

HOW WELL IS SB 375 WORKING IN THE SACRAMENTO REGION?

A Thesis

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by

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Abstract  
of  
HOW WELL IS SB 375 WORKING IN THE SACRAMENTO REGION?  
by  
Cory Alexander Bullis

In 2008, the California Legislature passed SB 375, which required the state’s metropolitan planning organizations to reduce greenhouse gas emissions through better land use and transportation planning. Their first milestone to reduce emissions was 2020. With this deadline just around the corner, it is unclear if Sacramento is on track to hit its target, or how well implementation is going overall. Finally, given this first round of implementation, it is unclear what additional tools will be needed to hit the following milestone after 2020, 2035.

This study answered each of these questions through a series of in-person or phone interviews with public officials involved in the implementation of SB 375 in Sacramento – local planners, planners at the Sacramento metropolitan planning organization, and state agency officials.

My research found that Sacramento is on track to meet the 2020 target, and the area faces many barriers to implementation, the biggest one being lack of appropriate funding. Furthermore, Sacramento has a long way to go in building the demographics necessary that want and are able to afford the kinds of land use projects built through SB 375. And finally, if Sacramento is going to meet its 2035 target, it will need additional tools in the form of more creative financing

mechanisms, more direct outreach from the state and metropolitan planning organizations to local governments helping them with implementation, and broader CEQA reform to encourage more SB 375-type development.

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## Chapter One

### INTRODUCTION

#### **A New Frontier for Land Use Policy**

The passage of Senate Bill 375 (Steinberg) in 2008 brought a new element to California land use planning – greenhouse gas emissions. It directed California’s 18 metropolitan planning organizations (MPOs), who are responsible for regional planning efforts, to reduce greenhouse gas emissions through better land use and transportation planning. It also directed the State Air Resources Board (ARB) to develop emission reduction targets for 2020 and 2035 respectively for the MPOs to meet. This requirement was a new frontier for land use planning in California – while some MPOs had already given this idea consideration, it was not widely considered across all MPOs, or even fully implemented by MPOs that did consider it.

The first emissions reduction deadline, 2020, is only a few years off, which is not long in land use planning time. Meanwhile, ARB has already initiated a process to calculate the emission reduction targets for 2035, to be finalized July 2017. This raises the question – have the MPOs been successful in staying on track to meet their 2020 targets? What are the lessons learned from this first round of implementation?

My thesis intends to be a case study of SB 375 implementation efforts in the Sacramento region to understand fully its successes and challenges, and to understand the implementation experiences of both SACOG and the local planners. Specifically, this case study aims to answer the following questions: *Is SB 375 working in the Sacramento region?* In this context, I define “working” to mean that SACOG is on track to meet its

2020 GHG target. This thesis aims to address additional related questions including:

*What are the benefits and challenges of SB 375 implementation? Furthermore, is SB 375 working well, and what policies have been the most fruitful in SACOG's path to compliance?*

My case study will weave together a series of perspectives from public officials involved in all levels of implementation in Sacramento – state, regional, and local – through qualitative interviews. Research to date has analyzed the strengths and weaknesses of SB 375 and assessed potential barriers to implementation, including surveying local land use planners on their resource needs. However, this research has been surface level at best in telling the complete story of implementation. It does not holistically tell how SB 375 is changing planning at the local level, if at all. Also, the current research has yet to assess if the MPOs are on track to meet their GHG reduction targets. My research aims to understand these aspects of implementation.

### **Putting the 'You' in Land Use**

Land use policy literally shapes our parks, neighborhoods, and our cities – both our natural and built environments. How we build our environment in turn drives how we then interact with it. When you leave your house to go to work, the grocery store, or the park – when and how you get to each of these destinations, and in fact the specific destination you choose, is a direct result of land use policy shaping your behavior. Whether you choose to walk, drive, or take public transit, is also a result of these same policies. For example, the City of Davis has heavily incorporated bikes lanes into the

city, including even traffic lights for bikes. Thus, more people choose to ride a bike over driving or walking.

California has locked itself into a decades-long trend of land use policies enabling urban sprawl. Generations of families have grown up in burgeoning suburbia - commuting long distances to work, school, and other locations every day. The automobile has made traveling long distances relatively short work, and so we think nothing of our reliance on vehicles to access these destinations. Our suburbia continues to exacerbate urban sprawl by gobbling up land on the urban fringe. These land use decisions to continually build outward encourage more driving longer distances. In turn, these behaviors have consequences for our health and our environment. Gasoline- and diesel-fueled vehicles are a known source of greenhouse gas (GHG) emissions, pumping carbon into our atmosphere every time we use them. This negative externality not only contributes to global climate change, but also creates air pollution, which has known adverse health outcomes including asthma and respiratory illnesses. At a population of 38 million, California's transportation sector is responsible for approximately 36 percent of its annual GHG emissions. By 2050, California's population is expected to grow to 50 million, which translates into an increase in vehicle use and travel, unless we can change our auto-dependent behavior.

### **The Dynamics of Land Use Planning**

Land use decision-making is a locally controlled process. Cities and counties establish planning and zoning laws to control how land is developed in their sphere of

influence. With 482 cities and 58 counties in California, it is easy to understand in part why urban sprawl is so prevalent – these jurisdictions, which control California’s land use decisions, must manage population growth in some form. Population growth means these jurisdictions must develop land for housing and transportation needs to accommodate this increase. The city councils and county governments making land use decisions operate autonomously, and many view development and growth within their boundaries as positive economic engines that create jobs and ultimately raises revenues for their budgets.

Despite this local control, land use planning is also conducted using a regional lens such as looking at the future growth of all of Los Angeles County rather than just each individual city within its boundaries. The same can be said for the Sacramento region – planners also look at growth for Yolo, Sacramento, and Placer Counties collectively, and how to plan for that in a coordinated way. As part of this regional visioning, federal law requires that an urbanized area with a population of at least 50,000 be guided and maintained by a regional entity called a metropolitan planning organization (MPO). California has 18 MPOs accounting for approximately 98 percent of its population, as shown in Figure 1.1.

One of the primary responsibilities of the MPOs is to develop a regional transportation plan (RTP), which is a blueprint for the region’s transportation system 30 years into the future. The MPOs update their RTPs every five years. In short, MPO’s are key to the broader planning process aimed at preventing sprawl, so it is crucial to understand how well MPO plans work.

