SCAG
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April 6, 2017

Mary D. Nichols, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: ARB 2030 Target Scoping Plan Update

Dear Ms. Nichols,

Thanks for the opportunity to review the Draft Scoping Plan Update to meet the 2030 target. We appreciate the outreach efforts of ARB staff including a one-hour briefing to the SCAG Joint Policy Committees on January 5, 2017 which helped to inform our local elected officials about the Scoping Plan.

Attached please see SCAG comments focusing on the following six key topics:

- The Limitation of Using Vehicle-Miles Traveled (VMT) Reduction to Reach Greenhouse Gas (GHG) Reduction Targets/Goals
- Need for Regional Equity in Cap-and-Trade Greenhouse Gas Reduction Funds (GGRF) Allocation Considering Regional Needs Particularly Disadvantaged Communities
- Comments on Appendix C (Vibrant communities and Landscape and Potential State-Level Strategies to Advance Sustainable, Equitable Communities and Reduce Vehicle Miles Traveled (VMT)) as related to implementation feasibility
- Integration of the State Implementation Plan Measures with the Scoping Plan
- Further Clarifying that the Community-wide GHG Reduction Goal is not a Requirement for Local Jurisdictions
- Preparing for Unintended Consequences from the Improvements in Vehicle Fuel Efficiency

SCAG's comments are aimed to looking for opportunities for synergies between the Scoping Plan, SCAG's RTP/SCS and Air Quality Management Plans/State Implementation Plans, highlighting constraints for increasing SB 375 targets and need for flexibility, and preparing for unintended consequences. Additional comments containing clarification and editing suggestions are also attached to help improve the document.

We look forward to the revised draft and please contact me if you have questions.

Sincerely,

Hasan Ikhrata
Executive Director

ARB Draft 2030 Target Scoping Plan Update

SCAG Comments

April 6, 2017

1. The Limitation of Using VMT Reduction to Reach Climate Goals

On page 15, under Ongoing and Proposed Measures – Vibrant Communities and Landscapes/VMT Reduction Goal, it includes a goal of 15 percent reduction in total light duty VMT in 2050 referencing the Mobile Source Strategy. It should be noted that the 15% reduction is a statewide goal and not intended to be the sole responsibility by the MPOs through their respective RTPs/SCSs. At the ARB Board meeting on March 23, 2017, ARB staff's presentation also made it clear that the 15% VMT reduction is the joint responsibilities of the state and MPOs through their RTPs/SCSs. This point has also been clarified through the MPO/ARB consultation process with respect to the SB 375 target update, consistent with the language of the Draft Scoping Plan and Mobile Source Strategy.

With extensive bottom-up collaborative process with local jurisdictions and interested parties, SCAG's 2016 RTP/SCS is estimated to achieve an 18% per capita reduction in Greenhouse Gas (GHG) emissions in 2035, significantly exceeding the ARB target of 13%. However, even with the passage of Measure M in Los Angeles County in 2016, the region is unlikely to achieve further GHG reductions over the 18% level considering the significant improvements in vehicle fuel efficiency and the induced travel (i.e., rebound effects) by 2035. This finding is derived after undergoing extensive technical analysis in collaboration with the other large MPOs in the state.

As to the total VMT reductions from the respective baselines, SCAG's 2016 RTP/SCS shows an approximately 6% reduction in 2030 and 7% in 2040. Please note that 15% reduction goal in 2050 in the Draft Scoping Plan Update already includes SCAG's and other MPOs' adopted RTP/SCS in ARB's 2050 baseline, so an additional 15% reduction is needed statewide beyond MPOs' adopted RTP/SCS. This additional 15% reduction will be very difficult given that the Draft Scoping Plan Update calls for doubling the fuel efficiency, increasing to 49 miles/gallon in 2030 from today's 24 miles/gallon which will induce additional VMT since it will be cheaper to use a vehicle.

In summary, the Scoping Plan should include realistic expectations from the Transportation Sector associated with total light-duty VMT reduction.

(Please note that at the April 6, 2017 meeting, the SCAG Regional Council took action to approve SCAG's submittal to CARB of a recommended greenhouse gas (GHG) per capita reduction target for the region that is the same as the achievement in the 2016-2040

RTP/SCS — 18% in 2035. This recommendation would apply to the 2020 RTP/SCS and subsequent cycles of the SCS, and is conditioned upon a combination of actions or alternative equivalent measures further described below in the staff report (see Section entitled "SCAG'S TARGET RECOMMENDATIONS AND CONDITIONS"). For further details, please see item 2 via the link below: http://www.scag.ca.gov/committees/CommitteeDocLibrary/rc040617fullagn.pdf.)

