



# South Coast Air Quality Management District

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September 10, 2010

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California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95812

RE: Proposed Regional Greenhouse Gas Emission Reduction Targets  
for Automobiles and Light Trucks Pursuant to Senate Bill 375

Dear Chairwoman:

The South Coast Air Quality Management District (SCAQMD) Governing Board appreciates the opportunity to comment on the State's Proposed Regional Greenhouse Gas (GHG) Emission Reduction Targets pursuant to SB 375.

The transportation sector contributes significantly to California's criteria pollutant and GHG emissions, and further efforts to reduce emissions from this sector will be necessary to meet federal clean air standards as well as SB 375 requirements. Since transportation sources and land use patterns contribute significantly to California's GHG emissions, implementation of SB 375 is essential. SB 375 will also bring about many local air quality co-benefits. We commend the Metropolitan Planning Organizations for working diligently and collaboratively with the California Air Resources Board (CARB) in the last several months to develop regional GHG reduction targets. We offer the following comments on the proposed targets that CARB will be considering on September 23, 2010.

We continue to be concerned that each region has different modeling tools and capabilities to demonstrate compliance. We believe these differences have the potential to make comparisons between regions difficult or skewed. However, SCAQMD supports the targets expressed in percent per capita reduction from 2005 levels to help accommodate regional variation in growth rate, as recommended by the Regional Targets Advisory Committee (RTAC). Specifically, we support the

Regional Targets Advisory Committee (RTAC). Specifically, we support the ambitious, achievable targets developed for the SCAQMD region, provided technical and financial support is forthcoming at local, state, and federal levels. Since SB 375 provides for either a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) (in the event that adequate funding isn't available), the proposed targets can be supported, with the determination of what type of plan to submit left for a later date when more information is available. Also, land use and transportation planning has to be a part of the solution - not just for GHGs, but also to address local air quality problems.

We strongly urge CARB, working with the state legislature, to provide both financial and technical resources to Metropolitan Planning Organizations (MPOs) and local governments for their planning, program development, and program implementation efforts. This is essential to make the targets a reality. Without adequate funding, MPOs and local governments simply will not be able to afford to undertake the actions necessary to properly plan and implement transit-related projects that will be critical to the success of this effort. Examples where technical support is needed include best management practices and policies, and screening tools to quantify reductions. Best management practices are needed to strengthen and augment the SB 375 efforts, and modeling technologies must be improved and made more consistent to accurately assess progress.

In addition, we strongly recommend that CARB continue its efforts in developing reliable and consistent monitoring and tracking tools to ensure that reductions from an SCS are properly incorporated into future State Implementation Plans, since Regional Transportation Plans including SCS will form the basis for key SIP planning assumptions and transportation budgets.

It is imperative that federal, state, and local stakeholders work together to pay special attention to transit system expansion and development that will move toward zero emission technologies. This will complement transit-oriented development and address local air quality issues, as well.

SCAQMD remains committed to working with the Southern California Association of Governments and CARB on this important effort. Please call Dr. Barry Wallerstein at (909) 396-2100, if you have any questions regarding these comments.

Sincerely,



William A. Burke, Ed.D.,  
Chairman of the Board

cc: Hasan Ikhata, Executive Director, SCAG