

Comment 1 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Michael

Last Name: Rawson

Email Address: mrawson@pilpca.org

Affiliation: The Public Interest Law Project

Subject: Key Economic Questions

Comment:

After the 2/19 working group meeting, I had some other thoughts on ways to frame the key economic questions needed to derive relevant economic factors.

1) Regarding Housing Affordability and Jobs/Housing

Balance:

a. How does housing affordability affect the jobs/housing balance (and the related effectiveness of smart growth housing reducing VMTs)?

b. Do current jobs/housing balance modeling methods account for housing affordability?

c. Is it possible to adjust these models to consider housing affordability relative to job type and job wage levels?

d. Do/can VMT projections relative to jobs/housing balance take into account unemployment rates projections (adjusted to account for those not seeking work)?

2) Regarding Land Use and Redevelopment:

a. Can projected changes in land use patterns resulting from Sustainable Community's Strategies be modeled or assessed in some way?

b. How does the extent and likelihood of redevelopment of existing uses attributable to Sustainable Community's Strategies affect VMT reduction projections and how can this be measured?

c. How would the displacement caused by smart growth housing produced through redevelopment affect the VMT reduction projections?

d. How would the affordability level of redeveloped smart growth housing affect the degree of displacement?

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-02-25 13:44:49

No Duplicates.

Comment 2 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Dan

Last Name: Wayne

Email Address: dwayne@co.shasta.ca.us

Affiliation:

Subject: Shasta Modeling Capabilities for RTAC

Comment:

See attached

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/2-scrtpa_sb_375_related_modeling_capacities.pdf

Original File Name: SCRTPA SB 375 related modeling capacities.pdf

Date and Time Comment Was Submitted: 2009-02-25 14:20:04

No Duplicates.

Comment 3 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: ALAN
Last Name: PISARSKI
Email Address: alanpisarski@alanpisarski.com
Affiliation:

Subject: my recent study in the ITE Journal
Comment:

Mr. Ito:

I have received several suggestions that your group would benefit from my recent policy article in the ITE Journal January edition called:

"The Nexus of Energy, Environment and the Economy: A Win, Win, Win Opportunity"

If you do not have it already I can send along a copy. Regards to Dan Sperling. we often testify together on the hill.

Alan E. Pisarski.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-03-02 08:31:12

No Duplicates.

Comment 4 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Curt
Last Name: Johansen
Email Address: lkimura@arb.ca.gov
Affiliation: Triad Communities

Subject: General Comments for RTAC
Comment:

See attachment, transmitted via email to ARB on 03-10-09.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/9-rtac_letter_with_attachments_3_10_09.pdf

Original File Name: RTAC Letter with attachments 3 10 09.pdf

Date and Time Comment Was Submitted: 2009-03-11 13:15:46

No Duplicates.

Comment 5 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Bob

Last Name: Johnston

Email Address: rajohnston@ucdavis.edu

Affiliation:

Subject: Revised Version of Suggestions for Targets

Comment:

Please see attached powerpoint presentation.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/20-johnston.rtac_talk.09.3.ppt

Original File Name: Johnston.RTAC talk.09.3.ppt

Date and Time Comment Was Submitted: 2009-03-26 13:56:15

No Duplicates.

Comment 6 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Malcolm
Last Name: Gaffney
Email Address: malgaff@gmail.com
Affiliation:

Subject: sb375-rtac-ws
Comment:

Please pass this piece of legislation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-04-03 12:52:01

No Duplicates.

Comment 7 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Dan

Last Name: Wayne

Email Address: dwayne@co.shasta.ca.us

Affiliation: Shasta County RTPA

Subject: RTAC comments

Comment:

Please see attached message which was originally sent as an email to ARB staff

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/24-comments.pdf

Original File Name: Comments.pdf

Date and Time Comment Was Submitted: 2009-04-14 15:07:10

No Duplicates.

Comment 8 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Linda
Last Name: Wheaton
Email Address: Lwheaton@hcd.ca.gov
Affiliation: HCD

Subject: JHB bibliography
Comment:

Doug, et. al.:

Below for your information is the link to HCD's latest update of an electronic bibliography on JHB issues. . . it includes the work done on this issue by the MPOs and others for the Inter-Regional Partnerships (IRP) Program in the earlier part of the decade (link excerpted below). The IRP Program was a forerunner of the Regional Blueprint Program.

Jobs-housing balance resources // Issues related to the spatial relationship between the location of jobs and housing have posed a persistent planning challenge for some time. This bibliography includes the work of researchers and planning practitioners in tackling these issues which are found to defy "one-size-fits-all" prescriptions. Planning for and attaining an adequate supply of housing located within a reasonable commute distance of compatible employment opportunities for the workforce involves complex relationships.

<http://www.hcd.ca.gov/hpd/jobshousing.pdf>

CALIFORNIA'S INTER-REGIONAL PARTNERSHIP PROGRAM: Jobs, housing, and mobility strategies / Wheaton, Linda, ed. -- Sacramento, CA: California Department of Housing and Community Development, 2005, 232 p.

Available full text via the World Wide Web:
<http://www.hcd.ca.gov/hpd/irp/irp112105.pdf>

"This report describes and evaluates the California Inter-Regional Partnership (IRP) Program as of 2004, and also includes a literature review of jobs-housing relationships. The purpose of the IRP Program was to 'encourage state land-use patterns that balance the location of employment-generating uses so that employment-related commuting is minimized,' and to provide a forum for some of the State's most impacted regions to deal collaboratively on issues regarding jobs, housing, and transportation. ...This report includes an overview of the IRP Program, evaluates issues relating to jobs-housing relationships, summarizes lessons from the IRP projects, and includes highlights of the summary reports of each of the eight IRPs funded by the program... The report ddvises there is no 'one size fits all' prescription for these issues; it is necessary to evaluate each context to identify appropriate strategies. ..." (ps. ES-1, 18)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-04-24 13:57:16

No Duplicates.

Comment 9 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Joe
Last Name: Distefano
Email Address: JoeD@calthorpe.com
Affiliation: Calthorpe Associates

Subject: Vision California
Comment:

Vision California Regional Demographic Summary Map transmitted to
ARB via email on April 21, 2009

Attachment: [www.arb.ca.gov/lists/sb375-rtac-ws/27-
vision_ca_regional_demographic_summary_map.pdf](http://www.arb.ca.gov/lists/sb375-rtac-ws/27-vision_ca_regional_demographic_summary_map.pdf)

Original File Name: Vision CA Regional Demographic Summary Map.pdf

Date and Time Comment Was Submitted: 2009-04-27 10:03:08

No Duplicates.

Comment 10 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Dan
Last Name: Sperling
Email Address: dsperling@ucdavis.edu
Affiliation:

Subject: New Brookings Institution Report on Sustainable Transport
Comment:

Brookings Institution Report transmitted to ARB via email on April
18, 2009

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/28-bi_germany_transportation_report.pdf

Original File Name: BI_germany_transportation_report.pdf

Date and Time Comment Was Submitted: 2009-04-27 10:08:44

No Duplicates.

Comment 11 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Garth

Last Name: Hopkins

Email Address: garth.hopkins@dot.ca.gov

Affiliation:

Subject: SB 375 Cost Impacts Study

Comment:

League of California Cities Report transmitted to ARB via email on
April 21, 2009

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/29-sb_375_mpo_cost_report-2-1.pdf

Original File Name: SB 375 MPO Cost Report-2-1.pdf

Date and Time Comment Was Submitted: 2009-04-27 11:36:28

No Duplicates.

