STAFF REPORT

MEETING DATE:	**September 30, 2026**
SUBJECT:	**Receive Report on Legislative Activities Since June Board Meeting**
AGENDA ITEM:	**7-8**
STAFF CONTACT:	**Sean Tiedgen, Executive Director**

SUMMARY:

The board of directors provided direction on various bills at SRTA's April and June board of directors meetings. Staff participated in meetings and tracked the status of bills. A summary of the status of bills approved, rejected, or signed by the Governor as of September *24,* 2026, is provided below.

STAFF RECOMMENDATION:

It is recommended that the board of directors receive an update on current legislative activities and provide any direction to the executive director as appropriate.

DISCUSSION:

The state legislative session for the year ended August 31, 2026. July and August were busy months for staff who submitted letters on various bills and participated in meetings with regional partners to provide input. Below is a summary of federal and state legislative items of interest:

- **ACR 162 (Gallagher)** – On August 25, 2026, ACR 162 was chaptered by the California Secretary of State and made law. ACR 162 designates a portion of State Route 99 has been designated in Butte County as the Congressman Doug LaMalfa Memorial Highway. Caltrans will eventually post a website where individuals and organizations may donate funds for the necessary signage and infrastructure.
- **Sustainable Aviation Fuel Tax Credit** – The fuel tax credits were not included in FY 2026/27 state budget package. The SB1 local streets and roads program and trade corridor enhancement program (TCEP) funds, along with Caltrans' State Highway Operations and Protection Program (SHOPP) funds will not be reduced by this tax credit.
- **CalSTA – California Federal Surface Transportation Reauthorization Principles** – SRTA signed on to the California State Transportation Agency's (CalSTA) California Federal Surface Transportation Reauthorization Principles document per board of directors' approval at the June board meeting. A list of signatories can be found online here: Surface Transportation Reauthorization.
- **BUILD America 250 Act** – There is no new multi-year federal transportation bill expected to be passed by September 30, 2026.
    - The House Transportation and Infrastructure Committee passed their draft of the next multi-year federal transportation bill, named the BUILD America 250 Act. The bill is sitting in the House Appropriations Committee for review.
    - The Senate Committee on Environment and Public Works announced no draft "senate" version of a transportation bill will be provided until after the November 2026 elections.
- **Infrastructure Investment and Jobs Act (IIJA) Extension and Continuing Resolution** – On September 1, 2026, Congress passed a continuing resolution that extends transportation funding programs under IIJA at the same levels as Federal Fiscal Year 2026. The extension applies only

through December 11, 2026, of Federal Fiscal Year 2027. Funding will be pro-rated for the period. Based on the current status of the BUILD America 250 Act, another extension is expected.

- **SB 1087 (Cabaldon)** – This bill seeks to modernize SB375 requirements related to the Sustainable Communities Strategy (SCS) process for Metropolitan Planning Organizations (MPOs), oversight of the greenhouse gas (GHG) target setting process by the Air Resources Board, and minor changes to SB1 transportation funding programs. Various agencies and organizations submitted letters and provided feedback at Committee meetings. Final bill language was negotiated between the Governor's office acting on behalf of several state agencies, Senator Cabaldon, and the "Big 4" MPOs (MTC, SACOG, SANDAG, and SCAG). The bill was approved by the legislature on August 31 and is currently sitting on the Governors' desk for signature. The bill includes the following provisions:
  - **CARB Accountability –** requires more accountability through required publishing of data/reports, workshops, and public hearings as part of target setting process:
    - CARB must conduct at least two technical workshops and a public hearing related to the 2045 targets.
    - All available data and assumptions to be used for target setting must be provided at least 60 days before draft targets are published for public review. Requires CARB to conduct three public workshops and present targets at a board meeting for adoption.
  - **SCS Cycle and review:**
    - Move SCS planning process from four to eight years.
    - New implementation report in intervening Regional Transportation Plan (RTP) cycle.
    - CARB must review technical methodology and final RTP/SCS within 60 days. If CARB misses the 60-day deadline, the documents are automatically approved. Review of the final RTP/SCS is limited to four decisions: 1) determined meets regional target; 2) meets regional target with minor corrections; 3) not approved, with written findings to address ability to meet target; 4) not able to meet target with detailed reasons as to why.
    - Regional agencies may use virtual workshops to meet outreach requirements related to the development of the Sustainable Communities Strategy.
    - The SCS guidelines document must go through a public process that includes public workshops. CARB is required to consult MPOs, state agencies, and private industry for input, and hold a board meeting with a public hearing.
  - **GHG Targets**
    - Add a 2045 target year and remove the 2020 target year.
    - Bars new targets to apply if passed within 12 months of agency adopting a new RTP/SCS.
  - **SB 1 programs:** removes requirement of comprehensive multimodal plans for Solutions for Congested Corridors program and adds language to ensure projects align with regional RTP/SCS.
  - **Ends Alternative Planning Strategy (APS) Penalty** – If a region cannot meet its GHG target, the MPO prepares an APS to show what would be needed to achieve the target. Document is now part of the RTP and adopting an APS does not disqualify a region from applying for SB1 Trade Corridors Enhancement Program (TCEP) and Solutions for Congested Corridors (SCCP) grants.

