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Mary Nichols, Chair
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814
cc: Lezlie Kimura Szeto

RE: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets

Dear Chair Nichols,

Thank you for the opportunity to comment on the Air Resources Board (ARB) staff recommendation for updating Senate Bill 375 (SB 375) Greenhouse Gas reduction targets. The ARB staff report, "Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets", is unacceptably vague in its target recommendations and does not give adequate consideration to targets recommended by regional agencies. This creates a strong potential for Alternative Planning Strategies (APS) in place of Sustainable Community Strategies (SCS). Instead of the staff recommendation, Merced County Association of Governments (MCAG) requests that you accept the targets we proposed in our December 2016 submittal to ARB titled "SB 375 Target Setting Recommendations for the San Joaquin Valley's Metropolitan Planning Organizations".

MCAG is highly motivated to implement SCS strategies, not only for greenhouse gas reduction but also due to numerous co-benefits, especially cleaner air. MCAG is sensitive to the need for air quality improvement, and is committed to the success of SB 375. We believe the recommendations presented in our December report meet the standard of being aggressive yet achievable.

ARB justification for not accepting our recommended targets discounts the information provided by us which reflects the actual local circumstances in the San Joaquin Valley region. ARB staff has proposed an arbitrary "step-up" approach to the target performance in the prior SCS based on the size and potential growth in each region regardless of modeling results. We request that ARB remove this step-up approach for the following reasons:

Geographic Differences – ARB has not given adequate consideration to the marked differences between major metro areas and the Valley, in housing density, economy, and limited travel choices. The Valley’s disadvantages in these areas and lack of financial resources mean higher targets are much less achievable for us.

Economic Opportunities in Disadvantaged Communities – ARB should consider the economic impact to the Valley’s disadvantaged communities when setting targets. Targets should be set to allow for the possibility of economic growth in disadvantaged communities where travel per household is likely to increase – *toward state averages* – as employment opportunities improve.

Cost of Driving Effect – ARB has ignored specific modeling provided the Valley MPOs showing the effect created by lower travel costs from more fuel efficient vehicles: in essence, more driving. Target setting should be based on local conditions which vary greatly throughout the state.

Unequal timing – the proposed target update is applying to the “3rd round” of SCS’s for the major metropolitan areas, but will apply to the “2nd round” for the San Joaquin Valley. The larger areas did not have increases in their targets from their 1st to 2nd rounds, so were allowed more time to implement and learn from their SCS efforts. The Valley is not being given the same consideration before increasing its targets.

RTP/SCS Amendment in 2016 – it has been only one year since MCAG amended its SCS in May 2016; this amendment achieves -12.7% in 2035 and is already aggressively “pushing the envelope” with compact growth and a variety of off-model strategies.

In summary, we believe that SB 375 targets should be set at the level outlined in our December report. Our recommendations meet the standard of being aggressive yet achievable, as they account for projects and initiatives that go above and beyond previous commitments and parallel the state’s reduction strategies.

Thank you for the continued dialogue with the Board and staff and for your consideration of our comments.

Sincerely,



Patrick Pittenger
Executive Director