San Joaquin Valley Regional Planning Agencies' Directors' Committee

c/o Tulare CAG ♦ 5961 S. Mooney Blvd. ♦ Visalia, California 93277 ♦ 559-733-6291 ♦ FAX 559-733-6291

Tulare County Association of Governments
Ted Smalley
Chair

Merced County Association of Governments
Jesse Brown
Vice Chair

Council of Fresno County Governments
Tony Boren

Kern Council of Governments
Ronald Brummett

Kings County Association of Governments
Terri King

Madera County Transportation Commission
Patricia Taylor

San Joaquin Council of Governments
Andrew Chesley

Stanislaus Council of Governments
Vince Harris

December 1, 2008

Mary D. Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: San Joaquin Valley Regional Planning Agencies' Directors' comments on the Climate Change Proposed Scoping Plan, Pursuant to AB32

Dear Chair Nichols,

On behalf of the San Joaquin Valley Regional Planning Agencies, we thank you for the opportunity to comment on the Climate Change Proposed Scoping Plan. The San Joaquin Valley Regional Planning Agencies are the Metropolitan Planning Organizations (MPOs) representing San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, Tulare and Kern Counties and are responsible for comprehensive regional transportation planning processes and the associated air quality requirements.

General Comments

The Directors of this eight county region commend the Air Resources Board (ARB) for its extensive effort to meet the challenging schedule and legislative goals of AB 32, the Global Warming Solutions Act of 2006. We support California's exemplary leadership in addressing climate change and the goal of substantially reducing the state's greenhouse gas emissions. We know you are fully aware that this is a difficult moment in California's economic and fiscal history to launch an initiative of this magnitude. As indicated below, many of our concerns are related to the resources needed to implement the scoping plan effectively. Financially stressed local government agencies are essential partners to the State in this effort. The eight-county San Joaquin Valley region is committed to doing its fair share to attain the reductions assigned to us in the Proposed Scoping Plan, but to do so the region will need considerable support from ARB and other state agencies.

The San Joaquin Valley eight county region faces a number of difficult challenges, some of which are unique. We are a geographically large, rapidly growing, and economically diverse region. The region has a number of major urban centers and yet is the state's largest agricultural region. We are particularly vulnerable to the adverse impacts of climate change, from the low-elevation, delta areas in the north to the heavily forested Sierra Nevada Range. The region has a hot summer climate and depends on snow pack runoff and large-scale water transfers to support our cities and our agricultural base. We have a diverse population that includes a large disadvantaged community that is particularly vulnerable to the impacts of poor air quality and climate change. We are a multi-jurisdictional and multi-pollutant nonattainment area that experiences some of the nation's worst air quality.

As we address our environmental problems, the eight county region faces absorbing a disproportionate share of California's population growth and higher than average vehicle trip demand because of such factors as our pattern of dispersed urban and rural communities, our agricultural economy, our scattered industrial and service centers, and the large volume of north-south truck traffic that regularly transits the region.

More Specific Comments

The Directors strongly concur with the California State Association of Counties' (CSAC) support of three policies:

- The regional approach, specifically voluntary, developed cooperatively between the State, regional, and local governments to reduce GHG emissions from land use and transportation.
- The effort to build upon existing Regional Blueprint Plans as a means to achieve GHG emissions reductions.
- Increased financial and technical assistance to local governments.

The region's local government revenues have been particularly hard hit by plummeting housing prices, the fallout from the State budget crisis, and the overall economic downturn. The eight county region will need considerable financial and technical assistance for modeling and expanded planning responsibilities. In particular we request:

- Stable sources of funding for long term planning and implementation.
- Full funding of public transit, which will be essential to meeting regional targets as well as funding for other emission reducing measures.
- Incentives for local governments to pay for energy efficiency/renewable energy projects with long-term payback periods.

In the implementation of SB 375 (Steinberg) which ties the GHG emission reduction goals of AB 32 to transportation, housing and regional land use, particular consideration should be given to the region's current planning processes and timelines. For example, the current projections show the San Joaquin Valley MPOs will be adopting regional plans prior to ARB's adoption of final GHG targets. Because of the diverse circumstances across the region, we request regional representation and participation from all eight Valley MPOs on the Regional Target Advisory Committee.

We support California's participation in the Western Climate Initiative greenhouse gas cap-and-trade program because of its potential to bring about substantial reductions at lower cost and ability to reduce or prevent the economic leakage to other states that would likely occur with a California-only cap-and-trade program.

The State needs to consider unintended consequences as it moves forward on CEQA guidelines for considering climate change and related reforms envisioned in SB 375. As one example there should be incentives to make infill development easier to build than low density development. It is not productive for a CEQA document to call out a higher density, smart growth project as having significant impacts that can be mitigated by lowering density, as is often the case now.

Thank you for the opportunity to submit comments. For any questions, please contact Lauren Dawson, Council of Fresno County Governments at 559-233-4148.

Sincerely,

Ted Smalley
Chair, SJV Regional Planning Agencies' Directors' Committee

cc: Linda S. Adams, CalEPA
James N. Goldstene, California Air Resources Board
Members, California Air Resources Board