San Joaquin Valley Regional Planning Agencies' Directors' Committee

c/o Council of Fresno County Governments – 2035 Tulare St. #201 – Fresno, CA 93721
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August 3, 2010

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OFFICE OF THE CHAIRMAN
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Mary D. Nichols, Chairman
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Subject: San Joaquin Valley Greenhouse Gas Targets

Dear Ms. Nichols:

On behalf of the San Joaquin Valley Regional Planning Agencies' Directors, I would like to comment on the GHG target setting process currently underway. As you know, the eight Valley MPOs have all recently adopted their 2011 Regional Transportation Plans (which did not formally address the Sustainable Communities Strategy that will come into play once the final targets are identified). We have, however, been engaged in the target setting process and appreciate the assistance we have had from your staff. A major concern that we have here in the Valley is really an issue of timing. While we are committed to developing our next RTPs to respond to SB 375, we are concerned with the time frame within which to do so. I would like to share what we perceive to be some of our constraints:

- The San Joaquin Valley model improvement plan, as identified in our Prop 84 grant proposal, includes tasks that extend into 2014 and beyond.
- The ambitious effort involved in bringing the individual valley models to compliance with the adopted 2010 RTP Guidelines will require data development and the formulation of both conventional and sophisticated models.
- Key data (2010 Census and 2010 Statewide Household Travel Survey) needed to develop and implement the updated model will likely not be available in time to be applied to the 2012 model updates.
- Based on conversations we have had with the Attorney General's office, a number of us will be producing a Sustainable Communities Strategy prior to 2014 and are not really sure yet how this will affect the 4 year RTP cycle.

Given all of these "irons" that we have in the fire, we are requesting flexibility as we move forward in the SCS/RTP process. We recognize that the ARB has a statutory requirement to set targets in September 2010; however, we would like to request the Board to consider what it can do to revisit the Valley in 2012 in order to better reflect the improved state of our modeling and the additional scenarios that will be available at that time. This is critical as the Valley develops its next round of RTPs and improves its modeling capability. It will also allow time for the Valley to better determine how it will address the statutory option of developing a multi-region SCS. We sincerely believe that we can develop more definitive "ambitious and achievable" targets as we improve our modeling tools and enhance our capacity.

In closing I would like to acknowledge the work that is already underway in the Valley - work that will have an impact on greenhouse gas reduction, as well as improve the quality of life for all who reside here. Blueprint planning is moving toward implementation and sales tax measures enhance our ability to provide infrastructure improvements for more transit and alternative modes. We are poised to move to the next level and request that you provide the flexibility for us to do so in the most effective manner.

Thank you for your consideration.

Tony Boren

Tony Boren, Chairman
San Joaquin Valley COG Directors

Cc: Lynn Terry, California Air Resources Board
Doug Ito, California Air Resources Board