



SAN JOAQUIN COUNCIL OF GOVERNMENTS

555 E. Weber Avenue • Stockton, California 95202 • P 209.235.0600 • F 209.235.0438 • www.sjco.org

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California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

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SAN JOAQUIN

RE: Comments on September 14, 2016 Public Workshop on the Transportation Sector in the AB32 Scoping Plan Update and Associated Documents

Thank-you for this opportunity to provide feedback on the September 14 public workshop. SJCOG previously provided comments on the AB 32 2030 Target Scoping Plan Concept Paper and will reiterate some of those comments here as appropriate.

General workshop comments: Most of the agencies and individuals offering comments at the workshop were predominantly in favor with most, if not all, of the ideas advanced in both the Draft Vibrant Communities and Landscapes (Vision) document and the Potential State-Level Strategies (VMT) document. An increased level of outreach is needed to insure that those with alternative views are aware of the process and are given opportunity to provide input. Business and development interests (outside of infill builders) were noticeably absent at the workshop. As noted in the Forward to the Vision document: "...land-use decisions are inherently difficult decisions that require consideration of many conflicts and trade-offs, and balancing the needs of many constituencies, including disadvantaged communities, businesses, local agencies, developers, and landowners." Early and consistent engagement with all potentially affected stakeholders will be critical to the update process.

Vision documents are useful in establishing shared goals, values and desired outcomes. They are less useful for prescribing specific implementing actions and performance measurement. Maximum flexibility in implementation will drive innovation and best practices in realizing California's climate change goals. SJCOG offers the following more specific comments:

- While the "Actions" section of the document speaks to the need for State, local, and regional governments to work together and identifies State priorities in support of regional and local governments, the language from the previous AB 32 scoping plan specifically called out SB 375's maintenance of regional flexibility in the development and implementation of Sustainable Communities Strategies (SCSs). Actions that use the SB 375 framework of State partnerships with local and regional agencies to design strategies and actions appropriate to the size, capacity, and needs of the specific region are likely to be more successful. Ultimately the success of these actions will be determined by how well the state, regional agencies, and local entities coordinate and partner with one another. The Vision document outlines a wide variety of STATE regulatory, incentives and policies – there is conspicuously little mention of true partnerships in the document. If the vision is only State centric without recognizing needed flexibility, regional planning agencies will struggle with local buy-in and investment.

- SJCOG has worked hard on local projects and initiatives toward implementation of its first Regional Transportation Plan (RTP) to include an SCS (adopted two short years ago in 2014). SJCOG and other regional agencies pushed to develop “ambitious and achievable” plans to meet greenhouse gas reductions goals. The emphasis moving forward should be on developing concrete strategies and real incentives to accelerate implementation of these forward looking plans, as opposed to numerical increases in the targets themselves. To continue pushing the targets for GHG emissions reductions ever higher potentially sets regional agencies up for failure and loses sight that the goal is robust implementation of the plans, not numerical calculations.
- 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. The State would do well to give regional and local agencies more tools to deliver on SCS plans. The loss of redevelopment, the reductions in available transportation funding, and the lack of extensive funding opportunities for local and regional agencies in Cap and Trade is worrisome when it comes to delivery of GHG emission per capita reductions. Reduction of barriers and incentives to implement plans must be as robust as guidelines and regulations. The financial incentives must be there to encourage private-public partnerships to achieve the State’s vision and goals.
- The push for zero emissions vehicles and infrastructure support is a positive one. New resources to make this happen rather than the cannibalizing already stretched existing resources is necessary to push accelerated market penetration. It should also be explicitly noted the dichotomy that may occur with more VMT attributable to better market penetration of both zero emissions vehicles and autonomous technology – VMT may increase while greenhouse gas emissions decrease. These are separate measures and should not be used interchangeably.

- The documents presented at the workshop list a plethora of actions, goals, and performance metrics. Care must be taken that what is listed in the visioning document and, ultimately in the scoping plan, does not translate to an onerous increase in the performance metrics required of MPOs in their RTPs. Strategic measures of plan success and, potentially, measures and targets for the selection of transportation projects for the RTP, must have readily available data and must not be at odds with the need of the MPO to demonstrate air quality conformity under the Federal Clean Air Act. MPOs will have to address new Federal planning rules in its planning processes - the non-performance based planning rules are to be incorporated in the current RTP cycle (adoption of a plan after May 28, 2016). However, the performance based planning rules will have a two-year phase-in where targets will need to be set and incorporated into the RTPs. It will be several years before this happens as currently only the safety rule has been finalized and started the two-year phase-in period – meaning it will be incorporated into this RTP planning cycle. The State’s development of performance metrics should mirror the slower federal process to allow coordination of metrics. This insures the compatibility of the metrics, allows for the identification of appropriate and adequate data for measurement, and decreases the burden on MPO staffs. Care must also be taken to note potential trade-offs in metrics. If additional metrics related to improving public health, social equity, affordable housing, and other quality of life measures are to be co-equal to GhG reductions and other existing air quality/transportation measures, trade-offs and effects between measures must be explored and understood.

Again, thank-you for this opportunity to comment on these early Scoping Plan documents. SJCOG will continue to follow the process of developing the Scoping Plan and will be providing additional comments as the draft plan is made available for review and comment.

Sincerely,



Andrew T. Chesley
Executive Director