

September 28, 2016

California Air Resources Board

Sacramento, California

Submitted electronically to scoplan2030trnspt-ws

Governor's Office of Planning and Research

Sacramento, California

Submitted electronically to [ca.50m@opr.ca.gov](mailto:ca.50m@opr.ca.gov)

To Whom It May Concern:

As Southern California's largest nonprofit developer of affordable housing, National Community Renaissance is committed to helping to solve California's housing crisis. According to the State Treasurer's Office, California is currently 1.5 million housing units short of supply for the population that lives here today.

While we applaud the State's efforts to combat climate change and reduce greenhouse gas emissions, we are concerned that the new policies presented in both the "Vibrant Communities and Landscapes: A Vision for California in 2050" and "Potential State-Level Strategies to Advance Sustainable, Equitable Communities and Reduce Vehicle Miles of Travel (VMT)" will only to serve to worsen the State's housing crisis and cause housing costs to rise even further out of reach for low to moderate income Californians.

Already, rents in California are 50 percent above the national average, and a new home here costs 2 ½ times what it does elsewhere in the U.S. Placing further restrictions on land use will hinder new development, further constraining an already short supply of shelter.

While we are currently working on urban infill, transit-oriented, subsidized housing developments, we also realize that these alone are not enough to make shelter affordable for all Californians. The land prices in these areas are such that building a product that can be afforded by low to moderate income residents is impossible.

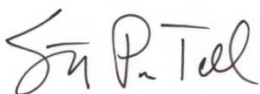


Therefore, we urge the following:

- Immediate withdrawal of the proposed policies, including a companion policy issued earlier this year to expand the California Environmental Quality Act (CEQA) to impose a statewide “road diet” and make the act of driving one mile in a car or pickup truck an adverse new environmental impact
- A commitment to obtain Legislative authorization prior to taking any agency action in furtherance of the non-statutory 80% GHG reduction target in any sector
- A commitment to engage in formal rulemaking prior to proposing or adopting any plan, policy, or regulation that modifies existing regional GHG reduction targets established under SB 375 in the land use and transportation sectors
- A commitment to use all available state resources and authority to timely complete transportation and infrastructure improvement projects approved by California voters, and transportation and land use plans and policies approved by local and regional agencies, that are consistent with the state’s approved SB 375 GHG reduction targets and Sustainable Communities Strategies, and to refrain from applying any new state policy, plan or regulation that would increase costs or otherwise increase regulatory obligations, burdens or risks on these voter-approved and SB 375 compliant projects
- A commitment to fully disclose and analyze the social, equity, economic, employment, and global (not just California) GHG consequences, to complete a comprehensive environmental impact report under CEQA, and to seek express Legislative authorization, prior to taking any action to modify any regional SB 375 targets or otherwise adopting any policy, plan or regulation that would increase the compliance costs, litigation risk, or cause any further delay, in the implementation of SB 375-plan compliant projects, policies and plan.

If you or your staff would like to discuss further or have any questions, please know that National Community Renaissance, including myself ([spontell@nationalcore.org](mailto:spontell@nationalcore.org)), is always available as a resource.

Sincerely,



Steve PonTell  
President and CEO  
National Community Renaissance

