August 8, 2025

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

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

Dear Executive Director Corless:

The California Air Resources Board (CARB) received the Sacramento Area Council of Governments (SACOG) Senate Bill (SB) 375 (2008) draft technical methodology (TM) on June 15, 2023, pursuant to requirements under California Government Code Section 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. CARB staff provided comments to SACOG on the TM in February 2025, and SACOG staff sent the latest version of the TM on June 6, 2025.

CARB staff acknowledges and appreciates SACOG staff's engagement with CARB staff on the TM to date. While most issues CARB identified previously have been resolved, CARB staff continues to find outstanding issues with the induced travel demand calculations and assumptions as outlined in the TM for this SCS and is seeking additional information on the auto operating cost (AOC) value for 2050. These issues are detailed below.

We recommend that SACOG staff share revisions and resolve these issues with CARB staff prior to submitting the final 2025 Sustainable Communities Strategy (SCS) to avoid relying on estimates of greenhouse gas (GHG) emissions that CARB would not be able to approve as part of SACOG's determination. CARB staff would be happy to discuss with SACOG how to address these items if it is helpful.

Unresolved issues with the technical approach to quantifications could leave CARB staff unable to accept SACOG's determination as to whether its SCS meets GHG emissions reduction targets. As a result, the SCS may require revisions and further board approvals, require the development of an alternative planning strategy under California Government Code Section 65080(b)(2)(I), and/or lead to ineligibility for certain State transportation funds.

Here is a summary of the CARB staff's outstanding concerns on the June revised draft TM and the GHG emission quantification that is reflected in the Draft 2025 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). CARB's *Final Sustainable Communities Strategy Program and Evaluation Guidelines* (SCS Evaluation Guidelines) and

appendices provide additional context and guidance on technical issues and data needs for the technical methodology.

A. Induced travel demand calculations and assumptions

The TM proposes to exclude new lane miles from the long-term induced travel calculations if the lane miles are located in one of the following areas: (1) infill/low vehicle miles traveled (VMT) areas; (2) average or higher VMT areas where "SACOG's land use forecast has already accounted for long-term land use inducement;" or, (3) a flood plain where long-term land use change is precluded by State law. The proposed approach of excluding certain lane miles from the long-term induced travel calculations is not supported by any existing research that CARB staff is aware of. Studies show that induced travel results from multiple behavioral responses to added capacity, including increased trip-making, longer travel distances, and shifts in mode or time of travel, not just land use change, and occurs in all area types, including infill.

Furthermore, this approach is predicated on the idea "that long-term induced travel is the result of development in higher VMT parts of the region catalyzed by new road capacity," and that such effects are "at least partly captured and accounted for by SACOG's land use forecast." However, CARB is not aware of any existing research or literature that supports the idea that long-term induced travel is caused by a single factor, nor does the TM provide evidence that the land use forecast adequately captures all the long-term induced demand.

CARB's recent policy brief finds that expanding roadway capacity leads to a near one-to-one increase in VMT over the long term, regardless of location or existing land use assumptions. While sustainable land use strategies, such as higher residential densities, transit-oriented development, and mixed-use planning, can reduce household VMT, they do not eliminate the VMT generated by added capacity.

Remedy: CARB staff recommend modifying the long-term induced travel calculations to include all of the roadway expansion miles that are included in the plan and assumed to be built by 2035 or providing additional justification for the proposed approach for CARB staff's consideration. CARB staff further recommends providing a list of all the roadway expansion miles that are included in the plan by classification (Class 1, 2, and 3). This information is necessary for CARB to evaluate whether the TM can produce accurate estimates of GHG emission reductions in the 2025 SCS.

Consider also analyzing the full impact of induced travel demand from capacity-increasing projects that are assumed to be built by 2050 to support SACOG's determination in future SCSs of GHG emission reductions that continue to achieve its 2035 GHG emission reduction target through the last SCS in 2050. If SACOG needs technical assistance with the induced travel analysis methodology and/or estimating the VMT impacts of roadway expansion projects, please reach out to CARB staff.

B. AOC value for 2050

The TM provides the AOC value and supporting calculations for the 2020/2019 base year and for year 2035 but does not provide this information for year 2050.

Information request: CARB staff recommend modifying the TM to add the AOC value and supporting calculations for year 2050.

Finalizing the technical methodology

CARB staff offers to continue working together with SACOG staff to develop a TM that can produce accurate estimates of GHG emission reductions in the 2025 SCS. As a next step, CARB staff recommends that SACOG provide CARB staff with an updated TM that addresses the requested updates prior to publicly releasing the final 2025 SCS and continues to work with CARB staff until the TM is suitable for use in the SCS.

Please note that CARB staff has also provided comments related to the draft SCS on August 8, 2025, and the issues raised in that letter will also affect our assessment of GHG quantifications as noted there.

CARB staff are available to provide technical assistance and answer any questions that you may have about these comments. 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 of The California Air Resources Board

cc: without enclosures

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