



Transportation Committee

August 4, 2010

Proposed Greenhouse Gas Emission Targets

Issue: What greenhouse gas emission targets for the next Metropolitan Transportation Plan (MTP) should the Transportation Committee recommend that the Board send to the California Air Resources Board (CARB)?

Recommendation: That the Transportation Committee recommend that the Board approve targets of **-7%** per capita for 2020 and **-16%** per capita for 2035.

Discussion: August is the last Board meeting to exercise our option to recommend targets to the CARB before they execute their SB375 statutory requirement to set greenhouse gas emission reduction targets for passenger vehicles by September 30 for all 18 regions in the state. Staff has completed first drafts consistent with the three scenarios for the MTP that were authorized by the Board at its June meeting. The estimated performance of these scenarios is summarized in Attachment 1.

The staff recommendation for -7% for 2020 and -16% for 2035 is in the mid-range of the performance of the three scenarios. The mid-range approach is consistent with the draft targets the Board released for public comment in May (see Attachment 2) and the “Draft Principles for Setting Greenhouse Gas Emission Reduction Targets” adopted by the Board in April (see Attachment 3). The savings numbers have increased slightly (1%) from the draft targets as a result of our much more detailed technical work this summer, but the policy position is the same: targets that would call for modest improvement in the performance of our current MTP, but well within reach of what can be attained through the next MTP. Remember, the Board can always decide to exceed the targets for its own reasons. And, if for some reason, you conclude through the MTP that the targets can not feasibly be met in the MTP, the statute gives you the option to prepare an Alternative Planning Scenario to meet the targets.

This staff recommendation puts us within a close range of the recommendations being made by the other large regions in the state. MTC’s Board (Bay Area) last week recommended -7% and -15% for their 2020 and 2035 targets. SANDAG’s Board (San Diego) the prior week recommended -7% and -13%. SCAG (Los Angeles) is expected to recommend -7% for 2020; at this time it is not clear what their 2035 recommendation will be. SACOG’s growth rate is about twice as high as any of these other regions. Given our region’s aggressive implementation of the Blueprint and the strong performance of our existing MTP, it is accurate to say that we have a far smaller improvement to make to meet these recommended targets than the other three large regions in the state.

Also attached (4 and 5) are the only two letters on the targets issue we have received to date, from the city of Davis and Walk Sacramento. Both recommended substantially higher targets than the draft targets.

Approved by:

Mike McKeever
Executive Director

MM:gg
Attachments

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Attachment 1
Preliminary Results of 2011 MTP Alternative Scenarios

MTP Scenario /1/	Policy Bundles				Percent Reduction from 2005 Per Capita					
	Land Use	Transp. Sys. Delv.	System / Demand Mgmt.	Pricing	Horizon Year:	GHG	VMT	Transit	Bike+ Walk	Congestion
Scenario 1	Land use, transportation, and TSM/TDM per MTP alternatives framework presented at July Board meeting			n/a	2020 /2/ 2035	-6% -15%	-13%	+43%	+21%	-4%
Scenario 2	Land use, transportation, and TSM/TDM per MTP alternatives framework presented at July Board meeting			n/a	2020 /2/ 2035	-7% -16%	-14%	+60%	+21%	+1%
Scenario 3	Land use, transportation, and TSM/TDM per MTP alternatives framework presented at July Board meeting			n/a	2020 /2/ 2035	-8% -17%	-15%	+82%	+22%	+5%

Source: SACOG, August 2010.

Notes:

/1/ Preliminary results for 2035 horizon year model runs are provided. The results should be considered preliminary, and are provided at this juncture to provide some level of reassurance that the proposed GHG reduction targets are reasonable based on the likely results our ongoing MTP efforts.

/2/ No 2020 horizon years for the MTP scenarios have been developed—reported are estimates of GHG reductions for these scenarios based on prior runs and professional judgment.



Item #10-5-5 Action

Transportation Committee

May 5, 2010

Draft Proposed Greenhouse Gas Emissions Reduction Targets for Public Comment

Issue: What greenhouse gas emissions targets for the next Metropolitan Transportation Plan (MTP) should the Transportation Committee release for public comment?

Recommendation: That the Transportation Committee release for public comment per capita greenhouse gas emissions reductions between 5 percent and 6 percent for 2020 and between 14 percent and 15 percent for 2035 (compared to a 2005 base year).

