

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

Topic(s)	Comment	Response	Text Change (N/Y, page #)
Tracking Implementation	<p>Make a clear distinction between SB 375 and SB 150 requirements within the Guidelines. [CALCOG]</p> <p>Combining progress tracking required by SB 150 in the SCS Evaluation Guidelines, CARB will provide a misleading impression that MPOs are the sole entities responsible for all the mismatch of on-the-ground data (which points to SCS implementation) and the target trajectory. [FCOG]</p> <p>We encourage CARB to separate SB 150 progress tracking from the SCS evaluation process, and provide clear language acknowledging the pivotal role that local agencies and the State play in plan implementation. [FCOG]</p> <p>The Tracking Implementation (Reporting Element) section of the guidelines seems to assume that reviewing progress toward achieving the SB 375 targets and SCS implementation are the same. They are not. SB 150 directs CARB to report on the progress MPOs have made on meeting their targets. In this regard SB 150 contemplates a review and report of what has already transpired within a region vis-a-vis the target. SCS implementation by an MPO, on the other hand, is a present-time forward-looking undertaking that because of the nature of transportation and land use decisions develops and materializes over time. [CBIA]</p> <p>First Bullet, Tracking Implementation, page 23. SB 150 Report -The Guidelines should clarify whether the SB 150 report will be used to track implementation (Statewide, every 4 years on September 1st) or separate reporting will be done by MPO with each SCS determination (MPO focused, every 4 years when RTP/SCS is approved). [CALCOG]</p>	<p>The language in the report further clarifies why staff are including the Tracking Implementation element in the draft guidelines, and the distinctions between the SB 150 report and the Tracking Implementation portion of the evaluation guidelines. CARB staff will not use Tracking Implementation for the SCS determination, but it will be a reporting element.</p> <p>As indicated in the draft guidelines, the new Tracking Implementation component of the Guidelines, which will be used for reporting purposes, will "report on the progress of SCS strategy implementation and document progress that a region has made towards meeting the SB 375 GHG emission reduction targets." Further language has been added to the Draft Guidelines to explain that the focus of the SB 150 progress report is to evaluate regional progress using a common set of metrics across all MPOs, while the SB 375 Tracking Implementation component will include additional indicators for each MPO that are specific to that MPOs RTP/SCS strategies, key actions, and implementing entities. The purpose of this review is to "assure future success, CARB staff will start reporting in each SCS Evaluation Staff Report whether the strategies an MPO includes in the RTP/SCS are being implemented and will evaluate performance to date using data-supported metrics similar to those published in the 2018 progress report." (Page 36).</p> <p>CARB understands that multiple organizations are responsible for the implementation of RTPs/SCSs. The review serves to understand the progress regions have made towards meeting their targets, and how well strategies are working (page 25). While the actions that MPOs take can contribute to progress within regions, other factors and the actions of many other agencies including state and local governments have influence as well. Understanding of these important roles are also discussed in CARB's 2017 Scoping Plan Update, CARB's SB 150 Sustainable Communities Progress Report, and CARB's Updated Final Staff Report on the Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets.</p>	<p>Yes 9-10, 36-37</p>
Tracking Implementation	<p>We believe it important for CARB to clearly articulate the statutory basis supporting its new SCS incremental "level of implementation" authority.</p> <p>To guide its implementation analysis CARB proposes that two questions be posed:</p> <ol style="list-style-type: none">1. Is the region meeting or on track to meet its RTP/SCS performance benchmarks?2. Are key regional metrics tracking with the expectations set out in the previous SCS? <p>Focusing too sharply on short-term outcomes and metrics and applying the proposed Elasticity Analysis (see below) could, we fear, subject individual transportation and housing projects to constantly changing criteria and could lead to significant disruptions to the planning process ... the opposite of the certainty needed to achieve the GHG reduction goals.</p> <p>Just because implementation may be lagging at any given moment in time should not automatically raise the specter that the targets are not being met. Likewise, if key metrics or assumptions (such as population growth, job growth, housing production, transit ridership, etc.) are not keeping pace with expectations the established four-year RTP/SCS update allows for a stable and predictable process to make adjustments.</p> <p>We suggest the following modifications to the questions recommended in the proposed language.</p> <ol style="list-style-type: none">1. Is the RTP/SCS performance on track to meet the applicable SB 375 target benchmarks?	<p>CARB staff have proposed tracking implementation based on the direction provided by the Board during the 2018 GHG emission reduction target update process.^{1,2,3}</p> <p>The questions proposed in this comment place further emphasis on the planning process, which is addressed as part of the plan adjustment analysis in the Policy Commitments element, where staff assess an MPO's GHG determination. The Tracking Implementation element will not be used for the determination.</p>	<p>No</p>

¹ Resolution 18-12. *Proposed Update to Senate Bill 375 Greenhouse Gas Emissions Reduction Targets*. March 2018. Available at: <https://www.arb.ca.gov/cc/sb375/finalres18-12.pdf>.

² California Air Resources Board. *Updated Final Staff Report: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets*. February 2018. Available at: https://www.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.pdf.

³ J&K Court Reporting. *Meeting of California Air Resources Board: Thursday, March 22, 2018*. March, 2018. Available at: https://www.arb.ca.gov/board/mt/2018/mt032218.pdf?_ga=2.243746631.330498114.1544123257-322284002.1543529202.

