



Metropolitan Transportation Commission

Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

Meeting Agenda

Planning Committee

MTC Committee Members:

James P. Spering, Chair Anne W Halsted, Vice Chair

*Alicia C. Aguirre, Damon Connolly,
Dave Cortese, Sam Liccardo, Julie Pierce*

Non-Voting Members: Tom Azumbrado, Dorene M. Giacomini

Friday, April 14, 2017

9:40 AM

Board Room - 1st Floor

This meeting is scheduled to be webcast live on the Metropolitan Transportation Commission's Website: <http://mtc.ca.gov/whats-happening/meetings> and will take place at 9:40 a.m. or immediately following the 9:35 a.m. Legislation Committee meeting.

1. Roll Call / Confirm Quorum

Quorum: A quorum of this committee shall be a majority of its regular voting members (4).

2. Consent Calendar

- 2a. [17-2384](#) Minutes of the March 24, 2017 Meeting

Action: Committee Approval

Attachments: [2a MTC PLNG Minutes Mar 24 2017.pdf](#)

3. Approval

- 3a. [17-2423](#) MTC Resolution No. 4271: SB375 Greenhouse Gas (GHG) Target Update

The California Air Resources Board is scheduled to adopt updated SB 375 GHG targets for the third cycle of Regional Transportation Plans / Sustainable Communities Strategies as part of its Scoping Plan Update in summer 2017. This item recommends a new GHG reduction target for the Bay Area, conditional on certain state policy actions that would assist the region in meeting the target.

Action: Commission Approval

Presenter: Ken Kirkey

Attachments: [3a MTC Reso No. 4271-SB375 GHG Target Update_rev2.pdf](#)
[3a Handout-MTC Planning Committee April 13 2017.pdf](#)

4. Public Comment / Other Business**5. Adjournment / Next Meeting**

The next meeting of the Joint MTC Planning Committee with the ABAG Administrative Committee will be May 12, 2017, 9:40 a.m. at the Bay Area Metro Center, 375 Beale Street, San Francisco, CA.

Public Comment: The public is encouraged to comment on agenda items at Committee meetings by completing a request-to-speak card (available from staff) and passing it to the Committee secretary. Public comment may be limited by any of the procedures set forth in Section 3.09 of MTC's Procedures Manual (Resolution No. 1058, Revised) if, in the chair's judgment, it is necessary to maintain the orderly flow of business.

Meeting Conduct: If this meeting is willfully interrupted or disrupted by one or more persons rendering orderly conduct of the meeting unfeasible, the Chair may order the removal of individuals who are willfully disrupting the meeting. Such individuals may be arrested. If order cannot be restored by such removal, the members of the Committee may direct that the meeting room be cleared (except for representatives of the press or other news media not participating in the disturbance), and the session may continue.

Record of Meeting: Committee meetings are recorded. Copies of recordings are available at a nominal charge, or recordings may be listened to at MTC offices by appointment. Audiocasts are maintained on MTC's Web site (mtc.ca.gov) for public review for at least one year.

Accessibility and Title VI: MTC provides services/accommodations upon request to persons with disabilities and individuals who are limited-English proficient who wish to address Commission matters. For accommodations or translations assistance, please call 415.778.6757 or 415.778.6769 for TDD/TTY. We require three working days' notice to accommodate your request.

可及性和法令第六章: MTC 根據要求向希望來委員會討論有關事宜的殘疾人士及英語有限者提供服務/方便。需要便利設施或翻譯協助者，請致電 415.778.6757 或 415.778.6769 TDD / TTY。我們要求您在三個工作日前告知，以滿足您的要求。

Acceso y el Titulo VI: La MTC puede proveer asistencia/facilitar la comunicación a las personas discapacitadas y los individuos con conocimiento limitado del inglés quienes quieran dirigirse a la Comisión. Para solicitar asistencia, por favor llame al número 415.778.6757 o al 415.778.6769 para TDD/TTY. Requerimos que solicite asistencia con tres días hábiles de anticipación para poderle proveer asistencia.

Attachments are sent to Committee members, key staff and others as appropriate. Copies will be available at the meeting.

All items on the agenda are subject to action and/or change by the Committee. Actions recommended by staff are subject to change by the Committee.

MTC's Chair and Vice-Chair are ex-officio voting members of all standing Committees.



