

From: Andrea Howard
To: Kimura.Lezlie@ARB
Subject: Comment Letter - Support for SCAG's SB 375 Target Recommendation
Date: Friday, July 28, 2017 5:51:17 PM
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[SB 375 Target Support Letter-WRCOG.PDF](#)

Good afternoon Lezlie,

Attached please find the Western Riverside Council of Governments' comment letter regarding the SB 375 Target Update. We appreciate the opportunity to submit comments. Thank you for your consideration.

Regards,

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July 28, 2017

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

**Subject: Support the SCAG Recommendation of 18% Per Capita GHG Reduction by 2035
for the SB 375 Target Update**

Dear Chairwoman Nichols:

The Western Riverside Council of Governments (WRCOG) staff would like to thank you for the opportunity to provide comments on the California Air Resources Board (ARB) staff report regarding the "Proposed Update to the SB 375 Greenhouse Gas Reduction Targets" which contains a **21%** per capita target greenhouse gas (GHG) reduction by 2035 for the SCAG region. WRCOG remains committed to advancing regional sustainability through our Subregional Climate Action / Adaptation Plan (adopted 2014) as well as other initiatives, and we strongly support the Southern California Association of Governments (SCAG) recommendation of an **18%** per capita GHG reduction target by 2035. This target is ambitious, but achievable through strategic, collaborative efforts ahead, including SCAG's development of the 2020 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). We believe ARB's draft recommendation of 21% per capita GHG reduction for the SCAG region by 2035 is not achievable for reasons detailed further below. We sincerely request due considerations from you and your fellow Board members when finalizing the target updates scheduled for October 2017.

As the Metropolitan Planning Organization representing 6 counties and 191 cities in Southern California, SCAG is responsible for developing the RTP/SCS for our region. WRCOG staff have worked closely with SCAG staff in the development of the 2012 and 2016 RTP/SCS, both of which exceeded the ARB target for 2035 (16% vs 13% for the 2012 RTP/SCS and 18% vs 13% for the 2016 RTP/SCS). I, along with Executive Directors from other subregional COGs, have been meeting regularly with SCAG Executive Director, Hassan Ikhata, and our staff collaborates regularly through the regional Technical Working Group and many other cooperative efforts aimed at improving the region's mobility and sustainability.

On April 6, 2017, the SCAG Regional Council approved the submittal to CARB of a recommended regional GHG per capita reduction target of 18% by 2035 (with conditions), the same achievement in the 2016 RTP/SCS. The four largest MPOs in the state also jointly recommended an 18% GHG reduction target to CARB on May 1, 2017. SCAG's 2016 RTP/SCS represents an ambitious plan that pushes the envelope in all strategies while protecting economic growth, job creation, and accessibility. WRCOG, through its many environmental, energy, and transportation initiatives, continues to contribute to region-wide GHG reductions and advancements in sustainability.

For the reasons discussed further below, ARB's draft recommendation of a 21% target will not be achievable without significant additional state investments and additional state-led strategies to reduce vehicle miles traveled (VMT).

First, the 2020 RTP/SCS will be challenged to maintain the 18% level of per capita GHG reduction for 2035 as in the 2016 RTP/SCS due to the VMT rebound effect, which recognizes that better fuel efficiency will lead to more driving—more VMT. The rebound effect is projected to leave a 5 percentage point gap to fill in order to maintain the 18% target. SCAG's Stress Test shows that Mobility Innovation & other new strategies may fill approximately 2.5 percentage points of the gap. SCAG, all 15 subregional COGs, and other partners have committed to partnering to fill the remaining 2.5 percentage point gap to reach the 18% level. Accordingly, the 18% per capita GHG reduction for 2035 represents an ambitious but achievable target for the SCAG region.

Second, SCAG's 2016 RTP/SCS (and upcoming 2020 RTP/SCS) had already largely accounted for the revenue from the 12-cents-per-gallon gas tax increase contained in SB 1 beginning in November 2017. Specifically, SCAG's RTP/SCS includes a 10-cents-per-gallon gas tax increase beginning 2020 through 2024, and a mileage-based user fee to replace existing gas taxes (state and federal) beginning in 2025. So this additional funding source would not be substantial enough to enable a 21% reduction target.

Third, the SCAG region has not received its fair share of funding from the Greenhouse Gas Reduction Fund, despite having almost half of the state's population and 67% of the state's disadvantaged community population. Without additional funding support, the SCAG region is disproportionately impacted by more aggressive GHG reduction targets.

Fourth, the June 2017 ARB staff report also contains numerous provisions that will only constrain options and make SCAG's efforts to achieve needed GHG reductions much more difficult.

Examples include:

- Rely predominantly on VMT strategies to reduce GHG (page 16, paragraph 2)
- Over-rely on SB 1 for GHG reduction (page 2, first full paragraph; and Page 19, last bullet)
- Dismiss the significance of the rebound effects in the SCAG region (page 20, paragraph 3)

In summary, WRCOG staff strongly support the SCAG recommendation of an 18% per capita GHG reduction target by 2035 for the region, which is ambitious but achievable, and aligns with WRCOG's subregional climate action planning efforts. We respectfully request due considerations from you and the rest of the ARB Board when finalizing the target updates scheduled for October 2017.

Thank you in advance for your consideration of the request. If you have any questions or require further clarification, please do not hesitate to contact me at (951) 955-8303 or rbishop@wrcog.us.

Sincerely,



Rick Bishop
Executive Director