2. **Need for Regional Equity in Cap-and-Trade/Greenhouse Gas Reduction Funds (GGRF) Allocation Considering Regional Needs Particularly Disadvantaged Communities**

   The Draft Scoping Plan expects the Cap-and Trade Program to achieve 25% to 40% of the total GHG reductions needed by 2030 (Page 58 Table III-1). The Cap-and-Trade auction proceeds have been used to support further GHG reduction efforts. However, up-to-date, there has been a regional disparity in Cap-and-Trade/GGRF Funding allocation. As a specific example, for the first two rounds of the Affordable Housing and Sustainable Communities (AHSC) Program funding, SCAG region has only received about a quarter of the total state funding while the region contains about a half of the state's population and two-thirds of the state's disadvantaged population pursuant to SB 535.

3. **Comments on Appendix C (Vibrant communities and Landscape and Potential State-Level Strategies to Advance Sustainable, Equitable Communities and Reduce Vehicle Miles Travel (VMT))**

   The two White Papers in Appendix C mostly provided high level discussions of the various potential strategies and actions. However, further details are needed with respect to, for example, the following:

   - What are the implementation feasibility and best practices of several suggested actions such as Growth Boundaries and establishing land conservation targets?
   - For the VMT reduction strategies, how to identify and emphasize those that have the potential to yield the greatest benefits of GHG emission reduction and criteria pollutant reduction?

   SCAG is encouraged by the recognition that pricing policies are integral to statewide efforts to meet GHG reduction goals and clearly believe that more can be done – both at the state level and locally – to facilitate further studies and demonstrations of pricing policies. SCAG is continuing to evaluate far reaching congestion pricing concepts, including strategic application of cordon pricing in the urban context, that are likely to have a profound impact on GHG reduction goals, local investment in new mobility options, while also serving as critical transportation demand management tools.

4. Integration of the State Implementation Plan Measures with the Scoping Plan

We appreciate ARB's effort to integrate multiple state planning efforts in the Proposed Scoping Plan Scenario, particularly the Mobile Source Strategy. We urge ARB to go further by integrating, prioritizing funding for, and accounting for the GHG reduction co-benefits of all significant measures in the air quality management plans/state implementation plans (AQMPs/SIPs) currently under development throughout the state, particularly the full scope of the "Further Deployment of Cleaner Technologies" measures in the 2016 South Coast AQMP. First of all, these SIP measures can yield substantial GHG reduction co-benefits as demonstrated in *Table III-1. Ranges of Estimated GHG and Air Pollution Reductions by Policy or Measure in 2030* of the Draft Scoping Plan (p. 57), and also represent an excellent opportunity for ARB to strengthen the state GHG programs to support greater air quality co-benefit. Secondly, these SIP measures, once approved by U.S. EPA as anticipated, will be legally enforceable and required to be implemented. Therefore, the GHG reduction co-benefits from these SIP measures have greater degree of enforceability and certainty. In addition, the 2016 South Coast AQMP has identified the need to secure significant incentive funding to implement measures in the AQMP especially the "Further Deployment of Cleaner Technologies" measures. The integration and prioritization of these SIP measures in the Propose Scoping Plan can provide and prioritize available GHG program funds to fill the large gap of the incentive funding needed for both attainment demonstration and eventual attainment of the health-based national ambient air quality standards. It is critical for the South Coast region to be able to demonstrate attainment now and actually attain by the statutory deadlines in the near future. Otherwise, the South Coast region may face the dire consequences of potential highway sanctions and transportation conformity lapse that can impede the implementation of critical transportation projects in the vast region. Finally, Environmental Justice/Disadvantaged Communities in the severe or extreme non-attainment areas such as the South Coast are disproportionately burdened by heavy pollution from criteria pollutants. The integration and prioritization of the SIP measures can yield tangible co-benefits of health benefits by reducing criteria and toxic air pollution in the EJ/disadvantaged communities.

5. Further Clarifying that the Communitywide GHG Reduction Goal is not a Requirement for Local Jurisdictions

On page 134 of the Draft Scoping Plan, it states that "ARB recommends that local governments aim to achieve community-wide goal to achieve emissions of no more than six metric tons CO2e per capita by 2030 and no more than two metric tons CO2e per capita by 2050." Appendix B also provides examples of local actions that can support the State's climate goals. While the Draft Scoping Plan has not included any new measures as requirements for local jurisdictions to implement to meeting the 2030 GHG reduction targets, it would be helpful for ARB to state explicitly that the communitywide goal is not a requirement for local jurisdictions.