Metropolitan Transportation Commission

375 Beale Street, Suite 800
San Francisco, CA 94105

Legislation Details (With Text)

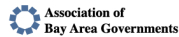
File #: 17-2384 **Version:** 1 **Name:**
Type: Minutes **Status:** Consent
File created: 3/8/2017 **In control:** Planning Committee
On agenda: 4/14/2017 **Final action:**
Title: Minutes of the March 24, 2017 Meeting
Sponsors:
Indexes:
Code sections:
Attachments: [2a MTC_PLNG Minutes_Mar 24 2017.pdf](#)

| Date | Ver. | Action By | Action | Result |
|------|------|-----------|--------|--------|
|------|------|-----------|--------|--------|

Subject:
Minutes of the March 24, 2017 Meeting

Recommended Action:
Committee Approval

Attachments



Agenda Item 2a

Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

Meeting Minutes - Draft

Special Joint MTC Planning Committee with the ABAG Administrative Committee

Friday, March 24, 2017

9:30 AM

Yerba Buena - 1st Floor

1. Roll Call / Confirm Quorum

Present: 5 - Chair Spering, Vice Chair Halsted, Commissioner Pierce, Commissioner Connolly and Commissioner Cortese

Absent: 2 - Commissioner Liccardo and Commissioner Aguirre

Non-Voting Members Absent: Commissioner Azumbrado and Commissioner Giacomini

Ex Officio Voting Member Present: Commission Chair Mackenzie

Ex Officio Voting Member Absent: Commission Vice Chair Haggerty

Ad Hoc Non-Voting Members Present: Commissioner Slocum and Commissioner Worth

ABAG Administrative Committee Members Present: Chavez, Cortese, Eklund, Gupta, Mltchoff, Pierce, and Scharff.

2. Pledge of Allegiance

3. ABAG Compensation Announcement - Clerk of the Board

4. ABAG Administrative Committee Approval of Summary Minutes

4a. [17-2357](#) ABAG - Minutes of the March 10, 2017 Meeting

Action: ABAG Administrative Committee Approval

Attachments: [4a AC 20170324 Item 04 AC Summary Minutes.pdf](#)

5. MTC Compensation Announcement - Committee Secretary

6. Consent Calendar

Approval of the Consent Calendar

Upon the motion by Commissioner Pierce and second by Vice Chair Halsted, the Consent Calendar was approved by the following vote:

Aye: 4 - Chair Spering, Vice Chair Halsted, Commissioner Pierce and Commissioner Connolly

Absent: 3 - Commissioner Liccardo, Commissioner Cortese and Commissioner Aguirre

6a. [17-2358](#) MTC - Minutes of the March 10, 2017 Planning Committee Meeting

Action: MTC Planning Committee Approval

Attachments: [6a MTC PLNG Minutes Mar 2017.pdf](#)

Commissioner Cortese arrived after the approval of the Consent Calendar.

7. Approval

7a. [17-2360](#) Approval of the Contract for Services for the MTC / ABAG Staff Consolidation and Memorandum of Understanding Related to Future Governance

Staff will present for approval the Contract for Services between MTC and ABAG to establish adequate staffing and support of ABAG's statutory duties and responsibilities and Memorandum of Understanding for addressing future governance.

Action: MTC Commission Approval and ABAG Executive Board Approval

Presenter: Steve Heminger and Brad Paul

Attachments: [7a Approval of CS for MTCABAG Staff Consolidation and MOU Related to Future Governance .pdf](#)
[7a PPT Handout-MTC ABAG Presentation .pdf](#)

[7a-Handout-MTC CSR-Letter to ABAGBoard-MTCCommission 3-23-2017.pdf](#)
[7a-Handout CS 6. and 6.1 only.pdf](#)

[7a Handout Received During Meeting from ABAG Ch. SEIU 1021.pdf](#)

[7a Handout Received During Meeting ABAG EXEC Board Requested Changes to MOU.pdf](#)

[7a Handout Reveived During Meeting ABAG EXEC Board Requested Changes to CS.pdf](#)

The following individuals spoke on this item:

Pierce Gould, MTC Staff;

Jim Macrae, MTC Staff;

Marcella Aranda, MTC Committee for Staff Representation;

Lee Huo, SEIU 1021;

Julio Corral, SEIU 1021;

Ursula Vogler, MTC Committee for Staff Representation;

Ken Bukowski;

Pedro Galvao, Non-Profit Housing Association of Northern California;

Matt Vander Sluis, Greenbelt Alliance;

Kearey Smith, MTC Committee for Staff Representation;

Christina Hohorst, MTC Staff;

Michael Brinton, MTC Committee for Staff Representation;

JoAnna Bullock, ABAG Staff;

Maureen Gaffney, ABAG Staff; and

Patricia Perry, ABAG Retiree.

Upon the motion by Commissioner Cortese and second by Vice Chair Halsted, the Contract for Services for the MTC / ABAG Staff Consolidation and Memorandum of Understanding Related to Future Governance was approved as amended to be forwarded to MTC Commission and ABAG Executive Board for approval. The motion carried by the following vote:

Aye: 4 - Vice Chair Halsted, Commissioner Pierce, Commissioner Connolly and Commissioner Cortese

Nay: 1 - Chair Spering

Absent: 2 - Commissioner Liccardo and Commissioner Aguirre

8. Public Comment / Other Business

Ken Bukowski was called to speak.

