

Responses to Comments Received on Final Draft Sustainable Communities Strategy Program and Evaluation Guidelines

In issuing its [Final Draft SCS Program and Evaluation Guidelines], CARB staff solicited comments only on the most recent changes to the Guidelines. Many comments received were outside the scope of this request, however, CARB staff responded to all comments received.

No.	Comment from	Topic(s)	Comments	Detailed Responses
1	SJV	Elasticity analysis	As noted previously, we agree and are gratified with your observation that more work is required on this analysis before it is ready for prime time. We are supportive of the removal of this analysis from the guidelines at this time, and look forward to contributing to the refinement of this methodology.	As indicated in the Final Draft SCS Program and Evaluation Guidelines, CARB staff will continue to evaluate the use of elasticity analysis for possible inclusion in future updates to the SCS Program and Evaluation Guidelines. It is important to ensure that elasticity values are appropriate for the regions in the State, and thus will undertake a public process to explore alternative methods for evaluating the quantification of SCS greenhouse gas emissions and vehicle miles travelled. CARB staff will invite MPOs and other stakeholders including academia, NGOs, and other experts to participate.
2	SANDAG	Elasticity analysis	We appreciate the removal of the Elasticity analysis from these Guidelines and the additional evaluation that CARB will be conducting with participation from MPOs and other stakeholders.	As indicated in the Final Draft SCS Program and Evaluation Guidelines, CARB staff will continue to evaluate the use of elasticity analysis for possible inclusion in future updates to the SCS Program and Evaluation Guidelines. It is important to ensure that elasticity values are appropriate for the regions in the State, and thus will undertake a public process to explore alternative methods for evaluating the quantification of SCS greenhouse gas emissions and vehicle miles travelled. CARB staff will invite MPOs and other stakeholders including academia, NGOs, and other experts to participate.
3	ClimatePlan	Elasticity analysis	In the final draft for the SCS Program and Evaluation Guidelines, the elasticity analysis is completely removed from the Guidelines. For the undersigned organizations, this elasticity analysis was extremely important. When SB 375 was passed in 2008, it was a watershed moment, the first time a state passed a law to reduce emissions from the land use and transportation sector. However, the target-setting process under SB 375 has been dominated by the models, and targets have been relegated to a symbol--despite the 2017 Scoping Plan relying on reductions from the SB 375 targets. With the removal of this important section, it is unclear how CARB plans to clearly assess whether or not the SCS will achieve the applicable GHG emissions or if there's even scientific literature to support GHG emissions in the plan. While we understand there are concerns from the regional planning agencies around elasticity, we encourage CARB to run a transparent process--with regional planning agencies and key stakeholders--to find a compromise that meets all needs.	CARB has removed the elasticity analysis from the Final Draft SCS Program and Evaluation Guidelines, after further consideration of comments from various stakeholders. CARB staff will continue to evaluate the use of elasticity analysis for possible inclusion in future updates to the SCS Program and Evaluation Guidelines. It is important to ensure that elasticity values are appropriate for the regions in the State, and thus will undertake a public process to explore alternative methods for evaluating the quantification of SCS greenhouse gas emissions and vehicle miles travelled. CARB staff will invite MPOs and other stakeholders including academia, NGOs, and other experts to participate.

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4	ClimatePlan	Equity analysis	<p>when we reviewed the changes on pg. 29 of the Guidelines, we are concerned that the changes do not reflect the intent of the board when they stated “that SCSs contain a ‘robust social equity analysis’.” Initially CARB staff would report whether or not the MPOs were conducting equity analyses as a part of the RTP/SCS. While the SCSs are plans to reduce GHG emissions, it is important that those emission reductions are done equitably. We are supportive of the original language under equity because--as CARB understands--it is important that the SCSs clearly identify and address the equity implications of GHG emission reductions; having an entity such as CARB provide a report on these efforts provides a level of objectivity and accountability to ensure that this equity analysis is robust and meaningful. We encourage CARB to advance the conversation--and prioritize the needs of the most vulnerable communities--by providing that report of whether or not the MPOs are conducting a social equity analysis. We are supportive of aligning the social equity analyses with those listed in the 2017 RTP Guidelines, specifically those analyses in Appendix L, and encourage CARB to use the Guidelines to help identify if MPOs are using those types of analyses in their plans.</p>	<p>The Equity reporting component in the SCS Evaluation Staff Report will describe how MPOs identified vulnerable communities within the region, the metrics and performance measures used by the MPO to ensure no disproportionately high and adverse effects on human health and the environment, and the stakeholder outreach and engagement process established by the MPO. The equity reporting will be completed by the MPO or; CARB will include its own summary if an MPO does not, to meet the Board’s request for this analysis. This is still consistent with the CTC’s RTP Guidelines as required by state and federal transportation planning requirements.</p>
5	SJV	Equity analysis	<p>we appreciate the edits made in the guidelines, clarifying that any social equity analyses will be in accordance with California Transportation Commission guidelines, and that MPO staff will provide a write-up to be responsive to the criteria outlined in your final draft guidelines.</p>	<p>Comment noted.</p>
6	SCAG	Induced demand	<p>The requirements on the long-term induced demand analysis in the Guidelines are not clear. The only specific language in the Guidelines are two sentences: one on page 40 of the main report - “not assessing short- and long-run impacts of capacity-increasing projects and associated induced VMT in the region’s analysis, suggests to CARB that the SCS may be at risk of not meeting its GHG emission reduction targets;” and the other on page 7 of Appendix A – “Discussion of whether and how the travel model accounts for short- and long-term effects of induced demand for new roadway capacity projects.” Given the reasons explained in the second comment below, the Final Guidelines should explicitly provide each MPO with the flexibility to perform the long-term induced demand analysis most appropriate within the context of its region.</p>	<p>As discussed in the Final Draft SCS Program and Evaluation Guidelines, CARB has provided alternative approaches for MPOs to estimate induced travel- per page 40, "Tools are available to help MPOs evaluate the effects of induced travel. Examples include, but are not limited to, University of California, Davis National Center for Sustainable Transportation’s Induced Travel Calculator, available at: https://ncst.ucdavis.edu/research/tools/ and Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions. October 2013. Available at: https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf". Additionally, CARB has also provided flexibility to MPOs to develop their own approaches- per page 40 "Given that lead agencies have discretion in choosing their methodology, and the studies on induced travel reveal a range of elasticities, appropriate professional judgment may be used when evaluating the transportation effects. However, MPOs must document their methodology, assumptions, and datasets used to evaluate these effects."</p>