Discussion: In April, the Board adopted "Draft Principles for Setting Greenhouse Gas Emissions Targets" (below) and delegated authority to the Transportation Committee at its May meeting to release draft targets for public comment at its May meeting. We have briefed all Board committees multiple times over the last few months on the scenario planning work we have been doing, in conjunction with the Los Angeles, Bay Area, and San Diego regional agencies to better determine how to define the California Air Resources Boards admonition to the Regional Targets Advisory Committee that the targets be set at the "most ambitious achievable" level.

Attachment 1 summarizes the scenarios that staff has defined. Attachment 2 summarizes the performance of those scenarios in five key performance areas, including greenhouse gas emissions. Attachment 3 provides more detailed information on the main elements of each scenario.

The scenarios explore the possibilities of additional greenhouse gas reductions from our currently adopted MTP in four areas: (1) more Blueprint consistent land uses, (2) more transit funding, (3) more transportation and system demand programs, and (4) more use of pricing of transportation facilities. We also created combined scenarios of the first three areas, and then all four.

All of the scenarios are coarser-grained than the scenarios we will build over the summer to present in fall workshops. This just means that they were built for a specific research purpose and under a tight deadline and will undergo a lot of additional work before we get to the point of building a draft scenario for the next MTP.

Staff recommends that the Transportation Committee release for public comment the following greenhouse gas emissions target ranges:

2020: Reductions in per capita greenhouse gas emissions between 5 percent and 6 percent from the base year (2005)

2035: Reductions in per capita greenhouse emissions between 14 percent and 15 percent from the base year (2005)

The full range of savings shown in the attached information is between 4 percent and 8 percent for 2020 and 13 percent and 18 percent for 2035. The low end of the range reflects the current MTP. The high end of the range reflects complete implementation of every idea we tested in the scenarios. Staff believes that the low end of the range, while obviously meeting the "achievable" part of the CARB direction, does not meet the "most ambitious" part. Conversely, the high end of the range is plenty ambitious, but staff does not believe meets the "achievable" language. The ranges recommended for 2020 and 2035 would balance both the achievable and ambitious targets, and would provide the Board with a good deal of flexibility in determining how to meet the targets.

CARB senior staff has signaled to the regions that it prefers to use a range, rather than a single number, for the draft regional targets for 2020 and 2035 that SB375 requires them to release by June 30, 2010. All of the other regional agencies support the notion of using a range at this point and allowing more detailed work over the summer and early fall to inform CARB's final decision on targets by September 30, 2010. This approach fits nicely with the MTP calendar adopted by the Board last month, including more detailed scenario building over the summer, including substantial input

from member and partner staff as well as the public. The Board will approve the basic framework for those scenarios in June.

It is important to stress that staff's advice to the Board regarding the targets may be refined in the coming months for any number of reasons, most obviously: a) additional internal work that the luxury of more time will afford, b) input during the public comment period from our members, partners and stakeholders, and c) ongoing active collaboration with the major regional agencies throughout the state. The Regional Targets Advisory Committee recommendation is that CARB provide a uniform target for all regional agencies.

It is also important to note that even after CARB provides SACOG a final target by September 30 that it will not literally be either a floor or a ceiling for what the Board decides to achieve in the MTP. SB375 provides flexibility for the Board to develop an "Alternative Planning Scenario" if it determines it is not feasible to meet the target. On the other hand, the Board could also decide that the statewide target is more modest than it wants to achieve. You certainly have the flexibility to adopt an MTP which exceeds the CARB target.

The information below briefly describes how staff believes the recommended target ranges are consistent with the target setting principles the Board adopted last month.

Principle #1. Commitment to information-based, multi-objective decision-making. While we have not by any means calculated the full range of metrics that will be addressed in our MTP, the attached does illustrate how these scenario perform on some of the most critical metrics we have used (i.e., congestion, vehicle miles traveled, transit and walk/bike trips in addition to greenhouse gas emissions). Fortunately, the actions that reduce greenhouse gas emissions are also creating substantial improvements in these other areas, with congestion per capita in particular for the first time showing a decline rather than just a slower increase.

Principle #2. Use up-to-date forecasts and assumption. We have used the draft growth projections approved by the Board for public comment and an updated (and somewhat higher) gas price forecast for all of these model runs. The gas price forecast has been agreed to by all of the major regions in the state.

