

**Date:** 4-19-2016

**From:** Dan Titus, Alta Loma California & Kathy Ponce, Fontana California

**To:** The Fontana Planning Commission

**RE:** Comments and Questions Regarding the Fontana Climate Action Plan

**Distribution:**

- Larry Meyer - Vice Chairperson
- Peter Garcia - Secretary
- Kareem Gongora - Commissioner
- Daniel Quiroga - Commissioner
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**Overview**

Several months ago, I was invited by Kathy Ponce to do a presentation on Sustainable Development for The Freedom Tea Party Patriots of Fontana. I was gratified to see a few people from the city and opinion leaders from the community at the event. I have been working with Kathy and others to formulate a response to the Fontana Climate Action Plan Draft. The rest of this paper is that response to date.

A Climate Action Plan (CAP) appears to be a Trojan horse that sets into motion Sustainable Community Strategy (SCS) parameters and reinforces these through continued solicitation of SCS grants. Also, the city is motivated by developer fees. The plan is 100% voluntary; however, by approving a CAP, the city agrees to yet more state control, costs and regulation via follow ups for the CAP. For example, Green House Gas (GHG) inventories will be required every 5 years<sup>3</sup>. Builders already build to “green standards”, which makes much of a CAP unnecessary and redundant.

The city steps into the states sphere of influence by agreeing to a voluntary request. This dilutes our elected official’s authority as it is usurped, and in many cases abdicated away. This regional form of *governance* is not how our form of *government*, in a democratic republic, was designed to operate.

Our contention is that a CAP is voluntary. Therefore, there is really no problem to address. However, consultants and staff generally promote CAPs as a way to generate

revenue, solve developer problems, and protect the city from litigation. All without regard to the financial constraints necessary to protect taxpayers and property rights.

This CAP Plan has many serious questions and concerns. While our City Manager may state that this plan is to give developers a financial break, it has more about transportation and development plans. The wording is questionable in regards to the direction the city is heading. We cannot put a plan in place that would make us a slave to a governing body (SCAG/SANBAG). We cannot have our development rights as a community taken away from us or used as a weapon for monetary gains as per the planning recommendations of unelected agencies, boards, bodies and commissions. Our position is simple:

1. CAPs are not required. It is 100% voluntary

According to the report, *Agenda 21: Sustainable Development in California*, "City carbon inventories are voluntary. The California Air Resources Board (CARB) scoping plan implementing AB 32 cannot specifically mandate that each individual city adopt its own greenhouse gas reduction plan to meet AB 32 targets."

2. CAPs are designed to save developers money

SanBag claims, 'Climate Action Plans (CAPs) are created to streamline developer projects. According to Katheryn Lin, the CAP process would, "save developer money as they don't have to create their own CEQA for greenhouse gasses, saving six to nine months of processing time...the CAP only applies to the CEQA requirement of for CO2 reduction. Projects will still have to meet criteria for 'other' CEQA requirements."

Therefore, the CAP is designed to save developers money, offering only marginal economies at taxpayers expense. For example, the projected cost savings would only be between \$2 -\$5K per project.

3. CAPs create opportunities for grant money

SanBag claims that a CAP plan increases grant opportunities for the city: transportation, infrastructure, cap and trade, water conservation, planning, affordable housing, etc. Having a CAP will put the city in a more competitive position when seeking grant opportunities. This is why half the cities in California already have a CAP. Conversely, it can be argued, that half of the cities in California have not expensed valuable resources in seeking grant money because of increased regulation brought on by grant terms and conditions.

4. CAPs are necessary because the threat of lawsuits

In response to the question do we need a CAP? The answer is no. However, CAPs are generally sold as a preemptive measure in regards to lawsuits. Cities can be sued if

they have a CAP; they can be sued if they don't have a CAP. There are no guarantees. Therefore, this "*bandwagon fallacy*", where the argument is to do something as validator, is moot.

