April 23, 2014

Diane Nguyen, Deputy Director
555 E. Weber Avenue, Stockton, CA 95202

Dear Ms. Nguyen:

On behalf of the American Lung Association in California and ClimatePlan we are writing to express concerns with the progress indicators and long-term success of the San Joaquin Council of Governments' Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). First and foremost, we want to commend the hard work by staff and the Board to prepare the plan and engage in this first iteration of the SCS process under Senate Bill 375. We appreciate the open dialogue to discuss our comments and questions throughout this important process.

We are strong supporters of SB 375, knowing that land use and transportation decisions have real impacts on our health, environment, economy, and quality of life for people of all incomes. This plan presents many opportunities to maximize community benefits. We believe that the plan includes many indications that San Joaquin County is moving in the right direction.

However, in reviewing the RTP/SCS we have also noticed that, despite high reported achievements on SB 375 per capita greenhouse gas (GHG) emission reductions, the plan does not include a clear explanation of what factors lead to the GHG reductions. In addition, the plan also fails to maintain steady forward progress on a number of important indicators into the future. These indicators paint a different story than the model results. They raise concerns about the future success in reducing pollution and climate risk and improving healthier communities and active transportation. Our concerns related to the long-term viability and benefits of the plan are three-fold:

First, the draft modeling shows GHG reduction numbers well in excess of the targets, but other more modest indicators of the plan's performance raise questions about these high levels of target achievement. Even the business-as-usual planning scenario would achieve a GHG emission reduction of over 20 percent in 2040 (Appendix M, Table M-2). The narrative to explain how such large numbers are achieved is not clear. The plan would benefit from a clear explanation and a table expressing how individual policies and other, external factors (e.g., economic changes, gas prices, interregional trips) achieve levels of GHG reduction heretofore unseen in any region in the state.

Second, several indicators and measures of the plan's performance decline or begin to reverse their gains over time. Compared to a 2012 baseline, in 2040, a smaller share of travel would be by walking, biking, and transit (dEIR Table 4.12-3, appended). Congested lane miles would increase by over 50% compared to 2012 (dEIR p. 4.12-58). These are not

indicative of long-term success in reducing vehicle miles traveled (VMT) and suggest that overall GHG performance could also decline following 2035 or 2040.

Third, while modeling indicates that this plan would drastically exceed the 5% and 10% regional targets assigned under SB 375, it is not clear that the region is on a long-term trajectory of reducing greenhouse gases (GHG) from passenger travel. GHG emissions reductions under SB 375 would be greater in 2020 (24.4%) and decline slightly by 2035 (23.7%, a per capita increase of 0.7%) as compared to 2005 (dEIR p. 4.7-33, appended).[1] This suggests that the region's GHG from personal vehicle travel may be rising, rather than declining. This concern is deepened by the report that per capita VMT for all trips (not specifically SB 375 trips) would increase from 2012 to 2040 (dEIR Table 4.12-3), as would per capita mobile source GHG (dEIR Table 4.7-4, appended, with population estimates from dEIR Table 4.12-3).

Our concern is that the region may be experiencing a short-term decline, perhaps caused by the recession, followed by resuming a long-term upward trend. This "backsliding" is inconsistent with the intent of SB 375 and Executive Order (S-03-05), which set statewide targets for GHG reductions from every source by 2050. It is also not clear why the SB 375 GHG reductions are so great while other indicators, including ones that might reasonably be expected to trend in a similar direction, are flat or moving in the wrong direction. Given these facts, and the questions above, we are concerned that this plan may be challenged at the state level.

In closing, we believe that there is work to be done to address these issues and that both the COG and the California Air Resources Board (CARB) should move quickly to evaluate the GHG reduction calculations under SB 375 and the long-term trajectory of the plan's benefits in advance of the COG's adoption of the plan. The final plan should include a clear explanation of how SB 375 GHG reductions are reached, including descriptions of all model inputs and methodologies; demonstrate that the majority of reductions come from policy improvements, rather than economic shifts, rising gas prices, or other factors outside of the region's control; and clearly explain any unexpected or confusing modeling results that may occur.