Instead, a communitywide goal should be one of the many ways for the state to support local jurisdictions along with funding, regulatory incentives, technical assistance and other resources, to contribute to the statewide climate goals.

In addition, to meet the SB 32 and Executive Order (S-3-05) requirements for 2030 and 2050 respectively, both 2030 and 2050 should have maximum allowable GHG emissions. Therefore, given the projected statewide population, a statewide goal of GHG emission per capita could be estimated in 2030 and 2050. However, it should be noted that different local jurisdictions may be in different climate zones, have different industry mix, development patterns and public transit availability, accordingly a single numerical GHG emission level per capita for 2030 or 2050 may not be appropriate for all local jurisdictions. The climate goal for a given community should be achievable given its specific conditions. ARB and other state agencies should also be clearly aware of the significant local differences with respect to achieving a constant GHG reduction goal in implementing their respective programs.

6. Preparing for Unintended Consequences from the Improvements in Vehicle Fuel Efficiency

The Draft Scoping Plan Update calls for doubling the fuel efficiency, increasing from today's 24 miles/gallon to 49 miles/gallon in 2030. In addition, the Scoping Plan also includes an accelerated deployment of zero-emission vehicles to 4.3 million by 2030. Since the gasoline excise tax has been the primary source of state and federal funding for transportation investments, the Proposed Scoping Plan should also recognize that significant improvements in fuel efficiency including the accelerated deployment of zero-emission vehicles would adversely impact already insufficient transportation revenue sources. SCAG has advocated for more than a decade for the transition from a fuel-based tax to a mileage-based user fee among other strategies to establish a user fee based system that better reflects the true cost of transportation. State leadership and collaboration with local and regional partners on the implementation of road charges to fund transportation is critical. Such strategies provide the most promise for reducing VMT and associated GHG emissions.

Additional SCAG Staff Comments on ARB Draft Scoping Plan

#	Chapter/ Appendix	Page	Scoping Plan Language	Comments
1	Natural Environment and Working Lands	General		Conservation incentives, carbon sequestration methods, and economic impacts for working lands are very different from natural/habitat lands. There should be a more specific approach for farmland conservation, most importantly strategies and incentives to ensure stewardship or for farmers and ranchers to use the most efficient techniques for GHG sequestration. Since some farmlands/ranchlands contribute to GHG emissions, it would be helpful to see a two-tiered strategic approach: 1. Outline strategies to cut emissions on working lands, and 2. Outline strategies for sequestration on working lands. Currently, the plan is vague on these strategies.
2	Natural Environment and Working Lands	General		There could be a disproportionate cost burden placed on smaller independent farms to reduce emissions or sequester carbon. Therefore, language and strategies should be added that differentiate between large-scale industrial/factory farming and smaller, independent farms. Attention should be paid to what climate-smart agricultural techniques may be financially or otherwise onerous to small farms, especially in disadvantaged areas.
3	Natural Environment and Working Lands	General		Protecting and restoring biodiverisity is a critical aspect of a robust climate strategy, and should be paid stronger attention in the plan. A considerable number of high-biodiversity habitats that play a key role in ecosystem functioning are adjacent to urban and suburban communities, and largely do not have protected status. These habitats should be prioritized for conservation, especially in hillsides or riparian areas. Natural lands connectivity and wildlife corridor conservation should also be highly prioritized. Programs should be included that avoid a piecemeal approach to conservation that could disrupt habitat connectivity and species migration patterns. Consideration should be paid to linkages that 1) a reserve network that harbors the greatest climatic diversity will allow for greater adaptation and 2) maintaining species access to cooler climates as temperatures rise.
4	Natural Environment and Working Lands	General		Because natural landscapes transcend political boundaries, strategies that conserve and maintain natural lands on a regional level should be prioritized. Conservation agreements between cities, counties, and tribes should be encouraged. Regional Conservation Plans, Multiple Species Habitat Plans, and Natural Communities Conservation Plan/Habitat Conservation Plans are strategies that could be improved upon or expanded to reach conservation goals.
5	II. The Proposed Scenario	35	Reduction in vehicle miles traveled (VMT), to be achieved in part by continued implementation of SB 375 and regional Sustainable Community Strategies; forthcoming statewide implementation of SB 743; and additional VMT reduction strategies not specified in the Mobile Source Strategy, but included in the document “Potential VMT Reduction Strategies for Discussion” in Appendix C	"Potential VMT Reduction Strategies for Discussion" (Appendix C) was first presented during the proposed Scoping Plan process as potential strategies yet they are now being referred to in Table II-1 on pg. 35 as a path to further VMT reductions. Please clarify if Appendix C has become the defacto menu of VMT reduction measures or are these still just potential strategies as stated in the original document?
6	Section C. Transportation Sustainability	100	In fact, transport-related physical activity could result in reducing risks from chronic diseases	We suggest that the text should be revised to state, "Studies indicate" instead of "In fact," since these studies use models.

