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An analysis of subnational net zero targets & recommendations for the Federal Government

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Leveling up net zero climate leadership in the United States: An analysis of subnational net zero targets & recommendations for the Federal Government

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Executive Summary

- As the Biden-Harris administration recommits the US to the Paris Agreement, a robust national net zero emissions strategy, integrated with local and corporate decarbonization targets, will ensure the nation achieves its climate goals. A new nationwide survey of current net zero climate commitments reveals the following:
- The US has a broad foundation of local net zero ambition** on which to build a robust national decarbonization pathway. At least **53% of Americans** live in a jurisdiction with a subnational net zero target. Furthermore, US companies accounting for at least **\$5.2 trillion** in yearly sales have committed to net zero.
- Discrepancies in the quality of these targets** highlight the need for strong federal leadership to raise the bar for existing subnational and corporate targets and spur further ambition to meet the goals laid out in the Paris Agreement.¹
- Existing state, local and private sector targets require improved alignment** in governance mechanisms, consideration of equity and use of offsets.
- To achieve net zero emissions in the US by 2050 in an equitable, just, and least-cost manner**, the White House Climate Task Force and Congress should enact policies to strategically strengthen and grow subnational and corporate ambition. In conjunction, subnational and corporate actors must continue to set and improve upon existing targets.
- Our empirical findings indicate a strong basis of support for federal policymakers** to implement a **robust national net zero strategy**. Four key policies will enable government leaders to connect ambition to action:
 - Pledge:** Include a robust net zero pledge in the US' Nationally Determined Contribution (NDC) submission that exceeds the United Nations Framework Convention on Climate Change (UNFCCC) [Race to Zero](#) minimum criteria and adopts key leadership practices. These practices include creating a pledge that is codified in law, covers all greenhouse gases across operations and supply chains and includes an interim target of **50% emissions reductions by 2030**.
 - Plan:** Publish a national net zero roadmap that includes considerations of **equity and justice** and places constraints on the role of **offsets**.
 - Proceed:** Align **economic recovery spending** with the aims of the net zero target, develop sector-specific net zero **benchmarks and template strategies** and mandate net zero alignment as a **condition for federal bailouts**.
 - Publish:** Publish an **annual** national progress report that includes the progress of **subnational** commitments.

