

August 8, 2025

James Corless
Executive Director
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, California 95814

Dear Executive Director Corless:

California Air Resources Board (CARB) staff appreciates the opportunity to review and engage with the Sacramento Area Council of Governments (SACOG) staff on the 2025 Blueprint, its draft 2025 Metropolitan Transportation Plan / Sustainable Communities Strategy (Draft SCS). Comprehensive planning that integrates land use and transportation to reduce greenhouse gas emissions is more important than ever. 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. The SACOG 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 diverse communities and provides clean air for its residents.

CARB staff have reviewed SACOG's Draft SCS to identify whether additional information would be needed to conduct our final SCS evaluation under Senate Bill (SB) 375, after SACOG adopts the final SCS. CARB staff's evaluation of the final SCS will focus on assessing whether SACOG's determination regarding the plan's ability to achieve its greenhouse gas (GHG) emission reduction targets is reasonably supported by the plan, as outlined in the [Final Sustainable Communities Strategy Program and Evaluation Guidelines](#) (SCS Evaluation Guidelines). For reference, the following comments are generally organized by the SCS evaluation components as described in the SCS Evaluation Guidelines, which can also be found in [CARB's SCS Submittal Package Summary Guide](#).

Although this letter is focused on policy analyses, it is important to note that CARB's evaluation of the final Metropolitan Transportation Plan (MTP)/SCS is predicated on the technical accuracy of GHG emissions quantification. Early in the SCS development process, SB 375 requires Metropolitan Planning Organizations (MPOs) such as SACOG to submit a technical methodology to CARB.¹ The MPO and CARB staff are then intended to work together until CARB staff conclude that the calculations and quantifications provided would yield accurate estimates of GHG emission reductions. As detailed in a separate letter provided to SACOG staff on August 8, 2025, CARB staff continue to have outstanding concerns about the technical methodology.

¹ Gov. Code, § [65080](#), subd. (b)(2)(J)(i).

It is critical that CARB staff and SACOG staff continue working together to reach an agreement on SACOG's technical methodology to avoid the risk of quantification issues arising in SACOG's final MTP/SCS. Issues with quantifications that leave CARB staff unable to accept SACOG'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) (I), and/or ineligibility for certain State transportation funds.

Strategy Commitments

CARB's evaluation of SACOG's final SCS determination will assess whether the SCS actions, investments, and commitments support the stated GHG emission reductions and whether there are any risks to achieving those reductions.

1. Policy analysis

Under the SCS evaluation process, CARB staff analyzes whether SCS strategies for meeting the GHG emission reduction targets are supported by key policies, investments, and other commitments to advance plan implementation. CARB staff's policy analysis is organized by four broad categories of strategies: Land Use and Housing, Transportation, Local/Regional Pricing, and New Mobility.

Below are the CARB staff's concerns about the GHG emission reduction strategies as discussed in the Draft SCS and the additional information needed to evaluate the SCS GHG emissions quantification upon final submittal to CARB. In reviewing the Draft SCS, CARB staff tried to identify any additional information that would be needed to evaluate whether the SCS includes sufficient actions and/or investments to support implementation of the strategies detailed in the Draft SCS. In addition, CARB staff looked for whether the SCS outlines the agencies responsible or the authority needed to support implementation of those strategies.

a) Land Use and Housing Strategies

The Draft SCS outlines ambitious goals to better integrate transportation and land use, with a focus on regional benefits. SACOG's June 15, 2023, technical methodology for the 2025 SCS identifies targeted infill and increased density in transit priority areas as a core GHG reduction strategy for land use. Chapter 5 expands on this with a vision for compact development, greater housing density, and a jobs-housing mix. Chapter 6 adds supporting policies, including:

- Advancing legislative and regulatory reform,
- Continuing Green Means Go,
- Encouraging local policy changes and monitoring,
- Aligning transportation and infrastructure investments, and

- Coordinating phased growth for complete communities.

These supporting policies are critical and some of the most challenging to implement. CARB staff recommends the final SCS include additional detail – such as planned actions, supporting investments, responsible entities, and any needed authorities - to support implementation for the following items.

