

October 28, 2024

Yuqi Wang
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RE: CARB Review of Metropolitan Transportation Commission/Association of Bay Area Governments' Draft 2025 RTP/SCS Senate Bill 375 Greenhouse Gas Emissions Revised Draft Technical Methodology

Dear Ms. Wang:

California Air Resources Board (CARB) staff received the Metropolitan Transportation Commission/Association of Bay Area Governments' (MTC/ABAG) revised draft 2025 Senate Bill 375 (SB 375) technical methodology (TM) on May 16, 2024, pursuant to requirements under California Government Code Section 65080(b)(2)(I)(i).

CARB staff appreciate MTC/ABAG staff sharing a draft TM for review in June 2023. CARB staff also appreciate that MTC/ABAG staff addressed many of the concerns from CARB's initial review of the draft TM in October 2023 in a supplemental document and the revised draft TM. However, there are still some issues remaining, which are outlined in Attachment 1 of this letter.

CARB staff can follow up with MTC/ABAG to discuss how to address these items if it is helpful. Please share revisions with CARB staff this fall for our verification prior to publicly releasing the quantification of greenhouse gas (GHG) emission reductions attributed to the 2025 Sustainable Communities Strategy (SCS). Given the extent of missing information and specific issues with proposed quantification formulas, it is critical that CARB staff and MTC/ABAG staff reach agreement on MTC/ABAG's TM as soon as possible to avoid publicly circulating estimates of GHG emissions that CARB may not be able to accept for purposes of meeting the region's GHG emission reduction targets.

Further, CARB staff have separately identified information on strategy assumptions used in the quantification formulas that we request be part of the draft 2025 RTP/SCS. CARB staff will need this information to evaluate whether the assumptions and GHG emissions being quantified are reasonable and to conclude whether the TM operates accurately. CARB staff understand that this information is likely not available until further into the 2025 RTP/SCS development process and perhaps cannot be finalized at this time. Providing this information as part of the draft 2025 RTP/SCS will facilitate CARB staff's early review and help avoid the risk of quantification issues arising during CARB's final SCS review.

Outstanding issues with quantifications that leave CARB staff unable to accept MTC/ABAG's determination as to whether its SCS meets GHG emissions reduction targets could lead to

the need for SCS revisions and further board approvals, the requirement to develop an alternative planning strategy under California Government Code Section 65080(b)(2)(H), and/or ineligibility for certain State transportation funds.

CARB staff are available to provide technical assistance and answer any questions that you may have about these comments or any other issues related to the SCS evaluation process. If you have any questions, please contact me at Carey.Knecht@arb.ca.gov.

Sincerely,

/s/

Carey Knecht, Branch Chief, Transportation & Land Use Planning Branch

Attachment

cc: (via email)

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Attachment 1 - Detailed List of CARB Questions, Issues, and Remedies

MTC/ABAG 2025 RTP/SCS SB 375 GHG Emissions Revised Draft Technical Methodology

Travel modeling and data

A. Auto operating cost

The revised draft TM provides more information about the proposed methodology for calculating auto operating costs (AOC) and the assumptions for travel modeling for the 2025 RTP/SCS. This method significantly deviates from the third SCS cycle methodology. In reviewing the new method, CARB staff determined that MTC/ABAG staff uses some elements of the method provided in CARB's 2019 Final Sustainable Communities Strategy Program and Evaluation Guidelines ("2019 SCS Evaluation Guidelines") (e.g., ACCI fleet mix) and adds fuel efficiency rebound effects as a new variable, which increases the AOC values in the future years (e.g., 2035). Applying this fuel efficiency adjustment as an update to the model particularly while not applying other updates, such as the updated fleet mix in ACCII, yields an inaccurate result. This is an important point to consider when reviewing CARB's previous communications. For instance, the methodology points to CARB's 10/17/23 letter advising use of a 1 percent rebound effect; however, within that same sentence, CARB advises the use of the ACCII fleet mix. Similarly, the methodology cites CARB's advice to utilize the ACCI fleet mix, but this was given in the context of advice not to apply a fuel efficiency rebound effect. Other specific concerns are described as follows:

- MTC/ABAG's AOC methodology assumes the same VMT elasticity to fuel price by fuel types (gasoline, diesel, EV, and hydrogen). In contrast, the literature shows higher price elasticity for gasoline and diesel than for electric and hydrogen vehicles.
- The fuel efficiency adjustment methodology is complex and not possible for CARB staff to validate, particularly in adjusting for long-term fuel efficiency changes. Even small changes in inputs produce large differences in outcomes.
- The second issue in the fuel efficiency adjustment is that it equates the elasticities of fuel efficiency and fuel price by assuming that a change in fuel efficiency will cause driving behavior to vary in the same ways as a change in fuel price. These elasticities are driven by different causes (price vs. technological change), and different behavioral responses are measured, even if the outcome is the same (i.e., VMT). Equating fuel price and efficiency elasticities to calculate the adjusted fuel efficiency oversimplifies the complex interplay between these factors and their distinct impacts on VMT.
- The fuel efficiency adjustment methodology does not distinguish between vehicles (e.g., gasoline, diesel, electric), which will produce inaccurate future travel behavior for electric and hybrid vehicles, especially as their adoption increases.

CARB staff have identified updating the AOC methodology as a priority for the next cycle of SCSs and intend to continue working with MPOs to update the methodology as part of CARB's 2019 SCS Evaluation Guidelines update process. This process will require extensive research to accurately reflect new data and regulations, public input, and continued collaboration between the MPOs and CARB staff.

Remedy: Please update the revised draft TM to use the AOC methodology in CARB's 2019 SCS Evaluation Guidelines. This should include unadjusted fuel efficiency (i.e., without adjusting for rebound effects for different fuel types). As part of the revised TM, please provide a spreadsheet that documents the calculation and actual values used for CARB staff verification.

Information request for the draft 2025 RTP/SCS: CARB staff encourage MTC/ABAG to include updated information in a TM document that is released for public comment at the same time as the draft 2025 RTP/SCS.

B. Induced travel demand

CARB staff appreciate that the revised draft TM includes a detailed discussion of the proposed methodology to estimate induced travel in the region. MTC/ABAG staff proposes to use the method applied in the third SCS cycle to assess short-term and long-term induced travel. This approach iterates the regional travel model with the regional land use model, Bay Area UrbanSim, which includes changes in residential location decisions, employment location decisions, residential development locations, and commercial and industrial development locations within the region. In the review, CARB staff could not identify what types of transportation projects will be included in MTC/ABAG staff analyses and the criteria used to select those projects for analysis.

Remedy: Please update the revised draft TM to describe the roadway expansion project selection criteria, the types of roadway capacity expansion projects that would be included in an analysis, and their functional class. CARB staff also recommends a sensitivity test for each roadway capacity expansion project type and their elasticity after iterating with the regional land use model to fully understand the short-run and long-run effects of different road capacity expansion projects.

Information request for the draft 2025 RTP/SCS: Given MTC/ABAG's use of integrated regional travel and land use models to quantify the induced travel demand impacts, please include a GIS layer to show the changes in land use, households, and employment at the travel analysis zone level. Please also include a detailed tabular list of transportation projects with functional class, added lane miles, number of added lanes, and lane types (e.g., GP, HOV, HOT, Express, tolled, and auxiliary lanes) specified for each project. Please also provide key outputs, such as VMT, mode share, transit ridership, etc. before and after iterating with the regional travel and land use models. In addition, if GP lanes would be converted to toll lanes, please identify the pathway MTC/ABAG intends to pursue that

would authorize lane conversions as California Government Code Section 64112(b) prohibits converting a GP lane to a tolled lane. If CARB staff does not have the information necessary to conduct this evaluation, CARB staff will be unable to conclude whether the TM operates accurately.

C. Travel model sensitivity tests

The revised draft TM indicates the need for sensitivity tests that were not included in the prior draft TM. CARB staff acknowledge MTC/ABAG staff's continued efforts to enhance the regional travel model and appreciate the commitment to provide sensitivity tests for new strategies. The revised draft TM describes the regional travel modeling process, data inputs, assumptions for exogenous variables, model enhancements, and related sensitivity tests for the regional mileage-based fee of one cent per mile (Strategy T5-Implementing Pricing Strategies to Manage Demand). CARB staff also understand that MTC/ABAG staff are in the process of conducting sensitivity tests for a newly developed sub-model that assesses the worker's work-from-home (WFH) probability and represents the observed WFH rates in the regional travel model, further discussed below in section D.

