

June 18, 2010

Mary Nichols, Chairman
California Air Resources Board (CARB)
1001 "I" Street
Sacramento, CA 95814

RE: SB 375 Community Participation

Dear Chairman Nichols:

The Kennedy Commission is a broad based coalition of community organizations and advocates that focus on building sustainable communities by creating a supportive environment for the creation of affordable home opportunities for families earning less than \$20,000 annually in Orange County.

The Commission would like to acknowledge the extensive work the California Air Resources Board (CARB) has done to prepare a framework to embark on the implementation of SB 375 and setting regional targets to reduce greenhouse gas emissions from motor vehicles.

As CARB move towards planning for SB 375 implementation and setting regional greenhouse gas emission targets, the Commission would like to emphasize the importance of seeking out and considering input from traditionally underrepresented group and organizations that represent or advocate for these underrepresented groups. We want to ensure the plan and strategies provide for early and meaningful public participation in the decision-making processes in the implementation of SB 375 and setting regional targets for greenhouse gas emission. In addition, we ask CARB to set ambitious targets that facilitates the development of sustainable communities at a regional level.

The Commission believes the implementation of SB 375 and setting regional targets for greenhouse gas emissions can address environmental, transportation and housing issues to create more sustainable and healthier communities in Orange County. While SB 375 has great potential to enhance the quality of life for residents, the Commission is deeply concerned that without specific language, strategies and modeling, SB 375 implementation strategies could fail to address housing needs and affordability as key factors to reducing vehicle trips and commutes that will create more sustainable communities.

Orange County ranks among the top ten least affordable metropolitan areas in the country, the need for homes affordable to low-wage earners is enormous (National Low Income Housing Coalition (NLIHC), 2010). Orange County's Fair Market rent for a two-bedroom apartment is \$1,594 and the housing wage (hourly wage needed to afford a typical two-bedroom apartment) is over \$30.00 per hour (NLIHC, 2010).

In order to afford the average priced apartment in Orange County, a minimum wage earner must work 151 hours a week or have 3.8 full-time jobs (NLIHC, 2010). Also, the high cost of housing forces many households looking for an affordable home to live outside Orange County (i.e. Inland Empire) while working and commuting to Orange County's job centers (Orange County Business Council Workforce Housing Scorecard, 2007).

As CARB reviews the Metropolitan Planning Organization's (MPO) planning scenarios and prepares to release the region's draft greenhouse gas emission targets, the Commission urges that the following issues be addressed:

Effective Public Participation

The creation, planning process and implementation of SB 375 should be conducted with meaningful outreach and participation from: 1) low-income and minority community members and; 2) the partnering of affordable housing advocates and developers to ensure that the un-met needs of homes affordable to families are addressed.

Affordability for Extremely Low, Very Low and Low-Income Households

SB 375 should be created and implemented to ensure that the development of affordable homes for extremely low, very low and low-income families are encouraged and facilitated. Specifically, CARB should ensure MPO planning scenarios and the draft target setting encourages and facilitates residential rental developments that are 100% affordable to lower income families.

While SB 375 promotes higher-density development, higher-density does not necessarily produce more affordable homes. In Orange County, higher density mixed-use and transit oriented development have been planned or developed to provide housing opportunities for higher income households. These developments lack housing opportunities that are affordable for lower income households.

Performance Measure Consideration

To facilitate the development and objectives of an effective SB 375, the process in setting the region's greenhouse gas emission targets should reflect, analyze and incorporate performance measures such as: 1) co-benefits that positively impacts and maximizes community and environmental community benefits and; 2) jobs-housing "fit" that addresses the discrepancies between the housing costs of a community and the actual wages and earnings of the residents living in the community.

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By addressing these concerns, our goals in the implementation of SB 375 and reducing greenhouse gas emissions would be achieved.

The Kennedy Commission looks forward to working with CARB to achieve our mutually beneficially goals in creating more sustainable, healthier and equitable communities in Orange County. Specifically, the Commission welcomes the opportunity to continue our dialogue that will result in the production of new homes affordable to extremely low, very low and low-income households.

If you have any questions, please feel free to contact me at (949) 250-0909 or cesarc@kennedycommission.org.

Sincerely,



Cesar Covarrubias
Executive Director

cc: Hasan Ikhrata, SCAG