

BUTTE COUNTY ASSOCIATION
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING
DECEMBER 12, 2024

Acronyms for Butte County Association of Governments

ACRONYM	MEANING
ACOE	Army Corps of Engineers
AFR	Accident Frequency Ratio
APS	Alternative Planning Strategy
AQMD	Air Quality Management District
ARB	Air Resource Board
AVL	Automatic Vehicle Location
BCAG	Butte County Association of Governments
BRT	Butte Regional Transit/B-Line
Cal+A3:B51	Assembly Bill
CALCOG	California Association Council of Governments
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation
CAPTI	Climate Action Plan for Transportation Infrastructure
CARB	California Air Resource Board
CEQA	California Environmental Quality Act
CMAQ	Congestion Mitigation & Air Quality
CON	Construction
CTC	California Transportation Commission
CTIPS	California Transportation Improvement Program System
DFG	California Department of Fish and Game
DOT	Department of Transportation
EIR	Environmental Impact Report
EMFAC	Emissions Factors
EPA	Environmental Protection Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
FTIP	Federal Transportation Improvement Program
FY	Fiscal Year
GARVEE	Grant Anticipation Revenue Vehicle Program
GhG	Greenhouse Gas Emissions
GIC	Geographical Information Center
GIS	Geographic Information Systems
GPS	Global Positional Satellite
HCP	Habitat Conservation Plan
IIP	Interregional Improvement Program
IPG	Intermodal Planning Group
ITIP	Interregional Transportation Improvement Program
ITS	Intelligent Transportation Systems
JPA	Joint Powers Agreement
LAFCO	Local Agency Formation Commission
LCTOP	Low Carbon Transit Operations Program
LTF	Local Transportation Fund
MPO	Metropolitan Planning Organization
NAAQS	National Air Quality Standards
NCCP	Natural Community Conservation Plan
NEPA	National Environmental Policy Act
NMFS	National Marine Fisheries Service (Also NOAA Fisheries)
NOAA	National Oceanic and Atmospheric Administration Fisheries (Also NMFS)

ACRONYM	MEANING
OWP	Overall Work Program
PA&ED	Project Approval & Environmental Document
PDT	Project Development Team
PEER	Permit Engineering Evaluation Report
PL	Federal Planning Funds
PLH	Public Lands Highway
PPH	Passengers Per Revenue Hour
PPM	Planning Programming & Monitoring
PPNO	Project Programming Number
PS&E	Plans, Specifications & Estimates
PSR	Project Study Report
PTMISEA	Public Transportation Modernization Improvement and Service Enhancement Account
PUC	Public Utilities Code
R/W	Right of Way
REAP	Regional early Action Planning
RFP	Request for Proposals
RHNA	Regional Housing Needs Allocation
RHNP	Regional Housing Needs Plan
RIP	Regional Improvement Program
RTAC	Regional Target Advisory Committee
RTIP	Regional Transportation Improvement Program
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
SACOG	Sacramento Area Council of Governments
SAFETEA-LU	Safe Accountable Flexible Efficient Transportation Equity Act: A Legacy for Users
SCEA	Sustainable Community Environmental Assessment
SCS	Sustainable Community Strategy
SDP	Strategic Deployment Plan
SGR	State of Good Repair
SHOPP	State Highway Operation Protection Program
SSTAC	Social Services Transportation Advisory Council
STA	State Transit Assistance
STIP	State Transportation Improvement Program
TAC	Transportation Advisory Committee
TAOC	Transit Administrative Oversight Committee
TCRP	Transportation Congestion Relief Program
TDA	Transportation Development Act
TE	Transportation Enhancements
TIP	Transportation Improvement Program
TIRCP	Transit and Intercity Rail Capital Program
TPP	Transit Priority Project
TSGP	Transit Security Grant Program
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UTN	Unmet Transit Needs
WE	Work Element
ZETCP	Zero Emission Transit Capital Program



Bill Connelly, Chair
Supervisor, District 1

Andy Newsum
Executive Director

Kasey Reynolds, Vice Chair
Councilmember, Chico

BUTTE COUNTY ASSOCIATION OF GOVERNMENTS - BOARD OF DIRECTORS

Peter Durfee
Supervisor, District 2

Regular Meeting Agenda
December 12, 2024 - 9:00 a.m.

Tami Ritter
Supervisor, District 3

Tod Kimmelshue
Supervisor, District 4

Meeting Location:
Butte County Association of Governments Board Room
326 Huss Drive, Suite 100, Chico, CA 95928

Doug Teeter
Supervisor, District 5

Members of the public may attend the meeting in person or via Zoom through the following link:

Chuck Nuchols
Councilmember, Biggs

[BCAG Board Meeting Live](#)

J Angel Calderon
Councilmember, Gridley

Zoom Meeting ID: 849 6500 5064 Password: 779428

David Pittman
Mayor, Oroville

Public comments may also be sent to: board@bcag.org

To join the meeting by phone: +1 669 900 6833

Rose Tryon
Councilmember, Paradise

*****Board Meeting transit service is available on meeting days only*****
To/from the Chico Transit Center
Depart - 8:35 AM & Return - 10:50 AM

Copies of staff reports and other written documentation relating to agenda items can be made available at the office of the Butte County Association of Governments (BCAG). Persons with questions concerning agenda items and/or who may have special needs can contact BCAG at (530) 809-4616 48 hours in advance of the meeting. Every reasonable effort will be made to provide identified and required accommodation.

1. Pledge of Allegiance
2. Roll Call

CONSENT AGENDA

3. Minutes from October 24, 2024, BCAG Board of Directors Meeting – Ashley

ITEMS REMOVED FROM CONSENT AGENDA

REGULAR AGENDA

ITEMS FOR ACTION

4. Approval of **Resolution 2024/2025-06** - Amendment #1 to the 2025 Federal Transportation Improvement Program (FTIP) and Air Quality Conformity Determination - **Ivan**
5. Public Hearing and Approval of Butte Regional Transit Fare Increase – **Sara**
6. Public Hearing and Adoption of Final 2024 Regional Transportation Plan/Sustainable Communities Strategy & Certification of Supplemental Environmental Impact Report – **Chris**
7. 2025 Unmet Transit Needs Process Butte Regional Transit Public Hearing - **Victoria**

ITEMS FOR INFORMATION

8. Sustainable Communities Strategy Statewide Coordination Request - **Andy**
9. FY 2023 Triennial Review of the Butte County Association of Governments as Prepared by the Federal Transit Administration – **Andy**
10. Transit and Intercity Rail Capital Program (TIRCP) Project Update/Revision – **Andy**
11. Butte Regional Transit Marketing Plan – **Sara**
12. Butte Regional Transit 1st Quarter 2024/25 Report - **Victoria**

ITEMS FROM THE FLOOR

13. Members of the public may present items to the BCAG Board of Directors, but no action will be taken other than placement on a future agenda. Handouts presented by speakers are to be distributed to the Board by the Clerk of the Board.

ADJOURNMENT

14. The next meeting of the BCAG Board of Directors has been scheduled for Thursday January 23rd, 2025, at the BCAG Board Room & via Zoom.

Meetings held the 4th Thursday of every month at 9 a.m. unless otherwise noticed

BUTTE COUNTY ASSOCIATION
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING
ITEM #3



BCAG Board of Directors

Agenda Item #3 – Consent

Date: December 12,2024

Subject: DRAFT Meeting Minutes of the Butte County Association of Governments Board of Directors October 24, 2024

Contact: Ashley Carriere, Administrative Assistant

The following minutes are a summary of actions taken by the Board of Directors. A digital recording of the actual meeting is available at BCAG’s office located at 326 Huss Drive, Suite 150, Chico, CA.

Board Member Reynolds called the meeting to order at 9:02 a.m. at the BCAG Board Room, 326 Huss Drive, Suite 100, Chico, CA.

MEMBERS PRESENT IN PERSON

Tami Ritter	Supervisor	District 3
Doug Teeter	Supervisor	District 5
David Pittman	Mayor	City of Oroville
Bill Connelly	Supervisor	District 1
Rose Tryon (9:03 am)	Vice Mayor	Town of Paradise
Tod Kimmelshue	Supervisor	District 4
Kasey Reynolds	Vice Mayor	City of Chico

MEMBERS ABSENT

Chuck Nuchols	Councilmember	City of Biggs
J Angel Calderon	Councilmember	City of Gridley
Peter Durfee	Supervisor	District 2

STAFF PRESENT

Andy Newsum	Executive Director
Cheryl Massae	Human Resources Director
Amy White	Transportation Analyst
Ashley Carriere	Administrative Assistant
Sara Cain	Transit Manager
Ivan Garcia (Zoom)	Programming Director
Chris Devine	Planning Director
Victoria Proctor	Transportation Analyst
Julie Quinn	Chief Fiscal Officer

Agenda Item #3 – Consent

OTHERS PRESENT

Lance Atencio

Transdev

1. **Pledge of Allegiance**
2. **Roll Call**

CONSENT AGENDA

3. Approval of Minutes from the September 26, 2024, BCAG Board of Directors Meeting
4. Approval of Resolution No. 04-2024/25 Master Fund Transfer Agreement with California Department of Transportation (Caltrans) 2025-2034
5. Approval of Amendment #1 (A1) to the 2024/25 Overall Work Program (OWP) and Budget and Overall Work Program Agreement

On motion by Board Member Durfee and seconded by Board Member Tryon, the Consent Agenda was unanimously approved.

ITEMS FOR ACTION- *None*

ITEMS FOR INFORMATION

6: Butte Regional Transit Fare Increase

BCAG Transit Manager further discussed the B-Line Fare Structure and Increase that is underway.

Staff recommended a fare increase of 15% for both Fixed Route and Paratransit, effective January 1, 2025.

The Social Services Transportation Advisory Council (SSTAC), Transportation Advisory Committee (TAC), and the Transit Administrative Oversight Committee (TAOC) will all be notified of the fare increase.

Staff will bring this item back to the Board for approval at the December 2024 meeting.

This item was presented for informational purposes.

7: Coordinated Public Transit-Human Services Transportation Plan Update

BCAG Transportation Analyst talked about the Coordinated Public Transit-Human Services Transportation plan that was developed in 2008, in response to federal guidelines.

Staff discussed the purpose of the Coordinated Transportation Plan is to identify human services organizations in Butte County that are helping fill gaps in transportation.

Outreach will include a targeted survey to human services organizations supporting the elderly and/or disabled.

This item was presented for information only.

8: 2025 Unmet Transit Needs Process

Staff presented the required Unmet Transit needs Assessment mandated by the Transportation Development Act (TDA). This assessment is required to be completed before TDA funds can be expended on streets and roads.

BCAG receives and reviews comments year-round, however the Unmet Transit Needs process provides a formalized method of tracking those comments and entering them into the public record and compiled into a document that is reviewed by Social Services Transportation Advisory Council and the BCAG Board before being adopted and sent to Caltrans for final approval.

This Item is presented for Information purposes only.

ITEMS FROM THE FLOOR

15: Members of the public may present items to the BCAG Board of Directors, but no action will be taken other than placement on a future agenda.

Public comment was received, via BCAG Board e-mail, at 9:30am on October 24, 2024. A member of the public commented regarding the ongoing construction on the Esplanade and its impact on B-Line routes.

ADJOURNMENT

With no further items to discuss, the BCAG Board meeting adjourned at 9:16 AM.

Attest:

Andy Newsum, Executive Director

Ashley Carriere, Board Clerk

Butte County Association of Governments

BUTTE COUNTY ASSOCIATION
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING
ITEM #4

BCAG Board of Directors

Agenda Item #4 - Action

Date: December 12, 2024

Subject: Approval of Resolution 2024/2025-06 Amendment #1 to the 2025 Federal Transportation Improvement Program (FTIP) and Air Quality Conformity Determination

Contact: Ivan Garcia, Programming Director

Summary: The BCAG Board of Directors adopted the 2025 Federal Transportation Improvement Program (FTIP) on September 26, 2024. The FTIP included an Air Quality Conformity Determination consistent with the 2020 Regional Transportation Plan/ Sustainable Communities Strategy. Amendment to the 2025 FTIP is required to ensure consistency with the new 2024 RTP/SCS scheduled for adoption on December 12, 2024. This amendment supplants the Air Quality Conformity Determination. No other changes have been made.