ALTERNATIVES:
The board of directors may request additional information to be provided at a future meeting.

OTHER AGENCY INVOLVEMENT:
Staff shared information and received feedback from regional partners on the impact of proposed bills and related amendments. Staff worked with CalCOG and member agencies, and state legislative staff to share SRTA's perspective on bills including potential benefits and negative impacts. Updates were provided to the Technical Advisory Committee (TAC) on September 10, 2026.

FISCAL AND POLICY COMMITTEE:
///Staff provided a verbal update to the Fiscal & Policy Committee on September 21, 2026.///

FISCAL IMPACT:
There is no net fiscal impact to this action. Various bills recently signed or currently under consideration at the federal and state level may impact future agency operations or transportation project funding.

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Sean Tiedgen, AICP, Executive Director

Attachment: CalCOG SB 1087 Analysis Report

California Association of Councils of Governments

STAFF ANALYSIS · END-OF-SESSION AMENDMENTS

SB 1087 (Cabaldon): SB 375 Reform

CALCOG

SUMMARY

SB 1087 has been amended significantly before the end of the session. The remaining bill, although not perfect is still a win for SB 375 reform. Below is a detailed breakdown of the new version of the bill and CALCOG staff's analysis. Most CALCOG Members will recognize that this memo is an updated version of the staff report we shared with the membership at the end of June.

15 procedural changes reviewed	**11** assessed positive or very positive	**4** assessed neutral or neutral to positive	**0** rise to the level of concerning

What the bill does

- Moves the full Sustainable Communities Strategy to an **eight-year cycle**, with a scoped implementation progress report at the four-year midpoint in place of a new SCS.
- Extends CARB target years to **2035 and 2045**, strikes the 2020 target, and bars a new target from applying within a year of an SCS due date.
- Builds a **transparent target-setting process**: technical workshops, published methodology and assumptions, consultation with CTC, HCD, and Caltrans, and an express requirement to balance competing state objectives.
- Puts CARB on a **shot clock** — 60 days for methodology review and for each SCS determination, written deficiency findings, and an SCS deemed approved if CARB misses a deadline.
- Ends the **APS funding penalty**: an APS need no longer be a separate document, and adopting one no longer disqualifies a region from TCEP, and SCCP.
- Extends the SCS period from **four to eight years**, which should significantly reduce planning costs.

How to read this memo

A. Section-by-section matrix
Existing law, the change, and staff analysis, change by change.

B. Implementation report requirements
What the new midpoint report must contain — and what it does not.

C. APS eligibility for SB 1 programs
Effect on PTA planning funds, planning grants, TCEP, and SCCP.

D. General comments and observations
Staff's broader read on targets, eligibility, shot clocks, and reporting.

A. SCS Procedural Changes: Section by Section Analysis

The following matrix describes the major changes SB 1087 makes to the SB 375 process compared to existing law. CALCOG staff has summarized existing law, the change, and provided a quick analysis. Then, based on the analysis, staff has made an assessment as to whether the change is “Positive” or “Neutral.” Significantly, we do not find any language that rises to the level of “Concerning” or would lead us to recommend withdrawing our support.

