

July 1, 2010

Sean Randolph  
Chair, Joint Policy Committee  
101 Eighth St  
Oakland, CA 94607

Subject: SB 375 greenhouse gas emission reduction targets

Dear Chair Randolph and Joint Policy Committee members:

Thank you for your ongoing work to create a more sustainable and equitable Bay Area, and your current engagement on creation of the Bay Area's Sustainable Communities Strategy (SCS). Implementation of SB375 will benefit the health and well-being of Bay Area residents, businesses, and governments in many ways, as described below. Ambitious greenhouse gas (GHG) reduction targets are needed to set the stage for the land use and transportation policies that will achieve those benefits.

The undersigned organizations are concerned that the GHG targets that have been discussed to date for the region are not ambitious enough, and will lead to an SCS that falls short of the region's potential. The scenarios that have been used to assess potential greenhouse gas emission reduction targets for the Bay Area don't reflect the good work that cities and the region have *already* been doing on land use changes and progressive transportation policy. In addition, MTC's current modeling software is outdated and significantly underestimates potential GHG reductions.

We applaud MTC staff for their recent commitments to **study additional growth scenarios** that include a variety of different policy strategies, and to **use additional tools and empirical studies** to more accurately capture the GHG reductions from these strategies. This letter outlines a few key steps that should be taken during the coming weeks to ensure that the Bay Area sets GHG reduction targets for SB375 that will maximize regional quality of life benefits.

### **Study a range of strategies to inform what is possible**

In the coming weeks, MTC should study scenarios that:

- *Achieve a jobs/housing balance* by planning for enough homes in the region for all projected job growth, as required by SB375. This will actually make it *easier* to achieve a per-capita GHG reduction, since it's much easier to reduce the GHG emissions of new growth than of the existing built environment. The more new growth that is averaged in with the existing population, the greater the per-capita GHG reduction.
- *Make realistic assumptions about the number of employed residents per household.* The current scenarios use a number that is above any historic jobs/housing ratio, including at the height of the dot-com boom. A realistic ratio would consider both historical trends in the region and future demographic shifts, such as an aging population, which would lead to fewer employed workers per household.

- *Change land use patterns to show more growth in areas near job centers and along transit networks*, like in Silicon Valley and the inner East Bay, not *just* in San Francisco.
- *Use a variety of different possible pricing mechanisms*. For example, ensure that bridge tolls are increased to keep up with inflation, or study a scenario that applies pricing to more freeway lanes.
- *Build on and extend the innovative Transportation Demand Management (TDM) and non-motorized transportation strategies* that already are underway in the region, such as ridesharing, vanpooling, Safe Routes to Schools, and the regional bike network.
- *Consider alternative transportation investments*. While the RTP spends less than 10% of funds on road expansions, that is still hundreds of millions of dollars that could go a long way towards GHG reducing programs like incentivizing land use changes through grants to cities, implementing TDM measures, or supporting transit in the inner core.

### **Acknowledge and account for deficiencies in current modeling technology**

We commend MTC for their current efforts to update their scenario modeling software to a more modern model which uses up-to-date research and techniques, and will provide a more accurate measurement of the impacts of different policy choices on travel and emissions. Unfortunately, this model will not be ready in time to affect the target-setting process, and MTC's current modeling software is outdated and significantly underestimates potential GHG reductions. For example:

- People in walkable neighborhoods near transit are more likely to choose to walk, bike, or take the train rather than drive than those in auto-oriented areas. The current model is not sensitive to land use differences. It overestimates auto ownership, auto trips, and trip length in transit-oriented, dense urban areas, and underestimates walk and bike trips.
- When people experience significant traffic levels, they are more likely to make different decisions about both where they will go and how they will get there. The current model does not take into account different travel choices based on congestion.
- The current model does not estimate emission reductions from Transportation Demand Management (TDM) measures such as Safe Routes to Schools.

