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July 28th, 2017

Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: SB 375 Kern Regional Greenhouse Gas (GHG) Emission Reduction Target Update

Dear Chair Nichols, Air Resources Board members, and staff:

We thank you for the opportunity to provide comments on proposed Update to the SB 375 Greenhouse Gas (GHG) Emission Reduction Targets. We, the local undersigned organizations, are writing to ask the Air Resources Board (ARB) to ensure that the adopted Kern County SB 375 GHG Emission Reduction Targets are not only as ambitious as possible, but that Kern Council of Governments takes full accountability in respecting the new recommended targets by ARB, and that they work with community residents and local organizations to update and implement strong policies, strategies and programs to reach GHG Emission Reduction Targets.

We recognize that the Air Resources Board conducted a fair and independent review of all target-related materials. We applaud staff's decision to pursue higher targets than recommended by the Kern Council of Governments (KCOG).

While it is important to understand the uniqueness of Kern County, it experiences the same economic, air quality, climate and social equity challenges as the Central Valley as a whole. The city of Bakersfield, ranks as the most polluted city in the entire nation for short-term particle pollution, and the second worst for year-round particle pollution and ozone pollution.¹ Many disadvantaged communities are located in Kern County, which means that a significant number of residents are dealing with a host of environmental and socioeconomic issues. Kern County has prioritized developing and investing in large sprawling new neighborhoods and new towns on the outskirts of existing communities. Grapevine, for example, is a proposed, multi-million square foot master planned community that will include about 12,000 homes and commercial and industrial developments². Meanwhile, the unincorporated community of Lamont has prepared an affordable housing development that awaits funding. The SB 375 target-setting process offers an opportunity for the state to influence transportation and land-use planning to align with state climate goals.

Need for Additional Data and Stronger Analysis

We support ARB's approach in applying a 1-2% additional reduction to the MPO's currently adopted 2014 SCS performance, which puts Kern's 2020 and 2035 goals at 9% and 15% reductions, respectively. However, we would like to see more robust analysis demonstrating that these targets are as aggressive as possible. Our current state climate goals are incredibly ambitious and we will need to see more reductions from all sectors in order to reach this. California must see significant reductions from

¹ American Lung Association. State of the Air Report 2017. <http://www.lung.org/assets/documents/healthy-air/state-of-the-air/state-of-the-air-2017.pdf>

² Burger, James. 'Tejon to put new city-sized development before supervisors.' December 2016. <http://bakersfieldnow.com/news/local/supervisors-ok-massive-grapevine-project-on-tejon-ranch-property>

transportation since greenhouse gases from transportation account for the largest amount of our state's total emissions.³

In order to ensure we achieve the maximum GHG emission reductions, we urge the board and staff to take into account our recommendations when adopting the targets:

- Analyze KCOG current transportation spending and identify where KCOG and other local or regional agencies could shift their spending towards alternative transportation options that will help us achieve stronger targets.
- Incorporate land use changes that would protect natural and working lands and are proven to reduce GHG emissions into the targets.
- Incorporate social equity factors into the proposed targets and recommend analyses for KCOG to ensure targets maximize benefits and mitigate harms for low-income and disadvantaged communities.
- Provide greater transparency around the modeling so the public can better understand the *impact of what KCOG staff have called the rebound effect*.
- Identify the co-benefits, such as improved public health outcomes and better air quality, that we will see from stronger targets.

The Four Largest MPOs analyzed GHG reductions of various strategies and scenarios and submitted quantitative test results. We suggest that KCOG also conduct this analysis and submit results so that ARB may more thoroughly assess their targets. Local land-use planning decisions are not being made with considerations to climate and social equity, and we urge the Air Resources Board to conduct an assessment of the geographic distribution of all funded projects, including the population served by each project and the impact of the project on greenhouse gas emissions and VMTs. We believe that this analysis could help with identifying land use planning and policy opportunities that are not yet being utilized. This would also help with evaluating the ambition and feasibility of regional SB 375 targets.

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Thank you for the consideration of our comments, and we look forward to continuing to collaborate with you during this process. Any questions, feel free to contact us via e-mail at pleal@leadershipcounsel.org.

Sincerely,

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³ California Greenhouse Gas Emission Inventory Program. www.arb.ca.gov/cc/inventory/data/data.htm

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