

From: Robert Leiter
To: [ARB Clerk of the Board](#)
Cc: Letter Ref. SB 375 targets and reporting
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Attachments: [STAY COOL - Letter ref CARB SB 375 Targets - 3-19-18.pdf](#)
Importance: High

To: CARB Chair and Board Members

On behalf of the Advisory Council of *STAY COOL for Grandkids*, I am submitting our comments on the Proposed Update to SB 375 Greenhouse Gas Emission Targets, which will be discussed at your Board's March 22-23 meeting (Agenda Item 18-2-4). Please include this letter in the public record for this agenda item.

Best regards,

Bob Leiter

STAY COOL for Grandkids (SC4G)

Chair, Advisory Council

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STAY COOL

PROTECT OUR GRANDKIDS FROM GLOBAL WARMING

March 19, 2018

Chair Mary Nichols and Board Members
California Air Resources Board
1001 I Street
Sacramento CA 95814

RE: Proposed Update to the SB 375 Greenhouse Gas Emission Targets

Dear Chair Nichols, Air Resources Board Members and staff:

We appreciate the opportunity to provide comments to the California Air Resources Board (CARB) on the Proposed Update to the SB 375 Greenhouse Gas Emission Targets, which you are considering at your meeting on March 22, 2018. This letter is also sent on behalf of San Diego Audubon Society.

STAY COOL for Grandkids (SC4G) is a non-profit organization of volunteer grandparents, elders and other citizens in the San Diego region dedicated to preserving a livable climate in the name of those too young to have a voice: our future generations. Along with other organizations in our region, we advocate for meaningful action on climate change and support policies that will have a lasting effect by reducing greenhouse gas emissions and protecting our quality of life. We also educate our youth and our peers on climate science, public policies, and practical actions to reduce greenhouse gas emissions. *San Diego Audubon Society* works to advance the protection of birds, other wildlife, and their habitats through education, habitat conservation and restoration, and advocacy. Implementing clear, ambitious, and enforceable GHG targets will have immense benefits for birds and other wildlife.

Why It's Important to Adopt Ambitious SB 375 Targets

We believe that it is unconscionable for any of us to leave the burden of mitigating and adapting to dangerous climate change on the shoulders of young people. By continuing to delay significant reductions in greenhouse gas emissions, we increase the likelihood of severe health impacts, food and water scarcity, irreversible damage to the natural environment, and untold degradation of the quality of life for future generations. Additionally, we risk handing young people alive today a bill of up to US\$535 trillion. This would be the cost of the "negative emissions" technologies required to remove atmospheric CO₂ to avoid dangerous climate change.¹

Intergenerational equity is at the heart of the lawsuit *Juliana v. United States*. The 21 plaintiffs, ranging in age from 10 to 20 years old, state that the federal government's refusal to take serious

¹James Hansen, et al, *Young people's burden: requirement of negative CO₂ emissions*; Journal of Earth System Dynamics, 18 July 2017.

action against climate change unlawfully puts the well-being of current generations ahead of future generations. So far, the courts agree. Despite attempts by the Trump Administration to have the case dismissed, in March 2018 the Ninth Circuit Court of Appeals allowed the suit to go to trial. This followed an earlier decision in November 2017, when U.S. District Court Judge Ann Aiken set a judicial precedent ruling that climate change may pose an unconstitutional burden on younger generations.

STAY COOL believes continuing the present rate of GHG emissions poses serious dangers to the well-being of our grandkids and all future generations. Our belief is founded on years of expert analysis done by thousands of atmospheric and ocean scientists around the world. Our concerns were further raised last fall by highly respected UC San Diego – Scripps Institution of Oceanography professor, Dr. V. Ramanathan. He reported that the odds of catastrophic global warming by 2050, if GHG emissions are not drastically reduced, are approximately 1 in 20 (PNAS 114 (39): 10315, September 2017). Clearly, none of us would get on an airplane if we knew the risks of crashing were 1 in 20, and we should not be willing to put our children and grandkids at that future climate risk either.

We believe that the California Air Resources Board (CARB) has the opportunity and the obligation to adopt ambitious Greenhouse Gas Emission Reduction Targets pursuant to SB 375, and to provide guidance to state, regional, and local governments on how to effectively implement plans and strategies that will lead to meeting and exceeding these targets by 2035 and beyond. There are over nine million children under the age of 18 currently living in California depending on us. There is no time to delay.

