

April 10, 2017

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

Re: SBCTA/SBCOG Comments on the 2017 Climate Change Scoping Plan Update

The San Bernardino County Transportation Authority (SBCTA), together with the San Bernardino Council of Governments (SBCOG), formerly the San Bernardino Associated Governments (SANBAG), appreciates the opportunity to provide comments on the January, 2017 draft of the California Air Resources Board (ARB) 2030 Climate Change Scoping Plan Update. SBCTA and SBCOG are the County Transportation Commission and the Council of Governments, respectively, for San Bernardino County, serving 24 cities and the County of San Bernardino. We were the lead agency on the Regional Greenhouse Gas Inventory and Reduction Plan and accompanying Environmental Impact Report for San Bernardino County, prepared in 2014. A number of cities in the County prepared local Climate Action Plans (CAPs) based on this work, focusing on 2020 goals and tiering from the regional EIR for their environmental clearance.

We understand the structure, benefits, and challenges of GHG reduction planning at the local level and have numerous sustainability initiatives of our own, as will be explained later in our comment letter. Thus, our comments are provided in the spirit of our proven sustainability partnerships with state and regional agencies and our recent history of aggressively pursuing sustainability goals. Our comments focus on three primary topics:

- Recommended Local Plan-Level Greenhouse Gas Emissions
- Transportation Sustainability, and
- Funding

Recommended Local Plan-Level Greenhouse Gas Emissions

In the first paragraph under the above heading on Page 134 of the draft Scoping Plan, ARB makes the following statement:

“CARB recommends that local governments aim to achieve community-wide goal to achieve emissions of no more than six metric tons CO₂e per capita by 2030 and no more than two metric tons CO₂e per capita by 2050.”

This is further explained in the subsequent paragraph:

“This local government-recommended goal expands upon the reduction of 15 percent from ‘current’ (2005–2008) levels by 2020 previously recommended in the 2008 Scoping Plan. This is a statewide goal based on all emissions sectors in the State, and local jurisdictions may choose to derive region-specific evidenced based on per capita or per service population GHG emissions goals tied to these statewide goals. Once adopted, the plan and policies to achieve this goal can serve as a performance metric for subsequent projects.”

In our comments on the December 2016 ARB Scoping Plan Discussion Draft, we requested that ARB not establish a one-size-fits-all fixed goal but consider a percentage reduction approach, similar to what was recommended in the 2008 Scoping Plan. We explained why this would be important for inland areas like San Bernardino County. The need for this flexibility was also discussed at the ARB Scoping Plan workshop at the Southern California Association of Governments (SCAG) in Los Angeles earlier this year.

Although the draft Scoping Plan update states the opportunity for region-specific evidenced based goals, the fact that they are tied to the statewide goals still implies the expectation that we would be adhering to the statewide goal for subareas. As we explained in our earlier comments, we do not believe this is a workable or equitable approach, and the Scoping Plan should clarify this point. An achievable percentage reduction should be provided as an option.

To date, our Regional GHG Reduction Plan and the targets in our jurisdictions’ CAPs have been based on percentage reduction of GHGs from the baseline. Even SB 32 is based on a percentage reduction of GHGs from 1990 levels. A fixed goal of six metric tons of CO₂e per capita fails to take into consideration the baseline characteristics of the climate by geographic area and other characteristics of individual jurisdictions. Home energy consumption for equivalent dwelling units, for example, tends to be lower in coastal communities and higher in the inland areas and deserts. Although home construction in the inland areas tends to be newer and more energy efficient, on average, electricity consumption tends to be higher on a per-unit basis. The average monthly summer high temperature in San Bernardino is 96 degrees. The average for a coastal city is 71 degrees. The summer average high for a low desert community is in the range of 107 degrees.

