An unidentified air resources board member

As I <u>blogged</u>, the California Air Resources Board <u>yesterday</u> set greenhouse gas targets for the eighteen metropolitan regions in the state, which these regions must try to meet through a land use and transportation planning process.

The Board basically split the difference of what the staff recommended. For the four largest regions, staff wanted 5-10% per capita reductions. The Board went with seven percent. If you believe real estate developers, the world as we know it is about to end with these targets. Overall, these targets represent fairly aggressive goals for greenhouse gas emissions reductions. But because the law itself contains no teeth, they are unlikely to fundamentally change development patterns in the state.

Here is the breakdown on the targets:

- The San Diego Area: 7 percent and 13 percent
- Sacramento Region: 7 percent and 16 percent
- Bay Area Region: 7 percent and 15 percent
- Southern California: 8 percent and 13 percent, with the 2035 target conditioned on discussions with the MPO
- San Joaquin Valley (includes eight planning organizations): **placeholder** of 5 percent and 10 percent, **to be revisited in 2012** [emphasis mine]
- Targets for the remaining six Metropolitan Planning Organizations—the Monterey Bay, Butte, San Luis Obispo, Santa Barbara, Shasta and Tahoe Basin regions—generally match or improve upon their current plans for 2020 and 2035.

Notably, the San Joaquin Valley targets are just placeholders. For a fast-growing region of the state prone to horrific air quality and sprawl problems, these targets should have been set in stone. Arguably, the Air Resources Board has no legal justification for setting placeholders at all and should have developed firm targets. The <u>law states</u> that CARB "shall provide each affected region with greenhouse gas emission reduction targets" by September 30th, with no mention of provisional or placeholder targets. The law earlier references "draft" targets which are distinct from final targets, and "placeholders" sound a lot like "draft." Furthermore, the law specifies exactly when the targets can be revisited: CARB must update them every eight years and "may" update them every four years based on certain conditions. "Revisiting" them in 2012 sounds inconsistent with the statutory language. Worse, should <u>Proposition 23</u> pass and suspend the state's global warming law,

political momentum to strengthen these targets in 2012 may go the way of the polar ice cap.