

September 20, 2024

Rosa De León Park
Executive Director
Stanislaus Council of Governments
1111 I Street, N. 308
Modesto, California 95354
Rpark@stancog.org

Dear Executive Director Park:

In accordance with the Sustainable Communities and Climate Protection Act of 2008, please find enclosed the California Air Resources Board's (CARB) Executive Order G-23-158 and CARB staff's evaluation of the Stanislaus Council of Governments (StanCOG) SB 375 Regional Transportation Plan/Sustainable Communities Strategy (2022 SCS). The Executive Order accepts StanCOG's determination that the region would, when fully implemented, achieve its target of a 16% per capita greenhouse gas (GHG) emissions reduction from automobiles and light trucks by 2035 relative to 2005 levels. CARB staff's evaluation report summarizes its assessment, findings, and recommendations relating to the determination on the 2035 target.

CARB staff would like to acknowledge some of the positive aspects of the plan. First, CARB staff appreciate that StanCOG included new strategies relative to the 2018 SCS. Second, StanCOG's commitment to expand and enhance its new StanisCruise transportation demand management program as the one-stop resource for commuting options in Stanislaus County will be important for increasing mode shifts in the region.

Though the Executive Order accepts the 2022 SCS 2035 target determination based on a sufficient presentation of information that would support achievement if every strategy and measure were in fact implemented, CARB staff is concerned that this plan will not be fully implemented as StanCOG envisions. CARB staff is concerned that key strategies necessary to achieve the GHG reduction target will not be implemented, as detailed in CARB's evaluation report. More support will be needed to realize the land use and housing strategy and mode shift to active transportation at the assumed levels. StanCOG's continued focus on enhancing the land use and housing strategy is very important for addressing the dual crises of housing and climate change. This ongoing focus, coupled with increasing transportation choices in the region, is necessary to reduce per capita GHG emissions in furtherance of implementing the SCS land use scenario. Further, additional partnership and funding commitments will be needed to meet the assumed GHG reductions from telecommuting, carpooling, as well as electric vehicle use.

Reducing VMT is more important than ever. As the 2022 Progress Report assessing progress toward the goals of Senate Bill 375 found, per capita VMT continues to increase statewide. The 2022 Scoping Plan Update, adopted by the CARB Board in December 2022, shows that new vehicle sales being 100% zero-emission by 2035 will not be enough to achieve carbon neutrality by 2045. In addition to technology-based solutions, California needs to reduce VMT per capita 25% by 2030 relative to 2019 levels, and 30% by 2045. Implementation of StanCOG's 2022 SCS is an important element of achieving these ambitious goals. To support successful implementation, and the GHG benefits claimed, CARB staff includes specific recommendations in the SCS evaluation report and requests StanCOG regularly monitor the implementation of the plan in consultation with CARB and other relevant agencies.

Looking to StanCOG's fourth cycle SCS, please work closely with CARB staff as you prepare for the submittal of your next technical methodology prior to the start of your public participation process, as SB 375 requires. Doing so will ensure that the plan the StanCOG Board adopts appropriately demonstrates it meets the target and minimizes the back-and-forth with staff following plan adoption. CARB staff also encourage StanCOG's participation in CARB's process to update the SCS evaluation guidelines as we discuss potential changes to CARB's evaluation of quantification methodologies for subsequent cycles.

CARB staff appreciates StanCOG's continued work to advance environmental sustainability in a way that increases transportation choice and housing opportunities and looks forward to an ongoing partnership to implement this plan and develop the fourth cycle plan. If you have any questions or need further information, please contact me, at Jennifer.Gress@arb.ca.gov.

Sincerely,



Jennifer Gress, Ph.D., Division Chief, Sustainable Transportation and Communities Division

Enclosures (2)

cc: Javier Lopez, Chair of the Policy Board, StanCOG & City of Ceres Mayor
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