#### 5. CAPs have ongoing operations and maintenance costs

Builders already build to "green standards", therefore a CAP is redundant. In addition to initial development costs for the CAP there are ongoing maintenance costs. For example, there are initial costs of about \$48K to SanBag.

#### 6. CAPs are the local implementation of regional plans for Sustainable Development

Sustainable Development (SD) is a scheme to transform economies from price-based systems, to a carbon-credit resourced-based system. Under the guise of protecting the poor through social equity and social justice wealth redistribution programs, poor people are being used as an excuse subsidize governments through increased costs, prices and fees. SD seeks behavior modification based on artificial scarcities, much of which is created by government agency policies. This is being promoted through Green House Gas (GHG) reduction policies, which have ever changing reduction goals<sup>3</sup>. SD constrains energy output. As prices go up, people use less of a product or service. For example, electricity and water. SD embraces, forced conservation or rationing. Locally, SD is fomented through Sustainable Community Strategies (SCS) in city general plans, the Countywide Vision, and local climate action plans. A primary driver for SD is the Southern California Association of Governments (SCAG). To help finance SCAGs \$565 billion dollar 2016 RTP/SCS, they plan on installing a vehicle mileage tax (VMT) by

- Making adjustments to state and federal gas excise tax rates and the long-term replacement of gas taxes with mileage-based user fees<sup>3</sup>.

Fontana's draft CAP plan is implementing SD using flawed models for their greenhouse inventory forecasts<sup>1</sup>, which embrace behavior modification techniques without consideration to the financial impacts to residents and businesses. The CAP seeks GHG reduction through increased costs for water and energy producers. These costs will be passed on to the consumer in the way of higher prices. Fontana is falling into a never ending planning regime being foisted by SCAG through international influences.

#### **Position**

- We want our questions considered and answered by the planning commission before bringing the Fontana Climate Action Draft forward for a vote.

## Comments Questions Regarding the Fontana CAP

**Question 1:** Please explain how the CAP plan is a requirement.

**Question 2:** How will solutions to reduce GHG emissions financially impact business, residents, and property owners in Fontana over the next 5 years? 10 years? Specifically in regards to:

- Building energy
- On-Road Transportation
- Off-Road Equipment
- Solid Waste Management
- Water Conveyance
- Agriculture

**Question 3:**

Page 1 – “The city of Fontana recognizes the threat of anthropogenic climate change, related to human activities...”

"Climate change," according to the National Academy of Sciences, refers to any significant, measurable change of climate lasting for an extended period...

Define what is significant, how that measure was determined, and by whom. How do you accurately and separately identify “natural factors” from “human activities”?

**Question 4:**

Page 1: “... {The city of Fontana} is committed to reducing community green house gas (GHG) emissions in order to prepare for a sustainable future, in which residents are healthy, businesses thrive, and communities prosper.”

- Please define “healthy” and specifically show quantitatively how this term will benefit businesses and residents, and property owners in Fontana.
- Please define “thrive” and quantitatively show how businesses and residents, and property owners will benefit from the CAP.

**Question 6:** Page 3 – “Implementing the plan will require collaboration between ... businesses and residents.”.

Please define “require” given the fact the CAP is voluntary? Furthermore,

- Define “collaboration” and illustrate specifically how this will be accomplished.

**Question 7:** Will the city have to retrofit all buildings to renewables to get to a zero carbon footprint by installing solar?

**Question 8:** Page 6 - Introduction; 1.4 SANBAG Reduction Plan.

The statement "This Regional Reduction Plan aims to be the predecessor to a local climate action plan for each city."

- Why do we need to have a plan that includes 21 other cities?
- Why are some cities in the County not participating
- Will our CAP plan or SANBAGs CAP Plan be the final say for our City?

**Question 9:** Page 9 - Background. 2.2 Climate Change Science.

Climate Change is NOT a proven science. We researched numerous articles including articles from the New York Times and Washington Post stating Climate Change is NOT a proven science but rather a philosophical belief.