Comment 12 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Michael
Last Name: Rawson
Email Address: mrawson@pilpca.org
Affiliation:

Subject: Data-housing affordability
Comment:

Received by ARB staff via email May 20, 2009.

'Lezlie--

Here are some data sources that address housing affordability, income, wages, parking and commute patterns:

Income and Housing Affordability

Out of Reach 2009 (Nat. Low Income Housing Coalition)
<http://www.nlihc.org/oor/oor2009/area.cfm?state=CA>

Housing Affordability Compared to Wage Levels and Commute Distances

Locked Out 2008 (Cal. Budget Project)
http://www.cbp.org/pdfs/2008/080212_LockedoutReport.pdf
See especially:
Table 3.2 (How Long Does It Take to Get to Work) [Analyzing Data from 2006 ACS]
Appendix A: HUD Fair Market Rents
Appendix B: Wages Needed to Afford Fair Market Rents
Tech. Notes, p. 49

Parking and Car Ownership Data for Below Market Rate (BMR) Housing

Parking Requirements and Affordable Housing (Congress for the New Urbanism)
<http://www.cnu.org/node/2241>

Rethinking Residential Parking (Non-Profit Housing Association of Northern California (NPH)(2001)

Commute Patterns of Low Income Persons

Daily Travel By Persons with Low Income (Federal Highway Administration)
<http://nhts.ornl.gov/1995/Doc/LowInc.pdf>

Bureau of Labor Statistics--Vehicle ownership and fuel consumption by income class
<http://www.bls.gov/cex/home.htm>

In addition, several of California's major nonprofit housing developers are now conducting studies of the commute distances and car ownership of their substantial low income tenant populations. Those results should be available in less than a month.

Let me know if you or other staff have questions.

Mike Rawson

Michael Rawson
Public Interest Law Project/
California Affordable Housing Law Project
449 15th Street, Suite 301
Oakland, CA 94612
510-891-9794, ext. 145
Fax-891-9727
www.pilpca.org

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-05-21 07:48:46

No Duplicates.

Comment 13 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Dan

Last Name: Wayne

Email Address: dwayne@shasta.ca.us

Affiliation: Shasta County RTPA

Subject: Mapping of Household Auto GHG Emissions

Comment:

FYI: GIS mapping project illustrating relationship between density, location, and GHG emissions.

<http://htaindex.cnt.org/>

Click on map, then 'Greenhouse Gas Impacts' tab.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-05-29 11:41:22

No Duplicates.

Comment 14 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Ann
Last Name: Chan
Email Address: achan@ccap.org
Affiliation:

Subject: New CCAP Study on Cost-Effectiveness of Smart Growth & Improved Transportation Choices

Comment:

Email message from Ann Chan to ARB staff on June 18, 2009:

'Just wanted to check-in and pass on this latest study. We're still expecting that Steve's 'Growing Wealthier' report will be forthcoming later this summer.

As always, whenever it might be beneficial, we'd be happy to present this type of economic analysis to the RTAC. Just let us know.'

Study Report is attached.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/38-ccap_june_2009_report_on_cost-effective_smart_growth_and_transportation.pdf

Original File Name: CCAP June 2009 Report on Cost-Effective Smart Growth and Transportation.pdf

Date and Time Comment Was Submitted: 2009-06-22 11:13:00

No Duplicates.

Comment 15 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: William

Last Name: Allen

Email Address: bill.allen@laedc.org

Affiliation:

Subject: LA County Economic Development Corporation Comments to RTAC

Comment:

See attached letter received by ARB staff for RTAC via fax on June 22, 2009.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/39-lacedc_comment_6.23.09.pdf

Original File Name: LACEDC Comment 6.23.09.pdf

Date and Time Comment Was Submitted: 2009-06-23 16:37:45

No Duplicates.

Comment 16 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Juan
Last Name: Matute
Email Address: jmatute@ucla.edu
Affiliation: UCLA School of Public Affairs

Subject: RTAC Comment - VMT Brief
Comment:

See attached comment letter received by ARB staff via email June 26, 2009.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/40-vmt_brief_-_ucla_program_on_local_government_climate_action_policies.pdf

Original File Name: VMT Brief - UCLA Program on Local Government Climate Action Policies.pdf

Date and Time Comment Was Submitted: 2009-06-29 11:21:55

No Duplicates.

Comment 17 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Lee

Last Name: Harrington

Email Address: lkimura@arb.ca.gov

Affiliation: Southern California Leadership Council

Subject: SCLC SB 375 Position Paper - Comment to RTAC

Comment:

See attached letter and paper addressed to Mike McKeever and RTAC Members dated July 7, 2009 and received by ARB staff via postmail July 13, 2009.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/57-sclc_comment_for_rtac_7.7.09.pdf

Original File Name: SCLC Comment for RTAC 7.7.09.pdf

Date and Time Comment Was Submitted: 2009-07-13 14:42:46

No Duplicates.

Comment 18 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Barry

Last Name: Wallerstein

Email Address: lkimura@arb.ca.gov

Affiliation: RTAC Member

Subject: Draft Framework for Committee Consideration

Comment:

The attached document was received by ARB staff on July 14 from RTAC member Barry Wallerstein for consideration by the committee.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/61-wallersteindraftframework.pdf

Original File Name: [wallersteindraftframework.pdf](#)

Date and Time Comment Was Submitted: 2009-07-16 16:02:18

No Duplicates.

Comment 19 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Bill

Last Name: Higgins

Email Address: lkimura@arb.ca.gov

Affiliation: League of Cities

Subject: Proposed RTAC Roadmap for July through September

Comment:

The attached document was provided by Bill Higgins, to Regional Targets Advisory Committee (RTAC) Chair Mike McKeever on July 17, 2009, for consideration by the committee.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/63-higginsproposedroadmap.pdf

Original File Name: higginsproposedroadmap.pdf

Date and Time Comment Was Submitted: 2009-07-22 07:55:22

No Duplicates.

Comment 20 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Jerry

Last Name: Walters

Email Address: lkimura@arb.ca.gov

Affiliation: RTAC Member

Subject: Response to Wallerstein Draft Framework

Comment:

The attached document was provided by Jerry Walters, Regional Targets Advisory Committee(RTAC) member, for consideration by the committee.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/64-waltersresponse.pdf

Original File Name: waltersresponse.pdf

Date and Time Comment Was Submitted: 2009-07-22 07:56:56

No Duplicates.

Comment 21 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Gary
Last Name: Gallegos
Email Address: lkimura@arb.ca.gov
Affiliation: SANDAG

Subject: SANDAG's Response to Higgins Proposed RTAC Roadmap
Comment:

The attached document was provided by Gary Gallegos, Executive Director of the San Diego Association of Governments (SANDAG), and Regional Targets Advisory Committee member, on behalf of SANDAG for the RTAC's consideration.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/65-sandagresponsetoroadmap.pdf

Original File Name: sandagresponsetoroadmap.pdf

Date and Time Comment Was Submitted: 2009-07-22 07:58:47

No Duplicates.

