



City of Mission Viejo

Office of the Mayor and City Council

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July 26, 2017

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

Subject: Support the SCAG Recommendation of an 18% Per Capita Greenhouse Gas (GHG) Reduction Target for the SCAG Region By Year 2035: Air Resources Board's Draft Senate Bill 375 GHG Target Update Process

Dear Chair Nichols:

The City of Mission Viejo appreciates the opportunity to review and comment on the California Air Resources Board's "Proposed Update to the SB 375 Greenhouse Gas Reduction Targets" that was released on June 13, 2017.

The City of Mission Viejo conducted a careful review of the draft ARB document and ARB's recommended greenhouse gas (GHG) reduction targets for the SCAG region, which would be effective January 2018 and apply to SCAG's 2020 SCAG Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The City of Mission Viejo also reviewed SCAG's technical analysis that was submitted to ARB, which assesses the degree of Greenhouse Gas Emissions (GHG) reductions that SCAG believes the region could realistically achieve in Year 2035.

Based upon the above, the City of Mission Viejo respectfully cannot support the ARB's draft 2035 GHG reduction target for the SCAG region (21% per capita reduction from 1990 levels). The City of Mission Viejo instead requests ARB to carefully consider and support SCAG's recommended target of an 18% per capita reduction from 1990 levels, for Year 2035. The City of Mission Viejo joins together with our local partners at the Orange County Transportation Authority (OCTA) and the Orange County Council of Governments (OCCOG), in supporting SCAG's recommended 18% target for Year 2035.

While the City recognizes there are stakeholders which desire the 2035 targets to be very aggressive, the City of Mission Viejo finds there needs to be a delicate balance between being ambitious, yet realistic, in the setting of GHG emission reduction goals for the region.

The City of Mission Viejo is in full agreement with OCTA's recommendation that ARB pursue a more conservative approach with the update of the GHG targets for this particular cycle. There is still significant work that needs to be conducted by ARB and by the state's Metropolitan Planning Organizations, to collect data and quantify how much GHG reductions can actually be achieved by the various land use and transportation strategies proposed in the last two cycles of adopted



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RTP/SCS plans. Clearly, the state would greatly benefit from ARB's next step efforts to track SCS implementation efforts and outcomes, and to use this information with the next GHG target setting update cycle in four years.

In the absence of such critical information, we recommend that ARB consider and adopt the GHG targets as analyzed and recommended by SCAG for the 2018 cycle.

In the prior two RTP/SCS cycles (2012 and 2016), SCAG has been forthright in assessing and preparing SCS's capable of meeting and exceeding ARB's targets, when SCAG's analysis of all feasible GHG reduction strategies had been assessed.

In preparation for the 2018 GHG target setting process, SCAG conducted significant technical work to provide ARB with an analysis, justification and recommendation of the 18% target for Year 2035, based upon a bottoms-up and collaborative process with other MPOs. In SCAG's professional assessment, the 2020 RTP/SCS for the SCAG region will be challenged just to maintain the 18% target that was integrated in the 2016 RTP/SCS for Year 2035. The proposed 21% target, however, would set the SCAG region for failure in developing and adopting a compliant 2020 SCS.

The City of Mission Viejo urges the Governing Board to recognize SCAG's insights and recommendations for the 2018 target setting process, and to approve an 18% GHG emissions reduction target for Year 2035 for the SCAG region.

With appreciation,



Wendy Bucknum,
Mayor,
City of Mission Viejo

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