Principle #3. Be consistent with Blueprint growth principles. The current MTP is largely, though not entirely, consistent with the Blueprint. The lower end of the ranges we are recommending for 2020 and 2035 are based on the current MTP. The middle to higher end of the ranges reflects a land use pattern more literally consistent with the Blueprint.

Principle #4. Be based on reasonable assumptions about funding availability. This issue will need further work over the summer. We are still updating our financial forecast as well as now working directly with federal agencies on how they will apply federal financial constraint requirements in light of SB375.

Principle #5. Target better performance in 2035 than 2020. The recommended ranges are more ambitious for 2035 than 2020.

Principle #6. Possibly adopt a tiered MTP this cycle, including a "base plan" and a "tiered plan." The Board does not need to decide this until much later, but this scenario work begins the process of building the right foundation for that decision by purposely exploring land use and transportation options that go beyond our currently adopted MTP.

Approved by:

Mike McKeever
Executive Director

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Attachments

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**Attachment 1
Scenario Description**

	Year	Land Use Characteristics	Transportation Characteristics
Base year 2005		33% of residential use in compact range, overall density is 5.7 per acre. 80% of residents are in Transit Priority Areas.	4% of freeways are HOV lanes, 19% of transit service is high frequency. TSM/TDM deployment is moderate. No car sharing or pricing programs.
1: Adopted 2008 MTP	2020	Compact residential is 54% of growth. Overall residential density +9%. 40% of residential growth is in Transit Priority Areas.	The HOV lane share of freeways more than doubles, frequent transit service is +50%. TSM/TDM increases with population growth. No car sharing or pricing.
	2035	Compact residential is 60% of growth. 30% of residential growth is in Transit Priority Areas.	Continued modest increase in HOV lanes, frequent transit service is +100%. TSM/TDM increases with population growth. No car sharing or pricing.
2: MTP + Land use enhancements	2020	Compact residential is 68% of growth. 44% of residential growth is in Transit Priority Areas.	No change from 2008 MTP.
	2035	Compact residential is 68% of growth. Overall residential density +28%. 46% of residential growth is in Transit Priority Areas.	No change from 2008 MTP.
3: MTP + Transit enhancements	2020	No density change from 2008 MTP.	Frequent transit service increases 65%.
	2035	No density change from 2008 MTP.	Frequent transit service increases 195%.
4: MTP + Transportation System and Demand Management enhancements	2020	No change from 2008 MTP.	TSM/TDM grows faster than population growth. Car sharing in 4 communities.
	2035	No change from 2008 MTP.	TSM/TDM grows faster than population growth. Car sharing in 4 communities.
5: MTP + Transportation Pricing	2020	No change from 2008 MTP.	\$0.01/VMT, \$0.10/congested VMT, +25% in employment center parking, 10% transit fare reduction.
	2035	No change from 2008 MTP.	\$0.03/VMT, \$0.25/congested VMT, +50% in employment center parking, 25% transit fare reduction.
6: MTP + Land use, Transit, and TSM/TDM	2020	See scenario #2.	See scenarios #3 and #4.
	2035	See scenario #2.	See scenarios #3 and #4.
7: MTP + All enhancements	2020	See scenario #2.	See scenarios #3, #4, and #5.
	2035	See scenario #2.	See scenarios #3, #4, and #5.

Attachment 2
Summary of SACOG SB375 GHG Reduction Planning Scenarios

Scenario	Policy Bundles				Percent Reduction from 2005 Per Capita					
	Land Use	Transp. Sys. Devel.	System / Demand Mgmt.	Pricing	Horizon Year:	GHG	VMT	Transit	Bike+ Walk	Congestion
1: Adopted MTP (2008)	Largely Consistent w/Blueprint	Per MTP	Per MTP	n/a	2020	-4.0%	-2%	+31%	+6%	-11%
					2035	-12.6%	-10%	+77%	+14%	-19%
2: Land Use Enhancements	Consistent with Blueprint	Per MTP	Per MTP	n/a	2020	-5.9%	-4%	+53%	+10%	-18%
					2035	-13.8%	-11%	+91%	+20%	-21%
3: Transit Enhancements	Per MTP	+15% more transit	Per MTP	n/a	2020	-4.1%	-2%	+37%	+6%	-11%
					2035	-12.7%	-10%	+89%	+14%	-19%
4: TSM/TDM Enhancements	Per MTP	Per MTP	Expanded TSM/TDM	n/a	2020	-4.5%	-3%	+31%	+7%	-11%
					2035	-13.1%	-10%	+77%	+14%	-19%
5: Pricing	Per MTP	Per MTP	Per MTP	Tolls, VMT charges	2020	-4.7%	-3%	+35%	+7%	-11%
					2035	-15.1%	-12%	+90%	+15%	-20%
6: Combine Land Use, Transit, TSM/TDM	Consistent with Blueprint	+15% more transit	Expanded TSM/TDM	n/a	2020	-6.5%	-5%	+60%	+10%	-21%
					2035	-14.4%	-12%	+103%	+20%	-21%
7: Combine Land Use, Transit, TSM/TDM and Pricing	Consistent with Blueprint	+15% more transit	Expanded TSM/TDM	Tolls, VMT charges	2020	-7.9%	-6%	+64%	+11%	-22%
					2035	-17.4%	-14%	+119%	+22%	-23%