**Question 10:** Page 21- Chapter 4: GHG Reduction Measures

a. We have issues with the following statement:

*"To achieve GHG reductions from the transportation sector, the City will incorporate policies in its General Plan that reduce dependence on motor vehicles and encourage alternative and active transportation through enhanced land use patterns, transit oriented development, and complete street strategies".*

- a. How these policies benefit the citizens and residents of Fontana given the fact that mass transit is subsidized at tax payer expense?
- b. How will complete streets strategies impact local police and fire services that need access beyond one lane through fares?
- c. How will "enhanced land use patterns" benefit the community and at the same time protect property rights?
- d. How will reducing dependence on motor vehicles impact the community as a whole in relationship to:
  - Economy and jobs
  - Safety: Disabled, Senior citizens and young people.
  - Mobility: Please explain how walkable/bicycle developments interface with the element of safety mentioned above.

#### State 1 – Renewable Portfolio Standard

Please explain how “Renewable Portfolio Standards”, which require energy producers to use renewable energy sources, are cost effective given that these sources are already subsidized, inefficient and will cost consumers more in the way of pass through costs.

#### State 2 – Title 24 Standards

Please explain how the city of Fontana will enforce “Energy Efficient Standards”. Also, please outline the enforcement plan and estimate the costs associated with enforcement.

#### State 3 – AB 1109: Lighting Efficiency Standards

Please explain how reducing electricity usage will benefit the consumer in given that efficiencies have already been realized. Please explain what is met by reducing indoor lighting by 50%. Efficiency and lighting reduction are separate issues.

- Will the city of Fontana go beyond the provisions cited in AB 1109 and mandate reduction of GHG reductions through ordinance?
- If so, please report on this in regards to cost/benefit analysis and cost to the consumers.

#### State 4 – AB 1470, Solar Water Heating

- How will solar water heaters benefit the consumer and reduce GHG emissions, given that solar is subsidized?
- Please provide an analysis of this program including where the \$25 million for this program is coming from.

#### State 5 – Industrial Boiler Efficiency

- Please provide an analysis of how tuning boilers, and oxygen trim systems would maximize boiler efficiency. Please explain how this will reduce 2,656 metric tons of CO<sub>2</sub> and how the state plans to implement this in relationship to the Fontana CAP plan.
- What enforcement mechanisms will the state impose on Fontana?

## State 6 – AB 1493: GHG Reduction from new Passenger Vehicles

The state contends that manufactures must meet California fuel standards for vehicles. Fuel standards “are expected” to be increased by 2020 to reduce GHG emissions by 168,956 metric tons.

- What has been the success of this program in regards to net metric ton realized to date and in relationship to reductions in the past in order to calculate efficiencies?
- How will economies impact the overall state goals in regards to GHG in relation to Fontana’s CAP plan?
- What are the standard deviations with regards to pollution caused by other actors in regards to this program? For example, how is pollution from China and the Pacific Rim being factored in to models and how is leakage from other cities impacting Fontana specifically?

## State 7 – AB 32 Transportation Reduction Strategies

"Within the AB 32 Scoping plan are recommendations that focus on vehicle maintained practices to reduce GHG emissions. This includes assuring tire pressure is maintained to manufacturer specifications, and recommending low friction engine oils and cool paints and reflective glazing, among other maintained methods. This measure will be implemented by the State."

- Why are we putting these state regulations into our City CAP Plan?

This section states "While many of these regulations do not require action by local governments, the GHG emissions reductions associated with the implementation of the regulations would reduce GHG emissions for Fontana." Clearly stated in CAP plan that they are not required, so

- Why are we adding more requirements?

If the City adopts these into the City specific CAP plan who, then will be held responsible for implementation?

