

July 12, 2021

Ms. Marjie Kirn, Executive Director
Santa Barbara County Association of Governments
260 N. San Antonio Road Suite B
Santa Barbara, California 93110
MKirn@sbcag.org

Dear Ms. Kirn:

California Air Resources Board (CARB) staff appreciates the opportunity to review and engage with the Santa Barbara County Association of Governments (SBCAG) staff on the draft update to its Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) known as "Connected 2050." 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 in September 2020 to redouble the State's efforts to reduce GHG emissions, explicitly focusing 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 SBCAG's work as we endeavor together to achieve these shared goals.

In reviewing the draft 2021 RTP/SCS, CARB staff looked to identify whether additional information would be needed to conduct its final SCS GHG evaluation under SB 375. As discussed in meetings with SBCAG staff in September 2020 and March 2021, for all third round RTP/SCSs, like Connected 2050, CARB staff will focus on assessing whether SCS GHG reductions are reasonably supported by the plan. CARB staff will conduct its final evaluation, as outlined in the *Final Sustainable Communities Strategy Program and Evaluation Guidelines* (SCS Evaluation Guidelines) and requests that as SBCAG finalizes and adopts its 2021 RTP/SCS that it provides the following additional information.

2020 GHG Emission Reduction Target

State law requires CARB to provide 2020 GHG targets and MPOs to develop an SCS that achieves the GHG targets approved by CARB.² Given that 2020 is a specific milestone in SB 375, CARB staff expect that MPOs will continue to monitor, and report observed data as it relates to that target in the SCS. As part of the SCS submittal, CARB staff will need further information on SBCAG's 2020 target determination. Consistent with the SCS Evaluation Guidelines, SBCAG could compare available observed data with performance indicators to

¹ CARB's [2018 Progress Report: California's Sustainable Communities and Climate Protection Act](#).

² Senate Bill 375 (Statutes of 2008, Chapter 728). Sections 65080(b)(2)(A) and 65080(b)(2)(B).

understand whether the region is moving in a direction consistent with the SCS's planned outcomes to meet the 2020 target. If, based on this evidence, the region is not meeting its 2020 targets, SBCAG should identify what adjustments and changes the region has prioritized in the SCS to get the region on track to achieve its 2020 target when it is reasonably practical.

SCS Strategies to Reduce GHG Emissions

Clarify for each SCS strategy what SBCAG staff is assuming regarding the applicable geographic scope, with specific locations if known; the implementation timeframes; and what measurable actions and investments SBCAG and its member agencies will make to support and track SCS 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 draft 2021 RTP/SCS strategies:

- Land Use: The draft 2021 RTP/SCS assumes land use related strategies that focus future growth within existing urbanized areas and avoid resource areas identified in the Regional Greenprint. However, the draft 2021 RTP/SCS at Chapter 3, page 12, states, "Whether, when and how to implement the RTP-SCS preferred scenario is solely up to each SBCAG member jurisdiction to decide through its local land use planning processes. Land uses assumed in the RTP/SCS preferred scenario do not represent a commitment or intention by any SBCAG member jurisdictions to implement them." While CARB recognizes that local governments have authority to control land use within their jurisdictions, CARB requests evidence of policy, funding, or technical assistance commitments from SBCAG and its local member jurisdictions that support the projected land use assumptions and strategies assumed in the draft 2021 RTP/SCS.
- Enhanced Transit: From the strategy discussion in the draft 2021 RTP/SCS at Chapter 3, page 34-35, it is not clear to CARB staff if SBCAG is taking credit for the Enhanced Transit strategy based on projects that are beyond what is included in the fiscally constrained project list, or that are part of the modeled transportation network for the 2021 RTP/SCS preferred scenario modeling. If SBCAG is seeking credit for this strategy based on projects that are outside what is in the fiscally constrained project list, SBCAG needs to provide CARB staff with its quantification method, the list of associated projects being assumed, and associated policy commitments. SBCAG should also identify where the forecasted funding of \$204 million towards this strategy is expected to come from.
- Electric Vehicle Infrastructure: The draft 2021 RTP/SCS at Chapter 3, page 38, indicates it will be taking credit for GHG reductions associated with a recent California Energy Commission California Electric Vehicle Infrastructure Program grant. SBCAG should confirm and clarify that it is only seeking GHG emission reduction credit for reductions associated with the local match fund portion of this project. SBCAG should also provide additional supporting information on what assumptions are being used regarding implementing this strategy, including scope of proposed installation sites to

ensure the chargers are fully utilized (i.e., not installed in industries that participates in the telework strategy), and the assumed installation timeline.

- **Telework:** The draft 2021 RTP/SCS at Chapter 3, page 38, also indicates SBCAG will be assuming increased telework as a strategy that reduces VMT. SBCAG should provide additional supporting data or references for its key assumptions of 50-80 percent participation at 2-4 days of remote work per week.

Strategy Funding and Revenues

The draft RTP/SCS at Chapter 5, page 2 states, "The total amount of revenue anticipated from federal, state, regional, and local sources over the life of Connected 2050 is approximately \$11.3 billion. The total cost of the projects in Connected 2050 is approximately \$8.2 billion." CARB staff would like to better understand from SBCAG staff the reason for this difference in projected revenue and project costs, as well as which SCS strategies rely on investment of this projected revenue for implementation.

Induced Travel Impacts

The draft RTP/SCS at Chapter 2, page 42, lists the inclusion of a few roadway capacity expansion projects. However, it is unclear from the draft RTP/SCS how SBCAG has considered the impacts of road expansion projects on short- and long-run induced travel in the region. SBCAG should document its quantitative analysis of induced travel and how results were incorporated into its RTP/SCS's associated VMT and GHG estimates, along with supporting information such as maps showing the locations of regional road expansion projects compared to anticipated growth areas.

CARB staff are committed to working with SBCAG staff on potential approaches to address these requests and offer remedies, where applicable. It would be helpful to receive the identified information before the 2021 RTP/SCS adoption, so that we have an opportunity to discuss any further issues.

We look forward to continuing our collaboration with SBCAG. If you have any questions, please contact me at Lezlie.Kimura@arb.ca.gov, or my staff, Lana Wong, at Lana.Wong@arb.ca.gov.

Sincerely,

Lezlie Kimura Szeto
Lezlie Kimura Szeto, Manager

Sustainable Communities Policy and Planning Section

cc: See next page.

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cc: Michael Becker, Director of Planning, SBCAG
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