Remedy: Please update the revised draft TM to provide CARB staff with the sensitivity tests for all new on-model strategies and new sub-models before the draft 2025 RTP/SCS is released for public review. Please expedite the process of providing the sensitivity test results so that CARB staff can determine whether the regional travel model is capable of reflecting VMT and associated GHG emissions reductions from this SCS strategy.

D. Work from home

The revised draft TM assumes the share of WFH in the region based on newly observed data and a higher WFH rate in future years (27.7% in 2035) than previously assumed in the 2021 RTP/SCS (11.7% in 2035). CARB staff appreciate the thorough documentation and data sources supporting the proposed methodology. The revised draft TM assumes that the WFH rate, as measured by the American Community Survey (ACS), will follow a trend that declines until 2025 and then stays flat. However, an additional 6% is added to projected WFH rates, an adjustment based on the difference between the ACS measurement and the MTC modeled WFH rate calibrated using survey data collected in 2019. CARB staff question whether this difference remains applicable in post-pandemic years, especially considering the work-style changes during and after the COVID-19 pandemic. CARB staff understand that MTC/ABAG staff will evaluate additional data sources in summer 2024 and make adjustments if needed with additional data analysis.

In addition, the revised draft TM does not provide data on WFH's impact on VMT. CARB staff need to verify that the proposed quantification methodology appropriately captures rebound VMT, such as when telecommuters drive for other trip purposes that would not have otherwise occurred (such as a trip to the post office over their lunch break). While the revised draft TM states that this rebound effect is captured in the new WFH sub-model,

there is a lack of supporting documentation and data about the sub-model's rebound estimation. Also, please ensure the WFH sub-model properly accounts for the interaction between different strategies to avoid over-estimation of GHG emission reduction. For example, Strategy EN7-Expand Commute Trip Reduction Programs at Major Employers will likely increase the WFH rate, while Strategy EC5-Provide Incentives to Employers to Locate in Transit- and Housing-Rich Areas will likely shorten commute distance or reduce commute VMT. Therefore, when implemented together, the increase in WFH due to Strategy EN7 will yield less VMT reduction.

Remedy: Please provide summary statistics on the number of workers, WFH rate, and average commute distance by county as estimated by the sub-model. Please also document the rebound VMT estimated for different trip purposes. In addition, document how the WFH rates do not double count benefits from the other trip reduction strategies. This information will enable CARB staff to assess the estimated impact of WFH-related strategies on VMT and GHG emissions.

Strategy quantification

A. Potential strategies for quantification

The revised draft TM lists quantification approaches to estimate GHG emissions and preliminary modeling details for most SCS strategies. However, the provided table contains incomplete information for 18 strategies, listed below. The table identifies tools and / or intent to make off-model adjustments for each strategy but the revised draft TM still lacks details to explain how GHG emissions from these strategies will be calculated (e.g., without describing quantification methodologies, assumptions, or key factors).

- T2: Support community-led transportation enhancements in equity-priority communities
- T3: Enable a seamless mobility experience
- T4: Reform regional transit fare policy
- T6: Improve interchanges and address highway bottlenecks
- T7: Advance other regional programs and local priorities
- T9: Advance regional Vision Zero policy through street design and reduced speeds
- T10: Enhance local transit frequency, capacity, and reliability
- T11: Expand and modernize the regional rail network
- T12: Build an integrated regional express lanes and express bus network
- H1: Further strengthen renter protections beyond state law
- H2: Preserve existing affordable housing
- H4: Build adequate affordable housing to ensure homes for all
- H5: Integrate affordable housing into all major housing projects
- EC1: Implement a statewide guaranteed income
- EC2: Expand job training and incubator programs

- EC6: Retain and invest in key industrial lands
- EN1: Adapt to sea level rise
- EN4: Maintain urban growth boundaries

To better assess quantification of these 18 strategies, CARB staff need further details of how MTC/ABAG staff anticipate reflecting a strategy in the identified model/s or off-model calculations, what steps will be taken to calculate GHG emission reductions, and the sensitivity of the model/s to these strategies. CARB staff support MTC/ABAG's efforts to update key SCS strategies but need further information and details to evaluate whether GHG emissions being quantified are reasonable. If CARB staff cannot conduct this evaluation, CARB staff will be unable to conclude whether the TM operates accurately.