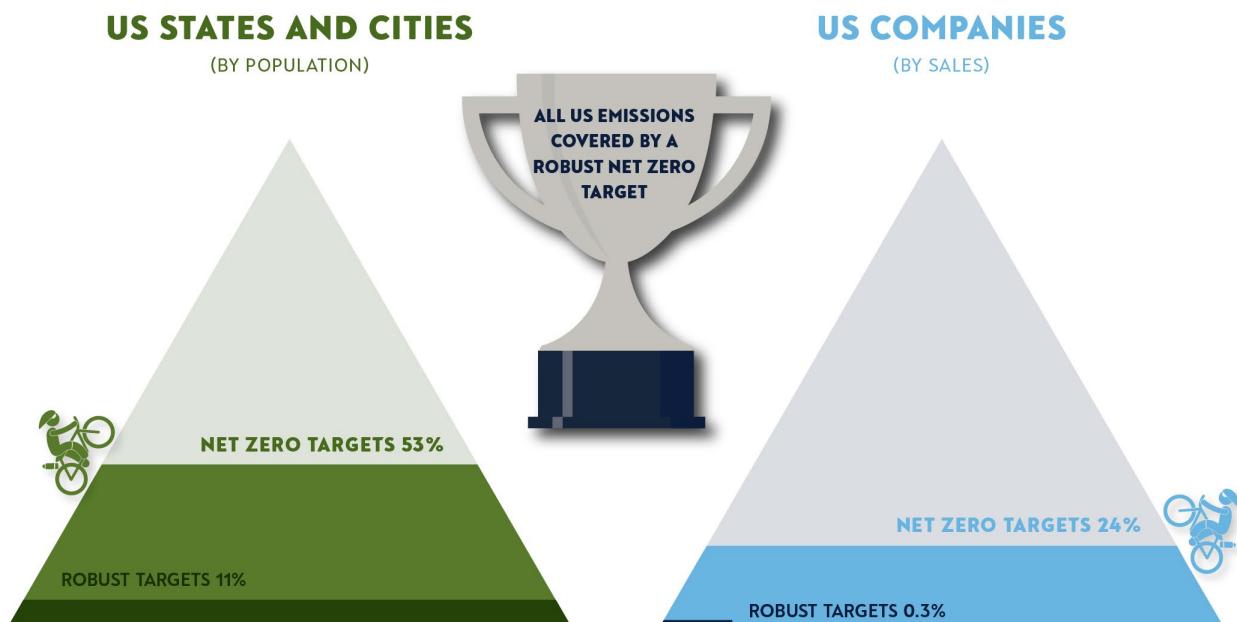
1. Introduction

To restore US climate leadership, the federal government, in concert with subnational public and private actors, must take decisive action.²

Achieving net zero emissions is an essential and achievable goal in the US. The challenge is one of governance and coordination, not of cost. A recent study from Princeton University finds that pursuing net zero by 2050 is affordable in the US, requiring a mere 3% increase in annual federal energy expenditures over the next decade.³ Even so, the societal and economic transition to net zero emissions requires robust, long-term and inclusive planning due to the unprecedented scale and urgency of setting a plan into motion.

This report focuses on the critical policy infrastructure of net zero emissions targets. We identify key policy opportunities to drive the development of strong subnational and corporate climate commitments, and to align recovery spending with a robust, national net zero strategy. The report proceeds as follows: first, we contextualize US progress globally, before analyzing the robustness of subnational and private net zero targets. We then identify opportunities for a national strategy to support and extend this ambition and fill in gaps in the architecture of current targets. Our findings offer insights to policymakers, particularly to members of Congress and the Biden-Harris Administration.

Figure 1. Current progress towards 100% coverage of net zero targets in the US, independent of a federal target. Population coverage of states and large city targets is measured as a percentage of the US population in 2019. Large company coverage is measured as a percentage of US gross domestic product in 2019.



2. Net Zero Stocktake

A global wave of net zero pledges by countries, states, cities and companies made 2020 a historic year for climate ambition. Heads of state in China, Japan, South Korea, South Africa and Canada, as well as the new President of the US, made groundbreaking pledges to achieve territorial net zero emissions in their respective nations by mid-century. As of January 2021, 127 countries were considering or had adopted a net zero target, representing 65% of global CO₂ emissions.⁴ Recent modelling by Carbon Action Tracker finds that these net zero commitments keep the goals of the Paris Agreement within reach.⁵

Subnational actors have kept the US engaged in the global effort to mitigate climate change. A recent study by America's Pledge, now America Is All In, found that by the end of 2020, 65% of the US population, 68% of US GDP and 51% of US GHG emissions were covered by some form of climate commitment: either as a net zero target or a partial decarbonization target.⁶ If fulfilled, these existing commitments by US cities, states and companies would deliver a 25% reduction in US emissions below 2005 levels by 2030. With strong federal policies, such as setting a renewable energy standard, phasing-out coal, regulating methane and incentivizing EVs, emission reductions could reach 49% by 2030, aligning with the IPCC recommendations for meeting the 1.5°C goal stated in the Paris Agreement.^{7,8} However, delivering on this ambition will require federal policy to coalesce around a roadmap with clear criteria to align subnational and private sector targets behind this aim.

Box 1. Race to Zero Starting Line Criteria

Led by the High-Level Climate Champions for Climate Action, the UNFCCC Race to Zero mobilizes diverse actors to join the Climate Ambition Alliance. The minimum “starting line” criteria for participation in the campaign are:

- **Pledge:** Pledge at the head-of-organization level to reach net zero by midcentury at the latest, in line with global efforts to limit warming to 1.5°C.
- **Plan:** In advance of COP26, explain what steps will be taken toward achieving net zero, especially in the short- and medium-term. Set an interim target to achieve in the next decade, reflecting a fair share of the 50% global reduction in CO₂ by 2030, following the IPCC Special Report on Global Warming of 1.5°C.
- **Proceed:** Take immediate action toward achieving net zero, consistent with delivering interim targets specified.
- **Publish:** Commit to reporting progress annually, including via data platforms that feed into the UNFCCC Global Climate Action Portal.

Additionally, the Race to Zero details two **leadership practices**: first, to cover all greenhouse gas emissions (Scopes 1–3), including value chain and territorial emissions; and second, to place limitations and conditions on offsetting.

