



Rajinder Sahota
Deputy Executive Officer, Climate Change and Research
California Air Resources Board
Byron Sher Auditorium
1001 I Street
Sacramento, CA 95814

June 23, 2022

Subject: Comments on the Draft 2022 Climate Change Scoping Plan

Dear Ms. Sahota:

Tejon Ranch Company, on behalf of itself and its subsidiary/affiliated entities Tejon Ranchcorp and Centennial Founders, LLC (collectively, the "Tejon Ranch"), appreciates the opportunity to comment on the Draft 2022 Climate Change Scoping Plan (the "Plan") released on May 10, 2022.

Tejon Ranch is the owner of the largest single expanse of private property in California and has a demonstrated 175-year legacy of sustainable land stewardship in Kern and Los Angeles counties. In 2008, Tejon Ranch voluntarily entered into binding agreements that conserve 240,000 acres (90 percent) of Tejon Ranch and allow for sustainable development of 10 percent of Tejon Ranch alongside state transportation corridors and established job centers. Tejon Ranch's historic commitment land conservation exceeds that of any other private landowner in the state of California.

Founded from four 1843 Mexican land grants, the conserved lands of Tejon Ranch remain – and will continue to remain – in a natural state as a product of our stewardship. Much of what is experienced today on Tejon Ranch is what would have been experienced hundreds of years ago. This is due to the fact that Tejon Ranch has managed the land to protect its natural resources. Our agricultural and ranching operations utilize the latest and best management practices available and are a significant sequester of carbon. Our real estate development activities use the most suitable lands to meet the housing, employment, open space and lifestyle needs of current and future generations of Californians. Conservation and good stewardship tenets are woven across Tejon Ranch and are an integral part of our business operations.

Specific to CARB's Draft Scoping Plan, we offer the following comments and recommendations:

- 1. Natural and Working Lands.** CARB proposes to rule out development on 90 percent of California's land by labelling it as "natural and working lands." The Plan seeks to avoid conversion of all existing forests, shrublands and grasslands, as well as a 50 percent reduction from current development conversion levels in "deserts and sparsely vegetated landscapes." Such a sweeping designation as natural and working lands suggests a dismissal of local jurisdictions' land use prerogatives, imposed at a time when local jurisdictions should be exercising their approval powers more urgently to address the present housing shortage and home affordability crisis. CARB proposes policy changes under the California Environmental Quality Act ("CEQA") that

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require deciding agencies (e.g., local governments) to study impacts and impose mitigation requirements when approving projects and land use plans. CARB's CEQA proposals strongly disfavor all but relatively high-density (e.g., at least 20 units/acre), central urban, mass transit-oriented development and re-development. The effect is to disfavor, prejudice, and overly burden all other types of development, including lower density communities, redevelopment projects, and suburban development, and hinders the development of sustainable master planned communities designed to help meet the rising housing production needs of Californians. Candidly, CARB's promotion of infill-only is misguided, unpractical and non-workable.

2. Inconsistency with Previously Approved Plans and Projects and the Transfer of Land Use Control from Cities and Counties to Regional Transportation Agencies. The Plan codifies regional plans into "land use plans and regulations at the local level" and therefore threatens to hinder sustainable growth and much needed housing production in Southern California and beyond. State law intentionally grants land use authorities with local governments. CARB should respect the alignment of land use, housing, transportation, and conservation planning in adopted regional plans, such as regional transportation plans (RTP) or sustainable communities strategies (SCS) and regional housing needs assessments (RHNA) and local plans (e.g., general plans, zoning, and local transportation plans). The Los Angeles County General Plan 2035 (General Plan") was adopted with principles that emphasizes sustainability. The Antelope Valley Area Plan ("AV Plan"), adopted as a community-based plan for the Antelope Valley area and a component of the General Plan, relies on a Rural Preservation Strategy to meet the goals and objectives of the General Plan, by balancing priorities for environmental conservation and preservation against the need for development. As part of the AV Plan's Rural Preservation Strategy, three Economic Opportunity Areas ("EOAs") were adopted. These EOAs, areas where major infrastructure projects are being planned by state and regional agencies, reflect the County's priority areas for growth and development within the Antelope Valley. Tejon Ranch is committed to a legacy of stewardship of our land, land conservation, and the thoughtful development of large-scale mixed use sustainable communities meet the rising housing, employment and lifestyle needs of Californians.
3. Exacerbates California's housing shortage and affordability crisis. The Plan prioritizes affordable housing and social equity goals, however, it fails to acknowledge the additional cost burden on housing development by increasing GHG and VMT mitigation measure costs and thus housing costs. In the midst of skyrocketing home prices and inflation that has reached a 40-year high, we urge CARB to actually pursue statewide policies that will help ease California's housing crisis and work to lower barriers to entry on home ownership at all levels of affordability. CARB continues to champion land use policies aimed at radically reducing per capita vehicle miles traveled ("VMT") specifically, CARB aims to decrease individual mobility by nearly one-third, by mandating sweeping and concentrated changes in our urban form, effectively ruling out all other kinds of development and redevelopment. Since 2010 (pursuant to Senate Bill 375 enacted in 2008), CARB has been promoting land use scenarios aimed at reducing per capita VMT; but no meaningful VMT reductions have been realized. An unwavering reliance on VMT cutting means that CARB is driving California's citizens out of state. Jobs are transitioning and are becoming automated or offering work from home. The Plan also states that State funding should be "eliminated" for "infrastructure, development, that falls outside of infill areas that do not demonstrate clear

alignment with State guidelines on VMT, climate, and equity outcomes." This approach punishes Californians, as the plan does not take into account existing laws and policies currently advancing mobility efficiency and capacity. Prior to VMT action, CARB should assess the lifestyle changes and infrastructure investments required before it enacts VMT mandate. Without the infrastructure investment, lives of hardworking Californians will be harmed.

4. Net-Zero GHG Communities. In Appendix D, the Plan specifically recognizes Tejon Ranch's Centennial Master Plan as a net zero GHG project but does not address other relevant prohibitory Plan provisions (e.g., grassland and "sparsely vegetated" land use restrictions) or VMT. To generate delivery of net zero GHG projects, the Plan should unambiguously include a grandfathering provision for Centennial and other previously approved projects that comply with existing general plan housing elements and/or have vested development rights but still require additional agency approvals for complete buildout. Without recognition of already approved net zero GHG projects, the Plan jeopardizes delivery of the very types of projects it seeks to promote in the Plan.

Over the last two decades, Tejon Ranch has undertaken the planning, entitlement, and permitting efforts of four master-planned communities on the 10 percent developable lands of Tejon Ranch. Tejon Ranch's commercial development and residential housing projects are long-considered, sustainable communities. Tejon Ranch's projects are appropriately balanced and will contribute to resolving California's severe housing crisis by building more than 35,000 homes, including affordable housing units that help achieve Governor Gavin Newsom's housing vision of a *California for All*.

We appreciate being able to participate in the Scoping Plan process and having our comments taken into consideration.

Thank you,


Marc W. Hardy (Jun 23, 2022 16:37 PDT)

Marc W. Hardy
Senior Vice President, General Counsel