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California Air Resources Board (ARB)  
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**Subject: Comments on SB 375 Greenhouse Gas Emissions Reduction Target Update  
Process Staff Report – October 2014**

The Butte County Association of Governments (BCAG) appreciates the opportunity to comment regarding ARB's proposed actions to update the regional greenhouse gas emissions targets pursuant to SB 375.

At this time, BCAG has several concerns regarding the updating of targets of the six small MPO's, including BCAG, for the second Sustainable Communities Strategy (SCS) cycle.

- **Timing of BCAG's Target Update** – As proposed by ARB, an update of BCAG's targets for the second round of SCS's would occur in 2015. BCAG has already initiated the development of its 2016 Metropolitan Transportation Plan (MTP) and SCS which is tentatively scheduled to be considered for adoption in December of 2016. Given the limited availability of resources and staff for this update of the SCS, a change in targets at this time would negatively impact development of the 2016 MTP/SCS currently underway. BCAG encourages any revisions of targets be applied only to the third cycle of SCS and in a fashion which does not conflict with an active MTP/SCS process.
- **Flexible to Changing Factors** – Carrying forward reductions achieved by a past SCS assumes that all modeling factors will remain the same and does not consider changes in forecasted growth, interregional travel, cost of travel, etc. BCAG supports an approach to updating targets which includes flexibility to factors such as these.
- **Uncertainty of Implementation Funds** - There is much uncertainty concerning a source of implementation funds of current and future SCS's for MPOs. In addition, distribution of competitive Cap-and-Trade funds for California's smaller MPO regions do not look promising considering the current draft guidelines. BCAG cannot support an increase of targets considering the current and foreseeable absence of implementation funds.

Thank you in advance for considering BCAG's comments. Should you or your staff have any questions, please contact me by phone at (530) 879-2468 or by email at [blasagna@bcag.org](mailto:blasagna@bcag.org) .

Sincerely,



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Cc: Bill Higgins, Executive Director, CALCOG