The Air Quality Emissions Analysis and Conformity Determination for the 2025 FTIP and 2024 RTP/SCS is posted at BCAG's webpage at:

<https://www.bcag.org/PlansProgramsModel/Regional-Transportation-Air-Quality-Planning/index.html>.

Staff held an Interagency Consultation Review meeting to inform the required federal and state agencies of this amendment. This amendment has been prepared in accordance with BCAG's adopted Public Participation Plan.

Action(s) requested:

- Hold public hearing for comment.

If no significant comments are received during the public hearing:

- Approve Amendment #1 to the 2025 FTIP and Air Quality Conformity Determination and Authorize the Chair to sign Resolution # 2024/25-06.

Note: If significant comments are received, staff will address and bring the revised document before the Board for approval at the next regularly scheduled meeting.

Attachments:

- Resolution No. 2024/2025-06



AMENDMENT #1 TO THE 2025 FEDERAL TRANSPORTATION IMPROVEMENT PROGRAM (FTIP) AND AIR QUALITY CONFORMITY DETERMINATION FOR BUTTE COUNTY

WHEREAS, the Butte County Association of Governments is the designated Metropolitan Planning Organization for Butte County in accordance with 23 USC 134(b)(6); and Section 450.306 of the Metropolitan and Statewide Planning Rule;

WHEREAS, the Infrastructure Investment and Jobs Act (IIJA) (Public Law 117-58, also known as the “Bipartisan Infrastructure Law”) into law on November 15, 2021 requires the Butte County Association of Governments, as the Metropolitan Planning Organization, to prepare a Transportation Improvement Program in cooperation with the State and transit operators, to include all projects to be funded under Title 23 and the Federal Transit Administration grants; and requires BCAG to prepare a long-range Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) and short-range Federal Transportation Improvement Program (FTIP);

WHEREAS, the Butte County Association of Governments has prepared Amendment #01 to the 2025 FTIP as attached to this resolution for the purpose of updating the Air Quality Conformity Determination to ensure consistency with the 2024 RTP/SCS;

WHEREAS, the 2025 FTIP is consistent with the metropolitan transportation planning regulations pursuant to Title 23 Code of Federal Regulations Section 450, Title 23, United States Code Section 134, and Title 49 United States Code Section 5303;

WHEREAS, the 2025 FTIP is consistent with the transportation system described in the current 2024 RTP/SCS;

WHEREAS, the 2025 FTIP is financially constrained by year and includes a financial plan that demonstrates which projects can be implemented using committed funds and affirms the availability of funding;

WHEREAS, the 2025 FTIP includes all regionally significant projects to be funded from local, state, or federal resources;

WHEREAS, projects in the 2025 FTIP satisfy the transportation conformity provisions of 40 CFR 93.122(g) and all applicable transportation planning requirements per 23 CFR Part 450 including the establishment of federal performance management targets for safety, pavement and bridge conditions, reliability and congestion, and transit assets and safety in the planning region;

WHEREAS, The results from the 2025 FTIP and 2024 RTP emissions analysis show that current and future emissions of the ozone precursors ROG and NOx will be no greater than the 2011 and 2017 base year emissions levels. Thus, Butte County, in accordance with the Transportation Conformity Rule requirements applicable to Butte County (§51.464 and §51.436 – 51.440), has satisfied the “no-greater-than-2011” test for the 2008 8-hour federal ozone NAAQS and the “no-greater-than-2017” test for the 2015 8-hour federal ozone NAAQS. Based on this analysis, the 2024 Regional Transportation Plan (RTP) and 2025 Federal Transportation Improvement Program (FTIP) conforms to the applicable State Implementation Plan (SIP) and all applicable sections of the EPA’s Transportation Conformity Rule.

WHEREAS, Butte County does not have any required Transportation Control Measures in the State Implementation Plan;

WHEREAS, the 2025 FTIP satisfies the requirements by the Federal Transit Administration for the “Programming of Projects” (POP);

WHEREAS, BCAG developed the 2025 FTIP and Air Quality Conformity Determination in accordance with the adopted Public Participation Plan;

NOW THEREFORE BE IT RESOLVED that the Butte County Association of Governments hereby approves Amendment #1 for the 2025 Federal Transportation Improvement Program and Air Quality Conformity Determination;

BE IT FURTHER RESOLVED that BCAG staff is hereby directed and authorized to work with the California Department of Transportation, the Federal Highway Administration, the Federal Transit Administration, and the Environmental Protection Agency to make any necessary changes or corrections that may be needed to ensure the timely delivery of the FTIP to obtain its approval;

BE IT FURTHER RESOLVED that the BCAG Board authorizes its staff to administratively modify/amend the 2025 FTIP as outlined in the procedures defined in the FTIP in accordance with BCAG’s Public Participation Process (PPP).

PASSED AND ADOPTED by the Butte County Association of Governments on the 12th day of December 2024 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

APPROVED:

BILL CONNELLY, CHAIR
BUTTE COUNTY ASSOCIATION OF GOVERNMENTS

ATTEST:

ANDY NEWSUM, EXECUTIVE DIRECTOR
BUTTE COUNTY ASSOCIATION OF GOVERNMENTS

BUTTE COUNTY ASSOCIATION
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING
ITEM #5



BCAG Board of Directors

Agenda Item #5 – Action

Date: December 12, 2024

Subject: Public Hearing and Approval of Butte Regional Transit Fare Increase

Contact: Sara Cain, Transit Manager

Summary: At the October BCAG Board of Directors meeting, staff presented a recommended fare increase for B-Line fixed route and paratransit systems. Staff has completed a 30-day public comment period and notified the Social Services Transportation Advisory Council (SSTAC) and Transit Administrative Oversight Committee (TAOC) of the proposed fare increase. If approved by the Board of Directors, the fare increase would be effective January 1, 2025.

Action(s) requested:

- Board Chair to hold a public hearing for comments; and
- Approve the Butte Regional Transit fare increase.

Attachment: Staff Report

Agenda Item #5 - Action

Staff Report

The farebox ratio is the percentage of the transit operations cost that is covered by the public, the remainder being subsidized with federal grants and state Transportation Development Act (TDA) funds. Since 1971, the TDA mandated that passenger fares make up a certain percentage of operating costs. Fare increases are considered every three (3) years to determine if farebox recovery ratios are being maintained. Due to decreasing farebox recovery for fixed route services, B-Line introduced the blended ratio of 15.6% for fixed route with an approval from Caltrans in FY 2022/23. The 10% ratio for paratransit remains.

Collected fares are monitored on an ongoing basis and reviewed each budgetary cycle to ensure farebox ratios are being met. The last in-depth analysis of a fare increase was conducted in 2019, which was shortly followed by the COVID-19 pandemic and an unprecedented decrease in ridership systemwide. The decrease in ridership combined with increasing costs for operations, primarily for fuel, labor, and maintenance, has led to a shortfall that is currently being covered by federal and state funds and represents a five (5) year period in which fare changes have not been assessed.

Increasing fares is necessary to improve fare coverage and to help fund increasing costs of the system. Due to COVID, B-Line has not increased fares in over five (5) years. In considering fare increase there are two main factors to be understood:

- 1) How much have service costs increased and how much can fares be increased so as not to disenfranchise those using the system?
- 2) What fares are similar and adjacent agencies/municipalities systems, respecting size and service, supporting their systems with?

Service Costs:

With the two-year contract extension beginning on July 1, 2024, the contract cost for the services delivered by Transdev increased close to 8% from the prior year. Much of this cost is represented by significant labor, maintenance, and insurance increases.

Adjacent/Similar Systems:

- The Redding Area Bus Authority (RABA) charges \$2.00 for a two-hour pass; \$50.00 for a 30-day pass; and \$4.00 for a one ride paratransit trip.
- Sacramento Regional Transit (SacRT) fares are \$2.50 for a one ride pass; \$100.00 for a 30-day pass; and \$5.00 for a one ride paratransit trip.
- Yolo Transit District (Yolobus) fares are \$2.00 for a one ride pass; \$84.00 for a 30-day pass; and \$4.00 for a one ride paratransit trip.

The proposed fare increase is also consistent with the previous 2019 fare increase of 18%, on average.

Based on the above considerations, a 16% average fare increase is proposed, and more specifically defined as followed below. This information has been slightly adjusted since the October Board of Directors meeting.

- Local Regular fare would be increased from \$1.75 to \$2.00.
- Regional Regular fare would increase from \$2.40 to \$3.00.
- Paratransit would increase from \$3.50 to \$4.00 for the ADA core zone.

B-Line Current and Proposed Fares/Passes				
Fixed Route				
		2019 Current	2025 Proposed	% Increase
One Ride Fare				
Local	Regular	\$1.75	\$2.00	14%
Local	Discount	\$0.85	\$1.00	18%
Regional	Regular	\$2.40	\$3.00	25%
Regional	Discount	\$1.20	\$1.50	25%
30 Day Pass				
Local	Regular	\$43.50	\$50.00	15%
Local	Discount	\$21.50	\$25.00	16%
Regional	Regular	\$57.50	\$66.50	16%
Regional	Discount	\$30.00	\$33.25	11%
All Day Pass		\$5.00	\$6.00	20%
10 Ride Pass				
Local	Regular	\$15.75	\$18.00	14%
Local	Discount	\$7.65	\$9.00	18%
Regional	Regular	\$21.60	\$25.25	17%
Regional	Discount	\$10.80	\$12.50	16%

Paratransit				
		2019 Current	2025 Proposed	% Increase
Core Zone		\$3.50	\$4.00	14%
Same Day Request		\$5.25	\$6.00	14%
Zone 1		\$8.75	\$10.00	14%
Zone 2		\$10.75	\$12.00	12%
Zone 3		\$12.75	\$14.00	10%

Note: Paratransit fares are required to be tied to fixed route fares and must also increase accordingly as standard ratios from base fares.

Staff received two public comments on the fare increase. Both comments addressed the complexities to delivering public transit and expressed concern for individuals that rely on public transit.

BUTTE COUNTY ASSOCIATION
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING
ITEM #6



BCAG Board of Directors

Agenda Item #6 - Action

Date: December 12, 2024

Subject: Public Hearing and Adoption of Final 2024 Regional Transportation Plan/Sustainable Communities Strategy & Certification of Final Supplemental Environmental Impact Report

Contact: Chris Devine, Planning Director

Summary: The Final 2024 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Supplemental Environmental Impact Report (SEIR) are complete and available on the BCAG website. A public hearing to receive public comment is required prior to adoption of the Final 2024 RTP/SCS and certification of accompanying Final SEIR via resolution #2024/2025-05.

Action(s) requested:

- Board Chair to hold a public hearing for comments
- Approve Final 2024 RTP/SCS and certify Final SEIR.

Attachments:

- Staff Report
- Summary of CEQA Findings
- Resolution #2024/2025-05

Agenda Item #6 - Action Attachment

Staff Report

The Final 2024 RTP/SCS and required environmental document (SEIR) have been completed and are available on the BCAG website. BCAG is required to prepare and update these documents every four years, and the 2024 documents are required to be adopted by December 2024. The documents can be accessed online at:

<https://www.bcag.org/PlansProgramsModel/RTP--SCS/2024-RTPSCS-Update/index.html>.

The Draft 2024 RTP/SCS and SEIR were reviewed with the BCAG Board at the September 2024 BCAG Board meeting. The documents were developed in accordance with BCAG's Public Participation Plan and included a 55-day public review period for the RTP/SCS document, and a 45-day review period for the SEIR during portions of September, October and November 2024. A virtual community workshop was held on October 15th during the public review period to solicit additional input on the draft documents. BCAG provided notices regarding the draft documents and workshop through a variety of channels including posters on the B-Line bus fleet in multiple languages. Additionally, staff attended various community events during the review period to distribute information on the draft documents and seek further input.

