



Chair Mary Nichols and Members of the Air Resources Board
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95814

RE: SB 150 Metrics

March 13, 2018

Dear Chair Mary Nichols and Members of the Air Resources Board:

We—the undersigned—represent local, regional, statewide, and national organizations committed to reducing greenhouse gas emissions through equitable land use and transportation strategies. We appreciate the opportunity to provide input on the implementation of SB 150.

Regional plans developed per SB 375 cumulatively promise an 18 percent reduction in statewide GHG emissions below 2005 levels by 2035. ***SB 150 holds the key to ensuring that these anticipated GHG reductions are achieved.*** What gets measured gets done--by measuring the actual results of our Sustainable Communities Strategies (SCS) compared to the anticipated results, the State, stakeholders, and the public will know where we are succeeding and where we are falling short of meeting our GHG emission goals.

In the coming months, we want to partner with ARB to ensure successful implementation of SB 150. In this first step of crafting the SB 150 metrics, we offer the following recommendations:

- 1. Use the SB 150 metrics to track progress on achieving SB 375 targets by aligning metrics with anticipated results of SCS implementation.**

We appreciate ARB staff’s recent proposal to clarify how MPOs are planning to meet their SB 375 emissions reduction targets from land use and transportation strategies. Greater

transparency will help reveal exactly what changes are needed on the ground to meet the targets; we recommend using SB 150 to measure the progress on making these necessary changes.¹

For example, if greater transparency reveals that an RTP/SCS anticipates a mode share of 15 percent transit, SB 150 metrics can be used to measure progress on achieving that mode share. ARB already reviews the anticipated performance of a few metrics in the technical review of each RTP/SCS, but the information is irregular and buried in the technical appendices. We recommend simplifying and standardizing this review to make it more accessible and meaningful for the public and stakeholders. By aligning SB 375 and SB 150, measured progress could be directly compared to the anticipated progress.²

In addition to tracking progress on achieving SB 375 targets, we recommend including direct measures of what the MPOs are doing to achieve progress. Performance metrics, such as VMT and mode share, are important in making sure that investments, policies, and programs are effective in achieving the goals of SB 375. However, performance metrics such as VMT and mode share are influenced by many factors, including factors outside of the MPOs' influence. SB 150 provides an opportunity to focus on the funding and policy decisions for which MPOs are wholly responsible. In addition to MPO spending, these measures should evaluate the planning process and stakeholder engagement.

For example, recommended metrics include:

- A. MPO decision-making
 - a. Distribution of funding to road expansion, transit expansion, transit operations, bike and pedestrian projects, grants for land use planning and land conservation, affordable home construction, other
 - b. Amount of subgrants for community partners to perform outreach, if any
 - a. Number of RTP/SCS public meetings held with translation service, food, and childcare provided, if any
- B. Land use and Transportation
 - a. New road, transit, bicycle, and pedestrian infrastructure in lane miles
 - b. Percentage of housing within half-mile of high-quality transit³
 - c. Percentage of employment within half-mile of high-quality transit⁴
- C. Travel Behavior and Mobility

¹ Please see partners' comment letter dated March 12, 2018 regarding the Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets.

² For example, ARB's 2016 technical review of the SACOG MTP/SCS concluded that the plan would meet the targets, and supported this conclusion with an analysis of the plan's anticipated performance on land use and transportation indicators that have well-established correlations with emission reductions. The indicators used for SACOG's 2016 MTP/SCS included residential density, new housing product mix, housing and employment near transit, sub-regional jobs/housing balance, mode share, travel time to transit, daily transit ridership, and average auto trip length and passenger VMT.

³ Potential data source: American Community Survey; we recommend ARB develop a GIS layer of high-quality transit.

⁴ Potential data source: Employment Development Department; we recommend ARB develop a GIS layer of high-quality transit.

- a. VMT per capita⁵
- b. Commute mode share⁶

2. Include metrics that ensure the strategies to achieve SB 375 targets maximize social equity.

Communities of color and low-income communities are burdened by the legacy of discriminatory and segregationist transportation and land use policies. Unthoughtful implementation of emissions reduction strategies can exacerbate the existing inequities of our communities. The metrics selected should ensure that regional planning fairly meets the needs of low-income communities and communities of color, while reducing – not worsening – patterns of regional segregation and the risk of displacement. Failing to account for social equity runs the risk of unleashing a wave of gentrification and displacement in the urban core and along transit lines, excluding more lower-income families, segregating them at the geographic periphery and forcing them to commute in the cheapest and highest polluting vehicles or on unaffordable and unreliable transit systems. Providing the opportunity for everyone to drive less is both the fairest and the most effective way to reach our goal of reducing greenhouse gas emissions.