It is imperative that the Scoping Plan explicitly recognize the geographic differences. This important aspect is not acknowledged in the current version of the Scoping Plan. The Plan makes note that the per capita emissions goals may not be appropriate in some jurisdictions, and that “mass emissions and service population emissions are also important to discuss.” However, the Plan is not adequately sensitive to geographic differences, particularly for a region as large as Southern California.

Residents of California have many reasons for living where they do, and one of the major factors is affordability. Median home prices in San Bernardino County are half of the median price in Los Angeles County and one third of the median price in Orange County. Many inland residents may prefer to live closer to the coast, with a more temperate climate, but cannot afford to do so. Further, San Bernardino County has one of the largest concentrations of disadvantaged

communities in the State. Imposing the same fixed goal on an inland city as for a coastal city would unfairly burden the inland communities, and it is likely that the 6 metric ton goal would be unattainable by 2030 for many inland locations. In the spirit of the “ambitious but achievable” language of AB 32, we urge the language of the Scoping Plan to be modified to express other specific options, such as percent reductions, not an implied absolute target.

Further, we believe that the choice of CAP targets should be made at the local level and not at the state level. A one-size-fits-all target would be inappropriate and counterproductive. We recognize that the CAP targets should be related to the 2030 reduction target in SB 32, but the approach should ultimately be left up to the responsible local agency. This has worked well for the original 2020 target, and the concept should be carried forward to 2030.

We also appreciate the mention of tiering as a CEQA tool, as this is a means to see achievement of GHG reduction goals more holistically, with greater flexibility at a project level. Having a project-by-project view, for either development projects or transportation projects, is an inefficient and restrictive means to accomplish either GHG reduction or VMT reduction goals. It will also further slow down much-needed housing production, which is critical to improving housing affordability, especially in the inland counties.

A tiered approach can also promote regional goals and policies more effectively. What ARB references on Page 134 as a “*performance metric for subsequent projects*” should really be referenced as a performance metric for regions or sub-regions, and we would request that the phrase be revised to read “*for subsequent projects or for regions and subregions.*” What matters is meeting our GHG reduction goals collectively, not that every individual project reach a certain performance metric, given that some projects will reduce GHGs more than others. Some may even increase GHGs but are essential for achieving other important objectives. The State cannot expect that every individual project will reduce GHGs, but that is what is implied by the statement, though perhaps not intended.

Transportation Sustainability

Part of the text in the second paragraph on Page 101 states:

“While most of the GHG reductions from the transportation sector in this Proposed Plan will come from technologies and low carbon fuels, a reduction in the growth of VMT is also needed. VMT reductions are necessary to achieve the 2030 target and must be part of any strategy evaluated in this plan. Stronger SB 375 GHG reduction targets will enable the State to make significant progress toward this goal, but alone will not provide all of the VMT growth reductions that will be needed. There is a gap between what SB 375 can provide and what is needed to meet the State’s 2030 and 2050 goals. More needs to be done to fully exploit synergies with emerging mobility solutions like ridesourcing and more effective infrastructure planning to anticipate and guide the necessary changes in travel behavior, especially among millennials.”

We agree with the general assessment that we should be working collectively to reduce VMT where practical. However, ARB should not under-estimate the challenges nor over-estimate the potential GHG reduction benefits of VMT-related strategies. SBCTA has been at the front lines

of VMT-reduction initiatives for a number of years, through the promotion and funding of ridesharing programs, transit service improvements, collaborative land use planning with local jurisdictions and regional agencies, and active transportation planning and implementation. San Bernardino County has the highest ridesharing rate of any Southern California county.

We are now investing in high-capacity transit systems at a level unprecedented for San Bernardino County, with over \$600 million being committed to capital improvements (i.e. excluding operations) for passenger rail and bus rapid transit systems over the 10-year period beginning in 2014. We have been actively pursuing with the South Coast Air Quality Management District the opportunity to implement zero emission light rail service for our nine-mile Redlands Passenger Rail Project, currently in design, and planned for operation in 2020. Even with these major investments and aggressive policies supporting transit oriented development (TOD), it is a stark reality that significant reductions in VMT (or at least slowing the growth in VMT) will come very slowly. Technology will provide a much faster and more cost-effective approach to GHG reduction, and we believe the emphasis should be placed there.