The 2024 RTP/SCS is BCAG's long-range transportation plan that covers the years 2024 to 2045 and serves as a foundation for the development of the short-range Regional Transportation Improvement Program (RTIP) and the Federal Transportation Improvement Program (FTIP). The plan was developed in consultation with the BCAG Transportation Advisory Committee, which includes staff from BCAG's member jurisdictions, Butte County Rancherias, citizen representatives, Butte County Air Quality Management District (BCAQMD), and Caltrans. In addition, staff held Interagency Consultation Review meetings with BCAQMD, Caltrans, Federal Highway Administration, and the Environmental Protection Agency. The plan was also developed in consultation with the Planning Directors Group which includes planning staff from all BCAG member jurisdictions and the Local Agency Formation Commission (LAFCO).

The Final 2024 RTP/SCS contains the following:

1. RTP/SCS Document – including all required elements (Policy, Action, Financial Elements and the SCS).
2. Air Quality Conformity Analysis and Determination – demonstrating that the projects in the RTP/SCS conform to the applicable federal air quality requirements.
3. SEIR – complying with the California Environmental Quality Act (CEQA) requirements.

The Final 2024 RTP/SCS reflects extensive community input received during the development of the draft plan over the past 2.5 years. This included a virtual community workshop in late 2023, participation at various community events, and completion of community surveys identifying community preferences for transportation and land use options in the region.

BCAG staff worked with Rincon Consultants, Inc. to develop the program-level SEIR. Pursuant to CEQA Guidelines Section 15086, BCAG consulted with and requested comments on the Draft SEIR from responsible agencies, trustee agencies with resources affected by the project, and other state, federal, and local agencies which exercise authority over resources which may be affected by the RTP/SCS.

The BCAG Board is required to certify the Final SEIR and find that it complies with the requirements of the California Environmental Quality Act (CEQA). In addition, the BCAG Board

must adopt a Summary of CEQA Findings of Fact, Statement of Overriding Considerations, and Mitigation and Monitoring and Reporting Program. Separate attachments are included identifying the Summary of CEQA Findings of Fact and Resolution #2024/225-05.

A public hearing is required prior to adoption of the documents to solicit final public input. Following approval of the Final 2024 RTP/SCS and certification of the Final SEIR, BCAG staff will submit the Final RTP/SCS to Caltrans and California Air Resources Board, and the Final SEIR to the State Clearinghouse. The next RTP/SCS update is due to be adopted by the BCAG Board in December 2028.

**Summary of
CEQA Findings of Fact, Statement of Overriding Considerations,
and Mitigation Monitoring and Reporting Program**

**Findings for Significant PROJECT and Cumulative Impacts for Which Project's
Incremental Contribution has Been Mitigated to Less than Significant Levels**

For the following impacts, BCAG hereby finds mitigation measures have been identified in the Final Supplemental EIR that will avoid or substantially lessen the Project's incremental contribution to the following significant project and cumulative impacts to a less than significant (i.e., less than cumulatively considerable) level. The significant impacts and the mitigation measures that will reduce them to a less than significant level are as follows:

- Impact AQ-3; Mitigation Measure AQ-3
- Impact AQ-1; Mitigation Measure AQ-1
- Impact BIO-1; Mitigation Measure BIO-1
- Impact BIO-2; Mitigation Measures BIO-2(a)-(c)
- Impact BIO-3; Mitigation Measure BIO-3
- Impact BIO-4; Mitigation Measure BIO-4
- Impact BIO-5; Mitigation Measure BIO-5
- Impact CUL-2; Mitigation Measure CUL-2(a), CUL-2(b)
- Impact CUL-4; Mitigation Measure CUL-3(a), CUL-3(b), CUL-3(c)
- Impact CUL-5; Mitigation Measure TCR-1(a), TCR-1(b)
- Impact GHG-1; Mitigation Measure GHG-1
- Impact NOI-1; Mitigation Measure N-1
- Impact NOI-2; Mitigation Measure N-2
- Impact NOI-3; Mitigation Measure N-1
- Aesthetics; Mitigation Measures AES 1(a), 1(b), 2(a), 2(b)
- Geology and Soils; Mitigation Measures GEO-1(a), GEO-1(b)
- Hydrology and Water Quality; Mitigation Measures W-1(a), W-1(b), W-1(c), W-2(a), W-2(b)
- Land Use and Planning; Mitigation Measures LU-1(a), LU-1(b), LU-1(c)
- Utilities and Service Systems; Mitigation Measures UTI-1(a), UTI-1(b), UTI-1(c), UTI-1(d), UTI-1(e)

**Findings for Significant PROJECT AND Cumulative Impacts for Which Project's
Incremental Contribution has Not Been Mitigated to Less than Significant
Levels**

For the following impacts, BCAG hereby finds that mitigation measures have been identified in the Final Supplemental EIR that will reduce the Project's incremental contribution to the following significant cumulative impacts, but not to a less than significant (i.e., less than cumulatively considerable) level. The significant impacts and the mitigation are as follows:

- Impact AG-1; Mitigation Measures AG-1(a)-(d)
- Impact CUL-1 Mitigation Measures CUL-1(a)
- Impact T-2; Mitigation Measure T-1
- Impact W-1; Mitigation Measure W-1

STATEMENT OF OVERRIDING CONSIDERATIONS

BCAG adopts and makes this statement of overriding considerations concerning the Project's unavoidable significant impacts to explain why the project's benefits override and outweigh its unavoidable impacts.

Even with implementation of all feasible mitigation, the project will result in significant and unavoidable impacts as follows:

1. Implementation of the 2024 RTP/SCS would convert agricultural lands including Prime Farmland and lands under Williamson Act contract to non-agricultural uses. (Impact AG-1)
2. Implementation of the 2024 RTP/SCS would disturb known and unknown cultural resources such as historic structures. (Impact CUL-1)
3. Implementation of the 2024 RTP/SCS would interfere with achievement of the vehicle miles traveled reductions set forth by the state. (Impact T-2)
4. Implementation of the 2024 RTP/SCS would increase wildfire risks. (Impact W-1)

Each benefit set forth below constitutes an overriding consideration warranting approval of the Project, independent of the other benefits, despite each and every unavoidable impact.

- a. The implementation of 2024 RTP/SCS transportation projects will provide for a comprehensive transportation system of facilities and services that meets the public's need for the movement of people and goods, and that is consistent with the social, economic, and environmental goals and policies of the region.
- b. The Project will improve transportation mobility and accessibility in the county.
- c. The Project will improve air quality by reducing emissions of ozone precursors compared to future No Project conditions.
- d. The 2024 RTP/SCS will contribute to a reduction in greenhouse gas (GHG) emissions from passenger vehicles and light trucks, helping the Butte County area to achieve the regional GHG reduction targets set by the California Air Resources Board.
- e. The Project will promote consistency between the California Transportation Plan 2025, the regional transportation plan and other plans developed by cities,

counties, districts, Native American Tribal Governments, and State and Federal agencies in responding to Statewide and interregional transportation issues and needs.

- f. The construction of transportation projects will result in both short-term and long-term economic benefits to the Butte County area and its residents. Transportation projects will indirectly provide for a number of jobs relating to construction and maintenance. The RTP program includes transportation investments in the BCAG region.

MITIGATION MONITORING AND REPORTING PROGRAM

BCAG finds that a Mitigation Monitoring and Reporting Program (MMRP) for the 2024 RTP/SCS has been prepared for the project and has been adopted concurrently with these Findings (Public Resources Code, § 21081.6(a)(1)).



BUTTE COUNTY ASSOCIATION OF GOVERNMENTS RESOLUTION NO 2024/2025 #05

A RESOLUTION OF THE BUTTE COUNTY ASSOCIATION OF GOVERNMENTS APPROVING THE 2024 REGIONAL TRANSPORTATION PLAN AND SUSTAINABLE COMMUNITIES STRATEGY AND CERTIFYING THE FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR THE 2024 REGIONAL TRANSPORTATION PLAN AND SUSTAINABLE COMMUNITIES STRATEGY, AND ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM

WHEREAS, the Butte County Association of Governments (BCAG) is the designated Metropolitan Planning Organization (MPO) comprised of five member agencies: Butte County, the cities of Biggs, Chico, Gridley, Oroville or Paradise; and

WHEREAS, BCAG is the agency responsible for maintaining a continuing, cooperative, and comprehensive transportation planning process which will result in a Regional Transportation Plan and Sustainable Communities Strategy pursuant to 23 U.S.C. 134(a) and (g), 49 U.S.C. §5303(f); 23 C.F.R. §450, and 49 C.F.R. §613; and

WHEREAS, BCAG is the Lead Agency in preparing the Regional Transportation Plan and Sustainable Communities Strategy and is required to comply with the California Environmental Quality Act (CEQA) [Cal. Pub. Res. Code § 21000 et seq.]; and

WHEREAS, pursuant to CEQA Guidelines Section 15002(f), an Environmental Impact Report (EIR) is the public document used by a governmental agency to analyze the significant environmental effects of a proposed project, to identify alternatives, and to disclose possible ways to reduce or avoid the potential environmental damage; and

WHEREAS, CEQA Guidelines Section 15168(a) specifies that a Program EIR (PEIR) be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) as logical parts in a chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria, to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways; and

WHEREAS, BCAG has determined that a Supplemental EIR (SEIR) is appropriate to assess the environmental impact of the 2024 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) for the Butte County regional given no major new projects and policies since the 2016 and 2020 RTP/SCS; and

WHEREAS, the 2024 RTP/SCS is consistent with Section 15163 of the CEQA Guidelines for supplemental EIRs as only minor additions and changes are necessary to make the 2016 RTP/SCS EIR and 2020 RTP/SCS SEIR adequate for the project as revised and conditions described in Section 15162 of the CEQA Guidelines do not apply to the 2024 RTP/SCS; and

WHEREAS, the SEIR is a regional planning level analysis which analyzes environmental impacts of the 2024 RTP/SCS on a broad planning level, while presenting as much detailed information about the individual RTP projects that is available at this time; and

WHEREAS, project-specific impacts of the individual RTP project should be analyzed in detail by the implementing agencies as the individual projects are designed, engineered, and considered for approval at a later date; and

WHEREAS, pursuant to CEQA Guidelines Section 15086, BCAG consulted with and requested comments on the Draft SEIR from responsible agencies, trustee agencies with resources affected by the project; and other state, federal, and local agencies which exercise authority over resources which may be affected by the RTP/SCS; and

WHEREAS, BCAG circulated a Notice of Preparation (NOP) of an EIR for the proposed project on November 9, 2023, to trustee and responsible agencies, the State Clearinghouse, and the public; and

WHEREAS, a scoping meeting was held on November 16, 2023, at 5:00pm in the BCAG Conference Room in the City of Chico to solicit concerns and issues relative to the RTP; and

WHEREAS, concerns raised in response to the NOP were considered during preparation of the Draft SEIR; and

WHEREAS, BCAG published a public notice of availability (NOA) for the Draft SEIR on September 18, 2024, inviting comments from the general public, agencies, organizations, and other interested parties; and

WHEREAS, the Draft SEIR was available for public review from September 18 through November 4, 2024; and

WHEREAS, pursuant to CEQA Guidelines Section 15088(a), BCAG, as the Lead Agency, must evaluate comments on significant environmental issues received from persons who review the Draft SEIR and must prepare a written response thereto; and

WHEREAS, BCAG received no comment letters, regarding the Draft Program EIR; and

WHEREAS, the Final SEIR document and the Draft SEIR, as amended by the Final SEIR, constitute the Final SEIR; and

WHEREAS, when making the findings pursuant to CEQA Guidelines Section 15091(a)(1), the agency must also adopt a program for reporting on or monitoring the changes which have been either required in the project or made a condition of approval to avoid or substantially lessen significant effects, and which are fully enforceable through permit conditions, agreements, or other measures, as required by CEQA Guidelines Section 15091(d); and

WHEREAS, consistent with the requirements of the CEQA Guidelines, a Mitigation Monitoring and Reporting Program (MMRP) has been prepared to outline the procedures for implementing all mitigation measures identified in the SEIR; and

WHEREAS, according to CEQA Guidelines Section 15093(b), where the decision of the public agency allows the occurrence of significant effects which are identified in the Final SEIR but are not avoided or substantially lessened, the agency must issue a Statement of Overriding Considerations setting forth the specific reasons to support its actions based on the Final SEIR or other information in the record; and

WHEREAS, CEQA Guidelines Section 15093(c) provides that if an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the Notice of Determination.