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7	SCAG	Induced demand	<p>SCAG staff strongly oppose the inclusion of the result of any long-term induced demand analysis in the final quantification of GHG emissions reduction from the SCS. It is commonly understood that a comprehensive land use model is needed for such analysis. However, most MPOs do not have a land use model to conduct a comprehensive long-term analysis on induced demand. Though elasticity analysis can be a useful approach, it is not comprehensive enough. New factors that will be emerged in the futures are not included in any past research. For example, aging trend in the future is less affected by highway improvement regarding their future decision on residential location (aging in place). SCAG is fully committed to improving our modeling capability as demonstrated by the recent completion and deployment of the activity-based travel demand model for SCAG's Connect SoCal. Due to the vast, diverse, and complex nature of the SCAG region, any significant transportation/land use modeling enhancement requires substantial resources and time. SCAG staff has been focusing on the development and implementation of the SCS strategies for Connect SoCal, consistent with ARB Board's direction on focusing future SCS evaluation on SCS implementation. We do not believe it is appropriate to add substantial requirement on modeling exercise as a comprehensive long-term induced demand analysis would be. In addition, some evaluation tools may be available as indicated in the Guidelines but these tools have not been comprehensively tested especially for the large SCAG region which is almost half of the state. Finally, ARB's SCS Program and Evaluation Guidelines do not include detailed guidance on how long-term induced demand analysis should be conducted as the Guidelines have done for the off-model analysis covering many off-model strategies.</p>	<p>CARB is not requiring an MPO to use an integrated land use and transportation model to estimate the impact of long-term induced demand. As mentioned in the above comments, the existing elasticity-based approaches robustly quantify the magnitude of induced VMT caused by capacity expansion projects. We recommend MPOs use an elasticity-based approach using elasticities from academic literature. We note that this is consistent with other state policy and these approaches are recommended to be used in other programs where induced travel must be assessed, such as SB 743.</p> <p>As indicated in the Final Draft SCS Program and Evaluation Guidelines, it is important to assess both short- and long-run impacts of capacity-increasing projects. This can be undertaken by employing elasticities taken directly from the large body of academic research on induced travel. These studies have been undertaken over a number of decades featuring substantial changes in state demographics, and continue to come to the same conclusion on the magnitude of the effect. Applied to the SCS, the magnitude of the VMT increase will indicate to CARB whether the SCS may be at risk of not meeting its GHG emission reduction targets.</p>
8	Mike Bullock	Induced demand	<p>(the guidelines) need to inform the MPOs that induced traffic demand is a fact; not a debatable theory.</p>	<p>As discussed in the Final Draft SCS Program and Evaluation Guidelines, CARB requests that MPOs quantify the induced travel demand, both for short-term and long-term impacts. It is also clearly stated that not assessing these impacts may suggest that an MPO's SCS may be at risk of not meeting its GHG emission reduction targets.</p>

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9	Irvin Dawid	Induced demand	<p>My comment is directed specifically at: Table 2. RTP/SCS Strategy and Key Action Examples [pg. 29] [https://ww2.arb.ca.gov/sites/default/files/2019-03/Draft_SCS_Evaluation_Guidelines_Report.pdf] Local/Regional Pricing : Relieve congestion and support pooling and transit usage (strategy examples) Key Action Examples:</p> <ul style="list-style-type: none"> • Provide incentives to local governments who reduce local parking requirements with zoning updates. • Establish bike share programs close to new multi-family housing units or provide an incentive funding source to developers to purchase bicycles for renters • Provide policy guidance for implementing local toll lanes <p>Specifically, it's the third bullet – toll lanes, aka high-occupancy-toll (HOT) lanes, to which my comments are directed.</p> <ol style="list-style-type: none"> 1. CARB must recognize that adding lanes, aka widening existing roads with additional lanes, goes contrary to the purpose of reducing VMT. CARB must inform MPOs that any widening plans would violate the intentions of SB 375. 2. An alternative to adding lanes would be to make existing lanes more efficient so that they carry more people, though not necessarily more vehicles, by converting both general purpose and HOV lanes to HOT lanes. A good example, to some degree, can be found in a plan in southeastern Virginia: Virginia Interstate Widening Would Convert Free Lanes to Toll Lanes 3. However, as that project by the Hampton Roads TPO indicates, while they are indeed converting both general purpose and HOV lanes to HOT lanes, they are also adding HOT lanes, which brings up my third point: NO NEW GENERAL PURPOSE LANES, PERIOD! All lane additions must be managed effectively for congestion, and ideally would include commute or regional buses, or ensuring that transit somehow be funded with a portion of toll revenues which is being done by many jurisdictions, e.g. Virginia's New 395 Express Lanes Guaranteed to Fund Public Transit, August 14, 2017 	<p>Table 2, "RTP/SCS Strategy and Key Action Examples," is provided to outline the range of strategies that an MPO might include. These are a few of RTP/SCS strategy types and some possible key actions for which MPOs can calculate GHG emission reductions under SB 375, and the presence of which CARB staff will evaluate.</p> <p>CARB is aware of the concerns to induced demand effects, especially associated with general purpose lanes. As stated in the Guidelines, MPOs need to estimate both short-term and long-term induced demand in the region. This will suggest to CARB whether the SCS may be at risk of not meeting its GHG emission reduction targets</p> <p>CARB is also sponsoring a research project on induced demand, specifically focusing on HOV and HOT lanes to better understand the impacts of induced demand on tolled facilities.</p>

