

**Air Resources Board
Staff Report
SB 375 Greenhouse Gas Emissions Reduction Target Update Process**

October 2014

California Environmental Protection Agency
 **Air Resources Board**

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I. Executive Summary

The Sustainable Communities and Climate Protection Act of 2008, also known as Senate Bill (SB) 375, is intended to encourage regional planning that integrates land use and transportation policy in a way that reduces greenhouse gas (GHG) emissions from driving. The Air Resources Board (ARB or Board) is responsible for establishing and periodically updating GHG emissions reduction targets (targets) for the urban regions of California, which must strive to achieve the targets through land use and transportation planning efforts. The program, now in its sixth year of implementation, has resulted in regional plans, known as Sustainable Communities Strategies (SCS). SCSs, which are developed through public participation and consensus building, reflect more sustainable development and transportation investment priorities than in the past. These SCSs show that, if implemented, the major metropolitan regions of California can reduce transportation-related GHG emissions compared to the status quo, thereby contributing to achievement of the State's broader climate goals.

The Board established the original regional targets in 2010 for each of the 18 metropolitan planning organizations, or MPOs. The Board is required to update the targets at least every eight years, and may revise them every four years. In early 2014, the Board directed staff to engage in public outreach on a methodology for updating the targets and return to the Board in the fall of 2014 with a recommended path for updating targets. Based on ARB staff's experience to date in reviewing SCSs, discussions with the Board about its goals for the SB 375 program, and public and stakeholder outreach about a process for updating the targets, staff has developed this report recommending a process to update the targets.

There are two primary areas of consensus among stakeholders: focus on implementation of the current plans that the MPOs have adopted, and the need for additional funding in sufficient amounts to support SCS implementation. While staff proposes to conduct a public process in 2015 to develop updated targets for future SCSs, parallel efforts to secure adequate resources for local planning and project development must be a priority. The success of any target updates and new planning rests on implementing the current plans so that the MPOs can meet their first SB 375 milestone in 2020. Therefore, staff recommends that the Board update the 2035 targets while continuing to support MPOs to meet their existing 2020 targets. Planning for the 2020 targets is essentially done at this time and implementation is the priority.

Transportation planning is an ongoing process, and the timing of updated targets needs to be phased to allow the MPOs to plan effectively. Therefore, staff recommends updating the targets according to the following timeline for three main groupings of MPOs. In late 2015, update the 2035 targets for the four large MPOs, but make these

targets effective for their SCSs starting in 2019. During 2015, staff would work with these MPOs as they develop alternative land use and transportation scenarios that would form the basis for their target recommendations to the Board. Staff's evaluations of the current SCSs for the eight Valley MPOs are underway now and will continue into 2015. There are quantification issues that staff and the Valley MPOs need to work through, including interregional travel, that will take time. Because staff expects this evaluation of the current plans will provide data to inform updated targets, staff recommends bringing proposed updated 2035 targets for the Valley MPOs to the board in 2016. These would apply to their SCSs starting in 2018. For the six smaller MPOs, the current targets for these MPOs do not reflect the GHG emissions reduction benefits shown in their current SCSs. To resolve this, staff proposes to update the 2020 and 2035 targets for the six small MPOs, also in 2015. These targets should be consistent with the reductions that were achieved by their first SCSs, and would be effective for their next SCSs.

The SB 375 program has resulted in many positive changes in how California plans for the future. The SCS planning process has helped increase regional coordination; provided a framework for better planning and decision-making; and has the potential to improve public health, increase mobility, improve air quality, and conserve natural resources as co-benefits in addition to GHG emissions reductions. Staff proposes to include, as part of the target update, discussion about how these benefits can be quantified and included in the SCS development process.

Technical issues such as modeling assumptions and technology measures will require ongoing work with all MPOs throughout 2015. Staff will work with the MPOs to establish more consistency in the approach that MPOs use to develop the key assumptions in their travel models, such as auto-operating costs and socioeconomic forecasts. In addition, MPOs are important partners in deploying new transportation technologies, and for this reason, they should be encouraged to include actions in their plans that support the State's vehicle technology goals. Nevertheless, the primary focus of the plans must continue to be on meaningful contributions from land use and transportation strategies.