WHEREAS, The results from the 2025 FTIP and 2024 RTP emissions analysis show that current and future emissions of the ozone precursors ROG and NOx will be no greater than the 2011 and 2017 base year emissions levels. Thus, Butte County, in accordance with the Transportation Conformity Rule requirements applicable to Butte County (§51.464 and §51.436 – 51.440), has satisfied the “no-greater-than-2011” test for the 2008 8-hour federal ozone NAAQS and the “no-greater-than-2017” test for the 2015 8-hour federal ozone NAAQS. **Based on this analysis, the 2024 Regional Transportation Plan (RTP) and 2025 Federal Transportation Improvement Program (FTIP) Amendment #1 conform to the applicable State Implementation Plan (SIP) and all applicable sections of the EPA’s Transportation Conformity Rule.**

NOW, THEREFORE, BE IT RESOLVED that:

1. The Butte County Association of Governments finds as follows:

(a) The Final Supplemental Environmental Impact Report (SEIR) prepared for the 2024 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) for the Butte County region was completed in compliance with the California Environmental Quality Act; and

(b) The Final SEIR was presented to BCAG's decision making body, the BCAG Board; and

(c) The BCAG Board has reviewed and considered information contained in the Final SEIR; and

(d) The Final SEIR reflects BCAG's independent judgment and analysis; and

(e) The Final SEIR consists of the Draft SEIR and the Final SEIR, which includes a Mitigation Monitoring and Reporting Program; and

2. Based on and incorporating all of the foregoing recitals and findings supported by substantial evidence in the record and set forth in the "Findings and Statement of Overriding Considerations," attached hereto and incorporated by reference, BCAG hereby certifies the Final SEIR for the 2024 RTP/SCS and adopts the Mitigation Monitoring and Reporting Program; and

3. BCAG hereby approves the Butte County 2024 Regional Transportation Plan and Sustainable Communities Strategy and Air Quality Conformity Determination.

BE IT FURTHER RESOLVED, that the BCAG BOARD of Directors finds that the RTP/SCS achieves the regional greenhouse gas targets established by the California Air Resources Board and meets the requirements of SB 375;

BE IT FURTHER RESOLVED that the BCAG Board of Directors authorizes its staff to make any necessary changes to the RTP/SCS document to ensure the timely delivery and approval of the RTP/SCS to the appropriate state and federal agencies;

PASSED AND ADOPTED by the Butte County Association of Governments on the 12th day of December 2024 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

APPROVED:

BILL CONNELLY, CHAIR
BUTTE COUNTY ASSOCIATION OF GOVERNMENTS

ATTEST:

ANDY NEWSUM, EXECUTIVE DIRECTOR
BUTTE COUNTY ASSOCIATION OF GOVERNMENTS

BUTTE COUNTY ASSOCIATION
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING
ITEM #7



BCAG Board of Directors

Agenda Item #7 – Action

Date: December 12, 2024

Subject: Public Hearing for the Unmet Transit Needs Process FY 25/26

Contact: Victoria Proctor, Transportation Analyst

Summary: As the administrator of Transportation Development Act (TDA) funds for Butte County, BCAG is charged with performing the annual Unmet Transit Needs (UTN) process. This process requires at least one public hearing for the purpose of soliciting comments on unmet transit needs that may exist within the jurisdictions.

The 30-day outreach and comment period to identify unmet transit needs was started on October 24th and promoted through signs on all the fixed route buses, advertisement posts on social media, newspaper posting in Chico, Oroville, Paradise, and Gridley, as well as a targeted email sent out to our distribution list. All comments received will be given equal consideration in the assessment.

The purpose of this process is to ensure all unmet transit needs that are reasonable to meet are met before funds are expended for non-transit uses, such as streets and roads. Once the testimony is obtained, it is analyzed to determine if there are any transit needs that meet the adopted definitions of “Unmet Transit Need” and “Reasonable to Meet.” This analysis report, called the Transit Needs Assessment, is reviewed by the Social Services Transportation Advisory Council (SSTAC), which provides a recommendation for Unmet Transit Needs Findings to the BCAG Board of Directors. If the Board determines there are unmet transit needs that are reasonable to meet, the affected jurisdiction must satisfy those needs before any TDA funds may be expended for non-transit purposes.

Action requested: Staff recommends the Board open the public hearing to obtain testimony on any unmet transit needs that may exist inside Butte County.

Attachment: None

BUTTE COUNTY ASSOCIATION
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING
ITEM #8



BCAG Board of Directors

Agenda Item #8 – Information

Date: December 12, 2024

Subject: Sustainable Communities Strategy Statewide Coordination Request

Contact: Andy Newsum, Executive Director

Summary: Every four years, BCAG develops a Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). The 2024 RTP and SCS were prepared and adopted by the BCAG Board following current guidelines.

In light of increased scrutiny regarding state policies on greenhouse gas (GHG) emissions and unmet state reduction goals, all 18 Metropolitan Planning Organizations in California have sought a collaborative consultation with the California Air Resources Board. This engagement aims to enhance the development of effective policies and strategies for achieving meaningful GHG reductions that MPOs can work with local jurisdictions to implement. Staff will continue to update the Board in coming months as communication with CARB continues.

Action requested: Presented for information.

Attachments:

- Staff Report
- MPO Letters to the CARB

Item #8 – Information

Staff Report:

Background:

Senate Bill 375 (SB 375), adopted as chapter 728 of the Statutes of 2008, was enacted with the intent to enhance California's ability to reduce greenhouse gas (GHG) emissions through regional planning efforts. The bill mandated that Metropolitan Planning Organizations (MPOs) develop Sustainable Communities Strategies (SCS) as a core component of their regional transportation plans. The overarching goal was to align land use planning and transportation investments with GHG reduction targets, fostering more sustainable, equitable communities throughout the state.

Original Intent of SB 375

The original intent of SB 375 was multifaceted. Primarily, the legislation aimed to:

1. **Reduce GHG Emissions:** Encourage a reduction in GHG emissions from passenger vehicles by promoting land use patterns and transportation systems that reduce reliance on driving.
2. **Integrate Planning Processes:** Foster collaboration among state agencies, MPOs, and local governments to create integrated plans that address environmental sustainability, public health, and economic vitality.
3. **Improve Transit-Oriented Development:** Stimulate development patterns that support greater accessibility to public transit, thereby reducing vehicle miles traveled (VMT) and associated emissions.
4. **Enhance Regional Collaboration:** Promote cooperative regional planning efforts to ensure that communities work jointly toward achieving state-mandated GHG reduction targets.

Shortcomings in Addressing GHG Reductions

Despite its ambitious goals, SB 375 has faced criticism for its failure to deliver meaningful GHG reductions. A few key factors contributing to this shortfall include:

1. **Inadequate Measurement and Accountability:** While SCSs are intended to outline strategies for lowering GHG emissions, the metrics for measuring effectiveness and accountability have proven insufficient. Many regions have struggled to quantify the exact impact of their strategies on GHG emissions reductions.
2. **Limited Authority and Resources:** MPOs often lack the regulatory authority and resources necessary to enforce land use policies that support the goals of SB 375, leading to fragmented implementation across different jurisdictions.
3. **Implementation Challenges:** Local governments may prioritize short-term economic benefits or development interests over long-term sustainability goals, resulting in developments that do not align with the objectives of SB 375.
4. **Changing Landscape of State Policies:** The evolving nature of state policy regarding emissions and environmental targets often results in confusion about compliance and adaptation, further complicating the effective implementation of SCSs.

The Call for Reevaluation

In response to these shortcomings, the 18 Metropolitan Planning Organizations in California have collectively expressed concerns about the existing application of California Air Resources Board (CARB) policies and criteria that define Sustainable Communities Strategies. Their request for a pause in the implementation of these policies is rooted in several considerations:

1. **Desire for Comprehensive Policy Review:** MPOs advocate for a thorough evaluation of current policies, emphasizing the need to reassess existing frameworks to ensure they effectively target GHG reductions.
2. **Collaboration with CARB:** The MPOs have called for a collaborative consultation process with the California Air Resources Board to engage in meaningful discussions about revising and improving the existing criteria and policies aimed at achieving GHG reductions.
3. **Holistic Approach:** There is a growing consensus that achieving GHG reduction goals requires a more holistic approach that considers not only transportation and land use but also the integration of housing, economic, and social policies.
4. **Accountability and Transparency:** MPOs seek to establish clearer measurement criteria and accountability mechanisms to track progress effectively and ensure that strategies are producing the intended environmental benefits.

The California Association of Council of Governments and all 18 Metropolitan Planning Organizations have written letters to the CARB and are attached and identified as follows:

- CALCOG Comment Letter on SCS guidelines
- Joint MTC, SACOG, SANDAG and SCAG aka “The Big 4”
- Joint Central Coast MPO Letter
- Joint Shasta, Butte and TRPA Letter
- San Joaquin Valley MPO Letter

Responses to the above letter from CARB as well as a general overview of the effort to engage CARB for ongoing collaboration can be found at:

[Why Are MPOs Seeking a Pause on SB 375 Target Setting? : California Association of Councils of Governments](#)

It is universally recognized SB 375 represented a significant effort to align transportation planning with state GHG reduction goals. However, the realization of its intent has been hampered by implementation challenges and inadequate measurement frameworks. The call by the 18 Metropolitan Planning Organizations to pause existing CARB policies reflects a broader commitment to developing a more effective, collaborative framework for achieving sustainable communities and meaningful GHG reductions in California. Enhanced dialogue and cooperative strategies are essential for addressing these critical environmental challenges and ensuring the long-term viability of California's climate goals.

September 17, 2024

Honorable Steven S. Cliff, PhD.
Executive Officer
California Air Resources Board
Sacramento, California

Re: [Updates to CARB's Sustainable Communities Strategy Evaluation Process](#)

Dear Dr. Cliff:

Thank you for the opportunity to provide comments on CARB's proposed amendments to its Sustainable Communities Strategy (SCS) evaluation process. The membership of the California Association of Councils of Governments (CALCOG) includes all 18 Metropolitan Planning Organizations (MPOs) that are required to submit a SCS as part of the regional transportation plan (RTP).

At the outset, we acknowledge that a strong state and regional partnership is necessary for the success of SB 375. During the 15 years it has been in effect, MPOs and CARB have shared successes and acknowledged areas that can be improved. The structure of SB 375 demands a continued working partnership between us.

We are therefore disappointed in the proposed amendments to the SCS Guidelines, which focus only on what CARB needs from MPOs. We share these comments in this letter with a hope that we can improve on the collaboration between CARB and MPOs, which we believe will result in better outcomes both for our regions and the state.

I. Request for a "Roll-Up-Our-Sleeves" Problem Solving Dialogue

We understand the logic behind several of the proposed amendments to the Guidelines. But they fail to address changes that would also support MPOs in the implementation of SB 375. Accordingly, we seek that CARB convene a working group of MPO and CARB technical staff to engage in an *open, two-way* government-to-government discussion to discuss how the process can work best for CARB and MPOs. The agenda should be jointly developed and focus on effective ways to share information to achieve multiple state and regional goals.¹

¹ CARB staff scheduled a virtual meeting with MPO planning directors in May. The main portion of the meeting was a scripted PowerPoint presentation that outlined the concepts for the proposed changes to the guidelines. Specific language was not shared. Many MPO attendees were hearing these concepts for the first time. CARB did not provide an advance means of allowing MPO staff to include items on the agenda.

We suggest a “roll-up-our-sleeves” dialogue because the Guideline amendments concern how MPO and CARB staff share information (and focus less on policy change). Obviously, all ideas must be vetted through a public comment period. But improvements in CARB-to-MPO coordination that could emerge from this process would yield better outcomes.