We encourage MTC to make decisions based on the best, most up-to-date tools and data. In the absence of the best tools, we appreciate MTC's commitments to:

- *Be public and transparent about the shortcomings of the models* and clarify whether the results the models are showing are really the best we can do.

- *Use off-model tools, including post-processors, to calculate benefits of land use changes, pricing changes, and Transportation Demand Management (TDM) measures.*
- *Where off-model tools are not easily available, estimate emissions reductions using factors derived from the empirical literature.*

### **The Bay Area needs ambitious targets**

With SB375, we have an opportunity to get the Bay Area’s communities working together on stubborn problems like traffic, getting homes to be within reach of the people who live and work here, promoting better health, saving open space, and taking care of our water. Creating an SCS that is truly ambitious in reducing GHG emissions from cars and light trucks will be good for the region in many ways:

#### **Good for the economy**

CEO members of the Bay Area Council and the Silicon Valley Leadership Group consistently cite traffic congestion and the lack of affordable homes as the top two challenges to doing business in the Bay Area. Additionally, investing in public transportation produced twice as many jobs per dollar as investing in roads.

#### **Good for the balance sheet**

Better directing new growth and development can reduce infrastructure costs by about 25%. In the Sacramento region that would mean taxpayer savings of \$16 billion; in Southern California, savings grow to \$48 billion. Just as importantly, the state and federal governments are increasingly directing scarce infrastructure dollars toward communities that are taking action to reduce greenhouse gas emissions by planning for sustainable communities – examples include grants from California’s Strategic Growth Council, the federal government’s new Partnership for Sustainable Communities grants, and future federal transportation funds and cap-and trade revenues. Ambitious implementation of SB375 can make the Bay Area more competitive for funding.

#### **Good for the community**

Creating walkable neighborhoods close to job centers helps reduce countless hours spent stuck in traffic and allows Bay Area residents to spend more time with family and friends. It also helps save households money: Giving residents a variety of choices for where to live can help create homes we can all afford. Plus, people who live in areas with more transportation options for how to get around, so they can choose to take public transit, walk or bike, save an average of \$3,850 per average household each year.

#### **Good for health**

Air pollution in the Bay Area has been linked to 2,600 premature deaths annually, and thousands of hospitalizations due to asthma and other respiratory illnesses. Global warming threatens to exacerbate our air quality problems and result in higher rates of illness, hospitalizations and premature death. Sustainable, mixed use communities designed around mass transit, walking and cycling have been shown to reduce greenhouse gas emissions, air pollution and a range of adverse health outcomes including traffic injuries, cancers, lung and heart disease, obesity, diabetes, and other chronic health conditions. In addition to the benefits to lung health,

individuals who live in mixed-use and walkable communities have a 35 percent lower risk of obesity.

**Good for social equity**

Where people live can have significant consequences for their health. For example, the Bay Area Regional Health Inequities Initiative released a study in 2008 which documented that, in the nine-county San Francisco Bay Area, people who live in poor neighborhoods can expect to live on average 10 years less than people who live in affluent neighborhoods. The built environment harbors many of the conditions that contribute to these stunning differences in life expectancy. Health inequities can be addressed by improving transportation choices that will enable residents of low income communities and communities of color to have better access to nutritious food, health care services, recreational facilities, affordable housing, and job opportunities which are often out of reach.

**Good for the environment**

The Bay Area loses approximately 3500 acres of natural lands each year to sprawl development. Focusing growth and development in cities and towns, making the best use of existing municipal resources, will help California communities use less energy and water and protect our natural areas. And as people choose to walk, bike, or take transit, we improve our national security by reducing our need to import dangerous foreign oil for automobile fuel.

We look forward to continuing to work with you to ensure a healthy, vibrant, and prosperous Bay Area.

Sincerely,

Jenny Bard, Regional Air Quality Director  
American Lung Association in California

Andy Katz, JD, Government Relations Director  
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Copies to:  
Metropolitan Transportation Commission Chair Scott Haggerty and Commissioners  
ABAG Administrative Committee Chair Mark Green and Committee members