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DATE: September 16, 2010

TO: SJVUAPCD Governing Board

FROM: Seyed Sadredin, Executive Director/APCO
Project Coordinator: Tom Jordan

RE: DISCUSS THE DISTRICT'S POSITION CONCERNING THE REGIONAL GREENHOUSE GAS EMISSION REDUCTION TARGETS FOR AUTOMOBILES AND LIGHT TRUCKS PROPOSED BY THE CALIFORNIA AIR RESOURCES BOARD (CARB) UNDER SB 375

RECOMMENDATIONS:

Adopt the following policy positions concerning the upcoming action by CARB to established greenhouse gas emission reduction targets:

- 1) Given the major inadequacies in the current regional transportation models and the lack of necessary input data for those models, regional targets at this time should only serve as placeholders.
- 2) Given the shortcomings in the current models, when establishing the value for the placeholder targets, CARB should defer to the expert opinions of the local urban planners in estimating future emissions reductions. Metropolitan Planning Organizations (MPOs) to ensure ambitious but achievable targets.
- 3) The placeholder target values should also account for the fact that the Valley communities provide affordable housing for neighboring major metropolitan areas neighboring MPOs job/housing imbalance.
- 4) Based upon best available data and current modeling work, reductions of 2% for 2020 and 5% for 2035 represent ambitious and achievable placeholder targets for the Valley. With a firm commitment from the Valley MPOs to enhance the models and re-evaluate these targets beginning in 2012, CARB should accept these as placeholder targets.

- 5) CARB and the San Joaquin Valley Air Pollution Control District to provide funding and technical assistance to enhance modeling capabilities.
- 6) Support a regional target for the Valley, but provide for local control by allowing the Valley MPOs to coordinate and assign targets for the local jurisdictions within each MPO and the MPO as a whole taking into account local and regional factors.

BACKGROUND:

The goal of SB 375 (California's Sustainable Communities and Climate Protection Act of 2008) is to reduce vehicle miles travelled and reduce the associate emissions from passenger vehicles. In advancing these goals, SB 375 requires the California Air Resources Board (CARB) to establish regional greenhouse gas emission reduction targets and requires each of the State's 18 federally designated MPOs to explicitly consider the impact of land use patterns and transportation choices on greenhouse gas emissions.

SB 375 does not however, impose a direct mandate for meeting those targets nor does it impose any financial incentive or disincentive. Rather it provides for limited relief from the California Environmental Quality Act (CEQA) for projects that are consistent with a regional plan to meet SB 375 targets. Each MPO must develop a Sustainable Communities Strategy (SCS). The Sustainable Communities Strategy is part of the regional transportation plan that must take into account the region's fiscal and other socio-economic constraints. In doing so, the MPO must demonstrate that the infrastructure projects which support the Sustainable Communities Strategy are fully funded. If the region cannot meet the target through a Sustainable Communities Strategy, then they are required to develop an Alternative Planning Strategy (APS). In contrast with a Sustainable Communities Strategy an Alternative Planning Strategy would not need to consider fiscal or socio-economic constraints.

DISCUSSION:

As outlined in the District's 2010 Legislative Platform, it is the District's position to support climate change measures aimed at mobile sources that provide co-benefits by reducing ozone and particulate precursor emissions as well as greenhouse gases. Reasonable targets under SB 375 that are ambitious but achievable by Valley communities can provide for a win-win strategy that advances Valley's clean air mandates without disproportional focus on regulating Valley's stationary source businesses.

The Valley's businesses are already subject to some of the toughest air regulations in the nation. Since 1980, stationary source emissions have been reduced by over 80%. With 80% of the Valley's key pollutant emissions now coming from mobile sources, we

are fast approaching the point of diminishing returns with further regulations on stationary sources. Despite major reductions in emissions and significant improvements in air quality, meeting the current national ambient air quality standards will require significant reductions in current emissions. Additionally, the Federal Environmental Protection Agency is about to release much tougher standards for ozone and particulates. Meeting these new standards will require an additional 80 to 90% reduction in emissions. It will be impossible for the Valley to meet these new standards without a significant reduction in vehicular emissions.

Although meaningful reductions in mobile source emissions are vital, it is imperative that the SB 375 targets be carefully designed to ensure their achievability by Valley communities. Ensuring achievability of the targets requires transportation modeling tools that can quantify potential reductions in emissions that can be achieved through the application of a variety of effective land-use and transportation control measures. This also requires the availability of useable raw data to complete the necessary modeling. It is broadly accepted that the Valley municipalities do not currently possess the necessary tools. Given this shortcoming, which is not unique to the Valley, it is only sensible to treat any targets at this time only as placeholders. In establishing the placeholder targets, CARB must acknowledge the shortcomings in the models and as provided in SB 375 return in four years with more definite targets with improved models in place. Additionally, there is substantial travel between the Valley as an area with affordable housing, and the state's larger employment centers. In establishing placeholder targets, CARB should provide a lower placeholder target while the region develops a better understanding of the impacts of this inter-regional travel.

To assist with the work to enhance the models, the District's 2010-11 Budget includes a \$250,000 appropriation, and staffing commitment for technical assistance to the Valley MPOs. Additionally, the State of California has awarded \$2.5 million in Proposition 84 funds to enhance the Valley's models, and CARB is providing funding to develop an updated region-wide travel model based on an updated statewide travel model currently under development. The new model will include updated information about interregional travel and residential and employment growth patterns, which are both areas where the Valley's base input data is lacking.

Eight of the 18 MPOs subject to SB 375 requirements are located in the Valley (this includes the eastern portion of Kern County that is outside of the District boundaries). In contrast, Bay Area and Southern California counties with much larger total populations are served by single MPOs. In recent years, the Valley MPOs have shown the willingness and the ability to work together and share information, resources, and expertise through the Valley's Regional Policy Council. The eight MPOs also coordinated a highly successful regional planning effort through the Blueprint process. Although the Valley as a whole faces unique circumstances shared by all eight counties, the region also faces great diversity with respect to the transportation, infrastructure, and socioeconomic conditions from North to South and from East to West.

An optimum strategy for effective implementation of the SB 375 mandates should compel regional coordination and transportation planning while allowing for local control. Towards that end, CARB should establish a common target for the eight Valley MPOs, but allow the MPOs through the Regional Policy Council to assign feasible targets to each MPO and varying target goals for municipalities within each MPO. These local targets will take into account local circumstances and will enable the region as a whole to meet SB 375 targets while some localities may experience a lower rate of reductions or even an increase. For instance, under this scenario, smaller cities that provide affordable housing for larger cities' employment centers may experience less reductions in emissions and the shortfall can be made denser development in larger cities.

The Kern County Board of Supervisors, has taken the position that it can not meet the targets that have been proposed for the San Joaquin Valley, and that they would like to be separated from the other Valley MPOs and have targets proposed specifically for Kern County. CARB currently does not have the authority to set targets for individual jurisdictions below the MPO level. However, today's recommendation would likely meet the concerns of Kern County by providing lower placeholder targets based upon local expertise, and by giving local officials the ability to sub-divide the targets to meet the needs of jurisdictions within the Valley.