Comment 22 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Tom

Last Name: Jordan

Email Address: tom.jordan@valleyair.org

Affiliation: San Joaquin Valley APCD

Subject: Combined San Joaquin Valley Air District and Comments

Comment:

Attached are combined comments, for the Regional Targets Advisory Committee to consider, from the San Joaquin Valley Air Pollution Control District and the San Joaquin Valley Regional Planning Agencies, Directors Committee.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/67-san_joaquin_valley_rtac_comments.pdf

Original File Name: San Joaquin Valley RTAC Comments.pdf

Date and Time Comment Was Submitted: 2009-07-29 09:19:27

No Duplicates.

Comment 23 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Mike

Last Name: Rawson

Email Address: lkimura@arb.ca.gov

Affiliation: RTAC Member

Subject: Rawson Comments to RTAC Re: Social Equity-Affordable Housing
Comment:

The attached document was provided by Mike Rawson, Regional Targets Advisory Committee member, for the RTAC's consideration.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/70-rawsoncomment.pdf

Original File Name: rawsoncomment.pdf

Date and Time Comment Was Submitted: 2009-07-31 11:05:48

No Duplicates.

Comment 24 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Robert

Last Name: Johnston

Email Address: lkimura@arb.ca.gov

Affiliation:

Subject: Ideas for ARB Staff and RTAC on GHG Reduction Metrics, Target Setting, Model Benchmarks

Comment:

The following document was provided by email to ARB staff by Robert Johnston, Emeritus Professor, University of California Davis, for consideration by ARB staff and the RTAC committee.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/71-johnstoncomment.pdf

Original File Name: johnstoncomment.pdf

Date and Time Comment Was Submitted: 2009-08-03 11:03:10

No Duplicates.

Comment 25 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Carolyn

Last Name: Chase

Email Address: cdchase@movesandiego.org

Affiliation: www.movesandiego.org

Subject: Transit Performance Issues and Reduction of VMT

Comment:

Move San Diego is a California 501(c)3 non-profit corporation with a mission to improve the sustainability of San Diego County's transportation network. MoveSD represents a collaboration of community planners, developers, businesses and environmentalists creating common ground to improve the economic and environmental performance of our regional transportation investments and smart growth policies.

We understand that the San Diego region will be the first region statewide to go through the SB375 Sustainable Communities planning process, including the update of our Regional Transportation Plan (RTP) and Regional Housing Needs Assessment.

INTEGRATION = Making the Land Use & Transportation Connections
Since fossil fuel consumption by transportation is known to be the single largest source of California's GHG emissions, accounting for some 41% of emissions, improvement to planning and running our regional transportation networks is critical. While regions are pursuing "smart growth" by adding additional development and redevelopment, the connections between land use planning and transportation performance are lagging behind.

Specifically, our coalition agrees that transit planning performance is the key strategic, economic and environmental investment that is being the most ignored and would like the RTAC to become much more aware and involved in further quantification and integration of transit as critical - and required - to achieve the wealth of benefits sought by Californians in smart growth and climate change policies.

Transit contributions to VMT and emissions reductions

In a recent regional study of GHG emissions sources and policies conducted by the Energy Policy Initiatives Center at the University of San Diego <<http://www.sandiego.edu/epic>>, the policy strategies needed to drive transportation-based GHG emissions downward to achieve State goals were ranked. The top two strategies were changes out of the direct control of the region's governments. However, the third top strategy that the region does have some control over is to reduce VMT (Vehicle Miles Traveled). In turn, having studied the issue over time, we believe the biggest change that allows for the largest number of people to reduce their VMT, other than moving where they live or work which is often unachievable by the vast majority of people, is for drivers to be able to change to transit at least for their work commutes. This would also provide the greatest peak period congestion relief

benefits. Furthermore, we believe that having more drivers change to transit will actually be required for us to meet State goals pursuant to Assembly Bill 32 (AB 32). Therefore, the issue of what allows and attracts people to change from driving to transit is strategically critical.

What will allow a region to reduce VMT?

While our region has adopted a myriad of smart growth policies, and has invested billions in transit projects, ridership has not risen enough to significantly impact either VMT or congestion - distinct from recent peaks in gas prices. Why not? Why don't significant numbers of drivers change to transit?

Market research in the San Diego region has shown that drivers can be divided into six basic market groups, 1/6 will never take transit; 1/6 prefer transit. There are four groups "in the middle" representing 2/3 of drivers who would change to transit, but only if it meets their needs. Those needs can be summed up as: sufficient network connectivity; trip times competitive with driving times; reliable/safe/attractive to use. See more info at: <http://www.sdearthtimes.com/et0408/et0408s5.html>

What is a key barrier to reducing VMT?

We have identified that a key barrier to reducing VMT is lack of a transit network that meets existing drivers' service needs. Transit projects are not currently being designed based on what market research shows drivers need in order to use transit. They are being shaped by a myriad of planning regimes and funding requirements, and not based on the key factors that would attract significant numbers of riders.

We believe that a market-based approach to transit infrastructure and service planning is required to both comply with AB 32's requirement of reducing GHG emissions and achieve smart growth goals - including improving the region's economic competitiveness. Hi-tech and knowledge workers especially hate traffic and are willing to change to transit, but not if it requires significant amounts of additional time. Improving transit performance also has a huge benefit to improving conditions for the poor and disabled.

Objections to policies to reduce VMTs

We have heard some say that improvements in the emissions profiles of cars and trucks will mean we don't have to reduce VMTs. Indeed, the biggest changes out of a region's control are expected to come from manufacturers or through other governmental actions. However, even as emissions profiles of vehicles continue to improve, traffic congestion would still remain as a smart growth challenge and drag on economic performance and quality of life. Better connecting jobs and housing is critical to economic performance. Therefore, a smart, market-based transit system is a requirement to achieve smart growth.

What would such a system look like?

MoveSD searched worldwide for the global best transit planning practices most applicable to our region's land use and transportation growth pattern. We then hired experts to design a transit network based on the market-service principles determined by the market research.

We believe this market-based approach to transportation network planning has important implications for many urban regions, especially those dealing with sprawl, traffic and dispersed

regional job centers.

Our findings determined applying this "FAST Planning" approach (Financially Achievable, Saves Time) could provide significant regional benefits including:

- better target and serve major regional job zones and housing areas
- better support transit-oriented development.
- improves the cost-efficiency of transit investments and transit operations.
- is affordable to build and operate
- increases transit use by attracting significantly more riders
- flexible enough to adapt to future conditions
- measurably improves congestion
- a more consistent approach to developing infrastructure designed to be more attractive

Investing in mass transit is also a job engine AND real estate investment, unlike other potential policies to reduce energy use such as telecommuting.

Impediment to Smart Growth and Climate Change reductions

We feel the biggest impediment to achieving reductions in VMT and related smart growth goals is the lack of any state requirement to provide a minimum standard for transit services in order to qualify as "smart growth" or a "sustainable community" approach. We see planners promoting smart growth, but it is not smart when it is not supported by a sufficient transit network to support the increased densities.

Investments in transit that do not meet user market-based service needs or that do not sufficiently improve the network connectivity of regional job centers and housing density, merely result in more congestion and do not offer significant emissions reductions benefits.

Yes, smart growth can offer a wealth of benefits. But it is only as smart as its weakest link. We find, right now, that weakest link, is indeed the design and performance of regional transit networks. Without requiring transit performance improvements, there is a wealth of evidence that we will not achieve the benefits of smart growth; indeed, adding density without having sufficient transit connectivity is exactly what has happened in our region. Additionally, state cuts to transit have reduced transit services to many "Transit Oriented Development" locations. So right now, it becomes a formula for more congestion and more emissions and more parking - the exact opposite of what we need from smart growth.