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10	SJV	Plan-Over-Plan	<p>we continue to disagree regarding plan-over-plan analysis requirements in the guidelines. The rationale for requiring this analysis of the Valley MPOs was not transparent, and follow-up explanations from CARB staff have felt spurious and contrived. CARB negotiated with the four largest MPOs directly over what activities and what target percentages would be set for the next round of SCS development. Ultimately, they reluctantly accepted plan-over-plan analysis as part of a larger package of activities that included a target-setting reduction. The Valley was not accorded a similar courtesy or demonstration of partnership. Nevertheless, the Valley MPOs appreciate CARB staff's offer to assist in performing the necessary calculations for this analysis.</p>	<p>In 2018, the Board adopted targets for the Big 4 and Valley MPOs that were more aggressive than their previous targets. At the same time, the Board directed staff to assess how these MPOs would demonstrate additional progress through plan-over-plan reporting, with the specific technical details to be outlined in the Evaluation Guidelines. Based on direction provided by the CARB Board as adopted in the 2018 Updated Final Staff Report: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, all Valley MPOs are expected to track and report their increment of progress during the next SCS cycle. This information will not be used to determine whether or not an MPO's SCS meets its GHG target. Furthermore, an MPO does not need to devote additional resources to complete the plan-over-plan analysis; if an MPO is not able to do the analysis, CARB staff will complete it using strategy information and plan performance measures.</p>
11	SANDAG	Plan-Over-Plan	<p>In Figure 3, it is unclear as to whether the new SB 375 target adjusts based on the results of this analysis or if it quantifies the ease or difficulty of reaching the new target. Furthermore, would this analysis be conducted for all target years? Please update the figure to clarify its intent and include information on how changes to EMFAC get incorporated in this analysis.</p>	<p>Figure 3 is an illustrative example of how MPOs can demonstrate their incremental process. As indicated in the Final Draft SCS Program and Evaluation Guidelines, the incremental progress analysis illustrates how MPOs are stretching to achieve the GHG emission reduction targets through land use and transportation strategies and commitments from one SCS to another, which will be applicable to the 2035 target year. The purpose of this analysis is not to quantify the ease or difficulty of reaching the new target. It will also not affect the SB 375 targets. MPOs are welcome to generate their own tables/charts that can best convey the information.</p> <p>As we have elaborated in the Appendix D of the Final Draft SCS Program and Evaluation Guidelines, "MPOs should use the exact same methodology and version of EMFAC as used in the second RTP/SCS for the third." Hence, EMFAC changes should not affect the results of the incremental progress analysis. Therefore, no changes will be made to Figure 3 in the Final Draft SCS Program and Evaluation Guidelines.</p>
12	ClimatePlan	Partnership	<p>CARB staff stated that there would be a public process that allows us, the undersigned organizations -- as well as our community partners -- to be heard before CARB assesses an SCS for compliance with the new Guidelines. In terms of assessment, this public process would happen before the determination element and the reporting elements. We are very supportive and interested in ensuring this public process happens. We stand ready to discuss a proposal to ensure a transparent process.</p>	<p>CARB staff will consider additional relevant information provided by community stakeholders in a timely manner when assessing an SCS using the new Guidelines. Individuals are welcome to submit information directly to our review team through our program email inbox at: SustainableCommunities@arb.ca.gov. Information received by CARB staff becomes public record and may be posted with associated review documentation on our website.</p> <p>In order to allow enough time for consideration in CARB staff's review process, we request that information submittals be provided as soon as possible and no later than 15 days from the date of a given region's final SCS adoption date.</p>

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13	Steve Birdlebough	Tracking Implementation	<p>In following sustainable community strategies over a period of several years, I have observed a disconnect between the work at the Metropolitan Transportation Commission and in local governments. MTC offers grants for local planners to envision transit oriented developments. Some good plans emerge, but only a few infill projects served by high quality transit result. There is too little funding for expansion of transit, and road-widening projects continue to induce more people to drive longer distances.</p> <p>Most local officials are only vaguely aware that they should be reducing VMT per capita, and they have other more interesting things to attend to. Local planners and traffic engineers get only random VMT feedback, and have little motivation to depart from business as usual.</p> <p>Until success in reducing VMT per capita is made a criteria for those who actually issue building permits, sustainable communities will remain a nice theory.</p> <p>It would help for each city and county to know its current VMT per capita, and whether it is up or down from last year. Cell phone data is readily available to provide such information on an annual basis.</p> <p>Our elected officials are busy declaring climate emergencies, but their constituents lack the metrics and annual milestones to hold them accountable for making needed changes. You can remedy this problem.</p>	<p>Recently CARB has published the SB 150 report (2018 Progress Report on California's Sustainable Communities and Climate Protection Act), which discusses progress related to SB 375 implementation. This report has assessed the progress made towards meeting the regional GHG emission reduction targets, and provided per capita VMT trends over the past decade at the state level. The report also discussed that while the California Department of Transportation's (Caltrans') Highway Performance Monitoring System (HPMS) does provide VMT estimates by county, CARB found irregularities that need to be addressed before this information can be used for monitoring change at the county level. CARB staff has communicated with Caltrans regarding the VMT data concerns. Caltrans has initiated various data improvement efforts to support and enhance the capabilities of the State to collect and integrate data from federal, state, and local agencies. Therefore, CARB staff hope to utilize the VMT data from HPMS in future SB 150 reports and provide per capita VMT trends at the county level.</p>
14	Dan Woo	Partnership	<p>We just wanted to send an internal comment to the CARB team regarding additional resources/tools available that can help provide deeper insights regarding community health, and climate and health vulnerability. We see these tools as resources that can help identify vulnerable communities, including indicators that look at housing, transportation, and other social and environmental conditions that contribute to health outcomes, as well as specific indicators that address environmental exposures, population sensitivity, and adaptive capacity to key climate related risks/impacts (i.e., extreme heat, drought, wildfires, sea level rise, and air pollution). These are tools that have been incorporated into other state climate programs (i.e., SGC's TCC Program, Caltrans Sustainable Transportation Planning Grants, and more) to help with identifying vulnerable communities, understanding community health, and more.</p> <p>California Healthy Places Index (HPI): https://healthyplacesindex.org/</p>	<p>Comment noted. Thank you for the information.</p>