II. Special Issues Related to Submitting the Technical Methodology

The SCS Guidelines (original and proposed) do not address a structural shortcoming in the language of SB 375.² Specifically, what does it mean to submit a full technical methodology (TM) prior to commencing public participation?

Robust public engagement yields important feedback and new ideas. It also creates equity through the inclusion of often overlooked voices and ideas. Almost by definition, an RTP/SCS will look different at the end of a public engagement process than it did in the beginning. But SB 375 oddly requires the entire TM at the beginning, prior to the start of public engagement. Of course, SB 375 was written by people who never had to submit a TM for an SCS. Thus, we should not be surprised that the language falls short of what we might draft with the benefit of three rounds of RTP/SCS development.

This problem has grown with each SCS submittal as CARB seeks more and more detail earlier in the process. We understand why CARB would want as much information as possible so early in the process. But a completed TM prior to public participation is a high bar. Unfortunately, CARB’s proposed amendments to the SCS Guidelines go a step further, asking for data six months before the start of public participation. More concerning, the amendments advise MPOs not to share preliminary figures—even with elected official board members—until they have been reviewed by CARB. This is not a way to run an MPO that is accountable to locally elected officials and engaged stakeholders.

These amendments also undermine public engagement. Taken literally, MPOs would be unable to seek public input on critical early topics like goal-setting or visioning – even those unrelated to greenhouse gas quantification. Development of potential SCS strategies would have to be conducted as an internal planning process with after-the-fact input from stakeholders. This conflicts with federal planning requirements to have an open public process. Prohibiting early engagement would also perpetuate institutional barriers that have historically prevented minority and low-English-proficiency persons from effectively participating in the decision-making process, in conflict with federal Title VI requirements.

Also disappointing, the proposed revisions suggest that the SCS process is a staff-to-staff technocratic exercise focused on a single policy goal (achieving a GHG emission reduction target). These revisions would narrow or eliminate the ability for MPOs to conduct early

² Despite our call for a roll-up-our-sleeves, problem solving conversation, we proceed with specific comments because the formal nature of the comment process dictates that we get these comments on the record.

scenario planning & strategy exploration to consider the impacts of policy decisions on a suite of other important policy goals and limit them from bringing timely updates to their boards on draft iterations of the SCS.

These provisions should not be added to the Guidelines. They interfere with an MPOs ability to successfully implement SB 375 as the Legislature envisioned and the state's residents expect. The dialogue we recommend in section one might cover subjects like: What information does CARB really need 24 to 48 months prior to the adoption of the plan? What can MPOs reasonably produce? How do MPOs conduct robust public engagement that builds trust? And generally, how can the process be improved to get needed information to CARB in a way that is not too onerous in terms of time and model runs for MPOs?

These are conversations worth having. We appreciate the note at the end of Appendix A of the SCS Guidelines that provides a starting point for the discussion: "... RTP/SCS scenarios are developed through a robust public process. Upon submission of the *Technical Methodology*, CARB will receive the level of detail available at the time of submission with more detail forthcoming." Being clear about what is needed at the beginning and greater acknowledgment that the plans are subject to change based on feedback from the public and MPO policy makers is a good place to start those conversations.

III. The SCS Guidelines Do Not Create Needed Accountability

The revisions omit needed accountability measures to ensure CARB does not create unwarranted delays. Here is the crux from the MPO perspective: CARB is taking too long (in months) to finalize its determinations. The statute states that CARB has 60 days to complete its review. Based on information posted on CARB's website and collected from an inquiry to our members, the shortest review time by CARB in the last round of SCS submittals was 11 months. Some reviews have been pending for more than two years! A summary table of review times by MPO is provided in Exhibit A.

In the current round of SCS review, none of the 18 MPOs have received a notice of acceptance/rejection of their SCS within the 60-day period. Now that an "approved SCS" is required for certain funding sources, the lack of an approved SCS can stand in the way of vital projects that could be helping to advance the state's greenhouse gas reduction goals. Unfortunately, there is nothing in the proposed guidelines to speed up the CARB review timeline (though the next Section includes a possible fix).

IV. Three Amendments to Improve Process Certainty

While we continue to believe that this process include a *Role-Up-Our-Sleeves Problem Solving Dialogue* requested in Section 1, we provide three language changes that would restore more trust and accountability to the process from the MPO perspective.

1. Assuring Timely Responses from CARB to Submitted TMs.

We appreciate that CARB has replaced the phrase “timely manner” in providing written comments about the TM to a more certain “within 45 days.” But as Exhibit A highlights, a general time limit is not enough. Given that MPOs have a deadline for updating their RTPs under federal law (reinforced under state housing law), the window for CARB to provide comments must be more certain. We would propose the following concept:

CARB will respond to the MPO in writing within 45 calendar days. The response shall either deem the Technical Methodology submitted by the MPO as either sufficient or insufficient. If deemed insufficient, CARB shall specifically describe the additional information that should be added to the Technical Methodology as well as remedies needed to quantify acceptable estimates of GHG emission consistent with the Technical Submission Template and Guidance. CARB shall not request information that is not included in the version of the Technical Methodology Submission Template and Guidance in effect six months prior to the start of the MPO’s public participation process. If CARB fails to provide a response within 45 calendar days, the MPO’s TM shall be deemed sufficient. CARB must provide a similar notice for subsequent submittals of the technical methodology that are in response to earlier submittals deemed insufficient by CARB.

2. Assuring Timely Reviews of an SCS

The following concept language would help address the current weakness of the system that leads to delays in certifying whether an SCS would achieve the target:

Upon submission of the final SCS, CARB shall review the submittal for completeness and identify what, if any, additional information is needed to make a final determination on the SCS within 15 business days. An MPO need only submit information that is reasonably required to meet the requirements listed in the versions of *Appendix A: Technical Methodology Submission Template and Guidance* (if it has not been deemed sufficient), *Appendix B: Additional Details for Model Sensitivity Tests*, and *Appendix D: Guidance of Technical Issues* that are in effect six months prior to the start of the public participation process.

If an MPO that has already submitted a “sufficient” Technical Methodology does not receive a timely determination on the completeness of the SCS submission, the submission will be deemed complete, and CARB must accept the MPO’s conclusions included in the submitted SCS. Once a SCS submittal is deemed complete, CARB staff will finalize its determination of whether the SCS would achieve the GHG emission reduction target if implemented within 45 business days. This period can be extended for 30 business days if CARB provides written notification to the MPO in advance of the 45-day deadline.

3. Certainty for Participation Related to Other State Programs

The proposed amendments advise MPOs to plan for other state programs and refers to eligibility for the Solutions for Congested Corridors program. This language does not address a scenario where a grant application is due and CARB has missed the 60-day limit to certify that the SCS. Accordingly, we recommend the following:³

While state law does not specify when a submittal to CARB staff occurs, MPOs are advised to plan for timelines regarding State programs requiring CARB's acceptance of an SCS for funding eligibility. If CARB has not made a determination of whether the SCS will achieve the GHG emission reduction target within 45 business days of a submission being deemed complete, CARB shall issue a temporary determination with three days of receiving a written request from an MPO upon a showing that such a finding is necessary to be eligible for a funding program or similar dependency on having a SCS that has been certified by CARB. The temporary determination shall state that the SCS achieves the GHG gas emission targets for purposes of funding program eligibility or similar dependency identified by the MPO. The temporary determination shall be in effect for 180 days. If CARB still has not made a determination at the end of a temporary determination, CARB shall issue new temporary determinations until a final determination has been made.

IV. Conclusion

We share ARB's interest in improving implementation of SB 375. While we have offered some specific suggestions to improve the guidelines, the state's MPOs request that CARB engage in mutual and open government-to-government dialogue.

Thank you for the time and consideration. Please don't hesitate to reach out to me if you have any questions [sabrina@calcog.org | (530) 864-8544].

Sincerely,



Sabrina Bradbury
Director of Government Affairs

³ The way these amendments work together is that CARB has 15 days to determine whether the SCS submission is complete and then 45 business days to make the determination. This language would require CARB to issue a temporary determination during the 30-business day extension. This is intentional because CARB's option to extend its review should not affect MPO eligibility for other programs.

Exhibit A

MPO	SCS Submittal	Final Determination	Review Time
Association of Monterey Bay Area Governments	Jul-2022	Pending	25+ Months
Fresno Council of Governments	Oct-2022	Pending	22+ Months
Kern Council of Governments	Nov-2022	Pending	21+ Months
Kings County Association of Governments	Dec 2022	Pending	20+ Months
Merced County Association of Governments	Apr-2023	Pending	16+ Months
Metropolitan Transportation Commission	Nov-2021	Nov-2022	12 Months
Sacramento Area Council of Governments	Nov-2019	Oct-2020	11 Months
San Diego Association of Governments	Oct-2023	Pending	10+ Months
San Joaquin Council of Governments	Nov 2022	Pending*	22+ Months
San Luis Obispo Council of Governments	Aug-2023	Pending	12+ Months
Santa Barbara County Association of Governments	Oct-2021	Jan-2023	15 Months
Southern California Association of Governments	Jul-2024	Pending	2+ Months
Stanislaus Council of Governments	Dec-2022	Pending*	21+ Months
Tulare County Association of Governments	Nov 2022	Pending	22+ Months
Tahoe Regional Planning Agency	Jul-2021	May-2023	22 Months

* San Joaquin Council of Governments reports hearing a “verbal approval” from CARB staff but still has not received anything in writing. Stanislaus Council of Governments reports an “email approval” but has not received any of the formal documents that usually come with a final determination.

Note. This chart accounts for fifteen of the eighteen MPOs. Three of the smallest MPOs—Shasta Regional Transportation Planning Agency, Butte County Association of Governments, and Madera County Transportation Commission—have not provided full submissions due to internal (staff capacity; resources) and external (in the case of Butte, the Camp Fire) reasons.



September 27, 2024

Dr. Steve Cliff
Chief Executive Officer
California Air Resources Board
Sacramento, CA 95814

Re: Pause Current SB375 Targets and SCS Guidelines to Allow a Holistic Review of SB 375 Framework

Dear Dr. Cliff:

The state's three smallest Metropolitan Planning Organizations (MPOs) request the opportunity to partner with the California Air Resources Board (CARB), California Transportation Commission (CTC), Caltrans, and the Department of Housing and Community Development (HCD), along with the other fifteen California MPOs, to holistically review the Senate Bill 375 (SB 375) Framework to improve how state and regional agencies collaborate to deliver multiple housing, climate, and transportation goals.

SB 375 PROVIDES A FOUNDATION FROM WHICH THE STATE CAN MOVE FORWARD

At the outset, we note that SB 375 has changed the collaborative regional transportation planning process for the better. With each iteration after our first Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) we have seen better integration of land use, housing, and transportation policies, supporting better transportation and quality of life outcomes for our residents. Importantly, the public has become more involved in the development of these plans, resulting in projects that are more responsive to our communities' needs. This progress can serve as a foundation for further improvements in the state and regional planning framework.

BUT THE TIME IS RIGHT TO REVISIT THE SB 375 PLANNING FRAMEWORK HOLISTICALLY

A lot has changed since SB 375's adoption in 2008. The state, through the adoption of various policies and programs, has accelerated transportation electrification such that almost one in four new cars sold would be zero emission when fully implemented. Under SB 743, vehicle miles traveled has replaced level-of-service as a critical evaluation metric for transportation projects large and small. The state has also adopted substantial legislative changes to address a state housing crisis. In addition, the global pandemic fundamentally altered travel patterns and land use preferences – creating headwinds that were unforeseen when the law was designed or when targets were last set by the CARB Board.

Thanks to state programs to support affordable housing and sustainable communities, active transportation, goods movement, maintaining facilities in a state of good repair, and transit improvements, as well as the Regional Early Action Planning (REAP) program, partial funding is

available to support critical housing and transportation needs needed to achieve ambitious state and regional goals. But as the SB 150 report acknowledged, funding and staffing for implementation remains far short of what is needed to fully implement these regional plans. A restructured planning process can shift the focus toward implementation and thereby deliver faster and more effective results.

