



April 24, 2017

Hon. Jake Mackenzie, Chair
and Members of the Commission
Metropolitan Transportation Commission
Via email to: rleyva@mtc.ca.gov

Re: April 26 Meeting: Agenda Item 8a. GHG Target Update

Dear Chair Mackenzie:

BIA Bay Area respectfully submits these comments on the 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.

BIA thinks the proposal has considerable merit. While BIA continues to adhere to the view expressed in prior letters and testimony on this topic that the region has not yet 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 upon condition that 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 for the April 14 Planning Committee meeting aptly put 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.

BIA believes that this, too, is a fundamental message that the MPOs need to convey 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 used the current SCS land use assumptions for its modeling of future GHG reduction—including the very aggressive existing Plan Bay Area development pattern which, as noted in BIA’s prior communications, the region has not come close to achieving. Caltrans, however, not only “pocketed” the GHG reductions associated with the extremely ambitious “modeled” housing density and concentration intensity pattern in our existing SCS, it suggested 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

Finally, in our comment letter to the Planning Committee on this issue, BIA suggested that an additional essential state policy reform be added to the “factors” on which the increased GHG reduction targets are conditioned: one related to housing production policy reform. We are pleased the Planning Committee recommended adding to the draft Resolution language calling for the state to “strengthen[] mandates and incentives to align housing production and employment center proximity” as one of the necessary reforms on which more aggressive GHG targets are conditioned.

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/californiatransportationplan2040/Final%20CTP/FINALCTP2040-Report-WebReady.pdf>