

October 17, 2023

James Corless, Executive Director
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, CA 95814
jcorless@sacog.org

RE: CARB Review of Sacramento Area Council of Governments 2025 MTP/SCS Senate Bill 375 Greenhouse Gas Emissions Draft Final Technical Methodology

Dear Director Corless:

California Air Resources Board (CARB) staff received the Sacramento Area Council of Governments (SACOG) Senate Bill 375 (SB 375) draft final technical methodology (TM) on June 15, 2023, pursuant to requirements under California Government Code §65080 (b)(2)(I)(i). CARB staff have reviewed the TM and identified several 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 SACOG will address these items prior to publicly releasing quantification of the sustainable communities strategy (SCS) to avoid circulating inaccurate estimates of greenhouse gas emissions. It is critical that CARB staff and SACOG staff reach agreement on SACOG's TM as soon as possible to avoid the risk of quantification issues arising during CARB's final SCS review. The information requested is ultimately needed for CARB staff to evaluate the final SCS. For CARB to accept or reject SACOG's final determination on whether the region achieves the greenhouse gas emission reduction target, CARB staff will have to be able to accurately evaluate the SCS actions planned for implementation and accept the greenhouse gas emission reductions being quantified. If CARB staff are unable to do so, CARB will not be able to accept SACOG's determination that its SCS would meet the greenhouse gas emission reduction target, which 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.

Please note that SACOG's 2035 greenhouse gas emission reduction target is 19%. We expect SACOG to reach this target. Although the current evaluation guidelines allow metropolitan planning organizations (MPO) to round up if necessary to reach their targets, CARB staff will be re-evaluating this policy in coming years as part of discussions with MPOs and the public. CARB staff advise all MPOs to create SCSs that achieve their stated target and not assume that rounding will be allowed in the future.

CARB staff are 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 SACOG's 2025 SCS development process. If you have any questions, please contact me at carey.knecht@arb.ca.gov.

Sincerely,

/s/

Carey Knecht, Chief
Transportation Systems Planning Branch

Attachment

cc: (via email)

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