



September 27, 2024

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

Re: Pause Current SB375 Targets and SCS Guidelines to Allow a Holistic Review of SB 375 Framework

Dear Dr. Cliff:

The state's three smallest Metropolitan Planning Organizations (MPOs) request 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), along with the other fifteen California MPOs, to holistically review the Senate Bill 375 (SB 375) Framework to improve how state and regional agencies collaborate to deliver multiple housing, climate, and transportation goals.

SB 375 PROVIDES A FOUNDATION FROM WHICH THE STATE CAN MOVE FORWARD

At the outset, we note that SB 375 has changed the collaborative regional transportation planning process for the better. With each iteration after our first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) we have seen better integration of land use, housing, and transportation policies, supporting better transportation and quality of life outcomes for our residents. Importantly, the public has become more involved in the development of these plans, resulting in projects that are more responsive to our communities' needs. This progress can serve as 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, through the adoption of various policies and programs, has accelerated transportation electrification such that almost one in four new cars sold would be zero emission when fully implemented. Under SB 743, vehicle miles traveled has replaced level-of-service as a critical evaluation metric for transportation projects large and small. The state has also adopted substantial legislative changes to address a state housing crisis. In addition, the global pandemic fundamentally altered travel patterns and land use preferences – creating headwinds that were unforeseen 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, goods movement, maintaining facilities in a state of good repair, 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 ambitious state and regional goals. But as the SB 150 report acknowledged, funding and staffing for implementation remains far short of what is needed to fully implement these regional plans. A restructured planning process can shift the focus toward implementation and thereby deliver faster and more effective results.

WE REQUEST A COLLABORATIVE EFFORT TO CONDUCT A HOLISTIC REVIEW OF THE SB 375 FRAMEWORK

We request that CARB, CTC, Caltrans, and HCD work with the MPOs to comprehensively evaluate the SB 375 framework. 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 greenhouse gas (GHG) emissions, that is context appropriate for the state and each region. As part of this request, we ask that CARB pause the current SCS guidelines and SB 375 targets process 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 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 will fit state, regional, and local objectives. Thank you for your consideration.

Sincerely,



Andy Newsum
Executive Director
Butte County Association of Governments



Sean Tiedgen
Executive Director
Shasta Regional Transportation Agency



Nick Haven
MPO Director
Tahoe Regional Planning Agency

Cc: Tomiquia Moss, Secretary, California Business, Housing and Consumer Services
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 & Community Development