

March 29, 2024

Sarah Jepson, Planning Director
Southern California Association of Governments
900 Wilshire Boulevard, Suite 700
Los Angeles, California 90017
jepson@scag.ca.gov

RE: CARB Review of Southern California Association of Governments' 2024 SCS Senate Bill 375 Greenhouse Gas Emissions Draft Technical Methodology

Dear Ms. Jepson:

The California Air Resources Board (CARB) staff appreciate the ongoing collaboration with Southern California Association of Governments (SCAG) staff throughout the development of the 2024 Sustainable Communities Strategy (SCS). As SCAG staff prepare to ask the SCAG Regional Council to adopt the 2024 SCS on April 4, 2024, we want to be clear that CARB has concluded that the technical methodology SCAG is using to quantify the greenhouse gas (GHG) emission reductions for the proposed 2024 SCS does not operate accurately.

As discussed on multiple occasions and in [written comments](#), CARB staff have outlined specific concerns with SCAG's technical methodology and suggested remedies to address those concerns. In short, as discussed over the past few months, one crucial issue is SCAG's proposed auto-operating cost (AOC) methodology and assumptions. We have concluded that the draft methodology overestimates AOC values that will substantially underestimate the vehicle miles traveled and associated GHG emissions. We are willing to continue to work with you to resolve this issue for future SCSs; in the 2024 SCS, it is critical to use the established approach in the [2019 SCS Program and Evaluation Guidelines](#).

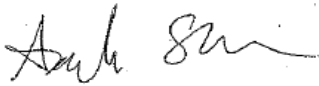
Apart from the AOC methodology, CARB staff have also shared detailed concerns about SCAG's technical methodology related to induced travel, electric vehicle incentives, job center parking and parking deregulation, off-model strategy assumptions, and emissions factors that need to be remedied. For these issues, the technical methodology is either lacking sufficient detail for CARB to review and/or the GHG emissions are not accurately estimated.

We have asked for, but not yet received, a revised technical methodology that resolves our concerns. We are committed to continuing to work with SCAG and all metropolitan planning organizations on these issues for future SCSs. In the interim and in the interest of timely review of SCAG's SCS by CARB, SCAG should use the AOC methodology as outlined in the [2019 SCS Program and Evaluation Guidelines](#) and work swiftly to address the remaining issues with the technical methodology using the remedies CARB has previously

suggested. This is the best path forward to ensure that CARB staff can conclude that the technical methodology operates accurately and thus the 2024 SCS accurately quantifies the GHG emission reductions, which are both necessary in order for CARB to be able to accept SCAG's determination that the region achieves the GHG reduction target.

If you have any questions or would like to discuss further, please do not hesitate to contact me at annalisa.schilla@arb.ca.gov or 279-208-7204.

Sincerely,

A handwritten signature in black ink, appearing to read "Annalisa Schilla". The signature is fluid and cursive, with the first name "Annalisa" written in a larger, more prominent script than the last name "Schilla".

Annalisa Schilla, Ph.D., Assistant Chief, Sustainable Transportation and Communities Division

cc: Steven S. Cliff, Ph.D., Executive Officer
Sydney Vergis, Ph.D., Deputy Executive Officer