WE REQUEST A COLLABORATIVE EFFORT TO CONDUCT A HOLISTIC REVIEW OF THE SB 375 FRAMEWORK

We request that CARB, CTC, Caltrans, and HCD work with the MPOs to comprehensively evaluate the SB 375 framework. This effort will require us to engage in a deep and effective dialogue about the best way to achieve the suite of state and regional housing, climate, and transportation-related objectives, including reducing greenhouse gas (GHG) emissions, that is context appropriate for the state and each region. As part of this request, we ask that CARB pause the current SCS guidelines and SB 375 targets process to allow for a robust and collaborative conversation about the best path forward in the coming months.

To demonstrate our commitment to this concept, this letter represents the collective submission of comments by the undersigned MPOs for both the proposed amendments to the SCS guidelines (comments requested by CARB by August 30th) and the request for information related to the target setting (preliminary data questionnaire requested by CARB by October 30th). The time is right to develop more robust implementation solutions that will fit state, regional, and local objectives. Thank you for your consideration.

Sincerely,



Andy Newsum
Executive Director
Butte County Association of Governments



Sean Tiedgen
Executive Director
Shasta Regional Transportation Agency



Nick Haven
MPO Director
Tahoe Regional Planning Agency

Cc: Tomiquia Moss, Secretary, California Business, Housing and Consumer Services
Toks Omishakin, Secretary, California State Transportation Agency
Sam Assefa, Director, Office of Planning and Research
Tony Tavares, Director, California Department of Transportation
Tanisha Taylor, Executive Director, California Transportation Commission
Gustavo Velasquez, Director, California Department of Housing & Community Development

October 15, 2024

Dr. Steve Cliff
Chief Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Pause Current SB 375 Targets and SCS Guidelines to Allow a Holistic Review of SB 375 Framework

Dear Dr. Cliff:

The eight metropolitan planning organizations (MPOs) of the San Joaquin Valley request a partnership with the California Air Resources Board (CARB), California Transportation Commission (CTC), Caltrans, and the Department of Housing and Community Development (HCD) to holistically review the SB 375 framework to improve how state and regional agencies collaborate to deliver multiple housing, climate, and transportation goals. The San Joaquin Valley MPOs serve a region with eight counties and 63 cities, whose collective population numbers more than 4.3 million residents. Those counties -- Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare -- are home to some of the most disadvantaged communities in the state and share an air basin challenged by weather and topography that creates an ideal setting for extreme air pollution. Our MPOs are sensitive to the need for greenhouse gas reductions and are committed to SB 375's intent.

SB 375 Provides A Foundation from Which the State Can Move Forward

SB 375 has improved regional transportation planning by emphasizing more significant investments in multimodal transportation and better coordination with housing developments. With each new iteration of the Sustainable Communities Strategy (SCS), we have seen better integration of land use, housing, and transportation policies, supporting better climate and quality of life outcomes for our residents. Notably, the public has become more involved in developing these plans, making projects more responsive to our communities' needs. This progress should be a foundation for further state and regional planning improvements.

But The Time Is Right to Revisit the SB 375 Planning Framework Holistically

Much has changed since SB 375's adoption in 2008. The State has accelerated transportation electrification through Advancing Clean Cars II, so that almost one in four new cars sold is zero emission. Under SB 743, vehicle miles traveled have replaced level-of-service as a critical success metric for transportation projects large and small. The state has also adopted substantial legislative changes to address the state's housing crisis. In addition, the global pandemic fundamentally altered travel patterns and land use preferences -- creating headwinds unforeseen when the law was designed or when the CARB Board last set targets.

Thanks to state programs to support affordable housing and sustainable communities, active transportation, and transit improvements, as well as the Regional Early Action Planning (REAP) programs, partial funding is available to support critical housing and transportation needs needed to achieve our ambitious goals. However, as the SB 150 report acknowledged, funding and staffing for implementation remain far short of what is required to implement these regional strategies to the maximum extent. A restructured planning process can shift the focus toward implementation, thereby delivering faster and more effective results.

Work Collectively Towards Pragmatic Solutions

The San Joaquin Valley resides in a non-attainment air district. Our constituents suffer from poor air quality that is predominantly caused by our geographic bowl-shaped valley, walled off by mountains, weather patterns (winds blowing West to East), vast agricultural farmland, heavy goods movement traffic, and the jobs-housing imbalance, leading hundreds of thousands of daily commuters into the Bay Area and Los Angeles basin.

Density is an issue in the Valley regarding transit use and support. The Bay Area has a population of 6.8 million over 7,300 square miles, and Los Angeles County has 10 million people living over 4,700 square miles. In contrast, the Valley has 4.3 million people spread over 27,000 square miles. The Bay Area has nearly 60 percent more people living in an area a quarter the size of the Valley. Los Angeles has more than 2.5 times the population, over 1/6 of the area. Valley MPOs bear the burden of addressing heavy traffic that is not locally generated. Given our density profile, the one-size-fits-all application of VMT metrics exacerbates our ability to meet goals. Proportionality must be applied to assess VMT reduction, which was never intended for rural and suburban jurisdictions. Otherwise, by default, not meeting metrics designed for urban areas will send all the money to other parts of the state that do not have similar air quality concerns. Through the enactment of SB 768 (chaptered 9/27/24), we hope that the Department of Housing and Community Development's study of VMT will assist with SB 375 compliance. As a result, realistic expectations of what targets can be met and assessments of what types of pragmatic investments would yield the most favorable results per region must be made. The Valley has been innovative by introducing a VMT banking system concept to help offset emissions.

Furthermore, exogenous factors such as revised population growth estimates will substantially impact any plan's ability to deliver GHG reductions per capita. At the outset of SB 375, population growth within the San Joaquin Valley was expected to be greater than 1.1 million residents between 2020 and 2035 (i.e., a 24.5% increase). According to the latest estimates from the California Department of Finance, Valley growth over this period is expected to be less than 300,000 new residents (i.e., a 6.6% increase). This will hamstring the Valley as it strives to make GHG reductions per capita – new tools and measurements are needed to make progress.

All eight MPOs in the San Joaquin Valley strongly support California's climate goals and are deeply committed to improving passenger and freight rail systems, reducing GHG and vehicle miles traveled (VMT) where feasible, and improving public transportation, walking, biking, and other modes of transportation. Our region also supports transportation investments that are aligned with housing and economic development. While we strongly support addressing climate change, success will require creative, flexible, and pragmatic solutions for each region's unique opportunities and challenges.

The San Joaquin Valley has six counties with local sales tax measures dedicated to transportation. Still, it has been challenging to renew measures in Fresno and Madera to retain our ability to partner in advancing climate and mobility goals. Concurrently, gas tax revenue has been eroding, further inhibiting our ability to invest in multimodal

investments, transit-oriented development, and maintaining the basic infrastructure needed to support safety and mobility on local streets and roads and the state highway system. The San Joaquin Valley MPOs agree philosophically, we should not depend on petroleum production to help fund our infrastructure needs. We must focus on an equitable gas tax successor source, especially for our disadvantaged communities, that will provide predictability, stability, and an opportunity to balance funding to maintain investments to address safety, mobility, and air quality. The Cap-and-Trade program also needs to be extended to allow for continued investments into the Low Carbon Transit Operations Program (LCTOP) and Transit Capital and Intercity Rail Program (TIRCP) to complete passenger rail systems and augment first and last-mile bus service to make mode-shift more compelling.

Transit is expensive to build and operate and is not always a practical or efficient solution for a constituency's daily mobility needs. This is because transit typically lacks flexibility (traditional service is fixed-route service without options for route deviation and schedules), it can be unreliable, have long headways, and is sometimes limited or non-existent in more remote unincorporated areas. Greater resources are also needed to support micro-transit services, especially where traditional fixed route is not feasible and to support systems that offer transit services to our National Parks, such as the Yosemite Area Regional Transit System (YARTS).

Request to Conduct a Holistic Review of the SB 375 Framework

We request that CARB, CTC, Caltrans, and HCD work with MPOs to evaluate the SB 375 framework comprehensively. This effort will require us to engage in a deep and practical dialogue about the best way to achieve the suite of state and regional housing, climate, and transportation-related objectives, including GHG emission reductions. As part of this request, we ask that CARB pause the current SCS guidelines and SB 375 targets to allow for a robust and collaborative conversation about the best path forward in the coming months. However, should CARB be unable to pause SB 375 target setting due to statutory requirements, the Valley encourages CARB to re-establish existing targets for the Valley as a placeholder and identify new targets following the requested collaborative dialogue to reshape our collective SB 375 approach.

To demonstrate our commitment to this concept, this letter represents the collective submission of comments by the San Joaquin Valley MPOs for both the proposed amendments to the SCS guidelines (comments requested by CARB by Aug. 30) and the request for information related to the target setting (preliminary data questionnaire requested by CARB by Oct. 30). The time is right to develop more robust implementation solutions that fit state, regional, and local objectives.

We appreciate your consideration.

Sincerely,



Robert Phipps, Chair
San Joaquin Valley Regional Transportation Planning Agencies Directors' Committee
Interim Executive Director, Fresno Council of Governments

CC:

- Tomiquia Moss, Secretary, California Business, Housing and Consumer Services
- Toks Omishakin, Secretary, California State Transportation Agency
- Sam Assefa, Director, Office of Planning and Research
- Tony Tavares, Director, California Department of Transportation
- Tanisha Taylor, Executive Director, California Transportation Commission
- Gustavo Velazquez, Director, California Department of Housing & Community Development

September 23, 2024

Dr. Steve Cliff
Chief Executive Officer
California Air Resources Board
Sacramento, CA 95814

Re: Pause Current SB 375 Targets and SCS Guidelines to Allow a Holistic Review of SB 375 Framework

Dear Dr. Cliff:

The Central Coast Coalition requests the opportunity to partner with the California Air Resources Board (CARB), California Transportation Commission (CTC), Caltrans, and the Department of Housing and Community Development (HCD) to holistically review the SB 375 Framework to improve how state and regional agencies collaborate to deliver multiple housing, climate, and transportation goals. The Coalition comprises the Metropolitan Planning Organizations and Regional Transportation Planning Agencies for California's Central Coast.

SB 375 Provides A Foundation from Which the State Can Move Forward

At the outset, we note that SB 375 has changed regional transportation planning for the better. With each new iteration of the SCS, we have seen better integration of land use, housing, and transportation policies, supporting better climate and quality of life outcomes for our residents. Importantly, the public has become more involved in developing these plans, resulting in projects more responsive to our communities' needs. This progress should be a foundation for further improvements in the state and regional planning framework.

But The Time Is Right to Revisit the SB 375 Planning Framework Holistically

A lot has changed since SB 375's adoption in 2008. The state has accelerated transportation electrification through Advancing Clean Cars II so that almost one in four new cars sold is zero emission. Under SB 743, vehicle miles traveled have replaced level-of-service as a critical success metric for transportation projects large and small. The state has also adopted substantial legislative changes to address the housing crisis. In addition, the global pandemic fundamentally altered travel patterns and land use preferences – creating unforeseen headwinds when the law was designed or when targets were last set by the CARB Board.

Thanks to state programs to support affordable housing and sustainable communities, active transportation, and transit improvements, as well as the Regional Early Action Planning (REAP) program, partial funding is available to support critical housing and transportation needs needed to achieve our ambitious goals. However, as the SB 150 report acknowledged, funding and staffing for implementation remains far short of what is needed to implement these regional plans fully. A restructured planning process can shift the focus toward implementation, delivering faster and more effective results.

Request to Conduct a Holistic Review of the SB 375 Framework

We request that CARB, CTC, Caltrans, and HCD work with MPOs to evaluate the SB 375 framework comprehensively. This effort will require us to engage in a deep and effective dialogue about the best way to achieve the suite of state and regional housing, climate, and transportation-related objectives, including reducing GHG emissions. As part of this request, we ask that CARB

pause the current SCS guidelines and SB 375 targets to allow for a robust and collaborative conversation about the best path forward in the coming months.

