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August 24, 2017

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

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

Dear Ms. Nichols:

The South Bay Cities Council of Governments (SBCCOG) would like to thank you for the opportunity to provide comments on the ARB staff report regarding the “Proposed Update to the SB 375 Greenhouse Gas Reduction Targets” which contains a **21%** per capita GHG reduction by 2035 for the SCAG region.

The SBCCOG believes ARB’s draft recommendation of 21% per capita GHG reduction for the SCAG region by 2035 is not achievable under current organizational principles and technical tools being deployed by SCAG and the State to address this issue. Based on this assessment, the SBCCOG supports the SCAG recommendation of **18%** per capita GHG reduction target by 2035. We request due consideration from you and the rest of the ARB Board when finalizing the target updates scheduled for October 2017.

As their April 6, 2017 meeting, SCAG Regional Council approved submittal to CARB of a recommended 18% greenhouse gas (GHG) per capita reduction target in 2035 (with conditions) for the region that is the same as the achievement in the 2016-2040 RTP/SCS. The four largest MPOs (SCAG, MTC, SACOG and SANDAG) also jointly recommended an 18% GHG reduction target to CARB on May 1, 2017. On June 13, 2017, CARB released a Staff Report regarding the “Proposed Update to the SB 375 Greenhouse Gas Reduction Targets,” including a 21% per capita reduction target for 2035 for the SCAG region which is 3 percentage points higher than the SCAG recommendation of 18%. While SCAG’s 2016-2040 RTP/SCS pushes the envelope, the SBCCOG believes that more can be done but there needs to be time to incorporate these strategies into the RTP/SCS and we hope to work with SCAG to do so.

ARB’s draft recommendation of 21% target will not be achievable unless there are significant additional state investments and additional state-led strategies to reduce VMT. The SBCCOG is in the final stages of preparing the Land Use and Transportation Chapter of a sub-regional Climate Action Plan pursuant to AB 32, funded by the California Strategic Growth Council. This Plan for coordinating land use and

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transportation in conditions of transit-poor dense sprawl is based on re-organizing destinations in order to increase the mode shares of walking, cycling and zero emission local use vehicles. This strategy of developing “sustainable neighborhoods” has the potential for reaching per capita GHG reductions targets that exceed the 21% proposed by the ARB in the many similar sub-regions found throughout the SCAG region. However, more time and funding are needed to advance the technical tools and methods needed for adding the Strategy as an option in the RTP/SCS.

The SBCCOG is also preparing a work plan for a full-scale demonstration of “sustainable neighborhoods” through a neighborhood oriented development (NOD) land use component and multi modal local mobility options. Funding for this demonstration will produce the metrics and methods needed for widespread adoption in Climate Action Plans and the 2020 and 2040 RTPs/SCS.

We are looking forward to working with the ARB and SCAG to identify ways to meet per capita GHG emissions targets significantly greater than those being proposed in 2017 for 2035 through alternative strategies as will be outlined in our Land Use and Transportation Chapter of our Climate Action Plan.

In summary, the SBCCOG strongly supports the SCAG recommendation of 18% per capita GHG reduction target by 2035 for the region which is ambitious but achievable. ARB’s draft recommendation of 21% per capita GHG reduction is not achievable and will be likely to set SCAG up for failure to develop an SCS to meet the target.

Sincerely,

Kurt Weideman, SBCCOG Chair
Mayor Pro Tem, Torrance