Encouraging local policy changes and monitoring: CARB staff recommends identifying how local land use and housing policy changes and development is/will be monitored (e.g., at what scale, compared against what forecast, through what medium, how often), and who will be the responsible entity in the final SCS.² In addition, CARB staff recommends that the final SCS submittal include the latest available development monitoring data on the amount of development within the different SCS community types that has occurred since the 2020 SCS.

In addition, CARB staff recommends that SACOG consider including in the final SCS what it expects the formal urban service boundary to be in 2035 based on the adopted land use scenario as well as the expected physical boundary of developed land (the boundary of urban growth) in 2035. Specification of these boundaries, ideally including commitments by Local Agency Formation Commissions (LAFCOs), counties, transportation agencies, cities within the SACOG region, and other agencies, can further support the proposed growth pattern and the necessary regional coordination to achieve it.

Aligning transportation and infrastructure investments: CARB staff recommends SACOG include information identifying what policies or programs are, or will be, used to advance coordination of transportation and infrastructure investments that will support more compact development patterns with greater housing density and a mix of jobs and housing (e.g., in locations that will mitigate the risk of vehicle miles traveled (VMT) growth) and who will be the responsible entity in the final SCS.

Coordinating phased growth for complete communities: Implementation of the 2025 SCS land use strategy and achievement of the GHG emissions reduction targets depend on coordinated action across multiple jurisdictions and strong local jurisdiction support. SACOG's own analysis and the draft MTP/SCS note that existing local plans allow for significantly more housing and job growth than the region is projected to need. Attachment D4, *"Factors Considered in Updating the MTP/SCS Land Use Forecast,"* highlights that the projects used in the plan as most likely to be built within 20 years are those located in areas with lower VMT and those consistent with prior MTP/SCS and Blueprint plans.³

² Gov. Code, § 65080, subd. (d)(3)(H)

³ Note: CARB staff assumes the reference to "2012 MTP/SCS" in Attachment D4 is intended to be "2025 MTP/SCS." Please advise us if this assumption is incorrect.

However, CARB staff continues to have questions about SACOG's ability to steer development toward the areas identified for growth in the adopted scenario. Without concrete actions or funding commitments to prioritize these areas, especially in developing communities, excess capacity elsewhere and the ongoing addition of even more development capacity could result in the actual growth pattern diverging from the plan.

Therefore, CARB staff recommend that the final SCS strengthen policy Vibrant-6 includes more specific information on the actions, programs, or funding commitments that will improve the likelihood of development occurring within the plan's designated areas for growth in Developing Communities. CARB staff recommend that SACOG add a policy or action to coordinate and engage with jurisdictions on proposed greenfield developments to make clear the development timing and phasing, as well as the VMT reduction strategies of the SCS and how the proposed development could support or weaken SCS implementation. More broadly, CARB staff recommend that SACOG add a policy or action to secure commitments from local agencies to support SCS goals through their land use decisions. Documenting these efforts, including local agency participation and support for these efforts, will help demonstrate progress on implementing the land use strategy.⁴

b) Transportation Strategies

Funding priority for supportive projects: In the evaluation of the 2020 SACOG SCS, CARB staff recommended prioritization of transportation investments that advance SCS implementation and goals. Policy Vibrant-5 in Draft SCS discusses a similar policy for infrastructure investments. However, the policy and related actions do not have a timeline or deliverables. CARB staff recommends the inclusion of additional information in the final SCS with actions and/or investments to support implementation of the strategy, and information about the entities responsible or the authority needed to support implementation.

List of projects as assumed in the SCS quantification and calculations: The transportation project list included in the Draft 2025 MTP/SCS does not indicate for all projects what is assumed about the project by 2035 for SCS GHG emission impact quantification and policy analysis purposes. These project specifics, as elements of the modeling that show how SACOG proposes to meet its SB 375 target, are part of the SCS and should be submitted as part of the SCS materials. CARB staff recommends that SACOG's final SCS include additional project assumption information (e.g., the number of lanes for each segment, including "auxiliary" lanes), which lanes if any are managed and the characteristics of the lane management, the

⁴ SACOG must report on implementation of its most recently adopted SCS starting July 1, 2026. (Gov. Code, § 65080, subd. (d)(3)(H).)