Figure 1.1 A Map of California's MPOs



It terms of implementing SB 375, ARB, the Strategic Growth Council (SGC), and the Office of Planning and Research (OPR) play a role at the state level of not only calculating the GHG emission reduction targets, but also tracking the MPOs' progress

and helping them implement SB 375. In this sense, ARB has a more regulatory role, while SGC and OPR have facilitator roles that support the MPOs – they provide planning guidance. In turn, the MPOs provide planning guidance to the local governments in their jurisdiction to encourage SB 375-compliant land use decisions and practices.

However, MPOs have no direct control over their local governments' land use decisions. This factor is key to my research questions for two reasons – First, SACOG's success in meeting its 2020 target is wholly dependent on its local governments making SB 375-compliant land use decisions. SACOG will not be able to meet its target if these jurisdictions do not change their development patterns. Second, understanding the implementation experiences of the local governments is vital to understanding whether implementation is working. Getting a better understanding of how the local governments are implementing SB 375, their viewpoints on the benefits and disadvantages of SB 375 as a policy, and what their resource needs are to make this work will reveal if they are making the needed changes to their land use decisions, which in turn will determine whether SACOG is on track to meet its 2020 target. This research will also provide insight on how to strengthen implementation efforts beyond 2020.

### **Changing the Status Quo: The Birth of SB 375**

Sacramento's MPO, the Sacramento Area Council of Governments (SACOG), was the first California MPO to seriously consider sustainable growth management practices that would reduce Sacramento's carbon footprint. To better reduce the region's sprawl and thus GHG emissions from increased travel, SACOG adopted a Blueprint plan

in 2004 that integrated these concepts into its planning efforts. Calculating a 50 percent population increase by 2025 that would further burden the region with air pollution problems, SACOG crafted a sustainable growth management plan. Its Blueprint boasted sustainable growth practices, including encouraging compact, mixed-use development, incentivizing infill development over developing green fields on the urban fringe, and providing more access to and increased availability of alternative transportation options, including public transit, walking, and biking (Eaken, 2012).

SACOG's Blueprint's was a markedly different planning vision compared to the MPO's traditional planning documents, and was ultimately the impetus for SB 375. In 2007, then State Senate President Pro Tem Darrell Steinberg introduced the bill to make SACOG's 2004 Blueprint the standard practice for all MPOs. Signed into law late 2008, SB 375 directed the Air Resources Board (ARB) to develop greenhouse gas (GHG) emission reduction targets for the automobile and light-duty truck sector for each MPO to fulfill by 2020 and 2035, respectively. Furthermore, it directed the MPOs to craft "Sustainable Communities Strategies" (SCSs) as part of their RTPs to meet these targets. These SCSs became a roadmap to reducing emissions by proposing more sustainable development patterns that better integrated an alternative transportation network, as well as bolstered additional transportation measures and policies that encouraged people to drive less (SB 375, Steinberg, Statutes of 2008).

SACOG's first official SCS developed goals to help meet its overall GHG reduction targets, including:

1. Increasing travel by transit, bicycle, and walking by 32.8 percent;



2. Reducing per capita passenger VMT travel by 8.8 percent;
3. Reversing commuting trends – get 60 percent of commuters into downtown Sacramento to take public transit by 2035;
4. Growing Sacramento’s urban footprint by only 7 percent despite a 39 percent population growth by 2035;
5. Doubling Sacramento’s transit services, and;
6. Increasing housing growth near job centers.

To fulfill these goals, SACOG’s plan focuses on three categories: transit priority areas, the region’s housing options, and job centers. In particular, SACOG aimed to focus development within transit priorities, defined as areas located within one-half mile of a major transit station or a high-quality transit corridor, and thus make developed areas more accessible. Furthermore, SACOG proposed developing housing on much smaller lots, which is considerably different from the region’s traditional housing development pattern. In the past, 333 acres of land were developed to accommodate each 1,000 residents, however, the SCS requires only 42 acres per 1,000 residents. Finally, SACOG aimed to concentrate housing and other development within the region’s 15 identified employment centers, shortening individuals’ commute time. SACOG set a target of reducing the average commute by 9 percent, from 20.5 miles in 2008 to 18.7 miles in 2035 (Eaken, 2012).

### **Sacramento Leads the Way**

As the MPO that pioneered SB 375 policy, the Sacramento region is the most instructive example to assess how well implementation is working. Sacramento is furthest in implementing SB 375, if only for the fact that the region began implementing sustainable growth management practices with their original Blueprint in 2004. The lessons learned from Sacramento can be helpful to informing many of the other MPO's implementation efforts. Furthermore, previous assessments of SB 375 implementation have focused more on the policy generally across all MPOs and local jurisdictions, rather than focusing solely on one MPO's efforts. A deeper level assessment, especially for the Sacramento region, will be most telling on just how well SB 375 is working, and how local governments' experiences with the policy are affecting their ability to make land use decisions that enable SACOG to meet its target.

## Chapter Two

### LITERATURE REVIEW

Scholars and practitioners have long been interested in the interaction between transportation and land use planning and the effects it has on individual behavior, as well as its environmental impacts, is not new. Driving distances and the resulting greenhouse gas (GHG) emissions have increased because of lack of practical public transit, safe walking and biking routes, as well as an increase in the distances between residential, commercial and other destinations (ALA, 2010). Furthermore, the number of miles Californians drive has increased by 35 percent since 1990, and could increase another 20 percent by 2020 (ALA, 2010). Although SB 375 statutorily pioneers reducing GHG emissions through coordinated land use and transportation planning, it is not the origin of the policy. Rather, it is the culmination of years of the study and practice of land use and transportation planning.

The Sacramento Area Council of Governments (SACOG) first established the prototype policy to SB 375 with the adoption of the Preferred Blueprint Scenario in 2004, which depicted its vision for growth for the Sacramento region. This vision carried the basic sustainability principles of SB 375 – compact, mixed-use development, and more transit choices that encouraged people to drive their cars less (Eaken, 2012).

Since SB 375's passage, scholars have scrutinized the law to understand if it lives up to expectations. Existing literature largely falls into three categories: 1) reviewing what SB 375 does and how; 2) assessing SB 375's limitations, and therefore potential barriers to implementation, and; 3) exploring in what ways SB 375 has been successful. I

will review each category of research and its results, provide specific critiques, and conclude with how my research will build upon this foundation of literature.