Ongoing collaboration between ARB, MPOs, and stakeholders will also need to continue on other issues as work on the target update proceeds. These include a methodology for quantifying interregional travel, developing tools to estimate the expected co-benefits of SCS implementation, increasing the consistency in the way that regional travel models are validated and peer reviewed, and establish a forum for MPOs to share best practices for SCS development. ARB staff will work with MPOs, the Governor's Office of Planning and Research (OPR), the Strategic Growth Council

(SGC), the California Department of Transportation (Caltrans), California Association of Councils of Governments (CalCOG), and other technical experts on these issues.

II. Introduction

California's transportation system accounts for about 36 percent of California's GHG emissions. Passenger vehicles alone contribute 26 percent of California's total GHG emissions.¹ The Sustainable Communities and Climate Protection Act of 2008 (SB 375; Steinberg, Chapter 728, Statutes of 2008) supports the State's climate action goals to reduce GHG emissions through coordinated transportation and land use planning. SB 375 aims to integrate regional transportation planning with land use planning in a manner that reduces GHG emissions from passenger vehicles, and introduced the SCS as a component of the regional transportation plan (RTP).

The *First Update to the Climate Change Scoping Plan* indicates that GHG emissions reductions are needed from many possible paths in the transportation sector, including changes to land use that reduce vehicle miles traveled (VMT) and changes in technology that reduce emissions from vehicles. SB 375 is identified in the Scoping Plan as one of the mechanisms for achieving the State's GHG emissions reduction goals.

SB 375 requires ARB to adopt targets for each of the State's MPO regions. The original targets were developed through an 18-month-long collaborative process that involved input from the Regional Targets Advisory Committee (RTAC), the MPOs, and numerous other stakeholders. The RTAC submitted its recommendations to ARB in a report in 2009.² In late 2010, ARB provided each affected region with targets for GHGs emitted by passenger cars and light trucks for 2020 and 2035. The targets are just one performance measure used to evaluate an MPO's federally required RTP.

MPOs are responsible for selecting the appropriate combination of GHG emissions reduction strategies for their RTP/SCSs but the responsibility for implementing those strategies remains with the local land use authorities—the cities and counties. ARB is responsible for reviewing an MPO's determination that its SCS, if implemented, would achieve its assigned targets. Factors that ARB staff consider when evaluating an

¹ California Air Resources Board. 2014. California Greenhouse Gas Inventory for 2000-2012. http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-12_2014-03-24.pdf

² Regional Targets Advisory Committee. 2009. Recommendations of the Regional Targets Advisory Committee (RTAC) Pursuant to Senate Bill 375. <http://www.arb.ca.gov/cc/sb375/rtac/report/092909/finalreport.pdf>.

MPO's determination of target achievement are described in its technical methodology report.³ To date, ARB staff has reviewed the final determinations of eight MPOs. At the time of this writing, adoption of the first round of RTP/SCSs by MPOs is nearly complete, and the second round of RTP/SCS planning is already underway in certain regions of the State.

When the Board established the targets, it directed staff to provide an update in four years to review the progress of target implementation and discuss the need for updating the targets to reflect new data, modeling improvements, and other information relevant to targets. In January 2014, ARB staff provided the Board with one of several briefings on the status of SB 375 implementation. At that time, the Board directed staff to conduct additional public outreach with stakeholders on a methodology for updating the targets, and return to the Board in the fall of 2014 for further discussion about a preferred approach for updating the targets.

Staff has conducted a series of public outreach activities since January 2014. In April 2014, staff convened a roundtable meeting of stakeholders that included former members of the RTAC as well as program experts from State agencies. The purpose of the roundtable meeting was to help explore issues related to target-setting and to think strategically about appropriate methodologies for updating the targets.

A preliminary draft staff report was published in August 2014 that identified a range of issues raised through discussions with MPOs and stakeholders, and served as a backdrop and discussion tool for a series of four public workshops and a second roundtable meeting in September. Among the issues addressed were:

- Whether to update the targets assigned to each MPO;
- Whether to update the 2020 target, or focus on the 2035 target;
- When any updated targets should take effect;
- How updating the targets can promote other co-benefits through SCS development and implementation;
- How to improve MPO modeling tools and input data and achieve greater consistency in their input assumptions; and
- How to account for emissions reductions due to local or regional actions that support technological advances in the vehicle fleet.

³ California Air Resources Board. 2011. Description of Methodology for ARB Staff Review of Greenhouse Gas Reductions from Sustainable Communities Strategies (SCS) Pursuant to SB 375. http://www.arb.ca.gov/cc/sb375/scs_review_methodology.pdf

This staff report presents staff's recommendations based on this public input process.

III. Recommendations

The following are staff's recommendations on the timing and process for target updates, and several technical issues relevant to updating the targets.

