

April 28, 2020

Ms. Sarah Jepson
Planning Director
Southern California Association of Governments
900 Wilshire Blvd., Suite 1700
Los Angeles, California 90017

RE: CARB follow-up comments on SCAG's Proposed Final 2020 RTP/SCS

Dear Ms. Jepson:

California Air Resources Board (CARB) staff appreciate the opportunity to review and engage with the Southern California Association of Governments (SCAG) staff on the update to its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) known as "Connect SoCal." In meetings held in the fall of 2019 and the winter of 2020, as well as in a January 24 comment letter on SCAG's draft 2020 RTP/SCS, CARB staff raised concerns that SCAG's 2020 draft RTP/SCS is missing information that CARB needs to conduct its greenhouse gas (GHG) evaluation under SB 375. The Proposed Final Connect SoCal Plan (Plan) was released on March 27, 2020, and the purpose of this letter is to highlight concerns CARB continues to have with the Plan.

The Plan does not include the information needed for CARB to determine whether or not all of SCAG's included strategies are reasonable. SCAG's recent edits to the Plan partially address our previous comments, however, CARB staff have identified the remaining information needed from SCAG for CARB's evaluation, and have organized these items below to correspond to the Policy Commitments (Determination Component) in CARB's Final Guidelines¹, on which our evaluation of acceptance or rejection of the SCS will be based.

¹ CARB's *Final Sustainable Communities Strategy Program and Evaluation Guidelines (pages 38-44)* at: <https://ww2.arb.ca.gov/sites/default/files/2019-11/Final%20SCS%20Program%20and%20Evaluation%20Guidelines%20Report.pdf>

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Trend Analysis

Performance reporting for the years 2020 and 2035. SCAG's Plan shows the performance trends of GHG, VMT, mode share, and alternative travel time modes are heading in the right direction by the year 2045. However, to evaluate whether or not the Plan meets the 2020 and 2035 targets, CARB needs all eight VMT performance indicators and for at least the year 2035. The eight performance indicators include household vehicle ownership, mode split, travel time by mode, average vehicle trip length, transit ridership, seat utilization, household VMT per capita, and GHG per capita. The trend analysis evaluates whether the data and performance indicators provided by the MPO indicates the SCS is moving in a direction consistent with the planned outcomes from the RTP/SCS². Without this information, CARB cannot determine whether SCAG's Plan will meet the targets. As indicated in the Guidelines, CARB will be looking for these data in the SCS as part of its trend analysis.

SCAG's Plan also includes additional summary information regarding induced demand. As indicated in the Guidelines, CARB expects to receive the calculation files used for SCAG's induced demand analysis.

Policy Analysis

Information about the measurable commitments, investments, and other policies SCAG and its local members are making to take action on the strategies in the SCS, especially for pricing and land use strategies³. CARB staff continues to have significant questions regarding the extent to which the pricing strategies (e.g., congestion pricing, mileage-based user fees, and TNC user fees) laid out in the Plan will in fact be implemented. For example, the TNC user fee is projected to be in place by 2021 (Transportation Finance Technical Report, page 13), and SCAG has not provided any evidence of actions leading to implementation by 2021. These pricing strategies require State enabling actions and local support. Further, it seems unrealistic that both the congestion pricing and mileage-based user fee strategies would occur at the same time in the year 2030 (Transportation Finance Technical Report, page 13). To evaluate whether

² CARB's *Final Sustainable Communities Strategy Program and Evaluation Guidelines* (page 39) at: <https://ww2.arb.ca.gov/sites/default/files/2019-11/Final%20SCS%20Program%20and%20Evaluation%20Guidelines%20Report.pdf>

³ CARB's *Final Sustainable Communities Strategy Program and Evaluation Guidelines* (pages 40-42) at: <https://ww2.arb.ca.gov/sites/default/files/2019-11/Final%20SCS%20Program%20and%20Evaluation%20Guidelines%20Report.pdf>

or not the strategies are reasonably likely to be implemented, it is important that we have information regarding the specific actions SCAG will undertake to implement these strategies. These actions could include, for example, the specific investments that will be made; if studies have been conducted, the next steps that SCAG and locals are moving forward on; and what SCAG and member agencies are doing to advance needed congressional, legislative, and local actions. CARB staff will need SCAG to provide clear information about these actions before they can be considered for GHG emission reduction credits toward target achievement. In addition, CARB requests that SCAG conduct and provide scenario testing that shows the overall impact of the pricing strategies included in the Plan.

