

March 21, 2018

Re: Proposed Updates to Senate Bill 375 Greenhouse Gas Emission Reduction Targets

Dear California Air Resources Board:

This letter is to provide our support for the proposed updates to Senate Bill 375 greenhouse gas (GHG) emission reduction targets. The City of San Diego has adopted one of the most ambitious Climate Action Plan's (CAP) in the California and the country. In addition to supporting California Air Resources Board's (CARB) statewide targets for greenhouse gas reduction, our Plan includes goals to shift 50% of commute trips to bicycling, walking, or transit rather than driving alone. We are striving to do our part to reduce GHG emissions.

The City of San Diego has made substantial policy and process changes in the two years since we adopted our CAP. We have revised the process for environmental review of projects, rolled out increased infill and density initiatives that support more affordable housing and lower vehicle miles traveled (VMT), approved more housing units close to transit, and we have publicly and transparently reported our GHG emissions inventory and performance metrics annually. We know first-hand that these policy shifts are not easy and they need continual revision based on new information in an evolving field.

For these reasons, we support the targets proposed by CARB staff. However, we also encourage the Board to revisit these targets more frequently. The transportation sector is changing rapidly and our collective knowledge of GHG modeling and policy experience is growing rapidly, thus the targets should be revisited more regularly than every eight years as mandated by SB375. We recognize CARB staff's determination that there are other actions aside from targets for Sustainable Community Strategies that will lead to necessary GHG emissions reductions and support increases in those program targets as well.

We also support increased focus on performance metrics, including regular monitoring and reporting. GHG models are nuanced, complex, and based on forecasts and inputs that can vary by region and model. They are a valuable measure, if imprecise, in determining improvements that impact people in a region. Placing greater value and emphasis on performance measures that can be seen and measured in addition to GHG emissions modeling and inventories is a lesson those involved in GHG monitoring are learning is equally as important. We are hearing from our community a desire for more mobility choices beyond driving alone and support for cleaner transportation. We hear a need for more options to get to jobs and schools that are cost effective and have reasonable transit times. Performance metrics that track actual increases in programs such as active transportation options, land use changes, social equity measures, and transit are tangible and measurable outcomes. We support CARB's increased focus on performance metrics and SANDAG and other MPOs being directed to provide regular reporting on performance metrics in addition to GHG emissions.

Additionally, the City requests that CARB monitor funding distribution in support of GHG emission reduction measures by region. These ambitious targets set by sector, Metropolitan Planning

Organization, or cities cannot be met without financial resources and investments. The funding being collected and/or distributed at the State level should strive to distribute funds proportionally throughout the state. If there is an imbalance, CARB would have the vantage point and expertise to determine solutions.

The City of San Diego makes up nearly half of the region in terms of population and many related activities. We are committed to reducing our GHG emissions and improving transportation in our City. We look forward to continuing to work with SANDAG in support of achieving these same goals for our region.

Sincerely,



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