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	2. Are key regional metrics tracking with the emissions reductions necessary to meet the applicable SB 375 target? [CBIA]		
Tracking Implementation	Each reference to the Tracking Implementation (SB 150 Reporting) Element should be titled in the same manner. <ul style="list-style-type: none"> • Page 6, first paragraph, last sentence • Page 20, third bullet • Page 23, first, bullet • Page 30, title of first box [CALCOG] 	Text has been revised, as appropriate.	Yes 6, 8-10, 19, 22, 25, 28, 36, 52
Tracking Implementation	Figure 1, first box, Tracking Implementation, page 6. Please update the text to read, " <i>Report on the progress regions have made towards meeting their SB 375 GHG reduction targets (SB 150 Reporting).</i> " This ensures consistency with other references throughout the document. [CALCOG]	Text has been revised, as appropriate.	Yes 9
Tracking Implementation	Second to last full paragraph, first sentence, page 23. Please update the text to read, " <i>CARB has enhanced the SCS program, and evaluation framework to include a new component to track implementation (SB 150 Reporting).</i> " [CALCOG]	Text has been revised, as appropriate.	Yes 25
Tracking Implementation	Tracking Implementation Table, Page 30. It is unclear whether the Tracking Implementation (Reporting Element) box on page 30 refers to the SCS or the SB 150 report. Assuming a consistent naming convention throughout the Guidelines, please update the title of the Tracking Implementation (Reporting Element) box to Tracking Implementation -SB 150 Reporting (Reporting Element). [CALCOG]	Text has been revised, as appropriate.	Yes 35
Policy Commitments	<p>CARB recognizes that the key to meeting our climate and air quality goals in the transportation sector will require the deployment of advanced technologies and clean fuels, and the reduction in growth of VMT. The 2017 Scoping Plan affirms the need for reductions in vehicles miles traveled, as does the recent SB 150 Sustainable Communities Progress Report.</p> <p>SB 375 provides regions flexibility in how plans meet respective targets, but does not allow MPOs to take credit for State programs that improve fuel efficiency, reduce the carbon content of fuels or other state measures that will reduce greenhouse gas emissions to demonstrate achievement of their target.</p> <p>What is CARB looking for in an SCS, Policy Commitments (Determination Element), page 23? There is concern CARB is not taking enough account of electric and zero emission vehicle implementation. Resources that could be spent on fast-to-implement strategies like workplace electric vehicle charging stations and RNG fueling infrastructure may be allocated to less efficient strategies, and other strategies-like land use change (where it often takes years or decades to realize across-the board reductions, as the SB 150 report demonstrates) are less likely to provide early reductions in gasoline consumption. Vehicle technology improvements will have a greater immediate effect of quickly and efficiently reducing GHG emissions (and have the co-benefit of reducing criteria pollutants faster). [CALCOG]</p>	<p>CARB staff have updated this section of the Draft Guidelines to emphasize the importance of incorporating both short- and long-term strategies into the SCS. Language has been added to the draft guidelines as follows "As the objective of SB 375 is to reduce GHG emissions through better alignment of land use and transportation planning, the SCS Evaluation Process places emphasis on these SB 375 planning goals. Land use and transportation strategies pose the greatest opportunities to maximize GHG emission reductions, but some of these also require more time to realize those benefits. As such, the SCS Evaluation Process takes a comprehensive and holistic approach to evaluation strategies that are both long-term (such as land use and behavioral changes) and short-term (such as technologies and funding)".</p>	Yes 26
Policy Commitments	Incorporate operating and fare reduction programs into the Investment Analysis, adding the underscored language on pp. 37-8: "The Investment Analysis evaluates whether SCS investments support the region's expected GHG emissions reductions. CARB staff will evaluate and compare the expenditures in this plan and the previous plan, looking for evidence of whether the planned investments support the stated GHG reductions and whether the MPOs are shifting their investment priorities consistent with SCS strategies. <u>This analysis looks at both capital and operating investments, making use of the transportation project list, the investments in transit operations, and the programs and investments to reduce transit fares (including both fixed-route and demand-responsive transit) (see p. 28) submitted by each MPO to assess the likelihood that modeled projections of transit ridership and VMT reduction will come to pass.</u> " [NGO]	CARB staff have updated the text, as appropriate.	Yes 45
Policy Commitments	CARB should consider and balance findings of all five analyses before accepting or rejecting an MPO's determination, as the draft Guidelines indicate that if there is insufficient evidence to explain or overcome a	Staff have included additional language to clarify how the results of the Policy Commitments Analysis will be used to make a determination. CARB will use the entire body of evidence presented in the data, and results	Yes

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	<p>deficiency in any of "the assessments," ARB may reject an MPO's determination that GHG targets will be met. This could result in a situation where CARB may find that four of five analyses strongly support the MPO's determination, but one does not, potentially leading to an unjustified rejection of the MPO's determination. [CALCOG]</p> <p>It is still difficult to imagine exactly how these guidelines will be applied in determining whether GHG reduction targets have been demonstrably met. Despite pages of material outlining the criteria to be used, still missing is a discussion about the types or degrees of deviation in a particular SCS that would warrant failure to meet the targets in CARB's eyes. Without this clarity, Fresno COG finds that we are apprehensive regarding the various criteria, especially as several make reference to trends and strategies that would not be appropriate to the Fresno region (see below). In the end, as the length of the SCS evaluation guidelines continues to grow, the determination process still seems ultimately subjective. [FCOG]</p>	from the five analyses to support our determination. Failure of a single test does not mean automatic failure of the target, rather it will inform the need for additional information and clarification to resolve any potential issues identified.	10, 19, 37-38, 53
Policy Commitments	Table 1, on p. 26, under "Housing and Employment (land use)," the example strategy is "Infill development, increased multi-family and/or small lot development, increased densities for residential and commercial development, transit-oriented development, increased jobs/housing balance/fit, etc.," and the example actions are "MPO funds allocated to update local plans and zoning to increase density in targeted areas." The listed example is one step removed from actually reducing GHG emissions, and should be replaced with <u>"conditioning of transportation funds on local production and preservation of affordable housing near jobs or transit; community-serving infrastructure investment in existing, underserved rural communities; and requiring inclusionary housing to support jobs-housing fit."</u> [NGO]	CARB staff have updated the table to provide more clarity regarding Key Action Examples.	Yes 29
Incremental progress	<p>Develop Consensus for Incremental Progress. The four largest MPOs seek to work with CARB to develop a mutually agreeable way to report what strategies have changed-and constraints have emerged-since the adoption of the preceding RTP/SCS.[CALCOG]</p> <p>Although the Guidelines propose that MPOs may voluntarily conduct the Incremental Progress Analysis; they omit the flexibility or a way to account for regional differences. As a result, the methodology in the Incremental Progress Analysis should be improved. [CALCOG]</p>	<p>As indicated in the draft guidelines, additional direction was provided by the Board in the March 2018 Board Meeting and Resolution 18-12 to include Tracking Implementation, Incremental Progress, and Equity reporting components and to move from a modeling-focused SCS evaluation process to a more strategy-based approach. The Incremental Progress component will serve to inform the public on the plan level changes that the regions have made between RTPs/SCSs.</p> <p>When CARB initiated the update to the Guidelines, multiple public workshops were held throughout the State and via webcast to provide the initial concepts, evaluation framework that would be included in the update and solicit feedback from stakeholders. CARB has neither received alternative approaches nor methodologies to change the proposed approach. As indicated in the draft guidelines, SCS Program and Evaluation Guidelines will be revisited and revised, as appropriate, with stakeholders input over time as new information and data becomes available.</p> <p>Further, CARB staff understand that the methodology to quantify the Incremental Progress may vary for each MPO depending upon the tools available and other factors influencing regional differences. Hence, CARB staff are willing to work with respective MPOs in conducting the Incremental progress analysis as appropriately for their respective region.</p>	No
Incremental progress	<p>We concur that it is appropriate to highlight new or enhanced strategies adopted in the pursuit of meeting SB 375 goals, but the required Incremental Progress reporting is beyond the scope of SB 375 and the March 2018 CARB Board action. The 14 MPOs request the section omit reference to the eight San Joaquin Valley and "Small Six" MPOs. [CALCOG]</p> <p>The Incremental Progress Assessment was initiated and agreed upon between the Four Big MPOs and the CARB during the 2018 target -setting process because of the unique situation among the Four Big MPOs. The eight San Joaquin Valley MPOs were not part of the discussion and should be kept out of the Incremental Progress Assessment. [FCOG]</p>	<p>As directed by the CARB Board in its Resolution 18-12, approved on March 22, 2018, the Incremental Progress reporting component has been added to the revised draft guidelines.</p> <p>Text has been added to the draft guidelines to further clarify the Incremental Progress reporting is applicable to the Big 4 and 8 San Joaquin Valley MPOs based on <i>Updated Final Staff Report: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets. APPENDIX A. MPO Target Recommendations and CARB Staff Recommendations.</i></p> <p>Note the language cited by the commenter from the December 2017 CARB Board Meeting, "Staff does not propose any revisions to the October proposal for the 8 San Joaquin Valley MPOs nor for the 6-small</p>	Yes 11, 49

