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September 8, 2009

Regional Targets Advisory Committee  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**Re: Draft RTAC Report**

Dear Chairman McKeever and members of the Regional Targets Advisory Committee:

The Planning and Conservation League appreciates this opportunity to provide comments on the draft RTAC report. We thank the committee for its hard work in creating this document and for its dedication to exploring complex policy choices to support California in its transition to a low-carbon economy.

We urge the committee to make the following improvements to the report:

- The document should recommend target setting techniques and monitoring processes that capture the intricacies and nuances of complex land use and transportation decisions. Simplified methodologies that do not capture these complexities should only be allowed in the most limited of circumstances and should only be approved for use after demonstration of extensive efforts to improve the tools.
- The role of public participation should be elevated throughout the document. By recommending clear opportunities and minimum criteria for engagement in all steps of the target setting and monitoring process, the RTAC can help foster the accountability and transparency needed to meet the ambitious goals of SB 375.
- The document should recommend a more robust role for the assessment of co-benefits and social equity outcomes from proposed targets and policies. For example, the target setting process should require an analysis of factors such as public health impacts, acres of habitat and farmland converted, impact on access to housing and outdoor recreational opportunities, and local infrastructure costs at each stage of the target setting and monitoring process.
- The RTAC should provide preliminary recommendations to CARB on how to address climate impacts such as sea level rise, increased wildfire risk, and extreme heat events in the SB 375 implementation process, particularly in the target setting and monitoring stages. The recently released *draft California Climate Adaptation Strategy* highlights the need for such guidance:
  - "It is clear that managing impending climate risks (adaptation) must be a co-equal and integrated approach to avoiding climate extremes through reduction of GHG emissions (mitigation). While adaptation and mitigation measures are often complementary and overlapping, there may be unintended negative consequences without coordinated efforts." (p. 14)
  - "All significant state projects, including infrastructure projects, must consider climate change impacts." (p. 8)

- “In order for California to succeed with its adaptation strategies, local and regional governments and local and regional planning efforts must be integral parts of the adaptation process.” (p. 24)
- “Local Agency Formation Commissions, Metropolitan Planning Organizations and Councils of Governments will all need to consider the impacts of climate change when making decisions that impact land use and development patterns.” (p. 25)

The committee’s recommendations on this issue should be incorporated throughout the document, including in the setting of regional targets, the creation of Best Management Practices, proposed modeling improvements, proposed state actions to support implementation, and the education and outreach campaign plan.

Thank you again for this opportunity to comment. We look forward to reviewing the next public draft and working with the committee to ensure that SB 375 is a robust, effective policy that can be a model for the nation.

Sincerely,



Matt Vander Sluis  
Planning and Conservation League  
Global Warming Program Manager