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15	SANDAG	Incremental progress	Pages 11-12 describe Board Resolution 18-12, which directed CARB to include incremental progress between updates to Regional Transportation Plans (RTPs) and SCSs. The factors listed for these incremental progress updates are a limited set of factors that influence the ability to quantify how much impact policies and programs have had. SANDAG has no authority or control over several land use and economic factors in the region (e.g., military lands, sovereign tribal nations, cross-border demand, tourism).	CARB recognizes that each region is unique and faces various challenges and uncertainties. It is understood that MPOs do not have land use control. Further, the methodology to quantify the Incremental Progress may also vary for each MPO depending upon the tools available and other factors influencing exogenous variables. Hence, CARB staff are willing to work with respective MPOs in conducting the Incremental Progress analysis as appropriate for their respective region.
16	SANDAG	Clarification on unchanged part of the GLs	The New Mobility row in Table 2 states "partner with local agencies to provide electric vehicle car share programs." Please clarify if electric vehicle car share impact needs to be reflected in an off-model calculator, since the default vehicle fleet included in EMFAC does not provide much flexibility.	CARB staff is flexible on how MPOs quantify the GHG emission reductions from its strategies, depending on the capability of MPOs' tools. SANDAG may use an off-model calculator to quantify reductions associated with electric vehicle car share, but these methods should be clearly documented in the Technical Methodology submittal. No changes will be made to the text in the Final Draft SCS Program and Evaluation Guidelines.
17	SANDAG	Clarification on unchanged part of the GLs	On page 33, seat utilization is listed as a performance indicator for an RTP/SCS. In future forecasts, it is difficult to know the exact seating capacity of a transit vehicle; this is usually determined by transit operators based on the demand for the system. Please consider revising this indicator to include boarding per vehicle mile or passenger miles per vehicle mile.	As stated in the Final Draft SCS Program and Evaluation Guidelines on page 32, "MPOs may provide data for alternative performance indicators, as applicable. By providing alternative data, MPOs may also need to provide an explanation for applicability".
18	SANDAG	Clarification on unchanged part of the GLs	Page 36 includes a description of how data will be used by CARB staff. It seems that CARB is asking for very specific and detailed metrics that could then be used in a subjective manner. Please address with specificity how these measures will be used in evaluation.	The purpose of the Guidelines is to describe CARB's approach for the third round of SCS evaluation. The document describes what information and data MPOs should submit to CARB and how CARB will use this data to make a determination. Sections II, III, and IV are about how data submitted by MPOs will be used in the evaluation. To be more specific, the data we request will be used for four sections: Tracking Implementation, Policy Commitments, Incremental Progress, and Equity, as shown in Figure 1 of the Final Draft SCS Program and Evaluation Guidelines. Collectively, these four components constitute the SCS Evaluation Staff Report prepared by CARB staff. Within the four components, the Policy Commitments component is the only component used by CARB staff as the basis for accepting or rejecting the MPO's SB 375 GHG emission reduction target determination. The other three reporting components, which also request data input from MPOs, are included to identify the effectiveness of prior SCS implementation and increase overall transparency of the SCS for the public and other stakeholders.

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19	SANDAG	Clarification on unchanged part of the GLs	In the travel time by mode row in Table 4, CARB shows non-auto mode travel time decreasing in out years. When non-auto modes (e.g., walking, biking, transit) get larger mode shares in out years, however, it is possible that travel time increases. Travel time is not the only factor in a person's choice of using non-auto modes. Transit fare, auto operating cost, the number of transfers required, and household income all impact mode choice. It is possible that as the market for non-auto modes expands to those that live farther from activity centers that the travel time for these modes might increase. Please clarify if CARB's evaluation focuses on non-auto mode share increase or on non-auto mode trip length decrease.	Page 39 of the Final Draft SCS Program and Evaluation Guidelines states, "If the directionality of the performance indicators from the Trend Analysis is inconsistent with planned outcomes from the RTP/SCS, CARB will work with the MPO to provide potential additional information and context for trend inconsistencies". Specific to this comment, the trend analysis will test if the non-auto mode travel time is decreasing. If an MPO's non-auto mode travel time is not decreasing over time and is inconsistent with literature, CARB staff will work with the MPO to provide potential additional information and context for why this inconsistency does not conflict with the overall SB 375 target.
20	SANDAG	Clarification on unchanged part of the GLs	In the household per capita Vehicle Miles Traveled (VMT) row in Table 4, it is not clear if the VMT metrics includes VMT generated by non-residents. Please clarify if this type of VMT (e.g., VMT generated by visitors or commercial vehicles) should be included.	All VMT/GHG referenced in the Final Draft SCS Program and Evaluation Guidelines, unless otherwise specified, refers to VMT/GHG under SB 375, which includes residents, employees, and visitors.
21	SANDAG	Clarification on unchanged part of the GLs	<p>The policy analysis section on page 46 includes new mobility. As new mobilities will likely increase VMT, please clarify how CARB's evaluation considers the VMT impact of these new mobilities and how this impacts an MPO's ability to meet greenhouse gas (GHG) reduction targets. Furthermore, several studies show that transportation network companies (TNCs) will increase VMT. If TNCs continue to grow in the future, the recommended trend analysis of VMT and GHG per capita metrics will likely increase. Please clarify how this impacts an MPO's ability to meet GHG reduction targets.</p> <p>There are many uncertainties associated with connected and autonomous vehicles (CAVs). The impact of CAVs on key metrics (e.g., VMT, mode share, GHG emissions) may be largely driven by assumptions. Please clarify CARB's recommended assumptions for CAVs for use by MPOs.</p>	<p>New mobility encompasses a variety of modes such as carsharing, bike/ scooter sharing, microtransit, autonomous vehicles, and TNCs. In the policy analysis section, new mobility policy refers to strategies that can help reduce regional VMT. If an MPO utilizes new mobility strategies, they should be clearly documented, and the method should be outlined in the MPO's Technical Methodology.</p> <p>Additionally, if an MPO is not going to use new mobility as a strategy, but reflects the impact of this technology on regional travel, they should also clearly document these assumptions and impacts.</p>
22	SANDAG	Clarification on unchanged part of the GLs	The travel models used by MPOs vary significantly when it comes to CAVs, TNCs, and micromobility. Some have very nuanced treatment of these types of nobilities, and others rely on off-model calculators. This will likely cause significant difference in terms of how these new mobilities impact VMT and GHG emissions. Please clarify if CARB has a standard methodology of how an MPO's travel model should treat these new mobility.	CARB staff is flexible on how MPOs quantify the GHG reductions from its strategies (including CAVs, TNCs and micromobility), depending on the capability of MPOs' tools. In other words, an MPO may use a travel demand model or an off-model approach to estimate the benefits of CAVs, TNCs and micromobility.

