



July 27, 2017

CONNECTING COMMUNITIES  
ARROYO GRANDE | ATASCADERO | GROVER BEACH  
MORRO BAY | PASO ROBLES | PISMO BEACH  
SAN LUIS OBISPO | SAN LUIS OBISPO COUNTY

Teresa Roberts  
Manager, Sustainable Communities Policy and Planning Section  
California Air Resources Board Air Quality Planning and Science Division  
9500 Telstar Avenue  
El Monte, CA 91731

**RE: GHG reductions target proposed for SLOCOG**

Dear Ms. Roberts,

While cautiously supportive of the proposed higher target, SLOCOG staff would be appreciative of any consideration to move from 11% back toward its original 8% target. The SLOCOG Board and its advisory committees also recommended maintaining the original 8% target.

For SLOCOG to retain its 8% target is better aligned with the targets of the "Other" six MPOs. Comparable COGs, including Shasta, Butte, Tahoe, and the Association of Monterey Bay Area Governments all have proposed targets below 8%. These smaller regions, like San Luis Obispo, also are slow growing (or approaching population natural decrease), lack any rail transit, have no direct access to high-speed rail, and most have a tourism focus. Santa Barbara is the only other COG in the "Other" six MPOs with a target above 8%, but they have a completed RTP draft, with commuter rail, that achieves their proposed target.

Regions with a second round SCS, completed or draft, RTP are better able to review and accept proposed targets than those that are in an early stage. Anticipating adoption in June 2019, SLOCOG is in the early stages to develop its second round SCS and RTP. Public engagement is just underway, the first stakeholder group meeting was held this month, the initial meeting to inform our land use model occurred yesterday with many more yet to come, but the initial projections for financial constraint are yet to begin. Federal and state funding sources, estimates, and assumptions (including a possible repeal of SB-1 by voters in November 2017) are a crucial component of the RTP and its capability to achieve targets.

SLOCOG's 2014 RTP had six years of growth and investments assumptions to model within its 2020 scenario; the 2019 RTP will have perhaps 12 months of change to consider. With very slow-growth and no opportunities to begin and complete new transportation improvements, 2020 modeling results will be measurements of 'what exists' rather than modeling of 'what could be.' SLOCOG has reallocated staff time to generate 2020 results from its modeling tools in August 2017 and submit these results to your staff by September 1, 2017. This effort is inharmonious with our RTP development process, but necessary to provide timely input in advance of the final targets set for 2020.

SLOCOG staff thanks you and your staff for your helpful, coordinated, and cooperative efforts to see the regions of the state succeed in these endeavors and for the opportunity to review and revisit our regional GHG reduction targets. We will continue to work with your staff to develop and refine existing modeling tools and to integrate ARB-recommended assumptions and off-model tools as needed to achieve our reduction target for 2035.

Sincerely,

Ronald L. De Carli  
Executive Director,  
San Luis Obispo Council of Governments