

July 28, 2017

**SENT VIA E-MAIL**

Lezlie Kimura Szeto, Manager  
Sustainable Communities Policy & Planning Section  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

**Subject: SB 375 Greenhouse Gas Emission Reduction Target Update**

Dear Ms. Kimura Szeto:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) thanks the California Air Resources Board (CARB) for the opportunity to comment on the Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets. SMAQMD commends CARB's support of increasingly aggressive State greenhouse gas (GHG) emissions reductions goals in the target update process, which will also drive criteria emission reductions and provide other co-benefits. We also commend the discussion of developing and expanding funding, financing tools, and incentives for infill development and related infrastructure in the target update proposal, and anticipate further development on these actions.

We request clarification, however, on the following passage in the June 2017 CARB staff recommendation for SB 375 target updates: "The SB 375 targets are in units of percent per capita reduction in GHG emissions from automobiles and light trucks relative to 2005, this excludes reductions anticipated from implementation of State technology and fuels strategies, and any potential future State strategies such as statewide road user pricing" (page 16). The passage may be interpreted to mean that Metropolitan Planning Organizations (MPOs) could not count vehicle miles traveled (VMT) reductions resulting from State strategies towards their achievement of Metropolitan Transportation Plan / Sustainable Communities Strategy (MTP / SCS) GHG emissions reductions targets. This approach would raise further questions and concerns.

MPOs such as the Sacramento Area Council of Governments (SACOG) provided target recommendations that incorporated assumptions that these State strategies, such as mileage-based user fees, would be included in their target achievement. This topic was discussed at SACOG Board meetings on the target updates (see Appendix B of the target update proposal, page B-20), and MPOs such as SACOG have long advocated for such innovative strategies. The above passage would be the first indication from CARB that these State strategies would not be included in target achievement. It would require reassessment of SACOG's entire approach towards meeting targets at a point when their process is already underway.

Other questions raised – if MPOs could not count VMT reductions resulting from these State strategies as part of their target achievement – are as follows. How would reductions from these State strategies be separated from regional actions in determining MTP / SCS target achievement? Are there any anticipated reductions from these State strategies that are

quantified – and if so, are these reductions considered in formulating the MTP / SCS targets to best support AB 32? Answers to these questions would help affected agencies tremendously, in assessing target update practicalities.

In conclusion, SB 375 is innovative and critical legislation in supporting California's leadership in combatting climate change. CARB's skill and dedication has been essential to the legislation's success. We look forward to any clarification you can provide on the above cited passage regarding State strategies, and news of further development on the actions to facilitate infill development. We thank you for your attention to our comments and questions. If you have questions about them, please contact Molly Wright at [mwright@airquality.org](mailto:mwright@airquality.org).

Sincerely,

A handwritten signature in black ink that reads "Paul Philley". The signature is written in a cursive, slightly stylized font.

Paul Philley, AICP  
Program Supervisor  
Sacramento Metropolitan Air Quality Management District

Cc: Alberto Ayala, Ph.D., M.S.E., Air Pollution Control Officer, SMAQMD  
Molly Wright, Air Quality Planner / Analyst, SMAQMD