

## **7 COMPONENTS OF SB375 THAT MAY IMPACT METHOD FOR “THE MOST AMBITIOUS ACHIEVABLE TARGETS”**

1. The Sustainable Communities Strategy (SCS) adopted by the Metropolitan Planning Organization (MPO) as part of the Regional Transportation Plan (RTP) and must meet a target for greenhouse gas emissions set by the California Air Resources Board “if there is a feasible way to do so.” (Gov. Code, § 65080(b)(2)(B)(vii).) “Feasible means capable of being accomplished in a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” Gov. Code, § 65080.01 (b).
2. SCS’s must not conflict with federal transportation planning and air quality requirements. (Gov. Code, §§ 65080 (b)(2)(B), 65080 (b)(2)(B)(viii), 65080 (b)(2)(H)(iv), and 65080 (b)(2)(J). Among the most relevant federal issues are: (a) guidelines for determining how much revenue can be assumed to be available to fund the projects; and (b) review of whether the land use assumptions are a realistic estimate of future growth patterns.
3. If a region determines it is not feasible to meet the target with its SCS then it must prepare an Alternative Planning Strategy that meets the target. The APS is not a part of the RTP. The APS must “identify the principal impediments to achieving the targets within the sustainable communities strategy” and describe how it includes “the most practicable choices for achievement of the greenhouse gas emission reduction targets.” (Gov. Code, § 65080 (b)(2)(H)(i) and (iii).)
4. Two changes to the requirements of the California Environmental Quality Act are provided primarily to encourage the construction of housing consistent with either an SCS or APS that meets the CARB target. The first set of changes limit project level analysis of (1) growth inducing impacts, or (2) project specific or cumulative impacts from cars and light-duty trucks trips generated by the project on global warming or the regional transportation network. (Pub. Resources Code, § 21159.28.) The second set of changes provide regions and local governments with the option to provide a variety of more extensive CEQA benefits, but only to housing and mixed use “transit priority projects” that meet stricter criteria (e.g. density, proximity to planned high quality transit, etc.). (Pub. Resources Code, § 21155.1.)
5. The region’s housing “allocation plan shall allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy.” (Gov. Code, § 65584.04 (h)(i)(1).)
6. A future development pattern that provides for a balance of jobs and housing is required. The SCS must “identify areas within the region sufficient to house all of the population...” (Gov. Code, § 65080 (b)(2)(B)(ii).) Also, the state Department of Housing and Community Development’s forecasted housing need for regions must, among other things, meet the following test: “The region’s existing and projected housing need shall reflect the achievement of a feasible balance between jobs and housing within the region using the regional employment projections in the applicable regional transportation plan.” (Gov. Code, § 65584.01 (d)(1).)
7. CARB shall update the regional greenhouse gas emission reduction targets every eight years and may revise the targets every four years based on changes in improved vehicle emission standards, changes in fuel composition, and other measures it has approved that will reduce greenhouse gas emissions, and prospective measures it intends to approve to reduce greenhouse gas emissions. (Gov. Code, § 65080 (b)(2)(A)(iii) and (iv).)