



September 23, 2024

Dr. Steve Cliff  
Chief Executive Officer  
California Air Resources Board  
Sacramento, CA 95814

**Re: Pause Current SB 375 Targets and SCS Guidelines to Allow a Holistic Review of SB 375 Framework**

Dear Dr. Cliff:

The Central Coast Coalition requests the opportunity to partner with the California Air Resources Board (CARB), California Transportation Commission (CTC), Caltrans, and the Department of Housing and Community Development (HCD) to holistically review the SB 375 Framework to improve how state and regional agencies collaborate to deliver multiple housing, climate, and transportation goals. The Coalition comprises the Metropolitan Planning Organizations and Regional Transportation Planning Agencies for California's Central Coast.

**SB 375 Provides A Foundation from Which the State Can Move Forward**

At the outset, we note that SB 375 has changed regional transportation planning for the better. With each new iteration of the SCS, we have seen better integration of land use, housing, and transportation policies, supporting better climate and quality of life outcomes for our residents. Importantly, the public has become more involved in developing these plans, resulting in projects more responsive to our communities' needs. This progress should be a foundation for further improvements in the state and regional planning framework.

**But The Time Is Right to Revisit the SB 375 Planning Framework Holistically**

A lot has changed since SB 375's adoption in 2008. The state has accelerated transportation electrification through Advancing Clean Cars II so that almost one in four new cars sold is zero emission. Under SB 743, vehicle miles traveled have replaced level-of-service as a critical success metric for transportation projects large and small. The state has also adopted substantial legislative changes to address the housing crisis. In addition, the global pandemic fundamentally altered travel patterns and land use preferences – creating unforeseen headwinds when the law was designed or when targets were last set by the CARB Board.

Thanks to state programs to support affordable housing and sustainable communities, active transportation, and transit improvements, as well as the Regional Early Action Planning (REAP) program, partial funding is available to support critical housing and transportation needs needed to achieve our ambitious goals. However, as the SB 150 report acknowledged, funding and staffing for implementation remains far short of what is needed to implement these regional plans fully. A restructured planning process can shift the focus toward implementation, delivering faster and more effective results.

**Request to Conduct a Holistic Review of the SB 375 Framework**

We request that CARB, CTC, Caltrans, and HCD work with MPOs to evaluate the SB 375 framework comprehensively. This effort will require us to engage in a deep and effective dialogue about the best way to achieve the suite of state and regional housing, climate, and transportation-related objectives, including reducing GHG emissions. As part of this request, we ask that CARB



## Central Coast Coalition

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pause the current SCS guidelines and SB 375 targets to allow for a robust and collaborative conversation about the best path forward in the coming months.

To demonstrate our commitment to this concept, this letter represents the collective submission of comments by the undersigned MPOs and RTPAs for both the proposed amendments to the SCS guidelines (comments requested by CARB by August 30th) and the request for information related to the target setting (preliminary data questionnaire requested by CARB by October 30th). The time is right to develop more robust implementation solutions that fit state, regional, and local objectives. Thank you for your consideration.

Sincerely,

Marjie Kirn, Executive Director  
Santa Barbara Association of Governments

Pete Rodgers, Executive Director  
San Luis Obispo Council of Governments

Todd Muck, Executive Director  
Transportation Agency for Monterey County

Sarah Christensen, Executive Director  
Santa Cruz Co. Regional Transportation  
Commission

Binu Abraham, Executive Director  
Council of San Benito County Governments

Maura Twomey, Executive Director  
Association of Monterey Bay Area Governments

Cc: Tomiquia Moss, Secretary, California Business, Consumer Services and Housing Agency  
Toks Omishakin, Secretary, California State Transportation Agency  
Sam Assefa, Director, Office of Planning and Research  
Tony Tavares, Director, California Department of Transportation  
Tanisha Taylor, Executive Director, California Transportation Commission  
Gustavo Velasquez, Director, California Department of Housing and Community Development  
Sarkes Khachek, Director of Programming, SBCAG