### **What does SB 375 do, and how?**

SB 375 policy has been informed by a growing base of literature suggesting the need for smart growth policies because they contain sprawl and yield other societal benefits. For example, when the City of Davis opened its first big box store in 2009, researchers measured its effect on vehicle-miles traveled (VMT) – the distance an individual travels in her car to a specific destination in her town or city. Researchers studied how it affected consumers' shopping travel, and concluded that bringing retail destinations closer to residences helps reduce VMTs (Lovejoy, 2013). This research is one of many examples of how land use decision affects VMTs.

Studies like these create the basis for imposing smart growth policies that spur compact development and the conservation of natural resources on the urban edge. Encouraging people to drive less has added co-benefits – improved air quality, less traffic congestion, more convenient and efficient mass transit, and more walkable and bicycle-friendly neighborhoods (Nichols, 2010). Building on this further, these benefits improve public health, reduce hospital costs, and ultimately reduced costs for households, both through healthcare and reduced travel expenses (ALA, 2010).

This growing area of research pointed to the need for a broad-reaching land use policy that would encourage sustainable growth management practices to both increase economic prosperity and protect the environment for all Californians. The rationale for

this need became increasingly clear – containing urban sprawl prevents increases in travel distances in vehicles, thus containing increases in GHG emissions in a given area. As a result, improved air quality leads to better health outcomes for communities, and saves people money. This was the impetus for SACOG’s original Blueprint, which in turn led to the creation of SB 375.

To achieve these benefits, SB 375 directs the California Air Resources Board (ARB) to set GHG reduction targets for California’s 18 metropolitan planning organizations (MPOs) for the years 2020 and 2035 (Steinberg, SB 375, Statutes of 2008). SB 375 requires further that each MPO adopt a Sustainable Communities Strategy (SCS) as part of their regional, long-term transportation plans for their region. The SCS is the blueprint for achieving the required emissions reductions determined by ARB. Although each MPO has a different reduction target based on its size, most SCSs require a seven to eight percent reduction from 2005 emission levels by 2020, and a thirteen to sixteen percent reduction from 2005 emission levels by the year 2035 (Hettinger, 2010). Achieving these targets requires land use changes at the local level, while the MPOs guide implementation.

Rather than employing a command-and-control approach to land use policy from a regional scale, SB 375 takes an incentive-based approach. Land developers can reap several rewards for their project through sustainable, SB 375-compliant development in several ways: access to federal funding, fast-tracked environmental review, or even exemption from certain California Environmental Quality Act requirements, assuming their project meets environmental specifications (Hettinger, 2010). Existing research

points out that should communities fail to take advantage of these incentives, they will suffer consequences – through increased, unsustainable spending of economic and natural resources to support bedroom communities. Residents will also lack places to lead active lifestyles, and will continue to spend too much time stuck in traffic (Nichols, 2010).

### **What are SB 375's limitations and barriers to implementation?**

Previous studies suggest there are various limitations to the approach taken by SB 375. SB 375's biggest limitation is that it requires regional MPOs to drive land use changes that are tightly controlled by local officials. The MPOs have no direct land use powers (Sciara, 2014; Sciara 2015). This paradoxical division limits MPO's ability to control their region's land use, and solely requires the voluntary cooperation of local planners and public officials (Barbour & Deakin, 2012).

There is evidence to show that smart growth management policies at the local, regional, and state level have limited effects. Maryland's Frederick County used an incentive-based policy to preserve agricultural lands from conversion to more carbon intensive uses. One study of this policy concluded that the policy could not fully contain sprawl (Hanlon et al., 2012). Although Maryland's counties overall preserved some farmlands, they still followed low density development patterns (Ali, 2014). Wisconsin also provides incentives for cities to develop smart growth plans. However, one study of 30 different plans found limited inclusion of smart growth goals. Cities ranged from including smart growth goals comprehensively to not at all (Edward & Haines, 2007).

Because SB 375 depends on locally controlled land use decisions, California's General Plans for each of its cities become critical to implementation. These General Plans indicate how each city will grow, and how each will manage that growth. These forward-looking documents are planning documents for land use decisions (Sciara, 2014). Sciara surveyed 31 General Plans updated since SB 375's passage, evaluating them on key SB 375 principles. Sciara then scored the General Plans based on their inclusion of the specified SB 375 principles, how they linked those policies to practical implementation strategies, and how much implementation detail they provided. Sciara concluded the performance of these General Plans in integrating these SB 375 principles is low. This is a direct result of SB 375's failure to require General Plans to be consistent with state land use standards, as is required Oregon and Florida (Lampert, 2009). Some General Plans are using some SB 375-compatible implementation strategies, including street design standards, and better coordination of land use between transportation and housing agencies.

Barbour and Deakin surveyed city planning directors in the state's four largest metropolitan areas as well as the San Joaquin Valley on local climate policy activity. Barbour and Deakin concluded that climate policymaking in these cities was a result of compliance with new CEQA requirements requiring mitigation of climate impacts of development choices rather than compliance with SB 375 (Barbour & Deakin, 2012). Furthermore, their survey results found that many planners proclaimed SB 375 was an unfunded mandate. They said that SB 375-type planning is more costly than non-compliant SB 375 planning, and the lack of funding limited their ability to implement the

law. Adding on to this, the researchers' surveys found that local planners' requirements to comply with CEQA complicates their ability to comply with SB 375. Every project must go through a CEQA review process. However, CEQA evaluates projects on a project-by-project basis, whereas SB 375 uses a regional lens for planning and placement of projects. As a result, projects that are highly valuable through a SB 375 lens can still have difficulty complying with CEQA requirements, which only takes localized environmental impacts into consideration, rather than taking the regional environmental benefits into consideration when approving the project. Finally, their survey found that a higher share of Sacramento (100 percent) cities also participated in regional blueprint planning, of which 85 percent viewed the process as very or somewhat effective at integrating regional and local needs and priorities. Sacramento cities were the highest-ranking cities in this respect.

Sciara also conducted a survey of the presence of sustainability policies in cities and counties across California, and found that land use planning activities were some of the most common sustainability policies dimensions (Sciara, 2013).

### **In what ways is SB 375 successful?**

SB 375's greatest strength appears to be its use of incentives to encourage sustainable development (Hettinger, 2010). This can be a powerful tool, especially when developers can access federal funding for their project. Furthermore, SB 375 creates bias for development near transit stations, otherwise known as transit priority areas, by streamlining the environmental review process for projects located in these areas (Eaken,



2012). In Sacramento's SCS in particular, it calculates a land consumption rate of 42 acres per 1,000 residents, whereas before SB 375, Sacramento consumed 333 acres of land per resident (Eaken, 2012). This is a major decline in land consumption because of the region's SCS, preserving more natural lands for wildlife and their habitat.