Analysis

For the reasons discussed above, STAY COOL believes it is essential for CARB to adopt ambitious 2035 GHG reduction targets, and to guide other public agencies and stakeholders as to how these targets can be met. The analysis conducted by MPO staffs and reviewed by CARB staff, provides a good baseline for considering more ambitious targets. At the same time, several stakeholder organizations have also carefully considered these issues and have put forward specific recommendations that are well founded. Based on our review of these documents, and discussions with the staffs of many of these public agencies and stakeholder organizations, we submit the following recommendations.

Recommendations

- 1. CARB should adopt a 2035 GHG emission reduction target for the San Diego Region that is no less than 21% and preferably up to 25%.**

We understand that primarily because of technical issues, CARB and SANDAG staff believe that it would be difficult to replicate the 21% GHG reduction in 2035 that was reflected in SANDAG's most recently adopted RTP/SCS. However, at the same time we believe that by working together,

CARB and SANDAG staffs will be able to identify opportunities for the San Diego Region to receive GHG reduction credit for “multiple-benefit” projects and programs that include quantifiable regional GHG reduction benefits, as well as for “multi-jurisdictional” projects and programs.

In addition, we are recommending that CARB staff work with SANDAG staff and the other affected state, regional and local public agencies to expedite the implementation of SB 743 in the San Diego region, and to quantify the regional GHG reduction benefits that will result from implementation of SB 743 by public agencies in the San Diego region in the coming years. We believe that by working together, CARB and SANDAG staffs can identify feasible strategies that would allow SANDAG to meet an SB 375 GHG reduction target of at least 21% in 2035, and perhaps as high as 25%. We also feel that the work that would be done by CARB and SANDAG in this effort would be transferable in many cases to other MPO regions for which SB 375 targets are being set. Additional details on each of these recommendations is set forth below.

2. CARB should direct its staff to work with SANDAG to provide guidance regarding the use of “multiple-benefit” plans, projects and programs to obtain GHG reduction credits in the SB 375 planning process.

There are a variety of possible projects and programs that could provide multiple benefits from an environmental, economic and social equity perspective, and would potentially be creditable toward meeting GHG reduction targets for SANDAG and other MPOs. In addition, it should be emphasized that multiple-benefit projects and programs can often qualify for funding from sources other than the traditional transportation-related sources.

A good example of a potential multiple-benefit approach in transportation is the combined use of “Complete Streets” and “Green Streets” design concepts for roadway replacements and extensions. The use of “Complete Streets” that improve multi-modal access and safety is a well-accepted GHG reduction strategy that is being implemented in local communities throughout San Diego region pursuant the *Regional Complete Streets Policy*² that was adopted by SANDAG in 2014. “Green Streets” can include the same travel way design as Complete Streets but are also designed to meet specific stormwater pollution reduction requirements and have been approved by the San Diego Regional Water Quality Control Board. Green Streets can also provide significant water conservation benefits, along with other co-benefits. The San Diego County Public Works Department has now incorporated “Green Streets Guidelines” into its adopted *BMP Design Manual*³, and other local governments in the San Diego region are following the County’s lead. The use of a combined “Complete Street / Green Street” concept is thus a cost-effective way for new development and redevelopment projects to help meet their transportation improvement requirements and their stormwater pollution reduction requirements. At the same time, by

² http://www.sandag.org/uploads/publicationid/publicationid_1909_18570.pdf.

³ https://www.sandiegocounty.gov/content/sdc/dpw/watersheds/DevelopmentandConstruction/BMP_Design_Manual.html ; see Appendix K-2, Green Street Guidelines

taking this multiple-benefit approach such projects could qualify for use of SB 1 transportation funds as well as other State grant programs for water conservation projects, including set-aside funds for disadvantaged communities.

We believe there are many other opportunities to incorporate “climate-smart” strategies and design features into plans, projects and programs. Some examples are:

- Habitat conservation plans and strategies;
- Watershed management plans and strategies;
- Water resource plans and strategies;
- Affordable housing strategies; and
- Coastal access and visitor transport strategies.

