

**2014 Target Update Process  
Summary of Public Comments Received by ARB  
At Public Workshops  
In Written Comments**

**Table of Contents**

<i>American Lung Association Written Comment</i> .....	2
<i>Kern Council of Government Letter</i> .....	3
<i>Shasta Regional Transportation Agency Letter</i> .....	11
<i>Public Solar Power Coalition Comment Card</i> .....	14
<i>Public Health Alliance Comment Card</i> .....	15
<i>Sierra Club Letter</i> .....	16
<i>Center for Demographic Research, California State University Fullerton Email</i> .....	20
<i>Climate Plan Letter</i> .....	21
<i>Southern California Association of Governments (SCAG) Letter</i> .....	28
<i>League of Women Voter (Fresno) Email</i> .....	30
<i>League of Women Voters (Fresno) Letter</i> .....	31
<i>League of California Cities Letter</i> .....	33
<i>Transportation Solutions Defense and Education Fund Letter</i> .....	36
<i>PolicyLink and Leadership Council for Justice &amp; Accountability Letter</i> .....	40

SB375 - Comments from Lung Association  
Sept 9, 2014 Fresno Workshop.

**Good Afternoon**

**My name is Heather Dumais. I am the SJV Air Policy Coordinator for the ALA in CA. I live in Tulare County and I have worked on SB 375 for the past few years in Fresno and Kern Counties.**

**We ask the targets be updated in time to apply to the Round 2 Regional Transportation Plans in all regions with "placeholder" targets – including the Valley.** We know more now. The original targets were not based upon Valley-wide scenario modeling. The target-setting should build upon CARB's technical review of Valley 2014 plans and apply lessons learned in Round 1.

The Valley's serious air pollution and health problems call for the strongest possible strategies to promote sustainable communities.

- Many Valley COGs could reach the current targets with their Business as Usual scenarios.
- Several COGs had overshoot the targets before the planning period began.

**We must also ensure that modeling to meet the targets are accurate, and close loopholes such as the discounting of interregional trips.**

**We feel ARB can play a crucial role in helping regions learn how to use available tools to measure the health, equity, and environmental benefits of their scenarios.**

We feel health metrics including increased minutes of physical activity, increased share of trips from transit, walking and biking, reduction in air pollution and chronic illness, increased frequency and proximity of transit should be incorporated into the SCS update process.

Premature death rates in the lowest-income Valley zip codes are nearly twice those in the highest-income zip codes and air pollution places a tremendous health burden on Valley residents, adding up to \$6 billion in annual costs to the economy, \$135 million in annual hospitalization charges for asthma, and taking the lives of 1,500 Valley residents per year. All Valley Counties have higher rates of asthma than the state average. 21.3 percent of Fresno County children have been diagnosed with asthma. The SCSs provide us with a great opportunity to improve health, particularly in the lowest-income areas.

We believe a major focus in Round 2 should be to adopt best practices used in other regions. And, we appreciate the efforts that Fresno COG has put forth since their adoption of their 2014 RTP and encourage the COG staff to continue these efforts.

We feel ARB develop guidance and work with other agencies (OPR, SGC) to develop and implement strategies to gather, share, incentivize, and implement best practices, and encourage future innovation. We feel this is essential to ensure that the SB 375 process provides the best community benefits in health and air quality.



**Kern Council  
of Governments**

September 10, 2014

Mary Nichols, Chairperson  
California Air Resource Board  
P.O. Box 2815  
Sacramento, CA 95812

Re: Preliminary Draft Staff Report – SB 375 Greenhouse Gas Emissions Reduction Target Update Process

Dear Ms. Nichols:

Thank you for the opportunity to comment early on the SB 375 GHG Target Update Process. Kern COG staff has been working closely with ARB and the 8-San Joaquin Valley COGs in development of our modeling for the SB 375 target setting and demonstration process. From this experience over the past 5 years we have gained some insight that may help improve the process.

- Since the grassroots Blueprint vision efforts, Regional Transportation Plans have dramatically changed in California. Expenditure plans have shifted billions from highways to transit, bike and pedestrian projects. In Metropolitan Bakersfield, new development pattern assumptions combined with this expenditure shift will increase the number of people with access to high quality transit by 4000%.
- Tools and resources are needed such as redevelopment financing for sewer, water, bike, and pedestrian improvements, to make infill areas more competitive with the urban periphery.
- Small and mid-sized MPOs have limited resources that need to focus on early implementation of these plans rather than modeling, so we recommend targets not be significantly revised until the 3<sup>rd</sup> Sustainable Community Strategy (SCS) cycle to make best use of resources.
- New targets in the middle of the 8 year RHNA/Housing Element cycle could create conflicts between the new SCS development patterns and local housing elements.

Attached are detailed comments to the Preliminary Draft Staff Report on the Target Update Process that was posted on your website August 25, 2014. We plan to continue working closely with ARB to realize the co-benefits identified in our SCS, including providing 7-times more alternative energy generation capacity than any other county in California. Please contact Rob Ball, Planning Director or myself if we can be of any further assistance.

Sincerely,

A handwritten signature in black ink that reads "Ahron Hakimi".

Ahron Hakimi  
Executive Director

Attachment

**Kern COG Comments on Preliminary Draft Staff Report – SB 375 GHG Reduction Target Update Process** ([http://www.arb.ca.gov/cc/sb375/pre\\_draft\\_target\\_update\\_sr.pdf](http://www.arb.ca.gov/cc/sb375/pre_draft_target_update_sr.pdf))

**General Comments:**

- 1) **Grass Roots Approach to SB 375: Land Use Authority Rests with Local Governments**  
– Kern COG maintains that land use decisions are best made locally and that land use authority and residential development patterns rest with local governments as reconfirmed in SB 375. The collaborative approach between the Metropolitan Planning Organization (MPO) and their local jurisdictions will be an important model to continue in future Sustainable Community Strategy (SCS) and Target development. ARB should allocate the time required to facilitate a process that encourages MPOs to work with local jurisdictions during the initial scenario planning phase of the target setting process.
  
- 2) **Keep the Big Picture Goal in Sight** – As ARB is aware, the 80% below 1990 levels by 2050 is based on the International Panel on Climate Change (IPCC) scenario to minimize the harmful effects of climate change. IPCC has warned that achieving early reductions is essential to minimizing the need for more drastic reductions later on. With failure of many other states and nations to adopt the Kyoto Protocol, continued progress toward this goal is believed to be necessary to curtail the effects of global warming. ARB's February 2014 Updated Scoping Plan has set an early goal to reduce emissions from the entire transportation sector by 23 tons by 2020 (not just SB 375 land use and transportation improvements but fuels and vehicle technology as well). An additional 23 tons is forecasted to come from the Cap and Trade program by 2020. Cap and Trade credits purchased by fuel producers will create additional transportation sector reductions through higher fuel costs while funding sustainable infill development grants as well as reductions in other industry sectors.

Stakeholders from each industry sector believe they are doing all they can to reduce emissions. For example, the automotive and electric utility industries have the biggest potential for reducing emissions from the transportation sector. Setting a simplistic goal of 100% zero emission vehicles powered by 100% renewable electricity by 2050 would easily exceed the transportation sector's target share in the scoping plan (zero GHG emissions from highways by 2050 would surpass the 80% below 1990 levels). It is likely that the utilities and auto industry stakeholders would fight such a lopsided goal, and the prolonged time and cost to fully implement may require more drastic reductions in the future from other sectors. SB 375 has provided a way to get as much out of land use and transportation expenditure plans as possible, leaving the shortfall in the 2050 goal to be made up by the auto/utilities industries and Cap and Trade.

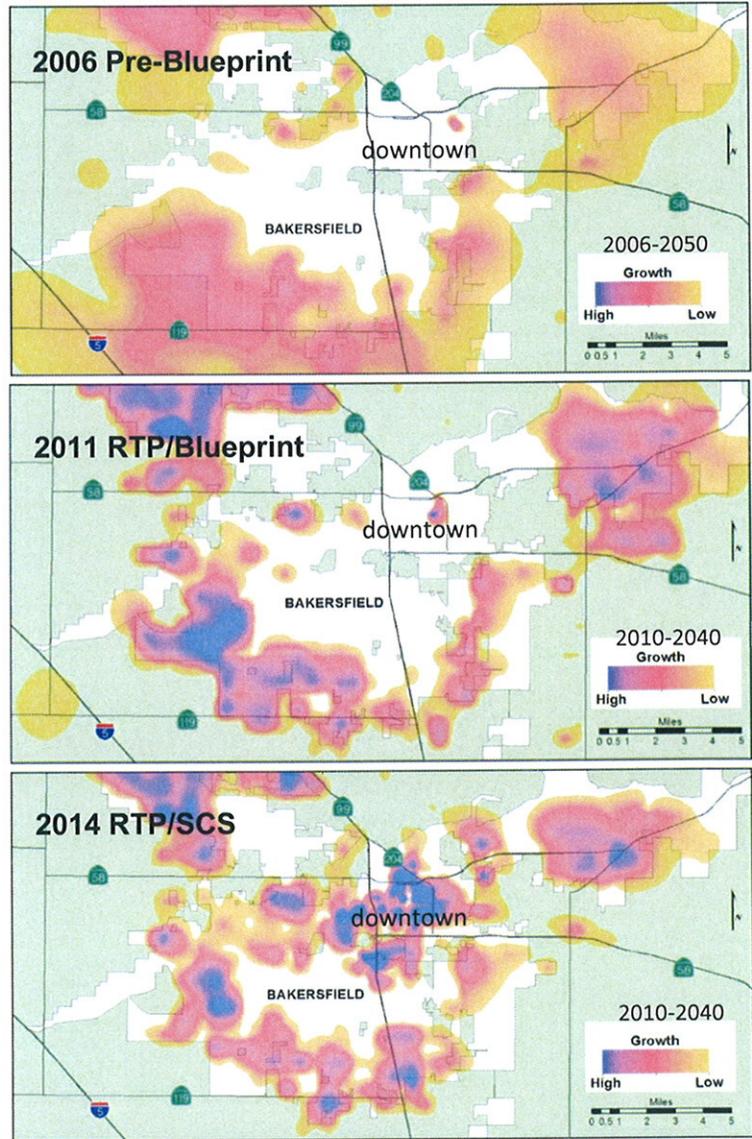
The big picture question for SCS target setting is: *How much emission savings can you get from SB 375's land use patterns and alternative transportation investment to achieve early reductions and equitably share the burden with other sectors in the Scoping Plan?* Some would argue that the current round of SCSs are already pushing the achievable limit while others believe we can do more. Regardless of your position, the first round of SCSs have

demonstrated a significant departure from the business as usual development patterns and past transportation expenditure trends. Figure 1 illustrates the dramatic change in future growth assumptions since the Blueprint effort. Some regional plans may require time and additional coordination to realize the forecasted emission savings, potentially resulting in an unanticipated burden on all industry sectors to pick up the slack should early reductions not be realized.