To illustrate this point, the California population grew by almost two thirds between 1980 and today. Over the same period, VMT has essentially doubled, with a slight dip during the Great Recession. At the same time, Corporate Average Fuel Economy for light duty vehicles has increased significantly, by about 45% since 1980. This illustrates the power of technology to temper the impact of population growth.

Much like the dramatic advancements that have been made in reduction of criteria pollutants, we believe technology is also the primary path to GHG reduction. Freedom of travel, a world-class goods movement network, and associated economic growth is what has enabled these technological investments to occur in cleaning up the air. The state should be cautious not to apply policies that restrict travel in a way that would set back the economy. This would limit the generation of capital needed to fund the building energy upgrades, efficiency measures, and penetration of zero and near-zero emission vehicles that will ultimately drive the reduction in GHGs. The more successful we are at reducing the vehicle-based GHG output, the less important VMT reduction becomes from a GHG perspective.

We also appreciate the acknowledgement throughout the Scoping Plan of the importance of freight. This relates to our comments immediately above. For example, a number of improvements need to be made to our freeway system to address current freight bottlenecks. Future state policy, related to SB 743 or otherwise, should not make it more difficult to deliver these projects, which are vitally needed to support our logistics-based economy and the flow of exports and imports from and to the nation. We anticipate that substantial progress will be made in freight-based technology, and this will drive GHG reduction to a much greater extent than VMT-related strategies. This is why SBCTA signed on to the petition for EPA to develop an ultra-low NOx standard for heavy duty trucks, together with other agencies from around the U.S., including SCAQMD.

Funding

We also appreciate the acknowledgement on page 30 that:

“California’s strategic vision for achieving at least a 40 percent reduction in GHG emissions by 2030 is based on the principle that economic prosperity and environmental sustainability can be achieved together.”

We believe this is possible, but the State needs to be alert to the possible unintended consequences of its actions. We have alluded above to the care that will be needed in how VMT reduction strategies are applied, particularly with respect to maintaining efficient freight flows within and through our region. About a third of San Bernardino County jobs are tied to the logistics economy. This is particularly important given the substantial presence of disadvantaged communities, for whom logistics industry employment is an important path to the middle class. To that point, we appreciate the notation on Page 75 that the:

“economic analysis will be revised prior to the final release of the 2030 Target Scoping Plan to include additional analyses including a regional impact analysis to estimate the distribution of economic impacts across regions of the State, including disadvantaged communities. In addition, there are currently three research contracts underway at CARB to quantify the impact of California’s climate policy on regions and disadvantaged communities throughout California.”

We would greatly appreciate any opportunity to provide input to the regional analysis, and it will be important to have an opportunity for review of the analysis prior to the approval of the Scoping Plan, given that this is fundamental to the concerns we have in San Bernardino County. That said, the costs of achieving the SB 32 GHG reduction goals will be extraordinary. Just the ARB Mobile Source Strategy and State Implementation Plan (SIP) Strategy show costs in the tens of billions of dollars by 2031.

In pursuing these goals, the businesses needed to fund the technological improvements should not be put in a position of having to choose between growing their business in California versus moving to or growing in places where costs will be lower, just so that they are able to stay competitive in the global economy. Leakage of business activity to other states would be an unfortunate result and would ultimately undermine global GHG reduction and our ability to generate the capital needed for the technologies to reach these goals, as stated earlier. Although California is the largest state in the Union, we cannot do this alone.

Again, we appreciate the opportunity to comment and look forward to further progress on sustainability statewide and in San Bernardino County in ways that are, as stated in AB 32, “technologically feasible and cost-effective.” We look forward to further discussions on this important document.

Sincerely,



Steve Smith
Director of Planning