9. Adjournment / Next Meeting

The next meeting of the Joint MTC Planning Committee with the ABAG Administrative Committee will be April 14, 2017, 10:00 a.m. at the Bay Area Metro Center, 375 Beale Street, San Francisco, CA.



Metropolitan Transportation Commission

375 Beale Street, Suite 800
San Francisco, CA 94105

Legislation Details (With Text)

File #: 17-2423 **Version:** 1 **Name:**
Type: Resolution **Status:** Commission Approval
File created: 3/14/2017 **In control:** Planning Committee
On agenda: 4/14/2017 **Final action:**
Title: MTC Resolution No. 4271: SB375 Greenhouse Gas (GHG) Target Update

The California Air Resources Board is scheduled to adopt updated SB 375 GHG targets for the third cycle of Regional Transportation Plans / Sustainable Communities Strategies as part of its Scoping Plan Update in summer 2017. This item recommends a new GHG reduction target for the Bay Area, conditional on certain state policy actions that would assist the region in meeting the target.

Sponsors:

Indexes:

Code sections:

Attachments: [3a MTC Reso No. 4271-SB375 GHG Target Update_rev2.pdf](#)
[3a Handout-MTC Planning Committee April 13 2017.pdf](#)

| Date | Ver. | Action By | Action | Result |
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Subject:

MTC Resolution No. 4271: SB375 Greenhouse Gas (GHG) Target Update

The California Air Resources Board is scheduled to adopt updated SB 375 GHG targets for the third cycle of Regional Transportation Plans / Sustainable Communities Strategies as part of its Scoping Plan Update in summer 2017. This item recommends a new GHG reduction target for the Bay Area, conditional on certain state policy actions that would assist the region in meeting the target.

Presenter:

Ken Kirkey

Recommended Action:

Commission Approval

Attachments



METROPOLITAN
TRANSPORTATION
COMMISSION

Agenda Item 3a

Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105
TEL 415.778.6700
WEB www.mtc.ca.gov

Memorandum

TO: Planning Committee

DATE: April 7, 2017

FR: Executive Director

RE: MTC Resolution No. 4271: SB375 Greenhouse Gas Target Update

Background

The California Air Resources Board (ARB) released the draft Scoping Plan Update in January 2017 and is scheduled to release draft SB 375 GHG targets in late spring/early summer. Each California Metropolitan Planning Organization (MPO) is required to meet the new ARB targets for the years 2020 and 2035 in the upcoming third round of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) plans. MTC is currently in the midst of the 2017 RTP/SCS (Plan Bay Area 2040) process for which the first and second round targets apply, so these new third targets will be applicable to the 2021 RTP/SCS.

For the first and second RTP/SCS rounds, ARB set targets for the ABAG/MTC region of a 7 percent per capita reduction from 2005 levels by 2020, and a 15 percent per capita reduction from 2005 by 2035. These targets were exceeded in the 2013 RTP/SCS, which was forecast to reduce per capita greenhouse gas emissions by 10 percent by 2020 and by 16 percent by 2035. We are on track to exceed these targets by comparable margins in Plan Bay Area 2040 as well.

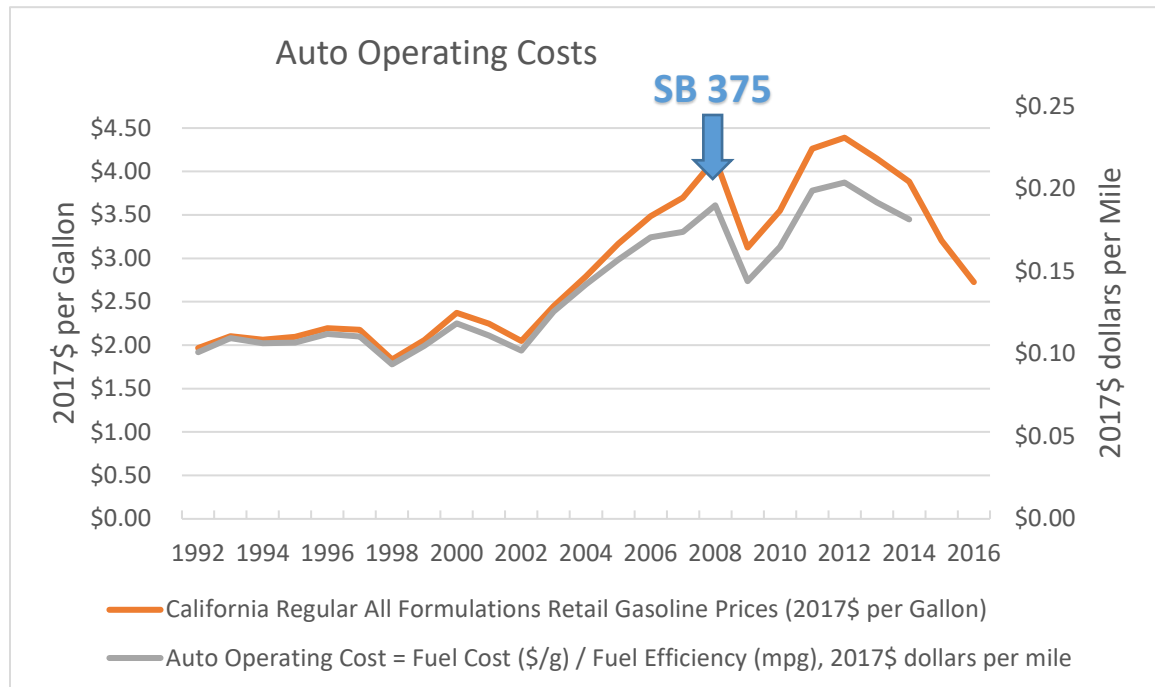
Bay Area Greenhouse Gas Target Considerations