A. Timing and Process for Target Update

The 18 MPOs can be grouped into three categories, which, for various policy and technical reasons, should be addressed separately in terms of when their targets should be updated. Staff recommends updating the targets for the four largest MPOs and the six smaller MPOs in 2015 and for the eight San Joaquin Valley MPOs in 2016.

The four largest MPOs (San Diego Association of Governments [SANDAG], Southern California Association of Governments [SCAG], Sacramento Area Council of Governments [SACOG], and Metropolitan Transportation Commission [MTC]), are currently focusing their resources on implementing their first SCSs and all of them are in various stages of developing their second SCSs.

MPOs typically conduct testing of various scenarios to compare the relative GHG emissions benefits using their transportation models and other modeling tools. In 2010, the MPOs made their target recommendations to ARB based on these types of analyses. In 2015, staff proposes a similar process to work with these MPOs on the necessary scenario analysis underpinning the target recommendations. Staff would present the Board with target recommendations in 2015 that would apply to the SCSs for SANDAG, SCAG, SACOG and MTC starting in 2019. Updating the targets for the large MPOs concurrently will allow for data and information sharing among the MPOs as scenarios are developed. This type of data-sharing was very helpful during the initial target-setting process.

In general, limited technical data was available on which to base target recommendations for the remaining MPOs. For the San Joaquin Valley MPOs, ARB established placeholder targets in 2010 with the expectation that the targets would be revised once transportation model improvements were completed and alternative scenario analyses could be provided. Their model improvements were completed in 2013 for use in their 2014 RTP/SCSs. ARB staff's evaluations of the first SCSs from these MPOs are underway now and will continue into 2015. Staff expects this process will provide the quantification needed to inform updated targets. Therefore, staff proposes returning to the Board in 2016 with 2035 target recommendations for the eight San Joaquin Valley MPOs that would apply to their SCSs scheduled for adoption in mid- to late 2018.

The six smaller MPOs have modest targets, some as low as zero and one whose targets allow an increase in per capita emissions relative to 2005. Their targets were largely based on the GHG emissions reductions expected from the RTPs in place at the time of initial target-setting. Their 2020 and 2035 targets should be updated to be consistent with the GHG emissions reductions that were achieved by their first SCSs. By spring 2015, all of the smaller MPOs will have adopted their first SCSs, and the performance of their SCSs in reducing GHG emissions will be known. Staff proposes returning to the Board in 2015 with 2035 target recommendations for the smaller MPOs, and making these updated targets applicable to their next SCSs, the first of which is scheduled for adoption in late 2016. To avoid any inconsistency between the current targets and their first SCSs, staff proposes to update the 2020 targets for these six MPOs as well as their 2035 targets.

Finally, numerous SCSs already plan for a horizon year of 2040 or beyond. Some stakeholders have requested that ARB provide guidance to MPOs on emissions reduction goals beyond 2035. Although SB 375 only directs ARB to set targets for 2020 and 2035, the Board has already expressed its expectation that an SCS should demonstrate sustained reductions beyond 2035.

ARB's First Update to the Climate Change Scoping Plan, approved in May 2014, recommends the establishment of a mid-term statewide emissions target that aligns with the State's long-term objective of continued emissions reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050. The establishment of a statewide mid-term emissions target could inform SB 375 target-setting for 2035.

B. Technical Issues

The existing Board-adopted targets are expressed in percent reduction in per capita GHG emissions relative to 2005. The Board selected the currently-adopted metric because it is simple, easily understood by the public, can be developed with currently available data, and is equitable to both fast and slow growth regions. Staff believes the current metric has worked well. Furthermore, technical modeling experts expressed the view that the 2005 base year represents a point of economic and regulatory consistency or stability.

Model input assumptions are a necessary part of running a transportation model. The target-setting process needs to recognize the VMT and GHG emissions reduction benefits from changes in market trends and behavioral change, such as attitudes about where people choose to live and how they choose to get around. Evidence about changes in demographics, employment, and educational trends that support sustainable communities must be considered and built upon in the SCS process. ARB staff will work with all MPOs to establish more consistency among the factors used to develop

key assumptions that are input into their travel models, such as auto-operating costs and socioeconomic forecasts.