Source: UNFCCC (2020). [Defining the ‘Starting Line.’](#) UNFCCC Race to Zero Campaign.

We conducted a national stocktake of net zero climate commitments in all 50 US states, US cities over 500,000 inhabitants and US-headquartered companies on the Forbes Global 2000.¹ The criteria we used to evaluate US net zero commitments draw on those developed by the UNFCCC Race to Zero campaign (see Box 1 for further details).⁹

Our findings show that while the US has a foundation of local net zero ambition, subnational targets vary significantly in their measurement criteria and regulatory mechanisms. Policy gaps emerge in the variability of timelines, accountability measures, scope of emission coverage, offsetting standards and consideration of equity.

We make six key observations:

- **Net zero targets cover a substantial portion of the US population and economy.** Our data shows that at least **53% of the US population**, or 173 million people, are currently covered by an existing city or state net zero target. A further five states and nine cities, accounting for 32 million people, have recently proposed targets, which could raise this figure to 62% of the US population.² Furthermore, US companies with at least **\$5.2 trillion in yearly sales**, or over 30% of the companies in the US by sales, also have targets.¹⁰ As of February 2021, targets had been set or had been proposed by:
 - **17 US states;**
 - **34 US cities**, comprising by number 37% of the 93 US cities with a population over 500,000;
 - **132 US companies**, comprising by number 23% of the 585 US companies in the Forbes Global 2000.
- **Private sector actors are leading by setting and achieving early targets.** Fourteen US companies, representing \$320 billion in yearly sales, have already reported achieving net zero. Of these, four report achieving decarbonization across their entire value chain.³ By the **end of this decade**, 59 US companies, representing **\$2.2 trillion in yearly sales**, aim to reach net zero. In addition, a total of 76 companies, representing \$3.7 trillion in yearly sales, have pledged to reach net zero by 2040.
- **Only a handful of US actors' current targets are truly robust.** We define a robust target as meeting both the starting line criteria and leadership practices developed by the Race to Zero campaign (see Box 1).¹¹ Based on publicly available data, New York State, four US cities—Austin, Sacramento, Los Angeles and New York City—and two US

¹ Data collected through a research collaboration between the University of Oxford and the Energy & Climate Intelligence Unit. See forthcoming publication conducting a global assessment: Hale et al. (2021) *The rapidly emerging landscape of net zero targets*.

² These figures account for double counting of populations that are covered by both a city and state target.

³ Value chain emissions are often referred to as Scope 3 emissions. Scope 1 refers to direct emissions and Scope 2 refers to indirect emissions from purchased energy.

companies—Equinor and American Express—meet these criteria (see Appendix 1 for entity-specific information).

- **Cities and states outperform companies in creating binding targets.** **Six states** have legislated a net zero target, including Hawaii, Maine, Nevada, New York, Virginia and Washington. Four states have enacted a target through executive order, including California (now debating legislation), Louisiana, Michigan and Montana. Together, these state directives cover 97 million people. Twenty-four cities have enacted a target through a city council resolution or municipal planning document.
- **Cities are leading the way on integrating equity considerations into their net zero plans.** **Twenty-six cities** explicitly consider equity and justice in their pathways, while only nine states and three companies do so. These mentions of equity vary widely in definitional and strategic terms, suggesting a need for coordination to ensure that equity is appropriately integrated in the development of net zero pathways.
- **Companies outperform cities and states in placing restrictions on the quantity and quality of offsets.** Twelve US companies, representing \$768 billion in yearly sales, plan to achieve net zero without use of offsets, and 18 companies, representing an additional \$1.2 trillion in yearly sales, plan to restrict the amount or type of offsets used. Three US states, representing 22 million inhabitants, and nine cities, representing 57 million Americans, plan to restrict the amount or type of offsets used to achieve net zero.

These variations in quality and credibility highlight the need for strong federal leadership to raise the bar on existing targets and spur further ambition. A national net zero target should build upon these frameworks to forge a just transition and more equitable future.

Figure 2. Map of US state and city net zero targets, shaded by alignment with the Race to Zero criteria. Targets that do not yet meet the starting line criteria are labeled as “in-progress” and are grouped with in-discussion, or “aspirational” targets. Targets that meet the starting line criteria are labeled “good,” and targets that additionally meet the leadership practices are labeled “robust.” Alaska, off-map, does not have a target. See Appendix 2 for data.