The state's four large MPOs – the San Diego Association of Governments, the Metropolitan Transportation Commission, the Southern California Association of Governments, and SACOG – all had well-established smart growth programs before SB 375, which provided grants to developers for sustainable, SB 375-esque projects. A survey of the performance of these programs concluded that local governments have eagerly applied for funds from these programs, clearly demonstrating that incentive programs like these are in demand (Sciara, 2013). Furthermore, grants from these smart growth programs most often funded improvements for bicycle and pedestrian travel, the areas surrounding transit stations, and streetscapes. SB 375 statutorily formalized this incentive-based process, and builds upon the foundation of these MPO's programs while also expanding them to the other MPOs.

SB 375 has also created a more inclusive process to regional planning that facilitates collaboration, both within a community and across MPOs (Frick et al, 2015). Researchers conducted three regional case studies based on in-depth interviews and participant observation to understand the SB 375 regional planning process. The researchers chose the three case studies based on the three winners in California that the Housing & Urban Development Department has identified as having completed substantial sustainability planning. This could result in selection bias, as the researchers

did not choose these case studies at random. Furthermore, they concluded that collaboration processes vary across MPOs, but that MPO leadership is key to creating more equitable and inclusive land use policies.

### **Next Steps for Further Research**

The current literature on SB 375 and similar smart growth policies, although expansive and diverse, does not tell the complete story. These studies only assess, to some degree, the successes and failures of SB 375 in terms of specific or projected outcomes in land use changes and policies. They do not evaluate whether California's MPOs are on track to fulfill SB 375's mandate – reduced GHG emissions through land use and transportation planning. This is likely due in part to prior research being conducted too early to assess the MPOs' progress. Land use changes and the resulting behavioral changes are long-term in nature. However, the 2020 deadline is not far off, and ARB has already initiated a process to evaluate and update the MPOs' VMT reduction targets for 2035, to be completed by July 2017. This regulatory process begs the question – in this first round of SB 375 implementation, how successful have the MPOs been? Are they on track to meet their 2020 goals? What policies are and are not working to achieve this, and how do we know?

My research aims to contribute to the literature on SB 375 by attempting to make a preliminary determination of how well SB 375 is working at this point in a single area, Sacramento. Existing literature shows that the Sacramento region is getting the most out of the SB 375 process, and has the most advanced SB 375 implementation process in

place. This is understandable, considering that SACOG pioneered the SB 375 framework. Therefore, we can get a sense of SB 375's potential overall success by focusing on a region which presumably is most likely to achieve such success.

In the next chapter I will discuss my research methodology, including a more in depth discussion of why I chose Sacramento for my case study, the value of interviews over other methods of research, who I interview and why, and what questions I use for the basis of my interviews.

## **Chapter Three**

### METHODOLOGY

In this chapter, I will describe the methodology for my study. This will include a discussion of why I chose the Sacramento region and how that might bias my assessment. I will also review the Sacramento Area Council of Government's (SACOG) Sustainable Community Strategy (SCS) and discuss how that forms the basis for measuring success. Furthermore, I will discuss who I am interviewing and why, why I chose in-depth interviews over surveys, and conclude with a discussion of my interview questions.

#### **Why Sacramento and SACOG?**

I chose to study Sacramento's progress in fulfilling its SB 375 goal for three reasons. First, as one of the four major metropolitan areas, it has similar physical conditions to other regions, including the San Diego area, and other mid-sized cities and counties in the Central Valley. Natural lands surround much of the Sacramento region's urban edge, allowing its cities to expand outward with low density development if they chose. Because of this, we can study over the years whether the region is truly following its SB 375 principles – are they preventing sprawl on the urban edge? This study seeks to understand this, and because of these similar geographic conditions, these findings can potentially be applicable to other aforementioned regions of the state. The San Francisco Bay Area, managed by the Metropolitan Transportation Commission, and the Greater Los Angeles Area, managed by the Southern California Association of Governments, have unique physical conditions due to their already highly dense, highly urban growth

patterns. These unique conditions would, to some extent, preclude this study's applicability to other metropolitan planning organizations and regions, as they confront population and growth demands unique unto them.

Second, SACOG is the founding father of the SB 375 framework. The policy is derived from their original blueprint planning process dating back to 2004. Of all the MPOs, it is the most advanced in the implementation process, and has the greatest chance of success in meeting their vehicles miles traveled (VMT) reduction obligation. SB 375 is highly integrated into SACOG's land use and transportation planning principles, making SACOG a prime example of what is possible when prioritizing smart growth management policies. This should provide insight especially into policies that are not working, since presumably if they do not work in Sacramento they may not work elsewhere.

Third, and as a matter of practicality, I live in Sacramento. As a student attending graduate school part-time while working full time, I have limited resources to study multiple MPOs' progress, and other MPO's that are much further away at that. Studying SACOG and the Sacramento region is more manageable, as I can more easily access my interviewees due to proximity.

### **SACOG's SCS: Measuring Success**

SACOG's SCS is the master plan to not only sustainably grow the region, but to ultimately achieve a reduction in VMTs and GHGs. It maps out the region's goals and associated implementation strategies and tactics. SACOG condenses these policies and

strategies into four major categories: land use and environmental sustainability, finance, system maintenance and operations, and system expansion.

The SCS is the instrument I will use to in part measure SACOG's success – is Sacramento meeting its VMT target laid out in the plan? Of the SCS's 31 policies and implementation strategies, which ones are most successful? Which incentives are local planners using most often? How is this driving land use change? These questions should elicit insight on the implementation experiences of SACOG and its local governments, which will be telling of whether SACOG is on track to meet its 2020 target. Furthermore, as part of its plan to reduce emissions, SACOG identifies five primary investment areas to help with implementation, which include:

1. Public transit
2. Developing house and employment within transit priority areas
3. Bicycle and pedestrian infrastructure
4. Systems operation and management
5. Programs, planning, and processes

Is SACOG making the envisioned investments in the timeframe they expected? Are the visions for the Sacramento region embedded in these investment categories coming to fruition? Have there been unexpected barriers to implementation of these visions, and how has SACOG overcome them? The SCS begs these questions and more, and will ultimately drive the direction of my interviews.

