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Imperial Beach, CA 91932

March 15, 2018

Chair Mary Nichols and Members of the Air Resources Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets

Dear Chair Mary Nichols and Members of the Air Resources Board:

The Southwest Wetlands Interpretive Association (SWIA) is an environmental organization established over 40 years ago whose mission is to conserve wetlands and other sensitive natural habitats, primarily in San Diego County and southern California. Our organization is extremely concerned about how the Air Resources Board's SB 375 update and new greenhouse gas (GHG) emission reduction targets will assist and direct local jurisdictions to reduce GHG emissions. Coastal wetlands are particularly vulnerable climate change and associated sea level rise. We are submitting these comments to support the majority of the proposed improvements, but also to recommend clarifications and present the rationale for increasing the GHG target for the SANDAG region. We also support the recommendations in the Climate Plan letter and other environmental groups' letters to CARB on this issue. Our specific comments follow:

Page 2. We support the CARB staff report's essential recommendations: Staff proposes to increase the GHG emission reduction targets and shift the focus of the program more squarely onto the SCSs. The goal of this new approach is to ensure that the MPOs continue to innovate, while emphasizing implementation and accountability. In addition to increasing the GHG emissions reduction targets themselves, the following new program changes are being proposed: 1) transitioning the current program targets to recognize and isolate the incremental changes the regions are making to their land use and transportation policies and investments from plan-to-plan; and 2) incorporating additional reporting and data tracking related to their investments, transportation project lists, and SCS implementation over time.

In addition, we strongly recommend further changes to clarify and strengthen SB 375.

Pages 6-7. We agree with the proposed objectives. As implied in these objectives, it is essential that GHG emission reductions from vehicle fuel efficiencies, alternative (low carbon) fuels, methodological (assumption and computation) changes should be separately accounted and not attributed to the RTP/SCS plans. The new emphasis to place greater responsibility for GHG reductions onto the SCSs, and to have them be accountable to clearly demonstrate (account for, monitor and report) how their measures are producing the necessary GHG emission reductions and anticipated co-benefits.

Pages 14-16 (Top-down Analysis). Meeting SB 375 goals must involve some “top-down” elements that provide for general SCS consistency while allowing for each SCS to reflect regional differences and opportunities. We concur that the state (i.e., CARB) must establish the overall approaches and contributions from the state versus the individual SCSs.

As described in the report, the passenger vehicle GHG reductions are expected to derive from substantial increases in zero emission vehicles (50% ZEVs in new car sales by 2035), renewable energy sources for vehicles (50% by 2035), and reduced VMT (7.5% from 2035 baseline). However, the staff report does not appear to address a significant concern that while increasing ZEVs and renewable fuels will reduce vehicle GHG emissions, those actions could have a perverse effect of reducing the commitments by the SCSs to use land use changes and alternative transportation to reduce GHG emissions – the two primary mechanisms by which SB 375 intended the MPOs to achieve their targets.

Regarding VMT, it is unclear whether the MPOs will consider VMT reduction as a critical tool and contribute their “fair share” to reduce statewide VMT. For example, recent approval of the County San Diego Climate Action Plan (CAP) dismissed the significance of VMT and allows unconstrained use of offsite carbon credits to “mitigate” for project GHG emissions – much of which are vehicle-derived. The RTP/SCSs should not be allowed to offset/mitigate for increased mobile source emissions by purchasing carbon credits. If this practice to compensate for a failure of the SCSs to reduce VMT is adopted across the state, then anticipated in-state GHG reductions would likely not be achieved; instead, the “reductions” would rely on out-of-state carbon credit programs, effectively avoiding a portion of California’s committed GHG reductions by shifting that fraction (burden) onto out-of-state areas. A substantial reliance on offsite (outside of the MPO) carbon credits should not be promoted or allowed to satisfy the individual MPOs GHG reduction targets.

Pages 17-21. (Bottom-up Analysis). The feedback from the MPOs that is summarized in this section raises significant concerns. As many participants in each MPO effort have discovered, the MPOs generally adopt a very conservative (i.e., reluctant) approach to evaluating the potential effectiveness of measures that aren’t already part of their RTPs. Also, they routinely discount the legitimate – and necessary – influence that the RTP/SCSs should have on local jurisdictions. Although SCSs are not land use plans *per se*, they can and must provide the rationale/incentives for integrating regional land use/development across jurisdictions. This should include analyzing and producing a regional “blueprint” for the most effective allocation of land uses and transportation system improvements, even if achieving those outcomes would necessitate changes to local general plans, re-allocating transportation and housing funding, etc. Any RTP/SCS that does not provide that basic level of guidance is bound to fail to achieve its real potential.

Regarding the potential GHG reduction for each RTP/SCS, we disagree with the position of the “Big Four” MPOs that an 18% reduction by 2035 is all that is possible. As identified in the CARB 2017 Scoping Report, achieving the state’s 2035 GHG target reduction will fall short with the MPOs combined reductions at 18%. A gap in needed GHG reductions by 2035 will make achieving the 2050 target even less likely. We believe the MPO targets should be increased (see comments for pages 26-37).