3. Net Zero Leadership Examples

By creating a national net zero target and setting benchmarks to standardize subnational goals, the federal government has the opportunity to create a national framework that stipulates criteria that should feature in any US net zero target. The Race to Zero criteria offer a starting point. **We find several examples of current US targets leading on different aspects of the criteria:**

- **Timing:** Robust commitments pledge to achieve net zero by 2050 or sooner. [Hawaii](#) has committed in law to net zero emissions and to 100% renewable energy by 2045, publishing progress on a real-time dashboard of various sustainability benchmarks.¹²
- **Scope:** Robust net zero pledges cover all greenhouse gas emissions across the value chain. In January 2021, [General Motors](#) committed to net zero emissions by 2040. Crucially, their target included eliminating Scope 3 emissions, which accounted for 98% of GM's emissions in 2019.¹³
- **Interim Targets:** Robust net zero targets detail short- and medium-term checkpoints. As part of its net zero target, the state of [Michigan](#) has published a detailed roadmap, including a goal to reduce emissions by 28% by 2025, relative to 1990 levels.¹⁴
- **Equity:** Robust net zero strategies attune decarbonization practices and pathways to issues of equity.¹⁵ [New York State](#), as part of its net zero plan, created a working group specifically tasked with monitoring social consequences of its transition, such as worker displacement.¹⁶ Similarly, [Los Angeles'](#) net zero plan highlights "a responsibility to deliver environmental justice and equity through an inclusive economy."¹⁷ On the whole, we find that the terms equity and justice are referenced inconsistently across net zero commitments and require further elaboration.
- **Offsetting:** Robust net zero strategies set standards for offsetting emissions and limit the use of these offsets to the mitigation of residual emissions. [Microsoft](#), which committed to carbon negativity by 2030, has published extensive criteria regarding its standards for carbon removal, including a 30-page white paper on the subject, much of which breaks new ground for corporate governance of carbon removal.¹⁸

These examples illustrate the actionability of the Race to Zero criteria and leadership practices, providing a starting line for the US to promote robust target-setting across actor groups and sectors. In addition to these examples of criteria-specific leadership, Appendix 1 includes further information on robust US targets that lead on all aspects of the criteria.

4. Policy Recommendations

By rejoining the Paris Agreement and foregrounding the announcement of a national net zero target, the Biden-Harris Administration lays an important foundation for national climate action. The findings of this report demonstrate the need to further support US climate federalism by strengthening existing net zero targets by subnational actors and promoting pathway planning among slow-to-transition localities and harder-to-abate sectors of the economy.

To jump-start progress, the Administration, in coordination with Congress, can catalyze a new era of US climate leadership by pursuing an integrated, national net zero strategy that includes the following measures:

Pledge: The Biden-Harris administration has indicated that on Earth Day, April 22 2021, the US will submit a new NDC to the UNFCCC.¹⁹ The administration has also indicated support for a Paris-aligned net zero target.²⁰ In addition to these anticipated actions, it is critical that the US contribution exceed the Race to Zero starting line criteria and meet the leadership practices.²¹ This national target should:

- **Be codified in law** by way of congressional legislation following the passage of a presidential executive order;
- **Include an interim target of at least 50% emission reductions by 2030** to provide strong political and economic signaling and align with the recommendations of the IPCC Special Report on Global Warming of 1.5°C;²²
- **Cover all greenhouse gases, and both territorial and supply chain emissions.**

Plan: The White House Executive Order on Tackling the Climate Crisis at Home and Abroad calls for the creation of a Climate Task Force to facilitate the organization and deployment of a Government-wide approach to combat the climate crisis.²³ Our report highlights the need for this body and related agencies to partner with subnational leaders to accelerate local and private-sector climate ambition. To ensure transparency and accountability, these goals should be published in a **comprehensive roadmap**, which should:

- **Establish a framework for subnational net zero commitments;**
- **Address existing equity and justice issues**, and how they will be affected by the transition to net zero;
- **Clearly identify conditions and parameters on offsetting**, such as only using high-quality offsets for residual emissions.²⁴

Proceed: The federal government has a valuable window of opportunity to kick-start the net zero transition by **aligning infrastructure investment, government procurement and economic recovery spending with net zero aims, such as by placing conditions on bailouts in heavy emitting sectors.**²⁵ We recommend:

- **Aligning infrastructure investment and government procurement with net zero climate plans.** As the administration rolls out internal recovery spending, it can align infrastructure investment with the goals of delivering a robust net zero strategy by well before 2050. Achieving net zero will also require new federal procurement standards to plan for net zero by 2050 by aligning construction, energy and transportation spending with low-carbon supply chains. These policies will also spur innovation in key sectors like cement and steel by rewarding low-carbon manufacturing.
- **Developing net zero benchmarks and template strategies for heavy emitting sectors.** Existing subnational net zero leadership provides the US with a valuable opportunity to convene actors currently in the process of developing net zero strategies. The Biden-Harris administration is well positioned to facilitate a stakeholder consultation process to develop benchmarks and template strategies for best practice on net zero commitment, especially for heavy emitting sectors. These can be used as a basis for conditional bailouts and other policies to regulate and incentivize meaningful action towards net zero.
- **Implementing conditional bailouts for any non-green recovery spending.** For spending that supports heavy-emitting sectors, the federal government can advance a policy of conditional bailouts requiring corporate recipients of federal recovery funding to create robust net zero strategies. Oxford's global analysis of COVID-19 economic recovery packages has demonstrated that unconditional bailouts of heavy emitting sectors, such as the airline industry, perform worst among all reviewed recovery policies on both economic and climate metrics.²⁶ By developing a stakeholder-inclusive and rigorous policy on climate-aligned bailouts, the US can align economic recovery spending with climate change mitigation goals to build a more resilient economy.

Publish: Finally, like any other robust net zero strategy, the US will need a reporting framework that includes:

- **Annual reporting by the White House Climate Task Force**, including on the progress of subnational commitments and their alignment with key criteria.
- **Federally standardized reporting tools and frameworks** for agencies, subnational actors and private firms to communicate progress.



POLICY RECOMMENDATIONS

US FEDERAL LEADERSHIP OPPORTUNITIES ON NET ZERO

The Biden-Harris Administration, in coordination with Congress, can catalyze a new era of US climate leadership and adopt global best practices on net zero target setting by:

1. PLEDGE a robust US net zero target. In other words:

- Codify the target in law
- Include an interim target of at least 50% emission reductions by 2030
- Cover all greenhouse gases across supply chains

2. PLAN a comprehensive net zero roadmap to ensure transparency and accountability:

- Establish criteria for subnational net zero committers
- Address existing equity and justice issues and those that could be created by the transition to net zero
- Clearly identify conditions and limitations on offsetting

3. PROCEED by harmonizing federal recovery spending and policy frameworks with net zero:

- Align infrastructure investment, government procurement and recovery spending with a net zero trajectory
- Develop net zero benchmarks and template strategies, especially for heavy emitting sectors
- Implement conditional bailouts for recovery spending that may be non-green

4. PUBLISH annual updates on federal, subnational and corporate progress towards net zero goals:

- Develop standardized reporting tools and frameworks for this purpose through the White House Climate Task Force and Office of Climate Policy
- Include opportunities for updates on progress towards alignment with determined net zero criteria, in addition to progress on short-term emissions reductions.

4. Conclusions

The federal government has an important opportunity to level up subnational and private sector climate action as part of a national net zero strategy. Doing so would send a strong signal to industry, subnational actors and other national governments by illustrating the depth and seriousness of the US' commitment. The federal government can use these high-level principles to create specific benchmarks and template strategies for industry, cities and states to ensure that action at all levels is robust and successful. These interventions would increase climate policy legibility, open up coordination across sectors and regions, and highlight pathways for local regulators to monitor, incentivize and enforce targets in their own jurisdictions. In this way, federal leadership can advance the speed and scale of American climate federalism, generating returns for communities, industry and the planet.

There has never been a more urgent time to lead on climate. Policymakers should leverage the base of support identified in this report to further accelerate the net zero transition in the US. By centering climate discourse on net zero emissions and targeting recovery spending to accelerate the transition, the Biden-Harris administration can begin this decisive decade with evidence-based policy that upholds the nation's commitment to averting climate catastrophe.

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Cover photo: "[Curved Road by Wind Turbines](#)" by Image Catalog is marked with CC0 1.0.

