



July 28, 2017

California Air Resources Board
1001 I Street
Sacramento, CA

submitted electronically via: <http://www.arb.ca.gov/lispub/comm/bclist.php>

RE: San Diego Region Support for ARB's Proposed SB 375 Targets & Recommendations for Ensuring Success

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

Thank you for the opportunity to provide comments on the proposed Update to the SB 375 Greenhouse Gas (GHG) Emission Reduction Targets. We, the undersigned organizations, strongly urge the Air Resources Board (ARB) to ensure that the adopted SB 375 GHG Emission Reduction Target for the San Diego Association of Governments (SANDAG) be set at a feasibly aggressive level that aligns with our region's vehicle contribution to GHG emissions.

Transportation is the single largest emitter of greenhouse gas (GHG) emissions in California, comprising 39% of total emissions, with passenger and light duty vehicles at 26%.¹ In the San Diego region, transportation generates a disproportionately high share of emissions. Transportation alone accounts for 49.5% of GHG emissions, while cars and light duty vehicles contribute 37.2% of emissions.² The cycle of more cars - more lanes - more cars must stop now. Many local jurisdictions are adopting or considering 100% clean energy targets, but without a strong regional, vehicle-based GHG emission reduction target, our region will fail to conform with state-required GHG reductions. This round of target updates provides our region the opportunity to take meaningful steps to mitigate emissions, to enhance our quality of life, and to protect and increase affordable housing in the region.

SANDAG's updated GHG emission reduction targets should be raised above the 18% target that SANDAG has recommended. Specifically, the 2035 target should be at least as high as 25% but no less than 21%. SANDAG's 2015 RTP/SCS proposed a 21% vehicle-based GHG emission reduction target (by 2035) from the base year. And, SANDAG certified the EIR for that

¹ <https://www.arb.ca.gov/cc/inventory/data/data.htm>

² [San Diego Regional Plan, Appendix D.](#)

RTP, which means that it established sufficient evidence to support that target (and the necessary implementing and monitoring mechanisms). *There should be no retreat from that target.* CARB has stated that the updated targets should not be out of reach for the MPOs; the certification of the EIR for the current RTP clearly indicates that a 21% target is achievable.

SANDAG's Stress Test Scenarios Did Not Analyze Potentially Transformative Strategies to Reduce GHG Emissions

In describing the Greenhouse Gas Reduction Target Setting Process, SANDAG asserts, "The stress tests indicate that only limited additional GHG reductions are achieved from aggressive land use changes and transit investment assumptions."³ However, the stress tests fail to incorporate feasible, cost-effective, and forward-thinking solutions that would enhance equity and improve mobility in the region. For example, if we were to design and implement systems to improve how we pay for the use of roads and car parking, significant driving reductions would result. Considering only the revenue-constrained regional plan and a series of scenarios that are out of the region's hands (including VMT User Fee, which is not yet allowed), while neglecting to consider feasible alternatives, makes it a foregone conclusion that the revenue-constrained option will appear to be the only reasonable choice. In other words, the assumptions that generated the 18% target appear to be cherry-picked to point to the revenue-constrained option and make other alternatives seem unreasonable. Our recommendations to reach more ambitious targets are addressed below.

1. The San Diego Region Needs a 21st-Century Transit System

The Stress Test scenarios that evaluate the impact of advancing transit at a more aggressive rate explore the effect of accelerated completion of projects and more frequent service; however, no scenario (including SANDAG's own plan to meet the goals of SB 375) considers the effect that a state-of-the-art infrastructure system would have on emissions.

In fact, SANDAG did develop an urban area transit strategy (UATS) for the region, calling it "the foundation of the 2050 RTP/SCS transit planning process."⁴ According to SANDAG:

"[T]he goals of the transit strategy are twofold: first, maximize transit ridership in the greater urbanized area of the region; and second, test the role of the transit network to reduce vehicle miles traveled and greenhouse gas emissions. The second goal will help SANDAG comply with Senate Bill 375, which mandates that Metropolitan Planning Organizations develop a Sustainable Communities Strategy to align their transportation, housing, and regional land-use plans with the goal of reducing greenhouse gas emissions."

SANDAG's plans for roadway and freeway expansion undermine its own stated goals of increasing transit ridership and reducing greenhouse gas emissions. So, the stress test ignores both the 21% reduction goals in the 2050 RTP and the documented land use and transit goals of the UATS.

³ https://www.arb.ca.gov/cc/sb375/staff_report_sb375_target_update_june_full_report.pdf page B-45.

