

**From:** [ARB Clerk of the Board](#)  
**To:** [Bechtold, Bradley@ARB](#); [Hopkins, Chris@ARB](#)  
**Subject:** FW: Jobs/Housing Balance to Reduce VMT, GHG, and Criteria Pollutants from Transportation  
**Date:** Wednesday, November 4, 2020 9:50:26 AM

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**From:** Bruce Abanathie <akassociates.planning@gmail.com>  
**Sent:** Wednesday, November 4, 2020 9:49 AM  
**To:** ARB Clerk of the Board <cotb@arb.ca.gov>  
**Subject:** Jobs/Housing Balance to Reduce VMT, GHG, and Criteria Pollutants from Transportation

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One of our best tools for reducing VMT is jobs/housing balance (match). This tool was addressed as part of the implementation workgroup recommendations of SB 375 (2006), hosted by CARB. This key tool has routinely and (seemingly) purposely been absent in local, regional, and statewide planning and policy documents as they relate to heavily urbanized areas. The absence of this tool has dramatically increased the “super commuter” element in CA – particularly those working in high jobs areas like the Bay Area, LA, San Diego, etc. and looking for housing in lesser costly areas.

In addition to creating a domino effect, forcing people in those recipient communities to move further away from their jobs in order to be able to compete in housing prices, the advent of the super commuter increases VMT for that worker, more VMT for the local workers from the recipient community, and increases GHG and critical emissions from transportation.

It is the responsibility of authorities to meet the recommendations of legislation such as AB 32 and SB 375. The RHNA program has never been amended to recognize these requirements and recommendations and has been a failure in meeting the needs of CA. I am hoping that HCD takes serious action in amending the RHNA assessment and implementation process and makes jobs/housing balance a required element in the approval of ALL building permitting, particularly in those heavily urbanized areas.

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