- How will the State measure the success of “recommendations” outlined in this section?
- How will this be enforced and how will vehicle maintenance practices empirically reduce GHG levels in Fontana?

## State 8 - EO S-1-07 Low Carbon Fuel Standard

The state claims that Fontana will realize GHG reductions in the city by lowering the “carbon intensity” of transportation fuels burned in their community.

- How will the states claim impact fuel costs in Fontana specifically in regards to emission reduction as it relates to production, transportation and distribution of fuels?
- What are the costs on a per capita basis for motorists in Fontana?

## State 9 – AB 32 Methane Capture

If landfill operators implement methane capture systems into their operations as a state mandate, costs will be passed on to the consumer.

- What is the estimated GHG reduction realized for this program in Fontana?
- What will be the increase in trash fees for residents and businesses in Fontana?

## County 1 – Methane Capture Systems

Please substantiate the claim that installing methane capture systems in county owned and operated landfills would specifically benefit Fontana as they “see emission reductions from the solid waste sector by reducing the methane emissions associated with the decomposition of city-generated waste”.

- What will be the rate increase passed on to consumers for trash fees associated with this program?

## Page 26 - Local Reduction Measures.

The statement in question: “Fontana is choosing to exceed its requirements for GHG emissions.”

- Who chose to exceed this?
- Why don't we just meet the requirements set forth rather than putting the city under more laws/regulations?
- Were there any incentives for going above and beyond the goal of reducing GHG reduction by 15% below 2008 levels by 2020?
- Also, please quantify baseline GHG levels in Fontana in 2008. Show specific models and methodology used in all computations.

## Page 27 – Local T-1: Sustainable Communities Strategy

“The City Of Fontana will work with SCAG to select and implement strategies from the Sustainable Communities Strategy (SCS). The City is not required to follow any of the



land use patterns adopted in the SCS. However, the strategies from which Fontana will select will assist the City in implementing transit-oriented development , infill housing, mixed-use development, and public transportation expansion. For strategies requiring transportation improvements, the City of Fontana will collaborate with SANBAG to enable these improvements."

**Comment:** Cities are not required to implement land use planning as per AB 375. It is voluntary. The Southern California Association of Governments is a planning agency, as such, their charter is to make recommendations. Therefore, regional transportation plans do not need to be adopted, as recommendations are voluntary. AB 32 and the California Air Resources Board (CARB) Scoping Plan implementing AB 32 cannot specifically mandate that each individual city adopt its own Climate Action Plan (CAP). Furthermore, as per SB 375, "Nothing in a Sustainable Communities Strategy (SCS) shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region."

Page 27 references the SCAG Regional Transportation Plan for 2012. SCAG adopted their new plan in early April 2016. It would appear that the Fontana CAP is out of date and therefore, needs to be updated as per SCAGS new plan. Planners plan; SCAGs four year, long-range planning cycles are redundant and expensive to develop. This planning cycle puts tremendous pressure on cities who agree to sign on to these plans for the short-term gain of grants and development fees. SCS destroys the existing ambiance of cities and once it is implemented, there is no going back.

- Why would Fontana sign on to a long range plan that is relative and always changing with no concrete finite goal to win? Example, SCAG adopts its RTS/SCS every four years and the Governor issues arbitrary conservation percentages for water.
- Please adjust all forecasts in the Fontana CAP plan to correlate with the SCAG Regional Transportation Plan – Sustainable Communities Strategy for 2016.
- How will the CAP be adjusted for the Governor as per the latest executive order regarding mandatory reductions in water usage?

Membership in SCAG is 100% voluntary. As per paragraph 3 on page 27, "The city is not required to follow and of the land use patterns adopted in the SCS. Please explain why:

- The city is a member of this organization,
- how it benefits citizens and residents and
- how subordinating the city to an unelected regional governance body maintains the continuity of a Republican form of government.

- Why is the city subordinating its authority to SCAG and appealing to them in regards to implementing transit-oriented development, mixed-use development and infill housing?