Auto-operating cost is a critical input to a transportation model and affects modeled travel behavior and VMT estimation. Each MPO has its own methods for determining auto-operating cost. Some MPOs base auto-operating cost solely on fuel price, others include maintenance and insurance as part of auto-operating cost. Fleet fuel economy also needs to be factored into the calculation of auto-operating cost, because as fleet fuel economy improves, auto-operating cost declines. While each MPO may have varied assumptions for fuel price, there are common factors that should be considered when determining auto-operating cost. ARB staff will work with MPOs to develop a consistent set of factors to determine auto-operating cost, including fuel price, maintenance, insurance, and fuel economy.

Socioeconomic conditions such as employment, population, housing forecasts, and vehicle ownership are input parameters into transportation models that affect travel behavior and VMT output. ARB staff will encourage MPOs to consider and draw from a recognized set of data sources, and would like to collaborate with the MPOs to develop a consistent approach to the socioeconomic forecast. This will help ARB staff to better understand the impact of land use and transportation strategies on VMT and GHG emissions.

SB 375 requires ARB to take into account GHG emissions reductions that will be achieved by improved vehicle emissions standards, changes in fuel consumption, and other measures it has approved that will reduce GHG emissions in the affected regions. Some stakeholders expressed concern over the extent to which MPOs may rely on MPO-actions that accelerate implementation of State level vehicle programs (e.g., Advanced Clean Cars [ACC], plug-in electric vehicles [PEV], zero-emission vehicles [ZEV]) for meeting the targets. However, MPOs can play an important supporting role by locally implementing more aggressive or accelerated programs (e.g., allocate transportation system funding for PEV charging infrastructure; road pricing and congestion management policies to incentivize ZEV/PEV ownership).

Staff will encourage MPOs to provide more detailed information about the types of strategies that underlie the scenario planning and MPO target recommendations discussed in the earlier section. This way, staff and the Board can better assess the relative contribution of land use and transportation planning strategies to GHG emissions reductions, as compared with strategies that accelerate changes in technology when the targets are updated. This approach is intended to strike an appropriate balance between encouraging innovative strategies from MPOs to seek GHG emissions reductions from every eligible source, but still emphasize the land use and transportation strategies that afford numerous other co-benefits.

IV. Ongoing Stakeholder Engagement

As discussed in the previous section, some technical and methodological issues pertinent to the target-setting process are especially complex, and the analytical tools to better-evaluate these issues, such as estimation of co-benefits and interregional travel, are still under development. There are also opportunities to increase data-sharing among regions. Throughout 2015, ARB staff will continue to convene focused stakeholder and technical working group meetings on these key issues at appropriate milestones during the target update process. These focused topics include:

- Development and use of tools to estimate the potential for community co-benefits of SCS implementation,
- Quantifying interregional travel and effective SCS planning for interregional trips,
- Increasing consistency in transportation model validation and peer review, and
- Identifying and sharing best practices among the regions.

Representatives from OPR, Caltrans, and SGC will be encouraged to actively engage in these issues.

A. Tools to Estimate Co-Benefits

As discussed earlier in this report, ARB staff recommends an approach to help maximize community and environmental co-benefits (e.g., public health, mobility options, resource conservation) as part of the target-setting process. ARB staff will work with MPOs to provide information during the scenario planning stage on the associated co-benefits, such as improved public health. However, MPOs need tools, metrics, and methods to better-estimate co-benefits of SCSs. A variety of tools are currently being used or are under development to quantify co-benefits of land use and transportation planning strategies, but the ability of these tools to quantify co-benefits is limited, and there is no standardized use of any tools or metrics across the State. ARB staff will host discussions with interested stakeholders, SGC, non-governmental organizations, and others to advance the development of tools, metrics, and methods for estimating co-benefits of SCS implementation. For example, SGC is working to develop a tool that regional and local agencies can use to measure public health benefits of land use and transportation strategies.

B. Interregional Travel

Better tools and data to account for interregional travel are needed, and staff is working with the MPOs, modeling experts, and Caltrans to understand how interregional travel is currently estimated, and is planning to explore alternative methodologies that could be used in future SCS development.

As discussed previously, RTAC provided recommendations to ARB on allocation of VMT to MPOs. RTAC recommended that VMT from internal trips be attributed at 100 percent, VMT from trips that originate or terminate within an MPO would be discounted by 50 percent, and VMT from “pass-through” trips that do not originate or terminate in the MPO would be excluded. This method attempts to recognize that an MPO has more ability to influence distance and mode for a local trip than for an interregional trip, and has very limited ability to influence a pass-through trip. This methodology was not necessarily followed by all MPOs. Instead, most MPOs have included 100 percent of interregional VMT (excluding pass-through trips) up to their MPO border.