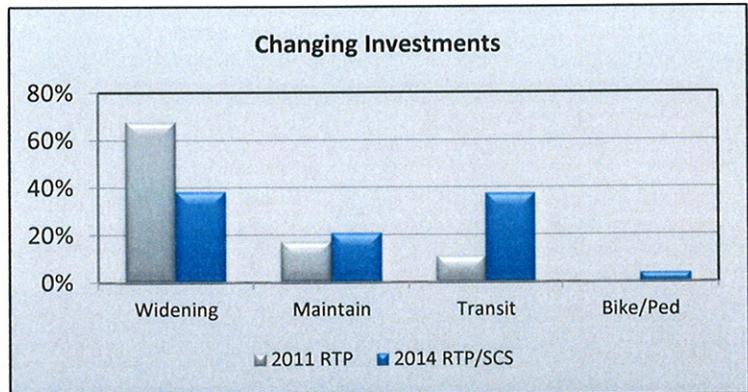
In addition, transportation expenditures have changed dramatically as well. Figure 2 illustrates the significant shift from highway widening to transit expenditures in Kern as well as increased funding for bike and pedestrian infrastructure. Similar shifts in funding can be seen in MPOs throughout the state.

Limited MPO and local government resources need to focus on implementing the strategies from the first round of SCSs. Additional tools are needed such as redevelopment and other financing mechanisms to make these plans reality. With these tools, the MPOs and their local government member agencies have a chance at making real progress at influencing development patterns and realizing the anticipated GHG reductions and numerous co-benefits of SB 375 land use patterns and transportation expenditure plans.

**Figure 1 – Changing Forecasted Development Patterns in Metropolitan Bakersfield**



**Figure 2 – Kern Transportation Investment Changes**



- 3) **Maintain Credit for Renewable Energy/Military/Prison Employment** - Consistent with the 2009 RTAC recommendations, ARB should continue the exemption for travel from economic activity within an MPO that is deemed of statewide, national economic or security significance. This should apply to significant land use related emissions reducing economic activities such as renewable energy production.
- 4) **Co-Benefit Performance Measure Tools** – In addition to Envision Tomorrow, Urban Footprint, Rapid Fire and other performance measure tools, an open source spreadsheet tool with clear documentation of assumptions should be developed as a back-up should an MPO lack time or resources to implement one of the proprietary tools.
- 5) **RHNA has an 8 Year Cycle to Implement the SCS, The Targets Should Not Change in the Middle of that Cycle** – Any changes to targets requiring changes to the SCS development pattern assumptions after only 4-years into the 8-year RHNA/Housing Element cycle could conflict with the adopted RHNA and housing elements, eliminating the streamlining benefits under SB 375, and potentially requiring additional zone changes by local governments.

#### Comments Related to Staff Report Text:

P. 9, second paragraph - **Modeling for Executive Orders differ from SB 375 Modeling** - The transportation sector regulated in Executive Orders S-3-05 and B-16-2012 include all transportation related GHG reductions, including state efforts, and not just SB375 related strategies (residential development patterns, transit, active transportation, etc.). Any performance measure comparing progress made toward the 2050 goal set by these executive orders must include all transportation related strategies, including clean vehicle technology and clean fuels strategies to be consistent with these Executive Orders and the Updated 2014 Scoping Plan. A similar benchmark year 2030 is discussed in the Scoping Plan and is for all transportation sources, not just SB 375 sources. Modeling efforts to compare any new interim years outside of SB375 2020 and 2035 years should measure all transportation related sources, not SB 375 sources.

P. 12, second paragraph, third sentence – **Clarification** - “The current metric is in units of GHG per-capita ...” could be more precisely worded. “The current metric is the percent change in units of GHG per-capita ...”

P. 12, second paragraph – **IV. A. 1. Nature and Magnitude of Targets - Maintain Current Method** - The current SB 375 efficiency metric of percent change in per-capita GHG emission needs to be maintained for several reasons. However an alternative measure should be considered.

- 1) To provide comparability with prior SCSs and track progress over time.
- 2) Changing the method would require MPOs to divert their limited resources to additional scenario testing rather than implementation of strategies.
- 3) Other proposed methods suffer from many of the same short-comings as the current method. For example, a VMT per-capita metric still relies on the same modeling assumptions and inter-regional travel methods.
- 4) VMT per-capita does not reflect the effect of the changes in speed distribution created by congestion on network, creating potentially misleading results.

- 5) VMT per-capita is normally provided as a performance measure with many MPOs providing their own target.
- 6) SB 375 does not make allowance for a VMT per capita target.

**Environmental Justice Target Consideration for Disadvantage MPOs** - MPOs dominated by disadvantage communities should be given credit for their lower economic activity in target demonstrating targets. Smaller, disadvantaged MPOs in the San Joaquin Valley and other areas have a GHG per capita (no percent change) that is significantly lower because of the lack of jobs and wealth in these areas. If a region is having difficulty meeting the GHG *percent reduction* target, an alternative target test demonstrating that the MPO is at least 10% below the statewide average of GHG per capita for all MPOs in the state should then be required. If the MPO meets this secondary criteria, the APS for the disadvantaged MPO should be waived. MPOs with low income populations have significantly lower GHG emissions than more affluent areas. This test was originally proposed late in the first target setting cycle.

P. 12, third paragraph – **IV. A. 1. Contd. - Do Not Support VMT Per-Capita Method** - VMT per-capita does not reflect the effect of the speed distribution on GHG emissions. For example: a scenario may have a lower VMT but with such high levels of congestion that the GHG emissions could be greater than a scenario with less congestion. To measure the true effect of changes in vehicle speed, EMFAC is used to analyze the emissions based on the speed bin distribution data from the travel model output in addition to total VMT. EMFAC then provides GHG emissions that should continue to be expressed in the current *percent change* per-capita GHG metric.

The proposal to use VMT per-capita appears to be an effort to better understand the effect of land use patterns/Transit/Active Transportation without the affect vehicle operating cost, technology and clean fuel assumptions in the model. One possible sensitivity test to measure the effect of these factors on GHG might be to run EMFAC for the years 2020 and 2035 SB 375 business as usual scenario and the alternative SCS land use/networks scenario using EMFAC vehicle mix for the appropriate current base year (i.e. 2014) on both scenarios. The emission values will be considerably higher than actual expected results in 2020 and 2035, but the emission changes will be limited to land use and network changes (transit, bike, walk, roads, etc.), and congested speeds in the model. However, this method essentially breaks the interaction between the changes made in the alternative and future changes in auto-operating costs, vehicle fleet and other factors. Consequently this sensitivity test should NOT be used for target setting and demonstration but only to provide a limited understanding of the sensitivity in emission changes. Any effort to use this method for target setting would result in emissions results that were not comparable to the original targets nor the scoping plan goals.

P. 12 last paragraph. – **IV. A. 1. Contd. – Do Not Support Uniform Targets** - Kern COG agrees that a uniform target does not encourage all agencies to do their fair share of emission reduction strategies.

P. 13 second and third paragraphs. **ARB should maintain the 2005 base year for several reasons:**

- 1) **Concern over apples to apples comparison** – Although MPO models are standardized in the SJV, they differ greatly from other MPOs statewide. The most accurate and appropriate methodology for determining the 2005 base year for one region may differ slightly from that in

another region because it is a better match for the model data and methods in that region. The base year for 2005 should be maintained to ensure comparability.

- 2) **Activity based models (ABM) are not appropriate for every region** – As stipulated in the 2010 RTP Guidelines, mid and small size MPOs do not require an ABM. These regions using step models should continue to use them, eliminating one of the suggested needs for updating the base year from 2005.

P. 14 Paragraph three and four – IV. A. **2. a. & b. Staggered Target Adoption/Timing of Applicability** –Regardless of timing, whenever possible, the same model should be used for both target setting and demonstration. This is difficult because of staggered releases of both travel demand model updates and EMFAC updates.

P. 14 last paragraph – IV. A. **2. c. Updating the 2020 target** - Models used for the ~2022 RTP cycle will likely be validated to a base year at least 4 years old (2018). Providing modeling results for 2020 should not be a too difficult for RTPs adopted as late as 2024. Note that a model validated to a base year of 2020 will be the closest thing to observed data for demonstrating true compliance with the 2020 target. MPOs should be encouraged to develop a validation model for 2020 when that data becomes available. Note that a 2020 base year model may not be available until after 2024 because of the delay in data availability for validating the model. When these 2020 model are available, might be a good time to revise the base year from 2005 to 2020.

p. 15 first bullet – IV. A. **3. Impacts of Technology and Fuels – Should targets be narrowly focused on reductions from land use and transportation strategies...? No.** State or federal laws require modeling to include more than just land use patterns and transportation projects:

- 1) **SB 375 calls out the need for additional emissions reductions from both land use and transportation improvements** - SB 375 Section 1 (c) states, *“Greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32.”* This section calls out the need for additional emissions reduction from both land use patterns and improved transportation.
- 2) **SB 375 requires economic incentives or costs** - SB 375 Section 1 (g) states, *“Current planning models and analytical techniques used for making transportation infrastructure decisions and for air quality planning should be able to assess the effects of policy choices, such as residential development patterns, expanded transit service and accessibility, the walkability of communities, and the economic incentives and disincentives.”* The sections calls out the inclusion of economic incentives and disincentives a.k.a. costs to be considered in emissions reductions.
- 3) **Federal law requires regional modeling to be sensitive to travel costs factors** - Federal Title 40 CFR Part 93.122 (b)(1)(vi) states: *“Network-based travel models must be reasonably sensitive to changes in the time(s), cost(s), and other factors affecting travel choices.”*

In addition, modeling land use, transportation improvements without costs and other assumptions breaks the interactions between these model variables potentially understating actual benefit of any one of the modeled variables.

P. 15 second bullet – IV. A. **3. Impacts of Technology and Fuels – How should the target setting methodology anticipate effectiveness of state initiated programs?** The SB 375 target setting approach should be kept as separate as possible when dealing with state initiated transportation sector programs accounted for in the Scoping Plan. SB 375 target years are 2020 and 2035, while the Scoping Plan adds potential additional model year of 2050. We would suggest the following approaches with the top down approach being what is currently available, and bottom up approach being the preferred goal and best method but requiring more time to develop:

- 1) **Top Down Approach** - SB 375 does not focus directly on statewide emission reduction programs such as clean fuels and technology. However, the 2014 Scoping Plan includes the year 2050 for all transportation sectors including fuels and tech. The most comprehensive methodology currently available for measuring the impacts of fuels and tech could be considered a top down approach. This method uses readily available state level forecast of fuel consumption to derive emission savings. To supplement this method, the Caltrans Statewide Travel Model output can be run in EMFAC for all vehicles and technologies. Unfortunately the statewide model lacks many of the new strategies modeled in the latest MPO travel demand models. The time it takes to update the statewide model to even grossly reflect local strategies in the MPO models could take an entire RTP cycle (4 years), assuming that that state and MPOs have resources for this update. By that time regional models have been updated again. Any use of the statewide model will likely lag behind the regional MPO models by at least 1 RTP cycle. The biggest drawback of the top down approach is that it lacks an up to date picture of the impact of MPO strategies.
- 2) **Bottom Up Approach** – MPO Travel Demand Model output developed for SB 375 can be run in EMFAC to include all non-SB 375 vehicles (i.e. trucks) and technologies (i.e. Pavley, Cap & Trade fuel cost increases, ZEVs) as required to analyze progress toward the Scoping Plan 2050 model year. These runs could focus on the Scoping Plan year 2050 or horizon year of the region’s next RTP (i.e. 2042). To get to a statewide number in the scoping plan, the statewide model would be needed to supplement the MPO emissions data for the non-MPO counties that are not required to model for SB 375 as well as interregional and out-of-state trips. Again, the statewide model will likely be 2 to 4 years behind the latest regional models, however this lag would have to be lived with. A similar approach is used for the periodic update of EMFAC with MPO model data. The default assumptions in EMFAC almost always lag behind the MPO models by one validation cycle.