Why is the city of Fontana implementing a strategy that is voluntary?

In the first paragraph on page 27: Please explain what is met by “funding priorities” in order to reduce GHG reduction goals?

The SCS implementation will fall on the Planning department.

What are the estimated costs and overhead to the city for implementing the SCS?

What is the estimated costs for consultants and experts to for SCS?

Please address all SCS program costs in relation to:

- Development costs
- Implementation costs
- Operational costs
- Maintenance costs

Paragraph 2, page 27 states. “The investments in the RTP/SCS are expected to result in significant benefits to the region with the respect to transportation and mobility, as well as air quality, economic activity, and job creation, sustainability and environmental justice. They will result in better placemaking, lower overall costs, improvements in public health and the environment, responsiveness to a changing housing market, and improved access to mobility”

- Please define the word “Investments”.
- Please quantify benefits in regards to the region for transportation and mobility given that SCS strategies constrain choice and cost more.
- How will the costs of incorporating walkable/bicycle mobility translate in to economies for the residents of Fontana?
- What are all the forecasted costs related to the walkable/bicycle strategy in Fontana?
- How will the city finance the SCS? Will “investments” be collected through increased fees, taxes and property taxes?
- How will proposed vehicle mileage taxes (VMT), which are designed to influence peoples behavior, factor into the SCS?
- How will investments in the RTP/SCS benefit air quality given the fact that SCAGs long range plans are always changing?
- How will investments in the RTP/SCS benefit economic activity?

- How will investments in the RTP/SCS benefit job creation?
- Please define “sustainability” and illustrate how it will benefit investments in the RTP/SCS?
- Please define “environmental justice” and illustrate how it will benefit investments in the RTP/SCS?
- Please define “better placemaking” and show how it will result in better investments in relation to the RTP/SCS?
- Please compare and contrast “quality of place” with “quality of life” and how this philosophy will work in relationship to the Fontana CAP and GP update.
- How will the Fontana CAP, in relationship to RTP/SCS investments, lower overall costs for the city and the residents that reside there?
- How will the RTP/SCS investments improve public health?
- Please define “environment”. How will the RTP/SCS investments improve the environment?
- How will the RTP/SCS investments improve responsiveness to a changing housing market?
- Please compare and contrast the statement “changing housing market”, and the demand metrics for this market in relation to the RTP/SCS?
- Please explain how Priority Development Areas (PDAs) benefit the community in relationship to housing costs associated with them.
- Please explain how high-density zoning, which constrains traditional single-housing choice, benefits the community?
- Please explain how the RTP/SCS investments will improve access to mobility?
- How much will subsidized mass-transit solutions cost the tax payer and how will these solutions benefit residents in Fontana given the fact that ride-sharing services, like Uber, now economically compete with mass-transit?
- Why doesn't the Fontana CAP address ride-sharing as a solution?

Page 31 – Local BE-3: Implement SB X7-7: Energy Savings from Water Reductions

SB X7-7 states that urban water agencies in California must increase conservation to achieve a statewide goal of 20% reduction in per capita water use compared to 2005, by 2020. The premise: less water use would reduce GHG in production of water.

- How is resource conservation benefiting the residents in the city in regards to reduced energy use?
- What is the cost savings being calculated to arrive at the 33,265 CO2 reduction?
- Please show how this program “benefits” property values and why?

- How is the Fontana CAP being adjusted for mandatory conservation set by the Governor?
- Will the city and residents receive a credit if they conserve more than forecasted amounts?
- What is the cities remedy for disputes regarding water given that fact that the current drought was caused by agency mismanagement?
- Why is the city adopting a plan to constrain water use, thereby creating artificial scarcity, when according to water providers, San Bernardino has over a ten year supply of water stored?

#### Page 32 – Energy Savings from Wastewater Treatment

- How does monitoring per capita ware use fit into the goal of managing wastewater?
- How does “reduced energy usage” in regards to production costs for water factor into increased property values?