Interregional VMT varies dramatically between small (single-county) and larger MPOs. For example, an internal trip within the SCAG region may be 200 miles long, and never leave the MPO boundary. However, a much shorter trip from San Joaquin County to Stanislaus County is considered an interregional trip. The methodology for interregional travel should consider the fact that MPOs are both large and small.

Transportation models have limited capabilities to characterize the full vehicle trip length once the trip leaves the MPO boundary. ARB staff is investigating the issue of interregional travel, and has convened a working group of transportation modeling experts. The working group has discussed how interregional travel is currently estimated, and is beginning to examine approaches to getting better estimates of the amount of interregional travel. This working group has met three times and has agreed to continue meeting to discuss these technical issues and their policy implications. ARB staff will continue to be involved with the working group to investigate the availability of statewide modeling tools to help address this issue.

The updated version of the California Statewide Travel Demand Model (CSTDM) has the potential to offer important information on interregional travel. The CSTDM was officially released by Caltrans on October 1, 2014, and the model will be accessible to MPOs and the public to extract baseline data on interregional travel. It will take some time for the MPOs to become familiar with this complex activity-based model and to use it to forecast interregional travel. Caltrans plans to establish advisory committees (one policy and one technical) with MPO representation, to assist users of the CSTDM. Eventually, the model may become a viable tool for better interregional travel estimation, once it is tested, accepted, and made operational by the MPOs for this purpose. ARB is working with Caltrans to install a copy of the CSTDM on ARB computers, and will be running the model as part of this effort.

C. Model Validation and Peer Review

Transportation model validation is critical for estimating VMT upon which GHG emissions are based. The issue has come up through the course of ARB staff’s reviews

of SCSs. ARB staff already works with MPOs to conduct sensitivity tests of their transportation models, and peer review of models is already recommended pursuant to the California Transportation Commission (CTC) Guidelines. The level of peer review and ability to conduct rigorous sensitivity testing can vary due to limited availability of staff resources for some MPOs. ARB staff would like to work with the MPOs to increase consistency in their model validation and peer review processes, and develop a more standardized list of sensitivity tests that MPOs would conduct for purposes of ARB's evaluation.

D. Identifying and Sharing Best Practices

The experiences of the MPOs in developing their first SCSs provide useful lessons that can be applied to future SCS planning to promote SCS implementation. This includes both procedural practices, and innovative land use and transportation strategies that the MPOs are incorporating into their SCSs. As part of ARB staff's ongoing efforts to engage stakeholders at key milestones in the target update process, this process will include a forum for MPOs and non-governmental organizations to discuss sharing of information, including but not limited to, best practices and lessons learned.

V. Next Steps and Future Implementation

A. Resources for Implementation

ARB will continue to work with MPOs and State funding agencies throughout the target update process to identify necessary resources for SCS development and implementation. MPOs and local governments need funding in sufficient amounts to support SCS implementation and achievement of targets. Traditional sources of funding for transportation infrastructure are not sufficient to fully realize the benefits of adopted SCSs. MPOs need resources to invest as early as possible to achieve their GHG emissions reduction targets.

The fiscal year 2014-15 State budget dedicates \$130 million in cap-and-trade proceeds for implementation of affordable housing and sustainable communities projects. These projects may include capital facilities projects normally proposed in SCSs. The State budget also allocates \$25 million for transit and inter-city rail projects, \$25 million to low carbon transit, and \$200 million to low carbon transportation. Pursuant to SB 535 (de León, Chapter 830, Statutes of 2012), a certain portion of the funds must be directed to benefit disadvantaged communities, which will benefit smaller communities as well as larger metropolitan areas. All of these funding sources will support achievement of the goals of SB 375 through sustainable planning and technology improvements.

B. MPO Target Recommendations

SB 375 gives MPOs the opportunity to recommend targets for their region. During the initial target-setting process, many of the MPOs provided ARB with recommendations for their respective targets. ARB staff supports a similar process for the target update.

The collaboration process between the MPOs, ARB, and local jurisdictions is critical for the success of the SCSs because MPOs do not have land use authority. Consensus between MPOs and local jurisdictions on the preferred land use and transportation strategy to achieve the GHG emissions reduction target is necessary, because the local governments ultimately play a major role in implementing the SCSs. Successful collaboration between MPOs and local governments will promote continued and sustained GHG emissions reductions beyond 2035.