CHANGE	COMPARING EXISTING LAW TO PROPOSED CHANGE IN SB 1087
1. California Transportation Plan Assessment: Neutral	**Existing Law.** The CTP is a long-range plan. This provision requires the plan to review how the transportation plan will contribute to achieving the states climate goals. **The Change.** Requires that the CTP include actions, performance measures and priorities that demonstrate how the objectives of the plan will be achieved, and the achievement of GHG emission reductions, including a description of how performance measures informed corridor, modal, and capital project planning for all projects to be completed by 2035 and 2045. **Analysis.** ***Point in Favor*.** The amendments create greater accountability for state action. CALCOG has long noted that this lack of state progress accountability places excess pressure on the SCS process. Thus, adding performance standards to the CTP is a step toward creating a more balanced accountability framework. ***Point in Concern.*** The July 2026 draft of the CTP emphasizes the need to reduce VMT — more than any draft in the past. Members that have projects programmed on the state highway system may be concerned that performance metrics developed with this emphasis could make it more difficult to deliver critical projects. But the CTP is still a broad document that mentions the need for capacity and in VMT increasing projects like tolled and managed lanes. But its fair to recognize the risk and potential scope creep. CALCOG and its members will need to remain engaged and vigilant as these measures are developed and implemented.

CHANGE	COMPARING EXISTING LAW TO PROPOSED CHANGE IN SB 1087
2. The 2045 Target Year Assessment: Neutral to Positive (depending on how you look at it)	**Existing Law.** CARB sets GHG reduction targets for 2020 and 2035. No statutory lead-time requirement before a new target applies to an MPO's RTP/SCS. **The Change.** Changes target years to 2035 and 2045, aligning with the state carbon neutrality goal. New target only applies if set more than one year before the region's next SCS is due. **Analysis.** Extension of the targets was inevitable. The 2045 year is the least intrusive of the alternatives (e.g., some stakeholders sought perpetual extension). But this bill does two more things: it strikes the 2020 target year (eliminating the risk of post year check backs) and creates greater process certainty by limiting when new targets become effective — protecting against a new target dropping within 12 months of an RTP update deadline. An understandable counterpoint is that the 2045 target extends the SCS requirement by 10 years. But it's hard envisioning that the state would allow SB 375 target setting to expire as it continues to enforce climate policy in other sectors. In that light, a 10-year extension is the least intrusive option. Better to do it in this context than allow another bill to be introduced that could extend the requirement farther (e.g., a rolling 20-year target period).
3. Target Setting Process Assessment: Positive (though many of our members favored reconstituting the RTAC, which was in the previous version of the bill, the new amendment remains an improvement over current law)	**Existing Law.** CARB appointed the Regional Targets Advisory Committee (RTAC) for the original 2009 target-setting round. The body has been dormant since then. CARB staff engaged in an information gathering process to re-set targets that was not defined in law. **The Change.** CARB must conduct two technical workshops before December 1, 2028 and invite MPOs, affected air districts, Caltrans, CTC, HCD, local governments and other practitioners and technical experts. **Analysis.** Creates a formal process for MPOs and technical experts to engage in target-setting. Addresses tensions between GHG reduction and other state objectives, which reflects concerns CALCOG has repeatedly raised about the single-focus nature of the current process.