#### Page 33 – Energy Savings from Conveyance (Pumping)

The price of water delivered to the consumer includes costs for pumping the water. The rationale for conservation is to pump less water, thereby reducing electricity usage, which in theory would reduce CO<sub>2</sub> in the air because water producers are moving less water. This is held out as “conservation” but in reality it is creating artificial market scarcities for a commodity, which drives up prices. The irony here, is water companies have been forced to raise prices because people have conserved too much water and the water companies have had to raise prices to break-even. This is called blowback or unintended consequences.

- What is the city of Fontana doing to mitigate blowback and to hold water districts accountable in regards to overhead costs and water production costs?
- How does demand management of monitoring per capita ware use fit into the goal of managing overall goal of reducing energy usage.
- What will be the specific demand management monitor technology specified and associated costs?
- What will be the enforcement mechanism that will be used to control water usage and costs?
- How does “reduced energy usage” in regards to production costs for water factor into increased property values?
- By agreeing to the performance goals set by the state and SCAG, the city sets itself up for potential liability. What is the remedy for residences and businesses

as per the CAP in regards litigation that may result from agency and consultant negligence?

#### Page 34: GHG Performance Standards for New Development

- How would establishing new building performance standards that reduce GHG emission at least 29% by 2020 benefit potential homebuyers in Fontana?
- How are/were the performance standards for the screening tables in Fontana developed?
- How will performance standards and screening tables be measured and reviewed?
  - By what agency?
  - What is the cost of review process?
- What are the increased costs associated performance standards for builders and therefor, estimated price increase for buyers?
- What is the cost to develop performance, implement, operate and maintain the performance standards, including promoting costs?
- Who will enforce the performance standards and related costs to operate and maintain the program?
- Why is the city of Fontana “collaborating” with other cities to “develop consistent screening tables”?
- Please explain what is met by, “Include screening tables in entitlement process”.
- How can an estimate for GHG emissions reductions be provided when there is no accurate estimate of future new development?
- How was the estimate of 13,575 metric tons of CO2 calculated?
- What does it mean to say. “...adopt achievable reduction measures to reduce project emissions to a certain level below business-as-usual project emissions”?
- The screening table will allow builders to mix and match choice.
- They will be able to choose criteria that they can implement into projects, which will add up to a desired mitigation of CO2.
- What is the forecasted development fees in revenue that correspond to forecasted CO2 reduction?
- What is the forecasted value in builder CEQA and fee waivers that correspond with forecasted CO2 reduction?
- Please justify changes in Fontana’s general plan in regards to zoning changes for future specific plans and explain why the city is doing this as it relates to a priced based economy. In other words why is the city constraining market forces by rezoning areas that were/are already zoned?

## Costs for Fontana CAP

We have been told that there was not grant money used in the development of the Fontana CAP. We know that money was paid to SanBag.

Please item all money inputs for the development of the CAP to date, denoting sources.

Plases provide us with a budget for the implementation, operation and maintenance of the CAP, including consultant and staff time.

## Appendix A: Section Methods

### Page 5-1

“Municipal Inventory: The municipal inventory includes GHG emissions associated with the city’s services and municipal operations. Municipal inventories are not calculated or presented in this report, but have been developed or will be developed by individual cities on their own.”

- What is the costs of producing a municipal inventory?

### Page 5-2 Business as Usual Forecast 2020

“Unit of Measure: The unit of measure used throughout this GHG inventory is the metric ton of CO<sub>2</sub> equivalent (MTCO<sub>2</sub>e). This is the international unit that combines the differing impacts of all greenhouse gases into a single unit, by multiplying each emitted gas by its GWP. GWP is the measure of how much a given mass of GHG contributes to global warming. GWP compares the relative warming effect of the GHG in question to CO<sub>2</sub>.”