To demonstrate our commitment to this concept, this letter represents the collective submission of comments by the undersigned MPOs and RTPAs for both the proposed amendments to the SCS guidelines (comments requested by CARB by August 30th) and the request for information related to the target setting (preliminary data questionnaire requested by CARB by October 30th). The time is right to develop more robust implementation solutions that fit state, regional, and local objectives. Thank you for your consideration.

Sincerely,



Marjie Kirn, Executive Director
Santa Barbara Association of Governments



Pete Rodgers, Executive Director
San Luis Obispo Council of Governments



Todd Muck, Executive Director
Transportation Agency for Monterey County



Sarah Christensen, Executive Director
Santa Cruz Co. Regional Transportation
Commission



Binu Abraham, Executive Director
Council of San Benito County Governments



Maura Twomey, Executive Director
Association of Monterey Bay Area Governments

Cc: Tomiquia Moss, Secretary, California Business, Consumer Services and Housing Agency
Toks Omishakin, Secretary, California State Transportation Agency
Sam Assefa, Director, Office of Planning and Research
Tony Tavares, Director, California Department of Transportation
Tanisha Taylor, Executive Director, California Transportation Commission
Gustavo Velasquez, Director, California Department of Housing and Community Development
Sarkes Khachek, Director of Programming, SBCAG

September 20, 2024

Dr. Steve Cliff
Chief Executive Officer
California Air Resources Board
Sacramento, CA 95814

Re: Pause Current SB 375 Targets and SCS Guidelines to Allow a Holistic Review of SB 375 Framework

Dear Dr. Cliff:

The state's four largest Metropolitan Planning Organizations (MPOs) request the opportunity to partner with the California Air Resources Board (CARB), California Transportation Commission (CTC), Caltrans, and the Department of Housing and Community Development (HCD) to holistically review the SB 375 Framework to improve how state and regional agencies collaborate to deliver multiple housing, climate, and transportation goals.

SB 375 Provides A Foundation from Which the State Can Move Forward

At the outset, we note that SB 375 has changed regional transportation planning for the better. With each new iteration of the SCS, we have seen better integration of land use, housing, and transportation policies, supporting better climate and quality of life outcomes for our residents. Importantly, the public has become more involved in the development of these plans, resulting in projects that are more responsive to our communities' needs. This progress should be used as a foundation for further improvements in the state and regional planning framework.

But The Time Is Right to Holistically Revisit the SB 375 Planning Framework

A lot has changed since SB 375's adoption in 2008. The state has accelerated transportation electrification through Advancing Clean Cars II so that almost one in four new cars sold is zero emission. Under SB 743, vehicle miles traveled has replaced level-of-service as a critical success metric for transportation projects large and small. The state has also adopted substantial legislative changes to address a state housing crisis. In addition, the global pandemic fundamentally altered travel patterns and land use preferences – creating headwinds that were unforeseen when the law was designed or when targets were last set by the CARB Board.

Thanks to state programs to support affordable housing and sustainable communities, active transportation, and transit improvements, as well as the Regional Early Action Planning (REAP) program, partial funding is available to support critical housing and transportation needs needed

to achieve our ambitious goals. But as the SB 150 report acknowledged, funding and staffing for implementation remains far short of what is needed to fully implement these regional plans. A restructured planning process can shift the focus toward implementation and thereby deliver faster and more effective results.

Request to Conduct a Holistic Review of the SB 375 Framework

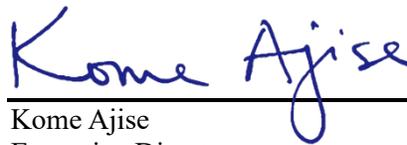
We request that CARB, CTC, Caltrans, and HCD work with MPOs to comprehensively evaluate the SB 375 framework. This effort will require us to engage in a deep and effective dialogue about the best way to achieve the suite of state and regional housing, climate, and transportation-related objectives, including the reductions of GHG emissions. As part of this request, we ask that CARB pause the current SCS guidelines and SB 375 targets to allow for a robust and collaborative conversation about the best path forward in the coming months.

To demonstrate our commitment to this concept, this letter represents the collective submission of comments by the undersigned MPOs for both the proposed amendments to the SCS guidelines (comments requested by CARB by August 30th) and the request for information related to the target setting (preliminary data questionnaire requested by CARB by October 30th). The time is right to develop more robust implementation solutions that will fit state, regional, and local objectives. Thank you for your consideration.

Sincerely,



Andrew Fremier
Executive Director
Metropolitan Transportation Commission



Kome Ajise
Executive Director
Southern California Association of Governments



Mario Orso
Chief Executive Officer
San Diego Association of Governments



James Corless
Executive Director
Sacramento Area Council of Governments

- CC:
- Tomiquia Moss, Secretary, California Business, Consumer Services, and Housing
 - Toks Omishakin, Secretary, California State Transportation Agency
 - Sam Assefa, Director, Office of Planning & Research / Land Use & Climate Innovation
 - Tony Tavares, Director, California Department of Transportation
 - Tanisha Taylor, Executive Director, California Transportation Commission
 - Gustavo Velasquez, Director, California Department of Housing & Community Development

BUTTE COUNTY ASSOCIATION
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING
ITEM #9



BCAG Board of Directors

Agenda Item #9 – Information

Date: December 12, 2024

Subject: FY 2023 Triennial Review of the Butte County Association of Governments as Prepared by the Federal Transit Administration

Contact: Andy Newsum, Executive Director

Summary: Every three years, the Federal Transit Administration (FTA) is required to perform reviews and evaluations in 23 areas in accordance with 49 U.S.C. Chapter 53. The review concentrated on procedures and practices employed during FY 2019/20, FY 2020/21, and FY 2021/22.

The Triennial Review is FTA's assessment of BCAG's compliance with federal requirements, determined by examining a sample of grant management and program implementation practices. Deficiencies were found in four (4) areas. There was one (1) repeat deficiency.

Action requested: Presented for information.

Attachments:

- Staff Report
- FY 2023 FTA Triennial Review Closeout Letter

Agenda Item #9 – Information

Staff Report

Purpose

The Triennial Review evaluates how recipients use federal funds and comply with FTA requirements. It also helps the FTA provide technical assistance and report to Congress, the Transportation Secretary, and other oversight agencies.

Frequency

The Triennial Review is mandated by Congress to occur every three years.

Areas of review

The Triennial Review examines a wide range of 23 areas, including financial management, technical capacity, maintenance, procurement, and civil rights. For the FY 2023 review of BCAG deficiencies were found in the following areas:

Findings

The review can result in findings of deficiency, which are areas where the grantee is not meeting federal requirements. For the FY 2023 review of BCAG deficiencies were found in the following areas:

- Financial Management and Capacity
- Satisfactory Continuing Control
- Procurement
- Disadvantaged Business Enterprise

Preparation

The FTA offers workshops, training materials, and other resources to help recipients prepare for the review.

Conclusion Summary

BCAG staff worked with FTA review staff over a period of 12 months to address deficiencies as noted above. On October 15, 2024, BCAG received a letter stating all deficiencies had been resolved and the FY 2023 Triennial Review for BCAG was closed. The letter is attached.



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IX
Arizona, California,
Hawaii, Nevada, Guam,
American Samoa,
Northern Mariana Islands

888 South Figueroa Street
Suite 440
Los Angeles, CA 90017-5467
213-757-5999 (Southern California)
415-734-9490 (Bay Area)

October 15, 2024

Andy Newsum
Executive Director
Butte County Association of Governments
326 Huss Dr Ste 150
Chico, CA 95928

Re: FY 2023 Triennial Review Closeout

Dear Mr. Newsum:

Thank you for the Butte County Association of Governments' (BCAG) documented responses to the deficiency findings reported in the Federal Transit Administration's (FTA) Fiscal Year (FY) 2023 Triennial Review in the areas of:

- 2. Financial Management and Capacity
- 7. Satisfactory Continuing Control
- 9. Procurement
- 10. Disadvantaged Business Enterprise

After FTA's review of BCAG's documentation, we conclude that BCAG sufficiently achieved the corrective actions and that no further correspondence is required. Attached is a copy of the findings summary with the closing dates for your records; this will also be indicated in BCAG's profile in [OTrak](#).

If you have any questions or comments, please contact your assigned FTA Oversight Review Coordinator, Philoki Barros, Transportation Program Specialist, at philoki.barros@dot.gov.

Sincerely,

For Ray Tellis
Regional Administrator

Attachment

**BUTTE COUNTY ASSOCIATION OF GOVERNMENTS (1627)
FY 2023 TRIENNIAL REVIEW**

Deficiencies

Deficiency Code	Review Area	Open Date	Original Due Date	Extended Due Date	Close Date	Status
F5-1 - Ineligible indirect costs charged to awards	Financial Management and Capacity	9/22/2023	12/29/2023		1/28/2024	Closed: Resolved
SCC9-1 - Failure to notify FTA of equipment removed from service	Satisfactory Continuing Control	9/22/2023	12/29/2023	3/28/2024	8/13/2024	Closed: Resolved
SCC9-2 - Non-permitted use of equipment disposal proceeds	Satisfactory Continuing Control	9/22/2023	12/29/2023	3/28/2024	8/13/2024	Closed: Resolved
P4-1 - Responsibility determination deficiencies	Procurement	9/22/2023	12/29/2023	3/28/2024	8/13/2024	Closed: Resolved
P11-1 - Missing FTA clauses	Procurement	9/22/2023	12/29/2023	3/28/2024	8/13/2024	Closed: Resolved
P12-4 - Contract files lacking signed Buy America certifications	Procurement	9/22/2023	12/29/2023	3/28/2024	8/13/2024	Closed: Resolved
P19-2 - Missing documentation of bus model testing	Procurement	9/22/2023	12/29/2023		9/22/2023	Closed: Resolved
P20-2 - Pre-award and/or post-delivery audits not performed	Procurement	9/22/2023	12/29/2023		9/22/2023	Closed: Resolved
DBE4-1 - Semi-annual DBE reports not submitted or not submitted timely	Disadvantaged Business Enterprise	9/22/2023	12/29/2023	10/2/2024	10/2/2024	Closed: Resolved
DBE11-1 - Unreported transit vehicle purchases	Disadvantaged Business Enterprise	9/22/2023	12/29/2023	10/2/2024	10/2/2024	Closed: Resolved

BUTTE COUNTY ASSOCIATION
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING
ITEM #10



BCAG Board of Directors

Agenda Item #10 – Information

Date: December 12, 2024

Subject: Transit and Intercity Rail Capital Program (TIRCP) Project Update Revision

Contact: Andy Newsum, Executive Director

Summary: On September 29, 2023, final guidelines for the SB 125 Formula Based Transit and Intercity Rail Capital Program (TIRCP) and Zero Emission Transit Capital Program (ZETCP) under the State of California Budget Act of 2023 were issued with BCAG's formula allocations totaling \$23,989,332. On July 8th, 2024, \$11,601,701 (approximately 50%) was disbursed and received for the development of the North Valley Rail environmental and design project components (TIRCP) and hydrogen mobile fueling together with 2 hydrogen fuel cell electric buses. The North Valley Rail project delivery timeline has extended, prompting consideration of a replacement project. Staff are assessing the feasibility of an inter-city/regional route, serving the Sacramento area, through coordination with Yuba Sutter Transit.

Action requested: Presented for information.

Attachments:

- Staff Report

Item #10 – Information

Staff Report:

Background: The Transit and Intercity Rail Capital Program (TIRCP) was established by Senate Bill (SB) 862 (2014) and later modified by SB 9 (2015) to provide grants from the Greenhouse Gas Reduction Fund (GGRF) for major improvements in California’s intercity, commuter, urban rail systems, and bus and ferry transit systems. These changes aim to significantly reduce greenhouse gas emissions, vehicle miles traveled, and traffic congestion. The legislation is codified in Sections 75220-75225 of the Public Resources Code (PRC). Assembly Bill (AB) 398 (2017) extended the Cap-and-Trade Program, which supports the TIRCP, until 2030. SB 1 (2017) continued to increase transportation funding, directing additional resources to the TIRCP from the Public Transportation Account (PTA).