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7	Section C. Transportation Sustainability	102	Quadruple the proportion of trips taken by foot by 2030 (from a baseline of the 2010–2012 California Household Travel Survey). Strive for a nine-fold increase in the proportion of trips taken by bicycle by 2030 (from a baseline of the 2010–2012 California Household Travel Survey).	We believe that a quadrupling of the proportion of trips taken by foot would be dramatic and potentially unrealistic. Walk mode share accounted for 10.7% of trips in 2010-2012. Quadrupuling the proportion of trips would result in 42.8% increase by 2030, with a walk score of 14.4%. A 9-fold increase in the bicycle trips would mean a 1.6% mode share in 2010-2012 would result in a 14.4% mode share in 2030. This increase in bicycle trips appears to be more reasonable when compared to the walk trips, but the goals still appear to be lofty and aggressive. Overall, a change of this magnitude would require a major shift in land use and current transportation patterns. It would require a good portion of the trips be achievable within a 1-2 mile distance for walking. These goals might be achievable, if the State's work culture supports a largely telecommuting work environment and/or we saw major shifts in land use in suburban communites which strengthen their economic core to provide more jobs and housing. We also suggest that ARB clarify if the increase in walking trips is directly correlated with the assumption that public transit ridership would substantially increase. If so, please clarify if the walking trips are double counted as transit ridership would result in an average of two walking trips.
8	Section C. Transportation Sustainability	102	Continue research and development on transportation system infrastructure, including: o Integrate frameworks for lifecycle analysis of GHG emissions with life-cycle costs for pavement and large infrastructure projects, and o Health benefits and costs savings from shifting from driving to walking, bicycling, and transit use.	We suggest to add a third bullet to this section: Improve statewide data sets to integrate big data, improve data collection for active transportation, and investments in regional modeling capacity to provide information on the VMT reduction opportunities from proposed land use and transportation investments and programs.
9	Section C. Transportation Sustainability	102	Health benefits and costs savings from shifting from driving to walking, bicycling, and transit use.	We support this statement and would also support research into the economic benefits for providing affordable housing.
10	Section C. Transportation Sustainability	103	Strive, in passenger rail hubs, for a transit mode share of between 10 percent and 50 percent and for a walk and bike mode share of between 10 percent and 15 percent.	Please clarify as to what constitutes a "passenger rail hub" and whether this would include, for example, any inter-city passenger rail (Amtrak) or high-speed rail station, or whether a number of connecting passenger rail, commuter rail, and/or urban rail services are required. It is unclear whether the mode shares would apply only to trips terminating at or originating from the passenger rail station (ie., trips transferring to or from the passenger rail service) or whether this includes all trips occurring within an unspecified boundary of the passenger rail station. It is unclear how the range of 10 percent to 50 percent was determined or whether this takes into account existing mode shares.
11	Section C. Transportation Sustainability	106	Implement the Cleaner Technology and Fuels Scenario of CARB's Mobile Source Strategy, which includes: o 4.3 million zero emission and plug-in hybrid light-duty electric vehicles by 2030	The number of zero emissions vehicles forecasted appears to be inconsistent throughout the document. Please clarify if the total number of forcecasted zero emissions vehicle is 4.2 million or 4.3 million.
12	IV. Key Sectors	108	"Promoting stronger boundaries to suburban growth through enhanced support for sprawl containment mechanisms such as urban growth boundaries and transfer of development rights programs"	Please clarify if this statement will be supported with the full willingness and support from local land use authorities.
13	Natural Environment and Working Lands	109	"Promoting stronger boundaries to suburban growth . . ."	Change to "Minimize impacts of suburban growth though incentives for greenfield preservation and transfer of development rights programs."
14	Natural Environment and Working Lands	110	"Landowner, local, and regional decisions related to land use impact development patterns and associated natural and working land conversion rates; conversely conservation activities can support infill-oriented regional development and related transportation needs."	This sentence seems confusing, and might be interpreted as accusatory towards landowner, local and regional development decisions.

