

January 9, 2023

Ms. Marjie Kirn
Executive Director
Santa Barbara County Association of Governments
260 North San Antonio Road., Suite B
Santa Barbara, California 93110

Dear Ms. Kirn:

In accordance with the Sustainable Communities and Climate Protection Act of 2008, please find enclosed the California Air Resources Board's (CARB) Executive Order G-22-321 and CARB staff's evaluation of the Santa Barbara County Association of Governments' (SBCAG) SB 375 Regional Transportation Plan/Sustainable Communities Strategy (2021 SCS). The Executive Order accepts SBCAG's determination that the region achieved its target of 13 percent per capita reduction by 2020 relative to 2005 levels, due to a steep decline in travel activity during the COVID-19 pandemic. It also accepts SBCAG's determination that its 2021 SCS would, when implemented, meet the applicable 2035 greenhouse gas (GHG) emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 17 percent per capita reduction by 2035 relative to 2005 levels. CARB staff's evaluation report summarizes its assessment, findings, and recommendations relating to the determination on the 2035 target.

CARB staff appreciates SBCAG and its member jurisdictions adopting additional strategies in the 2021 SCS. Though the Executive Order accepts the 2021 SCS 2035 target determination based on a sufficient presentation of information that would support achievement if every strategy and measure were in fact implemented, CARB staff are concerned that this plan will not be fully implemented as SBCAG envisions. Implementation of several key actions in the 2021 SCS depend on other agencies who have not made commitments to do so, and additional commitments are needed to support SBCAG's assumptions. For example, the telecommuting/remote work strategy requires local and private employer support and buy-in to implement it at the assumed level. Additionally, more support will be needed to realize the infill development and affordable housing assumptions in the plan. Nevertheless, the actions identified in the plan establish an important blueprint to guide future efforts, and we applaud SBCAG for expanding its focus on land use and housing in this plan.

Even with a requirement of 100 percent zero-emission vehicles sales in 2035, California needs strong commitments to implement vehicle miles traveled (VMT) reduction strategies to meet California's climate commitments and support the statewide effort to successfully mitigate the worst impacts of climate change. Implementation of SBCAG's adopted 2021 SCS is an important piece of this. To support successful implementation, and the GHG benefits claimed, CARB staff include specific recommendations within the SCS Evaluation Report and request SBCAG regularly monitor the implementation of the plan in consultation with CARB and other relevant agencies.

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CARB staff appreciates SBCAG's continued work to advance sustainable transportation and land use planning in California and looks forward to an ongoing partnership to implement this plan. If you have any questions or need further information, please contact Dr. Jennifer Gress, Chief of the Sustainable Transportation and Communities Division, at Jennifer.Gress@arb.ca.gov.

Sincerely,



Steven S. Cliff, Ph.D., Executive Officer

Enclosures

cc: (via email) See next page

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cc: Mr. Michael Becker
Director of Planning
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Ms. Jennifer Gress, Ph.D.
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