

Transportation Solutions Defense and Education Fund

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

December 22, 2017

By E-Mail

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: December 14 Regional Targets Hearing

Dear Chair Nichols,

The day after your hearing on Regional Targets, I received a link to a blog (attached) on a study about the effects of SB 375. The entire tenor of the hearing would have shifted, had this information been available before then.

The recent study by the [National Center for Sustainable Transportation](#) has concluded that SB 375 has not affected local land use decision-making. TRANSDEF requests that you assign the SB 375 team to review the study and report back to the Board.

The blog's commentary on the study concluded that "SB 375 provides some conceptual underpinnings and data to support these newer laws. But without any direct tie to local decision-making, SB 375 as it currently stands will not by itself solve California's land use and transportation challenges."

TRANSDEF disagrees. We believe that SB 375 has not affected land use decision-making because regional targets had been set low enough that MPOs could produce qualifying SCSs without actually producing the mode shift that indicates functioning TOD. We believe SB 375 will produce change, if ARB implements the targets properly.

If ARB sets targets high enough that MPOs cannot show an adequate emissions reduction under status quo land use practices, they will be forced to use a bigger carrot-and-stick to influence local land use decisions. We suggest they require county plan consistency with their SCS as a requirement for having projects listed in the RTP. This indirect tie will make SB 375 work. Because the regional targets were set too low, SB 375 hasn't worked so far. Now is the time to fix that.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn, President