timing for the project to come into operation, how these roads differ from existing conditions, which project number each lane addition refers to (for comparison between project mapping and project lists), whether projects involve work on the same segment of roadway across the plan period, and where to obtain additional information if needed). One way to achieve this would be to add additional columns to the draft project list with this information for each project, as appropriate.

c) New Mobility Strategies

The NextGen-1 policy for shared mobility, NextGen-3 for zero-emission vehicles, and NextGen-5 for intelligent transportation systems (ITS) mention multiple programs intended for use as SB 375 GHG reduction strategies, including local electric vehicle (EV) charging infrastructure, or supply equipment incentives; transportation system management/ITS projects; employer-based trip reduction strategies; bikeshare and carsharing programs; and mobility hubs. However, the Draft SCS does not have details about how these policies will be carried forward.

To enable CARB staff's evaluation of the SCS as well as for transparency and to build the public support and interest that will be required to achieve the ambitious rates of participation, mode shift, and VMT reduction that are forecasted in the off-model GHG calculations submitted to CARB in this Draft SCS, CARB staff recommends the inclusion of additional information in the final SCS with actions and/or investments to support implementation of these strategies and information about the entities responsible or the authority needed to support implementation.

Note that SACOG's overall work program for 2025-2026 does have some information about some of these strategies, such as bike sharing and mobility hubs. To focus CARB staff's analysis and understanding of these implementation actions as they relate to the GHG reduction strategies, CARB staff recommends that this information be included in the final SCS and submittal materials.

2. Investment analysis

Under the SCS evaluation process, CARB staff will evaluate whether the planned investments in the project list adopted with the 2025 SCS support the expected GHG emission reductions by 2035. CARB staff will also qualitatively assess the risk of delay in delivering projects that advance SCS goals based on assumed available revenue sources and other factors.

a) Analysis data

As part of our evaluation, CARB staff will analyze total investment by transportation category in the 2025 SCS compared to the 2020 SCS, investment by transportation category as a percentage of total plan investment for both the 2025 SCS and the 2020 SCS, and total investment by category for the 2025 SCS for the period before 2035 (2025 to 2035) and after 2035 (2035 to the horizon year of 2050). CARB staff

recommends that the final MTP/SCS submittal include the plan's summary spending data to allow these analyses. Further information on the transportation categories can be found in the CARB [SCS Submittal Package Summary Guide](#).

b) Funding through local-option county sales tax measures

Appendix B discusses funding of plan investments by 2030 with new Placer County and Sacramento County sales tax measures. Tax measures in both counties have been voted on in recent years, and both failed measures included project lists with transportation projects not slated for completion by 2035 in the 2020 MTP/SCS. The Placer County tax measure's project list included Placer Parkway (completion date not mentioned), which could, if passed, have disrupted the current draft plan's implementation since only a small portion of that facility is to be built by 2035 per the current Draft SCS. CARB staff recommend that SACOG consider adding a supporting action to the final SCS that addresses how these local tax measures could help implement the final SCS by prioritizing funding for transportation projects included in the plan that support mode shift, and only funding VMT increasing projects that are already in the plan based on the plan's assumed timing.

Conclusion

The comments in this letter identify initial policy issues and recommendations that are all critical to address prior to submission of the final SCS for CARB's review and determination. Please make supporting information available to CARB in the final 2025 MTP/SCS or technical appendices to aid our final evaluation. CARB staff looks forward to continuing our collaboration with SACOG staff and are committed to working together to address these issues so we can achieve the State's emission reduction goals that we are all working toward.

CARB's final evaluation and ultimate decision to accept or reject SACOG's determination that the 2025 SCS would achieve the GHG emission reduction target for 2035 will reflect a full review of the 2025 SCS, following the SCS Evaluation Guidelines, and is not limited by the issues, recommendations, or information requests contained in this letter. If you have any questions, please contact me at (279) 208-7841 or Carey.Knecht@arb.ca.gov.

Sincerely,

/s/

Carey Knecht, Chief, Transportation and Land Use Planning Branch for The California Air Resources Board

cc: See next page, without enclosures.

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