On March 23, 2017, Executive Directors from the other large California Metropolitan Planning Organizations (MPOs) along with MTC Planning Director Ken Kirkey presented challenges and stress test results to the ARB board¹. During this presentation, MPO staff emphasized that:

- MPOs continue to push the envelope in terms of focused growth in land use, but feasible land use strategies are not sufficient to achieve the needed reductions in GHG emissions.
- Low fuel prices and increased fuel efficiency is resulting in reduced auto operating costs. This, in turn, is causing California residents to drive more (the rebound effect), making it more challenging for MPOs to achieve greenhouse gas emissions reduction targets based on less driving (see chart on next page).

¹ March 2017 Planning Committee memo on stress test results:
<https://mtc.legistar.com/View.ashx?M=F&ID=5003116&GUID=4871AE42-408D-45C4-88ED-B76655BB6A8E>

ARB meeting webcast: <http://cal-span.org/unipage/index.php?site=cal-span&owner=CARB&date=2017-03-23>



- MPOs need more state funding to incentivize focused growth and transit connectivity to support state climate goals.
- In studying aggressive policies to lower GHG emissions, we are concerned about the equity impacts of both displacement as well as roadway pricing, which has a greater proportional impact on lower income travelers.

Despite these challenges, and given the urgency of reducing the impacts of climate change, we believe that it is very important to reduce GHG emissions related to metropolitan growth and transportation. To further California's leadership in this effort, the four largest California MPOs — Southern California Association of Governments (SCAG), San Diego Association of Governments (SANDAG), Sacramento Area Council of Governments (SACOG) and MTC — aspire to make our Regional Transportation Plans/Sustainable Communities Strategies both “ambitious and achievable.”

Bay Area Greenhouse Gas Target Reduction Recommendation

With these considerations in mind, MTC staff recommend increasing the 2035 target to 18% per capita reduction in GHG from 2005 levels for the 2021 RTP/SCS and beyond. This recommendation has been developed in coordination with the other three largest California MPOs, which are also recommending a standard 18% per capita reduction for their regional plans based on similar experiences with reductions in previous RTP/SCS rounds, stress test results and rebound effect challenges. This recommendation is **conditional** on several factors that we believe are critical to achieving this target:

- The state will grant pricing authority to MPOs so they can bring user auto operating costs back to levels commensurate with 2008 levels (the conditions under which SB 375 was enacted). Because roadway pricing is regressive, equity exemptions and mitigations should be included.
- The state will dedicate funding to support transit, ridesharing, and non-motorized transportation from pricing mechanisms and new state sources and programs.

- The state will provide additional funding to ensure implementation of regional plans/sustainable communities strategies, on a scale commensurate with the defunct redevelopment law.
- ARB will commit to address issues resulting from any update to the Emission Factor emissions model for target setting and target compliance, including any model-related impacts on target attainment.

