



NATURAL RESOURCES DEFENSE COUNCIL



Chair Mary Nichols and Members of the Air Resources Board
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95814

RE: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets

March 13, 2018

Dear Chair Mary Nichols and Members of the Air Resources Board:

It has been 10 years since the passage of SB 375, California's landmark legislation integrating land use and transportation to reduce greenhouse gas (GHG) emissions. Since then, we have had the honor of working with ARB, the MPOs, local advocates, and other stakeholders on its implementation. Together, we have achieved great success in developing regional plans throughout the State that cumulatively promise an 18 percent reduction in statewide GHG emissions below 2005 levels by 2035.

We look forward to building on these achievements, and offer the following four recommendations to ensure continued success during this critical update to the regional targets:

- 1. Adopt ambitious targets that require a change to business-as-usual land use and transportation.**

ARB staff's revised targets require only a 1 percent change from what regions already plan to achieve. Currently adopted regional plans would reduce statewide per capita GHG emissions 18

percent below 2005 levels by 2035. ARB staff's proposed targets would reduce per capita GHG emissions by 19 percent. In comparison to this marginal difference, ARB staff analysis of various potential land use and transportation strategies concluded that the regions could achieve up to an additional 5 percent reduction in GHG emissions.¹ We support more ambitious targets that require a change from business-as-usual.

The proposed targets also fall short of meeting the State's climate goals. To achieve the climate goals of SB 32, land use and transportation policies must achieve a 25 percent reduction, not a 19 percent reduction. The February 2018 ARB Staff report reads: "While currently adopted SB 375 plans achieve, in aggregate, nearly an 18 percent reduction in statewide per capita GHG emissions relative to 2005 by 2035, the full reduction needed to meet our climate goals is on the order of a 25 percent reduction in statewide per capita GHG emissions by 2035."² We appreciate Staff's recommended targets from June and October of 2017, rather than the last-minute revisions that weaken the State's standards, and we support increasing the target for SANDAG to 25 percent.

2. Focus on the MPOs' funding decisions and policies and the expected shifts in land use and transportation through improved transparency.

We applaud staff's proposal to require the MPOs to identify emission reductions from shifts in land use and transportation, rather than from exogenous factors (such as fuel price and demographics). Although accurate travel demand and emissions modeling is critical to the success of SB 375, the modelling can obscure the heart of SB 375: shift land use and transportation to improve health, reduce VMT, and achieve GHG reductions.

We recommend that ARB go further to improve transparency and empower stakeholders and the public to engage with SB 375 and the regional plans. Staff's proposed approach still relies on projected GHG emissions per capita, which can be difficult to interpret and translate into changes on the ground. For example, if ARB's new approach reveals that land use and transportation strategies account for 10 percent of the anticipated GHG reductions, the public still does not know how this reduction is being achieved and whether more can be done. MPOs claim that their SCSs represent the most aggressive and feasible scenarios, but it's difficult for the public to assess this claim. With more clarity, stakeholders and the public can better understand all the MPOs are doing to achieve the targets, as well as areas for improvement.

To make the RTP/SCSs and the projected emissions reductions more meaningful, we recommend clear and simple reporting on what the MPOs are specifically doing to achieve the reductions, as well as anticipated shifts in land use and transportation. It should be easy for all involved in SB 375 implementation to know:

¹ CARB Updated Final Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, February 2018, page 32.

² CARB Updated Final Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, February 2018, page 15.

- 1) The MPOs' key funding and policy decisions, such as funding by mode, grant programs that incentivize affordable housing, tolling programs, etc.
- 2) Anticipated changes in land use patterns and the transportation network, such as new lane miles by mode and percent of housing within half-mile of transit.
- 3) Anticipated shifts in travel behavior and mobility, such as VMT per capita and mode share.

ARB already reviews most of this information in the technical review of each SCS, but the information is irregular and buried in the technical appendices. We recommend making this information easier to understand and use, based on a simple template for all MPOs. Clarifying what is behind the model shifts power to the public, giving community residents and regional advocacy groups, as well as the MPOs, the tools to assess how ambitious the plans are and to track implementation.

The anticipated changes in land use, transportation, and travel behaviour can be used as benchmarks for SB 150 tracking.³ For example, if greater transparency reveals that an RTP/SCS is expected to result in a mode share of 15 percent transit, SB 150 metrics can be used to measure progress on achieving that mode share.

Improved transparency also allows ARB, stakeholders, and the public to compare the anticipated results of SCSs to what is required to achieve the State's climate goals. For example, ARB's Scoping Plan establishes the need for a 25 percent reduction in GHGs from land use and transportation by 2035, and ARB's 2016 Mobile Source Strategy assumes that statewide VMT will be 15 percent below baseline levels in 2050. We recommend ARB compare what is needed in each region to achieve the State's goals to the anticipated results of the SCSs. The California Transportation Plan provides ARB an opportunity for estimating the changes required in each region.

3. Perform a social equity analysis on the MPO's strategies and anticipated shifts in land use and transportation.

The twin crises of housing unaffordability and displacement, far from being adequately addressed in regional plans, are being exacerbated in some transit-oriented communities, pushing low-income workers and especially people of color into places on the exurban fringes, far from jobs and transit.

Improving transparency and clarifying the region's funding decisions, policies, and anticipated shifts in land use and transportation allows for assessment of how these changes benefit or harm low-income communities and communities of color. We recommend ARB conduct a social equity analysis of the strategies included in the RTP/SCSs. The equity analysis should assess whether the plan fairly and timely meets the needs of low-income communities and communities

³ Please see partners' comment letter dated March 12, 2018 regarding SB 150 Metrics.

of color, while reducing – not worsening – patterns of regional segregation and the risk of displacement. We look forward to supporting ARB in the development of the equity analysis.

4. Reiterate that the targets should be achieved through equitable strategies that reduce vehicle miles traveled (VMT).

Staff's February 2018 report reads: "CARB staff believes that to achieve the intent of the legislation and to maximize community co-benefits, the followings targets should be achieved predominantly through strategies that reduce VMT".⁴ This is supported by ARB's 2016 Mobile Source Strategy, which assumes a 15 percent reduction in total light-duty VMT in 2050 compared to baseline 2050 levels and which describes SB 375 as a mechanism to achieve these reductions. The resolution language should reference these State goals and the intent of SB 375 in reducing VMT to achieve the regional targets.

In addition, the resolution language currently does not include any reference to promoting social equity or the concerns of displacement and gentrification. Shifts in land use and transportation should be aimed at providing all Californians affordable opportunities to drive less and reside in transit-rich communities. Sustainable Community Strategies should be designed to protect the rights of communities of color and low-income communities who stand to suffer severe harms, such as displacement and unfair share of public investment. We recommend including the following statement in the target adoption resolution:

"Regions should analyze the potential beneficial and harmful impacts of SCSs on lower income Californians and communities of color, using a set of social equity metrics including jobs-housing fit; availability of affordable housing; cumulative housing and transportation costs for low-income households; percentage of population by income with access to transit; air quality for low-income communities and communities of color; and displacement risks by demographic. Regions should select land use and transportation scenarios that maximize both GHG reduction and positive equity impacts while avoiding or offsetting any negative impacts."

Thank you for your consideration. We look forward to continuing to support your critical work ensuring the successful implementation of SB 375.

Sincerely,

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The Environmental Council of Sacramento

⁴ CARB Updated Final Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, February 2018, page 33.

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