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23	SANDAG	Clarification on unchanged part of the GLs	<p>List of Exogenous Variables -Table S Please consider the following additions to Table 5:</p> <ul style="list-style-type: none"> •Military population/employment •Tribal population/employment •Airport enplanements (e.g., San Diego International Airport, Tijuana International Airport) •External to internal projections (e.g., Mexico cross border demand, Southern California to San Diego demand) •Institutionalized group quarter population •Population age breakdown 	<p>Table 5 in the Final Draft SCS Program and Evaluation Guidelines provides a list of recommended exogenous variables that should be considered in the incremental progress analysis. This table is not meant to be exclusive of other variables appropriate to a specific MPO. Regarding the suggested variables, some of them are not universal across MPOs, such as military population, tribal population, and external to internal projections. Depending on the regional characteristics, some MPOs may have an additional list of exogenous variables that are necessary to normalize the incremental progress analysis, which should be included in their Technical Methodology submittal. Therefore, it is not necessary to make changes to Table 5 of the Final Draft SCS Program and Evaluation Guidelines.</p>
24	SANDAG	Clarification on unchanged part of the GLs	<p>Please clarify if the information to be submitted in Table 6 is to be calculated pursuant to CARB rulemaking(s) or if each MPO will determine the method for calculating these metrics. Comments on specific metrics are included below:</p> <ul style="list-style-type: none"> •Modeled population: Does this include institutionalized group quarter population? •Average toll price: Toll pricing varies by facility, such as whether the facility is a managed lane with dynamic tolls or a standard toll road. Clarification is needed on how this metric should be derived. For example, lane-miles of priced facilities may need to be broken out by type of tolled lane. •High-quality transit stations: Please clarify if the definition of "high-quality" follows the State laws for SB 743 (Steinberg, 2013) analysis. •Average trip length, travel time, mode share: Are these for residents, all travelers, or internal trips only? Please help to define the metric calculation further. Additionally, please clarify if transit trip length includes access and egress distances. Last, please clarify if transit travel time includes access time, egress time, initial wait time, and transfer and other wait time. •Household vehicle ownership: Please clarify if CARB requires MPOs to produce vehicle ownership by AV and non-AV for future years. •Mode share: Not every MPO has the ability to model for "drive alone TNC" and "shared ride TNC" modes, and those who are able to model for these modes are doing so by way of an off-model calculator. This will likely cause significant differences in TNC mode share by region. Please clarify CARB's recommended approach for calculating these modes. •I/IX/XI/XX VMT: Are these terms defined by trip or by tour? If an IX or XI tour has multiple stops within a region, are all tour trips designated IX/XI, or is it by trip segment? 	<p>SANDAG may find definitions and examples for calculating RTP/SCS data and performance indicators needed by CARB in an MPO's data submittal on Pages 20-23 in Appendix C of the Final Draft SCS Program and Evaluation Guidelines. As indicated on page 61, "CARB staff will be flexible in allowing changes to the table format and/or parameters should data be unavailable or not applicable." Furthermore, CARB staff will work with MPO staff to clarify the data request prior to the data submittal. Additionally, MPOs are welcome to provide their alternative list of performance metrics, as long as they clearly document the definitions, the quantification, and the data source in the Technical Methodology.</p>

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25	SACOG	Clarification on unchanged part of the GLs	<p>Several specific issues of concern have been raised with your staff. First, the draft guidance would require SACOG to use the version of EMFAC (EMFAC2011) used for our 2016 plan. In our submitted technical methodology, we outlined the options for the available versions of EMFAC and stated a preference for using EMFAC 2014. We received a written response from ARB staff that either EMFAC 2011 or EMFAC 2014 would be acceptable. Relying on that response, we have used EMFAC 2014 for all substantive development work on our 2020 SCS. It would be manifestly unfair to impose a different requirement.</p> <p>We should also note that this proposed requirement—to use the exact same and version of EMFAC used for the prior SCS—is erroneous for at least the following reasons.</p> <ul style="list-style-type: none"> • It is inconsistent with SB 375. While the draft guidance focuses on consistency with prior plans, SB 375 prescribes ARB’s responsibility in reviewing technical methods as follows: “...specifically describing any aspects of that methodology it concludes will not yield accurate estimates of greenhouse gas emissions...” (Government Code section 65080, subdivision (2)(J)(i).) Unless EMFAC2014 is demonstrably less accurate than EMFAC2011, the statute does not compel use of an older version of EMFAC. • The principle promoted—consistency with the prior SCS—is not applied to other technical areas. For example, the estimation of auto operating costs is explicitly NOT held constant to the assumptions of the prior SCS. It is appropriately updated based on current information at the time the new SCS is initiated. • The proposed approach is impractical. If the version of EMFAC is tied to that used in a specific prior SCS (in this case, the 2016 SCS for SACOG), will EMFAC2011 also be required for SACOG’s 2024 SCS, and every SCS thereafter? 	<p>As indicated in the Final Draft SCS Program and Evaluation Guidelines, the fleet-wide CO₂ emission rates in the EMFAC model vary from one version to the next due to changes within the EMFAC model (e.g. new vehicle testing data, vehicle fleet mix, etc.). This can change the performance of an MPOs RTP/SCS, even if nothing else changes in the RTP/SCS. Thus to prevent an MPO from benefiting or dis-benefiting from a change to the EMFAC model (not related to their plans), CARB will assess the performance of the third SCS using the exact same methodology and version of EMFAC that was used for the MPO’s second RTP/SCS. Effectively, this ensures that should nothing else change, the performance of the third RTP/SCS will be identical to the second RTP/SCS. Furthermore, the March 2019 Draft SCS Guidelines also clearly stated that “MPOs should apply the exact same methodology and version of EMFAC used in the second RTP/SCS for the third”.</p>
26	SACOG	Clarification on unchanged part of the GLs	<p>Our second specific concern relates to the method of calculating auto operating costs in the draft guidance. Again, this guidance, even if finalized immediately, arrives much too late for SACOG to incorporate it into our modeling. We believe our approach, consistent with that previously approved by the ARB, is appropriate and sound.</p>	<p>The Auto Operating Cost Tool is not mandatory to use in an RTP/SCS as long as an MPO calculates the auto operating cost including alternative fuels such as electricity, hydrogen, and gasoline-electric (plug-in hybrid). The calculator was mainly developed for MPOs who do not have enough resources or staff to develop a tool.</p>
27	Mike Bullock	Strategy	<p>The Draft’s Table 6 shows that you understand that the price to drive could, if it was sufficiently large, affect VMT. However, you fail to treat the option of changing pricing with specific measures with the rigor it deserves. Pricing-related measures are critical. Increasing the price to drive and park is by far the most cost-effective way to reduce VMT.</p>	<p>Pricing strategies are important to reducing VMT and providing revenue to support sustainable travel alternatives. CARB’s 2018 Progress Report on California’s Sustainable Communities and Climate Protection Act acknowledges its importance, as well as the need to better align current transportation spending with state health, equity, economic and environmental priorities.</p>