Note some statistics from our existing RTP:

- 2006 vehicle miles traveled (VMT) is 74.7 million. Under this RTP, VMT would be 113.5. (DEIR at 7-3, table 7.0-1). This is a 38.8 million (34%) increase in VMT.
- The total number of freeway lane miles would increase by over 800 from existing conditions. RTP DEIR at 7-12.
- The transportation improvements under the proposed RTP would increase gasoline consumption by approximately 505 million gallons per year or 31.26 percent relative to existing (2006) conditions.
- Total diesel consumption would increase by 48.7 million gallons

or 25.00 percent relative to existing conditions. DEIR at 4.7-23.
- Annual greenhouse gas ("GHG") emissions under the 2007 RTP would exceed existing levels by the substantial margin of about 31 percent or 5.3 million tons of CO2 per year in 2030. DEIR at 4.7-34. The document finds that this increase in GHG emissions would contribute to the exacerbation of climate change and concludes this impact to be significant. Id. at 4.7-34 and 4.7-38.

Therefore, we urge you to make the connection in this most strategic location - the performance of our transit networks as necessary to achieve both climate change reduction and indeed all goals related to smart growth and sustainability.

To view our presentation: Improving transit performance by applying global best practices
<http://movesd.org/Downloads/FASTonline%20version%202.4.htm>

You may also download a 2-page summary of FAST Planning from our Programs page:
<http://movesd.org/programs.html>

Thank you for the opportunity to comment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-08-04 08:40:56

No Duplicates.

Comment 26 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: brienneguz
Last Name: brienneguz
Email Address: brienneguzma@gmail.com
Affiliation: brienneguz

Subject: kyoto agricultural
Comment:

trends sea climatic sea america

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-08-12 15:10:30

No Duplicates.

Comment 27 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Sabrina

Last Name: Means

Email Address: sabrina@caltransit.org

Affiliation: California Transit Association

Subject: Comments from the California Transit Association

Comment:

The California Transit Association respectfully submits the attached comments to the RTAC for your consideration.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/76-california_transit_association_comments_to_rtac_8-12-09.doc

Original File Name: California Transit Association comments to RTAC- 8-12-09.doc

Date and Time Comment Was Submitted: 2009-08-12 16:03:22

No Duplicates.

Comment 28 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Christine

Last Name: Aure

Email Address: lkimura@arb.ca.gov

Affiliation: Urban Land Institute - Los Angeles Dist.

Subject: Comments presented to RTAC at the August 5 Meeting

Comment:

Attached are the comment letter and document provided to Regional Targets Advisory Committee members during the public comment period at their August 5, 2009 meeting.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/77-ulilacomments.zip

Original File Name: ULILAComments.zip

Date and Time Comment Was Submitted: 2009-08-13 07:50:03

No Duplicates.

Comment 29 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Pete

Last Name: Parkinson

Email Address: lkimura@arb.ca.gov

Affiliation: RTAC Member

Subject: Comments on Social Equity Discussion

Comment:

Attached is a document provided by Pete Parkinson, Regional Targets Advisory Committee member, for consideration by the committee.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/78-parkinsoncomment.pdf

Original File Name: parkinsoncomment.pdf

Date and Time Comment Was Submitted: 2009-08-13 13:32:16

No Duplicates.

Comment 30 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Julie
Last Name: Snyder
Email Address: jsnyder@housingca.org
Affiliation: Housing California

Subject: Comments for RTAC August 18, 2009, meeting
Comment:

Please see the attached letter.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/79-coalition_letter_to_rtac__8-10-09.doc

Original File Name: Coalition letter to RTAC, 8-10-09.doc

Date and Time Comment Was Submitted: 2009-08-13 16:20:17

No Duplicates.

Comment 31 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Barry
Last Name: Wallerstein
Email Address: bwallerstein@aqmd.gov
Affiliation: South Coast AQMD

Subject: SB 375 Implementation Process
Comment:

Please see the attached memo to the RTAC Membership and Interested Parties re SB 375 Implementation Process

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/81-rtac_membership_re_sb_375_implementation_process.pdf

Original File Name: RTAC Membership re SB 375 Implementation Process.pdf

Date and Time Comment Was Submitted: 2009-08-14 17:10:37

No Duplicates.

Comment 32 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Barry

Last Name: Wallerstein

Email Address: bwallerstein@aqmd.gov

Affiliation: South Coast AQMD

Subject: Emission Reduction by Order of Implementation

Comment:

Please see the attached memo to the RTAC Membership and Interested Parties re Emission Reduction by Order of Implementation.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/82-rtac_membership_re_emission_reduction_by_order_of_implementation.pdf

Original File Name: RTAC Membership re Emission Reduction by Order of Implementation.pdf

Date and Time Comment Was Submitted: 2009-08-14 17:12:38

No Duplicates.

Comment 33 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Linda

Last Name: Wheaton

Email Address: lkimura@arb.ca.gov

Affiliation: CA Dept. of Housing and Community Dev.

Subject: Research re: affordable housing and greenhouse gas reductions

Comment:

The attached document was provided by Linda Wheaton, of the California Department of Housing and Community Development, for consideration by the committee.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/83-hcdcomment.pdf

Original File Name: hcdcomment.pdf

Date and Time Comment Was Submitted: 2009-08-17 16:22:51

No Duplicates.

Comment 34 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Bill

Last Name: Higgins

Email Address: lkimura@arb.ca.gov

Affiliation: League of California Cities

Subject: Housing Equities in SB 375

Comment:

The attached document was provided by Bill Higgins, of the League of California Cities, for consideration by the committee.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/84-higginscomment.pdf

Original File Name: [higginscomment.pdf](#)

Date and Time Comment Was Submitted: 2009-08-17 16:27:01

No Duplicates.

Comment 35 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Barry

Last Name: Wallerstein

Email Address: bwallerstein@aqmd.gov

Affiliation: South Coast AQMD

Subject: CART RTAC

Comment:

Please see the attached PowerPoint presentation from Barry Wallerstein, "RTAC Discussion of Point System Approach to Target Setting."

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/85-brw_-_081809.ppt

Original File Name: BRW - 081809.ppt

Date and Time Comment Was Submitted: 2009-08-18 07:53:46

No Duplicates.

Comment 36 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Connie
Last Name: Galambos Malloy
Email Address: connie@urbanhabitat.org
Affiliation: Urban Habitat

Subject: SCS - Housing Affordability
Comment:

August 20, 2009

Chairman Mike McKeever and members
Regional Targets Advisory Committee
California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Dear Chairman McKeever and members of the RTAC:

I am writing to you representing low income communities and communities of color in the San Francisco Bay Area who are active around environmental issues including but not limited to GHG reductions. We are concerned that the state's greenhouse gas reduction targets could negatively impact the development community's ability to offer affordable rents and mortgages to all Californians and urge you to adopt recommendations that achieve significant reductions in greenhouse gas emissions and promote the development of affordable, compact homes.

Multiple GHG reduction benefits will accrue if a variety of housing types and affordability levels are part of the development pattern in every Sustainable Communities Strategy. Two crucial pieces of this include optimizing the GHG reductions achieved by an improved jobs-housing balance, and increasing the GHG reductions achieved by new transit-oriented developments.

