



Air Resources Board



Matthew Rodriguez
Secretary for
Environmental Protection

Mary D. Nichols, Chairman
1001 I Street • P.O. Box 2815
Sacramento, California 95812 • www.arb.ca.gov

Edmund G. Brown Jr.
Governor

November 17, 2011

Mr. Jon Clark
Executive Director
Butte County Association of Governments
2580 Sierra Sunrise Terrace, Suite 100
Chico, California 95928-8441

Dear Mr. Clark:

Thank you for your letter of August 30, 2011 to Chairman Mary D. Nichols submitting the Butte County Association of Government's (BCAG) proposed technical methodology document to the Air Resources Board (ARB) as required by Senate Bill 375 (SB 375). Your submittal fulfills the requirement under California Government Code section 65080(b)(2)(J)(i) that each metropolitan planning organization (MPO) submit to ARB a description of the technical methodology it will use to estimate greenhouse gas (GHG) emissions from its Sustainable Communities Strategy (SCS).

Under California Government Code section 65080(b)(2)(J)(ii), an MPO must submit its adopted SCS to ARB staff for review, including a quantification of the GHG emissions from its SCS and a determination of whether the SCS meets the region's GHG emission reduction targets established by ARB. ARB is required to review and either accept or reject an MPO's determination that its adopted SCS, if implemented, would meet the GHG emission reduction targets. To facilitate ARB staff's future review of BCAG's adopted SCS, ARB staff will request supporting information regarding your technical methodology during the upcoming development of the draft SCS. The types of supporting information ARB staff will request are identified in ARB's July 2011 "Description of Methodology for ARB Staff Review of Greenhouse Gas Reductions from Sustainable Communities Strategies Pursuant to SB 375 (Methodology)." ARB staff's Methodology provides the framework for a transparent evaluation of the GHG emissions from an SCS, and focuses on four technical aspects of transportation modeling that are central to quantifying passenger vehicle-related GHG emissions: use of appropriate modeling tools (including off-model processes), use of appropriate data and assumptions, demonstration of model sensitivity, and demonstration of consistency with related performance indicators.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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As you develop your region's draft SCS, ARB staff will work with BCAG to customize our approach to the review of BCAG's SCS, taking into consideration the unique conditions and capabilities in your region. For BCAG, this process is just about to start, and ARB looks forward to working with you to craft a process that is appropriate to BCAG's unique circumstances.

We would also like to clarify that the regional GHG emission reduction targets for the BCAG region established by ARB for 2020 and 2035 are to achieve no greater than a one percent increase in per capita CO₂ emissions from passenger vehicles, from 2005 levels, in either year. This correction should be made to your proposed methodology before proceeding further with development of BCAG's draft SCS.

If you have any questions, please contact me at (916) 322-0285 or have your staff contact Ms. Jennifer Gray, Air Pollution Specialist, at (916) 327-0027, or by email at jgray@arb.ca.gov.

Sincerely,



Douglas Ito, Chief
Air Quality and Transportation Planning Branch

cc: Mary D. Nichols, Chairman
California Air Resources Board

Jennifer Gray
Air Pollution Specialist
Air Quality and Transportation Planning Branch