

May 10, 2017

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 9581

Re: 2020 Greenhouse Emission Reduction Target for the Fresno County Region

Dear Chair Nichols,

I hope this letter finds you well. Although the California Air Resources Board (ARB) did not request a GHG reduction target for 2020, Fresno COG has determined that a 2020 target recommendation will inform ARB's target setting process. Based on the latest population numbers released by the Department of Finance (DOF) and the employment numbers by the Employment Development Department (EDD), the Fresno region is recovering faster from the recession in employment but is experiencing slower population growth than foreseen by the last growth forecast, which was applied in the 2014 RTP/SCS. The different recovery rates in employment and population have significant impacts on the new 2020 population/employment projection and thus the 2020 target which is based on the new projection. The higher recovery rate in employment and slower population growth contribute to a new 2020 projection with approximately 29,000 more jobs and 35,000 less population in the region. The following table provides a comparison of two sets of growth projection for the region. The 2012 projection, conducted by the Planning Center in 2012, was based off the 2010 population/employment numbers and applied in the 2014 SCS. The 2017 projection, which was just adopted by Fresno COG Policy Board in April 2017, was based on the 2015 population/employment numbers.

- City of Clovis
- City of Coalinga
- City of Firebaugh
- City of Fowler
- City of Fresno
- City of Huron
- City of Kerman
- City of Kingsburg
- City of Mendota
- City of Orange Cove
- City of Parlier
- City of Reedley
- City of San Joaquin
- City of Sanger
- City of Selma
- County of Fresno

	The Planning Center (2012)			ADE (2017)		
	Population	Employment	Unemployment rate	Population	Employment	Unemployment rate
2010	929,758	326,900	16.1%	932,642	334,059	16.1%
2015	1,010,080	348,282	16.8%	972,300	372,400	9.1%
2020	1,082,097	369,665	17.1%	1,047,440	398,050	9.1%
2035	1,300,597	433,812	17.9%	1,258,860	460,100	12.6%

*The highlighted cells indicate historical values at time of study; the rest of the cells are projected numbers.

The Fresno COG region has historically been plagued by double digit unemployment rates, and is one of the areas in the State with highest poverty concentration. The region also has the most disadvantaged communities in the State. The added jobs coming out of the recession are timely and celebrated opportunities to an impoverished region such as Fresno County where the majority of residents are minorities. It shows that the most disadvantaged communities are also benefiting from the economic recovery, which, to some extent, helps to address geographic social inequity issues in the State.

However, higher employment rates mean that more people are traveling to work, which leads to higher per capita VMT/GHG with a smaller projected population.

Due to the economic recovery effect described above, Fresno COG is recommending a 6% per capita GHG reduction for 2020. Land use and transportation strategies applied in the 2020 target scenario are consistent with the 2014 SCS, which was described in the submittal for the 2035 target to ARB on April 25, 2017. Alternative transportation strategies such as vanpool, carpool, bike and pedestrian projects, ITS, Electric Vehicle (EV) charging stations and the San Joaquin Valley Air Pollution Control District's Employer Based Trip Reduction Program (Rule 9410) are also built in the 2020 target, but scaled down to the 2020 level.

Although the 2014 SCS projected to achieve 9% per capita GHG reduction in 2020, it was based on a projection with a less optimistic employment future and faster population growth. 6% per capita reduction is, however, based on the latest employment/population projection with better economic opportunities for the region, and still exceeds the 5% target for 2020 that was set in 2010.

Thank you for considering the recommended 2020 target. Should you have any questions regarding the proposed draft target, please feel free to contact me or my staff Kristine Cai at 559-233-4148 or kcai@fresnocog.org.

Sincerely,

A handwritten signature in black ink that reads "Tony Boren". The signature is written in a cursive, flowing style.

Tony Boren

Executive Director