### **Interviews vs. Surveys**

Because this research is exploratory in nature, it was best-served by qualitatively interviewing local planners and other subject matter experts helping to implement SB 375. They provide the most detailed description of the Sacramento region's progress to date. There are two primary advantages to conducting face-to-face interviews, which include their ability to explore the subtle nuances of SB 375 implementation, and that my discussion questions are lengthy and require significant attention and focus from the interviewee.

First, these interviews enabled me to explore the more technical and nuanced areas of the SB 375 implementation. The interviews allowed me to ask follow-up questions that ultimately provided more flexibility to the conversation. In turn, I teased out subtleties in interviewees' opinions about SB 375. This was time-consuming, which leads to the next advantage of interviews.

Second, interviews were necessary because asking questions and discussing the answers took a long time. SB 375 is a complex issue, and to fully explore the issues I raised required a lengthy interview. I needed interviewees to be focused on the topic and to give me their full attention when discussing something so complex.

Surveys can be helpful to an extent, but ultimately do not satisfy the requirements of this study. Surveys can help acquire basic information regarding this issue, but they do not fully answer my research questions. Surveys serve to answer basic and direct questions, and to report an interviewee's behavioral trends. Furthermore, surveys are highly standardized, making it difficult to change course in the research after the study

has begun. Surveys may also not be as successful in capturing the full attention of the expert for an extended amount of time, which in turn would undermine the quality of answers they could provide.

### **Interview Subjects**

Because I am evaluating implementation progress, I specifically wanted to interview people responsible for and involved in the actual implementation of the policy on the ground to understand what is and is not working. I also wanted to interview staff from the state agencies responsible for facilitating implementation at a state agency level, as those efforts supposedly trickle down to the local level to help with implementation. While other stakeholders provide a valuable perspective to SB 375 implementation, they ultimately do not implement the law directly, and therefore I have decided not to include them in my interviews.

The people I contacted included principal planners from several jurisdictions in the Sacramento area, both at cities and counties. I also contacted planners at SACOG responsible for SB 375 implementation, as well as state agency officials at agencies responsible for measuring, tracking, and facilitating implementation. In total, I conducted nine interviews. These interview subjects were critical to understanding implementation efforts because they are directly involved in the implementation process. They would conceivably provide the best insight on whether local land use decisions are complying with SB 375, what benefits and challenges they are experiencing because of this state law, and what tools and resources are needed to facilitate better implementation.



## Interview Questions

Between interviewing staff from state agencies, SACOG, and local planners, the questions have a lot of overlap, with some slight variations, depending on who I am interviewing. My questions can be placed into several categories, discussed below.

First, to understand if Sacramento is on track to meet its GHG reduction target, I asked local planners, SACOG and state agencies the following questions:

- What is SACOG's GHG reduction target for 2020 as required by the Air Resources Board? Is Sacramento on track to hit this target? How do you know?
- SB 375 brings together three elements of planning – housing, transportation, and resource conservation. Is your jurisdiction succeeding in these areas, i.e. more dense housing closer to urban centers, more public transit better integrated with urban clusters, and protection of natural lands from sprawl? How do you know?

These questions speak to the target itself – whether Sacramento is on track in reducing its regional GHG emissions. I followed up this line of questioning with additional questions regarding what tools and policies are enabling them to hit their target, as follows:

- SACOG's Sustainable Community Strategy outlines 31 policies and supportive strategies to help its cities and counties fulfill its SB 375 mandate, broken out into four categories.

- Which of these policies is SACOG most often using? Why?
- Which of these policies are local governments most often using? Why?
- Which policies are key to enabling SACOG to meet its target?

Second, I wanted to understand the varying aspects of implementation with local planners, SACOG, and state agencies – such as how SB 375 affects local planning, what benefits and disadvantages it poses to planning, and what the barriers are to implementation. My questions were as follows:

- SACOG is required to reduce GHG emissions through better land use planning.  
How does this affect your local planning?
- What benefits/advantages does SB 375 pose to your local planning efforts? What barriers/challenges does SB 375 pose to your local planning efforts?
- Is there sufficient federal, state, and local funding to implement SB 375? How much is needed?
- What barriers is Sacramento facing for SB 375 implementation? What is SACOG doing to overcome this? What are local governments doing to overcome this?

Once my interviewees explained SB 375's benefits and disadvantages, followed by outlining the barriers to implementation, my next natural line of questioning was what the state was doing as whole to overcome those barriers. Building on this, if Sacramento is

going to strengthen its GHG reduction target for 2035, what additional tools and policies will Sacramento need to meet that target? My questions were as follows:

- What is the state doing to help Sacramento implement SB 375? Should they be doing more, and if so, what?
- What challenges does SACOG's 2035 VMT reduction target pose for the region? What tools, policies, and incentives does SACOG and its members need to hit that target?

These questions aim to dig at all aspects of the progress of implementation by understanding in what ways is Sacramento succeeding, what barriers to implementation exist, and what more the state could do to help overcome those barriers.

### **The Status of Interviews**

In total, I conducted 9 interviews over the phone or in person with local planners, state agencies representatives, and SACOG staff. My interviews ran anywhere from 30 minutes at the shortest, to 1 hour and 30 minutes at the longest. In general, people were very engaged and responsive – I was able to get through all my questions, but more importantly, tease out subtleties in their responses by asking important follow-up questions that provided significant detail.

## Chapter Four

### FINDINGS

Given the diversity of jurisdictions I interviewed for my research, interviewees gave a wide variety of answers on some questions, while providing parallel answers on other questions. Their responses to my interview questions were as follows:

- *What is SACOG's GHG reduction target for 2020 as required by the Air Resources Board? Is Sacramento on track to hit this target? How do you know?*

SACOG's GHG reduction target is 7 percent by 2020, and SACOG is on track for 8 percent reductions, as predicted by their modeling. Two interviewees expressed that SACOG will meet and actually exceed its 2020 reduction goal – however, that assessment is based on modeling first calculated in 2012. SACOG has yet to go back and check the results of that modeling to see if their land use assumptions are playing out the way they had initially assumed. As a matter of process, SACOG shares with ARB its land use modeling and the amount of emissions it will reduce. ARB reviews this modeling for accuracy through an independent analysis, and conducts an additional sensitivity analysis of SACOG's modeling to ensure it is indeed accurate. As recently as September 2016, ARB released a document detailing its technical evaluation of SACOG's latest modeling assumptions. In the report, ARB discusses land use and transportation trends in Sacramento (which incorporates land use, socioeconomic and

transportation characteristics), reviews SACOG's SCS strategies, and evaluates SACOG's modeling overall. The modeling incorporates assumptions related to the region's demographics, income distribution, automobile operating costs, transportation network inputs, and land use allocation. As a result, ARB firmly concluded in this document, that, "based on all the evidence including model inputs, outputs, and assumptions, the SCS strategies, and performance indicators...would, if implemented, meet [SACOG's 2020 target]" (ARB 2016).

