



California Air Resources Board
1001 I Street
Sacramento, CA
95814

March 23, 2017

Re: SB 375 Regional Greenhouse Gas (GHG) Emission Reduction Targets for California's MPOs

Dear ARB Staff:

We'd like to thank you for the opportunity to comment on ARB's target updating process under SB 375. As organizations working directly with disadvantaged communities throughout the San Joaquin and East Coachella Valleys, we feel it is critical that the state create sustainable solutions for communities burdened the most by inequitable land use policies and poor transportation planning. We believe the target setting process presents an opportunity for disadvantaged communities to experience co-benefits from greenhouse gas reductions and equitable land use and transportation planning.

Transportation contributes to 37% of our state's greenhouse gas inventory, and the San Joaquin Valley already experiences some of the poorest air quality in the state and in the country. We believe that ambitious targets encourage Metropolitan Planning Organizations (MPOs) to reevaluate land use and transportation planning to reduce emissions from transportation. The current targets allow for the continuation of the status quo, which is in stark contrast with our state's climate goals. We believe that as the responsible agency for the implementation of SB 32, the California Air Resources Board must urge MPOs to create stronger, more innovative Sustainable Communities Strategies (SCSs), and can do this by setting more aggressive regional targets.

The Scoping Plan and the target setting process presents an opportunity for investing in and planning for rural, disadvantaged communities and maximizing co-benefits to these communities. These co-benefits include improved air quality and public health, increased access to reliable, affordable public transit, and increased connectivity within and to other communities. Many of the communities throughout the San Joaquin Valley that we work with lack active transportation infrastructure and public transit options to help residents access the

services they need on a daily basis. Regions must prioritize projects that reduce Vehicle Miles Traveled (VMTs) and provide real options for residents in order for state climate goals to be reached. Additionally, MPOs must consider models that differ from the traditional modes of public transit to think more creatively about programs that would fit the distinct needs of rural communities, such as carshares and vanpools.

ARB must play an active role in ensuring that projects promoting infill development and investment in existing communities are prioritized over sprawl development so that regional land-use planning is aligned with reduction targets. Madera County, for example, is moving forward with a large residential project in the northwest area of the county with little to no affordable housing for low-income residents. This development will arguably increase VMTs and is therefore in direct contradiction of the intention of SB 375 and the state's climate goals as a whole. Higher, more meaningful targets would provide an incentive for MPOs to make decisions that are coordinated with the state's 2030 greenhouse gas reduction goals and would also encourage MPOs to seek funding for more equitable projects.

We urge ARB to be more critical of the MPOs reduction target recommendations and set higher targets to incentivize MPOs to include stronger programs and policies in their Sustainable Community Strategies. Ambitious programs will ensure that disadvantaged communities can experience the benefits that SB 375 intends to provide, and that communities on the frontline of climate change receive investments to build resiliency.

Sincerely,

Nikita Daryanani
Leadership Counsel for Justice and Accountability

Dolores Weller
Central Valley Air Quality Coalition