Of the two approaches, the top down approach is currently available for 2050 analysis. It may take more than one RTP cycle to get to get to a more accurate bottom-up approach, but ultimately this approach would provide a more accurate picture off all transportation related emissions. Synchronizing the MPOs on the statewide travel model and EMFAC model update cycles might aid the bottom up approach.

P. 15 fifth paragraph – IV. A. **4. Engaging Regional and Local Governments** – A separate scenario evaluation process for target setting is not required by SB 375 and is duplicative of the SCS process. Although more local input is desirable, sometimes it may not be practicable. When this is the case, at the discretion of the MPO the next target setting process should use the results from the most recently adopted SCSs. At a minimum, this would insure that the local government involvement in the development of the SCS would be leveraged in setting the next cycle of targets.

P. 16 second paragraph – IV. A. **5. Providing Community Benefits - Redevelopment Tool Needed** – MPOs have provided extensive analysis of community benefits for infill and compact housing. However, extensive study in the San Joaquin Valley has revealed that the market does not exist to increase infill beyond the current SCS without additional subsidy. California lacks a tax increment financing tool (Redevelopment) to subsidize sewer/water/pedestrian improvements in aging infill areas so that infill development is more competitive with development of the urban periphery. Redevelopment is the critical tool needed allow regions to meet and work to exceed their targets.

P. 16 fourth paragraph – IV. **B. 1. Inter-regional Travel** – In 2009 the ARB RTAC recommended a method for accounting for inter-regional travel as well as the establishment of a committee to complete the update to the statewide model using the 2010 household travel survey data. There are several ways to deal with Inter-regional travel. The state-wide travel model is the most logical, comprehensive method for accounting for both inter-regional and through travel but will also take the longest to develop data and an appropriate methodology. Unfortunately, the statewide model was not ready for use in development of the first cycle targets and may still not be ready for use in the second cycle. If the statewide model method is not ready, targets should be set without the inter-regional VMT by regions from the statewide model. If the statewide model becomes available and a methodology can be developed to adequately account for inter-regional travel, then the targets should be updated to include the inter-regional VMT as recommended by the RTAC. Several issues must be resolved before the statewide model can be used for inter-regional travel calculation:

- 1) The statewide model validation update needs to be completed.
- 2) A script needs to be developed that outputs out-of-region (MPO) VMT for each MPO.
- 3) A feedback loop needs to be developed that allows MPOs to provide updated, generalized socio-economic data and networks for each MPO to test the effect on interregional travel.
- 4) The statewide model should be used as one validation data set to be compared with gateway volumes in the regional models and observed counts before use is considered in target setting.
- 5) As required by FHWA, MPOs prepare regional growth forecasts and we recommend they continue to do so. However, a statewide county-level economic, or early choice model is needed to forecast when jobs and housing move between coastal areas to inland areas (and out of state) to help inform socio-economic forecasts between the statewide travel model and the MPO travel models.

Without these issues resolved, inter-regional travel analysis should NOT be included the SB 375 target setting methodology. In the interim, each MPO should account for 100% of its internal to external and external to internal trips to capture as much of the VMT within their model as possible. External to external trips should remain out of the analysis as recommended by the RTAC. This method, though not ideal, works well for the big 4 MPOs whose percent of inter-regional travel is less than 5% of the total trips as well as the other MPOs (i.e. Kern) which have a similar low percent of inter-regional travel. These MPOs account for more than 75% of the SB 375 GHG emissions in the state. The remaining MPOs will continue to have disparate results until the statewide model can be employed successfully for target setting.



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**Daniel S. Little, Executive Director**

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September 10, 2014

Terry Roberts  
Manager, Sustainable Communities Policy & Planning  
Air Quality Planning & Science Division  
California Air Resources Board  
9480 Telstar Avenue, Suite 4  
El Monte, CA 91731

**Subject: Comments on ARB Preliminary Draft Staff Report, SB 375 GHG Emissions Reduction Target Update Process**

Thank you for the opportunity to comment on the first update of the regional greenhouse gas emissions targets pursuant to SB 375. We appreciate the time taken to articulate the various policy issues, background, collateral benefits, early successes, and statutory and regulatory framework.

The following comments have been organized to correspond to the policy and technical considerations discussed in the ARB Preliminary Draft Staff Report.

**Policy Considerations:**

1. Nature or Magnitude of Targets

- Regarding the target metric and how it's applied, we recommend not reopening what is the result of extensive past work effort, technical process, and statewide interagency consultation. Any practical benefits that might be gained do not justify the time and resources required to revisit this topic, and we believe would represent a distraction and lost opportunity to focus on moving forward with implementation efforts.
- Regarding more aggressive regional targets across the board, SRTA is evaluating reductions beyond its initial targets as part of the region's first Sustainable Communities Strategy. Recommendations for updated targets will be based on technical modeling, cost-benefit analysis, and a candid self-assessment of what might be achieved through concerted regional effort. It is requested that SRTA's initial planning process be allowed to play out before revised targets are considered.

Beyond this, we hope to look at what Shasta County might achieve when yoked in partnership with the state, including ARB. We highlight two examples in this regard:

First, it would be possible to further escalate targets if dedicated and ongoing funds are made available for SCS implementation. Although Active Transportation Program and Cap-and-Trade and funds will be distributed, the absence of regional guarantees and consistent allocations make it difficult, if not impossible, to incorporate revenue assumptions and corresponding projects into long-term planning and travel demand modeling.

Second, it is vital that the state back-up the work of MPOs serving on the frontlines of SB 375 implementation. More specifically, we appeal for a more substantive role in project selection in upcoming funding programs. Doing so will reinforce the nexus between collaborative SCS planning and funding. We believe this to be the difference between good projects and game-changing projects that bring about the magnitude of change envisioned by AB 32 and SB 375.

## 2. Timing and Logistics of Target Updates

- Regarding the timing of updates to regional targets with RTP planning cycles, there are various workable approaches, so long as target revisions do not impact an active RTP process. Target updates should only apply to future planning cycles that have yet to begin.
- The focus of target updates should be on 2035. Adjusting 2020 targets implies an agility in regional and local transportation and land use planning and implementation that simply does not exist.

## 3. Impacts of Technology and Fuels

- Regions should receive credit for GHG emissions reductions as a result of zero-emission vehicle programs. The targeted expansion of electric vehicle charging stations represents one of the most practical, cost-efficient, and community-supported strategies available to many regions.

## 4. Engaging Regional and Local Governments

- Regarding the need for ARB to encourage MPOs to work with their local governments early in the process, this work is already occurring. In Shasta County, local agencies have taken part in the earliest analysis, outreach, and planning efforts. Local plans – including general and specific plans – are in turn being developed in consultation with the region. Rather than add additional mandates, ARB could help to identify and share best practices between regions.
- Regarding community engagement, regions have voluntarily gone above and beyond SB 375 requirements. Mandating further activities is not necessary and may take away from best practices unique to individual regions.

## 5. Providing Community Benefits

- A broad range of benefits – beyond GHG emission reductions – are needed to build community consensus toward implementation of the various projects, programs, and

policies required to achieve regional targets. It is recommended that such benefits continue to be emphasized in state programs and policies.

**Technical Considerations:**

1. Interregional Travel

- Regarding interregional travel, SRTA commends efforts to establish a statewide tool (CA Statewide Model or other process) for estimating inter-regional travel between all regions of California. To ensure that the model is sensitive to the travel characteristics of all regions, we encourage ARB to continue to engage transportation modeling experts familiar with the challenges and diversity of rural and small-urban regions on the inter-regional travel working group. SRTA will continue to participate on technical advisory committees and offer input as needed.

2. Modeling tools and assumptions

- Smaller MPOs are hampered by data limitations, such as the small sample size of California Household Travel Surveys. In addition, many strategies being considered in smaller MPOs will require off-model calculations to estimate reductions in VMT and associated greenhouse gas emission. Efforts to identify uniform statewide assumptions for fuel prices, auto operating costs, economic conditions, and other assumptions would further cloud the accuracy of models in smaller MPOs. The update of targets in smaller MPOs will require more inter-agency discussion and a measure of flexibility between regions. We hope to work with ARB to identify the most accurate inputs and assumptions for Shasta County.

Overall, our experience working with ARB to date has been very positive and we look forward to working collaboratively in achieving California's goals and maximizing secondary benefits. Lastly, we ask that you please update page 7 of the staff report and future documents to reflect our new agency name – Shasta Regional Transportation Agency (SRTA).

Sincerely,



Daniel Wayne, Senior Transportation Planner  
Shasta Regional Transportation Agency (MPO)

DTW/jac

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PUBLIC WORKSHOP SEPTEMBER 11, 2014  
SENATE BILL 375 REGIONAL TARGETS UPDATE PROCESS

Commenter's Name (optional)

THIS MEETING SHOULD HAVE BEEN RECORDED  
& VIDEO TAPED / TRANSCRIBED / SOME WILL BE 'WIKY'  
NOT THIS

THE IPCC REPORT THAT CAME OUT THIS YEAR  
LAST TELLS ON A MUCH MORE DIRE SITUATION  
W/ OAS / CLIMATE CHANGE - I.e. ALVIN PESTROPZOS  
TALK OF CLIMATE CHANGE / JULY 2, 2014 LA TIMES  
STORY @ STANFORD UNIVERSITY - THE SEA LEVEL  
RAISE DURING THEIR STUDY WIPED OUT BY ACTIVE SEA LEVEL  
CRASH

Public Solar Power Coalition

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SOLAR CONVERSION NOW!

THE SUN MAKES THE WIND BLOW, WATER FLOW & PLANTS GROW IT'S  
THE ENGINE OF OUR ECOSYSTEM/ THE WAY THE WORLD WORKS

COMMENT CARD

PUBLIC WORKSHOP SEPTEMBER 18, 2014  
SENATE BILL 375 REGIONAL TARGETS UPDATE PROCESS

Commenter's Name (optional)

Carla Blackman, Public Health Alliance  
of Southern CA

UMT should continue to be the  
core of MPO reductions due  
to important health co-benefits  
of improved community design and  
increased active transportation  
mode share.