Source: SACOG, May 2010.

Attachment 3 Description of SACOG SB375 Planning Scenarios

SACOG evaluated seven policy scenarios, in concert with other large MPOs around the state involved in GHG target setting for SB375.

The most basic scenario is the adopted MTP (“A Creative New Vision for Transportation in the Sacramento Region” that was adopted in 2008). The adopted MTP was the first long-range transportation plan which the region developed after the Blueprint process was complete. Six other scenarios are being evaluated, each of which expands and enhances implementation of various policies over-and-above the adopted MTP. The policies are organized into one of four “bundles,” as follows:

- Land use measures
- Transportation system development
- Transportation system and demand management
- Transportation pricing

Scenario 1 is the currently adopted MTP. In terms of land use measures, the adopted MTP is largely, but not completely, consistent with the Blueprint vision adopted in 2004. In terms of transportation projects, the amount of high-frequency transit service is nearly doubled on a per-capita basis. System and demand management is expanded marginally from current deployment levels, after accounting for population growth. No transportation pricing policies are included in the adopted MTP.

Each of the policy bundles, with the exception of pricing, is represented to some degree in the adopted MTP. The planning scenarios for this analysis are conceptually defined as enhanced implementation of these policy bundles, compared to the levels included in the current MTP. Scenarios 2 through 5 each focus on expanding/enhancing one policy bundle, in addition to currently planned investments.

- *Scenario 2 (Land Use)* is fully consistent with the Blueprint's distribution of new rural residential at one percent of new housing stock. The growth share for single family large lot units is about 30 percent (compared to 37 percent for the MTP), and the combined small-lot-single-family and attached unit share is 68 percent (compared to 60 percent for the MTP). Residential units in Transit Priority Areas accounted for 46 percent of the growth (compared to 30 percent for the MTP).
- *Scenario 3 (Transit)* expands investment in transit compared to the MTP. As mentioned above, the adopted MTP would nearly double high-frequency transit by 2035, compared to 2005 levels. In this scenario, transit service is increased by 15 percent, with service expansion focused on the most productive transit corridors.
- *Scenario 4 (TSM/TDM)* would expand and enhance the planned investment in transportation systems and demand management in the adopted plan. The adopted MTP includes some expansion of the current employer based programs (primarily marketing, education, and coordination), and growth of the region's ITS and incident management to

account for population growth. Scenario 4 would expand the investment in employer-based programs to include more direct incentives for non-single-occupant vehicle commuting (e.g., transit passes, non-motorized subsidies, etc.), and provide more resources for ITS and incident management. Additionally, this scenario would provide some level of public subsidy to establish car-sharing programs in at least 2 communities or employment centers where market demand alone is unlikely to support a private car-sharing venture.

- **Scenario 5 (Pricing)** would add significant new transportation pricing policies which are not included to any degree in the adopted MTP. Four policies are included: congestion pricing for the regions major freeways, with tolls ranging from \$0.10 to \$0.25 per mile; a general VMT-based charge of \$0.01 to \$0.03 per mile; policy-based increases to off-street parking charges at employment centers; and additional subsidies to transit fares, to reduce out-of-pocket costs for using transit.

Scenarios 6 and 7 look at combining the policy bundles:

- **Scenario 6** would combine land use measure, transportation projects, and system and demand management; no pricing policies are included.
- **Scenario 7** would combine all four policy bundles.