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		remaining MPOs." is actually referencing the revised targets for the Big 4 MPOs (see lines 6 through 8, page 13, of J&K Court Reporting, Dec 2017 https://www.arb.ca.gov/board/mt/2017/mt121417.pdf). Further, lines 23 through 25 on page 13 of J&K Court Reporting, Dec 2017 indicate an expectation of the other 14 MPOS to include "additional reporting in their next planning cycle", and the updates contained in the revised Guidelines include these additional reporting requirements referenced in the CARB Board meeting and discussed in CARB Board Resolution 18-12.	
Incremental Progress	<p>Implementing an incremental progress analysis seems to pivot on the ability to separate and quantify the effects that exogenous variables have on GHG emission results. As MPOs access new data and improve modeling tools and practices, it becomes exponentially more difficult to track and quantify (to the degree CARB desires) the exact contribution such variables have on the final GHG emission result. Such a level of analysis would be outside the capability of smaller MPOs, whose staff is already struggling to meet its requirements in its RTP/SCS development.</p> <p>The performance indicator analysis referenced in the alternative assessment proposition is more in line with the level of analysis that would be appropriate and sufficient for most MPOs in this regard.</p> <p>The methodology that CARB proposes to conduct the Increment Progress Assessment is both cumbersome and labor intensive. It is not likely to produce reasonable results as directly as CARB expects, which could ultimately make CARB's decision regarding the SCS questionable. SB 375 is an unfunded mandate. Every four years, MPOs invest millions of dollars and huge staff resources in developing an SCS that will meet the GHG reduction targets. CARB's proposed Increment Progress Assessment methodology is demanding extra months of model testing when MPO staffing is already stretched very thinly. [FCOG]</p>	<p>CARB staff recognize modeling approach will not always work for every MPO because of the continuing need to update modeling platforms and forecasts and hence alternative method has been proposed in the draft guidelines.</p> <p>CARB recognizes the potential for MPO capabilities and staff resources to preclude the ability of MPOs to provide sufficient data or analyses outlined in the draft guidelines. Consequently, the draft guidelines has been amended for clarification purposes to indicate that CARB staff will conduct an alternative assessment in the event an MPO does not have the resources to conduct the analysis.</p>	Yes 30, 50
Incremental Progress	<p>Add the underscored language on p. 28: “MPOs should also submit the following information: ... <u>A table enumerating each of the MPO’s adopted key strategies and commitments (including the strategies, key actions, and investments committed by the MPOs in their RTP/SCSs), with citations to where each can be found in the adopted RTP/SCS, and how each compares to any related strategies or commitments in the prior RTP/SCS.</u>”</p> <p>Rationale: Compiling in one place all of the relevant strategies and commitments is essential to ARB’s completion of the Policy Analysis and Investment Analysis, and also critical to assessing Incremental Progress (see p. 38). It will also allow stakeholders and participants in the regional planning process a transparent look at what the MPO is putting forward for ARB’s review, and set the stage for their engagement in ARB’s review process. [NGO]</p>	<p>The information requested as part of the comment will naturally develop through the process outlined in the SCS Program and Evaluation Guidelines through data provided by MPOs, conversations and coordination between MPOs and CARB, and the SCS review process. However, it’s a good practice to provide this information during MPOs public process in an easy to access format, such as the one described.</p>	No
Incremental Progress	<p>Modify on p. 30: “Report on whether an MPO’s proposed SCS has more or improved strategies <u>or commitments</u> than the currently adopted SCS: <u>whether any strategies or commitments in the current SCS have been dropped or reduced in scope; and whether the strategies are supported by actions both in terms of policy and investment changes.</u> Is this SCS achieving greater reductions due to strategies compared to the last SCS, and consistent with information the MPO shared during the 2018 target setting process?”</p> <p>Rationale: As CARB compares the new RTP/SCS with the prior one to look “for evidence that there are supportive key actions for incremental progress of SCS strategies both in terms of policy and investment changes” (p. 42), it will be essential to look at both broad strategies and specific commitments (policies, actions or investments). It will also be essential to identify changes in those commitments from the prior to the new plan. [NGO]</p>	<p>CARB is asking MPOs whether the current SCS improves upon the previous SCS. This is already captured under the Investment analysis and the Policy Analysis within the Policy Commitment component of the SCS Evaluation. Further this is analyzed under the Incremental Progress component.</p>	No
Incremental Progress	As TNCs have been reluctant to share this data, it is difficult for MPOs to ascertain the share of TNC trips -- single and pooled --as listed in the table of independent exogenous variables. Until such time as this data is	Text has been revised, as appropriate.	Yes 46