In addition to the factors above, during the March 23rd Air Resources Board meeting, ARB Board Member and UC Davis Professor Daniel Sperling proposed a best practices roundtable to include representatives from ARB, the MPOs and other entities to identify and define new initiatives, incentives and regulations for achieving the RTP/SCS targets. We foresee the following strategies being part of this discussion:

- Potential regulations requiring that autonomous vehicles and Transportation Network Company (TNC) fleets such as Uber and Lyft be zero emissions.
- Enabling the reduction of emissions related to school and public transit trips through accelerating the turnover of these fleets to electric.
- Potential to strengthen requirements to site state-funded and state-licensed facilities (state agency offices, hospitals, etc.) in transit-served locations. These are large job centers and the destinations for many trips, so locating them in transit-accessible areas would reduce their impact on GHG emissions and provide significant equity benefits to low income/transit dependent individuals. (See attachment A for *San Francisco Hospital Transportation Challenges and Impacts*.)
- Potential to increase enforcement of California's Parking Cash Out law². Parking Cash Out refers to the California's 1992 legislation requiring that employers who subsidize parking for workers must also offer them the option to take an equivalent cash allowance instead of the parking subsidy. This law only applies to larger employers (50 or more employees) that rent the parking spaces they provide to their workers free or below cost.
- Expand the availability of efficient first and last mile transit solutions to provide for more carbon efficient commuting.
- In partnership with the state's air districts, consider advancing the development of an Indirect Source Review rule or similar mechanism to mitigate emissions from larger employment centers located in areas with high levels of vehicle miles traveled due to inadequate transit service or a lack of workforce housing.

With these measures in place, we believe the proposed target will be achievable in the third (2021) RTP/SCS. In short, we believe that continued progress on achieving tougher GHG targets will require a new funding and policy partnership between the state and its major metropolitan regions.


² Donald Shoup's Parking Cash Out (American Planning Association Planning Advisory Service Report Number 532): <http://shoup.bol.ucla.edu/ParkingCashOut.pdf>

Next Steps

Upon Commission approval, MTC staff will issue a report to the Air Resources Board recommending the 18% per capita greenhouse gas emissions reduction target from 2005 levels for 2035 for the next round of RTP/SCSs, conditional on the factors outlined in this memo. ARB will release a Draft Staff Report and Environmental Document in late spring/early summer 2017 including updated targets for California MPOs. Following a set of CEQA workshops in the summer, ARB plans to adopt final targets in fall 2017 and update their technical methodology for reviewing MPO SCS greenhouse gas quantification. MTC staff will engage with ARB, other MPO staff and additional participants in the best practices roundtable to advance successful attainment of the GHG targets.

Recommendation

Staff recommends that the Planning Committee refer Resolution No. 4271 to the Commission, which sets forth the conditional "Bay Area Greenhouse Gas Target Reduction Recommendation" to inform and guide ARB in setting these targets for the Bay Area.


Steve Heminger

Attachment:

- Attachment A: SF Hospital Transportation Challenges & Impacts

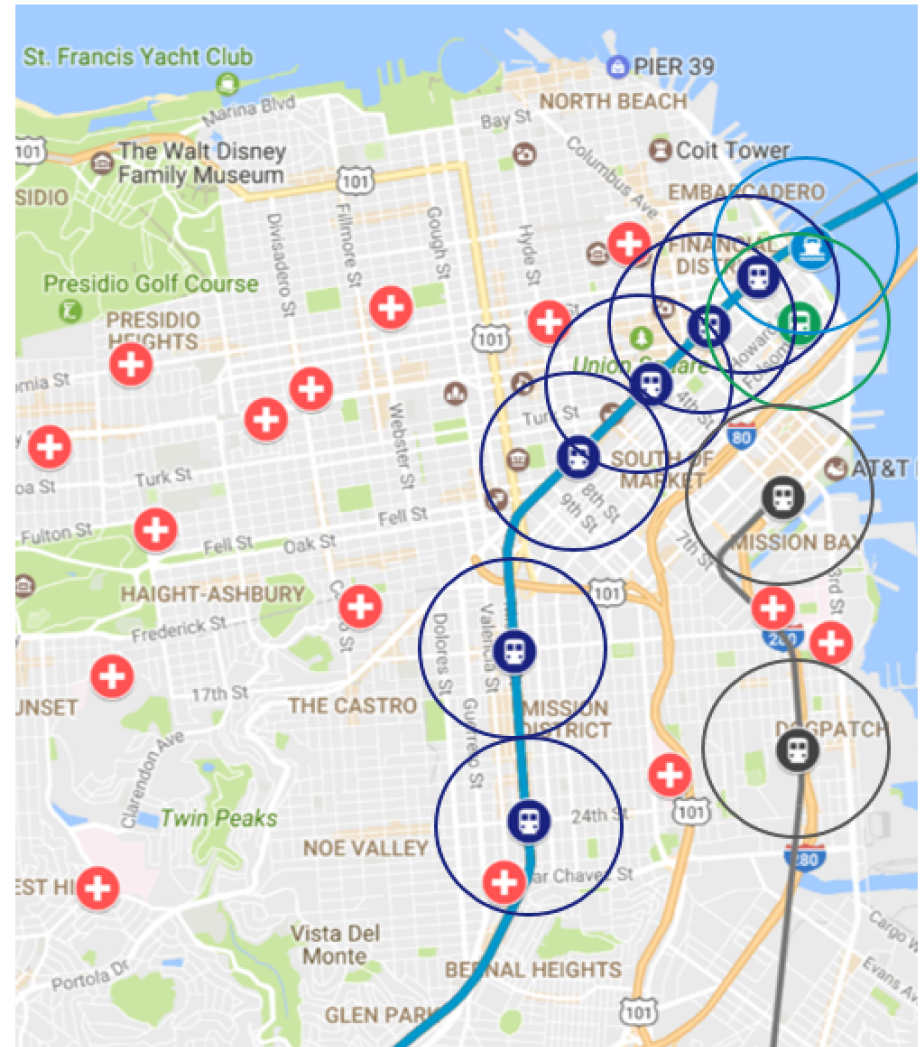
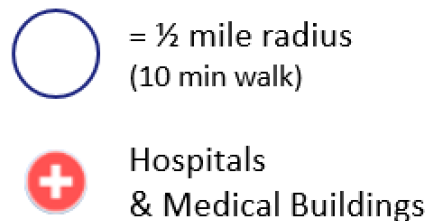
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SF Hospital Transportation Challenges & Impacts

