

Southern California Leadership Council

September 1, 2010

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SCAG Regional Council
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

Subject: SB 375 Implementation

Southern California and SCAG have been pursuing smart growth policies for more than a decade. These efforts should continue. SB 375 is an unfunded state mandate for local governments to pursue specific goals for the reduction of carbon emissions from cars and light trucks through changes in land use and transportation planning and programs in furtherance of AB 32. Since passage of SB 375, the State of California has de-funded transit, transportation and redevelopment support for local government. This continues years of state diversion of revenues from gasoline, sales, income and other taxes needed for local government programs. Now CARB plans to impose SB 375 per capita targets for the Southern California region of 8% for 2020 and 13% for 2035 which exceed the range of possible outcomes developed by SCAG.

Local government cannot achieve these mandated changes without **increased**, not decreased, state support. SCAG's "business as usual" base case modeling shows the need to continue pre SB375 state funding levels to achieve even a 6% per capita reduction in carbon emissions by 2020. Therefore, SCAG, as the region's MPO, must explicitly condition any level or range of implementation goal on availability of specific performance standards for state support for planning, transit, transportation and redevelopment and other necessary funding.

SCAG should also pursue changes in SB 375 regulation which credit the region with carbon reduction for the planning and installation of clean refueling infrastructure and clean vehicle charging and refueling in new and redeveloped housing. Many of these clean fueling projects can leverage public private partnerships to supplement state and local support.


The Center of Economic Development

444 South Flower Street ♦ 34th Floor ♦ Los Angeles ♦ CA 90071 ♦ Tel: (213) 622-4300 ♦ Fax: (213) 622-7100

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It is unreasonable to consider per capita levels of carbon reduction goals above 5% for Southern California without such an approach. SB 375 is one of the least cost effective means of achieving greenhouse gas reductions sought by AB 32. Limited state, regional and local resources demand their most cost effective use in these difficult economic times. Job retention and creation must be a paramount consideration if we are to generate the tax revenues necessary to support these aspirations. SCLC looks forward to working with SCAG to identify these specific state performance requirements in an effort to continue our progress on smart growth in Southern California.

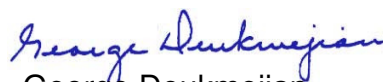
Sincerely,



Gray Davis
2010 Co-Chair



Pete Wilson
36th Governor of
California



George Deukmejian
35th Governor of
California



Greg McWilliams
2010 Co-Chair

cc: Governor Arnold Schwarzenegger
Mary Nichols, Chair
CARB
Susan Kennedy, Chief of Staff
Barry Wallerstein

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