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	required to be consistently shared on an ongoing basis, Table 4 and 6 should be updated with the phrase, "where available and sufficient for forecasting purposes". [CALCOG]		
Equity	<p>MPOs already address equity, consistent with Title VI of the Civil Rights Act. Executive Order 12898, and the contracted agreements that all MPOs have entered into with Federal Department of Transportation agencies. Refer to Attachment 1 of this letter, each of our respective RTP/SCSs and Public Participation Plans, and Appendix L of the California Transportation Commission's 2017 RTP Guidelines. [CALCOG]</p> <p>We are disappointed to see equity added to the ever-lengthening list of SCS evaluation guidelines, for the following reasons: Equity concerns and regulations are already well established in State and Federal regulations. MPOs have conducted comprehensive equity (environmental justice) analysis in the RTP/SCS to ensure that projects in the plan do not impose disproportionately adverse impacts on low-income and minority populations. Such analyses are well documented in the RTP/SCS. Because equity has its local context, every region has a unique process for engaging low-income and minority populations during their RTP/SCS development. Such engagement efforts have been demonstrated throughout the entire RTP/SCS planning process. [FCOG]</p> <p>Although social equality efforts have been a well-documented practice in the RTP/SCS process, social equality remains an issue outside of SB 375. It is inappropriate for CARB to overreach its designated power within SB 375 and include a non-authorized issue such as social equality as part of the SCS review. [FCOG]</p>	<p>As indicated in the draft guidelines, the CARB Board directed in its Resolution 18-12, approved on March 22, 2018, that an equity-reporting component be included in the revised Guidelines. The draft guidelines explain, "...several federal and state legal requirements [footnote] work to protect low-income and minority populations. The environmental justice and equity analysis requirements found in the RTP Guidelines are based on these requirements." (Page 12).</p> <p>The footnote lists these requirements as "Title 23 CFR Part 450.316(a); Title 42 U.S.C. Chapter 21 Section 2000(d) (Title VI of the federal Civil Rights Act of 1964); Title 49 CFR Part 21 (Title VI Regulations); portions of FTA Circular 4702.1B – Title VI Requirements and Guidelines for FTA Recipients; Presidential Executive Order 12898 on Environmental Justice (1994); portions of U.S. DOT Order 5610.2(a) (2012) and Federal Highway Administration Order 6640.23A (2012); California Government Code Section 11135."</p> <p>The draft guidelines further state that "[c]onsistent with Board direction, Equity is a new reporting component of the SCS Evaluation Staff Report. This direction aligns with existing legislative priorities to promote equity as an important state planning goal and with federal requirements for equity considerations. Currently, the CTC's 2017 <i>Regional Transportation Plan Guidelines for Metropolitan Planning Organizations</i> provide guidance for MPOs to conduct a required equity analysis. Addressing equity ensures the programs, policies, and activities associated with regional transportation improvements identified in the RTP/SCS do not have a disproportionately high and adverse impact on low income or minority populations. The goal of CARB's SCS Evaluation Process is to report the type of qualitative and quantitative equity analyses currently conducted by MPOs." (Page 51).</p>	Yes 12, 51
Equity	<p>Suggested Change #1B: P. 42 (under the heading "Equity"), add: <u>"In addition to meeting the requirements for conducting an equity analysis of the RTP/SCS, MPOs should provide CARB with an assessment of the extent to which any of its key strategy commitments will meet the needs of low-income communities/communities of color and of low-income populations/ populations of color, including the timeliness with which those needs will be met. This assessment should include a summary of the needs identified within the MPO's public process by those communities and populations as priorities, and should also assess the extent to which any key strategy commitments may harm those communities or populations, through displacement, exposure to health risks, or otherwise."</u> [NGO]</p> <p>Ensure that all significant strategies and commitments are adequately analyzed in the Equity Analysis, specifically with regard to whether and how well they are meeting important community needs of underserved communities.</p> <p>Rationale: The draft's proposal to assess equity is generally limited to reporting on "whether MPOs are conducting equity analysis [sic] of their SCS, as well as the type of qualitative and quantitative equity analysis conducted by MPOs." (p. 43.) This pro forma review is inadequate to address staff's commitment to the Board "to fully evaluate the social equity impacts of the SCSs." (Board tr. of 3/22/18, p. 43.) A "full evaluation" of the social equity impacts of the SCS must look not only at the MPO's equity analysis of the RTP/SCS as a whole (often produced via black-box computer modeling based on incomplete metrics of equity), but also at the equity impact of the specific strategy commitments that will now be the focus of CARB's review.</p> <p>The California Transportation Commission's RTP Guidelines shed useful light on how an equity analysis of those strategy commitments should be undertaken, highlighting CARB's GGRF Funding Guidelines as a "planning practice relevant to the [equity analysis] requirements described in Chapter 4." (CTC RTP</p>	<p>CARB has updated the Draft Guidelines to indicate the Equity reporting component is consistent with CARB Board Resolution 18-12 (page 12). CARB is proposing to report on the efforts undertaken by the MPO to meet federal and state requirements related to equity.</p> <p>The Equity reporting component does not include any additional requirements beyond those required by state and federal transportation planning requirements, and CARB will report any additional equity components and analyses above and beyond those MPOs are required to report if conducted by the MPOs.</p> <p>Regarding AB 686, which specifies, "public agencies shall administer its programs and activities relating to housing and community development in a manner to affirmatively further fair housing, and take no action that is materially inconsistent with its obligation to affirmatively further fair housing." (8899.50 (b). CARB's role under SB 375 is to determine whether the SCSs, if implemented, would achieve their assigned targets for GHG reduction from automobiles and light duty trucks. The draft guidelines notes its intent is to "help MPO's develop their SCSs and to provide consistency in which CARB Staff prepare the SCS Evaluations...[and] CARB staff will use these guidelines to strive for effective, streamlined, and consistent evaluations that will best serve the requirements and intent of SB 375." CARB's role under SB 375 does not appear to include oversight or directives related to housing nor community development as anticipated by AB 686.</p>	No

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	<p>Guidelines, p. 318.) As CTC notes, the GGRF Guidelines: ...define the benefit a GGRF investment must provide under SB 535 as “a benefit that meaningfully addresses an important community need” in a disadvantaged community. ARB’s definition of “benefit” is also directly relevant to the crafting of an equity and EJ analysis of the RTP, as discussed in the next section. In addition, ARB’s Funding Guidelines require that “projects be designed to avoid substantial burdens, such as physical or economic displacement of low-income disadvantaged community residents and businesses or increased exposure to toxics or other health risks. (RTP Guidelines, pp. 319-320)</p> <p>Timeliness is a crucial factor in this assessment of the extent to which strategy commitments in the SCS meet the needs of underserved communities and populations: Federal law requires MPOs to ensure against any “significant delay in the receipt of benefits by minority or low-income populations.” (CTC RTP Guidelines, p. 77.)</p> <p>In addition to addressing the Board’s direction, this more robust assessment of equity will also ensure that ARB’s review of RTP/SCSs for compliance with SB 375 complies with ARB’s obligations under AB 686 (Santiago) to affirmatively further fair housing (as broadly defined in Gov. Code section 8899.50. See CTC RTP Guidelines, pp. 320-21 (discussing the “affirmatively furthering fair housing” requiring in federal law, now incorporated into California law by AB 686). [NGO]</p>		
Equity	<p>Make revisions to recognize the importance of financial incentives that promote the production of housing affordable to high-propensity transit riders. E.g., on p. 36 (describing the analysis of “Land Use and Housing Policy” within the Policy Analysis) add and strike the following language: “CARB staff will qualitatively evaluate the relationship between the SCS and relevant MPO land use and housing <u>commitments activities and actions</u>. For example, actions such as <u>conditioning regional funds to local government on the production of affordable transit-oriented housing incentivizing transit-oriented development</u> support the SCS’s housing strategies. On the other hand, an SCS that plans for a certain amount of infill development but does not support that strategy with actions or commitments <u>not reflecting approved large development projects or annexed new growth that were not envisioned or analyzed in the prior SCS</u> suggests to CARB that the SCS may be at risk of not meeting its targets unless plan adjustments are made.” [NGO]</p> <p>Rationale: The displacement of lower-income, high-propensity transit riders from transit-oriented places is a key impediment both to achieving mandated GHG reduction targets and to achieving social equity. A key, proven strategy to combat such displacement is conditioning discretionary transportation funds on local action to produce and preserve affordable housing, and/or to protect existing lower-income residents from eviction. CARB’s review of MPO plans should expressly focus on strategy commitments that tie funding to local actions that “produce, preserve and protect.” [NGO]</p>	CARB staff have updated the text, as appropriate.	Yes 43-44
Strategy-based Evaluation Process	<p>The equity component to pricing strategies on Table 1, SCS Strategy and Key Action Examples, page 26, have the potential to have complex and significant equity considerations. [CALCOG]</p>	<p>Comment noted. 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 " (page 28)". MPOs select strategies for the region in creating an RTP/SCS and assess the equity implications of those choices within that regional context as described in the RTP Guidelines.</p>	No
Strategy-based Evaluation Process	<p>First bullet under <i>"The MPOs should also submit the following information:"</i>, page 28. Please update the language in the first bullet to read, <i>"MPO 's adopted land use allocation forecasted development pattern (total new population growth, housing growth, and employment growth) <u>mapped</u> or tabulated by place type or sub-regional geography as appropriate to each region."</i></p> <p>Land use allocation is a term synonymous with local general plans. The term forecasted development pattern</p>	<p>Text has been revised, as appropriate.</p>	Yes 31-34, 43, 55

