



November 1st, 2013

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

Re: Climate Change Scoping Plan, First Update Discussion Draft for Public Review and Comment

Dear Chairman Nichols and Board Members,

The undersigned organizations would like to commend the Air Resources Board for your excellent work on the Scoping Plan Update. It provides a promising framework for the state to address the challenges of climate change, particularly as they relate to affordable places to live for low-income Californians.

We applaud the central role of SB 375 implementation in the Update. Given that transportation contributes 37% of greenhouse gas emissions, strategic investments in better land use are critical to reducing reliance on individual passenger cars. Locating homes near jobs, services, and transit is one of these land use strategies that should be recognized throughout the Plan. Currently, the introductory section on land use on Page ES-4 does not mention housing. We would encourage the consistent recognition of housing, specifically homes affordable to all Californians, throughout the plan.

We are very pleased to see that, on pages 79 and 80, the update identifies VMT reductions gained from locating and preserving homes affordable to low-income households in transit-rich areas. This is a great foundation that we would like to see more strongly connected to the key recommended actions listed in the Scoping Plan Update – particularly investing in transit-oriented housing development (TOD) and infill housing affordable to lower-income Californians.

On page 81, the Update calls for increased coordination of planning and infrastructure development, correctly stating that infrastructure siting decisions have considerable impact on emission reductions, and that siloed planning and development by various state agencies will not be effective in the future. To build on this premise, we encourage you to explicitly discuss the potential positive impacts of siting TOD affordable to low-income core transit riders near transit nodes.

Furthermore, to maximize the benefits of coordination, funding to support AB 32 implementation should be strategically deployed to projects and locations where investments will have the most long lasting and positive impact. Not only do we need to better align our resources among agencies, but also target them to those projects that have the highest impact on communities most affected by climate change. For example, the GHG benefits of investing in transit-oriented housing development affordable to low-income core transit riders are long lasting, as the homes remain affordable for at least 55 years under typical deed restrictions. By making targeted investments in affordable TOD in the near term, we can change commute patterns over time and reliance on freeways and individual passenger cars will diminish as a result.

On page 88, the Update calls for the Strategic Growth Council to take a lead role in supporting local and regional planning agencies. This section also asks that the State support implementation of SCSs and locally-driven GHG emission reduction efforts by providing funding and incentives needed to reach GHG targets. We certainly agree that planning and environmental review for transit corridors and transit station areas are unlikely to occur without public financial support and guidance. SGC-administered planning grants made to regions and local jurisdictions will allow them to respond to new transit investments by updating zoning, heights, parking requirements etc. in ways that reward compliance with the goals of SB 375. Funding these planning efforts would then set the stage for actual infrastructure development. With SGC playing an advisory role, agencies with experience administering infrastructure loans and grants should have the responsibility and autonomy to develop final regulations and award decision making standards for implementing programs.

The list of key recommended actions on page 90 don't yet reflect the importance of preserving and building homes affordable to lower-income households emphasized earlier in the document. Our community would be happy to engage in the development of recommendations to reflect the importance of housing siting in reducing VMTs through better land use patterns. Among them would be:

- Incorporate a Jobs Housing Fit measure into the MPOs' modeling in future Sustainable Communities Strategies. This action was recommended by the Regional Targets Advisory Committee in 2009 and again by the Environmental Justice Advisory Committee in August 2013. Early research indicates that it is beneficial to locate homes near jobs and services to reduce VMT in areas that are not served by high-frequency transit, but where proximity to employment centers allows for walking, biking, and shorter car trips.
- Provide guidance on encouraging land uses at transit centers that reduce vehicle trip reduction (e.g. affordable apartments, neighborhood serving retail, healthy food access, etc) and recommend that the criteria for allocation of public monies for transit center planning and infrastructure be weighted to encourage these uses.

Finally, we are very pleased to see the Department of Housing and Community Development's Transit Oriented Development Housing Program highlighted as a potential vehicle for successful implementation of near and longer-term GHG emission reduction strategies in Table 15. It is important to note that while this program has already made strides in changing land use patterns to reduce VMT, the final funding round is currently underway, and the funds will be exhausted this year. We were therefore glad to see that Table 16 lists "affordable transit-oriented development (TOD) and infill housing development that cut VMT" as a future funding priority. We would like to see more specificity in the table, including:

- Clarifying that the reference to affordable-transit oriented development means *housing* development
- More detail on what "large infrastructure projects" includes. Strategic small infrastructure investments may be equally valuable for increasing capacity for compact housing development near transit and other GHG reducing land uses.

In conclusion, we highly value the leadership the Air Resources Board has provided to the State and the nation in making the connection between VMT reductions and infill and transit-oriented housing that is affordable to low-wage workers and high propensity transit riders. We look forward to continuing our work together to implement strategies that allow us to reap the GHG benefits and the quality of life benefits from investing in this connection.

If you have questions about any of our comments, please feel free to contact Felicity Gasser with Housing California, at 916-287-9885 or fgasser@housingca.org.

Sincerely,

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