No direct service by BART, AC Transit, WETA, or WestCAT

- Hospitals are dense employment centers and are not located near regional transit stations
- Many employees (48%*) live outside SF (23% East Bay*)
- Working and middle class employees can't afford to live close to best employment opportunities
- High turnover of frontline employees who transfer to jobs closer to home
- High cost of recruiting and training new employees



Date: April 26, 2017
Referred by: Planning

ABSTRACT

Resolution No. 4271

This resolution approves the recommendation to the Air Resources Board of an 18% per capita greenhouse gas reduction target for 2035 compared to 2005 levels for the 2021 Bay Area Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and beyond.

Discussion of this resolution is contained in the Executive Director's Memorandum to the Planning Committee dated April 7, 2017.

Date: April 26, 2017
Referred by: Planning

RE: Resolution to recommend to the Air Resources Board a conditional 18% per capita greenhouse gas reduction target for 2035 from 2005 levels to the Air Resources Board for the 2021 Regional Transportation Plan/Sustainable Communities Strategy and beyond

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 4271

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning, financing and coordinating agency for the San Francisco Bay Area pursuant to Government Code Section 66500 *et seq.*; and

WHEREAS, the Sustainable Communities and Climate Protection Act of 2008 ((Chap. 728, Stats. 2008) Senate Bill 375, or SB 375, as amended) requires each California Metropolitan Planning Organization (MPO), as part of its Regional Transportation Plan (RTP) planning process, to develop a Sustainable Communities Strategy (SCS) or an Alternative Planning Strategy (APS) that meets regional greenhouse gas (GHG) emission reduction targets (targets) set by the Air Resources Board (ARB);

WHEREAS, SB 375 also recognizes ARB's target-setting responsibility as a recurring process, requiring ARB to update the targets every eight years and permits target updates every four years;

WHEREAS, low fuel prices and increased fuel efficiency is resulting in reduced auto operating costs, which is resulting in California residents driving more (the rebound effect), making it more challenging for MPOs to achieve GHG reduction targets;

WHEREAS, ARB Board Member, UC Davis Professor Daniel Sperling will convene a best practices roundtable to include representatives from ARB, the MPOs and other entities to identify and define new initiatives, incentives and regulations for achieving the RTP/SCS targets, including: 1) potential regulations requiring that autonomous vehicles and Transportation Network Company (TNC) fleets such as Uber and Lyft be electric; 2) enabling the reduction of emissions related to school and public transit trips through accelerating the turnover of these fleets to electric; 3) potential to strengthen requirements to site public facilities/state-funded facilities (state agency

offices, hospitals, etc.) in transit-served locations; 4) potential to increase enforcement of California's Parking Cash Out law; 5) expand the availability of efficient first and last mile transit solutions to provide for more carbon efficient commuting; 6) in partnership with the state's air districts, consider advancing the development of an Indirect Source Review (ISR) rule or similar mechanism to mitigate emissions from larger employment centers located in areas with high levels of vehicle miles traveled due to inadequate transit service and/or a lack of workforce housing; 7) the development of zero emission vehicles and alternative transportation fuel systems that should be promoted and incentivized.

WHEREAS, **conditional** upon the state granting pricing authority to MPOs to bring user auto operating costs back to levels commensurate with 2008 levels (the conditions under which SB 375 was enacted);

WHEREAS, **conditional** upon the state dedicating funding to support transit, ridesharing, and non-motorized transportation from pricing mechanisms and new state sources and programs;

WHEREAS, **conditional** upon the state provide additional funding to ensure implementation of regional plans/sustainable communities strategies, on a scale commensurate with the defunct redevelopment law;

WHEREAS, **conditional** upon ARB committing to address issues resulting from any update to the Emission Factor emissions model for target setting and target compliance, including any model-related impacts on target attainment; now, therefore, be it

RESOLVED, that the Metropolitan Transportation Commission hereby recommends an 18% per capita greenhouse gas emissions reduction target for 2035 from 2005 levels for the third round of RTP/SCS and beyond.