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	is synonymous with RTP/SCSs and recognizes that local jurisdictions retain land use authority under the California Constitution. [CALCOG]		
Strategy-based Evaluation Process	Fist sentence, page 29. Please update the text to read, " <i>For the land-use allocation forecasted development pattern ...</i> " [CALCOG]	Text has been revised, as appropriate.	Yes 31-34, 43, 55
Strategy-based Evaluation Process	Last sentence before Tracking Implementation (SB 150 Reporting) section, page 31. Please update the text to read, " <i>The transportation project list and land-use allocation-forecasted development pattern ...</i> " [CALCOG]	Text has been revised, as appropriate.	Yes 31-34, 43, 55
Strategy-based Evaluation Process	On p. 28: "MPO's adopted transportation project <u>and program investment</u> list, including project costs, funding source (if known/available)" [NGO]	Text has been revised, as appropriate.	Yes 32
Strategy-based Evaluation Process	In table 1, on p. 26, under Public Transit and Active Transportation, the example strategy is "Increased transit operations and efficiency, bike and pedestrian infrastructure, bikeshare systems, complete streets policies, etc.," and the example actions are "Electronic fare payment system recognized across mobility providers." The action is a mismatch unrelated to "increase transit operations," and should be replaced with " <u>increase transit operating funding; fund free or reduced-cost transit to increase ridership.</u> " [NGO]	CARB staff have updated Table 2 to reflect the proposed examples" under the " <i>Strategy Category</i> ".	Yes 29
Trend Analysis	It is unreasonable to expect all VMT indicators to always go in the right direction. Sometimes the indicators will be impacted by exogenous factors that the MPOs cannot control, including transit ridership, for example. Transit ridership nationwide is trending downward, which is likely due to a booming economy that is increasing vehicle ownership. [FCOG]	CARB is aware that certain indicators may go counter to expectations. Hence, language has been added to the Draft Guidelines to indicate the purpose of the Trend Analysis to serve as a streamlined way to determine whether MPO's model output support the direction of GHG impacts projected in the plan, or whether further coordination between MPOs and CARB is needed.	Yes 38-39
Elasticity Analysis	Elasticity analysis should be removed, as there is no justification for the 85% screening threshold for checking model-based results. [CALCOG, CBIA] COG staff is particularly concerned with the proposed 85 percent aggregated screening criteria in the elasticity analysis. It is arbitrary and lacks any empirical demonstration of efficacy. Fresno COG remains strongly opposed to this approach in the continued absence of any defensible, empirical data to suggest this threshold is an appropriate touchstone by which all regions are to be evaluated. [FCOG]	CARB has developed the 85% screening criteria in consultation with experts to serve as a conservative rule of thumb to help identify where additional coordination and discussion with the MPO may be warranted. Similar concepts are also found in many traffic engineering applications, such as using the 85th percentile speed to set the speed limit at a safe speed, minimizing crashes and promoting uniform traffic flow along a corridor. CARB may still accept the SCS evaluation if the elasticity analysis is under the 85% threshold. It simply flags that more information is needed to better understand the synergistic effects of multiple strategies. Language has been added to the Draft Guidelines to indicate this intent of the 85% screening criteria. This is a piloted screening criterion.	Yes 41
Elasticity Analysis	Elasticity analysis should be removed: Studies, such as the CARB GHG Policy Briefs, include elasticities for varying geographic areas which may or may not be comparable to an MPO region and significant errors may be introduced in situations where due to research/elasticity limitations for a specified MPO strategy (i.e. research has not established an apples-to-apples elasticity; the geography of the elasticity does not match the geography of the MPO strategy, etc.), CARB staff, may choose/be required to apply a method even if the assumptions do not exactly match the specific conditions of the MPO strategy. [CALCOG] Elasticity analysis should be removed unless additional analysis is prepared to ensure that the elasticities are: (1) related to passenger vehicle GHG, as opposed to some other metric (e.g. total VMT, which includes larger vehicles); (2) that the ranges of elasticities and uncertainties about to their applicability to SB 375 targets are acknowledged; and (3) that allowances are offered for some of the SB 375 specifics, such as exclusion of through-travel. [CALCOG] The scientific literature addressing elasticity ranges of travel demand models is incomplete, especially regarding rural regions (as virtually all such studies have been performed exclusively in large, urban areas). The elasticity analysis ARB introduced does not reflect the synergy among different land use and transportation strategies, which are measured by the travel demand models the MPOs have been using in	CARB staff have proposed a new approach for GHG determination based on the direction provided by the Board during the 2018 GHG emission reduction target update process. ^{4,5,6} The feedback included a request to focus less on travel demand models, and increase focus on land use and transportation strategies when evaluating how these strategies are performing in the SCS. The Elasticity Analysis is a new part of CARB's SCS Evaluation Process to determine whether the implemented SCS would achieve the applicable GHG emission reduction targets, and as such will be piloted for the third round of SCS evaluations. The Elasticity Analysis evaluates whether the scientific literature supports the stated GHG emission reductions from the SCS. A number of studies report that regional VMT has a quantitative relationship with the implementation of land use, transportation, and other development strategies – otherwise known as elasticities. The empirical evidence and studies that form the foundation of the elasticity analysis are based on decades of research across multiple regions throughout the country and California. MPOs often use these same elasticities as part of the travel demand model development.	Yes 39-42

⁴ Resolution 18-12. *Proposed Update to Senate Bill 375 Greenhouse Gas Emissions Reduction Targets*. March 2018. Available at:

<https://www.arb.ca.gov/cc/sb375/finalres18-12.pdf>.

⁵ California Air Resources Board. *Updated Final Staff Report: Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets*. February 2018. Available at: https://www.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.pdf.

⁶ J&K Court Reporting. *Meeting of California Air Resources Board: Thursday, March 22, 2018*. March, 2018. Available at: https://www.arb.ca.gov/board/mt/2018/mt032218.pdf?_ga=2.243746631.330498114.1544123257-322284002.1543529202.

