

September 20, 2024

Maura Twomey
Executive Director
Association of Monterey Bay Area Governments
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Dear Executive Director Twomey:

In accordance with the Sustainable Communities and Climate Protection Act of 2008, please find enclosed the California Air Resources Board's (CARB) Executive Order G-23-090 and CARB staff's evaluation of the Association of Monterey Bay Area Governments' (AMBAG) 2022 SB 375 Regional Transportation Plan/Sustainable Communities Strategy (2022 SCS). The Executive Order accepts AMBAG's determination that its 2022 SCS would, when fully implemented, achieve its target of a 6% per capita greenhouse gas (GHG) emissions reduction from automobiles and light trucks by 2035 relative to 2005 levels. CARB staff's evaluation report summarizes its assessment, findings, and recommendations relating to the determination on the 2035 target.

We would like to acknowledge some of the particularly positive aspects of the plan. CARB staff appreciates that AMBAG continues to work to increase transportation choices in the region with notable increases in the region's investments in transit, active transportation, and travel demand management in this plan.

Though the Executive Order accepts the 2022 SCS 2035 target determination based on a sufficient presentation of information that would support achievement if every strategy and measure were implemented, CARB staff is concerned that this plan will not be fully implemented as AMBAG envisions. More support will be needed to realize the land use and housing strategies at the assumed level. Nevertheless, the actions identified in the plan establish an important blueprint to guide future efforts.

Reducing VMT is more important than ever. As the 2022 Progress Report assessed progress toward the goals of Senate Bill 375, it was found that per capita VMT continues to increase statewide. The 2022 Scoping Plan Update, adopted by the CARB Board in December 2022, shows that new vehicle sales being 100% zero emission by 2035 will not be enough to achieve carbon neutrality by 2045. In addition to technology-based solutions, California needs to reduce VMT per capita by 25% by 2030 relative to 2019 levels, and 30% by 2045. Implementation of AMBAG's adopted 2022 SCS is an important element of achieving these ambitious goals. To support successful implementation, and the GHG benefits claimed, CARB staff includes specific recommendations in the SCS evaluation report and requests

AMBAG regularly monitor the implementation of the plan in consultation with CARB and other relevant agencies.

Looking to AMBAG's fourth cycle SCS, we encourage you to work closely with CARB staff as you prepare for the submittal of your next technical methodology prior to the start of your public participation process, as SB 375 requires. Doing so will ensure that the plan the AMBAG Board adopts appropriately demonstrates it meets the target and minimizes the back-and-forth with staff following plan adoption. CARB staff also encourage AMBAG's participation in CARB's process to update the SCS evaluation guidelines as we discuss potential changes to CARB's evaluation of quantification methodologies for subsequent cycles.

CARB staff appreciates AMBAG's continued work to advance environmental sustainability in a way that increases transportation choice and housing opportunities and looks forward to an ongoing partnership to implement this plan and develop the fourth cycle plan. If you have any questions or need further information, please contact me, at Jennifer.Gress@arb.ca.gov.

Sincerely,



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

Enclosures (2)

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