



Tahoe  
Metropolitan  
Planning  
Organization

14-8-11  
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October 20, 2014

Mary D. Nichols  
Chairman  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: October 2014 Staff Report - Air Resources Board Senate Bill 375 Greenhouse Gas Emissions Reduction Target Update Process

Dear Ms. Nichols,

The purpose of this letter is to provide input on the October 24<sup>th</sup> Air Resources Board agenda item 14-8-11, "Briefing on Process for Updating Senate Bill 375 Greenhouse Gas Emission Reduction Targets." Thank you for the opportunity to comment and as always, we look forward to future discussion with California Air Resources Board (ARB) staff.

The Tahoe Metropolitan Planning Organization (TMPO) staff has reviewed the staff recommendation and has concerns over the greenhouse gas reduction targets for small MPOs for their second-round Sustainable Communities Strategies (SCSs). The TMPO adopted a Regional Transportation Plan and Sustainable Communities Strategy (RTP-SCS) in December 2012 that exceeded newly established per-capita greenhouse gas emissions targets for the Lake Tahoe Region for 2020 and 2035. The current ARB staff proposal, which appears to set new targets for small MPOs based on the greenhouse gas emissions projections in their first SCSs, could create additional technical and political unknowns that could jeopardize approval of the next round of SCSs.

Based on several factors, we support modifying the language in the ARB staff proposal to language that was proposed by Santa Barbara Council of Governments (SBCAG) in Peter Imhoff's e-mail to ARB staff dated October 20, 2014. Our reasoning takes into account the following considerations:

MPO SCS Self-Assessment Workshop. On September 19, 2013, TMPO staff attended a Strategic Growth Council Workshop to discuss with other MPOs their experience with the RTP-SCS process and to offer recommendations. A significant take-away from the workshop was that MPOs requested to keep the targets that they had diligently worked on through the Regional Targets Advisory Committee (RTAC) process and focus on implementing their SCS elements. This concern was shared by small and large MPOs.

TMPO is nearly two years into its RTP-SCS update. We are far enough along in our RTP-SCS update that the process of budgeting the required resources for developing strategies to meet our targets is completed. If technical updates to models or assumptions result in our current strategies not being sufficient to meet the greenhouse gas projections from the previous SCS, we do not have the resources to engage in the detailed analysis and public consensus-gathering process needed to establish a new set of targets.

Technical updates to modeling tools and modeling assumptions could make prior projections out-of-date. As SBCAG staff has described, MPOs are constantly working to update modeling tools and assumptions. Statewide models, such as EMFAC, also undergo frequent updates. It is possible that upgrades to any of these models, or new assumptions, could change greenhouse gas emissions reductions projections, despite an MPO maintaining the same greenhouse gas reduction strategies identified in the first SCS. If this is the case, TMPO could encounter difficulties meeting the projections of our 2012 RTP-SCS.

The language SBCAG has proposed is as follows:

"Targets for the six smaller MPOs would be updated based onto be consistent with GHG emissions strategies adopted or reductions projected achieved in their first SCSs, following consultation between ARB staff and MPOs regarding any changes in modeling tools, methodology or assumptions, and would apply to their second SCSs (beginning in 2016)."

Due to the time investment involved in any kind of new target-setting, if achievement of the projections from our 2012 SCS is determined to be infeasible due to technical changes in modeling tools or assumptions, we would prefer to be allowed to use our 2011 targets as "back-stop" targets, rather than engage in an extensive process of setting a new target in the middle of developing our 2016 SCS. As we have pointed out above, we do not have the resources to do this, and it would take valuable time away from work on implementation. We understand that ARB staff recognizes the need for flexibility on this.

While we are definitely on board with the need to continue to raise the bar with respect to driving towards greenhouse gas emissions reductions, for the next round of SCSs, we feel that real reductions are best achieved by allowing the MPOs to focus on implementation. We appreciate your consideration of these concerns and ARB staff's openness to working with the small MPOs on this matter.

Thank you for the opportunity to present these comments. If you have any questions, please contact me at [nhaven@trpa.org](mailto:nhaven@trpa.org), 775-589-5204.

Sincerely,



Nick Haven  
Transportation Planning Manager

Cc:  
Terry Roberts, ARB  
Bill Higgins, CALCOG  
Peter Imhoff, SBCAG