



September 20, 2010

Mary Nichols, Chairman
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Proposed regional greenhouse gas targets for SB 375

Dear Chairman Nichols and California Air Resources Board Members:

We greatly appreciate your diligent efforts to implement SB 375, California's Sustainable Communities and Climate Protection Act. The leadership and staff of the Air Resources Board have done outstanding work on a very short timeline. We are grateful for the time and energy put forth by MPO staff and leadership, and by the elected officials that serve on these regional bodies. On behalf of the many Californians represented by our undersigned organizations, we thank you.

Since the passage of SB 375, leaders around the state have given significant effort and serious consideration to how California's regional land use and transportation plans can better achieve their goals. We believe that, if implemented properly, SB 375 can result in communities that are sustainable, equitable, and healthy. It can ensure cleaner air; cleaner water; reduced rates of lung disease, obesity, asthma, and other chronic illnesses; more walkable neighborhoods and safer routes for walking and biking; protected natural areas and flourishing farms and ranchlands; and greater access to housing and transportation choices for all communities throughout California.

As the first, target-setting phase of SB 375 implementation comes to a close, we encourage the Board to not only finalize the greenhouse gas (GHG) targets, but also to make commitments that will ensure that SB 375 implementation achieves its full range of potential benefits. We urge ARB to take the following steps:

I. Support the draft greenhouse gas targets for the four largest MPOs and for the San Joaquin Valley

The greenhouse gas targets proposed in the August 9, 2010 ARB staff report for the state's four largest MPOs and for the San Joaquin Valley reflect the significant modeling and analysis efforts undertaken



by MPOs around the state. The staff of the four largest MPOs found these targets to be achievable. These targets provide a solid step forward toward more sustainable regional transportation networks that reduce the greenhouse gas pollution caused by cars and light trucks. We support the proposed greenhouse gas targets for these regions and ask the ARB Board to approve the staff recommendation.

II. Smaller MPOs should all have a reduction target of at least zero

The Regional Targets Advisory Committee (RTAC) recommended that all regions of the state have a part to play in SB 375 implementation and in meeting California's GHG reduction goals, and indeed, every region would benefit from cleaner air, protected watersheds, more transportation choices, and more affordable and walkable communities. Therefore, every MPO should have a target that represents a per-capita decrease – or at least a per-capita leveling off – of GHG emissions for both 2020 and 2035. For the state's smaller MPOs (Shasta, San Luis Obispo, AMBAG, Butte, Tahoe and Santa Barbara), staff has recommended that targets be set to a level commensurate with those MPOs' projected emissions baselines. While we appreciate the unique challenges faced by smaller regions, we suggest ARB adopt reduction targets of at least 0 (zero) for the smaller MPOs for both 2020 and 2035.

III. Establish a structure for evaluating Sustainable Communities Strategies

Leadership from the California Air Resources Board and the Regional Targets Advisory Committee (RTAC) has provided forums for important dialogue around SB 375 implementation. This dialogue has built stakeholder consensus on many key technical and policy questions that have arisen in the implementation of SB 375 and its groundbreaking approach to regional planning.

As the target-setting process winds down and the focus shifts to the creation and implementation of Sustainable Communities Strategies, we urge ARB to continue to play a strong leadership role. Specifically, we ask that ARB continue the dialogue begun by the RTAC and establish an inclusive, public process for monitoring the implementation of the GHG targets and evaluating each region's SCS. This process should achieve the following goals:

- **Ensure consistency and accuracy in modeling.** Regional agencies across the state should work from a uniform set of standards in their SB 375 modeling. As we speak, transportation and land use models are being improved to more accurately measure the benefits of policies and planning strategies. We encourage ARB to consider these improvements when evaluating the regions' SCSs. SCS targets should be met through concrete "ambitious but achievable" policy changes and not by mere shifts in the modeling technology.



- **Demonstrate and communicate a wide range of benefits.** As called for by the RTAC, ARB should identify metrics and indicators beyond GHG targets for SCS/APS proposals. These metrics should demonstrate and communicate a comprehensive range of benefits of the proposed SCSs, beyond reducing greenhouse gas emissions, including: public health improvements, reductions in air pollution, improvements to public health through increased active transportation options, increased choices for affordable housing and transit, lower household travel and housing costs, protection of and access to clean drinking water supplies, and better conservation of natural resources and working lands. ARB should use these indicators as a framework for evaluating SCS/APS proposals and then work with MPOs to report back on their progress against those indicators during the RTP implementation period. We stand ready to assist in helping to identify metrics and indicators that would be useful in this effort.
- **Ensure that the outcomes of SCSs are shared equally across all communities.** To enable the public and policymakers to see the impacts of various regional planning scenarios on Californians of all income levels and thereby ensure informed decision-making, ARB should develop a required set of social equity metrics and criteria to be applied at each step in the SCS/APS development processes. These metrics should address equitable access to the co-benefits described above, as well as measures of displacement, housing and transit affordability, and additional equity indicators that are tailored to each region.¹ ARB should also encourage each MPO to create and consider at least one scenario that tests the impact of the most equitable transportation and land use options on GHG emissions. Finally, ARB should provide guidance to the MPOs on how to avoid or mitigate any adverse social consequences in their SCSs and/or APSs, including increased housing and transportation costs, displacement, and economic and racial segregation.

IV. Identify resources for implementing SB 375 and developing other needed tools

Local governments, transportation agencies and redevelopment agencies are key partners in SB 375 implementation, and all of them face unprecedented financial challenges in the current economic and fiscal climate. The California Air Resources Board should work to identify and secure resources for local jurisdictions to use in planning that will implement SB 375 by partnering with state agencies and bodies such as the Strategic Growth Council and the State Legislature, as well as federal agencies and bodies such as the national Sustainable Communities Partnership. We also request that ARB direct

¹ For more information and a list of suggested metrics, see July 20, 2010 letter to ARB re: social equity in SB 375 target setting: http://www.climateplanca.org/CARB%20Social%20Equity%20Letter_FINAL.pdf.



research grants to develop tools and data that improve understanding of the relationship between GHG reductions and the equity, health, and conservation outcomes described above.

At its September meeting, we ask that Board make a commitment to taking action on these important issues. We have great appreciation for your work on SB 375 and appreciate the opportunity to provide these comments.

Sincerely,

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Planning and Conservation League

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