According to two interviewees, SACOG's modeling is an intensive, data-driven process that requires significant computer power to compute. It is not as simple as plugging in a few numbers that spit out a clear-cut result showing if the region will meet its GHG reduction target. The key to modeling, as in most cases, is that it is based on a series of interlocking assumptions on how SACOG expects Sacramento's land use decisions to play out. Because land use planning is all about forecasting the future, the accuracy of the assumptions cannot be fully determined until years (or worst case, a decade or two) after the fact. SB 375 requires SACOG and the other MPOs to update their SCSs every four years, in which they must update their modeling to reflect any changes (or lack thereof) in their land use assumptions. This process builds in an automatic mechanism for review to understand if their assumptions indeed prove true. This four-year cycle of review provides the best "real time" data SACOG has to understand if it is on track.

- *SB 375 brings together three elements of planning – housing, transportation, and resource conservation. Is your jurisdiction succeeding in these areas, i.e. more dense housing closer to urban centers, more public transit better integrated with urban clusters, and protection of natural lands from sprawl? How do you know?*

All interviewees reported that Sacramento overall is headed in the right direction on all three of these elements – the region is seeing more infill development, especially in downtown Sacramento and West Sacramento. Yolo County is successfully driving growth into its already urbanized areas. For the local governments that are not as SB 375-compliant as others, two interviewees stated that it is not for lack of trying. These interviewees said they are working to set themselves up for better SB 375 planning by updating their general plans and zoning regulations that enable and encourage SB 375 development projects.

One interviewee did raise an interesting point for consideration, noting that these development decisions and opportunities (and others more generally) are driven more by the economy as a whole rather than state and local land use policies.

- *SACOG’s Sustainable Community Strategy outlines 31 policies and supportive strategies to help its cities and counties fulfill its SB 375 mandate, broken out into four categories.*
  - *Which of these policies is SACOG most often using? Why?*

- *Which of these policies are local governments most often using? Why?*

The answers to these questions were not as clear-cut as I had assumed they would be. Most interviewees could not comment on what policies they thought SACOG was using the most. Overall, they stated that SACOG consistently funded local governments that completed SB 375-compliant planning efforts and development projects. This is in part a function of the funding being so critical to encouraging local governments to conduct SB 375 type planning and build SB 375 compliant projects. Even though interviewees could not reference the specific strategies in connection to the SCS, they touched on several without realizing it. In particular, all interviewees discussed how SACOG conducted significant outreach to educate locals about SB 375, as well as encourage them to locate their greenfield developments as close to the urban edge as possible to limit the effects of sprawl. Most strategies interviewees referenced fell into the land use and environmental sustainability policies outlined in the SCS. However, SACOG's SCS also discusses financing policies and strategies to provide local jurisdictions with adequate funding to implement SB 375. All interviewees, in one form or another, touched on the principles of financing, whether it was securing SACOG grants, or SACOG helping them secure state funding for SB 375 investments, or SACOG using its own federal funding for SB 375-related efforts. All talked about financing strategies as paramount to making SB 375 work for the region. In addition, one interviewee explained that SACOG pursues all strategies listed in the SCS to some degree – each one plays a role in reducing emissions.

When it came to what local governments were doing, the responses were diverse. Two interviewees were not even aware of SACOG's expansive policies listed in its Sustainable Community Strategy, while one stated that their jurisdiction did not take advantage of these policies or incentives because it doesn't affect them. Their agency already tries to drive growth into the urbanized part of their jurisdiction as much as possible, which means they are not building transportation or housing infrastructure in much of the greenfields within their boundaries. Because of this, they are not able to take advantage of transportation infrastructure incentives or other policies that help them manage growth within their area, because no growth is occurring in the first place. One interviewee stated that they are siting more projects near transit areas, expanding transit lines with more transit stops, and incorporating sufficient affordable housing across the board for all of their housing projects. These efforts ideally enable more residents to take advantage of public transit by making it more accessible, and more affordable housing makes the area more accessible to individuals of varying income levels. A different interviewee explained that their jurisdiction was putting all of their earned SACOG funds back into public transit, reducing their jurisdictions parking standards, and are prioritizing infill and mixed-use development.

- *Which policies are key to enabling SACOG to meet its target?*

All interviewees iterated the key components of SB 375 in response to this question – they stated that incentivizing more infill housing development and improving



public transit were key. However, they said these policies alone would not be enough; other strategies would be needed, such as road pricing policies (as noted by two interviewees), which would charge individuals an amount based on how much they are driving. One interviewee in particular stressed that successfully reaching the emissions reduction target requires behavioral changes at the individual level, and the best way to help people change their behavior is through financial incentives or disincentives. This interviewee further expressed that the region, and the state overall, would have to impose strong pricing policies to send the appropriate signals to individuals and the market to influence their behavior.

- *SACOG is required to reduce GHG emissions through better land use planning. How does this affect your local planning?*

Once more, interviewees provided a range of responses. In particular, one interviewee noted that SB 375 does not affect their local planning at all because of the lack of growth in their area – they were driving growth into the already urbanized areas. Other responses included: 1) all interviewees stated that SB 375 changed their local planning by forcing them to make their transportation projects SB 375-consistent to access federal transportation funding; 2) one interviewee said they adjusted their growth boundaries to delay development in certain areas to help the region maintain consistency with the SCS; 3) two interviewees said they updated their general plan to be consistent with SACOG’s SCS, and; 4) three interviewees said they were incorporating more

mixed-use development opportunities and two interviewees in particular were setting higher housing density targets.

- *What benefits/advantages does SB 375 pose to your local planning efforts? What barriers/challenges does SB 375 pose to your local planning efforts?*

All the local jurisdictions I interviewed consistently cited the funding they receive as the primary benefit of SB 375. They also said there are CEQA benefits, but that they took little advantage of it because of its narrow applicability to projects. One interviewee said that much of the competitive SB 375 funding doled out is directed toward disadvantaged communities, making it difficult for jurisdictions that do not have disadvantaged communities to compete for it.