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darrell@dclarke.org  
September 18, 2014

Lynn Terry  
Deputy Executive Officer, California Air Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Dear Ms. Terry:

Governor Brown's Executive Order B-16-2012 mandates "California target for 2050 a reduction of greenhouse gas emissions from the transportation sector equaling 80 percent less than 1990 levels." For this and other reasons the Air Resources Board (ARB) must update the SB 375 2035 Greenhouse Gas Emissions Reduction Targets to put the State's Metropolitan Planning Organizations (MPOs) on a trajectory to achieve those reductions and protect the health and safety of all Californians.

Passenger vehicles emit 26% of California's total GHG emissions. Reducing vehicle miles travelled (VMT) via SB 375 is key to California meeting its GHG reductions for the transportation sector, along with federal / California MPG standards, clean fuels, and rapid growth of ZEVs. This letter will focus on (1) California's target for reduction of GHG emissions and (2) corresponding SB 375 reductions of VMT.

### **Necessity of strengthening SB 375 Targets**

Major events since the first SB 375 Targets were established in 2010 necessitate the Air Resources Board updating and tightening the SB 375 Targets:

- "First Update to the Climate Change Scoping Plan" (Scoping Plan Update), approved by the Air Resources Board on 5/22/2014, documents the urgency of rapid GHG reductions for climate stabilization.
- Governor Brown's 3/23/2012 Executive Order B-16-2012 mandates "California target for 2050 a reduction of greenhouse gas emissions from the transportation sector equaling 80 percent less than 1990 levels."
- The Cleveland National Forest Foundation, et al., v. San Diego Association of Governments 12/3/12 court decision found the environmental review for the transportation plan including ARB's SB 375 13% reduction target by 2035 deficient.
- MPOs are already preparing plans that include the year 2040.
- A full range of tools are necessary to achieve necessary VMT goals.

## California's 2035 Climate Target

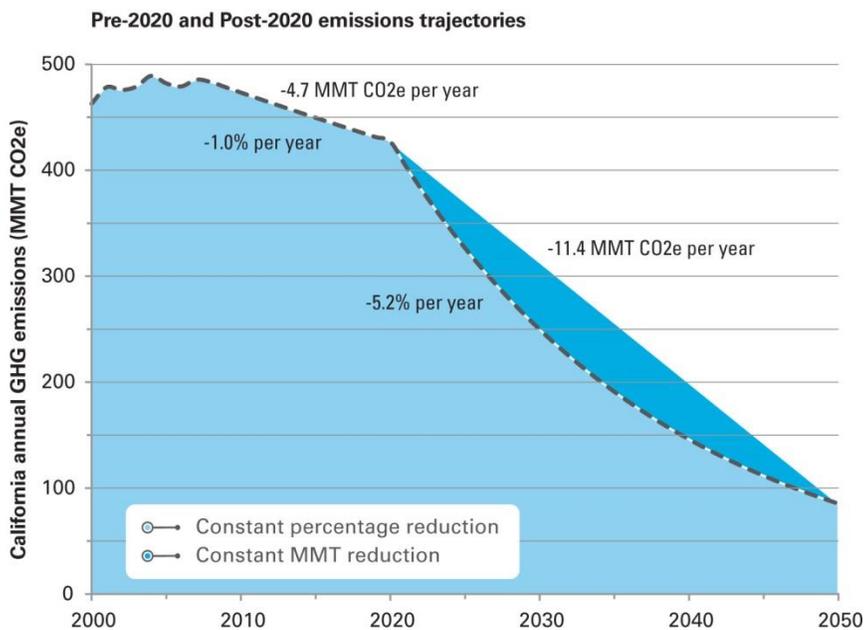
The Scoping Plan Update summarized current climate science and its urgency of rapidly reducing GHG emissions, especially<sup>1</sup>:

[A] recent paper by an international team of scientists (Hansen et al. 2013) asserts that the widely accepted target of limiting human-made global climate warming to 2°C above preindustrial levels is likely too high and may subject future generations and nature to irreparable harm.

Hansen et al.'s preferred scenario is for a "6%/year decrease of fossil fuel emissions beginning in 2013"<sup>2</sup> (which would imply a global target of 74% below 2013 levels by 2035). ARB's Scoping Plan Update stressed the need for scientifically based targets:

California will develop a mid-term target to frame the next suite of emission reduction measures and ensure continued progress toward scientifically based targets. This target should be consistent with the level of reduction needed in the developed world to stabilize warming at 2°C (3.6°F) and align with targets and commitments elsewhere.

**Figure 6: Framing the Path to 2050**



<sup>1</sup> <http://www.arb.ca.gov/cc/scopingplan/document/updatedscopingplan2013.htm>, page 14

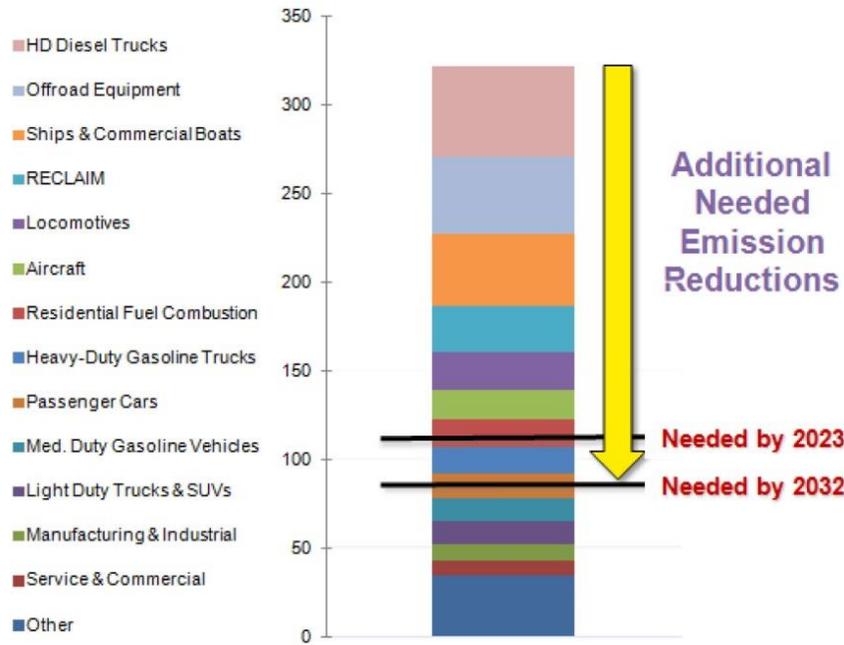
<sup>2</sup>

<http://www.plosone.org/article/fetchObject.action?uri=info%3Adoi%2F10.1371%2Fjournal.pone.0081648&representation=PDF>, page 10

The 2035 target for the curved line of 5.2% per year reduction equals **61%** reduction for the 2005-2035 SB 375 timeline.

### Regional Criteria Pollutant Attainment

The need to meet criteria pollutant standards is forcing some California regions to attain even greater reductions of both criteria and GHG emissions. For example, South Coast AQMD needs approximately 75% reduction in NOx by 2032:



\* Tons Per Day. Source: Ambient ozone modeling conducted by SCAQMD, 2012; final data

### SB 375 Policies

California has a unique role as the leading government in the U.S. seeking to reduce GHG emissions, which brings great responsibility to set a standard consistent with health and safety concerns.

As the ARB Preliminary Draft Staff Report states, “ARB’s first round of adopted targets was developed through a bottom-up process with input from the MPOs about what the MPOs believed they could reasonably achieve.” As the above context makes clear, that approach must be replaced by ARB mandating that all MPOs be on scientifically defensible trajectories consistent with at least the mandated target of 80% reductions by 2050, if not before, as well as protecting the health and safety of Californians.

The U.S. EIA Annual Energy Outlook for 2014 (Table 11)<sup>3</sup> projects a decrease in U.S. motor gasoline use of only 23% from 2005 to 2035, including the new car and light truck MPG standards through 2025.

<sup>3</sup> <http://www.eia.gov/forecasts/aeo/>

California's goal of 1.5 million ZEVs on the road in 2025 would represent about 5% of the fleet. If sales continue to grow at the same annual rate, about 25% of the fleet could be ZEVs in 2030. However, these measures are still insufficient to reach GHG emissions at least 61% below 2005 levels by 2035.

Therefore, California's SB 375 Sustainable Communities Strategy actions to reduce VMT must encompass a full range of policies – including effective driver incentives as well as development plans – such as the following:

- Plans for most new growth as infill compact livable communities that are well-served with transit, bicycling, and walking;
- Retrofit of existing areas with better transit and Complete Streets ("improve the efficiency and throughput of existing transportation systems" – page 9)<sup>4</sup>;
- Parking reforms including removing off-street parking requirements<sup>5</sup> and unbundling (separately pricing) the cost of parking;
- "[R]oad pricing and congestion management policies" (page 15);
- Promoting informal smart-phone-based carpooling that increases vehicle occupancy;
- Broader employer Transportation Management Programs incentives.<sup>6</sup>
- Rezone single family areas to reduce many trip lengths by allowing spot infill of markets, restaurants and services.

Sincerely,



Darrell Clarke

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<sup>4</sup> Air Resources Board Preliminary Draft Staff Report SB 375 Greenhouse Gas Emissions Reduction Target Update Process, August, 2014.

<sup>5</sup> <http://shoup.bol.ucla.edu/ResponseToAntiPlanner.pdf>

<sup>6</sup> <http://www.vtqi.org/tdm/tdm12.htm>

**From:** [Roberts, Terry@ARB](mailto:Roberts.Terry@ARB)  
**To:** [Volz, Amy@ARB](mailto:Volz.Amy@ARB)  
**Subject:** FW: Register for ARB SB375 List Serve  
**Date:** Monday, September 22, 2014 9:27:30 PM

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Amy,

can you please save Deborah's email in our "public comments" folder for the Sept 18 workshop?

Terry

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**From:** Diep, Deborah [ddiep@Exchange.FULLERTON.EDU]  
**Sent:** Monday, September 22, 2014 4:18 PM  
**To:** Roberts, Terry@ARB  
**Subject:** FW: Register for ARB SB375 List Serve

Hi Terry,

I just wanted to say thanks for the presentation last week. Not an easy job to do. And that I support Carla Walecka's comments and the idea of staggering the updates and making them effective for the third RTP/SCS cycle with no update to 2020 as it is so close.

Thanks!

Deborah Diep

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**From:** Dominguez, Sarah@ARB [mailto:[Sarah.Dominguez@arb.ca.gov](mailto:Sarah.Dominguez@arb.ca.gov)]  
**Sent:** Monday, September 22, 2014 1:41 PM  
**Subject:** Register for ARB SB375 List Serve

Good Afternoon,

Thank you for attending the ARB Public Workshop on SB 375 Regional Targets Update Process at SCAG last Thursday, September 18<sup>th</sup>.

We appreciate your interest in the targets update process and our upcoming Board item on October 24. If you would like to receive updates about this and other notices regarding SB 375, please subscribe to the List Serve using the following link. We apologize, but we are not able to independently add you to the list serve.