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Appendix 1. Robust Net Zero Targets in the US

The following subnational and corporate actors have particularly strong targets when evaluated against the Race to Zero criteria: Los Angeles, New York City, Sacramento, Austin, New York State, American Express and Equinor. They span across diverse regions, sizes and sectors, offering a representative sampling of how net zero targets can maintain a shared, high level of ambition while being tailored to local needs. We highlight four here and further elucidate the full group of robust targets in the tables below.

Los Angeles: The city of Los Angeles has a target to go carbon neutral by 2050 with an interim target of cutting GHGs to 50% below 1990 levels by 2025 and 73% below 1990 levels by 2035. Additional operational plans integrated as part of this target include goals to increase zero-emission vehicles on L.A.'s roads to 25% by 2025, 80% by 2035 and 100% by 2050. Los Angeles also outlines a governance requirement to report progress towards its climate targets at least annually. This target is also one of the few to incorporate considerations of equity and justice as a key principle of their climate plan including: "a responsibility to deliver environmental justice and equity through an inclusive economy, producing results at the community level, guided by communities themselves."¹

New York State: New York State has a net zero target across all GHGs by 2050 with a decarbonization target of 40% below 1990 levels by 2030, with no less than 85% below 1990 levels by 2050. **New York City** is another example of a target that considers equity, in this case with specific reference to a just transition and employment concerns. They aim to "advance our equity goals by ensuring quality employment opportunities in safe working environments."² To do so, they create a working group to study and report on: rate of creation of jobs that counter climate change, projections of the skills training needed to meet future job demand and workforce disruption due to decarbonizing the economy.

Equinor: An example from the energy sector comes from the US-headquartered oil and gas company, Equinor. Equinor's target, covering all GHGs, Scope 1 and 2, and partial coverage of Scope 3 emissions, is to be near zero by 2050 (as an absolute target) in Norway, and as a global entity—to reduce the net carbon intensity, from initial production to final consumption, of energy produced by at least 50% by 2050. Equinor's plan outlines interim targets to reduce emissions by 2030 through 5 million tonnes in annual reductions (10% of total annual Norwegian greenhouse gas emissions today). It also plans to reach carbon-neutral global operations by 2030 and to reduce absolute greenhouse gas emissions from its operated offshore fields and onshore plants in Norway by 40% by 2030, 70% by 2040 and towards near zero by 2050. It set some parameters as to how it plans to offset in its net zero plan. There is no explicit consideration of equity in its net zero strategy.³

¹City of Los Angeles (2019). [LA's Green New Deal](#).

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Table 1. Robust net zero targets by year, interim goals, status, planning and reporting

Name	Target Year	Interim Target	Status	Plan	Reporting
American Express	2025	100% renewable energy in the process	Achieved	Yes	At least annually
Equinor	2050	By 2030, reach carbon neutral global operations and achieve 5+ million tonnes in annual reductions	In corporate strategy	Yes	At least annually
New York State	2050	Reduce emissions 40% below 1990 levels by 2030	In law	Yes	At least annually
Austin	2050	Achieve carbon neutrality for City of Austin operations by 2020	In policy document	Yes	At least annually
New York City	2050	Achieve a 50 percent renewable electricity grid by 2030	In policy document	Yes	At least annually
Sacramento	2045	40% GHG reduction by 2030 below 1990 levels	In policy document	Yes	At least annually
Los Angeles	2045	Reduce municipal GHG emissions 55% by 2025 and 65% by 2035 from 2008 baseline levels	In policy document	Yes	At least annually

Table 2. Robust net zero targets by coverage, equity and offsets

Name	Gases	Scopes	Considers Equity	Offset Conditions	Limits Offset	Source
American Express	All GHGs	1, 2, 3	No	Not specified	Yes	Link
Equinor	All GHGs	1, 2, some 3	No	Offset mechanisms through natural sinks	No	Link
New York State	All GHGs	n/a	Yes	Must be high environmental integrity and avoid social harm	Yes, to 15%	Link
Austin	All GHGs	n/a	Yes	Only residual emissions	Yes, to 10%	Link
New York City	All GHGs	n/a	Yes	Only residual emissions	No	Link
Sacramento	All GHGs	n/a	Yes	No double counting	No	Link
Los Angeles	All GHGs	n/a	Yes	Only residual emissions	No	Link

Appendix 2. Reference Data for Figure 2

For more granular data please contact kate_cullen@berkeley.edu.

