Overview

• Background on SB 375
• Need for Updating SCS Program & Evaluation Guidelines
• Changes Since Last Draft
• SCS Evaluation Components
• Comments Received and CARB Responses
• Next Steps
Background: SB 375

• Supports the State’s climate goals
• MPOs prepare an Sustainable Communities Strategies (SCS) or Alternative Planning Strategy to reduce GHGs through coordinated land use & transportation planning
Need for Updating SCS Guidelines

• CARB Board direction to shift focus to SCS strategies and associated actions

• Provide clarifications on SCS Evaluation Process

• Standardize review of GHG emissions quantification
Changes Since Last Draft

• Four comment letters received, and guidelines revised to
  • Incorporate applicable stakeholder feedback
  • Improve document organization, clarity, and flow

• Comment letters, responses to comments and revised Guidelines can be found at:
  https://ww2.arb.ca.gov/index.php/resources/documents/scs-evaluation-resources
Strategy-based SCS Evaluation Process

**Tracking Implementation – SB 150 (Reporting Component):**
Report on the progress regions have made towards meeting their SB 375 GHG reduction targets.

**Policy commitments (Determination Component):**
Determine whether the planned strategies and commitments, when fully and effectively implemented in a timely manner, would achieve the GHG reduction targets, and whether there are any risks to not achieving those commitments.

**Incremental Progress (Reporting Component):**
Report on whether an MPO’s proposed SCS has more or enhanced strategies than the currently adopted SCS.

**Equity (Reporting Component):**
Report on the efforts MPOs are taking to meet federal and state requirements related to equity.

Lessons Learned
Applicability of SCS Program and Evaluation Guidelines

- Will only apply to third SCSs
- SCS Program and Evaluation Guidelines may be updated again as new information and data become available

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Comments Received and CARB Responses

SCS Program & Evaluation Guidelines

https://ww2.arb.ca.gov/resources/documents/scs-evaluation-resources
Tracking Implementation – SB 150

**Comment**
- Distinguish SB 150 and SB 375 requirements

**CARB Response**
- The CARB Board directed in Resolution 18-12 to include tracking SCS implementation (reporting component)
- The focus of SB 150 progress report is to evaluate regional progress using a common set of metrics across all MPOs
- Tracking implementation would provide more comprehensive reporting of implementation status using additional indicators tailored to adopted RTP/SCS strategies
Policy Commitments

Comment
• Clarify how five analyses are used or weighted in CARB’s SCS determination

CARB Response
• CARB will use the entire body of evidence presented in the data, and results from the five analyses to support our SCS 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
Policy Commitments – Elasticity Analysis

Comment

• Remove elasticity analysis
• Not enough data/evidence to apply at detailed/geographic level
• CARB and MPOs should develop an alternative approaches

CARB Response

• Empirical evidence and studies form the foundation of the elasticity analysis based on decades of research across multiple regions
• MPOs often use this same body of research and other similar methods as part of their model development
• Elasticity analysis will be piloted for the third round of SCS evaluations
<table>
<thead>
<tr>
<th>Comment</th>
<th>CARB Response</th>
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<tbody>
<tr>
<td>• Include the effects of road user pricing to demonstrate compliance of SB 375 targets</td>
<td>• MPOs cannot include state road user pricing to demonstrate achievement of target, however</td>
</tr>
<tr>
<td></td>
<td>• MPO can make reasonable assumptions about revenues appropriated from State road user pricing that could be re-invested to further the region’s SCS</td>
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<td>• MPO may demonstrate compliance through a regional or local pricing strategy (e.g., local/regional tolls or congestion pricing)</td>
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Policy Commitments – Plan Adjustments

**Comment**

• SCS should evaluate the effectiveness of individual strategy and program in reducing VMT and GHGs when describing the implementation status of adopted SCS strategies

**CARB Response**

• Quantifying the efficacy of each implemented strategy is difficult due to the interactive and synergistic effects of multiple strategies and other exogenous variables in reducing VMT and GHGs

• CARB staff will report the implementation status of RTP/SCS strategies and compare those indicators to plan performance measures in the Tracking Implementation section
Incremental Progress

**Comment**

- Outside of SB 375 Program
- Requirement for 14 of the state's 18 MPOs is inconsistent with SB 375 and CARB's Board's action during March 2018 target setting

**CARB Response**

- The CARB Board directed in Resolution 18-12, to include an incremental progress (reporting component)
- As indicated in March 2018 Staff report, Incremental progress is applicable to the Big 4 and 8 San Joaquin Valley MPOs
**Equity**

**Comment**
- Outside of SB 375 program
- MPOs are already following appropriate state and Federal laws related to equity

**CARB Response**
- The CARB Board directed in Resolution 18-12 to include an equity reporting component
- CARB staff will report the efforts MPOs are taking to meet the requirements of the state and federal laws related to equity
Equity

Comment
• Adequately analyze all significant strategies and projects, specifically with regard to whether and how well they are meeting important needs of underserved communities

CARB Response
• The new Equity reporting component does not include any additional requirements beyond those required by state and federal transportation planning requirements
• CARB will report any additional equity analyses above and beyond conducted by MPOs if provided by MPOs
Other Comments – EMFAC Adjustment

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<tr>
<td>• Remove or add new EMFAC adjustment method</td>
<td>• SB 375 law indicates that MPOs may not take credit for state programs and policies. Consequently, CARB developed an adjustment to remove the effects of state programs. This approach has been used by all MPOs for their 2nd SCSs</td>
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<tr>
<td></td>
<td>• CARB is proposing MPOs use the same version of EMFAC &amp; same adjustment methodology approach for their third SCS as they did for the second SCS</td>
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</table>
Other Comments – Local Discretion and Resources

**Comment**
- Guidelines need to allow for local discretion and flexibility due to MPO resources and data availability

**CARB Response**
- CARB will work with MPOs when potential issues may arise
- MPOs may provide alternative attributes, data, approaches, or formats based on coordination between CARB and the MPO
## Other Comments – Add Glossary and Key Terms

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<thead>
<tr>
<th><strong>Comment</strong></th>
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<tbody>
<tr>
<td>• Please add a glossary of key terms to the document</td>
<td>• A list of key terms has been added and additional clarification has been provided throughout the Draft Guidelines</td>
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Next Steps

<table>
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<tr>
<th>Event</th>
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<tbody>
<tr>
<td>Release Final SCS Program &amp; Evaluation Guidelines</td>
<td>Later this Month</td>
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</table>
Thank you.

Please email questions to: SustainableCommunities@arb.ca.gov