

**SANDAG**

Metropolitan Transportation Commission  
San Diego Association of Governments  
Southern California Association of Governments  
Sacramento Area Council of Governments

September 20, 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 state's four largest 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) to holistically review the 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 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 the development of these plans, resulting in projects that are more responsive to our communities' needs. This progress should be used as a foundation for further improvements in the state and regional planning framework.

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

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 has 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 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, 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. 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.

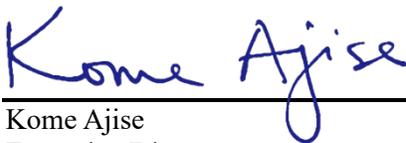
**Request to Conduct a Holistic Review of the SB 375 Framework**

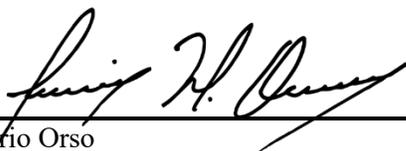
We request that CARB, CTC, Caltrans, and HCD work with MPOs to comprehensively evaluate the SB 375 framework. This effort will require us to engage in a deep and effective dialogue about the best way to achieve the suite of state and regional housing, climate, and transportation-related objectives, including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

  
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Executive Director  
Metropolitan Transportation Commission

  
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Executive Director  
Southern California Association of Governments

  
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- CC:
- Tomiquia Moss, Secretary, California Business, Consumer Services, and Housing
  - Toks Omishakin, Secretary, California State Transportation Agency
  - Sam Assefa, Director, Office of Planning & Research / Land Use & Climate Innovation
  - Tony Tavares, Director, California Department of Transportation
  - Tanisha Taylor, Executive Director, California Transportation Commission
  - Gustavo Velasquez, Director, California Department of Housing & Community Development