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Doug Ito, Manager
SIP Local Government Strategies
Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Mr. Ito,

The Community Environmental Council appreciates the work CARB and the MPOs have done in implementing SB 375. This process has a potential to envision and plan for a better future for California and Santa Barbara County. Locally, better transportation planning could help alleviate our severe jobs housing imbalance, produce more housing and transportation options for residents, and reduce congestion and pollution, among other significant co-benefits. It's not just about GHG reductions.

While we understand the emphasis on the "Big 4 MPOs", we are very concerned about CARB staff's proposal to let SBCAG and five other MPO set their own SB 375 targets. This is not in the spirit of SB 375 and shortchanges Santa Barbara County's future. It is unfortunate that the target setting process has become politicized, with some MPOs building scenarios around their desire to minimize their targets rather than sound technical analysis. The flexible target setting process has allowed SBCAG to project a small increase in per capita GHGs in each of their Scenarios. Meanwhile, our less populous, more rural neighbor, SLOCOG, finds their preferred 2035 scenario decreases per capita GHGs by 13 percent! As described below, SBCAG rejected funds to do the land use analysis that other regions have accomplished. SBCAG's failings in this area shouldn't be a determining factor in letting them set their own SB 375 target.

SB 375's call for "ambitious and achievable" targets should result in at least a minimum level of per capita GHG reductions for all MPOs. This would encourage MPOs to share information and take a more detailed look at target compliance strategies. SBCAG is almost unique among all the MPOs in that they have failed to provide a reasonable analysis of scenarios that could help alleviate the transportation and housing problems we face locally. Santa Barbara County's demographic and travel behavior is very similar to our neighbors, Ventura and San Luis Obispo Counties. We ask that no MPO be allowed to set their own target, and that Santa Barbara County is given a similar target to Ventura or San Luis Obispo Counties.