Remedy: Please update *Table 3: Plan Bay Area 2050+ Draft Blueprint Strategies and Quantification Approaches* in the revised draft TM to include more details, per strategy, on how GHG emissions reductions will be quantified for GHG emission reduction credit. Please provide a brief description (as appropriate) of each strategy (such as the existing and planned scope of the strategy), including details on how each strategy is reflected in the model (e.g., input variables, values, etc.), baseline assumptions, sources of data, forecasts, and associated assumptions for a given strategy in 2035, and the results of the model sensitivity test, if available. In addition, please clearly indicate whether strategies from the 2021 SCS have been discontinued or are not intended for GHG emission reduction credit.

For each strategy quantified using an off-model quantification methodology, CARB staff will need a description and the basic steps used in the calculation formula(s) to quantify GHG emission reductions including assumptions and key factors.

B. Electric vehicle strategies

The revised draft TM describes two electric vehicle (EV) strategies: the regional EV chargers and the vehicle buyback program (referred to as EV incentives in the 2021 RTP/SCS), which would be quantified using off-model calculation methodologies.

The documentation for the EV charger program indicates that MTC/ABAG will take credit for charging both EV and plug-in hybrid electric vehicles (PHEVs). The proposed method does not take into account the range of battery capacity, which may yield inaccurate results. In addition, the proposed method assumes that the energy consumption rate for battery electric vehicles (BEVs) and PHEVs will be the same in the base year and 2035, which may overestimate the GHG benefits. Further, under the SB 375 program, MPOs are eligible to receive credit for funding the installation of workplace chargers to charge PHEVs for the return commute only, not for EVs.

The proposed EV incentive quantification method estimates the GHG emission reductions without considering the existing market conditions, EV regulations (increasing sales up to

100% in 2035¹), and other state and federal incentive credits (e.g., Federal Inflation Reduction Act (IRA) tax incentives for EVs up to \$7,500), which may overestimate the benefits. Further, the proposed method does not consider EVs' cost declines (CARB staff Initial Statement of Reasons, Appendix G)² and cost parity for some vehicle types beginning in 2031, which may further reduce the benefits in calendar year 2035.

In the introduction paragraph of the proposed EV incentives quantification method, MTC/ABAG indicated that incentives will be provided to purchase used EVs. However, the proposed method in the draft and revised draft TM lacks supporting detail. Additional data and research are needed to confirm whether GHG emission reductions would result in used EV purchase benefits that are in addition to those resulting from the suite of existing state and federal programs. Currently, the federal government provides incentives to purchase used EVs up to \$4,000, and the State's Clean Cars 4 All also incentivizes low-income communities to upgrade to cleaner vehicles. Additional incentives from MPOs may not change the purchasing choices.

Remedy: Please update the revised draft TM quantification methods for the regional EV chargers and EV incentives. The EV charger quantification methods need to be updated to reflect PHEVs alone and take into account the average increase in the eVMT range per PHEV due to the increased battery capacity.

Please also update the proposed method for EV incentives to reflect the latest EV regulations, market conditions, and currently planned incentives, such as the federal IRA tax incentives, and the California Clean Fuel Reward. Further, the cost differential between ZEV and non-ZEV and impending cost parity in 2031 needs to be accounted for in the final GHG emissions quantification. The inclusion of ZEV incentives after 2031 may overestimate GHG emission reductions. CARB staff cannot evaluate and/or accept the proposed methods outlined in the revised draft TM without this information.

Information request for the draft 2025 RTP/SCS: Please provide the actual values for the items currently marked with placeholder "TBD" that are used in the calculation. CARB staff encourage MTC/ABAG staff to include this information in a TM document that is released for public review at the same time as the draft 2025 RTP/SCS. At a minimum, the information, even in draft form, needs to be provided to CARB staff for evaluating whether the GHG emissions being quantified are reasonable. If CARB staff cannot conduct this evaluation, CARB staff will be unable to conclude whether the TM operates accurately.

C. Pricing strategy initiatives

¹ For more information, see [CARB Advanced Clean Car II Regulation](#)

² For more information, see [CARB Advanced Clean Car II Zero Emission Vehicle Technology Assessment](#)

The revised draft TM describes a pricing strategy with initiatives that were included in the 2021 SCS. CARB staff understand that MTC/ABAG intends to advance a targeted per-mile tolling on congested freeways initiative and modify a parking pricing initiative in "areas targeted for housing and job growth". MTC/ABAG staff also proposes a new initiative that would implement a focused "mileage-based fee" on roadways.