State	Status	State	Status
Alabama	No target	Oklahoma	No target
Alaska	No target	Oregon	No target
Arizona	No target	Pennsylvania	No target
Arkansas	No target	Rhode Island	In Progress/Aspirational
California	Good target	South Carolina	No target
Colorado	No target	South Dakota	No target
Connecticut	No target	Tennessee	No target
Delaware	No target	Texas	No target
Florida	No target	Utah	No target
Georgia	No target	Vermont	In Progress/Aspirational
Hawaii	Good target	Virginia	In Progress/Aspirational
Idaho	No target	Washington	In Progress/Aspirational
Illinois	No target	West Virginia	No target
Indiana	No target	Wisconsin	No target
Iowa	No target	Wyoming	No target
		City	Status
Kansas	No target	Birmingham	No target
Kentucky	No target	Tucson	In Progress/Aspirational
Louisiana	Good target	Phoenix-Mesa	In Progress/Aspirational
Maine	In Progress/Aspirational	Little Rock	No target
Maryland	Good target	Mission Viejo	No target
Massachusetts	In Progress/Aspirational	Riverside-San Bernardino	No target
Michigan	Good target	San Francisco-Oakland	In Progress/Aspirational
Minnesota	In Progress/Aspirational	Fresno	No target
Mississippi	No target	Sacramento	Robust target
Missouri	No target	Los Angeles-Long Beach-Santa Ana	Robust target
Montana	In Progress/Aspirational	Temecula-Murrieta	No target
Nebraska	No target	San Diego	No target
Nevada	Good target	Victorville-Hesperia-Apple Valley	No target
New Hampshire	In Progress/Aspirational	Bakersfield	No target
New Jersey	No target	Concord	No target
New Mexico	In Progress/Aspirational	San Jose	Good target
New York	Robust target	Colorado Springs	No target
North Carolina	No target	Denver-Aurora	Good target
North Dakota	No target	Bridgeport-Stamford	No target
Ohio	No target		

City	Status	City	Status
Hartford	No target	Greenville	No target
New Haven	No target	Raleigh	No target
Kissimmee	No target	Charlotte	No target
Sarasota-Bradenton	No target	Toledo	No target
Cape Coral	No target	Cincinnati	No target
Port St. Lucie	No target	Akron	No target
Miami	In Progress/Aspirational	Dayton	No target
Palm Bay-Melbourne	No target	Columbus, Ohio	In Progress/Aspirational
Jacksonville, Florida	No target	Cleveland	No target
Tampa-St. Petersburg	No target	Tulsa	No target
Orlando	Good target	Oklahoma City	No target
Atlanta	No target	Portland	Good target
Honolulu	Good target	Allentown-Bethlehem	No target
Chicago	In Progress/Aspirational	Harrisburg	No target
Indianapolis	Good target	Philadelphia	Good target
Des Moines	In Progress/Aspirational	Pittsburgh	Good target
Kansas City	In Progress/Aspirational	Providence	In Progress/Aspirational
Wichita	No target	Charleston	No target
Louisville	No target	Columbia, SC	No target
Baton Rouge	No target	Nashville-Davidson	No target
New Orleans	In Progress/Aspirational	Knoxville	No target
Baltimore	No target	Memphis	No target
Worcester	No target	Houston	In Progress/Aspirational
Springfield, MA, CT	No target	The Woodlands	No target
Boston	Good target	McAllen	No target
Grand Rapids	No target	San Antonio	Good target
Detroit	In Progress/Aspirational	Dallas-Fort Worth	Good target
Minneapolis-St. Paul	In Progress/Aspirational	El Paso	No target
St. Louis	In Progress/Aspirational	Austin	Robust target
Omaha	No target	Provo-Orem	No target
Las Vegas	No target	Salt Lake City	In Progress/Aspirational
Albuquerque	No target	Ogden-Layton	No target
Poughkeepsie-New B	No target	Virginia Beach	No target
Albany	No target	Richmond	In Progress/Aspirational
Rochester	No target	Seattle	In Progress/Aspirational
New York-Newark	Robust target	Milwaukee	In Progress/Aspirational
Buffalo	No target	Washington, D.C.	Good target