CHANGE	COMPARING EXISTING LAW TO PROPOSED CHANGE IN SB 1087
4. Target-setting process and transparency Assessment: Very Positive	**Current Law.** CARB exchanges technical information with MPOs and air districts before updating targets. No requirement to consult with CTC or HCD. No statutory requirement to publish methodology and assumptions in advance. Targets are adopted via standard process. **The Change.** Before updating targets, CARB must exchange technical information with CTC, HCD, Caltrans, MPOs, local governments, and air districts; release draft targets for public comment; publish its methodology and assumptions, 60 days before releasing draft targets; hold 3 public workshops; and adopt final targets at a public board meeting. CARB must also consider factors that ground the targets in reality, including geography and resource constraints. In addition, CARB must consider how state laws related to fair housing, affordability, resilience, transportation, economic vibrancy, and land conservation should be balanced in setting GHG reduction targets. **Analysis.** Increases transparency by publishing the assumptions that drive the target. Provides a framework for MPOs to demonstrate what can and cannot be achieved with realistic financial constraints. Particularly significant is the requirement to review competing state policies — CALCOG has argued that state agencies need to account for when various state objectives conflict. CTC and HCD consultations bring transportation programming and housing planning perspectives into a process historically dominated only by climate policy expertise.
5. GHG Model Consistency Assessment: Positive	**Current Law.** CARB considers its own modeling in setting targets but is not explicitly required to limit its GHG methodology to its current adopted model. **The Change.** Requires that MPO technical methodologies for estimating SCS emissions be consistent with CARB's most current adopted model for assessing on-road vehicle emissions. **Analysis.** Although this sounds like a limitation on MPOs, requiring alignment with the CARB's model assures that CARB cannot veer from that standard. In the past, CARB has used different GHG assumptions for SB 375 targets that were more aggressive than its own modeling supported (or at least we think so, since they did not always have to provide the details on how their figures were calculated). Tying both the MPO methodology and CARB's review to CARB's current adopted air quality model creates a shared analytical baseline.

CHANGE	COMPARING EXISTING LAW TO PROPOSED CHANGE IN SB 1087
6. 8 Year SCS Cycle Assessment: Positive	**Current Law.** MPOs prepare an SCS as part of every four year update of its Regional Transportation Plan (RTP). California law requires CEQA review of each RTP. **The Change.** Requires MPOs to prepare the SCS every eight years, beginning with either of the next two regularly scheduled updates after January 1, 2028. In the intervening four-year cycle, MPOs prepare and adopt the RTP as required by federal law but submit an SCS implementation report rather than a new SCS. As part of this implementation report process (see item #12 and section B below), it must reaffirm its SCS. **Analysis.** The reduced frequency of full SCS preparation allows focus on implementation, not perpetual planning, which is resource intensive. MPOs avoid the additional work of new land use forecasting, modeling, additional public outreach, and CARB review. The implementation report is substantially less work than building a full SCS analysis.
7. SB 1 Funds — APS Eligibility Assessment: Positive	**Current Law.** An APS must be prepared as a separate document from the SCS if a region cannot achieve its GHG target. Eligibility for TCEP and SCCP — two major SB 1 competitive programs — requires an adopted RTP with a CARB-approved SCS. A region that must prepare a separate APS does not have an approved SCS and is therefore ineligible for those programs. **The Change.** The APS is no longer required to be a separate document. In addition, the need to adopt an APS no longer prohibits eligibility for SB 1 discretionary programs like Solutions for Congested Corridors Program (SCCP), and Trade Corridor Enhancement Program (TCEP). **Analysis.** Although the APS is no longer a barrier to eligibility, funding will be limited to projects that help reduce GHG emissions — a threshold that should be comparatively easy for TIRCP and SCCP, but more difficult for TCEP.
8. Virtual Workshops Authorized Assessment: Very Positive	**Current Law.** MPOs have to hold a number of workshops in the development of their SCS. No provisions are made for virtual meetings. **The Change.** The required meetings as part of the development of the SCS may be done with virtual options. **Analysis.** This is not only a positive and cost-saving option for the SCS, but may prove to be a model for other local processes that have similar needs across broad areas to gain public input.