Pages 22-25. We sincerely appreciate the willingness of CARB to provide for extensive public input into the SB 375 update process. SB 375 guidance should provide the framework and incentives - be the catalyst - for all MPOs to finally integrate the larger GHG reduction goals with the most fundamental element of the transportation sector: a functional, efficient, affordable and adaptable transit system. The "top-down (higher level)" and "bottom-up (on-the-ground)" approaches are the bookends of the GHG reduction solution and an effective SB 375 program, and the individual RTP/SCSs must produce plans that finally integrate those approaches.

Pages 26-37. The staff recommendation reflects an attempt to balance top-down and bottom-up contributions to achieve the state’s GHG emission reduction targets. It is crucial that the contributions from each (“top” and “bottom”) be identifiable, monitored/tracked and met – or that adaptations are instituted to ensure the commitments are achieved. This is particularly important for the SCSs, as the present approach makes it difficult to fully understand whether and/or how much each GHG reduction measure is contributing to the MPOs target reduction.

As noted on Page 27, the new approach is expected to require MPOs to begin isolating and quantifying their regions’ emissions reductions attributable to SCS transportation and land use strategies. While each MPO will have unique opportunities and constraints to achieve its targets, the SANDAG region benefits from having a well-defined Urban Area Transit System zone (including smart growth areas), large areas of public open space lands, and low-density zoning for much of the remaining undeveloped lands. While there is no the official “greenprint” for the entire County, the existing urban zone/smart growth areas, dedicated conservation open space and other non-developable public lands provide a rationale and guidance for having the RTP/SCS focus future growth and transportation service improvements within the County’s urban zones. This will have the effect to reduce VMT and vehicle-derived GHG emissions. Given these conditions, we expect that the next iteration of the SANDAG RTP/SCS can achieve greater GHG reductions than the staff report recommends.

The current SANDAG RTP/SCS identifies that it could achieve a 21% reduction by 2035 (Table 4.8-11 in the Final EIR; source:

http://www.sdforward.com/pdfs/EIR_final/Section%204.8%20Greenhouse%20Gas%20Emissions.pdf), but SANDAG has now claimed that it can only achieve an 18% reduction by 2035. We disagree with SANDAG’s assertion that it can only achieve 18% reduction and with the CARB staff’s recommendation of a 19% reduction by 2035. As described above, San Diego County is particularly predisposed to focusing future development within existing urban footprint (“smart growth,” TOD and other existing urban footprint areas) and the currently approved general plans can accommodate all future housing needs. SANDAG and the local jurisdictions have sufficient areas of density and a basic transportation system network that can be adapted to further reduce vehicle use and increase transit, active transit,

car-sharing, etc. For these reasons, we strongly recommend that the SANDAG 2035 GHG reduction target for 2035 be returned to at least 21%, which is the per capita percent reduction that SANDAG has in its current RTP/SCS. A higher target, up to 25%, should also be considered as we believe it is feasible.

Page 30. We fully agree that reporting and tracking by the MPOs must be improved and reflect the emphasis on the new approach requiring MPOs to begin isolating and quantifying their regions' emissions reductions attributable to SCS transportation and land use strategies. It is crucial that the tracking and reporting clearly identify both "compliance" and "effectiveness" of the plans. Compliance (implementation) monitoring must track the status of plan implementation, ensuring that planned actions comply with the specified/described action, are executed according to the proposed time schedule, and are appropriately funded. Effectiveness monitoring must track the measurement of the results from the implemented actions in terms of whether/how well they are meeting the Plan's specified outcomes. Metrics such as shifts in land use and mode share (toward the required status) and VMT reductions are essential, but vehicle-based GHG reductions, total commute time/costs and specified social equity metrics are the ultimate indicators of whether the RTP/SCSs are actually working.

Page 31. The proposed GHG reduction target for SANDAG by 2020 (15%) is consistent with what SANDAG documented as achievable in its current RTP/SCS, and appears sufficient to put the region on a trajectory to achieve the higher target (21-25%) that we recommended above.

Page 34. As we stated in comments above, we strongly recommend that the SANDAG GHG reduction target for 2035 be at least 21%, which aligns with the current SANDAG RTP/SCSs identified, achievable reduction.

SWIA appreciates the effort that CARB has put into updating the SB 375 guidance and GHG reduction targets. While the revised approach and recommendations to place greater responsibility and transparency on the RTP/SCSs are an improvement, we respectfully suggest that it must include recommendations in this letter – and those of other environmental groups – to provide the necessary guidance and targets that will put the state on track to meet its GHG reduction goals. Bill Tippetts (billtippetts@gmail.com) is our contact if your staff wishes to discuss our comments in more detail.

Sincerely,



Michael A. McCoy, President



Bill Tippetts, Board Member

Cc: SANDAG