



Donald P. Wagner, Mayor

cityofirvine.org

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July 27, 2017

Chair Mary D. Nichols
California Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: Draft Senate Bill 375 Greenhouse Gas Reduction Target Recommendation

Dear Chair Nichols:

We would like to thank the California Air Resources Board (ARB) for the opportunity to review and comment on the draft Senate Bill 375 Greenhouse Gas Reduction Target Recommendation dated June 13, 2017.

City of Irvine staff is concerned with the proposed 21 percent per capita reduction target for 2035 that was recommended for the Southern California Association of Governments (SCAG). This target is more than double the ARB approved 2035 target for the SCAG region. We respectfully request ARB honor the SCAG Regional Council recommendation of 18 percent per capita reduction approved on April 6, 2017. This is a more viable target for Southern California.

The proposed ARB 21 percent recommendation would apply to the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which is conditioned upon a combination of actions or alternative equivalent measures. The 2016 RTP/SCS prepared by SCAG, in coordination with its member agencies, achieved an 18 percent per capita Greenhouse Gas reduction for 2035, significantly exceeding the ARB target of 13 percent set prior to the 2012 RTP/SCS. The 2016 RTP/SCS is already an ambitious plan. It exceeds all land use and transportation strategies while protecting economic growth, job creation, and accessibility. Venturing beyond the 18 percent per capita reduction sets an impractical expectation and warrants further consideration by your agency.

The 2020 RTP/SCS will be challenged to simply maintain the 18 percent level of per capita Greenhouse Gas (GHG) reduction as in the 2016 RTP/SCS. The 2016 RTP/SCS, represents an ambitious regional plan that pushes the envelope in all strategies while protecting economic growth, job creation, and accessibility. With the

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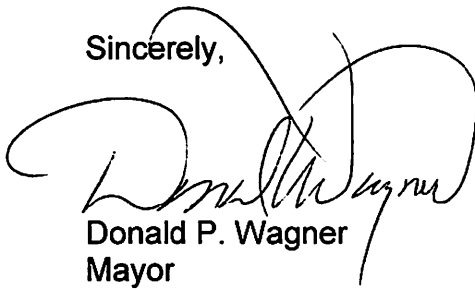
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anticipated impacts from the Vehicle Miles Traveled (VMT) rebound effect (i.e., better fuel efficiency leading to more driving and more VMT), the same level of resolve will not achieve the 18 percent per capita GHG reduction. The rebound effect will reduce five percentage points of per capita GHG reduction from that achieved in the 2016-2040 RTP/SCS. The Stress Test performed by SCAG shows that mobility innovation and other new strategies may fill about 2.5 percent of the gap. That will still leave a 2.5 percent gap to reach the 18 percent level. SCAG has indicated it will try its best to fill the 2.5 percentage point gap to reach the 18 percent level in the 2020 RTP/SCS. However, success is not guaranteed.

The SCAG region deserves the opportunity to measure the effectiveness of Sustainable Communities Strategies projects identified in the 2012 and 2016 RTP/SCS prior to ARB increasing the Greenhouse Gas Reduction Targets to a level that appears to be overly ambitious and unachievable. Please reconsider the proposed 21 percent per capita reduction target for 2035. We recommend the 18 percent target that is a more achievable and realistic goal for our region.

Thank you again for consideration of our request. If you have any additional questions, please contact Senior Planner Marika Poynter at 949-724-6456 or mpoynter@cityofirvine.org.

Sincerely,



Donald P. Wagner
Mayor

cc: Irvine City Council
Sean Joyce, City Manager
Susan Emery, Director of Community Development