



SAN JOAQUIN COUNCIL OF GOVERNMENTS

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July 8, 2016

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SAN JOAQUIN

Re: Comments on ARB's 2030 Target Scoping Plan Concept Paper

Dear Ms. Nichols:

Thank-you for the opportunity to review and provide comment on the California Air Resources Board's (ARB) 2030 Target Scoping Plan Concept Paper. The Concept Paper has far reaching implications for regional agencies such as the San Joaquin Council of Governments (SJCOG). Following are SJCOG's concerns and comments that we ask be considered as ARB moves toward development of the updated 2030 Draft Scoping Plan.

The Concept Paper identifies SB 375 and its linkage of transportation, land-use and climate policy as just one of many ways to address land use issues and provide climate benefits. However, in each of the proposed conceptual scenarios, SB 375 GhG reduction targets are incrementally increased to ever higher unspecified levels ("increased stringency" or "ambitious stringency") over current "ambitious and achievable" targets. There are several flaws inherent in this strategy:

- While SB 375 calls for GhG reduction targets to be revisited at regular intervals, it does not necessarily indicate that they should be increased. Conceptually, programs that would incentivize and accelerate implementation of the goals and strategies within the RTP/SCS would go further toward decreasing overall climate impacts than a continuing numerical increase in the targets themselves. The language in SB 375 is "ambitious and achievable." The emphasis should be on implementation to achieve the already ambitious modeled reductions.
- Regional agencies such as SJCOG have no direct land-use control. SB375 relies heavily on implementation of the SCS through local agencies that do exercise land use control. Additionally, changes in land use patterns, due to existing built environments, inventory of previously approved projects, and long lead times for projects to come to fruition, are slow to occur. Currently planned projects and new land use policies will not substantially affect travel patterns for many years to come. Again, incentives to local governments and recognition of the importance of public/private partnerships in achieving GhG reduction goals should be recognized and encouraged through additional incentives to local agencies.

- The Concept Paper, while indicating that the trade-offs between competing, and perhaps, counter-balancing goals, will be explored, does not explicitly recognize these trade-offs in the conceptual scenarios. If, as intimated in the Concept Paper, goals of resilient economic growth, increasing sequestration in the natural environment, improving public health, and increasing investment in disadvantaged communities are to be co-equal to GhG reductions, the potential trade-offs and the effect on SB 375 targets must be explored.
- Finally, as recognized in the Concept Paper, the state of modeling and economic analysis tools continues to evolve at the state level. It appears that ARB is considering various elements in each of the scenarios for which adequate modeling and measurement tools are only now being developed or finalized. This is also true on the regional level, where the effect of newly mandated and/or newly implemented modeling tools on absolute GhG reduction numbers is still being tested. Setting vague “stringency” increases in SB 375 targets in the conceptual scenarios at this time is ill-timed and premature.

SJCOG is committed to the intent of SB 375, and has, in the two short years since adoption of its first RTP/SCS, SJCOG invested in local projects and initiatives to demonstrate progress toward implementation of the goals and strategies contained in its 2014 plan. However, for the reasons outlined above, more reliance on elements directly controlled by the state, such vehicle emission controls, fuels standards and like strategies, will be a preferable, and ultimately more effective, approach to the Draft Scoping Plan, than arbitrary and vague increases in the SB 375 reduction targets.

SJCOG appreciates the opportunity to comment and looks forward to continued collaboration with ARB staff on this important document.

Sincerely,

A handwritten signature in blue ink that reads "Kim Anderson". The signature is written in a cursive, flowing style.

Kim Anderson
Senior Regional Planner