We look forward to working with the COG and CARB to ensure the long-term success of the plan is aligned with the goals and expectations of SB 375 to provide residents with the greatest level of health, economic and environmental benefits today and into the future.

Sincerely,

Bonnie Holmes-Gen
Senior Director, Policy and Advocacy
American Lung Association in California

Autumn Bernstein
Director
ClimatePlan

CC: Mary Nichols and Richard Corey [California Air Resources Board], Ken Alex [Governor's Office of Planning & Research], Mike McCoy [Strategic Growth Council]

[1] Creating further question, the Executive Summary reports different GHG reductions, 23.9% by 2020 and 24.6% by 2035. The discrepancy from the EIR merits clarification.

Table 4.12-3
Plan Impacts on Key Transportation Measures vs. Existing and 2040 No Project

Indicators & Measures	2012 Existing	2040 Plan	2013–2040 Percentage Change with Plan	2040 No Project	2040 Plan vs. No Project % Change
Total Population	704,794	1,070,486	**52%**	1,070,486	0.0%
Total VMT per Weekday (Miles, in Thousands)	18,091	28,593	**58.0%**	28,795	0.7%
Congested Lane Miles (Level of Service D, E, F – PM 1 Hour)	408.6	989.5	**59%**	1,189.7	17%
Other Indicators					
Public Transit (Boardings)	93,972	129,657	**38%**	126,496	-2.4%
Transit (Walk+Drive Access)	2.09%	1.96%	**-6.22%**	1.68%	-14.3%
Bike+Walk (Non-Motorized)	4.16%	3.91%	**6.0%**	3.76%	3.8%
Single Occupancy Vehicle (SOV)	37.96%	37.89%	**-1.8%**	38.11%	0.5%
High Occupancy Vehicles (HOV) 2+ per vehicle	55.79%	56.24%	**0.8%**	56.44%	0.3%
Per Capita Vehicle Miles Traveled (VMT) (All Trips)	25.67	26.71	**4.0%**	26.90	0.7%

Source: SJCOG, 2014.

However, between 2012 and 2040 public transit boardings are projected increase by one third, although transit as a total share will drop to slightly under 2 percent. The share of trips by bicycle and walking will also drop to slightly under 4 percent. The share of trips by single-occupancy vehicles will fall by 1.8, and high-occupancy vehicle mode share will rise slightly to 56 percent of all trips. However, due to the substantial increase in population (approximately 365,694 persons), VMT per capita between 2012 and 2040 will rise by approximately 4 percent. Congested lane miles will also increase under the Plan from 408.6 existing lane miles operating at D, E, or F during the PM peak hour to 989.5 lane miles.

The last two columns of **Table 4.12-3** compares the Plan against the No Project alternative in which new transportation investments cease after 2015 while population and development continue to grow to forecast levels and development follows a more dispersed pattern than called for in the Plan. Compared to the No Project Alternative, the Plan would result in less VMT as well as an increase in transit boardings, more transit and bike trips as a percentage of total trips.

Thus, impacts on San Joaquin's overall circulation system resulting from implementation of the proposed 2014 RTP are considered potentially significant for **Impact TRANS-1.** Measures intended to reduce vehicle travel and improve LOS are part of the 2014 RTP. These include increasing transit use ridesharing and other measures to reduce demand on the transportation system; investments in non-motorized transportation; seeking to optimize land use/transportation connection; other travel demand measures

Table 4.7-4
Annual GHG Emissions – 2012 Compared to 2040

Source	2012 ($MTCO_2e$/Year)	2040 Plan ($MTCO_2e$/Year)	2040 No Project ($MTCO_2e$/Year)
Mobile Sources	3,508,974	6,013,068	6,296,640
Energy Use	1,540,053	1,708,438	1,782,639
Water Use	163,233	108,354	157,471
Construction	40,000	50,000	50,000
Total Emissions	**5,252,260**	**7,879,860**	**8,286,750**