[http://www.arb.ca.gov/listserv/listserv\\_ind.php?listname=sb375](http://www.arb.ca.gov/listserv/listserv_ind.php?listname=sb375)

Thank you,

Sarah Dominguez

Air Pollution Specialist, Sustainable Communities Policy and Planning Section

California Air Resources Board

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September 25, 2014

Lynn Terry  
California Air Resources Board  
Sacramento, CA

Dear Ms. Terry,

On behalf of the undersigned groups, we are submitting comments on the timeline, process and key issues in the SB 375 target review process underway at CARB. We have greatly appreciated the partnership and collaboration with the state and Metropolitan Planning Organizations (MPOs) in the initial years of SB 375 implementation and look forward to working together again as we move forward into the second round.

Many of the MPOs around the state have made great progress in the first round of Sustainable Communities Strategy (SCS) development. Yet, we agree that much more improvement can, and must, be made in ensuing rounds to achieve successful SB 375 implementation and a truly healthy, equitable, sustainable future for California.

Below are the actions we recommend to the California Air Resources Board regarding SB 375:

- **Work with MPOs and COGs to spread best practices among regions**

The top priority for the Air Resources Board's efforts around SB 375, especially in the short term, should be to ensure land use and transportation policy progress via improved Regional Transportation Plans *and* their strong implementation. As a critical component of this update process, CARB should develop guidance and work with other agencies (ex. Office of Planning and Research, Strategic Growth Council) to develop and implement strategies to (a) gather, share, incentivize, and implement best practices, and (b) encourage future innovation. In addition, CARB staff should prepare workshops and reports for the CARB Board on both best practices and key implementation issues—such as modeling anomalies and coordination with county transportation planning agencies—to heighten awareness of challenges being faced at the local level and strategies to overcome them. Please see Appendix A for examples of best practices.

While much progress could be made by applying established best practices across the state, further innovation in policy, modeling, and performance analysis is also required in ensuing rounds. MPOs should be encouraged to experiment with ambitious new strategies and tools that might contribute to achieving stronger GHG reduction targets. The application of additional funding and resources should also be considered to foster these innovations. Examples include funding the modeling innovations and grant programs outlined in the appendix, providing "circuit riders" who help local jurisdictions develop active transportation projects, enhancing public participation processes, and providing technical and financial support from MPOs to local jurisdictions, such as SACOG's aid to targeted priority TOD project area development.

- **Develop guidance about how to measure and promote community benefits of improved land use and transportation planning, including equity, health, conservation, and sustainability benefits.**

Major innovations in the analysis and modeling of health impact and equity analyses have emerged in recent years. Further development and integration of these co-benefit analyses are essential in realizing the potential of SB 375. CARB can play a crucial role in helping regions learn how to use available tools to measure the health, equity, and environmental benefits of

their scenarios, and helping to develop improved tools like Urban Footprint and ITHIM. Health metrics including increased minutes of physical activity, increased share of trips from transit, walking and biking, reduction in air pollution and chronic illness, increased frequency and proximity of transit should be incorporated into the SCS update process. Beyond that, many regions included metrics for projecting and/or tracking their progress in protecting essential landscapes and advancing social equity. Measuring these benefits will help regions and CARB communicate the importance of this work to elected officials and stakeholders who make funding decisions. In addition, with SB 375's goal of locating more development near transit and in existing communities, concerns have emerged about displacement of existing residents. Further analysis of these unintended consequences is critical.

- **Commit to an ambitious, comprehensive update to regional GHG targets designed to meet state goals.**

California agencies need to act boldly if we are to reach the state's GHG emissions reduction targets, per AB 32 and Executive Order S-3-05. The SB 375 targets should be thoughtfully chosen to ensure successful emissions reductions from the transportation sector as a result of reduced vehicle travel. Because land use and transportation change takes time to occur, this target update should focus on the 2035 target. It should also add a new target for 2050. CARB should begin the target-setting dialogue by providing guidance about the level of GHG reduction above and beyond existing state transportation policies necessary to achieve the AB 32 Scoping Plan and the 80% below 2050 target under Executive Order S-3-05. The transportation sector should independently achieve those targets to carry its fair share of the weight.

- **In all regions with “placeholder” targets—including the San Joaquin Valley—consider updating targets in time to apply to the Round 2 Regional Transportation Plans (RTPs).**

Some of the smaller Metropolitan Planning Organization (MPO) regions received zero or positive targets. All of the small MPOs outside of the Valley overshot their targets and can clearly make stronger contributions to the state's climate goals than originally estimated. Revising the targets and building upon what has been learned can lock in the gains achieved to date and encourage continued progress.

The targets for San Joaquin Valley Councils of Governments (COGs) were also set relatively arbitrarily as 5% and 10% for 2020 and 2035. At the time of adoption, they were discussed as placeholder targets, with a promise to revisit them. As of September 2014, several of the San Joaquin Valley COGs are poised to exceed their 5 and 10% targets by substantial margins. In fact, some Valley COGs' Business as Usual scenarios were projected to exceed the current targets, and several COGs overshot their targets before the planning period even began. The San Joaquin Valley is one of the fastest growing regions in the state, home to some of the nation's worst air quality and some of the state's most disadvantaged communities. It stands at risk of losing some of the world's most productive farmland, as well as habitat crucial to preserving biodiversity in a changing climate, to inefficient business-as-usual development patterns. Based on what we learned from the first round and the great opportunity for emissions reductions in a high-growth area, and following CARB's review of the Valley's modeling in Round 1, CARB should revisit the Valley targets and determine whether updates should be made in time for Round 2 RTPs. The review process should be coordinated with CARB's technical review of the Valley's 2014 RTP's, and involve dialogue between ARB, Valley COGs, and other stakeholders, as further explained below.

- **Initiate a process now to update the targets no later than Round 3 in all regions.**

We believe that a model of continuous improvement should define our approach to ongoing implementation of SB 375 and the target update process, and that the threshold that may have defined “ambitious-achievable” in 2010 is most likely going to be different in 2020. Higher greenhouse gas reduction targets are not only attainable, but will lead to significant co-benefits of improved health and equity outcomes, farmland and natural resource conservation, water and energy savings, and household cost reduction.

We request that CARB update the targets for Round 3 well in advance of the adoption dates for Round 3 SCSs to provide sufficient time for incorporating new targets into the planning process. Also, we believe it is important to ensure that where target updates are deferred to Round 3, there should be a strong focus on spreading best practices and implementing the modeling improvements described above. This is especially important in the Big 4 MPO’s. While we agree that the targets must be strengthened in the third round, and that these revisions must be made as soon as possible, exactly what the timing of these revisions will be needs clarification and further discussion between CARB and the round table stakeholders. Ongoing RTAC/roundtable meetings between now and the target update should be convened to ensure stakeholders have an opportunity to jointly review demographic and economic trends, share reactions to proposals and broker consensus.

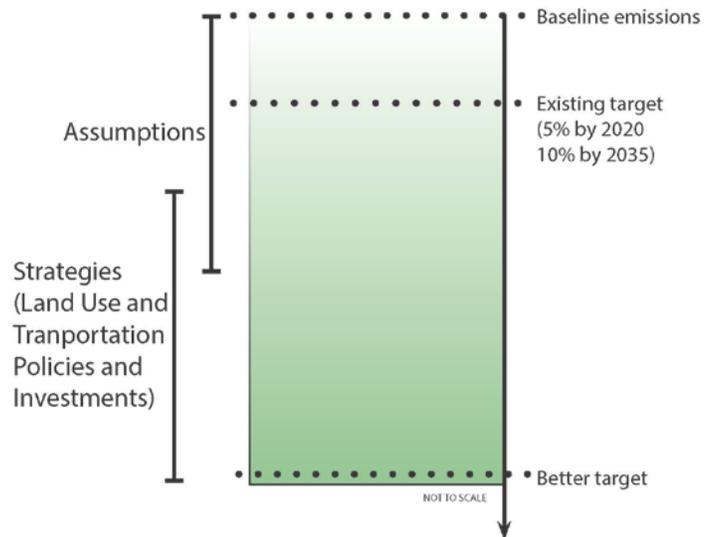
- **Ensure that the modeling methods and targets promote the intent of SB 375 for ambitious changes to land use and transportation policy.**

While we embrace other sources of GHG reductions, SB 375 efforts should focus on reducing vehicle miles traveled (VMT) and improving land use and transportation policy. The importance of SB 375 is clear in the findings language of the law: “without improved land use and transportation policy, California will not be able to achieve the goals of AB 32” (SB 375, Section 1(c)). “Action-oriented” plans developed under SB 375 should meet the targets via their development pattern, transportation network, and other land use and transportation measures and policies (Section 65080(a) and Section 65080(b)(2)(B)(vii)).

However, in Round 1, other factors have sometimes obviated the need to make land use and transportation improvements to reach the targets. For example, according to the Draft Kern County RTP/SCS and discussions with MPO leaders, the majority of reductions in the Kern County RTP/SCS are from assumptions, including increased fuel costs and an economic recession, not from the “action-oriented” strategies for which the language of SB 375 calls. Model assumptions and “action-oriented” strategies are interrelated and together effect travel patterns. But, the explicit reliance on assumptions raises a new question in the implementation of SB 375. Clarification is required on the role of factors such as these in achieving emissions targets. If assumptions do not come to pass, or if the assumed trends reverse, the climate benefits may be lost. Action-oriented strategies are needed to ensure long-lasting, sustainable reductions. The target revisions process should provide guidance about how to reduce the impact of assumptions and encourage ambitious policy advances.

Greenhouse gas emission reduction strategies that increase fuel efficiency of vehicles, such as promoting electric vehicles, can effectively complement land use and transportation planning and policies. However, these strategies do not meet the intent of SB 375 to reduce vehicle travel through coordinated land use and transportation planning. If regions account for reductions from these strategies that are not VMT-related, the targets need to reflect this use of alternative strategies. In addition, CARB should be sure not to “double-count” these strategies which might contribute to GHG reductions in programs other than SB 375.

Possible relationship between ASSUMPTIONS, STRATEGIES, and TARGETS



Targets should be rigorous enough to ensure that changes in land use and transportation are required to meet them, as intended in SB 375. Regions should not be able to rely on assumptions of demographic and economic conditions, modeling anomalies, nor strategies that are not related to VMT to meet targets. Instead, targets should increase to account for the role of assumptions and modeling methods in meeting the targets.

- **Ensure consistent and thorough accounting of interregional travel**

We must also reduce the number of potential inaccuracies in the GHG calculations, particularly around interregional travel. The original Regional Targets Advisory Committee recommended that VMT from interregional trips be split 50-50 between origin and destination regions. Instead, regions took responsibility for trips starting at their borders. Yet adjacent regions did not agree on how many trips passed between them, and if a trip crossed through two regions, *no* region took responsibility for the GHG from the middle segments. This could reduce accuracy and hinder efforts to make long-distance travel carbon-friendly. This is especially true in the San Joaquin Valley, where single-county regions mean more travel between regions.<sup>1</sup>

Righting these difficult modeling issues is not only necessary for the implementation of SB 375, but also for the GHG quantification methods for the Affordable Housing and Sustainable Communities program and other allocations of cap and trade revenue. Re-establishing the integrity of the GHG quantification methods is essential to the efficacy of the allocation programs and preserving the funding for the future.

