MADERA CTC
Madera County Transportation Commission

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OFFICE OF THE CHAIRMAN
AIR RESOURCES BOARD

June 23, 2010

Ms. Mary D. Nichols, Chairperson
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Dear Chairperson Nichols:

RE: Madera County Regional SB 375 Proposed Target

The Madera County Transportation Commission (MCTC) has enclosed recommended greenhouse gas reduction targets for the Madera County region pursuant to the requirements of SB 375 and the recommendations of the Regional Targets Advisory Committee (RTAC). After careful analysis of alternative scenarios, including one based on the land use changes included in the Madera County Blueprint preferred scenario, we have elected to submit the baseline greenhouse gas analysis for your consideration in the SB 375 target-setting process.

The lack of available modeling tools in the San Joaquin Valley and the relatively short timeline for submitting targets to ARB have made it difficult to produce targets that take into account all of the benefits of smart growth planning.

MCTC modeling capabilities are currently limited to the standard four-step travel demand model used in air quality conformity determinations and developer traffic studies. Newer applications, like land use modeling and smart growth performance measures, have been explored as part of the Blueprint planning process; however, they remain undeveloped in the MCTC traffic model. As a result of the limited model resources available, MCTC-developed targets omit many of the greenhouse gas reductions that can be quantified with more precise modeling tools.

The eight San Joaquin Valley counties are currently developing a Model Improvement Plan that, when implemented, will provide Valley modelers with the tools they need to detect and quantify the reductions in greenhouse gas emissions as a result of smart growth planning. Ideally, we would like to see a process that allows for a new round of target development in 1-2 years, taking into account the new model sensitivities available for our use.

The grave economic situation in the state of California, and especially the San Joaquin Valley, is another principle concern for MCTC. Reductions in local sales tax revenue and the subsequent fiscal emergencies that have gripped local governments raise serious questions about the feasibility of implementing SB 375 in a depressed economy. A delay in SB 375 implementation would provide welcome relief for governments struggling to remain afloat and give local planners additional time to prepare for the drastic changes in development patterns that will accompany implementation.

Sincerely,

Jim Kopshever, Chair
Madera County Transportation Commission

SB 375 CO2 Target Setting - Total VMT

CO2 per capita per weekday (in pounds)

	2005	2020	2035
2007 RTP Baseline	24.5	24.8	25.3

CO2 difference from baseline (in pounds)

	2005	2020	2035
2007 RTP Baseline	--	**0.3**	**0.8**

CO2 difference from baseline (percentage)

	2005	2020	2035
2007 RTP Baseline	--	**1.2%**	**3.3%**

SB 375 CO2 Target Setting -
50% I-X/X-I and 100% X-X Trips Removed

CO2 per capita per weekday (in pounds)

	2005	2020	2035
2007 RTP Baseline	19.7	20.3	21.8

CO2 difference from baseline (in pounds)

	2005	2020	2035
2007 RTP Baseline	--	**0.6**	**2.1**

CO2 difference from baseline (percentage)

	2005	2020	2035
2007 RTP Baseline	--	**3.0%**	**10.7%**