



California Air Resources Board
1001 I Street
Sacramento, CA

RE: sb375update2017
submitted electronically via: <http://www.arb.ca.gov/lispub/comm/bclist.php>

July 28th, 2017

Re: Sacramento Region SB 375 Greenhouse Gas Emission Reduction Target Update

Dear Chair Nichols, Air Resources Board Members, and Staff:

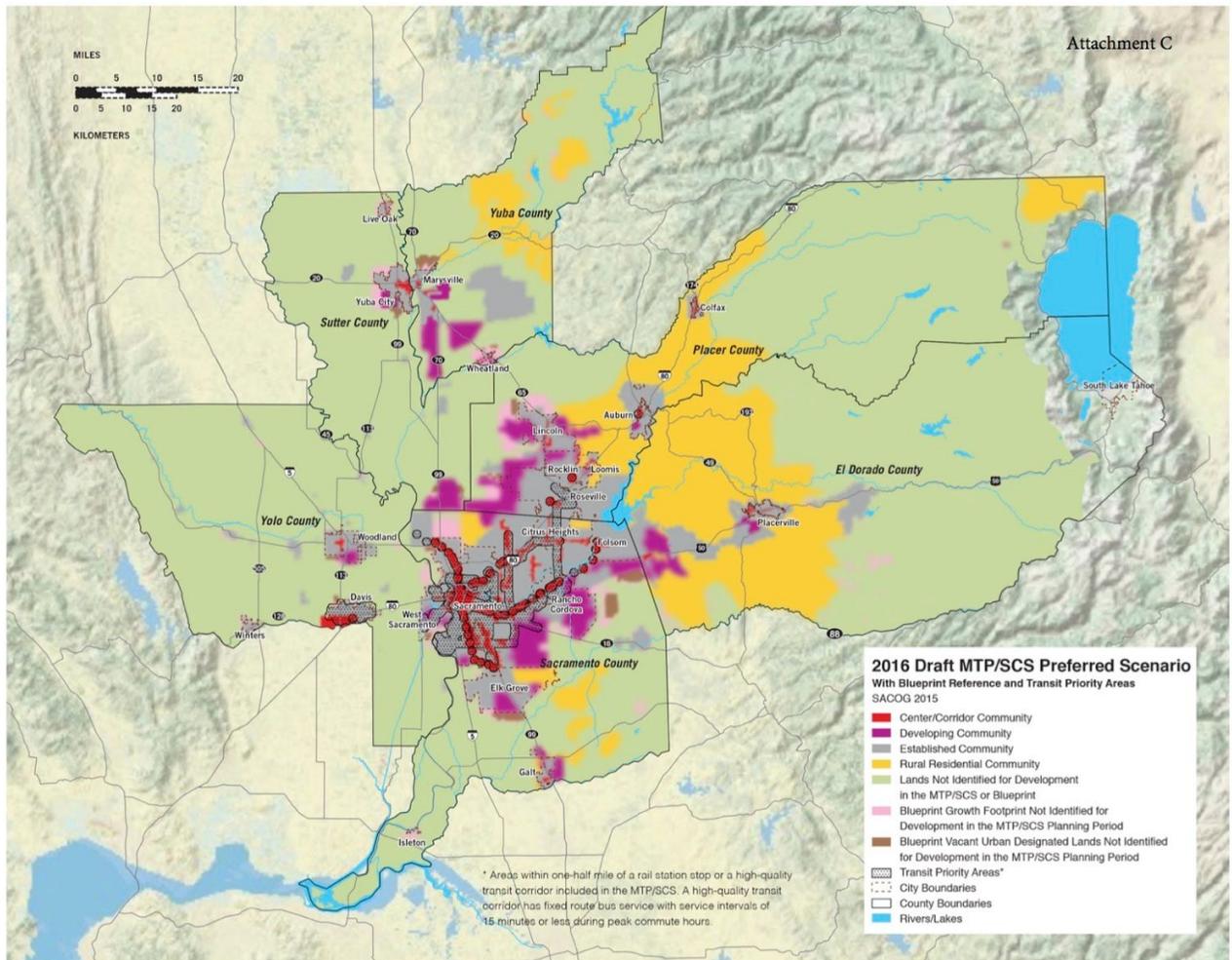
In 2004, the Sacramento Area Council of Governments (SACOG) adopted the Blueprint. This plan provided vision for how the region would integrate land use and transportation planning to curb sprawl, reduce vehicle emissions, and cut down on traffic congestion to improve quality of life. This is to be accomplished by encouraging a sufficient variety housing options close to jobs, schools, and other critical community amenities. The adoption of the Blueprint—and subsequent Metropolitan Transportation Plans/Sustainable Communities Strategies (MTPs/SCSs)—has made SACOG a leader in the state and the nation in its efforts to reduce greenhouse gas emissions (GHG) and vehicle miles traveled (VMT), and build more equitable communities.

