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**Daniel S. Little, Executive Director**

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September 10, 2014

Terry Roberts  
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Air Quality Planning & Science Division  
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**Subject: Comments on ARB Preliminary Draft Staff Report, SB 375 GHG Emissions Reduction Target Update Process**

Thank you for the opportunity to comment on the first update of the regional greenhouse gas emissions targets pursuant to SB 375. We appreciate the time taken to articulate the various policy issues, background, collateral benefits, early successes, and statutory and regulatory framework.

The following comments have been organized to correspond to the policy and technical considerations discussed in the ARB Preliminary Draft Staff Report.

**Policy Considerations:**

**1. Nature or Magnitude of Targets**

- Regarding the target metric and how it's applied, we recommend not reopening what is the result of extensive past work effort, technical process, and statewide interagency consultation. Any practical benefits that might be gained do not justify the time and resources required to revisit this topic, and we believe would represent a distraction and lost opportunity to focus on moving forward with implementation efforts.
- Regarding more aggressive regional targets across the board, SRTA is evaluating reductions beyond its initial targets as part of the region's first Sustainable Communities Strategy. Recommendations for updated targets will be based on technical modeling, cost-benefit analysis, and a candid self-assessment of what might be achieved through concerted regional effort. It is requested that SRTA's initial planning process be allowed to play out before revised targets are considered.

Beyond this, we hope to look at what Shasta County might achieve when yoked in partnership with the state, including ARB. We highlight two examples in this regard:

First, it would be possible to further escalate targets if dedicated and ongoing funds are made available for SCS implementation. Although Active Transportation Program and Cap-and-Trade and funds will be distributed, the absence of regional guarantees and consistent allocations make it difficult, if not impossible, to incorporate revenue assumptions and corresponding projects into long-term planning and travel demand modeling.

Second, it is vital that the state back-up the work of MPOs serving on the frontlines of SB 375 implementation. More specifically, we appeal for a more substantive role in project selection in upcoming funding programs. Doing so will reinforce the nexus between collaborative SCS planning and funding. We believe this to be the difference between good projects and game-changing projects that bring about the magnitude of change envisioned by AB 32 and SB 375.

2. Timing and Logistics of Target Updates

- Regarding the timing of updates to regional targets with RTP planning cycles, there are various workable approaches, so long as target revisions do not impact an active RTP process. Target updates should only apply to future planning cycles that have yet to begin.
- The focus of target updates should be on 2035. Adjusting 2020 targets implies an agility in regional and local transportation and land use planning and implementation that simply does not exist.

3. Impacts of Technology and Fuels

- Regions should receive credit for GHG emissions reductions as a result of zero-emission vehicle programs. The targeted expansion of electric vehicle charging stations represents one of the most practical, cost-efficient, and community-supported strategies available to many regions.

4. Engaging Regional and Local Governments

- Regarding the need for ARB to encourage MPOs to work with their local governments early in the process, this work is already occurring. In Shasta County, local agencies have taken part in the earliest analysis, outreach, and planning efforts. Local plans – including general and specific plans – are in turn being developed in consultation with the region. Rather than add additional mandates, ARB could help to identify and share best practices between regions.
- Regarding community engagement, regions have voluntarily gone above and beyond SB 375 requirements. Mandating further activities is not necessary and may take away from best practices unique to individual regions.

5. Providing Community Benefits

- A broad range of benefits – beyond GHG emission reductions – are needed to build community consensus toward implementation of the various projects, programs, and

policies required to achieve regional targets. It is recommended that such benefits continue to be emphasized in state programs and policies.

**Technical Considerations:**

1. Interregional Travel

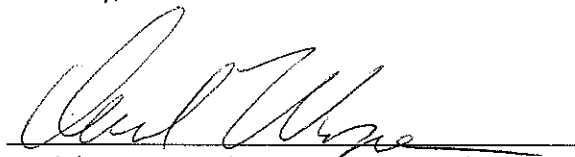
- Regarding interregional travel, SRTA commends efforts to establish a statewide tool (CA Statewide Model or other process) for estimating inter-regional travel between all regions of California. To ensure that the model is sensitive to the travel characteristics of all regions, we encourage ARB to continue to engage transportation modeling experts familiar with the challenges and diversity of rural and small-urban regions on the inter-regional travel working group. SRTA will continue to participate on technical advisory committees and offer input as needed.

2. Modeling tools and assumptions

- Smaller MPOs are hampered by data limitations, such as the small sample size of California Household Travel Surveys. In addition, many strategies being considered in smaller MPOs will require off-model calculations to estimate reductions in VMT and associated greenhouse gas emission. Efforts to identify uniform statewide assumptions for fuel prices, auto operating costs, economic conditions, and other assumptions would further cloud the accuracy of models in smaller MPOs. The update of targets in smaller MPOs will require more inter-agency discussion and a measure of flexibility between regions. We hope to work with ARB to identify the most accurate inputs and assumptions for Shasta County.

Overall, our experience working with ARB to date has been very positive and we look forward to working collaboratively in achieving California's goals and maximizing secondary benefits. Lastly, we ask that you please update page 7 of the staff report and future documents to reflect our new agency name – Shasta Regional Transportation Agency (SRTA).

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel Wayne", is written over a horizontal line.

Daniel Wayne, Senior Transportation Planner  
Shasta Regional Transportation Agency (MPO)

DTW/jac