Much interest has been generated around the target numbers, but the land use and transportation strategies that underpin the SCSs are equally important to assess the ambitiousness of the plans. MPOs should support their target recommendations by providing technical information on the types of SCS strategies that would be necessary to achieve those targets. This would provide the Board with an opportunity to review the potential SCS strategies before establishing updated targets for a region.

C. Public Outreach

ARB staff will meet with stakeholders at key milestones in the target update process to discuss specific technical issues. Public workshops should be held to receive input from stakeholders and the public before making any recommendations to the Board on updated targets. The results of the information exchange and scenario planning with the MPOs will be made a part of this public dialogue. Once staff is ready to propose updated targets, stakeholders and the public will be provided an opportunity to comment on the proposed targets before they are considered for adoption by the Board.

D. Environmental Analysis

In 2010, ARB, as the lead agency for the target-setting process, prepared an environmental document to comply with the California Environmental Quality Act (CEQA) entitled the *CEQA Functionally Equivalent Document (2010 FED)*.⁴ The 2010 FED provided a programmatic level of analysis of the potential indirect environmental impacts associated with the establishment of the regional targets. This analysis was based on the reasonably foreseeable actions associated with the implementation of SCSs designed to achieve the regional targets. The 2010 FED was circulated to the

⁴ Prepared under ARB's CEQA certified regulatory program (PRC 21080.5; 14 CCR 15251[d]). *CEQA Functionally Equivalent Document*. http://arb.ca.gov/cc/sb375/fed_sb375_080910.pdf

public and other agencies for review and comment. Following the comment period, ARB staff responded in writing to all comments on the environmental analysis.⁵ As part of the final action on the targets, the 2010 FED was certified, the written responses were approved, and findings and a statement of overriding considerations were adopted.

For the target update process, ARB staff will evaluate whether a supplemental environmental analysis to the 2010 FED is required.⁶ Staff will be better-able to make a determination on the level of environmental review required once the preliminary target recommendations are known. If a supplement to the 2010 FED is prepared, it will be circulated for public review and comment before Board action on any proposed updated targets. The environmental review process, including public review and preparing written responses to comments, can take six to eight months to complete.

VI. Summary of Recommendations

The Board should continue to work with MPOs and State funding agencies throughout the target update process to identify necessary resources for SCS development and implementation. Investments need to be made as soon as possible to put the regions on a path toward meeting their 2020 targets. Plans that are successful in 2020 are prerequisite to success in 2035 and beyond. It is essential that sufficient resources be available for MPOs and local governments to successfully implement their SCSs.

MPOs provided target recommendations to ARB based on alternative land use and transportation scenario testing in 2010. This process worked well and will be important to continue in the target update. In 2015, staff proposes a similar process supported by information from the MPOs on the co-benefits of their potential SCS strategies. Staff recommends updating targets for the largest four MPOs in late 2015. The updated targets would apply for the SCSs in these regions starting in 2019. Targets for the eight MPOs in the San Joaquin Valley should be updated in 2016, to allow time for ARB to evaluate their first SCSs and to work through technical issues such as interregional travel. Updated targets for the San Joaquin Valley would be available in time to apply to their SCSs in 2018. Targets for the six smaller MPOs would be updated to be consistent with GHG emissions reductions achieved in their first SCSs, and would apply

⁵ Responses to public comments received on the 2010 FED were published in document entitled *ARB Responses to Public Comments on the Functional Equivalent Document (FED) for the Proposed SB 375 Regional Targets*. <http://www.arb.ca.gov/cc/sb375/response%20to%20fed%20comments.pdf>.

⁶14 CCR 15162.

to their second SCSs (beginning in 2016). The recommended timeline for updating the targets is summarized below in Table 1.

Table 1: Proposed Timing of Target Update			
	Four largest MPOs	Eight San Joaquin Valley MPOs	Six Small MPOs
Proposed adoption of target update	late 2015	late 2016	late 2015
Applicability of updated targets	starting in 2019	2018	starting in 2016

Public discussion among MPOs, stakeholders, experts, and State agencies, has been important to progress on complex issues. ARB staff will continue to convene those discussions periodically on focused topics, including better tools to estimate co-benefits, identification of a methodology for addressing interregional travel, increased consistency in model validation and peer review processes, and identification and sharing of best practices from the regions.

ARB staff will continue to meet with stakeholders, in a roundtable format, at key milestones in the target update process to discuss specific technical issues. Public workshops should also be held to seek input on proposed targets in 2015 and 2016 before they are presented to the Board for adoption.