

January 24, 2020

Mr. Kome Ajise
Executive Director
Southern California Association of Governments
900 Wilshire Blvd., Suite 1700
Los Angeles, California 90017

RE: CARB comments on SCAG's draft update to its 2020 RTP/SCS

Dear Mr. Ajise:

California Air Resources Board (CARB) staff appreciate the opportunity to review and engage with the Southern California Association of Governments (SCAG) staff on the draft update to its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) known as "Connect SoCal." This work is more important than ever as CARB's first SB 150 progress report¹ showed that California is not on track to meet the greenhouse gas (GHG) reductions expected under Senate Bill (SB) 375 for 2020 and that vehicle miles traveled (VMT) is increasing. To achieve the State's climate mandates, California needs significant and immediate changes to how we plan, fund, and build our communities and transportation systems. Recognizing this, Governor Newsom signed Executive Order N-19-19 this past September to redouble the State's efforts to reduce GHG emissions, with an explicit focus on lowering VMT. The SCS plays a critical role in supporting the State's climate efforts, as well as local objectives to create an economically vibrant region that responds to the needs of its diverse communities and provides better access to jobs and cleaner air for its residents. We appreciate SCAG's work as we endeavor together to achieve these shared goals.

In meetings held in December 2019 and January 2020, CARB staff voiced concerns that SCAG's 2020 draft RTP/SCS is missing information CARB needs to conduct its GHG evaluation under SB 375. For all third round RTP/SCSs, like Connect SoCal, CARB will focus on assessing whether plan GHG reductions are reasonably supported

¹ CARB's 2018 Progress Report: California's Sustainable Communities and Climate Protection Act at: <https://ww2.arb.ca.gov/resources/documents/tracking-progress>.

with regional implementation actions and investments. After discussing these expectations, CARB and SCAG staff agreed on additional information and clarifications that SCAG staff will make in the final 2020 RTP/SCS based on CARB's updated Sustainable Community Strategy Program and Evaluation Guidelines.² CARB staff appreciate SCAG staff's cooperation and commitment to incorporate these items, which include:

- Adding performance reporting for the year 2035 to demonstrate how SCAG's plan meets the 2035 GHG emissions reduction target (e.g., through changes in VMT, mode split, and trip length).
- Clarifying what strategies are being quantified for credit toward achievement of SCAG's SB 375 2035 target, and making sure these correspond to the strategies listed in SCAG's Technical Methodology submittal to CARB. Currently, the strategies listed in the draft RTP/SCS and the Technical Methodology are different and use inconsistent terminology.
- Clarifying the description of SCAG's Preferred Scenario/Final Growth Vision as referenced in the SCS Technical Report and Chapters 3 and 4 of the Draft Plan, so CARB staff can identify what principles SCAG has applied to develop the final adopted development pattern, and to what extent SCAG's preferred scenario is a change from current trends.
- Adding information identifying the commitments, investments, and actions SCAG and its local members are making to demonstrate why the land use growth constraint assumptions in the plan are likely to be implemented, and therefore reasonable for inclusion.
- Adding long-term induced demand analysis information and associated estimates of VMT and GHG into the final plan's GHG emissions and VMT.

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

- Clarifying how the current 6th cycle and previous 5th cycle regional housing needs allocation (RHNA) are or are not reflected in the plan, so CARB can verify that the plan development pattern and strategies reflect best available information, and are therefore reasonable.

In addition, as we discussed, we request that SCAG staff provide the following information that is equally critical to our evaluation:

- Adding reporting of observed data as it relates to achievement of the latest 2020 targets, and if needed, discussing what adjustments and changes SCAG has prioritized in the SCS to get the region on track to achieve its 2020 target as soon as is reasonably practicable. Given that 2020 is a milestone year for SB 375, CARB staff expect that MPOs will continue to monitor and report current observed data as it relates to the 2020 targets within their SCSs.
- Adding data on the status of implementing all strategies and actions that were included in its previous 2016 RTP/SCS such that CARB staff can discern progress the region has made towards meeting its GHG emissions reduction targets through its implementation efforts. SCAG should also include discussion of how this information has influenced change in the set of strategies and actions included in the 2020 RTP/SCS. CARB's evaluation will include reporting on the region's implementation status.
- Clarifying for each strategy what SCAG staff is assuming regarding the applicable geographic scope, with specific locations if known; the implementation timeframes; and what measurable actions and investments SCAG and its member agencies will make to support and track strategy implementation. CARB will use this information to assess whether the strategies are likely to be implemented as assumed, and are therefore reasonable for inclusion and credit. Adding this information is especially important for the following highlighted draft strategies:
 - Pricing strategies (i.e., mileage-based user fees, TNC user fees, and congestion pricing). SCAG may be able to attribute emissions reductions from these strategies toward SB 375 target credit provided what the region

implements is above and beyond State actions.³ To do so, SCAG needs to provide the above requested information (i.e., geographic scope, implementation timeframes and measureable actions and investments) and should clarify how SCAG has made reasonable adjustments to previous pricing assumptions from the last plan. For example, providing evidence of regional actions to support pricing implementation.

- Multimodal dedicated lane strategy. SCAG needs to provide the above requested information (i.e., geographic scope, implementation timeframes and measureable actions and investments) and should clarify why it is reasonable to assume emissions reductions from conceptual-phase complete streets projects for the 2020 RTP/SCS that are not reflected in the fiscally constrained RTP project list.
- Adding regionally specific data to support SCAG’s adjustment of baseline trip level VMT and GHG emissions for Telemedicine and E-Commerce trip reductions for medical and retail trips for the 2020 RTP/SCS. CARB staff are concerned about SCAG’s inclusion of Telemedicine and E-Commerce baseline VMT adjustments based on the data SCAG is using to develop its assumptions. SCAG is currently using information based on national and international data regarding health care claims and retail sales and has not provided clear evidence that trends in these data sets translate to reductions in GHG emissions, trips, or VMT in Southern California. We understand that SCAG is working to provide local data to CARB, as well as develop a more conservative approach. However, if SCAG cannot provide sufficient local supporting data, CARB staff recommend removing these assumptions from the 2020 RTP/SCS and reevaluating their inclusion in subsequent RTP/SCS updates once local data are available.

³ See pages 28 – 29 of CARB’s *Updated Final Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets* at: https://ww3.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.pdf?_ga=2.25614781.1272438952.1572376271-1067821673.1540248233 and *Final Sustainable Communities Strategy Program and Evaluation Guidelines* at <https://ww2.arb.ca.gov/resources/documents/scs-evaluation-resources>, for discussion of Local/Regional Pricing Policy.

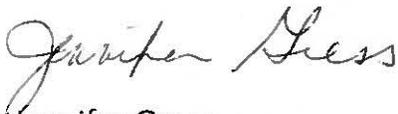
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CARB staff are committed to working with SCAG staff on potential approaches to address these requests and remedy aspects of SCAG's technical methodology for estimating GHG emissions.

Without this information, it is difficult for staff to determine whether the draft RTP/SCS would meet the targets. It would be helpful to receive the identified information prior to adoption, so that we have an opportunity to discuss any further issues.

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,



Jennifer Gress
Chief
Sustainable Transportation and Communities Division

cc: Nicole Dolney
Chief
Transportation Planning Branch