In developing this guidance, SANDAG and CARB staff should encourage participation by regional and local government agencies, along with key stakeholder groups. In addition, CARB staff should solicit input from affected State agencies such as California Department of Fish and Wildlife, Department of Water Resources, San Diego Regional Water Quality Control Board, Department of Housing and Community Development, California Coastal Commission, Caltrans, and the Governor’s Office of Planning and Research.

3. CARB should direct its staff to work with SANDAG to provide clear guidance regarding how credits for GHG reductions from “multi-jurisdictional” plans, projects and program should be allocated.

This would include not only major highway and public transit infrastructure such as “managed lanes” (which can often be financially supported by several different public agencies), but also transportation projects and programs that directly serve major public facilities, such as education facilities, airports, and port transportation projects. Most of the local governments (cities and County) in the San Diego region have either adopted or are in the process of completing and adopting Climate Action Plans. In addition, many public agencies other than local governments have developed and adopted Climate Action Plans. A notable recent example is the *San Diego Unified School District Climate Mitigation and Adaptation Plan* adopted in October 2017. This plan includes a commitment to 100% renewable energy, along with actions related to climate-smart transportation options for students, faculty and staff.

It should be noted here that existing state laws, including the California Environmental Quality Act, allow a public agency to establish a mitigation program to help pay for projects and programs necessitated by new development and redevelopment within its jurisdiction. This principle applies not only to local governments but also to development projects approved by any state, regional or local public agency, such as: educational institutions (e.g., public universities,

community colleges, school districts, etc.); public airport facilities, public port facilities, and other public uses that place significant demands on the regional and local transportation systems.

CARB should work with SANDAG to clarify how the strategies contained in locally adopted Climate Action Plans should be credited toward helping SANDAG meet the regional GHG reduction targets related to transportation and built environment, and how multi-jurisdictional projects should be handled.

4. CARB should direct its staff to assist SANDAG in expediting the implementation of SB 743 within the San Diego region.

As discussed in the CARB staff report, SB 743, which was enacted in 2013, “creates a process to change the way transportation impacts are analyzed under the California Environmental Quality Act (CEQA). Specifically, SB 743 requires the Governor’s Office of Planning and Research to develop updates to the CEQA Guidelines to guide the analysis of project-level transportation impacts. Once the updated Guidelines go into effect, lead agencies will evaluate vehicle travel associated with new development as part of the project’s environmental review, and, if the impact is significant, mitigate those impacts through vehicle travel-reducing measures, which will support achievement of SB 375 goals.” (p. 12)

We agree that implementation of this law is a critical link in helping the state and the regions meet their GHG reduction targets, and we believe that the MPOs will play a crucial role in its implementation. However, there have been serious delays in completing the steps necessary to properly implement SB 743. CARB staff should work with the Governor’s Office of Planning and Research and SANDAG to expedite the implementation of this important law in the San Diego region.

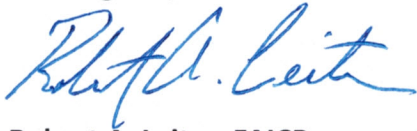
Conclusions

We appreciate the opportunity to provide input to the CARB Board and staff for your consideration in your SB 375 target-setting process. We also wish to note that we support the recommendations contained in the letter from ClimatePlan, dated March 12, 2018, and the letter from SWIA, dated March 15, 2018. We strongly believe that by setting ambitious SB 375 targets, while at the same time helping SANDAG and the other MPOs to incorporate innovative projects and programs in their next round of RTP/SCSs, CARB will continue to lead the way on these vital endeavors. We would also like to express our willingness to help in whatever way we can in this process.

Please feel free to contact STAY COOL Advisory Council members Bob Leiter at rleiter9@cox.net or Linda Pratt at lgpratt@sbcglobal.net if you have specific questions regarding the comments contained in this letter.

California Air Resources Board
SB 375 Greenhouse Gas Emission Targets – March 22, 2018

Best regards,



Robert A. Leiter, FAICP
STAY COOL for Grandkids - Advisory Council Chair

cc: Jim Peugh, Conservation Committee Chair, San Diego Audubon Society
Chris Redfern, Executive Director, San Diego Audubon Society