To ensure we meet not both social equity and environmental goals, Urban Habitat supports Mike Rawson's July 31, 2009, proposal to incorporate the following factors and methodologies:

- Quantification of the effect of housing affordability on GHG emissions (including affordability in relation to wage levels);
- Projections, by region, of the relative increase or decrease in homes affordable to households at various income levels (particularly the availability of below-market-rate homes) and attendant effect on GHG emissions over the target period;
- Crediting regions that exceed the housing affordability projections with quantified GHG reductions; and
- Analysis of the potential and actual displacement from compacted development, quantification of the effect of displacement on GHG emissions, and GHG reduction credit to regions that prevent or

mitigate displacement.

Additionally, Metropolitan Planning Organizations need a modeling tool to measure the impacts of potential SCS development patterns on their region's land prices and home affordability. Housing California is working with an MPO to determine how PECAS could be adapted to provide this information to policymakers. With the information, an MPO can more accurately assess whether its forecasted development pattern is realistic and will achieve the region's GHG reduction target.

It is increasingly clear that cleaner air, healthier families, vibrant communities, and more affordable homes can be achieved through improved land use planning. In solidarity with such networks as Housing California, we urge you to adopt our recommendations to spread these benefits to Californians at all income levels.

Sincerely,

Connie Galambos Malloy, Director of Programs
Urban Habitat
Oakland, CA

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-08-20 12:11:38

No Duplicates.

Comment 37 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Julia

Last Name: Gardiner

Email Address: jgardiner@tnc.org

Affiliation: The Nature Conservancy

Subject: THE Nature Conservancy recommendations for RTAC report
Comment:

The Nature Conservancy respectfully submits the attached recommendations for the RTAC report. Thank you for your consideration.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/89-the_nature_conservancy_rtac_letter_8.25.09.doc

Original File Name: The Nature Conservancy RTAC letter 8.25.09.doc

Date and Time Comment Was Submitted: 2009-08-25 13:58:13

No Duplicates.

Comment 38 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Julia

Last Name: Gardiner

Email Address: lkimura@arb.ca.gov

Affiliation: The Nature Conservancy

Subject: Comment Letter to RTAC Committee

Comment:

Attached is a comment letter to the RTAC committee received by ARB staff via email on 8/25/09.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/90-the_nature_conservancy_rtac_letter_8_25_09.doc

Original File Name: The Nature Conservancy RTAC letter 8 25 09.doc

Date and Time Comment Was Submitted: 2009-08-26 09:00:49

No Duplicates.

Comment 39 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Doran

Last Name: Barnes

Email Address: dbarnes@foothilltransit.org

Affiliation: Foothill Transit

Subject: Comments to RTAC

Comment:

Attached please find Foothill Transit's key factors for your consideration.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/91-foothill_transit_comments_to_rtac__final.docx

Original File Name: Foothill Transit Comments to RTAC _FINAL.docx

Date and Time Comment Was Submitted: 2009-08-27 07:32:25

No Duplicates.

Comment 40 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Bob

Last Name: Johnston

Email Address: rajohnston@ucdavis.edu

Affiliation: UC Davis

Subject: Recommendations for Planning Methods for Target Setting and for SCS/APS Planning
Comment:

Please see the attached Word document.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/92-comments_to_the_rtac_for_its_meeting_on_sept-2.doc

Original File Name: Comments to the RTAC for Its Meeting on Sept-2.doc

Date and Time Comment Was Submitted: 2009-08-28 17:15:41

No Duplicates.

Comment 41 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Bob

Last Name: Johnston

Email Address: rajohnston@ucdavis.edu

Affiliation: UC Davis

Subject: Comments on RTAC Working Draft Rept. of 8/28/09

Comment:

RTAC Members and ARB Staff:

I can't comment on the newer marked-up draft, as I can't get the copy I received to print or to edit. I'll comment on the next round that is put on the web site.

I'll keep it brief:

1. A standard set of performance indicators is needed and it must include VMT and on-road GHGs by vehicle type and time of day, so reviewers can check the outputs for reasonableness. And so we can all compare outputs across MPOs. Without a standard set of indicators, the whole SB 375 process is worthless. We also need mode shares, VHT, and other travel indicators. And land use indicators for new uses, such as density and mix and access to transit.
2. A standard set of Alternatives must also be required, again in order for reviewers to determine the reasonableness of the SCS and APS scenarios. I suggested a set in my two previous comments (No Action, Strong Transit, Strong Transit Plus Supporting Land Use, Strong Transit Plus Supporting Land Use Plus Pricing of Parking and/or VMT). These will be defined somewhat differently by each MPO, but they will allow comparison across scenarios within an MPO and broad comparison across MPOs. Other alternatives can be done, of course, as the MPOs wish. These standard alternatives also serve as a useful sensitivity test of each MPO's models. It is very difficult to review a modeling exercise if the alternatives are muddled, that is, have various mixtures of policies and no pure scenarios. The current CTC modeling guidelines urge sensitivity testing, along these lines.
3. The Pavely and the LCFS policies' effects should be kept out of the SB 375 analyses, to the extent possible, by focusing on VMT and on-road GHGs and by presenting the GHG projections with a standard fleet that doesn't change from the Base Year, so we can see the effects of SB 375 alone. Only in this way, can one evaluate the progress over time of the SB 375 policies and judge the validity of the modeling. One can also run the EMFAC model with the projected (changing) future fleets to get the real GHG projections.
4. I would make the metric: Change in GHGs/(pop.+ empl.). One can then break this metric into two, with denominators of New Growth in Pop. and Empl. and of Existing Pop. and Empl. Both new population and new employment can be regulated so that they are built at higher densities. So, growth in both of these variables jointly can

be used in setting the GHG-reduction targets. If you only use growth in population, you will not be able to fairly handle MPOs where employment grows much more rapidly than population. Trips in models begin at Households (pop.) and end at Employment. Both activities are equally responsible for trip generation. Both are necessary in a travel model, to get a trip. Both are equally important in the real world, too.

5. I would not allow the SST/BMP approach to be used in final MPO SCS or APS modeling, except for small MPOs without travel models. This approach will not be as accurate as running a travel model and doing post processing with empirically derived spreadsheets, applied to the local travel data. And it cannot be checked for reasonableness, except in a very general way.

BMPs, though, should be identified by each Air District that covers one or more of the SB 375 MPOs and adopted, as is now done with air pollution BMPs. Please explicitly recommend to the ARB that the air districts have this supplementary role in implementing this statute.

Thank you for your consideration of these ideas. I have reviewed many MPO modeling exercises and wish to make this process workable.

Bob Johnston, Professor
UC Davis

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-09-07 21:25:35

No Duplicates.

Comment 42 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Julia
Last Name: Gardiner
Email Address: jgardiner@tnc.org
Affiliation: The Nature Conservancy

Subject: TNC redline comments to RTAC draft report
Comment:

Dear RTAC members and CARB staff,

The Nature Conservancy respectfully submits the attached redline edits to the RTAC's draft report dated 8.28.09. Thank you for your important work pulling this report together and for your consideration of our comments.

In summary, TNC is pleased that the preservation of natural lands is included as one of the co-benefits of compact development. However, in order to optimize GHG emissions reductions across sectors and preserve vital ecological services we request that the RTAC report explicitly recognizes the impact land use decisions have on additional GHG emissions and reductions from forests and natural lands by adding the insert below to the "Co-benefits of Sustainable Communities Strategies" section on page 41 of the report.