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	<p>quantifying GHG emissions in the SCS process. [FCOG]</p> <p>COG staff strongly suggests that there be an extensive period of testing and collaborative study with the MPOs from various regions before incorporating any such criteria into the SCS evaluation process. As a matter of professional practice, when MPOs develop their travel demand models, they are required to go through a calibration and validation process to see how well the model performs. Fresno COG believes CARB should take a similar approach and ensure it is a tool that will work and meet the State's needs. We are disappointed that CARB staff continues to take such a unilateral approach to developing and proposing such a method without consulting with MPOs and allowing for any pilot testing with any of the regionally approved SCSs. [FCOG]</p> <p>The travel demand models remain a superior quantification tool than the proposed elasticity analysis. [FCOG]</p> <p>We must rely on our common sense understanding of the objective of modeling which is to learn about actions not to predict and control outcomes. Context matters, and when the overarching narrative of CARB is that California is not on track to meet the greenhouse gas reductions of SB 375 and that tendentious narrative underlies the purpose for the EA, and when significant new policy changes (from financing to project review to regulatory reform) are not forthcoming, we must strongly recommend that [elasticity] be removed from the guidelines. [CBIA]</p>	<p>CARB will use this data, other empirical evidence, where available, and the MPO’s own sensitivity results of its travel demand model for the Elasticity Analysis. While this analysis is not intended to replicate the analysis done with travel demand models, it meets the Board direction of moving away from focused travel demand modeling review, and increase focus on land use and transportation strategies and evaluate how these strategies are performing in the SCS.</p> <p>It should be noted the Elasticity Analysis is not designed, nor able, to distinguish the effectiveness of individual RTP/SCS strategies and may not be sufficiently robust to discern effects for similar spatial resolutions. Given these limitations, the Elasticity Analysis described in this section is still a reasonable approach to evaluate the RTP/SCS strategies with a balance between transparency and technicality.</p> <p>When CARB initiated the update to the Guidelines, multiple public workshops were held throughout the State and via webcast to provide the concepts that would be included in the update and solicit feedback from stakeholders. CARB included in this outreach the concepts being proposing in the SCS Program and Evaluation Guidelines (Tracking Implementation, Incremental Progress, and Equity reporting components, and Elasticity Analysis), for review and comment by stakeholders and neither alternative approaches nor methodologies were proposed by stakeholders. As indicated on page 13 of the draft guidelines, " The updated <i>SCS Program and Evaluation Guidelines</i>...may be updated again as new information and data become available."</p> <p>CARB staff believes that it is not necessary to develop elasticities specific to SB 375 program at this time (excluding through travel and for light-duty vehicles only) because elasticities measures how one variable responds to a change in another variable. As long as both variables are measured at the same spatial and temporal conditions, it may be reasonably applied to SB 375 targets.</p>	
Policy Analysis	<p>On p. 36 (describing the analysis of “Transportation Policy” within the Policy Analysis): “CARB staff will qualitatively evaluate the relationship between the stated GHG emission reductions in the SCS and relevant MPO and local transportation actions <u>and investments, particularly investments that increase transit ridership by funding the operation of increased levels of transit service and by reducing transit fares. Other examples could include</u> actions such as grant or incentive funds to projects that make better use of their existing transit systems through first/last mile connection (e.g., micro transit, bike share), and subsidizing on-demand dynamic ridesharing support key SCS transportation strategies. ...” [NGO]</p>	<p>Text in the draft guidelines has been revised to reflect CARB's position.</p>	Yes 43
Policy Analysis	<p>Second sentence, Pricing Policy, page 37. Please update to read "<u>Moving forward, to the extent that a proposed statewide road user price replaces the current state fuel excise tax, Statewide</u> road user pricing is an example of a potential future State-initiated strategy that an MPO should not use to demonstrate compliance with the SB 375 GHG emission reduction targets. However, the MPO could <u>demonstrate compliance with the SB 375 targets by use (1) its ability to make reasonable assumptions about revenues appropriated to the MPO from State a proposed road user pricing that could be reinvested to further the region's SCS; or (2) the other effects of road user pricing in excess of the current state fuel excise tax.</u>" [CALCOG]</p>	<p>As indicated during the 2018 SB 375 target update process, MPOs cannot demonstrate compliance with state strategies and programs, such as State road user pricing. However, an MPO can make reasonable assumptions about revenues appropriated from State road user pricing that could be re-invested to further the region’s SCS. In addition, an MPO may demonstrate compliance through a regional or local pricing strategy (e.g., local/regional tolls or congestion pricing).</p>	No
Policy Analysis	<p>Land Use and Housing Policy, page 36. Please update the first sentence of this section to read, "<i>CARB staff will qualitatively evaluate the relationship between the SCS and relevant MPO land use and housing activities and actions forecasted development pattern and adopted SCS key actions</i>". [CALCOG]</p>	<p>Text has been revised, as appropriate.</p>	Yes 43
Investment Analysis	<p>Recognizing (e.g., on p. 31, and other places that refer to “project list”) that transportation investments critical to achieving both GHG reductions and social equity are made not only in “projects” but also in “programs,” including programmatic investments in transit operations and transit fare subsidies (including</p>	<p>CARB staff have updated the text appropriately in the investment section of the draft guidelines.</p>	Yes 45-46

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	<p>both fixed route transit and demand responsive transit) make text changes.</p> <p>Rationale: The lack of frequent, reliable and affordable local transit service is a key impediment both to achieving mandated GHG reduction targets and to achieving social equity. The 2018 Progress Report: California’s Sustainable Communities & Climate Protection Act finds that “transit operations has increased but just enough to keep pace with population growth and rising costs” (p. 26.) CARB’s review of MPO plans should expressly focus on strategy commitments that increase transit service levels and decrease fares, both of which are proven to increase transit ridership. [NGO]</p>		
Investment Analysis	<p>First full paragraph, TIP Funding Assessment, page 38. Please delete this paragraph. At the time of SCS review, the federally approved TIP considered by CARB would have been adopted under the existing federally approved RTP/SCS, and not the SCS under CARB's review. This means, new or enhanced RTP/SCS strategies may not be included in the TIP subjected to the proposed CARB review. [CALOCG]</p> <p>Review of the TIP as the primary means to determine short-term RTP/SCS implementation may lead to incorrect conclusions regarding transit investments. Except for preventative maintenance costs, transit operations are not federally eligible expenses for many transit operators across the state. This means an analysis of TIP investments may not capture the RTP/SCSs full short-term commitment to funding transit operations. While the TIP is one of many tools that describes short-term investments, it should not be used to generate overarching assumptions about an MPOs commitment to fund the strategies contained within its RTP/SCS for the reasons listed above. [CALOCG]</p>	<p>As indicated on page 45 of the Draft Guidelines, although the TIP in place at the time of SCS review may have been adopted under a previous RTP/SCS, the investments in the TIP "can give CARB staff an understanding of what projects are in the pipeline and how those may change travel patterns in the future". SCS review timelines vary depending upon the region's provision of information to CARB, and there may be cases when CARB is reviewing an SCS and the TIP has already been updated. However, the text has been modified slightly to further acknowledge that in most cases, the information in the TIP can inform CARB about the recent trajectory of spending, but, may not reflect the most current planning.</p> <p>The TIP is one of many data points that CARB uses. The draft guidelines acknowledge that the TIP does not include the full range of spending ("CARB staff understands that TIP may not reflect all the sources of investments such as state, local or formula funding," page 45). CARB staff nevertheless believe that the TIP can be a useful source of information regarding some investments, including significant transit capital investments. Federal eligibility is not the sole criteria for determining whether a project must be included in the TIP: "For public information and conformity purposes, the TIP shall include all regionally significant projects proposed to be funded with Federal funds other than those administered by the FHWA or the FTA, as well as all regionally significant projects to be <i>funded with non-Federal funds</i>." 23 CFR § 450.326 (f), emphasis added.</p>	No
Plan Adjustment Analysis	<p>Third sentence, Plan Adjustment Analysis, page 38. To ensure consistency across the CARB Determination Elements of the Guidelines, please make the following edit: <i>"If CARB staff determines that an MPO is not hitting milestones with respect to SCS implementation, to give CARB staff the assurances it needs to determine that a region is capable of meeting its 2035 GHG emission reduction targets, CARB staff will look to the MPO for evidence <u>that the MPO has considered these challenges and has either changed its strategy, or is putting measures in place to accelerate implementation in order to stay on track, as necessary to meet the target, if applicable.</u>"</i> [CALCOG]</p>	<p>Text has been revised, as appropriate.</p>	Yes 46
Plan Adjustment Analysis	<p>Add the underscored language on p. 38 (under the heading “Plan Adjustment Analysis”): “Some MPOs have indicated that they will provide an RTP/SCS implementation assessment report for this element that describes the implementation status of adopted RTP/SCS strategies. <u>In order to assist in answering the question this analysis asks (as stated on p. 30: what measures are the MPO taking to correct course in the plan, as necessary, to meet the target?), such a report should both (a) identify whether each of its key strategies and commitments is being implemented, as contemplated in the plan, and (b) assess the effectiveness of each in reducing VMT and GHG emissions.</u>”</p> <p>Rationale: The text on p. 38 gives the impression that simply providing an RTP/SCS implementation assessment report will satisfy this analysis. It should be clarified to state that such a report will satisfy prong (a), and that prong (b) (effectiveness) must also be assessed, in order to answer the ultimate questions whether a change in course is needed, and if so how the MPO has made that course correction. [NGO]</p>	<p>Due to the interactive and synergistic effects of multiple strategies and other exogenous variables in reducing VMT and GHGs, individually quantifying the efficacy of each implemented strategy is difficult and may overestimate or underestimate impacts. Under this new evaluation, CARB staff will evaluate the aggregate impact on regional GHG and VMT of the plan strategies and exogenous variables. Separately, CARB staff will report the implementation status of RTP/SCS strategies and compare those indicators to plan performance measures in the Tracking Implementation section.</p>	No
Data submittal and information sharing	<p>Strategy Performance Indicators (Outcomes), page 28: Local agencies should have discretion to decide these issues to meet their local transit service goals. Seat utilization is affected by policy decisions at the local level, in terms of service goals. Some agencies may decide that larger vehicles are important to meet peak loads,</p>		Yes 30, 31, 41, 56