- **Facilitate strong public participation in the target-setting process.**

CARB should strengthen the public participation process for target-setting. At a minimum, a second round of regional workshops should occur in 2015 before targets are set, and the Roundtable should continue to meet regularly. Much more dialogue is needed for all stakeholders to reach consensus.

<sup>1</sup> According to the 8 county Valley model, only 57% of Valley vehicle miles traveled occurs within a single Valley region.

We look forward to working with you and your staff to move this program forward and we stand ready to continue to lead the country in California's grand experiment in regional sustainability planning.

Sincerely,

Wendy Alfsen  
Executive Director  
California Walks

Matthew Baker  
Habitat Director  
The Environmental Council of Sacramento

Cesar Campos  
Coordinator  
Central California Environmental Justice Network

Stuart Cohen  
Executive Director  
TransForm

Amanda Eaken  
Deputy Director, Urban Solutions Program  
Natural Resources Defense Council

Bonnie Holmes-Gen  
Senior Director, Policy and Advocacy  
American Lung Association in California

Carey Knecht  
Associate Director  
ClimatePlan

Elyse Lowe  
Deputy Executive Director  
Circulate San Diego

Bill Magavern  
Policy Director  
Coalition for Clean Air

Marty Martinez, MPP  
Bay Area Policy Manager  
Safe Routes to School National Partnership

Soapy Mulholland  
Executive Director  
Sequoia Riverlands Trust

Daniel O'Connell, PhD  
San Joaquin Valley Program Manager  
American Farmland Trust

Liz O'Donoghue  
Director of Infrastructure and Land Use  
The Nature Conservancy

Katelyn Roedner Sutter  
Environmental Justice Program Director  
Catholic Charities, Diocese of Stockton

Linda Rudolph, MD, MPH  
Center for Climate Change and Health  
Public Health Institute

Phoebe Seaton & Veronica Garibay  
Co-Directors  
Leadership Counsel for Justice & Accountability

Sarah Sharpe  
Resilient Communities Program Director  
Fresno Metro Ministries

Julie Snyder  
Policy Director  
Housing California

Matt Vander Sluis  
Program Director  
Greenbelt Alliance

## APPENDIX

Examples of best practices include but are certainly not limited to:

### **- Expanding public participation:**

FresnoCOG allowed public stakeholders to self-nominate within a board-established set of categories (e.g., medical, agriculture) to ensure broad representation of key issues on its SCS Roundtable. They later ensured strong and diverse community attendance at public workshops, including numerous speakers of five different languages, by providing microgrants to a half-dozen community partners to host the meeting.

### **- Alignment of coinciding transportation planning processes with SCS Implementation:**

Project Performance Assessment Process: By analyzing 1000 transportation projects for their potential to help move the Bay Area region toward 10 regionally adopted performance targets, the MTC program makes clear how well current investments are aligned with regional goals and where there is room for improvement. Fresno too scored each transportation project to select the most competitive projects. We believe all regions could benefit from applying some version of this process in their regions, particularly with respect to identifying the projects most capable of reducing greenhouse gas emissions for the cap and trade expenditures while also maximizing community benefits.

### **- Funding, developing and reporting on health and equity needs-and-benefits analyses:**

One Bay Area Grant program: OBAG rewards jurisdictions for housing their share of the region's growth with a pot of funds specifically set aside for transit oriented Priority Development Areas. This program has also filled a small portion of the gap left by the dissolution of Redevelopment in providing funding to revitalize existing communities. OBAG supports active transportation and complete streets as priorities for grant projects. In addition, MTC provides Regional Safe Routes to School grants that provide direct support for active transportation.

Enhanced Health and Equity Analyses: In partnership with UC Davis, several regions have undertaken enhanced Health Impact Analyses to understand how growth patterns and investments may disproportionately impact certain communities within a region. San Joaquin, Fresno and Kern all benefited from such analysis this Round, and such information should be provided across all regions. To help improve health and equity analyses, two new modules—a Health Module and a Social Equity Module—for the Urban Footprint platform are in development at UC Davis. Regions would also benefit from the completion of the jobs-housing fit modeling started by SACOG and UC Davis, and better alignment of these analyses with the RHNA process.

### **- Funding, developing and reporting on natural resource and rural communities needs-and-benefits analyses:**

Rural Urban Connection Strategy: SACOG is undergoing an initiative that attempts to comprehensively assess the needs, values and economics of agricultural performance, goods movement, water quality and supply, biodiversity and habitat connectivity, and other ecosystem services including carbon sequestration, groundwater recharge and flood abatement. These efforts, with the goal of developing the first "Conservation Module" to the Urban Footprint platform, offers the ability to analyze scenarios and impacts on the rural landscape in conjunction with the urban footprint in unprecedented ways.

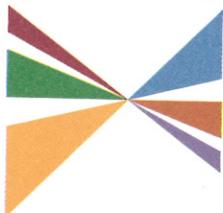
Regional Advanced Mitigation Program: Both Orange County and San Diego have adopted an innovative approach to conserving valuable resources and conservation lands. The Regional Advanced Mitigation Program (RAMP) seeks to identify impacts and pool mitigation dollars from significant regional transportation infrastructure projects and to collectively apply

mitigation dollars towards a coordinated and integrated conservation strategy, as opposed to piecemeal efforts.

One Bay Area Grant program: In addition to subsidizing urban priority development area TOD, a newly developed portion of this program also targets funding for important rural communities and conservation projects.

Fresno's Smart Growth Grant program: FresnoCOG has committed to evaluating the needs of the region's most disadvantaged communities and then using its flexible transportation funds to establish a new grant program to help municipalities address those infrastructure shortfalls while planning and building walkable, transit-ready communities.

SOUTHERN CALIFORNIA



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Deborah Robertson, Rialto

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Alan Wapner, San Bernardino

Associated Governments

September 26, 2014

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

P.O. Box 2815  
Sacramento, CA 95812

SUBJECT: SB 375 Regional Targets

Dear Chairman Nichols:

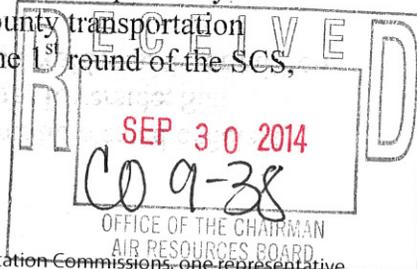
On behalf of the Regional Council of the Southern California Association of Governments (SCAG), I thank you for your leadership in ensuring open dialogue and building consensus during the SB 375 regional targets review process. I thank you for accommodating our region's needs by holding an additional public workshop regarding the SB 375 regional targets in Southern California. I particularly note the efforts of your staff Terry Roberts to make this happen, and her continued collaboration with SCAG staff and stakeholders.

As you know, the SCAG Regional Council includes over 80 elected officials representing six counties (Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial), 191 cities and over 18 million residents. Four million more residents are anticipated in our region by 2035.

Providing a sustainable transportation and land use plan for our 22 million future residents is an important responsibility, and SCAG continues to spend considerable resources and effort on planning for and implementing the 2012-2035 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). SCAG appreciates the Administration's on-going commitment to providing resources to allow SCAG to carry out this responsibility, and ARB's leadership on the policies and technical approaches to these efforts.

SCAG staff is now planning for the 2016 RTP/SCS, the round 2 RTP/SCS since SB 375 was enacted. As we move further into this process, we would like to share with you our perspective on the Air Resources Board's current review of the SB 375 targets.

- The 2020 and 2035 targets for the SCAG region should remain unchanged for the 2<sup>nd</sup> round of SCS (SCAG's 2016 RTP/SCS). Importantly, our focus is to work with our local jurisdictions, county transportation commissions, and stakeholders to implement the 1<sup>st</sup> round of the SCS, including showcasing best practices;



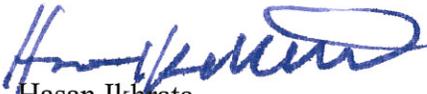
The Regional Council consists of 86 elected officials representing 191 cities, six counties, six County Transportation Commissions, one representative from the Transportation Corridor Agencies, one Tribal Government representative and one representative for the Air Districts within Southern California.

- SCAG supports ARB regarding an early review of the targets for the 3rd round SCS (SCAG's 2020 RTP/SCS), starting review in 2015, and will continue to work with your staff to facilitate strong public participation in the target-review process; and
- Though establishing a 2050 target is not included as a policy consideration in ARB's Draft Staff Report, it has been discussed by stakeholders at the SB 375 Roundtable meetings. Consideration of a 2050 target should occur during the 3<sup>rd</sup> round of the SCS (SCAG's 2020 RTP/SCS), acknowledging that this may require statutory change.

SCAG looks forward to on-going collaboration with ARB to further the efforts to plan for and implement sustainable communities throughout the State, especially in Southern California.

Should you have any questions or comments, please contact me at (213) 236-1944, or at [ikhrata@scag.ca.gov](mailto:ikhrata@scag.ca.gov).

Sincerely,



Hasan Ikhrata  
Executive Director

cc: Richard Corey, Executive Officer, ARB  
Hon. Carl Morehouse, President, SCAG

HI:jn

**From:** [Stephenie Frederick](#)  
**To:** [Roberts, Terry@ARB](mailto:Roberts.Terry@ARB)  
**Cc:** [carey@climateplanca.org](mailto:carey@climateplanca.org); [bonnie.holmes-gen@lung.org](mailto:bonnie.holmes-gen@lung.org); [Mary Savala](#); [nyla zender](#)  
**Subject:** Comments on SB 375 New-Targets Strategy  
**Date:** Wednesday, October 01, 2014 3:05:44 PM

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Dear Ms. Roberts:

Because of demanding local issues, the League of Women Voters, Fresno was not able to prepare commentary by October 1, 2014 on the Air Resources Board's draft proposal to set new GHG emissions-reduction targets.

We do, however, support the ClimatePlan letter to CARB signed by twenty advocacy organizations, including the American Lung Association.

Best regards,

Stephenie J. Frederick, Transportation Director  
League of Women Voters, Fresno  
559.298.7832

# The League of Women Voters of Fresno

1345 Bulldog Lane, Fresno, CA 93720

(559) 226-VOTE (8683)

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October 2, 2014

Ms. Terry Roberts  
Manager, Sustainable Communities Policy & Planning  
Air Quality Planning & Science Division  
California Air Resources Board

Dear Ms. Roberts:

The League of Women Voters, Fresno has several concerns about the SCS strategy for reducing GHG.

One, we are concerned that the SCS process in Fresno County may have little relevance to the heart of its RTP document. That heart is the transportation project list. This list was used unaltered in all of the SCS scenarios considered for insertion into the RTP. Only population and employment densities were moved around a bit, fancifully, to create mildly varying outcomes in GHG reduction. But if the project list – the reality of the RTP and SCS -- does not vary, what will SCS "implementation" consist of or achieve? Fresno County, for example, has budgeted 60% of its transportation funding from federal, state, and local sources for use in northeast Fresno County, the location of intense (and very profitable) housing development. Nothing about the SCS process changed this stark reality of the project list. Our conclusion is that the SCS process does little to nothing to affect local land-use decisions in Fresno County.

