



July 30, 2010

Ms. Lezlie Kimura Szeto  
SIP and Local Government Strategy Section  
California Air Resources Board  
P.O. Box 2815  
Sacramento, California 95812  
Fax: (916) 322-3646

RE: SB 375 Draft Targets

Dear Ms. Szeto,

On behalf of a number of infill developers from around the state, we are writing to express our support for ambitious regional targets to be adopted by ARB pursuant to SB 375.

The California Infill Builders Association represents the unique interests of the infill development community. We educate industry and civic leaders, government policy-makers, and the public about the economic, environmental, and social benefits that distinguish well-planned and well-designed infill development.

We support the promise of SB 375, and its successful implementation. As the ARB considers the adoption of greenhouse gas emission targets for the 18 Metropolitan Planning Organizations in CA, we offer the following comments and input to the process:

- **Set ambitious targets** - The successful implementation of SB 375 will require ARB to adopt ambitious regional targets. We must challenge our regional and local governments to change the way we plan and develop our communities and transportation systems to reduce vehicles miles traveled and greenhouse gas emissions while also protecting and improving public health and the environment. An absolute reduction of 30% is required by 2020 to meet the requirements of AB 32 and to avoid the most costly impacts of climate change. While this overall state target is certainly ambitious, the place to compromise is certainly not in land use policy, because the location of a new town cannot be retrofit in the same way cars and appliances can. We also urge the ARB to use absolute targets rather than per capita targets.
- **Consider the economic benefits of infill development** - Consider the economic impacts of the current shift in market demand towards more walkable, mixed-use neighborhoods. A new state analysis, conducted by Calthorpe Associates, finds that by 2050, through better planning and development, California households could save \$6,400 annually on auto and

utility costs; cities and counties could save \$4.3 billion annually on infrastructure costs; and Californians would cut the number of miles we drive by 3.7 trillion miles. This is equivalent to taking ALL cars off the roads for 12 years.

- Leverage existing resources - There are existing resources to help support this effort. Aside from the billions already lined up for investments in transportation, housing, and other infrastructure; over the next three years, California's Strategic Growth Council will allocate \$60 million in grants to cities, counties, and MPOs for planning activities. Activities consistent with SB 375 are eligible for this funding. At the federal level, the new Office of Sustainable Communities at HUD is offering \$100 million in Sustainable Communities Planning Grants through an initiative designed to promote regional planning efforts that integrate housing and transportation decisions. SB 375 has given California a head start, and ambitious targets will ensure California increases its lead in competitiveness and that these funds go farther towards making real differences in our communities.
- Consider co-benefits - Consistent with RTAC recommendations, we urge ARB to work with stakeholders to identify performance measures for the co-benefits of SB 375 implementation, including public health, environmental, and economic benefits. This will enable the best plans with the most comprehensive set of benefits to be developed and implemented.
- Coordinate with the Strategic Growth Council - We support coordination of the SB 375 implementation effort with the Governor's Strategic Growth Council (SGC), cities, and other state agencies pursuant to Public Resources Code commencing with Section 75120, enacted by the passage SB 732 (Steinberg) in 2008. Building sustainable communities and reducing our greenhouse gas emissions through land use and transportation planning is critical; however, to make sure we do it the most efficient and effective way while also providing benefits to our economy, environment, and people, we must consider a number of other factors. This is the mission of the Strategic Growth Council.

We appreciate the ARB, RTAC, and MPO efforts towards setting targets pursuant to SB 375 through this process, and we look forward to continuing to work with the ARB and all parties involved as this process moves forward.

Sincerely,

Meea Kang, President and Board Member  
(Domus Development)

Kirstie Moore, Board Member  
(Coddling Enterprises)

Michael Deiden, Board Member  
(Creative Housing Associates)

David Mogavero, Board Member  
(Mogavero Notestine Associates)

