



METROPOLITAN
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COMMISSION

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Memorandum

TO: MTC Planning Committee, ABAG Administration
Committee and Joint Policy Committee

DATE: September 3, 2010

FR: Executive Director

RE: California Air Resources Board’s (CARB) Staff Report for Proposed Greenhouse Gas (GHG) Emission Reduction Targets

Background

As you know, the Commission adopted its “Bay Area Principles for Establishing Regional Greenhouse Gas Reduction Targets” (see Attachment A) pursuant to MTC Resolution No. 3970 on July 28, 2010. The principles are intended to help inform CARB in its GHG target-setting deliberations between now and September 23, 2010, when it adopts final statewide targets.

There are two key principles we advise CARB to consider when setting targets for the State and this region:

- Principle #6 - CARB should adopt single statewide targets for 2020 and 2035
- Principle #7 - CARB should not establish a GHG target for the Bay Area that exceeds a 7% per capita reduction for 2020 or a 15% per capita reduction for 2035.

Subsequent to the Commission’s adoption of the principles, CARB staff released its *Staff Report for Proposed Greenhouse Gas Emission Reduction Targets* (see Attachment B). In summary, CARB staff is recommending that its board adopt GHG targets that largely mirror those requested by each of the 18 MPOs required to comply with SB 375. For the four largest MPOs, which represent over 80% of the State’s population, CARB staff has recommended the following:

Per Capital GHG Emission Reductions from Passenger Vehicles Relative to 2005 Levels

MPO	2020 Target	2035 Target
Bay Area	7%	15%
Sacramento	7%	16%
San Diego	7%	13%
Los Angeles	8%*	13%*

* Subject to SCAG board approval

You’ll note three things from the table: 1) CARB’s targets for the Bay Area are consistent with the Commission’s adopted Principle #7; 2) all the large MPO targets are very similar; and 3) despite the similarity, CARB staff is recommending different targets for each region. CARB staff is also recommending different targets for the Central Valley MPOs, which conflicts with the Commission’s Principle #6 and the advice of the Regional Targets Advisory Committee (RTAC) to adopt uniform statewide targets for 2020 and 2035. In regard to Principle #6, it is clearly more equitable to the MPOs to adopt a single statewide target for each horizon year; however if this is not achievable, the Commission suggested that different targets for

different regions should be based on meaningful demographic differences. This does not appear to be the path that CARB staff followed.

Since the CARB staff report was released, the board of directors of the Southern California Association of Governments (SCAG) on a deeply divided vote has requested lower targets for the Los Angeles region than those recommended by CARB staff. It also appears that some Central Valley officials may petition CARB to lower their proposed targets of 5% in 2020 and 10% in 2035 – even though their goals already are lower than those recommended for their neighbors in adjoining metropolitan areas.

Despite the drama in other parts of the state, it is important not to lose sight of the fact that CARB staff have proposed the numerical GHG targets for the Bay Area that the Commission requested. Accordingly, MTC staff does not believe that any further action by the Commission is required at this time. I will be present at the CARB hearing on September 23rd to convey the Commission's adopted policy at that forum.

Steve Heminger

Attachment A

BAY AREA PRINCIPLES FOR ESTABLISHING REGIONAL GREENHOUSE GAS REDUCTION TARGETS – JULY 2010

1. The Bay Area's adopted long-range transportation plan (Transportation 2035) is extremely climate friendly by devoting over 80% of all available resources to operation and maintenance of the existing transportation network which will support the region's in-fill development strategy; 14% of remaining resources to a public transit expansion program subject to a transit-oriented development policy; and only 3% to road expansion featuring congestion pricing for single occupant auto access to almost all new highway capacity that will be constructed.
2. The Transportation 2035 Plan is expected to achieve a 3% per capita greenhouse gas (GHG) emission reduction by 2020 and a 2% per capita GHG reduction by 2035. The lower per capita reduction in 2035 likely is due to the forecast growth in vehicle travel and its impact in worsening congested highway speeds and their associated GHG emissions.
3. The strategies that the Bay Area is pursuing to reduce GHG emissions have significant co-benefits in improving mobility and access to vital destinations, reducing emissions of criteria pollutants, and creating more livable communities throughout the nine-county region.
4. The Metropolitan Transportation Commission (MTC) is nearing completion of an upgrade of its travel demand models from a trip-based to activity-based orientation. While this is expected to improve the accuracy of our models in predicting future travel behavior by all modes, it is unlikely to produce dramatic changes in the scenario planning results that MTC already has submitted to CARB.
5. Repeated MTC analyses dating back to our 1994 Regional Transportation Plan have consistently shown that the two most powerful strategies for altering travel behavior are changes in land development patterns and the price of auto travel. Implementing these strategies at a systematic scale will require significant local consensus-building and, in many cases, authorization by the State Legislature and United States Congress.
6. The Regional Targets Advisory Committee recommended that the California Air Resources Board (CARB) adopt a single statewide target for per capita GHG emission reductions in the state's metropolitan areas. If this is not achievable, CARB should only adopt different targets for different metropolitan areas based on sound planning practice and meaningful demographic differences, not CARB arbitrary geographical classifications.
7. Based on the scenario planning conducted by MTC and federal requirements that regional transportation plans be grounded in realistic forecasts for available revenue and future growth, CARB should not establish a GHG target for the Bay Area that exceeds a 7% per capita reduction for 2020 or a 15% per capita reduction for 2035.

8. CARB should work with other executive agencies and the State Legislature to identify financial, regulatory, and other incentives that could be provided to help regions achieve and, if possible, exceed their per capita GHG reduction targets.
9. As required by Senate Bill 375, CARB should regularly review the GHG targets established in 2010 and consider revisions based on changing economic and demographic conditions as well as the actual results achieved in the implementation of the Sustainable Communities Strategies.

Attachment B

CARB Staff report