Two, SB 375 contains no incentives that command the attention of policy makers. That transportation funding might be withheld was a topic of concern during the most recent RTP round; when assured that no funding was at risk, policy makers relaxed and continued with an SCS-RTP process that was perceived as no more than a required exercise. We believe that until local governments have a solid reason to deviate from business as usual, they will not act to bring down GHG emissions.

Three, CARB's tracking of actual GHG reduction is of concern. It was quite worrisome to learn that CARB's modeling draws on data supplied by the very MPOs whose activities are being assessed. We suggest that, in addition to modeling GHG reduction, CARB consider using day-in, day-out empirical measures to estimate this reduction and verify the accuracy of its models.

Four, we believe that it is important for CARB to understand the modeling used by MPOs throughout the San Joaquin Valley. The variability of the SCS outcomes up and down the valley is puzzling; we do not believe that CARB can set new targets before understanding this variability.

Thank you for your consideration.

Sincerely,

Nyla Zender, President  
League of Women Voters, Fresno



1400 K Street, Suite 400 • Sacramento, California 95814  
Phone: 916.658.8200 Fax: 916.658.8240  
[www.cacities.org](http://www.cacities.org)

October 2, 2014

Ms. Terry Roberts, Manager  
Sustainable Communities Policy and Planning Section  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

Dear Ms. Roberts:

The purpose of this letter is to provide comments from the League of California Cities on the SB 375 Regional Targets Update Process. We appreciate the opportunity to comment and provide our perspective prior to the revised staff report and recommendations to the Air Resources Board meeting in October.

The League supported the target setting process outlined in SB 375 and credits much of the success in implementing SB 375 to the Air Resources Board's approach to the target setting process. The League continues to support the process outlined in SB 375 for updating the regional greenhouse gas emission targets every eight years. We respectfully suggest that updating the targets every four years is not warranted at this time based upon greenhouse gas emission reductions achieved by improved vehicle emission standards, changes in fuel composition, and other measures the Board has approved. If the Board decides to update the targets every four years, then the League requests that the board follow SB 375's direction to engage in a consultative process with local governments separately from metropolitan planning organizations. Finally, we request that the Board consider delaying updating the targets until all regions have a chance to demonstrate target achievement and an opportunity to evaluate the impact of the SCS on the region's greenhouse gas emissions.

#### **Engaging Cities**

The Preliminary Draft Staff Report mentions the importance of the input of both regional and local government to the success of SCSs and implementation. While the report seems to support engaging regional and local governments, most of the focus is on MPOs and much less so on local governments. The League supports the suggestion that ARB encourage a process whereby MPOs work with their local governments, during the initial scenario planning phase of the target setting process. In addition to consulting with MPOs regarding target setting, we request that ARB meet with local governments as directed by Government Code 65080(b)(2)(A)(iv) to determine what local jurisdictions believe they can reasonably achieve.

#### **Updating Targets**

Under existing law (Gov't Code section 65080), ARB is required to update the regional greenhouse gas emission reduction targets every eight years. The law recognizes that if there are changes in the factors upon which the original targets were based, then the targets may be updated every four years. The factors are: greenhouse gas emission reductions that will be achieved by improved vehicle emission

standards, changes in fuel composition, and other measures it has approved that will reduce greenhouse gas emissions in the affected regions. The League would like to emphasize that any change in targets should be tied to the changes in these factors. While some of these changes have occurred, it is uncertain whether these changes have taken place statewide or only in certain MPO regions. We have not yet seen information that supports revision in the targets within the four-year time frame based upon changes in these factors.

### **Indexing Targets**

As stated in the Preliminary Draft Staff Report, SB 375 specifies that the ARB, working in consultation with the MPOs, provide each region with a greenhouse gas emission reduction target for the automobile and light truck sector for 2020 and 2035. While it may be appropriate to establish a mid-term emissions target that aligns with the state's long-term objective of continued emissions reductions at some point for future target updates, doing so at this time is not appropriate. Establishing a state mid-term emissions target should be based on a bottom-up process with public input and stakeholder consensus, similar to the way SB 375 was negotiated rather than the top-down approach of an Executive Order. Executive Order S-3-05 sets a greenhouse gas emission reduction target of 80 percent below 1990 emissions by 2050. The Executive Order is a goal and not a mandate. If ARB chooses to use the goal to "inform" future SB 375 target setting, this changes the policy to a mandate. Therefore, the League is opposed to the establishment of a state mid-term emissions target of 80 percent below 1990 levels by 2050 at this point in time.

### **Metric for Reduction Targets**

SB 375 delegates the authority for choosing the metric by which greenhouse gas emission reduction targets will be measured to the ARB. The existing adopted targets are expressed in percent reduction in per-capita GHG emissions relative to a 2005 base year. While ARB has the authority to change the metric, the Preliminary Draft Staff Report points out that maintaining the current metric makes it easier to compare GHG reduction against future SCSs. Consistency in the metric also allows for comparison from one region to another. The League recommends retaining the per-capita GHG emissions metric as well as the 2005 base year both for consistency reasons and comparison purposes.

### **Uniform vs. Specific Targets**

The League of California Cities opposes the creation of a single, uniform target. While determining a uniform target might save staff time in short run, it may prove pound foolish. Given the state's diversity and the fact that not all regions are equal with regards to resources, population, and alternative transportation, it would less informative to create a one-size-fits-all target.

### **Increasing Numeric Targets**

The Preliminary Draft Staff Report states that "Establishing more stringent targets would *theoretically* further reduce GHG emissions from more aggressive land use and transportation strategies but would need to be accompanied by additional resources for SCS implementation..." The League encourages ARB to continue to work with MPOs and use the consultation process to collect the input from MPOs about what the MPOs believe they can reasonably achieve. The League opposes establishing more stringent targets on the basis that it "might" reduce GHG emissions without evidence from the consultation process with MPOs that more stringent targets "will" reduce GHG emissions.

### **Timing of New Targets**

The League urges that the timing of any new targets be done at the beginning of a new round of SCSs so that all regions are on the same footing and so that comparison can be more easily accomplished. As noted in the Preliminary Staff Report, not all of the 18 MPOs have adopted the first round of SCSs and ARB has only completed seven evaluations to certify that the adopted SCSs meet the target. Given the

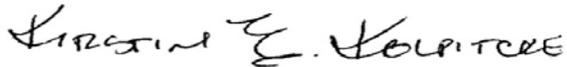
extensive preparation and years of work that goes into adopting an SCS, regions should know well in advance when the goal line is going to be changed.

### **Funding**

Proposition 84 funding for Sustainable Communities Planning and Urban Greening Grants has been exhausted as of this year. The Preliminary Draft Staff Report notes that the FY 2014/15 State Budget has allocated \$130 million in cap-and-trade revenues for the implementation of sustainable communities and affordable housing projects. While the League is encouraged that the Legislature has devoted some funding to implement SCSs, there are several places in the draft that mention the link between the outcome and funding. As ARB considers the various factors that could change with an updated target, it would be prudent to keep in mind the cost. For example, the staff report indicates that model enhancements range widely in complexity and cost and that the more sophisticated activity-based model, while more detailed, is more complicated and costly for MPOs to set up and run.

Again, thank you for the opportunity to comment on the SB 375 Regional Targets Update Process. Please do not hesitate to contact me should you have any questions at (916) 658-8250 or [kkolpitcke@cacities.org](mailto:kkolpitcke@cacities.org). We look forward to continuing our valuable relationship with ARB.

Sincerely,

A handwritten signature in black ink that reads "Kirstin E. Kolpitcke". The signature is written in a cursive style with a large initial "K".

Kirstin Kolpitcke  
Legislative Representative

# Transportation Solutions Defense and Education Fund

P.O. Box 151439 San Rafael, CA 94915 415-331-1982

October 10, 2014  
By E-Mail

Mary Nichols, Chair  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Re: Regional Target Setting Update

Dear Chair Nichols:

TRANSDEF, the Transportation Solutions Defense and Education Fund, would like to offer you our thoughts in preparation for your Board's consideration of an update of the regional GHG emissions reduction targets:

Alarming, regional GHG emissions are increasing, despite the legislative intent of SB 375 to generate additional reductions beyond those achievable with statewide measures. It should be clear that the 2010 regional targets are not achieving what they were mandated to accomplish. Given that, TRANSDEF urges the Board to order the regional targets to be updated.

## Is there a Climate Crisis?

TRANSDEF is conversant with the long-term consequences of having 400+ ppm CO<sub>2</sub> in the atmosphere. We anticipate catastrophic conditions for the next generation if our generation's response is inadequate. We are among a disappointingly small group of advocates that recognize that the human race is in a climate crisis. By its actions, ARB appears to us to not share our sense of looming crisis.

The *Preliminary Draft Staff Report on the SB 375 Greenhouse Gas Reduction Target Update Process* lacked any sense of urgency. As a result, it asked the wrong questions. The Roundtable process also lacked a sense of urgency. Participants there seemed far more concerned that interregional travel not impose a responsibility for VMT reduction.

It seems to us that the first step in deciding the Board's preferences on regional targets needs to be to decide "Are we facing a climate crisis?" The comprehensiveness of the response will depend on the degree of crisis perceived.

## The Bottoms-Up Approach

We think you need to reconsider the 2010 decision to use a bottoms-up approach, as it is not working. No transportation agency we are aware of has yet acknowledged that

climate change is its problem. They all act as if some other agency--most likely ARB--is going to take care of the problem, and leave them out of it. They see no need to change their practices, and are truly oblivious to the GHG consequences of continuing to facilitate solo driving.

We have recently been involved in several counties' transportation plans. Alameda adopted a plan with a 46% increase in VMT. While the plan claimed to reduce per capita GHGs by 24%, upon close examination, that claim relied entirely on Scoping Plan measures. When they were removed from the calculation, the plan will result in a **31% increase** in per capita GHGs. Contra Costa is currently workshopping a plan with a 35% in VMT, which will result in a **5.5% increase** over current per capita GHG levels.

As if these trends are not troubling enough, MTC recently adopted a revised set of Guidelines for Countywide Plans (in response to a lawsuit by advocates). The draft Guidelines called on counties to look to the regional goals expressed in the Sustainable Communities Strategy. In a strong pushback by local jurisdictions, the Guidelines were amended to make them even more explicitly voluntary than Guideline inherently are. Without strong state direction, local agencies will continue to insist on maintaining Business as Usual, and ignoring their responsibility for climate change.

These plans are clearly heading in the wrong direction. The setting of new regional targets would send an important message to transportation agencies across the state, waking them up to the realities of climate change.

