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Metropolitan Transportation Commission
San Diego Association of Governments
Southern California Association of Governments
Sacramento Area Council of Governments

June 9, 2025

Dr. Steve Cliff
Chief Executive Officer
California Air Resources Board
Sacramento, CA 95814

Re: Recommendations on 2026 Greenhouse Gas Reduction Targets

Dear Dr. Steve Cliff:

We would like to thank the California Air Resources Board (CARB) for meeting with MPOs on the target-setting process. Before offering comments on target-setting, we want to reiterate that Senate Bill 375 has changed regional transportation planning for the better. With each new iteration of our regional plans, we have seen better integration of land use, housing, and transportation policies, supporting better climate and quality of life outcomes for our residents. Importantly, the public has become more involved in the development of these plans, resulting in projects that are more responsive to our communities' needs. This progress should serve as the foundation for holistic review of the SB 375 framework and improve how state and regional agencies collaborate to deliver multiple housing, climate, and transportation goals.

While we would like to focus on improving the SB 375 framework, we recognize the need to meet current statutory requirements to adopt targets for the next cycle of regional plans. We would like CARB to consider the following points as it proceeds with target-setting:

Retain the Existing Ambitious Targets

With 2035 rapidly approaching, achieving the current targets will be a heavy lift. The next cycle of SCSs will have a time horizon of approximately five years to reach a 2035 target, despite the fact that long-range regional plans are focused several decades into the future as required by federal and state law. Furthermore, CARB proposes relying on unrealistic scenarios in the Scoping Plan which could increase the target by up to nine points. Not only is the time horizon too short to make such a drastic change, but it is applying a financially-unconstrained, top-down goal to a bottom-up, financially-constrained planning process.

The SCS Evaluation Criteria and Target Criteria Must Align

It is impossible for MPOs to provide recommendations on what the target should be without some shared understanding between MPOs and CARB about technical assumptions to be used in

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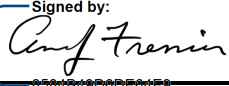
the next cycle of regional plans. Changes to auto operating costs (AOC), amount of credit given to MPOs for zero emission vehicle (ZEV) investments, and the version of EMFAC that will be used for evaluation purposes could translate to a de facto target increase. If CARB changes technical guidelines, the 19% GHG target should be adjusted accordingly to avoid a de facto target increase.

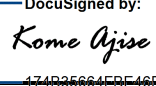
We Should Focus on Implementation Activities, Not Dissecting Model Assumptions

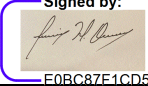
The current process has become unduly focused on attempting to precisely quantify greenhouse gas emission reductions through increasingly-complex travel models and analytical tools. Technical methodology processes last years and plan approval takes CARB a year or longer. The disproportionate focus on modeling and quantification ignores the more important goal of advancing the policies, strategies, and projects necessary to achieve greater emission reductions.

In conclusion, changing GHG targets under the current planning framework is premature. Both CARB and MPOs share a strong commitment to the success of SB 375. By collaborating, we can leverage our combined expertise and resources to create a planning framework that not only addresses current challenges but unlocks real-world implementation opportunities for the next decade and beyond.

Sincerely,

Signed by:

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 Andrew Fremier
 Executive Director
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CC:

- Tomiquia Moss, Secretary, California Business, Housing and Consumer Services
- Toks Omishakin, Secretary, California State Transportation Agency
- Sam Assefa, Director, Office of Planning & Research
- Mike Keever, Acting Director, California Department of Transportation
- Tanisha Taylor, Executive Director, California Transportation Commission
- Gustavo Velasquez, Director, California Department of Housing & Community Development