenario relies in part on a 20 percent reduction in GHG emissions from the refinery sector to achieve the 2030 goal, local governments or regions without refineries in their jurisdiction would not be able to take into account reductions from the refinery sector when they prepare Climate Action Plans (CAPs). Similarly, to the extent the Low Carbon Fuel Standard (LCFS) achieves GHG reductions “upstream” in the transportation fuel lifecycle (i.e., reductions occur before the tailpipe), local governments or regions may not be able to rely on reductions from the LCFS, unlike ARB in its Proposed Scoping Plan Scenario. The same logic could apply to other proposals, such as measures to reduce short-lived climate pollutants (some jurisdictions do not include sources of highly potent GHGs) and measures related to freight efficiency (some local governments and regions will include less freight travel relative to others).

Furthermore, it is not appropriate for ARB to recommend a target for 2050 when the state’s own planning does not go beyond 2030. When local governments or regions prepare CAPs or forecast future GHG emissions, their estimates of future GHG emissions take into account the implementation of policy measures at all levels of government: federal, state, regional, and local. If a local government or region is preparing a CAP or GHG forecast for 2050, and the adopted Scoping Plan extends only to 2030, then that local government or region would have to come up with its own measures to meet the 2050 goal in order to demonstrate compliance with the statewide 2050 target. Neither local nor regional governments have the legal or regulatory authority over all GHG emissions sources or the fiscal resources to achieve the magnitude of GHG reduction needed to meet the 2050 goal of two Metric Tons Carbon Dioxide Equivalent (MTCO_{2e}) per person.

In addition, it would be inefficient and impractical to put the burden of meeting the 2050 goal on individual local or regional governments by asking them to pursue measures to achieve this goal ahead of the planning performed by the state government; different jurisdictions could pursue inefficient or conflicting policies that inhibit achieving statewide progress toward the 2050 goal. Instead, local and regional governments should work together with the state to develop complementary policies and measures for post-2030. ARB should not recommend local government targets that are farther into the future than their own targets. For these reasons, it is not appropriate to recommend a target beyond 2030 until ARB develops a Scoping Plan that extends beyond 2030.

Project-Level Greenhouse Gas Emissions Reduction Actions and Thresholds

SANDAG suggests revising the following statement on page 136:

“...CARB recommends that all new land use development implement all feasible measures to reduce GHG emissions [where there is no adequate climate plan to tier from].”

This goes above and beyond existing California Environmental Quality Act (CEQA) mitigation measure requirements (e.g., CEQA Guidelines Section 15126.4). Because this statement is provided in the context of a discussion about CEQA, SANDAG suggests revising this statement to reflect existing CEQA requirements for mitigation measures. CEQA only requires feasible mitigation measures for significant impacts.

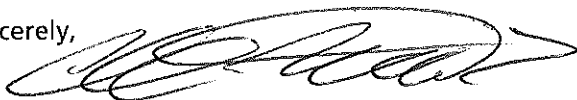
Transportation Demand Management

Please consider expanding upon the traditional Transportation Demand Management (TDM) strategies presented in the proposed Scoping Plan and incorporate emerging technologies and shared mobility services that support the Scoping Plan’s goals for expanding multi-modal transportation choices and reducing GHG emissions associated with single-occupant vehicle trips. Additional strategies to consider include:

- Encourage local government agencies to adopt TDM ordinances and integrate TDM into the development review process to promote transit oriented communities and private investment in multi-modal infrastructure and services.
- Encourage local governments to implement Transportation System Management and Information Technology System improvements to reduce traffic congestion.
- Encourage the adoption of shared mobility services. Examples of shared mobility services include carsharing, bikesharing, real-time ridesharing (Transportation Network Companies), scootershare, shared neighborhood electric vehicles, and on-demand shuttle and jitney services.
- Consider emerging transportation technologies and promote policies that support a shared, electric and autonomous vehicle future.
- Promote the adoption of regional mobility hub concepts. Mobility hubs integrate shared transportation services and technologies with public transit reducing the need for a private automobile. Mobility hubs build upon Transit Oriented Development and provide a range of shared services and technologies including bikeshare, carshare, neighborhood electric vehicles, bike parking, dynamic parking management strategies, real-time traveler information, real-time ridesharing, demand-based shuttle services and supporting systems like mobile applications, electric vehicle charging, smart intersections, and a universal payment system to make it easy to access a wide range of travel choices.

Thank you for the opportunity to comment on The Scoping Plan. If you have any questions or comments, please contact me at (619) 699-6945 or via email at muggs.stoll@sandag.org.

Sincerely,



CHARLES “MUGGS” STOLL
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