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28	Mike Bullock	Strategy	<p>CARB must also submit to the MPOs all of the enforceable mitigation (“GHG-reducing”, which means, under SB 375, “VMT-reducing”) measures that have been identified to CARB, including those in this letter. CARB must inform the MPOs of their responsibility under CEQA to include all VMT-reducing measures that have been identified; including those in this letter, after CARB has forwarded those measures to the MPOs.</p> <p>Please recognize that writing and implementing your Sustainable Communities Strategy (SCS) Program and Evaluation Guidelines is itself a discretionary project under CEQA. A poor job will contribute to our demise. A great job will solve the problem we have with LDVs, in California and, considering the legal concept of cumulative effects, all state and all countries. Therefore, the mitigation measures that have been identified to you, including those in this letter, must be implemented.</p> <p>Which suggested mitigations (ways to reduce GHG emissions) should be ignored and which ones should be implemented? Your own updated Scoping Plan says that all mitigations should be implemented if they are “technologically feasible and cost effective”. CARB and the MPOs need to apply this criterion to all of the identified mitigation measures, including those in this letter.</p>	<p>Regarding the CEQA-related aspects of this comment, that portion is beyond the scope of this public comment period, and no response is necessary. However, CARB provides the following response.</p> <p>CARB adopted an update to the SB 375 Regional GHG Emissions Reduction Targets at its March 22, 2018 Board hearing. CARB prepared an Environmental Analysis (EA) that fully evaluated the environmental impacts associated with the proposed action to update the SB 375 GHG emissions reduction targets (see https://ww3.arb.ca.gov/cc/sb375/sb375_target_update_final_ea.pdf?_ga=2.220030042.2126678372.1573754486-1470533428.1507244128). The Board adopted the findings in that EA prior to adopting the 2018 Target Update, and that EA included a programmatic analysis of environmental impacts and mitigation measures associated with the types of strategies that would be included in MPOs’ SCSs in order to meet the 2018 Targets.</p> <p>CARB disagrees with the commenter that the Updated SCS Evaluation Guidelines constitute a discretionary project approval under CEQA. The Guidelines do not commit CARB to any course of action beyond that analyzed in the prior EA. The Guidelines clarify the process of SCS evaluations but do not include any requirements or commitments for CARB or other parties.</p> <p>Even if staff’s development of the Guidelines did constitute an “approval” under CEQA (which it does not), it does not alter the scope of the previous approval or EA in any way. The Guidelines were prepared in response to the Target Update at direction from the Board. CARB staff’s method for evaluating whether SCSs would meet the 2018 Regional GHG Targets is within the scope of the EA prepared for the 2018 Target Update, because the types of strategies and mitigation measures that would be included in those SCSs were contemplated in CARB’s 2018 EA prepared for the 2018 Target Update. Therefore, no further CEQA analysis would be required here in any event.</p>
29	Mike Bullock	Strategy	<p>Reallocate the MPO’s Funds Earmarked for Highway Expansion to Transit and Consider Transit-Design Upgrades The money spent to add lanes is not just a waste of money. With more lanes and the same level of congestion as before, the result is always more frustrated drivers, more VMT, more air pollution, and more GHG emissions. SANDAG and CARB need to help educate the public about the futility of adding lanes because of induced traffic demand, as well as our responsibility to have a plan showing how cars and light-duty trucks can achieve climate-stabilizing targets. This will reduce political risk.</p> <p>CARB and all of the MPOs need to urge California to create an effective RUC pricing-and-payout system. Legislation is needed to get the design and implementation moving. MPOs and CARB should lobby for a good system. The MPOs should be able to assume such a system in their RTPs and the EIRS that they will do for their RTPS. Such a system will play a useful role in reducing per-capita driving.</p> <p>calls for “shared, convenient and value-priced parking, operated with a system that provides earnings to those paying higher costs or getting a reduced wage, due to the cost of providing the parking.” This has been defined as “Dividend Account Parking” (DAP).</p>	<p>Thank you for your comments. The Final Draft SCS Program and Evaluation Guidelines proposes an update to the July 2011 Description of Methodology for ARB Staff Review of Greenhouse Gas Reductions from Sustainable Communities Strategies Pursuant to SB 375 in order to evaluate the SCSs. This is not a regulatory document, and CARB does not have the authority to require specific strategies/mitigation measures that “must be implemented” under the SB 375 law. The local jurisdictions and regional agencies’ are responsible for developing and implementing SCS strategies in their regions under the SB 375 program. Therefore, this comment on requesting and prescribing strategy implementation procedures is outside the scope of the Final Draft SCS Program and Evaluation Guidelines.</p>

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30	Mike Bullock	Strategy	<p>Good Bicycle Projects and Bicycle Traffic Skills Education:</p> <p>All of the smart-growth neighborhoods, central business districts, and other high trip destinations or origins, both existing and planned, should be checked to see if bicycle access could be substantially improved with either a traffic calming project, a “complete streets” project.</p> <p>Most serious injuries to bike riders occur in accidents that do not involve a motor vehicle. Most car-bike accidents are caused by wrong-way riding, riding on sidewalks, and errors in intersections; the clear-cut-hit-from-behind accident is rare. After attending Traffic Skills 101, students that pass a rigorous written test and demonstrate proficiency in riding in traffic and other challenging conditions could be paid for their time and effort.</p> <p>Eliminate or Greatly Increase the Maximum Height and Density Limits Close to Transit Stops that Meet Appropriate Service Standards As sprawl is slowed and hopefully stopped, more compact, transit-oriented development (TOD) will need to be built. This strategy will incentivize a consideration of what level of transit service will be needed, how it can be achieved, and what levels of maximum height and density are appropriate. Having no limits at all is reasonable if models show that the development can function without harming the existing adjacent neighborhoods, given the level of transit service and other supporting transportation policies. One such supporting transportation policy would be the use of the DAP car-parking system described above, which supports sharing of parking, less driving, and less car ownership.</p> <p>Eliminate or Greatly Increase the Maximum Height and Density Limits Close to Transit Stops that Meet Appropriate Service Standards As sprawl is slowed and hopefully stopped, more compact, transit-oriented development (TOD) will need to be built. This strategy will incentivize a consideration of what level of transit service will be needed, how it can be achieved, and what levels of maximum height and density are appropriate. Having no limits at all is reasonable if models show that the development can function without harming the existing adjacent neighborhoods, given the level of transit service and other supporting transportation policies. One such supporting transportation policy would be the use of the DAP car-parking system described above, which supports sharing of parking, less driving, and less car ownership.</p>	<p>Thank you for your comments. The Final Draft SCS Program and Evaluation Guidelines proposes an update to the July 2011 Description of Methodology for ARB Staff Review of Greenhouse Gas Reductions from Sustainable Communities Strategies Pursuant to SB 375 in order to evaluate the SCSs. This is not a regulatory document, and CARB does not have the authority to require specific strategies/mitigation measures that “must be implemented” under the SB 375 law. The local jurisdictions and regional agencies’ are responsible for developing and implementing SCS strategies in their regions under the SB 375 program. Therefore, this comment on requesting and prescribing strategy implementation procedures is outside the scope of the Final Draft SCS Program and Evaluation Guidelines.</p>