CHANGE	COMPARING EXISTING LAW TO PROPOSED CHANGE IN SB 1087
9. CARB Review of Technical Methodology Assessment: Very Positive	**Current Law.** MPOs submit a description of their intended GHG methodology before. CARB responds but no deadline applies and the scope of review is not limited. **The Change.** CARB must complete its review within 60 days, which is limited to whether the MPO methodology aligns with the SCS guidelines. **Analysis.** These are meaningful improvements that CALCOG sought in a comment letter in 2024 for a process that MPOs have found unpredictable and open-ended.
10. CARB Review of the SCS Assessment: Very Positive	**Current Law.** CARB reviews the submitted SCS and must determine (only) whether the strategy would, or would not, achieve the region's GHG targets if implemented. CARB has 60 days to complete its review. No requirement to put its reasoning in writing and no consequence when CARB (frequently) misses its deadline. **The Change.** CARB must make one of four decisions: (I) determine it achieves the target; (II) approve with minor corrections; (III) not approved, with written findings; (IV) indeterminate, if the MPO previously failed to address CARB deficiency findings. CARB has 60 days to review. If it finds deficiencies, it must detail the findings in writing and the MPO gets 60 days to respond. CARB then has a further 60 days to review and issue one of the four decisions above. Significantly, if CARB misses any of these deadlines, the SCS is deemed approved for implementation and funding purposes. **Analysis.** The deemed-approved provision is a meaningful new protection. Requiring CARB to disclose specific, material deficiencies (rather than issue a general rejection) addresses a longstanding frustration and gives MPOs a clearer basis for responding. An indeterminate finding occurs only after an initial deficiency finding and underscores the importance of MPOs engaging with CARB. Also, in another provision, CARB must provide a list of what it needs to make a determination, which should provide MPOs greater certainty in the process.

CHANGE	COMPARING EXISTING LAW TO PROPOSED CHANGE IN SB 1087
11. SCS Guidelines Development Assessment: Positive	**Current Law.** Largely silent on issue. CARB staff develop SCS guidelines with no Board approval. MPO staff have reported that final Guidelines feel CARB staff driven. **The Change.** CARB must consult with MPOs, CTC, the SGC, and stakeholders (builders, housing, equity, environmentalists, labor, transportation agencies, and local governments). Significantly: the Guidelines must include a checklist of review requirements and acceptable methodologies. Guidelines must be adopted with public workshops and a public hearing. While this is short of the APA process argued for by builders, its substantially more transparent than the current process, which has been handled at the staff level. **Analysis.** These requirements significantly constrain CARB staff's ability to update guidelines unilaterally. The consultation requirement gives MPOs a formal seat in shaping the analytical ground rules. The checklist will help standardize the process — some MPO staff have noted that the current review process has been applied in an ad hoc manner at times. And amendments made must be taken by the CARB board, making it less staff driven.
12. SCS Implementation Progress Report Assessment: Positive	**Current Law.** Only SANDAG and SACOG provide implementation reports, which were required by special legislation where each sought to change their submission date. **The Change.** Requires all MPOs to prepare an implementation progress report four years after adopting an SCS. Statutory scope is defined and does not require new modeling or primary data collection. MPOs under 1.5 million may include a certification that they are unable to comply with a specific requirements or elements due to resource constraints. Also, the special reporting provisions for SANDAG and SACOG relating to special circumstances are deleted. **Analysis.** Although this is a new obligation, it’s given in exchange for the 8-year SCS. The statutory scope limitations and smaller-MPO certification assure that the report is a simple reporting device and not another expensive planning exercise. (More information can be found in section B).