TNC also recommends that biological emissions and reductions and other co-benefits be included as a factor in ARB's target setting process (p8), and natural land preservation should be included as a performance measure (p44). Lastly, existing tools allowing improved quantification of co-benefits should be used to enhance the models (p45).

Please contact me with questions or for additional information.

Thank you.
Julia Gardiner

Insert in August 28, 2009 Draft RTAC Report (p.41)

Ecological benefits and Biological GHG emissions reduction
Optimization of GHG Emissions Reductions Across Sectors - Compact development that minimizes development pressure on intact forests and natural lands reduces additional GHG emissions associated with disturbance and conversion of these lands, preserves their ability to continue to sequester carbon dioxide and maintains their vital climate regulation function.
Additional Co-Benefits- land use patterns that preserve remaining forests and other natural lands allows them to continue to provide a full suite of critical benefits to human and natural communities including the protection of air and water quality, recreation and fish and wildlife habitat.
Help Human Communities Adapt to Climate Change - Compact development fosters the protection of natural ecosystem functions, including natural infrastructure such as wetlands and coastal

vegetation which provide a cost effective alternative to built structures to buffer human communities from the impacts of the more frequent extreme weather events such as floodwaters or storms, that are the result of a changed climate.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/96-draft_rtac_report_tnc_redline_recommendations_9.8.09.doc

Original File Name: Draft RTAC Report_TNC redline recommendations 9.8.09.doc

Date and Time Comment Was Submitted: 2009-09-08 13:45:56

No Duplicates.

Comment 43 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Julie
Last Name: Snyder
Email Address: jsnyder@housingca.org
Affiliation: Housing California

Subject: Comments on second RTAC draft report
Comment:

Please see Housing California's comments and suggestions in the attachment.

Julie Snyder
Policy Director
Housing California

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/97-2nd_draft_rtac_report_with_housing_california_comments.doc

Original File Name: 2nd Draft RTAC Report_with Housing California comments.doc

Date and Time Comment Was Submitted: 2009-09-08 16:15:01

No Duplicates.

Comment 44 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Sabrina

Last Name: Means

Email Address: sabrina@caltransit.org

Affiliation: California Transit Association

Subject: Comments on draft RTAC report

Comment:

Please see the attached comments from the California Transit Association. Thank you.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/98-california_transit_association_comments_to_rtac_9-8-09.doc

Original File Name: California Transit Association comments to RTAC- 9-8-09.doc

Date and Time Comment Was Submitted: 2009-09-08 16:50:14

No Duplicates.

Comment 45 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Autumn
Last Name: Bernstein
Email Address: autumn@climateplan.org
Affiliation: ClimatePlan

Subject: ClimatePlan comments on draft RTAC report
Comment:

Please find our attached comments on the draft RTAC report.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/99-climateplan_comments_on_rtac_report_sept_8.pdf

Original File Name: ClimatePlan comments on RTAC report Sept 8.pdf

Date and Time Comment Was Submitted: 2009-09-08 18:00:40

No Duplicates.

Comment 46 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Matt

Last Name: Vander Sluis

Email Address: mvander@pcl.org

Affiliation: Planning and Conservation League

Subject: Comments on draft RTAC report

Comment:

The following comments refer to the draft RTAC report.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/100-pcl_letter_to_rtac_9_8_09.pdf

Original File Name: PCL Letter to RTAC 9_8_09.pdf

Date and Time Comment Was Submitted: 2009-09-08 23:10:58

No Duplicates.

Comment 47 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Bonnie

Last Name: Holmes-Gen

Email Address: lkimura@arb.ca.gov

Affiliation: American Lung Association CA

Subject: Comments to RTAC on Aug 28 Working Draft

Comment:

Attached are comments for the RTAC on its Aug 28 Working Draft Report, received via email from the American Lung Association California.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/102-alac_082809.pdf

Original File Name: alac 082809.pdf

Date and Time Comment Was Submitted: 2009-09-09 11:14:12

No Duplicates.

Comment 48 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Ann

Last Name: Chan

Email Address: lkimura@arb.ca.gov

Affiliation: Center for Clean Air Policy

Subject: Comments to RTAC on Aug 28 Working Draft

Comment:

Attached are comments for the RTAC on its Aug 28 Working Draft Report, received via email from the Center for Clean Air Policy.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/103-ccap_082809.pdf

Original File Name: ccap 082809.pdf

Date and Time Comment Was Submitted: 2009-09-09 11:15:08

No Duplicates.

Comment 49 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Joshua

Last Name: Shaw

Email Address: lkimura@arb.ca.gov

Affiliation: California Transit Association

Subject: Comments to RTAC on Aug 28 Working Draft

Comment:

Attached are comments for the RTAC on its Aug 28 Working Draft Report, received via email from the California Transit Agency.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/104-cta_082809.pdf

Original File Name: cta_082809.pdf

Date and Time Comment Was Submitted: 2009-09-09 11:15:51

No Duplicates.

Comment 50 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Autumn

Last Name: Bernstein

Email Address: lkimura@arb.ca.gov

Affiliation: ClimatePlan

Subject: Comments to RTAC on Sept 3 Working Draft

Comment:

Attached are comments for the RTAC on its Sept 3 Working Draft Report, received via email from ClimatePlan.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/105-climateplan9309.pdf

Original File Name: climateplan9309.pdf

Date and Time Comment Was Submitted: 2009-09-09 11:39:53

No Duplicates.

Comment 51 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Julie

Last Name: Snyder

Email Address: lkimura@arb.ca.gov

Affiliation: Housing California

Subject: Comments to RTAC on Sept 3 Working Draft

Comment:

Attached are comments for the RTAC on its Sept 3 Working Draft Report, received via email from Housing California.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/106-housingca9309.pdf

Original File Name: housingca9309.pdf

Date and Time Comment Was Submitted: 2009-09-09 11:40:59

No Duplicates.

Comment 52 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Will

Last Name: Kempton

Email Address: lkimura@arb.ca.gov

Affiliation: Orange County Transportation Authority

Subject: Comments to RTAC on Sept 3 Working Draft

Comment:

Attached are comments for the RTAC on its Sept 3 Working Draft Report, received via email from the Orange County Transportation Authority.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/107-octa9309.pdf

Original File Name: octa9309.pdf

Date and Time Comment Was Submitted: 2009-09-09 11:42:46

No Duplicates.

Comment 53 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Keith

Last Name: Roberts

Email Address: keitheroberts@aol.com

Affiliation:

Subject: local government incentives/compensation

Comment:

1. Is there a framework available of what a good Sustainable Communities Strategy (SCS) would look like?

2. Is there any information available about how an SCS will be "graded", who will "grade" the SCS, and how the "grading" will translate into: (1) transportation funding incentive and (2) CEQA streamlining?

3. Local governments can help the State implement approximately half of the 73 identified scoping plan measures. See attached document (Appendix B) under separate cover for a partial compendium of over 300 projects and programs that local jurisdictions might choose to undertake to meet their voluntary target. RTAC is addressing scoping plan item #47, yet this measure comprises $\frac{1}{4}$ to $\frac{1}{3}$ of what a local jurisdiction might consider implementing in an SCS to meet its voluntary target. Will non-SB375 compliant programs that are part of an SCS be rewarded under the transportation incentives mechanism of SB375? Playing devil's advocate, why would the following SB375 non-compliant programs be implemented by a local government:

- Why would a local government care to improve the energy efficiency of new or existing building stock within its city limits?