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	<p>even though those same vehicles might be underutilized in the off-peak. Other agencies might make the opposite decision. As a result, load factors are important at the route level, or perhaps the transit/local agency level. [CALCOG]</p> <p>Transportation project list, last bullet, page 28. We request some flexibility in the format of the requested transportation project list provided by MPOs to CARB. For example, some MPO project lists are an InDesign file that is made publicly-available as an Adobe Acrobat .pdf file and in EXCEL format that could lose content in the conversion process. [CALCOG]</p> <p>As noted in the Guidelines, some data is more readily available than other data. As a result, we raise concerns about the ability of all 18 MPOs to produce model data for all the performance indicators listed and presume as the Guidelines imply, CARB staff will work with our respective staffs to prioritize data needs based on available resources. [CALCOG]</p> <p>MPO Data Submittal Table to CARB, pages 47-51. One size does not fit all. The MPO Data Submittal Table contained in the Guidelines is an example where one size may not fit all. Consistent with CARB's first two rounds of RTP/SCS review, we presume CARB staff will be flexible in allowing updates to the table should data be unavailable or not applicable. A few limited examples where adjustments to the table may be necessary include, the applicability of tolls within a given MPO region or the availability of bike and pedestrian lane mile data. [CALCOG]</p> <p>Trip and Emissions Data Needs, page 84. MPO staff assume CARB will allow discretion as MPOs refine their off-model methodologies as technology evolves or more specific MPO data becomes available. We recommend adding this clarifying language in the guidelines. In many cases as with the carshare/bikeshare/pooled rides off-model strategies, the services are operated by private transportation service providers, which may be unwilling to share data needed to regularly monitor/track program Operations as the Guidelines indicate. A statement in the guidelines recognizing this issue would be helpful. [CALCOG]</p> <p>Induced travel takes place when capacity increasing projects are built where there is current or future projected congestion. However, regions have different levels of sophistication for measuring/quantifying induced travel depending on congestion levels and the resources available. CARB should allow flexibility for smaller regions with fewer resources to assess induced travel through either quantitative or qualitative methods that are most appropriate to them. [FCOG]</p> <p>Proposed CARB methodologies require significant increases in staff, effort and modeling tools to accomplish: Larger MPOs may have the staff hours and funds to spare in completing new analysis and reporting, but smaller MPOs barely have the staff to fulfill normal planning obligations, much less take on massive additions in workload as proposed the draft guidelines propose. [FCOG]</p> <p>Fresno COG believes a bottom-up approach to SCS evaluation is preferable to a top-down approach. Each region's SCS has a unique set of strategies, challenges and priorities that are tailored to that region and are understood best by the local governments and the MPOs that serve them. Forcing MPOs to conform to a statewide standard when it comes to pursuing specific strategies belies the nature of regional planning, as well as the distinction between urban and rural regions. [FCOG]</p>	<p>Language has been added as footnote 55 to the Draft Guidelines indicating that MPOs may provide alternative data and formats, as applicable. If providing alternative data or formats, MPOs would need to provide an explanation for why alternative data, formats, etc. are necessary.</p> <p>The MPO Data Table Submittal to CARB has been streamlined and 25 variables were removed from the data tables previously used in prior SCS determinations. In addition, if MPOs are having issues with the data table submittal process, CARB staff will work with MPO staff to find alternatives for data needs.</p> <p>MPOs also have discretion to quantify off-model strategies or employ calculation methods not specified in the draft guidelines if they document their "methodology, assumptions, and datasets, in addition to demonstrating how each component of the off-model framework from the guidance is addressed and satisfied." (Appendix E, page 43). This language has been moved up at the beginning of the off-model appendix (Appendix E) to more clearly indicate local discretion for off-model strategies and methodologies.</p> <p>For Induced travel analysis, text has been updated to include alternative methods including elasticity analysis and a reference to the UC Davis National Center for Sustainable Transportation's Induced Travel Calculator.</p> <p>Throughout the draft guidelines CARB has provided discretion to MPOs to provide alternative attributes and approaches. CARB has built flexibility for working with MPOs into the <i>SCS Program and Evaluation Guidelines</i>. Examples of where this flexibility is specifically indicated are:</p> <ul style="list-style-type: none">• Section VI Land Use and Transportation System Characteristics• Section VI Performance Indicators• Section VI Elasticity Analysis• Table 6 Incremental Progress exogenous variables• Table 7 allows for flexibility with the MPO Data Table Submittal to CARB• Appendix B Sensitivity tests• Appendix C Plan Data and Performance Indicators• Appendix E off-model approaches <p>The types of strategies and key actions included in the SCS are within the discretion of the MPO of a given region. Further, strategies and key actions indicated in table 2 of the SCS program and evaluation guidelines are all for illustrative purposes only and it's not a prescription of CARB staff.</p>	
Data submittal and information sharing	On p. 28: "MPO's adopted transportation project <u>and program investment</u> list, including project costs, funding source (if known/available), <u>period by which the</u> project will be in operation (e.g., <u>by 2020, by 2035, after 2035, or ongoing, in the case of programmatic investments that will be made annually throughout the</u>	CARB staff have updated this language, as appropriate.	Yes 31-32