The footnote for the above forecast states that it is based on United Nations data, “(1). The GWP values used in this report are based on the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report (SAR) and United Nations Framework Convention on Climate Change (UNFCCC)”

United Nations IPCC are flawed; therefore, any forecasts predicated on models from the UN are flawed<sup>1</sup>. Furthermore, scientists authoring IPCC documents have manipulated data in climate change reports<sup>2</sup>. Therefore, the data is flawed.

- Why would Fontana rely on data from the United Nations for a local program?
- Why would Fontana rely on data that is flawed?

## Page 5-3 Inventory Protocols

“ICLEI U.S. Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions (ICLEI–Local Governments for Sustainability USA 2012). This protocol establishes a number of requirements for reporting community GHG emissions.”

- The International Council for Local Environmental Initiatives (ICLEI) is the nongovernmental organization (NGO), who has a contract with the United Nations to implement SD in the United States.
- Why is the city of Fontana relying on a NGO, which uses UN source data for forecasting?
- Is the city now or every been a member of ICLEI?

Page 5-1: “This section presents the overall methods used to prepare the 2008 community GHG emissions inventories. This section discusses the inventory definitions, inventory protocols used, emissions factors, and analysis methods.”

- We challenge all inventory methodology, protocols and factors outlined in Appendix A because they are predicated on flawed dated<sup>2</sup>.

## References

1 U.N. Agenda 21: Sustainable Development in the U.S.A.

1 U.N. Agenda 21: Sustainable Development in California

2 U.N. Agenda 21 & Climate Change: The Consensus Exposed

3 2016 SCAG RTP/SCS, page 8

### Improving Air Quality and Reducing Greenhouse Gases

It is through integrated planning for land use and transportation that the SCAG region, through the initiatives discussed in this section, will strive toward a more sustainable region. The SCAG region must achieve specific federal air quality standards. It also is required by state law to lower regional greenhouse gas emissions. California law requires the region to reduce per capita greenhouse gas emissions in the SCAG region by eight percent by 2020—compared with 2005 levels—and by 13 percent by 2035. The strategies, programs and projects outlined in the 2016 RTP/SCS are projected to result in greenhouse gas emissions reductions in the SCAG region that meet or exceed these targets.

*Comment: This sets up a never ending planning cycle where there is no strategic plan to complete a plan. There is no plan to “win the war” on GHG emission reduction. Under SD, everything is relative and in a state of constant flux. This is by design as it creates the crisis necessary for constant planning based on relative new goals.*

## Preserving Natural Lands

Many natural land areas near the edge of existing urbanized areas do not have plans for conservation and are vulnerable to development pressure. The 2016 RTP/SCS recommends redirecting growth from high value habitat areas to existing urbanized areas. This strategy avoids growth in sensitive habitat areas, builds upon the conservation framework and complements an infill-based approach.

*Comment: This creates priority development areas (PDAs), which constrain populations into tighter areas. Development has nowhere to go but up in the form of high-density development. So, we see resources being constrained under conservation, which creates land rationing, which created higher prices and more congestion.*

## Financing Our Future

To accomplish the ambitious goals of the 2016 RTP/SCS through 2040, SCAG forecasts expenditures of \$556.5 billion—of which \$275.5 billion is budgeted for operations and maintenance of the regional transportation system and another \$246.6 billion is reserved for transportation capital improvements.

Forecasted revenues comprise both existing and several new funding sources that are reasonably expected to be available for the 2016 RTP/SCS, which together total \$556.5 billion. Reasonably available revenues include short term adjustments to state and federal gas excise tax rates and the long-term replacement of gas taxes with mileage-based user fees (or equivalent fuel tax adjustment). These and other categories of funding sources were identified as reasonably available on the basis of their potential for revenue generation, historical precedence and the likelihood of their implementation within the time frame of the Plan.

4 This paper is available for download @ [iagenda21.com](http://iagenda21.com)