Each scenario is based on enhanced, coordinated implementation of the policy bundle in question, without explicit reference to cost or actual implementation potential, so the analysis results presented here focus on the benefits only and portray the maximum benefits reasonably expected from implementation of the policies. SACOG has coordinated with other large MPOs to ensure some level of consistency and reasonableness in the deployment levels attached to each policy bundle and scenario, and to estimate reasonable benefits as a result of the implementation of the policy bundles.

As the GHG target setting process continues, these scenarios will be further analyzed and used in the development of the MTP scenarios. Through the consultation with local agencies in the SACOG region as the MTP and SB375 implementation process progresses, the costs, cost-effectiveness, and implementation potential of the various policies will be detailed and documented by SACOG and local agency staff, and considered by policy makers involved in the MTP process.



Item #10-4-10D Action

SACOG Board of Directors

April 7, 2010

Authorize Release of Draft Principles for Setting Greenhouse Gas Emissions Reduction Targets

Issue: What are the principles for developing recommended greenhouse gas emissions reduction targets for SACOG to recommend to the California Air Resources Board (CARB)?

Recommendation: The Transportation Committee recommends that the Board release the six principles below and delegate authority to the Transportation Committee to release draft targets for greenhouse gas emissions reduction for public comment at its May meeting.

Committee Action/Discussion: SB 375 provides the 18 regions in the state the ability to recommend their own greenhouse gas emission targets. This must occur before June 30, when the California Air Resources Board must release draft greenhouse gas emissions reductions targets for the regions. CARB must set final targets by September 30, 2010.

Staff recommends that SACOG use the following six principles in establishing its recommended targets.

1. SACOG is committed to information-based, performance driven decision-making. It will use performance metrics to guide the 2011 MTP in a variety of areas (i.e., not just greenhouse gas emissions), including reducing per capita congestion; vehicle miles traveled, environmental impacts, and increasing modes of travel other than single occupancy automobile use; safety; goods movement; and accessibility of SACOG's diverse population to transportation services. The SB 375 greenhouse gas emissions reduction target will be one of several performance metrics addressing key policy goals (the attached list of principles for the current MTP will provide a starting place for developing the comprehensive list of metrics).
2. All performance goals should be established based on up-to-date forecasts and assumptions about future population, employment, and demographic trends. All future performance goals should take account of current performance, based on the most reliable regional data sources. The last five years have shown that key factors like the economy and fuel prices can change rapidly and unpredictably; the performance metrics should be established after evaluating sensitivity analyses on these uncertain factors, and key assumptions should be clearly documented to allow for monitoring and updating for changing conditions in the future.
3. The performance goals should be consistent with the Blueprint growth principles and should maximize the opportunities for new CEQA reform benefits included in SB 375 to help the region implement the Blueprint growth principles.
4. The performance goals should be based on reasonable assumptions that federal, state, local and private funding will identify and implement funding sources sufficient to build and operate a functional, effective, transportation system for all modes of travel (i.e., it should not assume that current downturns in transportation funding sources continue for the next 25 years). However, the impacts of failure to secure adequate funding levels should also be considered and clearly identified.

5. The performance goals should be realistic in targeting greater success and better performance in later years (e.g., 2035) than in early years (e.g., 2020).
6. Given funding challenges and federal requirements related to financial and land use constraints, it may be necessary for SACOG to adopt a tiered MTP in 2011, with a "base plan" and a "preferred plan." The base plan would be the officially-acknowledged plan for federal air quality conformity and other purposes and may fall short on some of the performance goals, including the SB 375 targets. The preferred plan would reflect the region's aspirations of the type of transportation system it wants to construct and operate and the land use pattern it wishes to build. The preferred plan would be expected to have superior performance and may also be an alternative planning scenario under the terms of SB 375.

Staff is updating the scenario modeling to inform this target-setting process that it has shared with the Board over the last few months to reflect updated growth assumptions. While the new forecast has not yet been formally adopted by the Board, it is the best we have to work with given the calendar limits of SB 375. We are also coordinating our work with the major MPOs in the state and the staff of the Air Resources Board to try to ensure some standardization and comparability of results, where appropriate (e.g., fuel price assumptions, financial constraints, etc.).

This process will be complete in time for the April committee or Board meetings. Therefore, we recommend that the Board delegate to the Transportation Committee the authority to review these updated scenario modeling results and release a draft greenhouse gas emissions target for purposes of public comment. Those comments would then be considered at the June Transportation Committee meeting and the committee will be asked to forward a recommended target to the Board for action at its June meeting.