#### The Top-Down Approach

The recent SB 375 Implementation review avoided the question of the cumulative statewide emissions reductions resulting from the regional targets. Buried in an obscure ARB publication was the calculation that the SB 375 program will produce reductions of 3 MMTCO<sub>2e</sub>, where the 2008 Scoping Plan had a placeholder target of 5 MMTCO<sub>2e</sub>.

The 2008 Scoping Plan did not identify enough measures to meet the target statewide emissions reduction, so falling behind with this program is potentially serious. Since that time, climate science has advanced, making it clear that larger reductions are needed, and needed sooner than previously thought, as the models had been overly conservative. Given these developments, it should be clear that the state needs to achieve greater emissions reductions from the regional targets.

This is why a top-down approach is needed: ARB needs to use the best science available as its starting point, and work its way backwards to what is needed to achieve a statewide target by the jurisdictions that approve land use and transportation projects.

#### Conclusion

The MPOs have made it clear on multiple occasions that they oppose a new round of target setting. That is hardly a surprise, as MPOs are inherently averse to change and to mandates. They are not leading the fight to protect the climate.

The challenge for Board members now is the question "Are we facing a climate crisis?" When each member is able to answer it in a way that they could feel comfortable defending to future generations, ARB will be ready to make wise policy decisions.

We would be pleased to answer any questions you might have, at the phone number above.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,  
President

#### Appendix

The following points, which we submitted to ARB in 2010 for the first target setting, are still relevant to today's update:

1. We find it unimaginable that the Draft Targets report did not identify the aggregate effect of the proposed targets. The answer to the question "will we accomplish our Scoping Plan goals with these targets?" should have been central to the process. The targets are useless, or even counterproductive, if they are not directly tied to the Scoping Plan. (Please note that we are not intruding into the RTAC's recommendation on how the target is to be expressed at the regional level--we refer here to tying the statewide total emissions to the Scoping Plan.)
2. **Only a top-down process that results in a regional target that is tied to a statewide plan to accomplish the Scoping Plan's goals can provide sufficient justification for making uncomfortable policy decisions at the local level. Locals need this backup.**
3. The undersigned was an active participant in the Working Group that revised the CTC's RTP Guidelines in response to the adoption of SB 375. Throughout that process, we expected ARB to allocate the regional targets so as to achieve statewide targets. That was not the case with the Draft Targets.
4. ARB staff mentioned several times today that the targets need to have "a sound technical basis." Please be aware that the MPO submissions which became the basis for the draft targets are already strongly colored by political judgment.

5. We observe with dismay that the absence of a statewide emissions total in the draft targets report strongly implies that the target setting process has been turned into a politicized process that caters to the MPOs' desire to minimize their targets, rather than a process with "a sound technical basis."
6. We notice the acquiescence of the Draft Targets report to the notion that because land use effects are long-term, that it is logical that the 2020 targets be lower than the 2035 targets. This approach completely ignores the realm of pricing measures which can be implemented very quickly. Note the absence of pricing in: "This range is based on the potential reductions from land use and transportation planning scenarios provided by the MPOs." (p. 3, Draft Targets report.)
7. We associate the absence of a discussion of the feasibility of pricing with the lax national attitude to what we understand to be a pressing emergency. Scientists inform us that there are only a few years left to correct our emissions overhang before irreversible changes take place. We call on ARB to use the best science to recognize the urgent need for early reductions, which would require strong leadership to educate the public about the need for increased pricing of driving.
8. Similarly, it is solely a function of the public's lack of understanding of the threat of climate change that "extremely aggressive policy scenarios ... could not realistically be implemented." (p. 4, Draft Targets report.) Once peacetime America was attacked, it rapidly geared up to fight World War II, and endured great privation for the public good. The Draft Targets report clearly expresses a lack of resolve for the kind of societal mobilization that we believe is called for by climate science.
9. We reject the idea that lower, more achievable, targets are a wise idea. We don't have 10 or 20 years to build confidence. Unfortunately, climate is not a problem that can be responded to at a pace that is comfortable for government.
10. We agree that target setting should include the provision of a margin of safety, as is commonplace in the setting of health-based criteria pollutant standards.
11. The very fact that the San Joaquin Valley is expected to grow so much means it can realistically handle a much higher target. Would it really be acceptable for the Valley to actually increase its GHG emissions (or even keep them level, with Pavley)? Giving the Valley an aggressive target will encourage the use of Best Practices for new development. It is crucial to not squander the opportunity to reshape settlement patterns. This will bring substantially lower future emissions.
12. Page 3 of the Draft Targets report uses the phrase "improving the efficiency of each region's existing transportation network." This is the current Caltrans euphemism for widening highways. Current research indicates that while highway widening may have congestion relief benefits in the short-term, in the long-term such projects induce further demand, resulting in increased trips, longer trips, and increased VMT and GHG emissions. (citations available.) We urge ARB to avoid this phrase, as well as the transportation planning strategy that underlies it.

September 29, 2014

Lynn Terry  
California Air Resources Board  
Sacramento, CA

Dear Ms. Terry,

As CARB deliberates key issues in the SB 375 target update process, we urge you to integrate social equity factors in this process. We also strongly recommend that SB 375 GHG reduction targets in the San Joaquin Valley be strong enough to foster ambitious land use and transportation policies that reduce GHG emissions. We believe that having a stronger emphasis on equity and more ambitious targets in the Valley is critical to achieve success in SB 375 implementation and a healthier and more sustainable future for all communities.

Prior to the first round of Sustainable Community Strategy implementation, the Regional Targets Advisory Committee (RTAC), in its recommendations to CARB, identified “maximum social equity” as a guiding principle of target-setting.<sup>1</sup> CARB and the MPOs should continue to take tangible steps to ensure that social equity is an integral component in the target setting process. As indicated in the recent CARB Preliminary Draft Staff Report, “ARB could consider how revising the GHG emissions reductions targets could incentivize development of SCSs that provide a broad range of community and environmental benefits.”<sup>2</sup> CARB should not only emphasize the equity benefits in the update of SB 375 targets, but also provide strong guidance to MPOs.

Elevating these factors in the target setting process is critical for regions to achieve their GHG reduction targets. Increasing affordability of housing and transit and improving jobs-housing fit results in more workers at all income levels living closer to their jobs, and thereby reducing vehicle miles traveled (VMT).<sup>3</sup> A failure to plan for social equity, on the other hand, could result in greater displacement of low-income families, segregating them to the geographic peripheries and forcing them to commute in the cheapest and highest polluting vehicles or on unaffordable and inefficient transit systems.

As CARB consults with MPOs to establish the GHG reduction targets, we request that you take the steps listed below to integrate social equity into this process:

- 1) Develop a standardized set of social equity metrics that will be incorporated into the current and future cycles of GHG target-setting and SCS development. Examples of social equity metrics include:
  - Availability of affordable housing;
  - Accessible, affordable transit options;
  - Jobs-housing fit, which quantifies the relationship between wages and housing costs to measure whether people of all income levels have the opportunity to live near their jobs;

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<sup>1</sup> Recommendations of the Regional Target Advisory Committee (RTAC) Pursuant to SB 375, Sept. 2009, p. 3.

<sup>2</sup> [http://www.arb.ca.gov/cc/sb375/pre\\_draft\\_target\\_update\\_sr.pdf](http://www.arb.ca.gov/cc/sb375/pre_draft_target_update_sr.pdf), p. 16

<sup>3</sup> “The affordability of housing and transportation and access to employment play a critical role in determining where Californians live, how much they travel and, therefore, directly affect the level of achievable greenhouse gas reduction.” RTAC Report, p. 28

- Air quality impacts (avoiding disproportionate impacts on low-income communities);
  - Anti-displacement measures;
  - Access to employment at appropriate income levels, and to other community amenities;
  - Focused investment on existing communities, both urban and rural.
- 2) Identify CARB resources, including research grant and funding opportunities, that can be directed to research and model development necessary for the incorporation of social equity factors into the target setting process.
  - 3) Provide guidance to the MPOs on how to address and avoid adverse social consequences (including displacement, gentrification, disinvestment in existing communities, and increased housing costs) in their SCSs.
  - 4) Develop a set of social equity indicators that can be used for performance monitoring of the changes that result from SB 375 implementation in each region.
  - 5) Facilitate robust community participation in the target setting process across regions. In Fresno, for instance, community attendance at public workshops was ensured by providing micro-grants to community partners to host these meetings.
  - 6) When the ARB Board takes action to adopt SB 375 targets, that resolution should include a commitment to undertake each of these steps.

By establishing the above social equity indicators and strategies, CARB will not only do its part to prevent further economic and social segregation, but also enable policymakers to clearly see the wide range of benefits of SB 375 implementation. Furthermore, the review of each SCS should include an analysis of how low-income communities and communities of color will be impacted, and an examination of whether greenhouse-gas reducing social equity policies have been included.

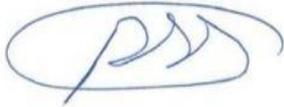
Strengthening SB 375 targets in the Valley should be another high priority for CARB. We strongly urge CARB to revisit these targets in time to apply to the Round 2 Regional Transportation Plans, which relied on “placeholder” targets in the first round. Given the Valley’s air pollution problems—among the worst in the country—and correlated health impacts, it is incumbent upon CARB to set ambitious targets for the Valley’s COGs. Furthermore, the Valley is one of the fastest growing regions in the entire state and home to some the nation’s most disadvantaged communities. If CARB adopts conservative targets in the Valley, several of the community benefits of SCS planning as listed in the Preliminary Draft Report—including improved public health, air quality, open space and resource protection—will be limited in the Valley.

We are aware that the original targets for the San Joaquin Valley COGs were relatively arbitrarily set as 5% and 10% for 2020 and 2035. Several of the Valley’s COGs are projected to exceed these targets by a wide margin with their “Business as Usual” scenarios. Additionally, some of the COGs met their targets before the beginning of the planning period. Our engagement in SCS development in Kern, Tulare, Fresno, Madera and Merced demonstrated the relative ease by which MPOs met the placeholder targets. In many of these places, the lack of innovative land use and transportation policy changes coupled with limited political will resulted in projected patterns of development that only slightly deviated from the norm. New town development, new growth on the fringes of existing cities and transportation projects aimed at facilitating new growth – a historic theme in the Valley – permeated throughout the process. The new targets adopted by CARB the Valley should be achievable by ambitious changes to land use and transportation policy that helps to achieve our climate goals, not from assumption such as gas price increases. Our 2020 and 2035 SB 375 targets should be sufficiently strong to ensure all pollution reduction programs together will achieve the 2050 goals of 80 percent reductions below 1990 levels. Strengthening the targets in the Valley is

critical to ensure that the state meets its GHG reduction goals. Review of Valley SCS methodologies in the coming months will inform this process. We look forward to learning from this process to establish ambitious targets and integrate social equity factors.

We urge you to take concrete steps to work with advocacy groups, partner agencies, the public, and other stakeholders to integrate social equity into the SB 375 target setting process, and to adopt ambitious GHG reduction targets for the Valley.

Sincerely,



Phoebe Seaton  
Co-Director  
Leadership Counsel for Justice & Accountability



Judith Bell  
President  
PolicyLink

