

November 4, 2019

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

RE: CARB comments on SACOG's draft update to its 2020 MTP/SCS

Dear Mr. Corless:

California Air Resources Board (CARB) staff appreciate the opportunity to review and engage with Sacramento Area Council of Governments' (SACOG) staff on the draft update to its Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). This work is more important than ever, as you know Governor Newsom signed Executive Order N-19-19 this past September to redouble the State's efforts to reduce greenhouse gas (GHG) emissions, especially related to strategies for lowering vehicle miles traveled (VMT). The SCS plays a critical role in supporting the State's climate efforts, as well as local objectives of creating an economically vibrant region that responds to the needs of its diverse communities and provides better access to jobs and cleaner air for its residents. We appreciate the partnership that SACOG and CARB share as we endeavor to achieve these shared goals through coordinated land use and transportation planning.

In a meeting last month, our staffs discussed and came to agreement on additional information and clarifications that will be made by SACOG staff in the final 2020 MTP/SCS. CARB staff want to acknowledge and appreciate SACOG staff's cooperation and prompt responses on these items, which include:

- Adding reporting of observed data as it relates to achievement of its latest 2020 targets, and if needed, discussing what adjustments and changes SACOG has prioritized in the SCS to get the region on track to achieve its 2020 target as soon as is reasonably practicable.

- Adding reporting on implementation of strategies and actions that were included in its previous 2016 MTP/SCS such that CARB staff can discern progress the region has made towards meeting its GHG emissions reduction targets through its implementation efforts, as well as discussion of how this information has influenced change in the set of strategies and actions included in the 2020 MTP/SCS.
- Adding information on how MTP/SCS transportation investments support the plan's strategies, actions, and claimed GHG emissions reductions by identifying the coordinating transportation strategies being pursued in Developing Communities locations that will mitigate the risk of VMT growth that can result from stronger growth projections in these areas, as well as identifying how the plan's overall investments have changed to support mode shift.
- Clarifying and adding detail to some of the identified near-term actions to help better track these MTP/SCS commitments over time.

In addition, CARB and SACOG staff also discussed the mileage-based user fee (PayGo) program in the 2020 MTP/SCS. CARB staff acknowledge the importance of exploring user fee options for not only reducing per capita VMT and congestion, but also providing additional funding sources to support projects that provide better travel choices. CARB looks forward to partnering with SACOG on exploring policies that can facilitate implementation of a mileage-fee program. In addition, SACOG may be able to attribute emissions reductions from PayGo or other similar programs towards Senate Bill 375 targets, provided what the region implements is above and beyond State actions.¹ To do so, SACOG should provide further documentation of the assumptions being used to estimate and attribute GHG emissions reductions as a *result of the regional program* in its 2020 MTP/SCS submittal to CARB.

¹ See pages 28 – 29 of CARB's *Updated Final Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets* at https://ww3.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.pdf?_ga=2.25614781.1272438952.1572376271-1067821673.1540248233 and *Draft Sustainable Communities Strategy Program and Evaluation Guidelines* at <https://ww2.arb.ca.gov/resources/documents/scs-evaluation-resources>, for discussion of Local/Regional Pricing Policy .

Mr. James Corless
November 4, 2019
Page 3

We look forward to continuing our collaboration with SACOG as it finalizes and adopts the plan. If you have any questions, please contact me at Jennifer.Gress@arb.ca.gov, or my staff, Nicole Dolney at nicole.dolney@arb.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Gress". The signature is written in a cursive style with a large initial "J".

Jennifer Gress

Chief

Sustainable Transportation and Communities Division

cc: Nicole Dolney
Chief
Transportation Planning Branch