METROPOLITAN TRANSPORTATION COMMISSION

Jake Mackenzie, Chair

The above resolution was entered into by
the Metropolitan Transportation Commission
at a regular meeting of the Commission
held in San Francisco, California on April 26, 2017

SB375 GHG Target Update Recommendation

Ken Kirkey, MTC

April 14, 2017

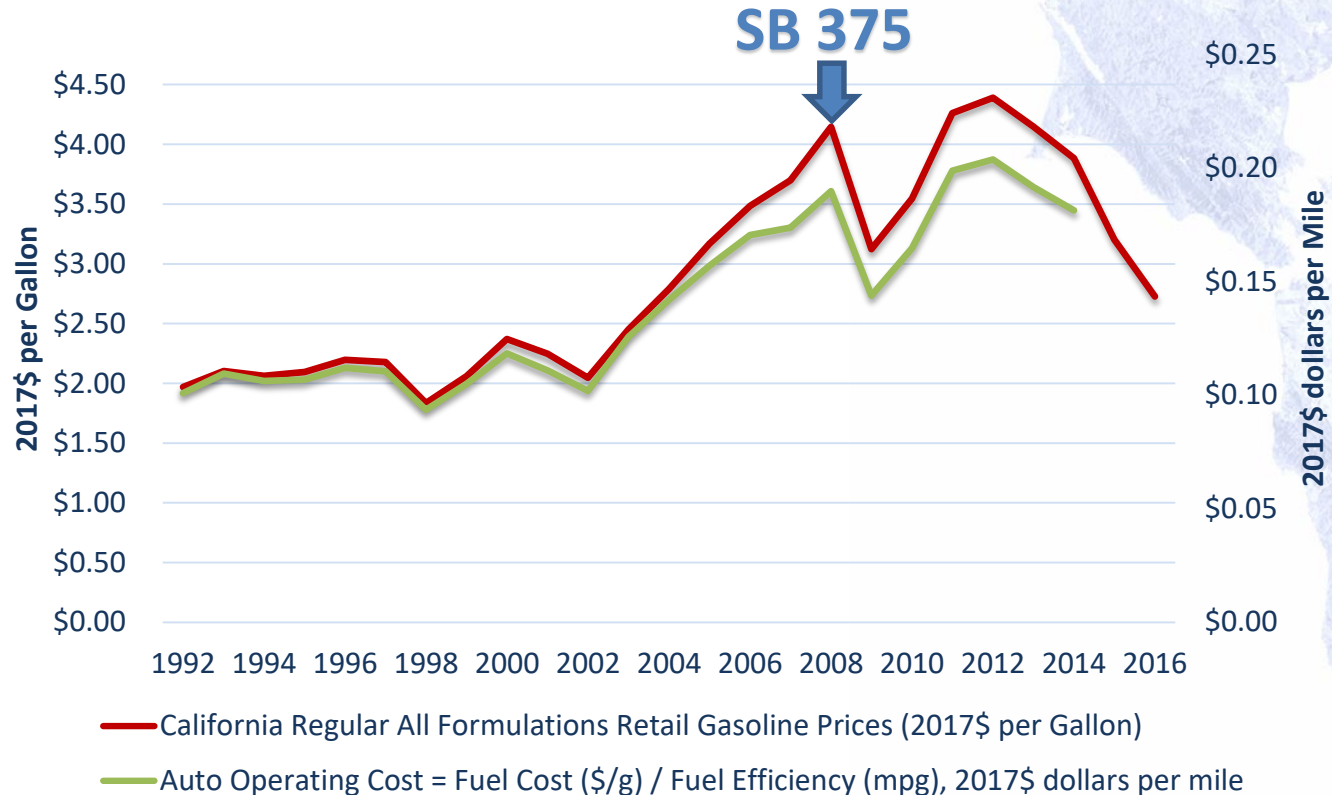
Background

- California Air Resources Board (ARB) updating GHG Targets
- Includes SB375 Targets for Regional Transportation Plans/Sustainable Communities Strategies
- 1st Round Targets for MTC/ABAG (Achieved):
 - 2020: 7% per capita
 - 2035: 15% per capita

What We've Learned

- **Denser** development pattern can further reduce GHG, but only with more aggressive market intervention and with greater risk of displacement
- **Road Pricing** is a highly effective tool to reduce VMT and hence emissions, but can have equity impacts
- **Treadmill** effect related to cleaner fleets driving down the cost of driving – higher SB375 targets more challenging