As for challenges SB 375 creates for their local planning, most jurisdictions said it doesn't create any problem for them at all. However, one interviewee stated that SB 375 does add additional requirements that have cost implications for projects. For instance, SB 375 imposed complete streets planning for local jurisdictions – whenever they retrofit roads they have to upgrade the area to add bicycle lanes, pedestrian walkways, street lamps, etc. if the area does not already have those things. This, the interviewee said, imposes additional costs that can be onerous to local governments.

- *Is there sufficient federal, state, and local funding to implement SB 375? How much is needed?*

All interviewees answered this question with a resounding “no”. Some projected that the needed funding to get SB 375 right is on the order of hundreds of millions at the very least. One interviewee offered an interesting perspective on the issue of funding – specifically, they stated that additional funding doesn’t necessarily solve the problem. When looking at planning long-term, SB 375 will save local jurisdictions funding through reduced infrastructure maintenance and upkeep and ultimately reduced sprawl throughout a community. Reduced sprawl also means a local jurisdiction deals with less traffic congestion and therefore has less traffic impacts. These reductions in transportation infrastructure maintenance costs can be increased further by investments in public transit, which will take even more vehicles off the road.

- *What barriers is Sacramento facing for SB 375 implementation? What is SACOG doing to overcome this? What are local governments doing to overcome this?*

Interviewees had a diverse set of responses to this question. . One interviewee cited SB 375’s structural flaw that has been identified by existing literature – there is a disconnect between local’s plans and SACOG’s SCS. SB 375 does not require consistency between these plans. However, all interviewees did collectively identify funding as a key barrier, and four interviewees noted that lack of market acceptance of more costly infill housing was a barrier too. These same four interviewees stated that Sacramento lacks the demographics that create market demand for SB 375-type housing.

One interviewee said that other barriers discussed included local governments lacking staff capacity to pursue competitive grant funding for sustainable growth management practices, and another interviewee said that not everyone among the local jurisdictions is doing their part to help Sacramento reach its SB 375 target. Finally, one interviewee also stated that there is too much money in building sprawl; the current land use development patterns are very profitable.

To overcome this, all interviewees stated that SACOG is doing its part to provide planning guidance and assistance to the locals to help make their projects more SB 375 compliant, providing policy guidance as jurisdictions update their general plans and zoning regulations to support SB 375 projects, as well as identify funding opportunities and actually give local jurisdictions grants to conduct sustainable growth planning efforts. They all also stated that SACOG has changed the nature of the conversation around land use planning, and that many local governments are also pursuing a patchwork of strategies to help Sacramento reach its target – whether its updating its land use regulations, pursuing funding opportunities, or participating in SACOG SB 375 forums – many are trying to drive their growth into their downtowns.

- *What is the state doing to help Sacramento implement SB 375? Should they be doing more, and if so, what?*

Four interviewees cited Strategic Growth Council's (SGC) Affordable Housing & Sustainable Communities grant program as a valuable resource to helping implement SB

375 in Sacramento. One interviewee discussed the fact that the state signed into law legislation that changed how local jurisdictions calculate traffic impacts of CEQA purposes, which now evaluates traffic on a VMT basis. Beyond these, interviewees focused more on discussing how the state needed to do more to help Sacramento. In particular, they all said the state should provide more funding. One interviewed stressed the importance of CEQA to better incorporate SB 375. Another interviewee suggested that the state should require cities and counties to develop regional tax sharing agreements to prevent the fiscalization of land use. Yet another interviewee asked that the state provide stronger implementation support and guidance for locals when signing complicated legislation into law like SB 375. They said they felt the state gave the locals a directive without providing them the proper guidance needed to actually succeed at implementation. One interviewee also suggested that the state should develop a state program that conducts targeted outreach to towns and cities to help them become more SB 375 compliant. Finally, three interviewees said there should be closer coordination between state agencies, including giving SGC and Office of Planning & Research (OPR) a stronger oversight and facilitation role in implementation. As it currently stands, SGC and OPR lack the appropriate resources and staff to provide holistic support across state agencies and with the MPOs to help with land use planning efforts.

- *What challenges does SACOG's 2035 VMT reduction target pose for the region? What tools, policies, and incentives does SACOG and its members need to hit that target?*

Interviewees responded by offering a plethora of solutions. To maintain pace with the 2035 target, which will be increasingly hard given the increase in population, interviewees stated that funding will be key. They also added that investments in utility and transportation infrastructure will be critical to allowing for more infill development, as well as Sacramento needing to diversify employment centers that attracts a broad economic base and provides high-wage jobs. Others also stated that more aggressive policies, such as road pricing policies that force individual behavior changes, will be key to enabling greater emissions reductions.

## **Chapter Five**

### INTERPRETATIONS

In this chapter I offer answers to the large questions that drove my research effort. They include: 1) Is Sacramento meeting its GHG reduction target? 2) What are the benefits and disadvantages to SB 375, along with the barriers to implementation? 3) What tools, policies, and incentives are needed to reach an increased 2035 target? Additionally, I discuss the policy implications of my findings.

#### **Is Sacramento Meeting its GHG Reduction Target?**

Based on my interviews, SACOG projects it will achieve an eight percent reduction in GHG emissions by 2020, one percent above their requirement. This is good news for Sacramento – and consistent with existing literature pointing to SACOG and Sacramento as the most well poised region for emissions reductions. However, this calculation is a prediction, determined using complex forecast modeling that builds in layers upon layers of assumptions of future land use decisions in the region. Furthermore, this is not a static calculation – SACOG first forecast this reduction in emissions in 2012 and has not revisited the modeling to determine if many of its land use assumptions remain accurate. SACOG will not know the full outcome in emissions reductions until it revisits the model and updates its SCS, which should be occurring later this year. However, SACOG’s projection is reinforced by ARB’s own separate analysis that corroborates SACOG’s conclusion, reinforcing the credibility of SACOG’s data.