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31	Todd Litman	Strategy	<p>1. Include more information about innovative transportation pricing reforms, including pay-as-you-drive (PAYD) vehicle insurance, fees and taxes, and parking cash out, as discussed in Allen Greenberg & John (Jay) Evans' report, Greenhouse Gas Reductions and Implementation Possibilities for Pay-to-Save Transportation Price-shifting Strategies (www.vtpi.org/G&E_GHG.pdf).</p> <p>2. Add more information on parking policy reforms, including reducing or eliminating minimum parking requirements, and parking unbundling, as described in Parking Management (www.vtpi.org/park_man_comp.pdf) and The Hidden Cost of Parking Bundling (https://bit.ly/33fhnk)</p> <p>3. Include more information on mandatory Commute Trip Reduction (CTR) programs, such as in Washington State (www.wsdot.wa.gov/transit/ctr/home), which requires large urban employers to implement commute trip reduction plans.</p> <p>4. Development of transportation management associations (TMA) that provide transport and parking management services in a particular area, such as a downtown, medical center or industrial park.</p> <p>5. Recognize the many co-benefits provided by more compact development, more multi-modal transport planning, and reduced vehicle travel, including road and parking infrastructure cost savings, consumer savings and affordability, more independent mobility for non-drivers, improved public fitness and health, reduced chauffeuring burdens, and reduced sprawl costs.</p>	<p>As you may know, many MPOs in California already consider some of these strategies as part of their RTP/SCS. CARB has also published policy briefs and technical background documents for some of these strategies on our website at: https://www3.arb.ca.gov/cc/sb375/policies/policies.htm.</p>
32	SACOG	Application of this guidelines document for SCS review	<p>Therefore, we request that the draft guidance be inapplicable to a draft SCS circulated pursuant to Government Code section 65080 prior to the finalization of the guidance.</p> <p>SACOG circulated its draft final SCS on September 20th. However, SCS development has been underway for several years. By August 2018, SACOG submitted its proposed technical methodology.</p> <p>Obviously, to get to this point, significant technical work, communications about the SCS with our member agencies, Board of Directors, stakeholders, and the general public have been completed. Retroactive application of the guidance in these circumstances would be inappropriate.</p>	<p>In March 2018, CARB updated the SB 375 GHG emission reduction targets. As part of that action, the CARB Board directed CARB staff to change its evaluation of MPO SCSs to place greater attention on the strategies, key actions, and investments committed by the MPOs. The Board also directed CARB staff to develop additional reporting and tracking guidance. The Draft SCS Program and Evaluation Guidelines was first released in December 2018, and revised in April and September 2019. The drafts were largely thematically and substantively the same as what the board directed CARB to do and what CARB staff is proposing in the final version. Therefore, SACOG has been aware and participating in what CARB is issuing for over a year. During the SCS evaluation, CARB will make its determination based on the available information in the RTP/SCS and the information that is provided to CARB. These Guidelines are intended to reflect SB 375's requirements, board direction, and what CARB believes will help staff to make the best assessment.</p>
33	Mike Bullock	Effectiveness of SB 375 and strength of the GL	<p>My overall comment is that the Draft Sustainable Communities Strategy (SCS) Program and Evaluation Guidelines ("Draft") is inadequate. This means that the changes proposed must be much more extensive.</p>	<p>The SCS Program and Evaluation Guidelines were developed through a robust public process that included engagement with various stakeholders, multiple workshops throughout the state, and three rounds of draft documents for public review and comments.</p>
34	Mike Bullock	Effectiveness of SB 375 and strength of the GL	<p>Given that cars last, on average, nearly 15 years and given that even in 2019 many internal combustion engine vehicles are being sold, it is true that we must achieve significant reductions in VMT. This truth needs to be told to the general public, the California Executive Branch, the California legislature, and, most importantly, to the MPOs. Thank you for stating this as often as you have.</p> <p>This information needs to be quantified. That is why it is so important</p>	<p>In terms of the vehicle age impacts, currently, when MPOs quantify the on-road GHG emissions, the vehicle age distribution is taken into consideration through quantification tools (i.e., EMFAC model). Therefore, the current GHG emission estimates already reflect the impact of vehicle age and turnover.</p> <p>Reference 3 provided by the commenter is about the alternative climate metrics and vehicle technologies. While related to the transportation GHG emission reductions, it is outside the scope of the SB 375 program. The SB</p>

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			that CARB adopt Reference 3 or construct its own version of Reference 3.	375 program is focused on reducing per capita GHG emissions through coordinated land-use and transportation strategies.
35	Mike Bullock	Outside SB 375	<p>Air is a resource. It is being loaded up with GHG, to the point where our (homo-sapiens) existence will probably be ended. CARB has a responsibility to understand this and take responsibility in an effort to avoid our demise, which will, by the way, come about primarily by starvation. Starvation is a severe health and safety issue. CARB never addresses or acknowledges these truths. EIRs also do not. The problem is that they all use the misinformation generated by our Office of Policy Research (OPR). All of the climate crisis information provided by the OPR is true. However, the fact that climate destabilization will end most life forms on earth, is never stated. This is a lie by omission. All of the consultants that write EIRs (mindlessly, I might dare say), simply follow the example of the OPR in their description of our climate crisis. It is CARB's responsibility to expose the OPR's error. To avoid climate destabilization, anthropogenic emissions must first be reduced enough to stop the level of atmospheric CO₂e from continuing to increase. This needs to happen as soon as possible. If it happens too late, we could still suffer a "devastating collapse of the human population", regardless of our actions, after the warming feedbacks become dominant. CARB must explain both "stabilizing the climate at a livable level" and "climate destabilization."</p> <p>EIRs must identify the most significant impact of all. The extinction of humanity, which would come about if we fail to achieve climate-stabilizing targets, is almost certainly the most significant impact of all. Only identifying such effects as more fires, heat waves, droughts, ocean acidification storms, and some amount of sea-level rise, while both true and useful, is insufficient and a violation of CEQA law. CARB needs to work to make us smarter about our climate challenge. Without significant decreases in our emissions, we will eventually go extinct. That is not a theory. It is a fact. It needs to be clearly stated to the decision makers and all of those that read the EIRs for the RTPs that you will evaluate under your guidelines.</p>	This comment is outside the scope of the SCS Program and Evaluation Guidelines.
36	Mike Bullock	Outside SB 375	Certainly, California Climate mandates are important. However, based on current climate science, they are unfortunately NOT climate-stabilizing.	This comment is outside the scope of the SCS Program and Evaluation Guidelines.