Auto Operating Costs



Bay Area Greenhouse Gas Target Reduction Recommendation

- **18%** per capita reduction from 2005 levels for 2035 **conditional** upon
 - The state granting pricing authority to MPOs to bring auto operating costs back to levels commensurate with 2008
 - The state dedicating funding to support transit, ride-sharing and non-motorized transportation, and other RTP/SCS strategies
 - The state will provide additional funding to ensure implementation of RTP/SCS on a scale commensurate with redevelopment law
 - ARB committing to address issues resulting from any update from the Emission Factor model for target setting and compliance

Next Steps

- **April:** MTC Staff will issue a report to ARB recommending the 18% per capita reduction target
- **Spring/Summer:** ARB Board Member and UC Davis Professor Daniel Sperling will lead a best practices roundtable including representatives from ARB, the MPOs and other entities
- **Spring/Summer:** ARB will release a Draft Staff Report and Environmental Document with updated targets and lead CEQA workshops
- **Fall:** ARB adopts final targets and updates their technical methodology



April 13, 2017

MTC Planning Committee
Via email to: kkerkey@mtc.ca.gov

Re: April 14 Meeting: Agenda Item 3a. GHG Target Update

Dear Members of the Planning Committee:

BIA Bay Area respectfully submits these comments on the MTC staff proposal to recommend to CARB an increase in the Bay Area's the long-term SB 375 per capita GHG target to 18% conditioned on several significant state policy changes.

We think the staff recommendation has considerable merit. While BIA continues to adhere to the view expressed in our March 9, 2017 letter that the region has to date not demonstrated that more ambitious targets are achievable "on the ground" (as opposed to in computer model exercises), we agree with the proposed approach of seeking more aggressive GHG targets only if the state enacts fundamental policy changes that are necessary to enable them to be achieved. It is important and appropriate for the MPOs collectively to send a clear message to CARB and other state agencies (including the Legislature) that they cannot simply look to the regions to magically make up for any GHG reduction shortfalls that may result after accounting for their own policies and programs.

Relatedly, BIA also strongly concurs with the clear recognition in the staff report that our region has exhausted the GHG reductions that can be feasibly wrung out of the land use "sector." Both existing Plan Bay Area, and the final preferred scenario set to be adopted as part of the Plan Bay Area 2040 update, assume/project development types, locations, and densities that are far more aggressive than the region has shown willing or able to achieve. As the staff report aptly puts it:

MPOs continue to push the envelope in terms of focused growth in land use, but feasible land use strategies are not sufficient to achieve the needed reductions in GHG emissions.

This, too, is a fundamental message that the MPOs need to convey loudly and clearly to the Legislature and state agencies. In too many instances, there is a profound disconnect between state agencies' assumptions about land use and GHG reductions and the evidence-based experiences of the MPOs. Caltrans' recently adopted California Transportation Plan 2040 provides a stark example. There, Caltrans uses the current SCS land use assumptions for its modeling of future GHG reduction—including the very aggressive Plan Bay Area development pattern which, as noted in BIA's prior letter, the region has not come close to achieving. Caltrans, however, not only "pockets" the GHG reductions associated

with the extremely ambitious “modeled” housing density and concentration intensity pattern in our existing SCS, it casually suggests without any discussion of feasibility or achievability that MPOs may be called upon to adopt even more extreme land use patterns (more “efficient” in its words) if additional GHG reductions are needed in the future:

[T]his CTP [California Transportation Plan] must consider how MPO-level land use forecasting (though SB 375) and implementation of SCSs will contribute to statewide GHG emission reductions. The first round of SCSs developed by California’s MPOs included significant shifts to future regional growth patterns compared to prior regional plans... For the purposes of [the CPT], Caltrans utilized the SCS land use assumptions as inputs... ***Caltrans recognizes that even more transportation efficient land uses can provide even greater reductions in GHG emissions than those modeled in CTP 2040.*** (CTP 2040, p. 74)¹

Lastly, BIA thinks it is very important that the following essential state policy reform be added to the “factors” on which the increased GHG reduction targets are conditioned: “significant reform to the housing approval and development process to enable the housing that is contemplated by SCSs to be approved and constructed.”

Thank you for the opportunity to comment.

Yours very truly,

A handwritten signature in dark ink, appearing to read "Paul Campos". The signature is fluid and cursive, with the first name "Paul" and last name "Campos" clearly distinguishable.

Paul Campos
Sr. V.P. & General Counsel

¹ <http://www.dot.ca.gov/hq/tpp/californiatrnsportationplan2040/Final%20CTP/FINALCTP2040-Report-WebReady.pdf>