

August 23, 2023

Sarah Jepson, Chief Planning Officer  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 700  
Los Angeles, CA 90017  
[jepson@scag.ca.gov](mailto:jepson@scag.ca.gov)

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

Dear Ms. Jepson:

California Air Resources Board (CARB) staff received Southern California Association of Governments (SCAG) Senate Bill 375 (SB 375) Draft Technical Methodology (draft TM) on August 2, 2023, pursuant to requirements under California Government Code §65080 (b) (2) (I) (i). Given SCAG staff's request that CARB identify items by August 23, 2023, that should be addressed prior to the release of the draft SCS, CARB staff conducted an expedited preliminary review of the draft TM. Within SCAG's requested review timeline, we have been able to identify a number of questions and concerns. A detailed discussion of these topics grouped by severity of concern, along with CARB's specific concerns and suggested remedies, are included in Attachment 1.

Please follow up with CARB staff on how SCAG will address these items prior to publicly releasing quantification of these SCS strategies in order to avoid circulating inaccurate estimates of GHG emissions. Further, the information requested is ultimately needed for CARB to evaluate the final SCS. For CARB to accept or reject SCAG's final determination on whether it achieves the GHG emission reduction target, CARB staff have to be able to accurately evaluate the SCS actions planned for implementation and accept the GHG emission reductions being quantified. If CARB staff is unable to do so, CARB will not be able to accept SCAG's determination that its SCS would meet the greenhouse gas emission reduction target.

It is critical that CARB staff and SCAG staff reach agreement on SCAG's Technical Methodology as soon as possible to avoid the risk of quantification issues arising during CARB's final SCS review. Issues with quantifications that leave CARB staff unable to accept SCAG's determination as to whether its SCS meets GHG emission 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 §65080 (b) (2) (H), and/or ineligibility for certain State transportation funds.

CARB staff appreciate that SCAG staff shared a preliminary draft of the TM with CARB in February for initial feedback. However, it was missing a significant amount of information. On March 16, 2023, CARB staff provided some feedback, but noted that we were unable to provide substantial comments and encouraged SCAG staff to formally submit a complete draft TM as soon as possible. This draft TM is more complete; however, it is being provided to CARB within weeks of SCAG's draft 2024 RTP/SCS being prepared for public release. It will be extremely challenging for both CARB and SCAG to resolve these significant concerns prior to SCAG's planned release of the draft plan. In the next SCS, please provide a complete Technical Methodology before public engagement activities start and well in advance of the draft plan preparation as required by California Government Code Section § 65080 (b) (2) (I) (i), so that there is ample time for review and revisions before a draft plan is released.

CARB staff is available to provide technical assistance and answer any questions that you may have about these comments or any other issues on which we can offer assistance in support of SCAG's 2024 SCS development process. If you have any questions, please contact me at [carey.knecht@arb.ca.gov](mailto:carey.knecht@arb.ca.gov).

Sincerely,

/s/

Carey Knecht, Chief  
Transportation Systems Planning Branch

Attachment

cc: (via email)

Hsi-Hwa Hu, Modeling and Forecasting Manager  
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