- Why would a local government care to try and achieve zero waste?

- Why would a local government care about distributed generation or increasing the use of renewable power within its boundaries?

- Why would a local government care to improve awareness of its businesses, citizens and staff?

4. Can CARB identify the proposed incentive/compensation measures that are being considered to help local governments achieve their voluntary targets. Measures that I've seen mentioned over the last year or so are:

- Transportation funding incentives and CEQA streamlining under SB375

- Proposed public goods charge (PGC) on water (scoping plan item #32)

- A year or so ago Build It Green had a proposal before the CPUC to use electric/gas PGC's to reward local governments for energy efficient new construction and for residential/ commercial energy conservation ordinances (RECO/CECO) development and implementation.

I think the proposal died, but could be a good local jurisdiction incentive

- ARRA grants might be able to help start a program, but won't

keep it operational over time... long-term incentive/compensation structure is needed.

- Something that might come out of cap-and-trade

5. I'd like to recommend that CARB put together a working group on local government incentives. Local jurisdictions operate under such thin margins that they need to be compensated for the work that they do to assist in meeting their voluntary targets. Other reasons for having a local government incentives group might include:

- Regulation is good to identify a "floor" that a local government needs to achieve (e.g. AB939's 50% landfill diversion); but incentives/compensation need to be provided for local jurisdictions that want to reach for the "ceiling" of what is achievable (e.g. zero waste).
- CARB should consider addressing local government sustainability improvement in a holistic fashion; the above are measures that address several aspects with piecemeal incentives, which are admittedly the best short-term solution. Appendix B does provide a revenue-neutral concept for addressing the above in a more holistic fashion (see rows 190 to 238 for 2 brainstorming options- one related to distribution of sales tax, the other related to distribution of property taxes).

6. CARB should consider being part of the development process for the ICLEI/USGBC Stars Community Index. This is known as LEED for Cities by some. The co-development of indicators by CARB/ICLEI might benefit both organizations.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-09-09 22:38:03

No Duplicates.

Comment 54 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Michael

Last Name: Bailey

Email Address: michaelebailey@cox.net

Affiliation: People First, California, Orange County

Subject: Working Draft Report, Sept. 9, 2009

Comment:

This Report has a lot of good proposals in it for implementing the reductions in greenhouse gases from vehicles--cars and light trucks. The critical points are the creation of the Best Management Practices and the inclusion of all levels of government, business, and the public in the process of creating and implementing the targets. It will be important to seek out federal grant money to help implement these proposals especially since transit will play a critical part but state funding for it has been eliminated. The idea of smart communities where a person can live close to where they work by easy bus ride, walking or biking will be essential to reducing use of cars and light duty trucks and so substantially reducing greenhouse gas and other forms of air pollution. And both the U.S. DOT, and HUD have grants to fund for this type of development. There is already one city development plan similar to what is being proposed in this report. The City of Anaheim is proposing redevelopment of its Platinum Triangle--the area that includes Angles Stadium, the Arena where the Ducks Hockey Team plays, and Disneyland beginning with the new Metrolink Station that is getting ready to start construction and including a monorail system, housing including some affordable housing, and new commercial area. It also is important that alternative fuels be taken into account to replace gasoline and diesel. The all-electric car is now a reality along with electric hybrid cars; and the hydrogen powered car is also a reality. Incentives should be put in place that encourage people to switch to cleaner fuels. Leaving their cars at home and switch to transit could be done by adding more toll lanes to freeways as one incentive. Thank you and best wishes, Michael E. Bailey, 25801 Marguerite Parkway, No. 103, Mission Viejo, CA 92692.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-09-13 00:09:41

No Duplicates.

Comment 55 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Julie
Last Name: Snyder
Email Address: jsnyder@housingca.org
Affiliation: Housing California

Subject: Comments on Sept. 9, 2009, draft RTAC report
Comment:

Please see attached comments from Housing California.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/114-3rd_draft_rtac_report_with_housing_california_comments__9-14-09.doc

Original File Name: 3rd Draft RTAC Report_with Housing California comments, 9-14-09.doc

Date and Time Comment Was Submitted: 2009-09-14 16:45:50

No Duplicates.

Comment 56 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Val

Last Name: Menotti

Email Address: VMenott@bart.gov

Affiliation: San Francisco Bay Area Rapid Transit

Subject: RTAC Draft Report (version Sept. 9, 2009)

Comment:

Thank you for your consideration.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/115-rtac_sept_9_working_draft_-_bart_comments_090914.pdf

Original File Name: RTAC Sept 9 Working Draft - BART Comments 090914.pdf

Date and Time Comment Was Submitted: 2009-09-14 18:01:43

No Duplicates.

Comment 57 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Steve

Last Name: Raney

Email Address: cities21@cities21.org

Affiliation: Cities21

Subject: Sept 9 draft: adequate jrnly to work data

Comment:

Kudos for the Sept 9 draft reports appendix section on adequate data collection. Attached is a proposal for much better journey to work data collection. By the Sept 9 definition, current journey to work data is inadequate. Proposed is adequate journey to work data (reliably, comprehensively, and consistently collected) that is appropriate to policy.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/116-journey2workdata.pdf

Original File Name: journey2workData.pdf

Date and Time Comment Was Submitted: 2009-09-14 22:22:35

No Duplicates.

Comment 58 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Steve

Last Name: Raney

Email Address: cities21@cities21.org

Affiliation: Cities21

Subject: Sept 9 draft: education/outreach

Comment:

The proposed "positive spin" approach to green behavior change (and to convincing voters to allow unpopular climate protection measures such as large gas tax increases) runs the risk of being perceived as manipulative. Further, the "positive spin" approach has not been shown to be effective.

The education and outreach strategy should be based on expert work from the fields of behavioral psychology, behavioral economics, and persuasive technologies.

1. A large CA voting majority favors low gas prices and low parking prices. We have seen presidential candidates famously promising (pandering) to keep gas prices low while simultaneously promising to protect the climate. Politicians understand the electorate and "wisely" refuse to ask for individual sacrifice.

2. A large CA voting majority favors NIMBY land use policies over regional smart growth.

Items 1 and 2 represent "Tragedy of the Commons" (TOC) issues. With the TOC, the self-interested majority favors a climate-harming policy because of perverse individual incentives. "If only I change, I'm worse off; if we all change, we're all better off ... hence, I won't change."

Behavioral experts should be called upon to develop a more effective education/outreach program to address the TOC issues that we face. Quite probably the outreach program will need to matter-of-factly teach voters about the TOC and then appeal to long-term over short-term optimization in a non-manipulative manner.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-09-14 22:39:06

No Duplicates.

Comment 59 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Robert

Last Name: Ball

Email Address: lkimura@arb.ca.gov

Affiliation: Kern Council of Governments

Subject: RTAC comment from Kern COG - Current Base Year vs. Future Base Year Comparison for Targets

Comment:

The comments below were received by ARB staff via email on Sept. 15, 2009:

Issue on Percapita Targets - (current base year comparison vs. future base year comparison)

According to the RTAC's July release of summary data from the transportation models, the statewide weighted average of CO2 percapita from cars and light trucks will increase by .3 pounds per person between each model's base year and 2035 statewide. The SJV MPOs weighted average increase is 1.1 pounds percapita (Merced 3.4, Kern 3.0, Tulare 1.1, Fresno .8, StanCOG .6, Madera .2, SJCOG -.6, Kings -.7).