AB 102 (2023) and SB 125 (2023) amended the Budget Act of 2023, appropriating \$4 billion from the General Fund to the TIRCP over the next two fiscal years, along with \$910 million from GGRF and \$190 million from PTA over four fiscal years to establish the Zero-Emission Transit Capital Program (ZETCP). These guidelines aim to expedite the distribution of funds to eligible projects.

BCAG Formula Allocation and Project Selection: On November 7, 2023, staff requested the full \$23,989,332 to support the North Valley Rail Project (NVRP) and hydrogen zero-emission infrastructure and buses. As of July 8, 2024, \$11,601,701 (approximately 50%) was disbursed, allocated as follows:

- North Valley Rail (TIRCP): \$10,488,545
- Zero Emission Deployment (ZETCP): \$1,113,156
- **Total funding:** \$11,601,701

On October 17, 2024, staff met with the San Joaquin Joint Powers Agency (SJJPA) to discuss the NVRP, state plans, and rail investment projects across California. Projects further along than the NVRP face significant budget and scheduling challenges, making the NVRP a lower priority. Project development timing relies on securing required partners and funding, which is not expected until at least FY 2026/27 – FY 2028/29.

Project Selection Change:

Given the delays in the NVRP, staff intends to utilize the disbursed funds effectively, as outlined in SB 125. To maximize the use of these funds, staff is exploring the development of alternative projects that can be initiated promptly while still reserving a substantial amount for the NVRP when it becomes a priority.

One potential project utilizes the Chico to Sacramento Inter-City Transit Strategic Plan, prepared in January 2022 with Caltrans and SJJPA. This plan evaluates a bus service that could integrate with existing rail services in Sacramento, connecting to destinations in the Bay Area and Central Valley. The study’s findings will help identify a possible service to connect regions within and north of Butte County through possible coordination with Yuba Sutter Transit service in Marysville for access to the Sacramento Airport, and downtown Sacramento.

This proposed service may require the capital purchase of up to three suitable vehicles and the development of a sustainable operating plan. Staff will coordinate with the California State Transit Agency (CalSTA) on this project revision and will provide additional updates to the Board.

BUTTE COUNTY ASSOCIATION
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING
ITEM #11



BCAG Board of Directors

Agenda Item #11 – Information

Date: December 12, 2024

Subject: Butte Regional Transit Marketing Plan

Contact: Sara Cain, Transit Manager

Summary: At the June 2024 BCAG Board of Directors meeting, staff informed the Board a consultant would be selected in the coming months to prepare a Marketing Plan for B-Line to promote new services, an updated logo, and promotional material to increase ridership. This project is part of B-Line's efforts to improve and market the system while encouraging residents to use public transportation.

On September 6, staff released a Request for Proposals to secure a consultant to develop the Marketing Plan. Seven proposals were received, and staff have selected the firm Transit Happy to lead the effort. The project will be completed mid-2025. Staff will continue to keep the Board updated as the study progresses.

Action requested: This item is presented for information.

Attachment: None.

BUTTE COUNTY ASSOCIATION
OF GOVERNMENTS



BOARD OF DIRECTORS MEETING
ITEM #12



BCAG Board of Directors

Agenda Item #12 – Information

Date: December 12, 2024

Subject: Butte Regional Transit 1st Quarter 2024/25 Report

Contact: Victoria Proctor, Transportation Analyst

Summary: Staff is presenting key operational data measuring the performance of the four different modes of service of the Butte Regional Transit (B-Line) system.

The chart below provides a statistical snapshot of the four modes for the first quarter of FY 2024/25. Ridership is reported to FTA monthly, while financial data is reported to FTA and Caltrans annually. Looking at the data quarterly allows staff to catch problems as they arise and manage expectations for future performance.

Ridership is down compared to the prior year first quarter in the urban fixed route and rural paratransit systems. Ridership increased compared to the prior year first quarter in the rural fixed route and urban paratransit systems. Staff continues to participate in outreach events to promote ridership.

Service	Farebox Coverage	Fares to Budget	Expense to Budget	Ridership Change from Prior Year	Passengers Per Hour
Rural Fixed Route	11.0%	26%	26%	+4.7%	6.8
Urban Fixed Route	9.0%	19%	24%	-3.7%	10.0
Rural Paratransit	5.4%	21%	25%	-8.5%	3.0
Urban Paratransit	7.3%	26%	29%	+13.5%	3.5

There were no preventable accidents in the quarter, with 354,323 miles driven. There were 5 valid complaints in the quarter with 164,438 rides given.

Action requested: This item is presented for information.

Attachment: Attachment #1 Financial Data; Attachment #2 Operational Data; Attachment #3 Ridership Chart

Butte Regional Transit
1st Quarter Financial Report
Fiscal Year 2024/25

	Rural Fixed Route					Urban Fixed Route				
	23/24 Actual to Date	% of 23/24 Budget	24/25 Annual Budget	24/25 Actual to Date	% of 24/25 Budget	23/24 Actual to Date	% of 23/24 Budget	24/25 Annual Budget	24/25 Actual to Date	% of 24/25 Budget
Passenger Fare	\$ 103,705	26%	\$ 422,529	\$ 108,437	26%	\$ 152,314	26%	\$ 665,546	\$ 128,478	19%
Other Income	\$ 2,994	0%	\$ 3,424,809	\$ 21,396	1%	\$ 4,491	0%	\$ 5,325,673	\$ 31,590	1%
Total Income	\$ 106,699	3%	\$ 3,847,338	\$ 129,833	3%	\$ 156,805	3%	\$ 5,991,219	\$ 160,068	3%
Operator Expense	\$ 490,056	25%	\$ 2,106,197	\$ 532,635	25%	\$ 1,071,788	25%	\$ 4,520,894	\$ 1,097,003	24%
Fuel Expense	\$ 164,129	31%	\$ 600,500	\$ 126,611	21%	\$ 116,146	32%	\$ 400,500	\$ 67,076	17%
Other Operating	\$ 183,913	23%	\$ 883,391	\$ 260,429	29%	\$ 179,200	24%	\$ 859,825	\$ 216,563	25%
Services & Supplies	\$ 838,098	25%	\$ 3,590,088	\$ 919,675	26%	\$ 1,367,134	26%	\$ 5,781,219	\$ 1,380,642	24%
Admin Charges	\$ 101,415	39%	\$ 257,250	\$ 63,421	25%	\$ 54,088	26%	\$ 210,000	\$ 51,772	25%
Total Expense	\$ 939,513	26%	\$ 3,847,338	\$ 983,096	26%	\$ 1,421,222	26%	\$ 5,991,219	\$ 1,432,414	24%
Fares to operating expense	11.0%		11.0%	11.0%		10.7%		11.1%	9.0%	
		% budget			% budget		% budget			% budget
Revenue Hours	5,174	25%	20,859	5,216	25%	11,315	25%	44,540	10,865	24%
Annual Passengers	33,989			35,590		112,799			108,579	
Annual Pass/Rev Hr	6.6			6.8		10.0			10.0	

Notes:

Other Income includes: TDA allocations, FTA grants, Interest, Proceeds from Sales, other miscellaneous income.

~FTA grant revenue is booked at year end and cash comes in the following fiscal year.

Service & Supplies include: Payments to Contactor, Fuel, Insurance, Maintenance, Marketing, and other minor expenses.

Butte Regional Transit
1st Quarter Financial Report
Fiscal Year 2024/25

	Rural Paratransit					Urban Paratransit				
	23/24 Actual to Date	% of 23/24 Budget	24/25 Annual Budget	24/25 Actual to Date	% of 24/25 Budget	23/24 Actual to Date	% of 23/24 Budget	24/25 Annual Budget	24/25 Actual to Date	% of 24/25 Budget
Passenger Fare	\$ 12,523	27%	\$ 48,950	\$ 10,444	21%	\$ 42,426	27%	\$ 177,321	\$ 46,903	26%
Other Income	\$ -	0%	\$ 706,800	\$ -	0%	\$ -	0%	\$ 2,060,889	\$ -	0%
Total Income	\$ 12,523	2%	\$ 755,750	\$ 10,444	1%	\$ 42,426	2%	\$ 2,238,210	\$ 46,903	2%
Operator Expense	\$ 133,698	24%	\$ 605,849	\$ 139,514	23%	\$ 301,106	20%	\$ 1,716,571	\$ 462,311	27%
Fuel Expense	\$ 14,876	27%	\$ 57,000	\$ 20,091	35%	\$ 47,108	29%	\$ 163,000	\$ 57,183	35%
Other Operating	\$ 24,190	38%	\$ 73,401	\$ 28,596	39%	\$ 93,139	40%	\$ 275,389	\$ 109,967	40%
Services & Supplies	\$ 172,764	25%	\$ 736,250	\$ 188,201	26%	\$ 441,353	23%	\$ 2,154,960	\$ 629,461	29%
Admin Charges	\$ 5,453	28%	\$ 19,500	\$ 3,902	20%	\$ 10,142	12%	\$ 83,250	\$ 16,902	20%
Total Expense	\$ 178,217	25%	\$ 755,750	\$ 192,103	25%	\$ 451,495	23%	\$ 2,238,210	\$ 646,363	29%
Fares to operating expens:	7.0%		6.5%	5.4%		9.4%		7.9%	7.3%	
		% budget			% budget		% budget			% budget
Revenue Hours	1,412	24%	6,000	1,375	23%	4,235	26%	17,000	4,579	27%
Annual Passengers	4,503			4,119		14,223			16,150	
Annual Pass/Rev Hr	3.2			3.0		3.4			3.5	

Notes:

Other Income includes: TDA allocations, FTA grants, Interest, Proceeds from Sales, other miscellaneous income.

~FTA grant revenue is booked at year end and cash comes in the following fiscal year.

Service & Supplies include: Payments to Contactor, Fuel, Insurance, Maintenance, Marketing, and other minor expenses.

B-Line Operating Data
FY 2024/25 - First Quarter

RURAL FIXED ROUTE

Quarter	Passengers			Vehicle Revenue Hours			Passengers per Revenue Hr		
	23/24	24/25	change	23/24	24/25	change	23/24	24/25	change
1st	33,989	35,590	4.7%	5,174	5,216	0.8%	6.6	6.8	3.9%
2nd	35,619			5,161			6.9		
3rd	34,801			5,212			6.7		
4th	37,031			5,226			7.1		

URBAN FIXED ROUTE

Quarter	Passengers			Vehicle Revenue Hours			Passengers per Revenue Hr		
	23/24	24/25	change	23/24	24/25	change	23/24	24/25	change
1st	112,799	108,579	-3.7%	10,967	10,865	-0.9%	10.3	10.0	-2.8%
2nd	125,543			11,276			11.1		
3rd	125,197			11,328			11.1		
4th	115,773			11,126			10.4		

RURAL PARATRANSIT

Quarter	Passengers			Vehicle Revenue Hours			Passengers per Revenue Hr		
	23/24	24/25	change	23/24	24/25	change	23/24	24/25	change
1st	4,503	4,119	-8.5%	1,412	1,375	-2.6%	3.2	3.0	-6.1%
2nd	4,595			1,324			3.5		
3rd	4,763			1,447			3.3		
4th	4,779			1,422			3.4		

URBAN PARATRANSIT

Quarter	Passengers			Vehicle Revenue Hours			Passengers per Revenue Hr		
	23/24	24/25	change	23/24	24/25	change	23/24	24/25	change
1st	14,223	16,150	13.5%	4,235	4,579	8.1%	3.4	3.5	5.0%
2nd	14,845			4,312			3.4		
3rd	14,882			4,602			3.2		
4th	15,825			4,708			3.4		

PREVENTABLE ACCIDENTS

Qtr-FY	Accidents	Miles	Ratio (1 per x)
1-24/25	0	354,323	#DIV/0!
4-23/24	0	364,112	#DIV/0!
3-23/24	1	365,542	365,541
2-23/24	2	348,739	174,369

VALID PASSENGER COMPLAINTS

Complaint	Rides	Ratio (1 per x)
5	164,438	32,887
3	173,408	57,802
7	179,643	25,662
4	180,602	45,150

B-Line Ridership Tracking