CHANGE	COMPARING EXISTING LAW TO PROPOSED CHANGE IN SB 1087
13. Amending SCS due to Material Change Assessment: Neutral We conclude "neutral" here because this provision helps enable the 8-year SCS and the worst-case (and we think unlikely) outcome is the current status quo. But we would prefer to delete the material change language altogether.	**Current Law.** Current law requires an RTP every four years. **The Change.** Due to the new 8-year planning period (see Row 6 above), MPOs must make an assessment if there is a material change to their SCS when they complete the federally required RTP 4 years into the SCS period. If the MPO determines that there is a material change, they must submit an amended SCS to ARB for approval consistent with the SCS approval process. **Assessment.** This provision would benefit from more clarity. But the risk of a experiencing substantial material change in such a long-range planning document after just four years is low. Over the history of SB 375 implementation, there have been times where MPOs retained most of the base line assumptions from one RTP to the next without experiencing a situation where that require a material change determination. Also its significant that the MPO is making the determination, which limits the risk of an arbitrary determination. But in the end, the worst case outcome is that few. Its worth considering what the worst-case outcome is if an MPO has to make such a determination. In such cases they have to make an amendment so their SCS to address the change, which is presumably something substantially less that producing an entirely updated SCS every four years.
14. SB 150 Progress Report Assessment: Positive	**Current Law.** CARB prepares a progress report every four years assessing each MPO's progress toward GHG targets in consultation with MPOs and stakeholders. **The Change.** Adds CTC and HCD in addition to MPOs and affected stakeholders. **Analysis.** Brings transportation programming and housing planning perspectives into CARB's periodic assessment of SCS performance — consistent with the broader goal of treating GHG reduction as a multi-agency responsibility rather than one that falls primarily on MPOs.
15. Regional Housing Needs Assessment Integration Assessment: Neutral	**Current Law:** Requires SCS to "identify areas within the region sufficient to house all the population of the region..." **The Change:** Requires that the SCS also take into account the existing and projected housing needs and demographic and household growth assumptions used by HCD in the most recent RHNA, to the extent applicable and if it is consistent with the requirement to use reasonable planning assumptions (as required by the federal air conformity process). **Analysis:** Stronger alignment between RHNA and SCS has been a priority of housing advocates and is good practice. This is a good way to address the issue in a way that assures compliance with federal law. Our position has been that current RTPs already comply with this element. This language adds a degree of clarity but it should not require significant changes to current practices.

B. Implementation Report Requirements

SB 1087 now requires MPOs to prepare an SCS implementation progress report four years after adopting an SCS. Previously, SANDAG & SACOG-specific legislation applied to those agencies.

What is Required in the Report.

- A progress summary toward the GHG target, with indicators showing the direction of trends;
- A description of progress on each major GHG-reducing policy, program, or project identified;
- A list of capacity-increasing projects on the state highway system delivered earlier than assumed in the SCS, noting whether those projects are in disadvantaged communities;
- A list of transportation projects added to, removed from, or amended in the RTP since the last SCS adoption, with the same disadvantaged community notation;
- An assessment of legal, policy, or funding barriers to further progress, which may include factors outside the MPO's control.

What the Statute Does Not Require. MPOs are not required to conduct new travel demand modeling, land use or scenario modeling, geospatial analysis, or primary data collection. MPOs may rely on data already available from federal, state, regional, or local agencies. Where current data is not reasonably available, the most recent available data is sufficient.

Protections for Smaller MPOs. MPOs with fewer than 1.5 million in population must still comply with the report's requirements to the extent feasible using reasonably available information. Where a specific requirement or element can't be fully addressed because of a material staffing, fiscal, technical, or data limitation, the governing board may adopt a certification identifying the specific requirements, describing the limitations, and explaining the reasonable efforts made to address them. The certification applies only to the identified requirement or requirements.

What It Looks Like in Practice. The SANDAG report prepared under an earlier region-specific requirement offers a reference point. It tracks near-term actions and includes a successes and barriers narrative organized around commitments the SCS. The SB 1087 report is more narrowly scoped than the SANDAG example and is limited to the specific content categories listed above. Below is a link to a SANDAG's most recent 11 page Implementation Report.

https://www.sandag.org/-/media/SANDAG/Documents/PDF/regional-plan/2021-regional-plan/implementation/ab-1730-scs-implementation-tracking-report-2024-01-05.pdf

Little Risk of Litigation. The statute states that the report is not intended to affect the land use authority of local governments. On its face, the statute does not create a cause of action tied to failure to show GHG progress — the report describes trends rather than certifying compliance.

That said, the requirement to list capacity-increasing highway projects and note their relationship to disadvantaged communities is new and specific.