Approved by:

Mike McKeever
Executive Director

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Attachment

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BOARD-ADOPTED GUIDING PRINCIPLES FOR THE MTP2035

Principle 1—Smart Land Use

Design a transportation system to support good growth patterns, including increased housing and transportation options, focusing more growth inward and improving the economic viability of rural areas.

Principle 2—Environmental Quality and Sustainability

Minimize direct and indirect transportation impacts on the environment for cleaner air and natural resource protection.

Principle 3—Financial Stewardship

A transportation system that delivers cost-effective results that are feasible to construct and maintain.

Principle 4—Economic Vitality

Efficiently connect people to jobs and get goods to market.

Principle 5—Access & Mobility

Improve opportunities for businesses and citizens to easily access goods, jobs, services and housing.

Principle 6—Equity & Choice

Provide real, viable travel choices for all people throughout our diverse region.

JUN - 3 2010

Attachment 4



909 12th Street Ste 116 Sacramento CA 95814 (916) 444-6600 www.sacbike.org

May 31, 2010

Mike McKeever, Executive Director
Transportation Committee
Sacramento Area Council of Governments
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Advisory Board

Jane Hagedorn
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*Breathe California of
Sacramento-Emigrant
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Craig Stradley
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Jim Streng
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Streng Brothers Rentals

RE: AB 32 Draft Targets

Dear Mr. McKeever and Transportation Committee members,

Thank you for the holding workshops on the AB 32 draft targets and seeking comments. Reducing greenhouse gas (GHG) emissions is an incredibly important local, state and national goal. The consequences of doing too little to fight GHGs are enormous for all Californians.

We recommend that state and federal goals be presented as background information to put the SACOG proposed GHG reduction options in context. We note that the SACOG reduction numbers are presented in terms of per capita reductions and that, given anticipated population growth, there may be no real total GHG reductions from transportation—a segment that produces 40 percent of all GHGs in the state—from the proposed options. Local Metropolitan Planning Organization goals should track with state and federal goals methodology and size. For that to happen, the SACOG options need to be more robust than the modest goals suggested.

State goals call for a reduction of GHGs to 1990 levels by 2020. That's about a 28 percent reduction from business as usual and a far greater reduction than 7 or 8 percent *per capita* reductions achieved by the SACOG policy options. Federal agency GHG reduction goals, based on Executive Order, call for a 28 percent reduction by 2020. The Kerry/Lieberman draft legislation calls for a 17 percent GHG reduction from 2005 levels by 2020. Disturbingly, the proposed SACOG analysis based on per capita figures obscures and tends to underestimate the challenges of total GHG reductions.

In addition to the above, there is no clear path provided in the policy options to achieve the much more ambitious state and federal goals of 80 percent reductions in GHGs by 2050. The local path to reaching 2050 GHG goals should be a part of current planning efforts. This would mirror the Blueprint plan's foresight in planning for the long term.

We believe information about cost effectiveness of the policy options is essential and look forward to SACOG's analysis of costs. We've always maintained that switching vehicle trips to bike trips is the most cost-effective transportation policy. Bicycle facilities are relatively inexpensive to build and extremely inexpensive to maintain

and operate. There are also tremendous ancillary benefits to public health, improved air quality and quality of life from having more trips made by bike. Results of policy decisions in Germany, Denmark and The Netherlands show that increasing the mode share for bicycling is practical and realistic even in places with far less favorable weather than our own.

We recommend consideration of a policy option that focuses on more bike and pedestrian trips. Perhaps this policy option could be combined with the land use and pricing options which appear from the initial analysis to be the most effective options for reducing GHGs and VMT. Implementing a pricing option, with certain, gradually escalating prices, though likely unpopular in the short term, has the added benefit of providing sustainable funding for bike, pedestrian and transit facility construction and operation.

SABA is an award-winning nonprofit organization with more than 1400 members. We represent bicyclists. Our aim is more and safer trips by bike. We are working for a future in which bicycling for everyday transportation is common because it is safe, convenient, and desirable. Bicycling is the healthiest, cleanest, cheapest, quietest, most energy efficient, and least congesting form of transportation.

Thank you for considering our comments.