For example, recommended social equity metrics include:

- A. Number of new affordable units⁷
- B. Number of new of affordable units within a half-mile of high-quality transit⁸
- C. Average share of low-income residents' household income consumed by transportation and housing⁹
- D. Jurisdictions with Housing Elements in compliance¹⁰
- E. Jurisdictions with anti-displacement policies¹¹
- F. Racial composition of population in disadvantaged communities¹²
- G. Jobs/Housing fit¹³
- H. Rural mobility

3. Include metrics that ensure the strategies to achieve SB 375 targets yield health and conservation benefits.

Climate-friendly development brings significant health benefits: reducing driving reduces air pollution, and increasing walking and biking for transportation makes physical activity a part of

⁵ Data source: Highway Performance Monitoring System

⁶ Data source: American Community Survey

⁷ Potential data source: Department of Housing and Community Development

⁸ Potential data source: American Community Survey; we recommend ARB develop a GIS layer of high-quality transit.

⁹ Data source: Center for Neighborhood Technology H+T Affordability Index

¹⁰ Data source: Department of Housing and Community Development

¹¹ Potential data source: We recommend ARB develop a GIS layer of of jurisdictions with anti-displacement policies.

¹² Data source: American Community Survey, CalEPA)

¹³ Potential data source: American Community Survey, Employment Development Department

daily life. The health benefits from sustainable planning are potentially dramatic--according to ARB staff, "designing communities to promote increased physical activity can reduce risks from chronic diseases to such an extent that it would rank among the top public health accomplishments in modern history."¹⁴

In addition, sustainable development and natural resource conservation are mutually supportive--sustainable development makes it possible to conserve agricultural and natural resources, and directing new growth into existing communities without displacing current residents can prevent the conversion of natural and working lands. A growing body of research shows that conservation is essential to achieving GHG reductions, can bring billions of dollars into our state's economy, and contributes to food security, water availability, and water treatment.¹⁵

In contrast, some strategies that may be used to reduce greenhouse gas emissions, such as Intelligent Transportation Systems, do not yield the same health or conservation benefits. Although a diversity of strategies is required to meet our climate goals, the metrics can be used to track progress on strategies that result in benefits.

For example, recommended health and natural resource metrics include:

- A. Total pedestrian miles traveled¹⁶
 - B. Total bicycle miles traveled¹⁷
 - C. "Clean environment" index of diesel PM emissions, water contamination, ozone, and PM 2.5¹⁸
 - D. "Clean environment" index for households with an income under 200% the federal poverty level¹⁹ (to assess environmental justice)
 - E. "Healthy Neighborhood" index of park access, tree canopy, supermarket access, distance from liquor stores, retail access²⁰
 - F. Acres of important farmland and grazing land converted in past 4 years²¹
 - G. Acres of undeveloped land converted to developed land in past 4 years²²
4. **Encourage public engagement and meaningful dialogue through a simple list of actionable metrics.**

¹⁴ CARB Updated Final Staff Report Proposed Update to the SB 375 Greenhouse Gas Emissions Reduction Target,s February 2018.

¹⁵ For more information, see Sustainable Communities Strategies and Conservation: Results from the First Round and Policy Recommendations for Future Rounds (2016), available at <http://www.southernsierrapartnership.org/scs-policy-report.html>.

¹⁶ Data source: American Community Survey, CHTS, and MPO household travel surveys. See the California Bicycle and Pedestrian Plan Performance Measures

¹⁷ Data source: American Community Survey, CHTS, and MPO household travel surveys. See the California Bicycle and Pedestrian Plan Performance Measures

¹⁸ Data source: Public Health Alliance of Southern California's Healthy Places Index

¹⁹ Data source: Public Health Alliance of Southern California's Healthy Places Index

²⁰ Data source: Public Health Alliance of Southern California's Healthy Places Index

²¹ Data source: CA Department of Conservation Farmland Mapping and Monitoring Program

²² Potential data source: Collected from MPOs

We recommend crafting a list of metrics that is simple and easy to understand to encourage public engagement. There is a huge amount of data available, but more is not necessarily better. We recommend limiting the metrics to those that are most important to telling the story of SB 375 progress. In addition, we recommend organizing the metrics into focus areas that reflect our recommended approach to SB 150 implementation, as explained in this letter. For example, the focus areas could be: “MPO Decision-Making,” “Land Use and Transportation,” “Travel Behavior and Mobility,” and “Equity, Health, and Natural Resources.”

Thank you for your consideration. We look forward to partnering with you.

Sincerely,

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The Environmental Council of Sacramento

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