

February 3, 2025

Yanmei Ou, Data and Analysis Manager
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, California 95814
[YYou@sacog.org](mailto:YOu@sacog.org)

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

Dear Ms. Ou:

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 provided comments to SACOG on the TM in October 2023, and SACOG staff addressed many of these comments with supplemental documents sent to CARB in March and July 2024. However, there are still some issues remaining, which are outlined in Attachment 1 of this letter.

We recommend that SACOG staff share revisions and resolve these issues with CARB staff prior to publicly releasing the quantification of greenhouse gas (GHG) emission reductions attributed to the 2025 Sustainable Communities Strategy (SCS) to avoid circulating estimates of GHG emissions that CARB cannot accept. CARB staff would be happy to discuss with SACOG how to address these items if it is helpful.

In addition to issues with the technical methodology, CARB staff have separately identified strategy assumptions in the quantification formulas that SACOG will need to provide as part of the 2025 MTP/SCS. CARB staff will evaluate whether the assumptions are reasonable to conclude whether the TM operates accurately. CARB staff have separated these because we understand that this information is likely not available until further into SCS development. CARB staff request this information be provided as part of the draft MTP/SCS. This will facilitate CARB staff's timely review and help avoid the risk of quantification issues arising during CARB's final SCS review.

Outstanding issues with quantifications that leave CARB staff unable to accept SACOG's determination as to whether its SCS meets GHG emissions 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 Section 65080(b)(2)(I), and/or ineligibility for certain State transportation funds.

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CARB staff are available to provide technical assistance and answer any questions that you may have about these comments or any other issues in support of SACOG's SCS development process. If you have any questions, please contact me at Carey.Knecht@arb.ca.gov.

Sincerely,

/s/

Carey Knecht, Chief, Transportation and Land Use Planning Branch

Attachment

cc: Clint Holtzen, Planning Manager
Sacramento Area Council of Governments
choltzen@sacog.org