It is conceivable that some MPOs may not be able show any reduction from their current base year (2010 for the Valley MPOs). Fast growth MPOs lacking transit infrastructure, and with most new housing on the periphery of major urban centers, will likely have the greatest difficulty showing a reduction. ARB has indicated that a region that doesn't show a uniform percent reduction in percapita CO2 may be allowed a lower rate of reduction than the average statewide. No one on the RTAC has discussed what happens if the percapita CO2 still shows an increase between 2010 and 2035 eventhough it is a lower rate of increase.

An alternative approach discussed during the RTAC was the use of a future year comparison. SB375 allows a future year "business as usual" comparison with an SCS scenario based on latest planning assumptions. This would allow regions to take credit for net reductions in CO2 eventhough they have a net increase in percapita VMT and GHG. The goal of SB375 is to demonstrate reductions in CO2, not force every region to to have the same percapita VMT. This issue may force some regions into having to do an APS, a concern raised by some of the RTAC members.

Regions that are unable to show a reduction should be allowed to use a future "business-as-usual" base year comparison to their SCS scenario.

Attached is a copy of the summary data sheet from the MPOs using data from the last approved conformity. CO2 percapita is found on line 193.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/119-rtac_mpo_scenario_data_w_added_variables_kern071709b.xls

Original File Name: rtac_mpo scenario data_w added variables_Kern071709b.xls

Date and Time Comment Was Submitted: 2009-09-15 16:47:48

No Duplicates.

Comment 60 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Lee

Last Name: Harrington

Email Address: lkimura@arb.ca.gov

Affiliation: SCLC - SCAG - GLUE

Subject: Comment Letter to RTAC Committee

Comment:

The attached are comments from the Southern California Leadership Council, Southern California Association of Governments, and the Global Land Use and Economic Council.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/120-sclc_comments.zip

Original File Name: SCLC Comments.zip

Date and Time Comment Was Submitted: 2009-09-15 17:17:35

No Duplicates.

Comment 61 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Pete

Last Name: Montgomery

Email Address: lkimura@arb.ca.gov

Affiliation: California Building Industry Association

Subject: Preliminary Results of CBIA Study of Recession Impacts on Housing-Related GHG Reduction

Comment:

See attached comment letter received by ARB staff 9/15/09 via email.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/121-cbia_rtac_submittal__2__2_.doc

Original File Name: CBIA RTAC submittal (2) (2).doc

Date and Time Comment Was Submitted: 2009-09-15 17:36:09

No Duplicates.

Comment 62 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Richard

Last Name: Lyon

Email Address: rlyon@cbia.org

Affiliation:

Subject: RTAC submittal

Comment:

Thank you

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/122-rtac_ghg_vmt_pp.ppt_1.ppt

Original File Name: RTAC GHG VMT PP.ppt 1.ppt

Date and Time Comment Was Submitted: 2009-09-15 17:46:17

No Duplicates.

Comment 63 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Richard

Last Name: Lyon

Email Address: rlyon@cbia.org

Affiliation:

Subject: RTAC submittal

Comment:

Thank you

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/123-cbia_rtac_submittal__2_.doc

Original File Name: CBIA RTAC submittal (2).doc

Date and Time Comment Was Submitted: 2009-09-15 17:55:12

No Duplicates.

Comment 64 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Kristine

Last Name: Murray

Email Address: lkimura@arb.ca.gov

Affiliation: Orange County Transportation Authority

Subject: OCTA Comments on Sept 9 Working Draft Report

Comment:

See attached comments for the Committee regarding its Sept 9 Working Draft Report.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/126-octa_edits.pdf

Original File Name: octa edits.pdf

Date and Time Comment Was Submitted: 2009-09-21 13:29:32

No Duplicates.

Comment 65 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Bruce

Last Name: Abanathie

Email Address: babanathie@hotmail.com

Affiliation: private citizen

Subject: Green House Target Setting

Comment:

The text of SB 375 requires a "jobs-housing balance". The RTAC seems to have modified that requirement to a phrase that they coin as a "jobs housing fit". This is not the same. We in the Central Valley have been waiting three plus decades for the (SF)Bay Area to take responsibility for the housing of their population. The commuter has brought many negative effects to the Valley in the form of increased crime rates, gang violence, housing prices that the Valley worker cannot afford, as well as a significant amount of the GHG attributable to the Valley - if not attributable to the commuter themselves then by the domino effect of the commuter forcing further commutes by local workers. I recommend that in the process of setting targets for the reduction of GHG that the phenomena of the Bay Area commuter rest on the shoulders of the source of those emissions - the counties that refuse to provide necessary housing. A 50/50 split is not the answer. If any county does not meet the necessary "jobs-housing balance" they should receive penalties in the same character as the counties that have made prior GHG improvements receive credits. This recommendation should be shared with the HCD, who have for years also ignored the jobs-housing imbalance caused not only by the commuter, but by their own methods of setting the RHNA based on prior housing rather than balance.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-11-02 13:36:54

No Duplicates.

Comment 66 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Tom

Last Name: Scott

Email Address: sdhfexec@housingsandiego.org

Affiliation: San Diego Housing Federation

Subject: RTAC Report

Comment:

Please see attached letter from the San Diego Housing Federation.

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/142-rtacsupport.doc

Original File Name: RTACSupport.doc

Date and Time Comment Was Submitted: 2009-11-04 11:25:54

No Duplicates.

Comment 67 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: John

Last Name: Mandeville

Email Address: jmandeville@slocity.org

Affiliation: City of San Luis Obispo

Subject: Final RTAC Recommendations Report

Comment:

The document does not have a date on the cover or the first few pages. Because the content contains statements such as: "over the next four to six months", a date for the report is important.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2009-12-08 12:15:51

No Duplicates.

Comment 68 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: Dante

Last Name: DeAmicis

Email Address: dante95422@hotmail.com

Affiliation:

Subject: Bottom up solutions

Comment:

Try as I might I cannot seem to find much overlap between the top down techno centered approach and the bottom up-permaculture-living lightly crowd. It seems obvious that any long term change will come from the people who are willing to make changes in their lives and communities right now. That being the case, there cannot be a more cost effective approach than removing the blocks at the local level that prevents people acting in community from pursuing and achieving small footprint objectives. Particularly onerous are the ancient single use consumer driven zoning and other local ordinances that treat as crimes collection and reuse of materials (construction materials and gray water), clustered, group, and small handmade housing, including a streamlined EcoVillage Zoning process, on site food production, energy creation, and waste treatment. There should be a general requirement for less car centered communities that are multi use in walking distance for work, living, socializing, shopping, and other activities that make a community functional as well as friendly toward AB 32 goals.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-02-04 03:12:53

No Duplicates.

Comment 69 for Comments on the RTAC (sb375-rtac-ws) - 1st Workshop.

First Name: jim

Last Name: Silverwood

Email Address: yvonne@affirmedhousing.com

Affiliation:

Subject: Letter of support

Comment:

Support Letter for implementation of SB 375

Attachment: www.arb.ca.gov/lists/sb375-rtac-ws/168-letter_of_support_for_implimentation_of_sb375.pdf

Original File Name: Letter of Support for Implimentation of SB375.pdf

Date and Time Comment Was Submitted: 2010-06-21 15:09:09

No Duplicates.

There are no comments posted to Comments on the RTAC (sb375-rtac-ws) that were presented during the Workshop at this time.