

November 15, 2019

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

RE: CARB Acceptance of SACOG's Senate Bill 375 Greenhouse Gas Emissions  
Technical Quantification Methodology

Dear Mr. Corless:

California Air Resources Board (CARB) staff appreciate Sacramento Area Council of Governments' (SACOG) Senate Bill 375 (SB 375) technical quantification methodology submittal, as well as subsequent addendums<sup>1</sup> addressing CARB staff questions and concerns. SACOG's submittals fulfill the requirement under California Government Code section 65080 (b) (2) (I) that each Metropolitan Planning Organization submit to CARB a description of the technical methodology it will use to estimate greenhouse gas emissions from its Sustainable Communities Strategy (SCS).

CARB staff have reviewed SACOG's summary of proposed technical methods and planning analysis tools for assessing SB 375 transportation-related greenhouse gas emissions from its 2020 SCS. Based on our review, staff believes there are no aspects of the submitted technical methodology that would yield inaccurate estimates of SB 375 greenhouse gas emissions. On the specific topic of version of EMFAC to be used, CARB staff confirm the need for SACOG to include calculations that use EMFAC2011 for the forecast years 2020 and 2035 in its submittal. CARB staff have no other suggested remedies to recommend at this stage.

CARB staff's final technical evaluation will take place once SACOG submits its final SCS to CARB. CARB will review and make a final determination using the

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<sup>1</sup> SACOG submitted two addendums regarding its technical methodology to CARB staff on August 12, 2019 and September 3, 2019. Two email supplements were provided on November 1, 2019 and November 8, 2019.

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methodology identified in its updated guidelines.<sup>2</sup> The guidelines are intended to clarify the scope of CARB's updated strategy-based evaluation process. CARB's evaluation of MPO SCSs will focus on changes to land use and transportation strategies and investments that MPOs are making from one SCS to the next. As part of the final review process, CARB staff may request additional information to conduct and support our final evaluation pursuant to SB 375.

We look forward to continuing our collaboration with SACOG as it finalizes and adopts its 2020 MTP/SCS. If you have any questions, please contact me at [nicole.dolney@arb.ca.gov](mailto:nicole.dolney@arb.ca.gov).

Sincerely,

/s/

Nicole Dolney  
Chief  
Transportation Planning Branch

cc: Bruce Griesenbeck  
[bgriesenbeck@sacog.org](mailto:bgriesenbeck@sacog.org)

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<sup>2</sup> CARB's *Final SCS Program and Evaluation Guidelines* and responses to comments documents are available at: <https://ww2.arb.ca.gov/resources/documents/scs-evaluation-resources>.