Additional SCAG Staff Comments on ARB Draft Scoping Plan

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15	Natural Environment and Working Lands	111	Senate Bill 1383 and the resultant Proposed SLCP Reduction Strategy identify a mix of voluntary, incentive-based, and potential regulatory actions to achieve significant emissions reductions from these sources. A variety of techniques will be employed to attain the best results for each specific farming operation, and effectively implementing a broad mix of strategies will reduce the GHG emissions from the agricultural sector significantly.	How will voluntary practices for agricultural land be incentivized? Will there be any policies to incentivize farmers to preserve actively farmed land, thereby discouraging conversion to more resource intensive land uses with higher GHG emissions? A great portion of agricultural land in the SCAG region is in economically disadvantaged areas, and balancing preservation and growth priorities is an ongoing challengeWhat strategies will be considered to protect farmland in areas where there may be a lack of resources or political support for conservation?
16	Natural Environment and Working Lands	116	Promote and provide incentives for infill development through community revitalization and urban greening and support for permanent and temporary voluntary conservation of lands under threat of development, paired with stewardship plans where possible.	Potential incentives should be specified.
17	Natural Environment and Working Lands	116	Promote the adoption of regional transportation and development plans, such as SB 375 Sustainable Communities Strategies and Climate Action Plans that prioritize infill and compact development and also consider the climate change impacts ofland use and management.	We believe that this statement is vague. How will the state promote the adoption of these plans? Will resources be provided to ensure jurisdictions can initiate, adopt and implement strategies that prioritize infill and compact development in partnership with other complementary strategies?
18	Natural Environment and Working Lands	116	Provide support and technical assistance for counties, cities, and regions to integrate natural and working lands conservation priorities into plans, drawing from existing Natural Community Conservation Plans, Habitat Conservation Plans, the State Wildlife Action Plan, and critical agricultural lands.	We believe that this statement needs further clarification. Would "critical agricultural lands" be part of the plan?
19	Section E. Waste Management	119	Production and use of bioenergy in the form of biofuels and renewable natural gas has the potential to reduce dependency on fossil fuels for the transportation sector	We agree that biofuel can produce less emissions when compared to fossil fuels. However, the effects from land use change have the potential to cause even more emissions than what would be caused by using fossil fuels alone. Would organic waste diversion and fuel conversion occur by diverting material to a near by facility; or would the breakdown occur on-site within the land fills?
20	Section E. Waste Management	124	Developing programmatic Environmental Impact Reports (EIRs) and model permit and guidance documents to assist in environmental review and CEQA for new facilities.	We believe that this statement needs further clarification. Please clarify if developing PEIRs would assist in tiering. For example, if Calrecycle developed a PEIR, could a landfill project tier off the PEIR? Or would the PEIR be developed to evaluate the environmental impact of a plan or policy? Additionally, please provide clarification as to the purpose of model permits and guidance documents. Would agencies integrate them as best management practices and/or mitigation measures, within their EIRs?
21	Implementing the Proposed Plan	137	Table VI: Climate Change Policies and Measures: By 2018, develop Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink . . .	We suggest that the Department of Agriculture be included as a lead agency along with the CNRA. A lot of indespensible knowledge and technical expertise will be missing from strategies if agricultural experts are not included.
22	EJAC recommendations	3	New projects must not create adverse impacts like displacement of existing residents.	Current State statute requires that projects that result in the removal of affordable housing units must replace the housing units. It is unclear if the intention here is for the requirement of non-displacement and if it is strictly intended for disadvantaged communities.
23	EJAC recommendations	4	Do not create new infrastructure that relies on fossil fuels, including natural gas, fracking, pipeline development, crude oil shipments and processing	We suggest the language be revised to state that we should minimize new infrastructure that rely on fossil fuels but should not completely avoid due to larger costs and efficiency

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24	EJAC recommendations	9	Climate investments and energy solutions (building retrofits, weatherization, solar, microgrids, etc.) must serve entire disadvantaged communities, rather than just individual buildings or homes. Other populations of note include: fixed-income, seniors, people with chronic conditions, and other low-income residents.	It is our opinion that benefits to individual families can still benefit the entire community and focusing on the entire community may result in a scenario where efficiency is not achieved
25	EJAC recommendations	24	Greenhouse Gas Reduction Fund projects must be transformative for disadvantaged communities, in ways defined by each community themselves.	We agree that Greenhouse Gas Reduction Fund Projects are good for encouraging community-specific needs. However, some projects that are otherwise beneficial may not meet certain community requirements while meeting them in other communities.