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	<p>RTP/SCS), and project locations, in Excel and visual format.” Additionally, this information must be available throughout the update process to the RTP/SCS and both drafts and final project and program investment lists should be made available.</p> <p>Rationale: MPOs should be required to identify the timeline within which each project will come on line. That is something that each MPO/project sponsor should be able to articulate transparently in the RTP/SCS, and in the transportation project list that CARB proposes to require. In addition, for capital projects, the relevant date for impact on VMT and GHG emissions is not the date of expenditure of funds, but the date by which the service will be operational. The TIP is not likely to be informative on any of these issues; rather, the MPO should provide transparent information. [NGO]</p>		
Sensitivity Test	<p>Transit and Active Transportation Sensitivity Test and Reporting, pages 61-63. Some of the performance indicators may be calculated differently by different regions due to differences between the respective MPO travel demand models. For example, a commute travel time could be calculated as home to work, but if a stop is made (dropping off kids at school) is the travel time measured from school to work, or home to work including the drop-off, or some other measure. Each MPO will report the applicable performance indicator consistently within their data, but some performance indicators may not be comparable across MPOs due to the definition applied. [CALCOG]</p>	<p>Text has been added to the draft guidelines to indicate each MPO may estimate the performance indicators slightly different due to limitations of their data and tools as part of their sensitivity tests.</p>	<p>Yes 31</p>
EMFAC Adjustment	<p>Due to CARB's practice of is continuously improving and updating EMFAC with the most up-to-date data availability regarding fleet mix, emission factors, etc., there will be eight years of gap between the first and third SCS, and EMFAC would have been updated several times during that period. The proposed EMFAC Adjustment Methodology will force MPOs to use an out-of-date version of EMFAC and demonstrate the GHG emission reduction in a numeric value that is neither current nor accurate. The outcome will be confusing and potentially deceiving to the public and elected officials regarding the region's true GHG reductions.</p> <p>Fresno COG asks CARB to reconsider the proposed EMFAC Adjustment Methodology and develop a new methodology that is fair to all MPOs and reflects each SCS's true achievements. [FCOG]</p>	<p>SB 375 indicates that MPOs may not take credit for state programs and policies that improve vehicle emission standards, changes in fuel composition, and other State measures that will reduce GHG emissions, such as the Advanced Clean Cars (ACC) and the Low Carbon Fuel Standards (LCFS), when demonstrating GHG emission reduction targets. Therefore, in order to normalize the effects from updated versions of EMFAC, CARB staff developed an EMFAC Adjustment Methodology. This methodology has been used by all MPOs in their previous RTP/SCSs.</p> <p>With changes in the model data, the resulting fleet-wide CO₂ emission rates vary from one version of EMFAC to the next. These variations occur solely due to changes within EMFAC can change the performance of a MPOs RTP/SCS even if nothing else changes in the RTP/SCS. Therefore, for the third round of RTP/SCSs, MPOs should continue to use this approach. In other words, MPOs should use the exact same methodology and version of EMFAC as used in the second RTP/SCS for the third. Effectively, this ensures that should nothing else change, the performance of the third RTP/SCS will be identical to the second RTP/SCS.</p> <p>Staff selected this proposed approach to ensure that should nothing else change, the performance of the third RTP/SCS will be identical to the second RTP/SCS.</p>	<p>Yes Appendix D, pages 23-24</p>
TNC ride-sharing data	<p>The Guidelines state that use of TNC ride share data is the "preferred approach" for several variables, while the SB 150 report highlights, "Transportation Network Company (TNC) trip-level data is not available to State, regional, and local public agencies, nor to academic researchers in California," CARB should encourage the California Public Utilities Commission (CPUC) to require Transportation Network Companies (TNCs) to share key data that supports better policy determinations. [CALCOG]</p>	<p>This comment is outside the scope of the SB 375 guidelines.</p>	<p>No</p>
Public Process	<p>Add the underscored language on p. 36: “The Policy Analysis will be conducted by CARB staff through independent review of the MPO’s SCS, dialogue with MPO staff, <u>input from groups representing community residents</u>, and researching relevant planning efforts and key actions.”</p> <p>Rationale: Community advocacy and organizing groups have invested significant time in bringing their needs and concerns to their MPOs, and often bring forward creative solutions that would both reduce GHG emissions and better meet the needs of underserved and overburdened communities. The expertise of these groups is a valuable resource, both to their MPOs and to CARB in its review process. [NGO]</p>	<p>Text indicating “CARB staff encourages feedback from the public” has been added to the SCS Evaluation Process section.</p>	<p>Yes 19</p>

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	<p>Third sentence, Transportation Policy, page 36. Please update the sentence to read, "On the other hand, not reflecting assessing short-and long-run impacts, as applicable, of capacity and associated induced VMT in the region's travel demand modeling analysis suggests to CARB that the SCS may be at risk of not meeting its GHG emission reduction targets. "</p> <p>This edit ensures the Guidelines are consistent with OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA. OPRs Technical Advisory includes a list of projects not likely to lead to a substantial or measurable increase in vehicle travel that generally do not require an induced travel analysis and allows for non-modeling approaches. [CALCOG]</p> <p>OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA states, "Given that lead agencies have discretion in choosing their methodology, and the studies on induced travel reveal a range of elasticities, lead agencies may appropriately apply professional judgment in studying the transportation effects of a particular project. "</p>		
Consistency with OPR Guidelines	We presume this same level of discretion will be allowed to meet the intent of the Guidelines and request that this language be added to the Guidelines for clarification. [CALCOG]	Text has been revised, as appropriate, with footnote 62 added to clarify alignment with OPR's guidance.	Yes 43
Glossary/define key terms	<p>Please add a glossary of key terms to the document. Terms such as "strategy, commitment, attribute, and policy" have multiple meanings in the context of the Guidelines. For example, the term "strategy" can be used to describe an individual project, such as the construction of a bike lane or a higher-level policy such as increase density by X percent. We request the addition of a glossary of terms to ensure we are all operating from the same definition for purposes of SCS review. [CALCOG]</p> <p>We request additional clarity be provided for the phrase "tracking implementation needs." We request CARB clarify whether its interest is "strategy implementation" (are policies in the plan being implemented?) vs "on-the-ground progress" (are we implementing capital projects and building housing/jobs in line with the forecasted development pattern?) For example, inclusionary zoning is a "strategy." Affordable housing is the thing "on the ground." This nomenclature is unfortunately a bit confusing. The Guidelines seem to use strategies and outcomes often to mean the same thing when they do not. [CALCOG]</p>	A glossary and list of key terms has been added and additional clarification has been provided throughout the draft guidelines.	Yes 6, Appendix C
Glossary/define key terms	We request CARB provide clarification on the following indicators: seat utilization, household VMT (is this MPO household or MPO resident? Are group quarters included? E-1 included? Visitors?). [CALCOG]	A glossary and list of key terms has been added and additional clarification has been provided throughout the draft guidelines. Please refer to Glossary of terms for Seat Utilization and Household VMT definitions.	Yes 6, Appendix C
Glossary/define key terms	Definitions of Transit Operation Miles and Daily Service Hours, page 66. The definitions of transit operation miles and transit daily service hours should specify whether these are revenue hours and revenue miles. We recommend using the National Transit Database definitions provided in the link below: https://www.transit.dot.gov/ntd/national-transit-database-ntd-glossary . [CALCOG]	A glossary and list of key terms has been added and additional clarification has been provided throughout the draft guidelines. The definitions of Transit Operation Miles and Daily Service Hours have been revised based on the definitions in the National Transit Database.	Yes 6, Appendix C
Glossary/define key terms	<p>Throughout (e.g., p. 30), replace “strategies” with “strategies and commitments.” Define “commitments” and “strategy commitments” (e.g., p. 31) as including the “strategies, key actions, and investments committed by the MPOs in their RTP/SCSs.”</p> <p>Rationale: This is essential to faithfully implement the Board’s direction “to place greater attention on the strategies, key actions, and investments committed by the MPOs and the jurisdictions they represent” (p. 5.). [NGO]</p>	A glossary and list of key terms has been added and additional clarification has been provided throughout the draft guidelines.	Yes 6, Appendix C