CARB staff flagged issues in the *Evaluation of MTC/ABAG 2021 SCS* concerning the likelihood of pricing strategies being implemented in time to meet the GHG emission reduction targets or implemented at all because tolling on congested freeways requires enabling federal and state legislation. CARB staff also had concerns that the parking pricing initiative would not be fully implemented because the 2021 SCS did not include commitments from those responsible for implementation, such as county transportation agencies and private companies, and the MPO does not have the authority to implement the parking pricing initiative.

CARB staff reviewed MTC/ABAG's latest Implementation Progress Update, noting several actions supporting the implementation of the tolling initiative are underway. This includes outreach with communities, securing the support of the California Transportation Commission, and sponsored enabling state legislation. However, the revised draft TM and latest progress report do not document what actions have started for the parking pricing and mileage-based fee initiatives. This includes the development of how or when each initiative would be implemented.

Based on available information, CARB staff will need additional evidence to evaluate the assumptions for the parking pricing and mileage-based fee initiatives. Specifically, CARB staff need evidence of the timing for implementation.

CARB staff previously requested that MTC/ABAG staff demonstrate which on- and off-model strategies rely on assumed pricing revenues as a funding source. We understand that MTC/ABAG staff prepared draft financial assumptions for the 2025 RTP/SCS, which do not anticipate strategies would be funded by revenue from pricing strategies before FY2036. If assumptions about pricing revenue and their relationship to SCS strategies change, CARB staff may need additional information in the TM and draft 2025 RTP/SCS.

Remedy: Please update the revised draft TM to either include evidence of progress being made on these pricing initiatives, beyond planning studies, and show how this progress fits within the region's overall actions and timeline to advance strategy implementation in time to meet the GHG emission. The claimed quantified credit should be adjusted if a strategy revision or update would not yield the prior anticipated level of GHG emission reduction.

If any SCS strategies will rely on pricing revenues as a primary funding source, please update the revised draft TM to include how much pricing revenue is assumed, by what date, and reference where evidence of progress being made on pricing initiatives is discussed. Please consider whether adjustments to the timeline for implementation and quantified

GHG emission credit are needed based on the availability of pricing revenue, or whether alternative revenue sources can be identified for implementing impacted SCS strategies.

Information request for the draft 2025 RTP/SCS: Please include a description and the proposed changes to baseline conditions for each pricing initiative with supporting data and applicable variables in the draft 2025 RTP/SCS. For the parking pricing initiative, this may include, but is not limited to, the date(s) that rate increases would take effect, the assumed rate of increase in parking costs, the locations where the fee would apply, and types of land use that would be considered applicable.

For the mileage-based fee initiative, this may include, but is not limited to, the date(s) that the fee would take effect, locations where the fee would apply, the assumed fee rate, and types of roadways considered applicable. Please also include documentation of what public agencies are responsible for, what actions would be implemented, and how progress will be monitored. The information and detail are needed during CARB's final SCS review to assess whether the magnitude of proposed changes supports the claimed GHG emission and VMT reduction estimates. If CARB staff cannot conduct this evaluation, CARB staff will be unable to conclude whether the TM operates accurately.

D. Bike strategies

The revised draft TM outlines two bike-related off-model strategies that rely on new funding to support a new incentive-based rebate for purchasing electric bikes ("e-bikes") and more funding to expand bike-share programs. CARB staff understand both strategies would apply on a regional level.

CARB staff reviewed the proposed quantification method for the e-bike incentive strategy and noted that the approach accounts for VMT reduction from e-bike users, incentive-caused or not. The approach does not account for the effect of the new state incentive program (i.e., the California E-Bike Incentive Project), and may overestimate the impact of the regional e-bike incentive strategy.

The bike-sharing program is a strategy described in CARB's 2019 SCS Evaluation Guidelines but is modified to the region in the revised draft TM. In the review, CARB staff noted differences in the strategy inputs and assumptions between the 2021 SCS and 2025 SCS. For example, the assumed values for average VMT displaced per conventional bike share trip changed from 1.3 to 0.75 and 1.77 to 1.3 (respectively) based on "calculations." The information justifying different trips and calculation details are needed during CARB's final SCS review to assess whether the magnitude of proposed changes supports the claimed GHG emission and VMT reduction estimates. If CARB staff cannot conduct this evaluation, CARB staff will be unable to conclude whether the TM operates accurately.