While we support the recently adopted MTP/SCS, we also believe there is tremendous room to improve the plan. We believe that neither the SB 375 target recommendations made by SACOG staff (-18%) or Air Resources Board (ARB) staff (-19%) represent the full GHG reduction potential from improved land use and transportation behavior in the Sacramento region. Considering the substantial amount of greenfield development anticipated in the current SACOG MTP/SCS and the extremely low densities of the existing urban footprint, we feel that a stronger GHG reduction target is very feasible.

The constraints to SACOG's ability to adopt a more compact growth footprint and further prioritize investments to non-auto modes of travel are largely political, not physical. Stronger

targets can also provide much needed information to our region’s leadership on the types of housing investments and actions needed to maximize our GHG emission reduction goals.

We understand that the political constraints, such as lack of will by local jurisdictions to align their planning to achieve California’s climate goals, are very real constraints. We do not believe these constraints should excuse SACOG from a less-than-physically-feasible reduction target. As SACOG lacks land use authority, only a strong directive from the State will help reinforce the need of the region’s respective jurisdictions to alter their current growth behavior.



The reality that SACOG faces is that the general plans of the region cumulatively plan for more than twice as much growth; the total build-out of these cumulative General Plans anticipates over 660,000 housing units beyond 2012 stock—well more than twice the MTP/SCS estimate of 285,000.

Jurisdiction/Community Type	Existing Conditions		Draft Preferred Scenario		Build Out Estimate		Difference	
	Total in Year 2012		Total in Year 2036		Total at Build Out		Build Out minus Projected Year 2036	
	Jobs	Housing Units	Jobs	Housing Units	Jobs	Housing Units	Jobs	Housing Units
Region Total	887,965	903,451	1,327,323	1,188,347	2,234,929	1,564,662	907,606	376,315
Center and Corridor Communities	307,652	107,718	459,750	193,885	633,282	236,212	173,532	42,327
Established Communities	527,095	686,075	742,211	764,825	1,018,936	805,215	276,725	40,390
Developing Communities	20,037	31,422	88,922	146,258	365,796	281,782	276,874	135,524
Rural Residential Communities	33,181	78,237	36,441	83,380	64,341	117,802	27,900	34,422
Areas Not Identified for Growth in the MTP/SCS by 2036					152,574	123,650	152,574	123,650

Data drawn from SACOG Housing Forecast, April 9th, 2015 staff report, p. 56

By any measure, the growth is not being planned in the areas it is most appropriate for addressing GHG targets and equity goals. Per the diagram above, more than half of these new units would be located in previously undeveloped "greenfields", with more than 2 times the growth in SACOG's (magenta) "Developing Community" areas and 8 times more growth in the (yellow) "Rural Residential" areas. Further, there are currently multiple expansion proposals in the region that would bring significant peripheral growth far beyond what is represented by these numbers.

To be clear, we understand the need and desire for greater housing production at every income level in the region. The problem is not the number of units. The problem is the expansive low-density growth footprint that is proposed by the region's general plans. These low density proposals come at a time when our region is already struggling to meet our climate goals, and existing communities are consistently calling for investment in their neighborhoods.

Through great leadership, technical expertise, and diligent outreach, SACOG has been able to develop and adopt a compromising regional strategy that significantly reduces the growth footprint of the region's existing general plans—and we applaud this effort. Yet the current MTP/SCS footprint still anticipates 42% of growth in greenfield development. Current residential densities in the existing urban footprint are so low that even if all the anticipated growth of SACOG's plan were directed entirely within the existing footprint, the region would still only begin to approach true transit-friendly densities.

To demonstrate, ECOS presented some calculations in their comments on the 2016 MTP/SCS Update to provide rough estimates of the densities that could be achieved by a strategy of directing growth solely into already developed portions of their "Centers and Corridors" and "Established Communities." Assuming all anticipated growth is equally divided between these two categories (increase of 142,448 Dwelling Units in each), this strategy would push the gross residential density in Established Communities to 3.1 DU/Gross Acre (4.9 DU/Net Residential Acre) and 9.4 DU/GA (24.4 DU/NRA) in Centers & Corridors. Even in this extreme all-infill scenario, the densities in Established Communities are still not high values for transit-oriented

density, and those in Centers/Corridors still fall short of densities achieved in both San Francisco and Los Angeles. These numbers represent densities for the area SACOG deems “developable” in the existing footprint; 75% of the existing footprint is not developed. The average anticipated growth over the total acreage of the existing footprint (parks, roads, etc.) the density is only *.5 DU/GA*.

Given this tremendous capacity for growth in existing urban areas, nothing less than an all-infill scenario warrants development and analysis for the SACOG region. Local and statewide advocates have urged ARB and the MPOs to develop extreme land use/transportation investment scenarios that are politically unconstrained from their jurisdiction’s General Plan, but remain fiscally constrained to current revenue presumptions to develop a scientific reference point for what is physically possible from improved land use. Further, we hoped to see an illustration of what savings could be made from not building infrastructure for the current more expansive SCS footprint, and what performance could be gained from folding those savings back into increased investment in existing urban areas.