One New Wrinkle. A new provision requires that,the MPO reaffirm its SCS. If the MPO determines that the SCS is projected to materially fall short of the target, it must amend the SCS to address it and submit the amended SCS to CARB for review.

C. APS Eligibility for SB 1 Programs

PROGRAM	EXISTING LAW	WHAT SB 1087 DOES	MPO IMPLICATIONS
Public Transportation Account	Caltrans may use PTA funds for planning generally. No requirement that activities in MPO regions be consistent with SCS.	Limits PTA-funded Caltrans planning activities within an MPO region to activities consistent with the SCS or APS, only to address an impediment identified in the APS to achieving GHG targets.	Aligns state planning expenditures with regional plans. A modest but directionally important change.
Local Planning Grants	Grants encourage planning that furthers state goals and best practices cited in RTP guidelines.	Adds the goals of the RTP/SCS as an explicit consideration for local planning grant awards.	Reinforces the connection between planning grants and SCS implementation.
Trade Corridor Enhancement Program (TCEP)	Projects in MPO areas must be in a RTP with a CARB-approved SCS to be eligible. MPOs with only an APS are not eligible.	Allows projects from MPO areas with a CARB-accepted SCS that includes an APS to be eligible, provided each nominated project reduces GHG emissions.	Preserves funding eligibility for regions whose SCS includes an APS component.
Solutions for Congested Corridors Program (SCCP)	Project nominations must be part of a comprehensive multimodal corridor plan developed specifically for SCCP. Projects must be in an adopted RTP with a CARB-approved SCS.	Moderates the corridor plan. Projects must support RTP. Extends APS eligibility on the same terms as TCEP. Beginning with the 2032 program, CTC must prioritize near-term projects.	Reduces one layer of process for SCCP nominations. The RTP/SCS development can perform or incorporate the corridor plans.

D. General Comments and Observations

1. The Eight-Year SCS Period is an Important Advantage. Moving the full SCS from a four-year to an eight-year cycle cuts the number of land use forecasts, scenario models, public outreach programs, and CARB review cycles an MPO must run in half. For most of our members that is the largest recurring planning cost in the agency, and the savings are staff time and consultant dollars that can be redirected to implementation — the work that actually delivers the strategy. The midpoint implementation report is a real but modest obligation in exchange, and it is scoped by statute so that it cannot grow into another planning exercise.

2. Grounded Targets. The requirement that targets account for financial constraints, existing conditions, existing resources, exogenous factors, and the combined effect of all levels of government addresses the core structural problem with SB 375 target-setting that CALCOG has been raising for 15 years. If this language is implemented faithfully, it changes the nature of the conversation between CARB and MPOs from a compliance exercise to a better planning partnership. How CARB interprets it in practice will matter, and CALCOG will be active in that process.

3. APS Eligibility for SB 1 Programs has been a Long-Sought CALCOG Policy. No MPO has had to prepare an APS to date, but the changing planning environment — including post-pandemic travel patterns, the pace of electrification, and flattening population projections — has made that prospect more realistic for some regions. The ability to adopt an approved SCS that includes an APS component, and to retain eligibility for TCEP and SCCP in that circumstance, removes a structural disincentive that has complicated planning decisions in vulnerable regions.

4. The Shot Clock Provisions are Meaningful. The 60-day methodology review, 60-day SCS determination sequence when deficiencies are found), and deemed-approved consequence for CARB missing its deadlines are real, hard-won procedural protections. MPOs finally have an enforceable clock instead of an open-ended wait. CALCOG should track early implementation carefully and be prepared to return to the Legislature if CARB finds ways, such as leaning on the narrow methodology-objection exception, to effectively extend the timelines.

5. Where the Risks Are. The implementation report and SCS reaffirmation requirement is manageable but deserves attention. The statutory scope limitations and smaller-MPO certification are genuine protections, and the report is less burdensome than an SCS. But it arrives at the midpoint of the planning cycle, and the requirement to track capacity-increasing highway projects relative to disadvantaged communities is specific and new.