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**Via Electronic Mail:**

<http://www.arb.ca.gov/lispub/comments/bclist.php>

November 4, 2009

Mary Nichols, Chair, and Members of the Board  
**CALIFORNIA STATE AIR RESOURCES BOARD**  
1001 "I" Street  
Post Office Box 2815  
Sacramento, California 95812

**Re: PLC Comments re Comprehensive RTAC Recommendations**

Dear Hon. Chairwoman Nichols and Members of the Board:

Public Law Center (PLC) urges you to adopt the comprehensive recommendations from the Regional Targets Advisory Committee (RTAC) at your November 19, 2009, meeting. Crafted by a representative group of stakeholders, and your able staff, the RTAC report carefully balances greenhouse gas (GHG) reduction goals with social equity considerations of the impacts on lower-income Californians.

PLC is a not-for-profit organization that provides free civil legal services to lower-income individuals and community-based service organizations in Orange County. PLC clients include lower-income residents who live or work in areas affected by the RTAC recommendations, as well as organizations which are located in Orange County, or serve the OC community.

Although supportive of the report as a whole, we urge your particular consideration of the following recommendations:

1. Metropolitan Planning Organizations (MPOs), such as the Southern California Association of Governments (SCAG), should update their data collection and modeling to quantify greenhouse gas (GHG) reduction impacts of housing affordability, gentrification, and the jobs-housing fit. As defined in the report, "jobs-housing fit" is the extent to which rents and mortgages in a community are affordable to people who work there. A stronger jobs-

housing fit would allow Californians to reduce their commute times and distances<sup>1</sup>, thereby lowering GHG emissions, and facilitating economic growth<sup>2</sup>. However, this link needs to be tested and quantified<sup>3</sup>, as do the links between home affordability generally and gentrification;

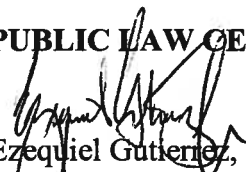
2. Performance measures for a sustainable communities strategy should include jobs-housing fit and five (5) other housing-related measures;
3. The progress of MPO's in meeting their respective goals should be measured through modeling, and other sound scientific approaches; and
4. The several co-benefits of greenhouse gas reductions should be measured and reported.

Based on the foregoing, PLC strongly recommends that the comprehensive recommendations of RTAC be adopted by the Air Resources Board.

Thank you for your time and consideration of these issues.

Respectfully submitted,

**PUBLIC LAW CENTER**



Ezequiel Gutierrez, Jr.  
Staff Attorney

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<sup>1</sup> Please see, *Growing Cooler: The Evidence of Urban Development and Climate Change*, by Reid Ewing, et al., published by the Urban Land Institute (Washington, D.C.: ULI-the Urban Land Institute, 2009), which reviews with approval, innovative California legislation, AB 32 and SB 375 at page 144 and elsewhere, and cites a leading research article by Certero, R. and M. Duncan, "Which Reduces Vehicle Miles Travel More: Jobs-Housing Balance or Retail-Housing Mixing," in the *Journal of the American Planning Association*, Vol. 72, Issue 4, 2006, pp. 475-489 (the jobs/housing balance reduces vehicle miles traveled more.) The ULI text contains at Chapter 9, Policy and Program Recommendations, a review of Federal Policy Recommendations, State Policy Recommendations, and Regional Policy Recommendations with a specific recommendation to "Provide for Workforce Housing near Jobs," and noting that "local governments have many options for promoting workforce housing [citing Haughey, R., *Developing Housing for the Workforce: A Tool Kit*. Washington, D.C.: ULI-the Urban Land Institute, 2007, including] enacting inclusionary zoning requirements that affordable homes be built along with market-rate housing."

<sup>2</sup> Doctoral research conducted at the University of California, Irvine, and published online in the prestigious *Journal of Urban Economics*, regarding traffic congestion in the Los Angeles metropolitan area (including Long Beach and Orange County), found that reducing congestion can help create jobs and sustain long-run employment growth and urged policymakers to "think more creatively." Affordable homes in proximity to transit and, thus, access to jobs would be consistent with the recommendation. See, Kent Hymel, "Does Traffic Congestion Reduce Employment Growth?" University of California, Irvine, September 17, 2008.

<sup>3</sup> Exhaustive research by SCAG, for its *CommunityLink 21, Regional Transportation Plan: Equity and Accessibility Performance Indicators*, found that the highest ridership of Urban Rail Transit is among the lowest-income segments of the region, those residents earning less than \$12,000/year (please see the bar graph at page 4-12 of the SCAG publication). Housing affordable to this income segment would thus play a prominent if not catalytic role in the success of any regional jobs-housing transit strategy.