Providing such an analysis of what is possible through increased densities and minimizing (if not eliminating) greenfield development could provide a very powerful reference point for informing ARB’s 375 target setting and future VMT reduction efforts. While the analysis that SACOG has provided in their “stress test” target recommendation report is informative in many ways, it does not illustrate this scientific base-line. SACOG chose to run their stress tests on the Alternative 3 of their adopted 2016 MTP/SCS, an alternative that still has 37% of projected growth in greenfield development, and determine a -18% GHG reduction target was the most that could be achieved. We do not believe this represent an ambitious analysis of what is actually possible from a more compact growth footprint and a reprioritization of transportation investments in the region. Recognizing that there are indeed other outstanding challenges, based on the proportion of greenfield development of the current plan and the tremendous capacity for growth in existing urban areas illustrated above, we recommend ARB adopt a SB 375 GHG reduction target of -22%, which is both reasonable and feasible for the Sacramento Region. This target is aggressive, but it is also reachable and necessary.

Make every effort to curb displacement in low-income communities in the Sacramento Region. The reduction of VMT from improved land use and non-auto transportation accessibility is disproportionately important compared to other GHG reduction mechanisms because of the great co-benefits to natural resource conservation, public health and social equity that improved land use behavior can provide. However, one of the primary *physical* constraints to the Sacramento region’s ability to realize these co-benefits *and* achieve our climate goals is the rapid displacement of low-income communities.

If appropriate measures are not taken, there can be an inherent conflict with focusing growth towards transit-oriented infill development, the rising property values, and preserving affordable housing. We are witnessing this conflict in the urban core of Sacramento, where property values and rental pricing have been rising very rapidly in recent years. While we understand the data delay in the MTP/SCS, we fear that gentrification and displacement are accelerating in region's most transit-oriented areas faster than the data can capture. Median

rent in Sacramento County has increased 18% since 2000, while median renter household income decreased 11%, when adjusted for inflation; double-digit increases are projected to continue in 2017. In fact, data released by RealPage in June 2017 show that rent is rising faster in Sacramento than anywhere else in the nation.

During recent community forums on the inclusion of environmental justice in General Plan elements, existing residents of neighborhoods such as Valley Hi, Oak Park, and Southeast Sacramento expressed deep concerns about a lack of new housing construction in their communities, housing affordability, and the increasingly rapid displacement of their communities due to a lack of housing that meets their needs. In these and communities like them all over the region, a lack of affordable home development, preservation, and rehabilitation of existing affordable homes represents a significant barrier to climate goals as well as both economic and social justice. This displacement represents a disruption of communities, leading to fragmented social support networks, a risk of homelessness, and increased greenhouse gas emissions as commute times lengthen. We want to ensure these growing communities thrive but not at the expense of the original residents.

This is a challenging concern, both for social equity considerations and achieving our climate goals. We know lower income residents walk, bike or use transit more if it is an available option. SACOG's MTP/SCS Table 8.3 shows 2012 low-income-high-minority communities (LIHM) in the Sacramento Region were using transit more than twice as much the rest of the region and made 50% more by bike/ped trips. When living within ½ mile of transit, lower income households drive 25-30% fewer miles; when living within ¼ mile of frequent transit, they drive nearly 50% less (California Housing Partnership Corporation & TransForm, 2014). When lower income households are displaced from areas served by transit, they are replaced by higher income households who drive twice as many miles and own more than twice as many vehicles as extremely low-income households living within ¼ mile of transit (California Housing Partnership Corporation & TransForm, 2014). Inversely, displaced lower-income resident that would have used transit are now forced to drive longer distances, likely in older, inefficient vehicles. Unless homes in transit-rich areas are kept or made affordable, the compact housing development patterns and increased transit service detailed in the SCS cannot realize their full potential in terms of VMT reduction, the primary driver of GHG reduction and farebox recovery.

SACOG has, and continues to work to develop, the tools needed to inform decision-making on these issues, but the responsibility resides heavily with the local jurisdictions to take the appropriate measures to protect and increase affordable housing in transit rich areas. However, we believe a higher SB 375 GHG reduction target is necessary to help ensure that our disadvantaged communities are not further displaced to peripheral greenfield development. A more compact growth footprint demanded by a stronger SB 375 target benefits all of our communities.

In closing, California will certainly reduce a greater proportion of GHG emission from other sectors through, cleaner energy, increased energy efficiency, and electrification of vehicles than it will from SB 375. Yet, as stated above, reduction of VMT-related GHG emissions through improved land use and transportation behavior is disproportionately important due to the

many environmental and social co-benefits that come with that improved land use. The Air Resources Board's own Scoping Plan analysis currently underway has clearly demonstrated that the GHG reductions from better energy and better vehicles alone will not achieve our climate goals. We need an additional 15% of GHG reduction from the reduction of VMT beyond current SCS targets. Stronger SB 375 implementation is the best tool we have in place to fill that VMT gap. Again, due to the great capacity for much denser growth within the existing urban footprint of the region, we recommend ARB adopt a -22% target, which is both reasonable and feasible. Lack of local political will should not be an allowable excuse given the aggregate benefits (and co-benefits) of an aggressive, but reachable, target. We must be aggressive, and while we applaud SACOG for what they've accomplished thus far, the Sacramento region can and must do better.

Thank you for this opportunity to comment.

Sincerely,

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