⁴ <http://www.sandag.org/index.asp?projectid=368&fuseaction=projects.detail>

A report⁵ prepared in 2015 by Norm Marshall of Smart Mobility quantifies how SANDAG's predicted new land-use patterns can best be served by transit-first mobility while also accommodating the expected 31% increase in population without *any* increase in regional VMT. Utilizing data from SANDAG's own UATS, the Marshall report demonstrates that to reach the UATS transit mobility goals the number of transit trips should increase by over 200% by 2050 and the number of walk trips should increase by over 100%.

SANDAG's regional transportation system proposals and project list will not produce an infrastructure system that is efficient, affordable, and accessible enough to significantly improve quality of life and reduce emissions in the region. More effective alternatives, in terms of service area coverage, route time reductions, and passenger acceptability, have been proposed for the region. One such alternative - the Quickway Proposal - would build off and integrate the existing system, and would be cost-competitive with existing plans. The Quickway Proposal, however, has not been given appropriate consideration and evaluation by SANDAG, even though it would, if implemented, reduce emissions more than the currently envisioned transit system. Similarly, the Cleveland National Forest Foundation's 50-10 proposal would ensure the prioritization of transit over freeways.⁶ We recommend that SANDAG partner with stakeholders and academic institutions to identify and evaluate alternative transit systems, such as the Quickway Proposal and the 50-10 proposal, that could truly move the needle on transit ridership while remaining cost-effective.

SANDAG's TransNet project list has remained essentially the same for over a decade. It reflects outdated transportation practices and priorities; it does not reflect significant changes and advanced technologies in the transportation sector that will reduce passenger vehicle use and emissions. Furthermore, SANDAG's current RTP/SCS does not provide sufficient incentive for increasing housing densities and making commercial/retail businesses transit-ready, which then forces more people to need and use more vehicles. Hence, the current SANDAG RTP/SCS calls for additional freeway lanes, which will induce even more vehicle use (as has been documented in studies by UC Davis and acknowledged by Caltrans reports).

Finally, SANDAG could further reduce GHG emissions by supporting policies, including tax policies and the use of Greenhouse Gas Reduction Fund (GGRF) grants, that empower business owners, especially small business owners, to make investments in transportation infrastructure to ensure that freight moves by lower-emission local, short-line freight railroads, instead of adding to highway congestion and pollution. Grant-matching or other mechanisms could spur small businesses to take advantage of state programs and reduce VMT beyond the level envisioned in the Regional Transportation Plan (RTP).

2. An Analysis of Potential GHG Reductions Must Include Social Equity, Including Affordable Housing and Public Health

⁵<https://www.dropbox.com/s/dmetfri3ve9a5i6/N%20Marshall%20Quantifying%2050-10%20final%204-15-15.pdf?dl=0>

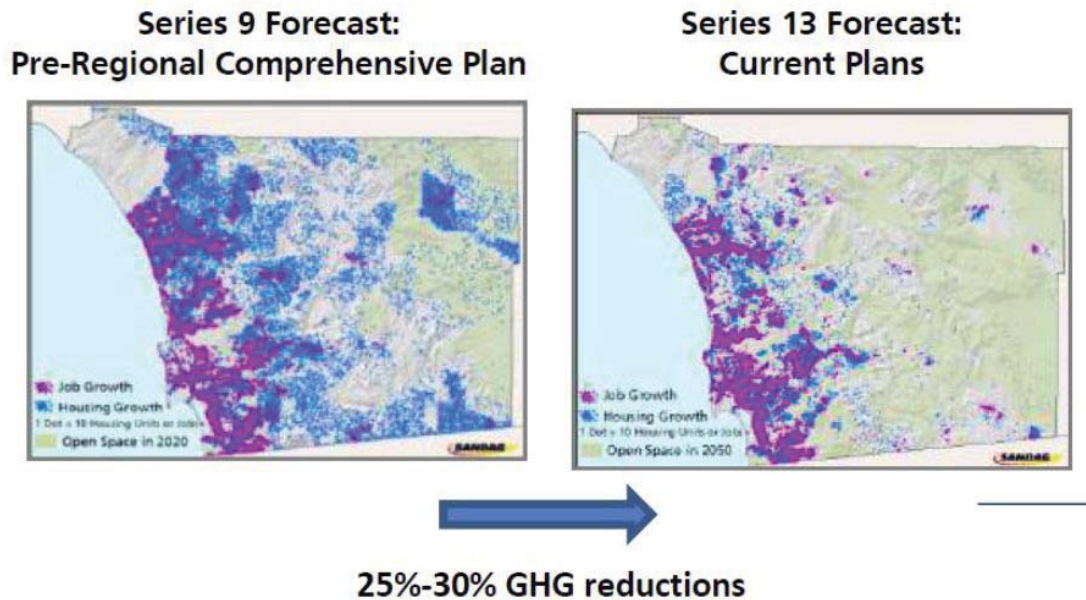
⁶ http://www.transitsandiego.org/50_10_transit_plan

Unfortunately, social equity concerns are not addressed in SANDAG's rationale for the proposed 18% target. We firmly believe that equity should be at the forefront of long-term planning that links housing, land use, and transportation. SANDAG should evaluate how increasing the stock of affordable housing can lower GHG emissions by decreasing commute distances. Dense affordable housing located in the region's urban core areas paired with an improved transit system, as described above, will work synergistically to reduce GHG emissions more than pursuing either strategy in isolation.

