

July 27, 2009

Mike McKeever, Chair
Regional Targets Advisory Committee
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Dear Mr. McKeever:

SB 375 requires that the Air Resources Board (ARB) establish emission reduction targets for CO₂ emissions from passenger cars and light-duty trucks operating within the 18 Metropolitan Planning Organizations (MPOs) within the State of California. In order to inform this process SB 375 required that ARB appoint the Regional Targets Advisory Committee (RTAC) to provide recommendations on what factors and methodologies to consider in recommending targets.

The following are both general and specific comments and recommendations from the 8 San Joaquin Valley Metropolitan Planning Organizations and the San Joaquin Valley Air Pollution Control District to assist the RTAC as you develop recommendations to ARB.

General Comments

As the RTAC develops the factors and methodologies to consider in recommending targets, the committee should keep in mind that there are significant differences amongst the MPOs that will have to comply with SB375. These differences impact each region's ability to model, collect data, and ultimately determine which strategies are available and to what degree they can impact travel behavior.

Modeling alternative land-use scenarios is an evolving and resource intensive undertaking. Many of the small and medium sized MPOs in the state lack the necessary resources and modeling capabilities to effectively model different land-use scenarios and their resulting greenhouse gas emissions. An alternative path needs to be available to allow these MPOs to demonstrate compliance with SB375, particularly in the early years, while they develop the necessary modeling capabilities. It should be a top priority of the state, and all of the stakeholders involved with SB 375, to advocate at the state and federal level for resources to further develop these modeling tools. Additionally, the statewide travel survey and statewide model need to be fully funded to provide necessary data and inputs to the regional travel models.

It is also important to ensure that, to the extent feasible, consistent assumptions and variables be utilized throughout the state to create an even playing field amongst the MPOs. While there are many assumptions and variables in transportation models that are region specific, ARB in conjunction with the California Transportation Commission, MPOs, and local air districts should develop standardized modeling assumptions for variables that are uniform throughout the state. This process will lend credibility to the modeled outcomes as regions demonstrate compliance with SB 375.

In keeping with the spirit of SB 375, the targets should be clearly designed to preserve local land-use authority, and should not mandate any specific measures.

Specific Recommendations

In designing targets, ARB should keep the following in mind:

- Targets should be “ambitious and achievable” meaning that the targets should not be met through business as usual, but that the necessary policy changes required to meet the targets are feasible to implement given each regions unique situations.
- Targets should be relative, or a percent reduction, rather than absolute.
- They should either be per capita or per household
- Targets should be MPO specific and take into account factors such as size, population growth rates, jobs/housing balance, interregional trips, existing transportation infrastructure, and rural employment areas that are not conducive to urban infill relocation including jobs in strategic resource activities such as bio/solar/wind energy areas, agriculture, lumber, oil, mining, logistics, military, prisons, rural recreation, etc.
- MPOs should receive credit for progressive policies that have already been adopted to reduce GHG emissions
- The targets should provide incentives for MPOs to adopt effective policies in the near term, even if they currently do not have tools that are sensitive enough to determine the impacts of those policies.
- A disproportionate share of interregional trips between two regions should be allocated to the region that does not provide adequate affordable housing.
- Interregional trips that do not have an origin or destination in a region should not be allocated to that region since they are merely passing through, and the pass-through region has limited ability to impact that travel behavior.
- MPOs should be able to utilize one transportation model to comply with both SB 375 and air quality conformity requirements.
- If ARB utilizes the Scoping Plan emission reduction estimates to generate targets, they should ensure that the methodologies utilized to generate the

estimated reductions are consistent with the methodologies utilized to establish targets for SB375.

Regional Targets “2 Path” Approach

Given the significant variability in MPOs throughout the state, ARB should establish a two path target with both a performance based approach that would be met through modeling and a policy based, or best management practices approach. The two paths should result in equivalent GHG emissions and MPOs should be able to choose which path they prefer. The paths are as follows:

Path 1-Performance Standard

Path 1 is the traditional model based approach through which ARB establishes a target and each MPO demonstrates that they have met the target through modeling. In establishing targets for each MPO, ARB should consider factors that will impact the regions ability to achieve the target including growth rates, existing policies that are in place that achieve reductions in vehicle travel, jobs/housing balance, the impacts of interregional travel on the region, rural employment areas, etc.

The models that MPOs utilize to demonstrate compliance with the targets should be valid, meet minimum criteria, and be based upon uniform key assumptions that impact travel behavior. Variations from key assumption should be documented to ARB's satisfaction.

Regions should be allowed to substitute surplus reductions from policies for non transportation measures that reduce greenhouse gasses, such as energy efficiency standards beyond statewide requirements.

Path 2-Best Management Practices (point system)

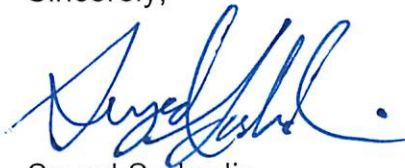
Path 2 is a policy based approach through which ARB in consultation with MPOs, local governments, and air districts will develop a list of best management practices to impact vehicle travel and greenhouse gas emissions. ARB should consult with a panel of experts to determine the efficacy of each of the policies included and establish a point system and number of points necessary for each MPO to achieve their target. Strategies should be specifically designed and categorized based upon the effectiveness of reducing GHG emissions for large, medium, and small sized MPOs in order to ensure that the recommended policies are achievable based upon local conditions. Examples of strategies include but are not limited to increased density, mixed use development, transit oriented development, increased jobs housing balance, transportation pricing, increased transit services, indirect source programs, and transportation demand management measures.

In developing their Sustainable Communities Strategy (SCS), MPOs will select sufficient strategies to meet the point total established by ARB and will include the strategies in relevant enforceable documents such as the regional transportation plan, general plans, and zoning ordinances. If the MPO cannot meet the point total they will develop an Alternative Planning Strategy (APS) with sufficient points to meet the target. MPOs may substitute measures that through documentation, acceptable to ARB, will achieve equivalent GHG emissions reductions.

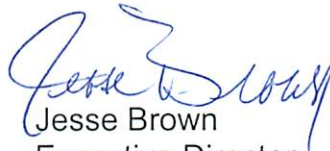
MPOs may utilize Path 2 for a period of eight years to allow sufficient time to develop the necessary modeling tools to accurately analyze GHG emissions from their SCS. At that time, they will comply with the Path 1 performance standard.

If you have any questions or comments concerning our recommendations please feel free to contact Seyed Sadredin at (559)230-6036 or Jesse Brown at (209)723-3153.

Sincerely,



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San Joaquin Valley APCD



Jesse Brown
Executive Director
Merced County Association of Gov.
President, San Joaquin Valley Regional
Planning Agencies, Directors Committee