Similarly, SCAG's Plan does not include specific information on what actions, investment or other things the region is committing to in order to support its included land use development pattern and strategies. For example, SCAG could describe what discretionary funds are being used to foster local actions to increase development in the right places. The multi-modal dedicated lane strategy is another example where we need additional information to assess the likelihood that the strategy will be implemented. SCAG staff have stated that this is reflected in the project list as expanded bus service. However, the completion year for this project is 2045. SCAG should provide further information on how these strategies and corresponding projects will be in place to meet the 2020 and 2035 target years. Overall, CARB is seeking evidence that land use and transportation strategies will be supported and implemented by local jurisdictions within the region and information on what SCAG is doing to enable implementation of the strategies in the Plan.

Finally, SCAG's Plan now includes a summary table of 2035 GHG reduction calculations that provides some information on the relative contribution of its strategies to the achievement of the targets. CARB staff need SCAG to provide a more detailed breakdown of this table, with line items for each off-modeled strategy, information for the 2020 target year, as well as further documentation of the input assumptions used for each of the strategies that were quantified via the travel demand model. This is necessary to understand whether the magnitude of GHG emissions reductions being claimed for each strategy is reasonable.

Investment Analysis⁴

Information about how revenue gaps will be filled if SCAG is not able to take action on pricing strategies. SCAG's Plan has a revenue gap of \$139.4 billion to fund projects in the RTP/SCS, which is about 22 percent of its current revenue (Transportation Finance Technical Report, page 13). SCAG has included several strategies, including pricing strategies, to assist with filling this shortfall. CARB is concerned that if the region is not able to take action on the pricing strategies, other strategies and investments that contribute to the SCS meeting its target may be at risk. SCAG should explain what categories of investments and what strategies or projects these pricing strategies are expected to fund. CARB is concerned that if SCAG is not able to fill the revenue gap through various pricing strategies, target achievement may not be possible.

Plan Adjustment

Data and reporting of implementation of all previous 2016 RTP/SCS strategies and explanation of what adjustments SCAG made to get the region on track to meet its 2020 target⁵. Based on the SB 150 report⁶, the State is not on track to meet our SB 375 targets. Furthermore, SCAG's transit ridership, one key measure of SCS implementation success, is decreasing and heading in the wrong direction. This is consistent with data presented in the RTP/SCS Transit Technical Report.⁷ The Plan does not include information about what SCAG is doing to address these trends within the region. This information is essential for CARB to conduct its Plan Adjustment analysis in the evaluation, which assesses whether a region is on track to meet its targets, and if not, whether it made appropriate changes to the SCS that will get it back on track to meet its 2035 target. SCAG should explain which previous strategies have or have not been implemented, and why. Furthermore, SCAG needs to explain what changes they are making in this plan compared to its previous plan to meet the targets (e.g., what actions, investments, or strategies are different). Additionally, CARB continues to request SCAG provide regionally specific data to substantiate the significant GHG and VMT reductions SCAG is assuming will occur from telemedicine and e-commerce in the 2020 RTP/SCS.

⁴ CARB's *Final Sustainable Communities Strategy Program and Evaluation Guidelines (pages 42-43)* at: <https://ww2.arb.ca.gov/sites/default/files/2019-11/Final%20SCS%20Program%20and%20Evaluation%20Guidelines%20Report.pdf>

⁵ CARB's *Final Sustainable Communities Strategy Program and Evaluation Guidelines (pages 43-44)* at: <https://ww2.arb.ca.gov/sites/default/files/2019-11/Final%20SCS%20Program%20and%20Evaluation%20Guidelines%20Report.pdf>

⁶ CARB's *2018 Progress Report: California's Sustainable Communities and Climate Protection Act* at: <https://ww2.arb.ca.gov/resources/documents/tracking-progress>

⁷ SCAG's *Proposal Final Connect SoCal Plan Transit Technical Report* at: https://www.connectsocial.org/Documents/Proposed/pfConnectSoCal_Transit.pdf

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Next Steps

CARB staff are committed to working with SCAG staff on potential approaches to address these issues and remedy aspects of SCAG's technical methodology for estimating GHG emissions. Without the information identified in this letter, as well as our previous one dated January 24, 2020, CARB staff is concerned that the Plan may not meet the targets. For transparency purposes, CARB requests that SCAG publicly post all information it submits to CARB for evaluation with its SCS materials. Lastly, note that the 60-day review timeline begins once we have a complete submittal.

We look forward to continuing our collaboration with SCAG. If you have any questions, please contact me at Jennifer.Gress@arb.ca.gov, or my staff, Nicole Dolney, at Nicole.Dolney@arb.ca.gov.

Sincerely,

/s/

Jennifer Gress, Ph.D.
Division Chief
Sustainable Transportation and Communities Division

cc: Nicole Dolney
Branch Chief
Transportation Planning Branch