As shown in **Table 4.7-4**, growth in San Joaquin County would result in an increase of approximately 2.6 $MMTCO_2e$ of GHG emissions in 2040 as compared to 2012 under the 2014 RTP/SCS. This represents a 50 percent increase from 2012 to 2040. Under the No Project Alternative, emissions would increase by 3.0 $MMTCO_2e$, or approximately 58 percent. It should be remembered in general that this is a very rough approximation in that it depends on many simplifying assumptions and does not include many types of sources. Also, emissions shown for both scenarios are highly conservative as the emission factors used do not reflect possible or planned improvements in the future from programs such as updated green building standards, advancements in energy efficiency, and increased use of electrical vehicles. Lastly, while the 2014 RTP/SCS includes many strategies for reducing GHG emissions from land use, the RTP does not have any authority over how land is actually developed in San Joaquin County. This analysis is provided only to adhere to the requirements of CEQA, but regardless the project would have a significant impact with regard to this threshold.

Level of Significance Before Mitigation

Significant.

Mitigation Measures

GHG-1: SJCOG shall update future Regional Transportation Plans (including Sustainable Community Strategies) to incorporate policies and measures that build upon successful GHG reduction strategies form the 2014 RTP/SCS and lead to further reduced greenhouse gas (GHG) emissions. Such policies and measures may be derived from the General Plans, local jurisdictions' Climate Action Plans (CAPs), and other adopted policies and plans of its member agencies that include GHG mitigation and adaptation measures or other sources.

activities; however, not all equipment has retrofit components and is therefore technologically infeasible at this time.

Implementation of the Plan would result in an increase in GHG emissions as a result of the estimated mobile source emissions (other than light duty vehicles which would meet the applicable target – see SB 375 discussion) and construction and energy demand associated with residential and commercial buildings. As appropriate, SJCOG will encourage lead agencies to adopt these mitigation measures through its Intergovernmental Review process. However, SJCOG cannot require implementing agencies to adopt these mitigation measures, as it is ultimately the responsibility of a lead agency to determine and adopt mitigation. However, SJCOG cannot require the implementing agency to adopt these mitigation measures because such agencies are ultimately responsible to determine and adopt mitigation. Therefore, this impact remains significant and unavoidable.

Impact GHG-3 Conflict with SB 375 GHG emission reduction targets.

SB 375 requires that local MPOs provide plans to reduce GHG emissions from cars and light trucks compared to 2005 levels. The specific reduction targets are determined by CARB. For San Joaquin County, CARB determined that the 2020 target is a 5 percent reduction from 2005 emissions levels, and the 2035 target is a 10 percent reduction. The 2014 RTP/SCS exceeds these targets, providing reductions of 24.4 percent in 2020 and 23.7 percent in 2035.

The RTP achieves the reductions by a mix of land use strategies, transportation management, economic factors, and road projects. The 2014 RTP/SCS also notes state and regional programs that assist in reaching the reductions targets, such as state funding for transportation management and infrastructure improvement, regional air district programs to replace inefficient or heavily polluting vehicles, regional energy planning, and efficient commuting programs.

Vehicle use and fuel consumption are also influenced by other factors, such as fuel prices and employment. These factors are included in the SB 375 calculations, similarly to the inclusion of the recession by CARB in tracking progress toward AB 32 goals. While these factors are not attributable to a purposeful effort by SJCOG, it is nevertheless allowable as a factor in calculating reductions for SB 375 as detailed by similar recession-based reductions discussed and included by CARB in their draft update to the AB 32 Scoping Plan. On page 99 of the proposed update, CARB provides an overview of emissions trends for the various sectors, as well as a total and per capita rate. Regarding the role of the recession in progress towards AB 32 goals they have this to say, "The recent recession had a major impact on GHG emissions between 2008 and 2009, when emissions decreased by almost 6 percent. Other changes reflect ongoing early implementation of Scoping Plan measures, energy efficiency actions, renewable power