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37	Mike Bullock	Outside SB 375	<p>CARB never addresses the relationship between California’s climate mandates and what the climate scientists are telling us are the GHG emission reductions that we must achieve. Without ever stating it, CARB seems to be assuming that the California climate mandates are “good enough.” If CARB thinks that it has no legal authority to consider climate stabilization but must instead just consider the climate mandates, it needs to state that, so as to not confuse the general public.</p> <p>CARB needs to supply References 1 through 5 to the MPOs. (Note: Reference 1-4 are all from CDP on climate literacy, and Reference 5 is a testimony for a climate lawsuit).</p>	This comment is outside the scope of the SCS Program and Evaluation Guidelines.
38	Mike Bullock	Outside SB 375	<p>Also, please make it clear that:</p> <ul style="list-style-type: none"> • Cars and light-duty trucks (LDVs) is by far the largest category of GHG emissions and • This category (LDVs) will not achieve the state’s climate mandates (Executive Order B-55-18 and SB-32), let alone achieve climate-stabilizing targets (which will require larger GHG emission reductions than the state’s climate mandates), without significantly reducing VMT. <p>The following statements are made in light of the well-established legal principle of “cumulative impacts”, meaning that the outcome of a project (in this case the project is evaluating MPOs proposed RTPs and helping MPOs to do better) must be considered under the assumption that other similar projects will be no better and no worse than the CARB effort. This is the answer to the illogical statement that CARB’s work will be too small to affect the outcome of our anthropogenic climate-change crisis. Given our anthropogenic climate crisis, hereby often denoted by the single word “climate”, this project will literally either support human survival or contribute significantly to human extinction. The words of the current draft unfortunately do not suggest that the stakes are anywhere near that high. The words also do not provide sufficient help to the MPOs.</p> <p>The evaluation must also show compliance or non-compliance with achieving “climate-stabilizing targets”, where “climate-stabilizing targets” means targets that will, considering cumulative impacts, prevent “climate destabilization”.</p>	<p>This comment is outside the scope of the SCS Program and Evaluation Guidelines. For more information about the State's other climate programs, please refer to the Scoping Plan Program website: https://ww3.arb.ca.gov/cc/scopingplan/scopingplan.htm</p>

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39	TRANSDEF	Outside SB 375	<p>Our message over the past decade has been consistent: ARB is only pretending to try to reduce transportation GHG emissions. Along with the rest of the State's bureaucracy, ARB has been unwilling to implement effective programs to reduce the VMT, GHG and congestion impacts of solo driving. Implementation of SB 375 has been a failure, as indicated by the statewide rise in VMT. We believe the former Governor ordered this hands-off approach, to avoid political controversy. We hope the new Governor will have the courage and commitment to order a change in direction. The release of the 2018 Progress Report should have triggered Board direction to evaluate what went wrong with the transportation GHG emissions program. Instead, with these Guidelines, the agency is doubling down on a strategy that is a proven failure. Does senior management really want to be remembered for dragging its feet? The world is changing, but ARB remains stuck in its "let's pretend we're reducing VMT" past. More of the same by ARB is completely unacceptable in the wake of the Climate Strike. Adopting the Final Draft SCS Program and Evaluation Guidelines would constitute an endorsement of the failed implementation of SB 375, strongly implying that the program is working well. That would be a profoundly cynical step by the nation's self-proclaimed Climate Leader.</p>	<p>This comment is outside the scope of the SCS Program and Evaluation Guidelines. For more information about the State's other climate programs, please refer to the Scoping Plan Program website: https://ww3.arb.ca.gov/cc/scopingplan/scopingplan.htm</p>
40	Mike Bullock	Outside SB 375	<p>I now know that the CDP is by far the most important environmental-advocacy organization in California. I urge you to read its platform. As you probably realize, the CDP is also an important political organization in California.</p>	<p>This comment is outside the scope of the SCS Program and Evaluation Guidelines.</p>

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41	Mike Bullock	Outside SB 375	<p>The California Democratic Party (CDP) takes climate change and transportation seriously...(and he provided References1-4) created by CDP.</p> <p>...There is another set of enforceable measures (transportation strategies) to achieve the reduction in per-capita driving. Reference 3 is the actual report. (Reference 3 relies on pricing strategies.) Reference 4 is the Power Point version of Reference 3. Note that CARB should produce its own version of Reference 3. Until that is done, CARB should use Reference 3, to ensure that it is doing its part to help humanity avoid destabilizing the climate, which would, by the way, end almost all life forms on Earth, including our own species. Until CARB creates its own versions of References 3 and 4, CARB should make Reference 3 and Reference 4 available to all those conducting an EIR process on a discretionary project that has a climate component.</p>	This comment is outside the scope of the SCS Program and Evaluation Guidelines.
42	Tom Lichterman	Outside SB 375	<p>I am writing to voice support for the recommendations Mike Bullock has made to CARB in requiring MPO's to incorporate all feasible GHG- and VMT-reducing measures in their transportation plans. I am also attaching a letter from our Committee to our local Assembly Member, Tasha Boerner Horvath, requesting that she sponsor legislation that would direct that:</p> <p>The California Air Resource Board (CARB) shall develop, within one year, a plan, for Light Duty Vehicles (LDVs), that contains a set of enforceable measures, that would cause the Light Duty Vehicles (LDVs) that are being driven in California to emit greenhouse gas (GHG) at a sufficiently low rate, by a specified year, to achieve the climate-stabilizing requirement, for the developed world, with an acceptably-high probability. Implementation would therefore support stabilizing the climate at a livable level.</p> <p>Our Committee believes that this is an urgent matter that deserves just as much attention today as the air pollution crisis that CARB fought beginning in the 1970's.</p>	This comment is outside the scope of the SCS Program and Evaluation Guidelines.

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43	Sherman Lewis	Outside SB 375	<p>In the time I had, I could not find any reference to</p> <ul style="list-style-type: none"> -how TCAC guidelines subsidize parking structure and incentivize global warming, subsidize parking in general, and fail to incentive non-auto modes. -how ARB GHG estimates of GHG for AHSC application consider lower emissions from higher densities and need reform to reflect how they in practice lower GHG more than the caps allow, and to adjust estimates based on real neighborhoods. -enough policy on cash-out, eco-pass, unbundling, market parking charges, smart meters land-based shuttles, corridor and center densification, and the correlation between non-auto modes and densities over 50 persons per neighborhood acre in neighborhoods defined by walking distance. -any mention of job-housing imbalance and how severe job surpluses in downtown SF and Silicon Valley benefit those localities at the expense of severe congestion and slow commutes, soaring housing prices, and housing surplus localities. -the need to reform economic accounting to reflect external costs and restructure prices accordingly 	This comment is outside the scope of the SCS Program and Evaluation Guidelines.