Remedy: Please update the revised draft TM methods for the e-bike incentive strategy and bike-sharing strategy. For the e-bike incentive strategy, please update the proposed method to accurately account for the impact from the regional strategy, in addition to the

state incentive program. Please also update the proposed quantification method for the bike-sharing strategy to include what calculations MTC/ABAG staff used to determine the average VMT displaced per conventional bike share trip.

Information request for the draft 2025 RTP/SCS: Please identify the policies, programs, and/or investment actions that support the e-bike strategy. At a minimum, please identify the funding source(s) and commitments to implement the SCS strategy.

Revised growth geography data and information

CARB staff appreciate the ongoing efforts to track and document the implementation progress of a core land use strategy in the 2021 SCS. CARB staff are encouraged by MTC/ABAG to expand the Priority Development Area Planning and Technical Assistance Program and acknowledge that changes in the regional planning context may necessitate amendments to the program's policies and standards. CARB staff understand that MTC/ABAG staff will provide available data and information once the regional land use modeling is prepared later in 2024.

Information request for the draft 2025 RTP/SCS: Please include a description and the proposed changes to baseline conditions in growth geographies that will be amended in the 2025 RTP/SCS as compared to the 2021 SCS. Relevant data include, but are not limited to, the types of land uses, densities and intensities, and other variables used to estimate GHG emissions and VMT reductions. The information and detail are needed during CARB's final SCS review to assess the magnitude of proposed changes and whether assumed levels of growth support the claimed GHG and VMT reduction estimates underpinning multiple strategies. If CARB staff cannot conduct this evaluation, CARB staff will be unable to conclude whether the TM operates accurately.

Incremental progress analysis

The revised draft TM provides the preliminary results of an incremental progress analysis not included in the initial draft TM. CARB staff appreciate the modeling detail and available results to help understand what changes are needed to ensure the region can meet its GHG emission reduction targets. MTC/ABAG staff estimated the same set of strategies would result in 3.5% less GHG emission per capita reduction (the 2021 SCS achieves a 20% reduction while the 2025 SCS achieves a 16.5% reduction). CARB staff have reviewed MTC/ABAG's draft incremental progress analysis and understand that the decrease in the anticipated 2025 RTP/SCS performance reflects a compounding effect of exogenous variables and changes in quantification methodologies.

However, given the comments above, as well as the work the region is doing to refine its quantification methods of some existing SCS strategies, the incremental progress analysis will need to be updated. The updated analysis should detail the MTC/ABAG staff's approach to identify the contributions of key variables (e.g., document the existing

strategies, describe new strategies, list the exogenous variables summarize model updates, etc.) that maintain the level of claimed GHG emission reductions.

Information request for the draft 2025 RTP/SCS: Please update the incremental progress analysis with updates to the revised draft TM and the effects of changes to the SCS strategies undergoing further refinements in the 2025 RTP/SCS development process and the region's fiscally constrained project list.³ Please include documentation of the MTC/ABAG staff's approach to quantify the GHG emission reductions between its two SCSs. When identifying the contributions of key variables (e.g., existing strategies, new strategies, exogenous variables, model updates, etc.), please also clarify the following:

- Whether the 2021 SCS performance is dampened by differences in the representation of transportation network companies, taxis, and AVs between the Travel Model 1.5 used for the 2021 SCS and Travel Model 1.6 being updated for the 2025 SCS.
- Whether modeling changes reduce the efficacy of transit strategies (fare reform, seamless mobility, expansion, etc.) and project-based strategies (interchange improvements, transportation enhancements, etc.), similar to findings of the prior incremental progress analysis conducted for the 2021 SCS.

Finalizing the technical methodology

CARB staff intends to continue working together with MTC/ABAG staff to develop a complete and accurate TM. As a next step, please provide CARB staff with an updated TM that addresses the requested updates prior to publicly releasing GHG emission estimates for the 2025 RTP/SCS and continue to work with CARB staff until CARB staff conclude the TM operates accurately.

³ The revised draft TM notes strategies needing further development include: T3, T4, T10, T11, T12 and T2, T6, T7.