



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT
SINCE 1955

August 3, 2010

James Goldstene
Executive Officer
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Dear Mr. Goldstene,

On behalf of the Bay Area Air Quality Management District (BAAQMD) staff I would like to commend the California Air Resources Board (ARB) for its work in developing statewide targets for reducing greenhouse gas emissions associated with land use planning decisions. The draft regional targets released on June 30th represent an important step toward containing and, ultimately, reducing greenhouse gas emissions in California.

The BAAQMD is working closely with its regional agency partners, the Association of Bay Area Governments (ABAG), the Metropolitan Transportation Commission (MTC) and the Bay Conservation and Development Commission (BCDC), as the region begins development of the Sustainable Communities Strategy (SCS) required under SB 375. The SCS should help move the Bay Area closer to achieving many of the goals that all the regional agencies are working toward. These goals include reducing motor vehicle emissions, increasing infill and transit-oriented development, reducing congestion on our roadways, protecting the San Francisco Bay, protecting the health of all our residents, and reducing our region's contribution to global climate change. Development of the SCS continues the strong Bay Area tradition of regional collaboration in promoting smart growth and sustainable land use practices through efforts such as the Bay Area Regional FOCUS project and the Transportation for Livable Communities program.

The BAAQMD has a keen interest in developing a strong and successful SCS. The recently released study, "Climate Change Impact on Air Quality in California," sponsored by ARB, states that:

"...studies for ozone consistently indicate that climate change will produce conditions more conducive to ozone production in California. ... Additional emissions controls are currently needed to offset the climate "penalty". The magnitude of the additional emissions controls needed in the future depends on our progress towards achieving air quality standards."

Due to the link between increasing ambient air temperatures, increased occurrence of extreme heat days, and poor air quality, it is in the best interest of

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public health and the state's economy to set and achieve the most aggressive greenhouse gas reduction targets possible. The significant co-benefits to air quality and public health are extremely important. More livable, sustainable communities in the future can help in improving air quality, reducing respiratory and cardiovascular illnesses, cancer, and infant mortality rates associated with air pollution from the transportation sector. In addition, the "climate penalty" referred to in the ARB-sponsored report may require placing additional air pollution controls on various sectors of the economy, including on our job-producing stationary sources, in order for the region to attain and maintain state and national health-based ambient air quality standards.

The BAAQMD views global climate change as a threat to public health and therefore has adopted protecting the climate as part of the agency's mission. Recently, the BAAQMD Board adopted the most stringent GHG significance thresholds in the state for projects subject to the California Environmental Quality Act (CEQA). These new CEQA thresholds are consistent with SB 375 and AB 32 goals and challenge the region to build more sustainable communities that will help us reach the ultimate climate protection goal of the Governor's Executive Order S-3-05, which is tied more closely to global climate stabilization. SB 375 targets are an important step in meeting the goals of the Governor's Executive Order.

The draft targets for the Bay Area released by ARB call for per capita GHG reductions below 2005 levels of 5-10% by 2020 and 3-12% by 2035. Given anticipated population growth over the next 10-25 years, these targets would likely result in an overall increase in GHG emissions from light duty vehicles when compared to 2005 levels of emissions from this sector.

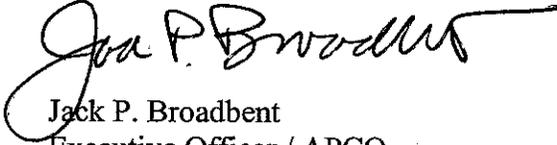
BAAQMD staff urges ARB to consider more ambitious GHG reduction targets than those currently proposed for the Bay Area. Analysis by MTC staff demonstrates that innovative and aggressive land use and pricing strategies are needed to make significant reductions in VMT. A strong emission reduction target for the SCS would facilitate the regional discussions among local governments, businesses, advocacy groups and the public that are needed to build widespread support for such strategies. BAAQMD endorses the *Bay Area Principles for Establishing Regional Greenhouse Gas Reduction Targets*, adopted by the MTC on July 28, 2010, which call for ARB to set per capita GHG reduction targets for the Bay Area of 7% by 2020 and 15% by 2035.

Ambitious targets for the Bay Area, such as those called for by the MTC, will stimulate critical discussions on the linkages between transportation, land use, air quality, climate change and health impacts that can result from different policy approaches. Ambitious targets throughout the state would challenge all the regions of California to continue and elevate a process that engages the public and

local governments in discussions of the merits of high density, transit oriented development and sustainability.

I look forward to working with you and the ARB team as we move forward with SB 375 and the rest of the Scoping Plan implementation.

Sincerely,



Jack P. Broadbent
Executive Officer / APCO

cc: Mary Nichols, ARB
Douglas Ito, ARB
Mat Ehrhardt, CAPCOA
Steve Heminger, MTC
Henry Gardner, ABAG
Will Travis, BCDC

