

July 8, 2016

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

Re: Comments on ARB's 2030 Target Scoping Plan Concept Paper (SP-CONCEPT-PAPER-WS).

Dear Chair Nichols:

Thank you for the opportunity to comment on the California Air Resources Board's (ARB) 2030 Target Scoping Plan Concept Paper. As the Metropolitan Planning Organization and Regional Transportation Planning Agency for Santa Barbara County, the Santa Barbara County Association of Governments (SBCAG) is interested in providing feedback on the concept paper and the potential implications for our agency and the local partner jurisdictions that we serve.

Following are SBCAG's comments in response to the concept paper.

1. Provide Additional Detail and Consider Limitations of SCSs:

The Concept Paper relies on vague, general language, which lacks substance and specificity. In discussing the role of SB 375 in the various concepts considered, ARB uses vague terms such as "increased stringency of SB 375 Sustainable Communities Strategy – 2035 Targets" (Concept 1), "more ambitious targets of SB 375 Sustainable Communities Strategy – 2035 Targets" (Concept 2), and "ambitious stringency of SB 375 Sustainable Communities Strategy – 2035 targets" (Concept 3) to describe the relative "stringency" of the SB 375 targets and corresponding reductions ARB hopes to achieve through sustainable communities strategy (SCS) implementation. These vague terms do not provide detail or specificity as to what target levels ARB has in mind for the various concepts considered.

It is of fundamental importance for ARB to recognize the inherent limitations on what reductions can be achieved by the implementation of locally adopted SCSs. SBCAG's demographic modeling work to date indicates that, while SCSs can achieve significant per capita reductions in GHG emissions from passenger vehicles, they do not result in reductions in absolute terms. In the face of population growth (and controlling for technology-driven emission reduction measures), even the most ambitious land use and transportation scenarios result only in reducing the rate of growth of GHG emissions.

These limitations are due in part to real physical and practical constraints to accommodating forecast growth. In addition, lack of land use authority at the regional level, need for broad

political consensus at all levels of government, limitations posed by the existing built environment and urbanization patterns, and transportation funding limitations all constrain what SCSs can achieve. If SB 375 targets are set too ambitiously and MPOs' cannot demonstrate how they can be met within physical and funding constraints, then MPOs will be forced to consider Alternative Planning Strategies in lieu of SCSs, which would be counter-productive to achieving overall GHG reduction goals.

2. Keep Focus on GHG Reduction:

The Concept Paper couples GHG reductions with public health benefits, particularly environmental equity issues affecting disadvantaged communities. However, encouraging more housing in disadvantaged communities far away from existing jobs centers may be doubly counter-productive: exposing more people to pollutants as well as increasing average VMT and therefore GHG emissions. The Concept Paper suggests that disadvantaged communities are also frequently subject to elevated pollutant levels. Assisting disadvantaged communities is a worthy goal, but it must be accomplished in a way that simultaneously serves the overarching goal of GHG reduction, or at least does not work at cross-purposes. The focus of the Scoping Plan should be on the primary goal of emissions reduction, with environmental equity as a co-benefit.

Requiring investment of Greenhouse Gas Reduction Fund (GGRF) proceeds directly within delineated disadvantaged communities may result in an inefficient misallocation of resources that neither helps disadvantaged communities nor reduces GHG emissions. In the SBCAG region and statewide, both disadvantaged populations and the cause of GHG reduction would be helped most by construction of new affordable housing within high-cost, jobs-rich areas, simultaneously reducing both (1) commute costs in time and money for people who could not otherwise afford to live in such areas and (2) vehicle miles traveled and emissions. Conversely (and perversely), emphasizing new affordable housing in currently impoverished areas far from jobs centers (1) exposes more people to pollutants already affecting these areas, (2) places new housing far from work opportunities, thereby increasing commute costs on those who can least afford them, and (3) increases average commute distance and therefore vehicle emissions.

- By contrast, providing affordable housing options in high-cost communities would give disadvantaged populations better access to jobs at less cost and reduce GHG emissions (by requiring less long-distance commuting).

3. Rely Primarily on State-controlled Measures:

To ensure the State's targets are achieved, the primary focus of the Scoping Plan should be on measures that the State directly controls, such as direct vehicle emissions controls and other similar mechanisms. By contrast, SB 375 achieves the implementation of SCSs largely through reliance on voluntary actions by local governments.

With respect to the transportation sector, the Concept Paper should be consistent with and specifically reference the Mobile Source Strategy and the newly completed California Transportation Plan (CTP) 2040, which, among other things, contemplates road user charge pricing mechanisms as a means to limit emissions and meet State climate goals.

4. SBCAG Prefers Concept 1:

The Concept Paper considers some major, potential changes and shifts in policy and approach to reducing GHG emissions. Such questions as whether to retain the Cap-and-Trade program or institute a carbon tax are fundamentally for the California legislature and electorate to decide. However, we would note generally that the Cap and Trade program, while directly reducing emissions from point sources, has also provided an important source of new funding for rail, transit and transit-oriented, infill development, which in turn result in even greater reductions. Also, Cap-and-Trade has been recognized by planning experts, academics and economists for many years as an effective, market-based approach to reducing GHG emissions. Abandoning Cap-and-Trade, as Concepts 2 and 3 would do, would cause uncertainty in the marketplace, potentially set a bad precedent beyond California, and may be premature. For those reasons, SBCAG staff prefers Concept 1, which stays the current policy course.

Thank you again for the opportunity to comment and please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Kemp".

Jim Kemp
Executive Director

cc: File (SP 30-09-09)
Richard Corey, Executive Officer, ARB
Bill Higgins, Executive Director, CALCOG