This conclusion suggests SB 375 is working in the Sacramento region. However, my research indicates that SB 375 is not the sole driver with local governments for emissions reductions. Many jurisdictions were already practicing sustainable growth management practices before the inception of SB 375, and this legislation instead formalized an existing process and provided local jurisdictions an additional tool in the toolbox. As one interviewee proclaimed in our interview, SB 375, while helpful and important, merely accelerated their personal timeline in implementing these kinds of sustainable growth management policies.. For these jurisdictions, SB 375 did not change for them, but rather bolstered this mindset with these additional planning, funding, and implementation tools.

However, there is a different story for my other interviewees. They stated that SB 375 changed the nature of the conversation in their land use planning. If not for the legislation, they would not have given as great of consideration to sustainable growth management practices, such as infill development, developing additional public transit stops closer to housing development, building more walkable and bike-able communities, etc. This tells me, that for some jurisdictions, SB 375 may have created a cultural shift in land use planning by introducing local governments to sustainable growth management practices that had not already been considering them.

In this respect, SB 375 has helped shape land use policy, but it has not single-handedly revolutionized how land use planning decisions are made. Even now, nearly ten years later, local governments still lack complete consistency between their local planning and SB 375, and continue to grapple with barriers to implementation. However,



SB 375 has formally created state policy that both the MPOs and local governments can point back to as guiding documentation when trying to guide their land use decisions.

### **SB 375's Benefits, Disadvantages, and Barriers to Implementation**

Based on my interviews, SB 375 seems to offer more benefits than it does disadvantages to local planning efforts. Even so, most respondents who were local planners said that the primary benefit of SB 375 planning was the funding they could access. Respondents focused on the money they could access for their projects, rather than the environmental and health benefits that can be gained from SB 375-type planning. Therefore, there could be a need to continue educating about the value and benefits of sustainable growth management practices for many local governments in Sacramento to advance implementation efforts.

Respondents did not cite any disadvantages to SB 375. However, this could be more a result of the fact that SB 375 has no real enforcement mechanism, letting MPOs and locals escape penalties should they fail to comply. This suggests that SB 375 may not been as especially burdensome despite the implementation challenges precisely because of the limited accountability for meeting legislative goals.

Additionally, my research highlighted three larger contextual barriers to implementation the MPOs and local governments are up against in their effort to make more sustainable land use changes. These issues provide a broader context to the SB 375 conversation that underscore just how hard it is to implement this legislation, which made them worth underscoring as part of the results of my research.

First, powerful market forces drive land use decisions – as one interviewee stated, there is too much money to be had from building sprawl. While this may seem like an obvious fact to those working in the space, I thought this was an important implication – how are local governments and ultimately SACOG supposed to fight against broader market forces that will develop land in a moment’s notice for profit? Development, especially highly profitable development (such as an auto mall) provides local governments with considerable tax revenues, bolstering their coffers. With these kinds of incentives at play, the choice is easy for some jurisdictions to make these kinds of traditional land use decisions. While SB 375 skirts around the edges of these forces with its own set of financial incentives, this seems like an ever-persistent issue that the MPOs and their local governments will always face.

Second, Sacramento, and most likely other parts of the state, lack the demographics and high-wage job base that is needed to support the more expensive infill housing market. It is significantly cheaper for developers to build on the urban edge; my interviewees pointed that building significant amounts of infill housing will require market support. People need to be willing and able to pay higher costs for more centrally located housing. People ultimately need to value SB 375 principles when it comes to the community they live in – centrally located housing, access to public transit, walkable and bike-able communities - all of these things increase costs. Of course, people’s income level will most likely be highly correlated to their ability to pay to live in SB 375-developed communities.

Third, if the Sacramento region is going to succeed at significant emissions reductions, people's individual behaviors and habits will ultimately need to change. Sacramento can invest in as much public transit as it wants, but in the end people need to want to take public transit. People need to see the value in walking or biking over driving. Widespread change will need to occur in the minds of Sacramento's residents; this will be no small feat.

### **How Are We Going to Reach the 2035 Target?**

As my research pointed out, there are several areas of improvement to SB 375 – each which would help facilitate stronger implementation not only for the 2020 target, but the 2035 target as well. Reaching the 2035 target will require additional effort from the MPOs and local governments to more deeply integrate SB 375-policies with their land use culture. Based on my research, below I will discuss potential policy actions the state could take to help facilitate stronger implementation of SB 375, thus helping to better meet its GHG emissions reduction target for 2020 and 2035 respectively. They are as follows:

1. **Continue to encourage public officials and civil service staff at local governments to better incorporate SB 375 principles in their general plans and zoning regulations through local outreach** - general plans and zoning regulations are the policy foundation for land use decision. Local governments will need to continue to upgrade this foundation to allow more SB 375 development to take place. As one interviewee stated, they need to be able to

point back to critical, guiding documents such as their general plan to justify their land use decisions. This could be achieved by developing a dedicated SB 375 state outreach program. While the MPOs do provide local governments competitive grants for SB 375-type activities, there is no dedicated state program that conducts outreach to cities and towns specifically for the purposes of helping them making their communities more SB 375-compliant, either through better planning, updating general plans and zoning regulations, helping them build more sustainable projects, or providing general policy assistance.

2. **Reform CEQA to allow local governments to cash in on the value of SB 375 projects** – As one interviewee pointed out, CEQA evaluates projects on a project-by-project basis; it does not take regional planning into account. Therefore, when a developer plans a project for a specific area, CEQA does not take into account the fact that the project could have been located somewhere else that would have been less SB 375-compliant. While developers can be rewarded with CEQA streamlining for qualifying SB 375-compliant projects, this incentive is narrowly applicable, and therefore its value is limited. This value could be improved greatly by taking regional planning into account, and allowing developers to “cash in” on locating their projects in infill areas over the urban edge.
3. **Create an innovative financing mechanism specifically for SB 375 projects.**  
As interviewees discussed, funding is a primary barrier to SB 375 implementation, and will most likely always be a barrier, given the magnitude of

costs of implementation. Developing additional funding mechanisms to be used to support SB 375-type projects will help ease this barrier.

While Sacramento is on track to meet its GHG emissions reduction target, SB 375 seemingly only bolsters efforts some Sacramento region local governments are already pursuing to implement sustainable growth management practices. For other local governments in the area, SB 375 has somewhat altered the tone of conversation around land use planning, opening them up to begin pursuing these kinds of policies as well. Implementing SB 375 will continue to face several key barriers, education and funding being two of the biggest. Local governments could use assistance from the state to better understand how to implement sustainable growth management practices, and providing additional funding sources and financing mechanisms will help support implementation to reach the 2035 GHG emissions reduction target.

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