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July 14, 2022

California Air Resources Board  
Sustainable Transportation and Communities Division  
Attn: Jennifer Gress, Division Chief  
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**RE: Draft 2022 Progress Report (SB 150 Report)**

Dear Division Chief Gress:

The Sacramento Area Council of Governments (SACOG), representing six counties and 22 cities in the Sacramento region, appreciates the opportunity to comment on the Draft 2022 Progress Report, required by Senate Bill (SB) 150. The Draft 2022 Progress Report represents significant outreach, analysis and dedication from the ARB staff, board, and partners. We appreciate the work of staff and the partnership demonstrated in the development of this report. SACOG looks forward to continued partnership with our transportation and air quality peers at the local, regional, and state levels to make progress toward our shared climate and equity goals.

SACOG has nearly two decades of experience analyzing the relationship between land use decisions and travel behavior. Our SACOG Regional Transportation Plan (RTP), regionally called our Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), outlines a path for improving our air quality, preserving open space and natural resources, and helping California achieve its goal to reduce greenhouse gas (GHG) emissions that contribute to climate change.

We appreciate that the Draft Progress Report identifies a number of local, regional, and state actions that could help implement regional Sustainable Communities Strategies (SCS) and that we all have a role to play. This demonstrates the partnership that will be necessary to successfully implement the regional strategies and achieve our SB 375 goals. Furthermore, the report includes many similar findings as the recent draft *California Transportation Assessment Report* released by the Strategic Growth Council pursuant to AB 285 (Friedman, 2019), further emphasizing the need for continued partnership at all levels of government.

**Focus on Implementation Tools and Funding**

We agree with the report's focus on the need for additional tools to meet the state's climate goals and we support the report's conclusion the priority should be

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Colfax  
Davis  
El Dorado County  
Elk Grove  
Folsom  
Galt  
Isleton  
Lincoln  
Live Oak  
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Marysville  
Placer County  
Placerville  
Rancho Cordova  
Rocklin  
Roseville  
Sacramento  
Sacramento County  
Sutter County  
West Sacramento  
Wheatland  
Winters  
Woodland  
Yolo County  
Yuba City  
Yuba County

identifying and supporting more tools for SCS implementation as MPOs do not have all the funding or tools needed to implement their regional plans. MPOs are well-suited to implement SCS strategies, though efficacy is limited by a lack of implementation tools and funding. MPO-controlled funding that is flexible enough to support transportation, land use, or housing investments is needed, as are additional financing options. Current available state and federal funding primarily focuses on transportation investments, yet housing and land use policies have proved to be among the most effective ways to reduce GHG emissions.

Beyond funding, MPOs need a more varied array of tools to move from MTP/SCS recommendation to implementation. This could include expanded ability and state funding to pilot innovative approaches within their boundaries and stronger partnerships with the state that allow the option for the MPO to spur state implementation action.

### **Fund Efforts to Accelerate Infill Development**

SACOG enthusiastically supports the report's suggested potential actions to accelerate infill development with action from State agencies and the Legislature to expand funding and financing options, including a focus on infill-supportive infrastructure (e.g., investing and upgrading infrastructure for sewers, water systems, transit, roads, or public facilities). A state funding program could be done through augmentation of existing funding programs such as the Regional Early Action Planning Grant funds, or through a program modeled off of the Infill Infrastructure Grant (IIG) program to provide focused funding for SCS implementation. For example, expanding the IIG program to help fund SCS implementation would provide upfront investments in critical infrastructure in broader low VMT infill corridors to make it economically viable for developers to build more housing in these climate friendly locations. Additionally, critical to accelerating infill development is ensuring access to patient money to fund necessary infrastructure to unlock the potential for development. These are areas where the infrastructure needs to be installed before the housing and the most transformational projects may not be the most shovel ready.

### **Support Equity and Community Involvement**

We appreciate the report's focus on the addressing existing inequities and changing how we build and connect communities be more equitable and accessible. Additionally, more flexible funding is needed to support local and regional efforts to create community-led planning and implement projects identified, developed, and prioritized by local communities.

## Need for Innovation and Pricing

We are pleased to see the report highlight the need for innovation and the importance of pricing in achieving our vehicle miles traveled (VMT) reduction goals. These are two priority areas that we think are ripe for partnership opportunities.

We have a few additional comments for consideration as the Draft Progress Report is finalized.

- **Accurately estimating VMT at a regional level is critical but very complex.** MPOs are skilled at this and have data and models for estimating and analyzing VMT that have been honed over time with great attention to detail. Using different data and/or methods to estimate VMT in the draft report could cause confusion. While we agree that the VMT/GHG estimations based on the methodologies used in the Draft Progress Report are good for tracking relative changes, we are concerned about the conclusion the report draws that “none of the regions were on track to meet the 2020 GHG targets” on page 18 of Appendix A. Because of all the caveats described at the end of Appendix A, we encourage staff to work closely with MPOs to correct, refine and/or contextualize the data, and statements like the one above, in the document.
- **Emphasize the importance of safety.** Although there is a section that discusses the importance of a safe transportation system for all travelers and all types of travel modes, there is a lack of recognition in some of the potential actions. Potential actions related to prioritizing goals such as VMT reduction in planning, projects, and funding should also acknowledge the need to continue prioritizing safety projects.
- **Acknowledge competing state objectives and goals.** The recent *California Transportation Assessment Report* notes that there are many state plans and programs, sometimes with competing goals. More work is needed to align all state goals, programs and projects and the state must better prioritize its investments while considering financial capacity, weighing tradeoffs across a broad range of policy objectives and goals.
- **Define the process for replacing the gas tax.** In addition to enabling equitable pricing strategies that will help reduce VMT, we need a clear solution, process, and timeline to replace the gas tax. We know the gas tax is steadily declining and we want a continued increase in electric vehicles, but without enough advanced planning we will not have the funds needed to operate and maintain the

transportation system for all users and modes. Developing a process for this should be a top priority.

- **Prioritize with regional partners.** The Draft Progress Report outlines a number of proposed actions to support SCS implementation and ultimately the achievement of state goals to reduce VMT and GHG. ARB's recent Draft 2022 Scoping Plan also includes a list of actions focused on this. The recent *California Transportation Assessment Report* also outlines potential actions focused here. We strongly recommend that the state work together to create a working group that is focused on prioritizing these actions and includes regional agencies as well as other key stakeholders.

Thank you again for your consideration of our comments. We are happy to provide more detail on any of this as needed. Our desire is to be good partners in the state's effort to combat climate change. Continued partnership will be needed to prioritize which tools and proposed actions from the report will be most effective for supporting regional implementation of the SCSs. We look forward to continued engagement with ARB and other state partners.

Sincerely,



James Corless  
Executive Director

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