Yours truly,



Walt Seifert
Executive Director

cc: California Air Resources Board



May 24, 2010

Leslie McBride, Board Chair
SACOG Board of Directors
1415 L Street, Suite 300
Sacramento, CA 95814

Subject: City of Davis Comments: SB 375 Regional Target Setting – SACOG

Dear Chairperson McBride:

The purpose of this letter is to share the City of Davis' comments on the recent release of the Draft Proposed Greenhouse Gas Emissions Reduction Targets by the SACOG Transportation Committee. The City supports and has a track record of implementing an integrated community planning system designed achieve desirable environmental goals while enhancing quality of life. More recently, the City has used GHG emissions as an additional assessment of how the community's decades long investment strategy in compact, mixed use urban design is performing. Specifically, the inventory of local GHG emissions allows for analysis of the interaction between local land use decisions and VMT. It is within this applied context that the City shares the following comments on the draft regional GHG targets for the transportation sector:

1. GHG targets. Based on the City's local GHG inventory (ICLEI and UC Davis subject matter experts), Davis will need to reduce local and commute VMT by 10% by 2015 to stay on a path to meet AB 32 targets. This VMT reduction takes into account low carbon fuel standards, Pavley, the Renewable Portfolio Standards, as well as GHG reductions in all other sectors of the community (e.g. Energy, Waste and Consumption, etc.).

Based on analysis of our GHG inventory and AB 32 goals, the City believes that the draft regional GHG targets are set too low to achieve statewide or local GHG targets. At the local level this is important since a large proportion of VMT associated with cities is intercity travel. In order to meet community level targets, we must rely on the successful execution of region level transportation system improvements that cut VMT significantly. Simply put, the City cannot meet its local targets with out more robust regional targets and the associated actions that the targets will trigger. Further, the draft GHG targets send a signal to local governments about the scope and scale of

VMT reductions that are needed to successfully mitigate GHG emission in the transportation sector. This will influence local climate action planning as local jurisdictions look to SACOG as an authority on transportation issues. While the City understands that SACOG may feel that these targets are the most ambitious feasible regional targets possible in today's political and economic environment, it must consider the implications of setting targets that fall short of needed reductions and the influence they will have on local climate action planning. At a minimum, the regional targets must also identify what needs to be achieved in VMT related GHG emission reductions to allow decision makers to weigh the critical question of what must be done against what SACOG believes can be done.

2. GHG target calculation methodology. The City questions the use of a per-capita calculation to determine success in reaching regional GHG targets. The basic purpose of all efforts around climate change is to reduce total atmospheric GHG levels. By using a per-capita measure, it is possible under multiple scenarios for reduction in GHG emissions per person to be off-set by adding more people. In many foreseeable scenarios in this region, we could end up with more total GHG emissions despite meeting the goals to reduce the per-capita amounts. In other words we would fail to achieve net reductions in overall GHG emissions.

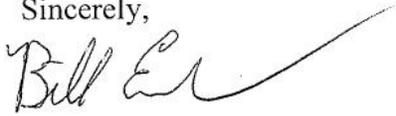
The following table illustrates one possible scenario where the regional per-capita goals are achieved but total GHG emissions rise. These general calculations are based on SACOG population data and findings by the City on the average transportation related GHG emissions for Davis residents (the results are more troubling if California per capita averages for transportation GHG emissions are used):

Year	Regional Population	Transportation Related GHG Emissions Ave. per capita	Total Transportation Related GHG Emissions	Percent Change	Notes
2008	2,309,968	3.25 MT	7,507,396 MT	Baseline	Assume 3.25MT Transportation related GHG emissions per-capita (source: ARB, City of Davis)
2020 (est)	2,660,127	3.055 MT	8,126,688 MT	~ 8% increase	Assume 6% reduction in per capita VMT GHG
2035 (est)	3,218,700	2.7625 MT	8,891,659 MT	~ 18% increase	Assume 15% reduction in per capita VMT GHG

3. Implementation. The City is concerned that a purely voluntary incentives based implementation strategy will not yield desired reductions. As many of the MTP transportation system improvements are regional in scope, there is limited incentive for individual cities to perform even to the recommended draft targets. The City believes that this will serve to undermine the purpose of SB 375. The City encourages the SACOG board to send a clear, consistent signal that smart community planning and design is necessary rather than an option and will be rewarded when accomplished.

The City appreciates the opportunity to comment on the draft regional targets and looks forward to continuing to work with SACOG and our other regional partners to craft a strategy that places the region on the path to achieving our share of the statewide target.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Emlen", with a long, sweeping flourish extending to the right.

Bill Emlen
City Manager