According to the CalEnviroScreen, disadvantaged communities like Barrio Logan and West National City rank in the top 10% of the most impacted census tracts for pollution, in large part because of their proximity to freeways. As discussed earlier, freeway expansion results in more GHG and toxic air contaminant emissions. Further, the communities adjacent to freeways endure the worst of these impacts with their families' health and wellbeing. These communities already suffer from 3 times the asthma rate than the San Diego County average and residents have pleaded for a more robust and effective transit system for years. SANDAG has instead advanced a car-centric, expensive, and freeway-focused system. We recommend that CARB require a transit-first approach for impacted communities as identified by CalEnviroScreen .

SANDAG's Series 13 growth forecast graphically describes the GHG reductions purportedly achieved by more compact future growth. Yet this growth forecast is contradicted by the fact that SANDAG also forecasts VMT per capita to be more or less constant in the future. Clearly the evidence shows that SANDAG's land use assumptions and VMT assumptions are irreconcilable. On the other hand, building the transit, bike and walk infrastructure to serve the forecasted compact land use will allow SANDAG to achieve the higher GHG reduction rates, and reconcile SANDAG's apparent contradiction between land use and transportation infrastructure.

Figure 7: Large reductions in future GHG relative to past plans from more compact growth



Source: SANDAG, “San Diego Forward: The Regional Plan: Alternative Land Use Scenarios”⁷

3. Require use of CalEnviroScreen 3.0 for identification of impacted and disadvantaged communities and for prioritization of transit and active transportation investments

In creating their analysis, SANDAG used their own census tract analytical tool, the Healthy Community Atlas, in order to delineate and define disadvantaged communities throughout San Diego. In this analysis, SANDAG only considered three groups in their definition of a “disadvantaged community” – seniors over 75, households with income up to 200% of federal poverty level, and minorities. In the case of seniors, SANDAGs tool failed to account for the vast diversity in income levels and ability to travel, skewing the analysis dramatically. In doing so, La Jolla and Del Mar, two of the wealthiest communities in San Diego County, are listed as “communities of concern.” These results are not only imprecise but also unfair to the truly disadvantaged communities in San Diego. CalEnviroScreen takes into account the intersecting effects of the various environmental, health, and socioeconomic indicators in all California’s communities. In San Diego, we see how the CalEnviroScreen precisely pinpoints the true communities of concern. We recommend that CARB use CalEnviroScreen 3.0 to rank census tracts and inform your GHG emissions reduction targets based on an intersectional analysis of community vulnerability.

4. The Region Should Pursue More Aggressive Implementation of Technological and Innovative Mobility Solutions

⁷<https://www.dropbox.com/s/dmetfri3ve9a5i6/N%20Marshall%20Quantifying%202050-10%20final%204-15-15.pdf?dl=0>

SANDAG's past assessments of new technologies have been conservative, but it can and should integrate more of the modern technologies that will reduce vehicle GHG emissions. In addition, the RTP/SCS does not factor in the rapid evolution and implementation of self-driving vehicles, car-sharing, and similar innovations that will reduce vehicle use. These developments should be modeled in projections of GHG reductions.

5. Pricing Strategies Can Incentivize Widespread Use of Public Transit and Reduce VMT

- Developing pricing policies (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts, congestion pricing).
- Support shared, convenient, and value-priced parking, operated in conjunction with a system that provides earnings to those paying higher costs or getting a reduced wage, due to the cost of providing the parking.

6. Require assessment of displacement potential as a result of land use and transportation plans.

Studies throughout the United States and in California have documented the relationship between transit-first development and displacement. Often, transportation systems are developed in a manner that exclude the communities and families that need them the most with unreasonable pricing and no control over housing prices near transit routes. We recommend that CARB require SANDAG to integrate anti-displacement measures in all planning processes.

Conclusion

We have provided ample evidence to support the revision of SANDAG's proposed GHG emission reduction target from the current 18% to 21-25%, a target that is both feasible and necessary.

We thank you for your leadership and assure you that we, the undersigned organizations and advocates, will continue working for policies that put transit before freeways, promote public health and affordability, and reduce GHGs while enhancing quality of life in our region.

Sincerely,

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