July 28, 2017

Clerk of the Board, Air Resources Board
1001 “I” Street
Sacramento, CA. 95814

Re: **Comments on the June, 2017 Draft Environmental Analysis and Staff Report for the Proposed Update to the SB 375 Greenhouse Gas Reduction Targets**

Dear Clerk of the Board:

On behalf of the undersigned business associations, who collectively represent the vast majority of businesses and employers in Kern County, we appreciate the opportunity to provide comments to the California Air Resources Board on the proposed SB 375 Greenhouse Gas(GHG) Emission Reduction Targets specified for the Kern Council of Governments(Kern COG) Region(Kern County).

In working with our Kern COG, we struggled to recommend the submitted 9% and 13% goals per capita GHG Reductions Targets for 2020 and 2035, respectively. While achieving ambitious climate change goals are well-intended, the 9% and 15% per capita GHG Reduction Targets for 2020 and 2035 prescribed in the CARB Staff Report are excessive and unreasonable and will have negative impacts on local area businesses and industries. It is especially disconcerting that CARB’s stepped reduction approach for establishing the Kern Region’s 2035 Target of 15% per capita reduction is arbitrary and fails to consider the unique geography and economic pursuits of Kern County.

Outside of the Bakersfield Metropolitan Area, the Kern Region's unique economic job centers are the basis for dispersed rural centers and strategic locations for land use activities that employ Kern County's residents. Kern's large size and geographically diverse valley, mountain and desert sub-regions are dominated by agriculture, oil production, renewable energy, aerospace, military and logistics centers utilizing the Region's transportation network where "ex-urban travel patterns" occur from the Region's urban centers as workers must travel out to the rural job centers. This situation is different than the typical urban commute patterns of other regions in the Valley and State and is the reason why it is important for CARB to acknowledge Kern COGs modeling and Target Recommendations.

The Kern Region's ability to attain CARB's more aggressive 2035 GHG Emission Target Reductions is limited by the loss of redevelopment finance mechanisms, declining Community Development Block Grant funding and the State's intention to delay building a Bakersfield High Speed Rail Station by 10 years which is a dis-incentive to finance and help fund infill infrastructure and housing in Kern's urban areas.

CARB Staff expects business interests and local governments in the Kern Region to achieve additional GHG Emission Reductions beyond their adopted Sustainable Communities Strategy and beyond Kern COG's 2017 recommended Target Reductions (9% per capita reduction for 2020 and 13% for 2035) through the implementation of enhanced land use and transportation strategies that, according to the CARB Staff Report, are to be implemented through funding opportunities created by the passage of Senate Bill 1, the utilization of Greenhouse Gas Reduction Fund, the utilization of the Clean Air Act Civil Settlement with Volkswagen, local tax measures implemented by local governments and "commitments" by State agencies to achieve further Vehicle Miles Traveled(VMT) reductions through State Agency efforts.

There is no assurance that these programs will have funding available for all regions to provide for the infrastructure funds needed by local governments and development interests to pursue infill development and enhanced transportation programs that will result in further GHG Emission Reductions. For example, California's new transportation funding law, Senate Bill 1, directs over 60% of the funding generated for the repair and maintenance of aging roads. Other funds to be generated by this funding program will go to public transit, State Highways and other earmarked programs. Remaining funds will be subject to a competitive selection process and there is no assurance that funds will be available for staffing and implementing additional innovative approaches to address GHG reduction.

Finally, it is unrealistic in the present economic climate for CARB to state that local governments can implement tax measures to promote GHG Emission Reduction Measures. Most revenue options available to local government agencies to fund transportation and other infrastructure designed to reduce GHG Emissions face a two-thirds voter approval requirement which is very challenging in the present economic climate.

As CARB is well aware, in order to be effective, the setting of GHG Emission Reduction Targets must be ambitious yet economically feasible to achieve success from the local region. By recommending unrealistically high Targets given the uncertainties of funding and resources for business interests and local governments in an uncertain economy, local regions will have no choice but to resort to developing Alternative Planning Strategies(APS) as provided by SB 375. Forcing the regions in this direction will result in minimal or no meaningful reductions in GHG emissions.

In closing our organizations request that the CARB Staff reconsider their 2035 Target for the Kern Region and use the Kern COG recommended Target of 13%. The success and effectiveness of implementing the SB 375 Program is dependent on setting economically feasible and achievable Emission Reduction Targets. This is the key to ensuring that business interests and local governments will continue to actively participate in the implementation of successful Sustainable Communities Strategy Programs.

Sincerely,

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cc: Kern Council of Governments