



TRANSMITTED ELECTRONICALLY

July 12, 2022

California Air Resources Board
Sustainable Transportation and Communities Division
Attn: Jennifer Gress, Division Chief
1001 I Street
Sacramento, CA 95814
sustainablecommunities@arb.ca.gov

RE: Draft 2022 Progress Report (SB 150 Report)

Dear Division Chief Gress,

Thank you for the opportunity to comment on the Draft 2022 Progress Report, required by Senate Bill (SB) 150. The Draft 2022 Progress Report represents significant outreach, analysis and dedication from the ARB staff, board, and partners. We appreciate the work of staff and the partnership demonstrated in the development of this report.

The California Association of Councils of Governments (CALCOG) is a non-profit organization formed to serve regional governments across the state. These include Metropolitan Planning Organizations (MPOs), Regional Transportation Planning Agencies (RTPAs), and County Transportation Commissions, all of which are responsible for transportation planning and delivery across the state.

The report demonstrates partnership and clarity. The Draft Progress Report is clear about the challenges, opportunities, and potential actions and that we all have a role to play. We appreciate that the report identifies a number of local, regional, and state actions that could help implement regional Sustainable Communities Strategies (SCS). This type of clarity in the report demonstrates the partnership that will be necessary to successfully implement the regional Sustainable Communities Strategies and achieve our SB 375 goals. Thank you.

The report focuses on implementation. We fully support the report's conclusion that SB 375 reform is not where we should be focused, and the priority should be identifying and supporting more tools for SCS implementation. We appreciate the report highlighting that MPOs do not have all the funding or authority need to implement their regional plans.



Continued partnership will be needed to prioritize which tools and proposed actions from the report will be most effective for supporting regional implementation of the SCSs.

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

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

- **Accurately estimating VMT at a regional level is critical but very complex.** MPOs are skilled at this and have data and models for estimating and analyzing VMT that have been honed over time with great attention to detail. Using different data and/or methods to estimate VMT in the draft report could cause confusion. We encourage staff to work closely with MPOs to correct, refine and/or contextualize the data in Appendix A.
- **Emphasize the importance of safety.** Although there is a section that discusses the importance of a safe transportation system for all travelers and all types of travel modes, there is a lack of recognition in some of the potential actions. Potential actions related to prioritizing goals such as VMT reduction in planning, projects, and funding should also acknowledge the need to continue prioritizing safety projects.
- **Acknowledge competing state objectives and goals.** The recent AB 285 Report by the Strategic Growth Council notes that there are many state plans and programs, sometimes with competing goals. The example above of potential prioritizing VMT reduction over safety is one such example. Another might be reconciling the need for more growth in low VMT areas with equity goals such as Affirmatively Furthering Fair Housing. More work is needed to align all state goals and programs. We are not seeking resolution of this issue in the Draft Progress Report, but rather just an acknowledgement of it.
- **Understand that the color of money matters.** The Draft Progress Report, similar to the AB 285 Report, suggests that MPOs should spend more money on clean travel solutions. But the report does not acknowledge that MPOs are funding projects with many different funding sources, most of which have clear federal and/or state requirements about how the funds can be utilized.
- **Define the process for replacing the gas tax.** In addition to enabling equitable pricing strategies that will help reduce VMT, we need a clear solution, process, and timeline to replace the gas tax. We know the gas tax is steadily declining and we want a continued increase in electric vehicles, but without enough advanced

planning we will not have the funds needed to operate and maintain the transportation system for all users and modes. Developing a process for this should be a top priority.

- **Prioritize with regional partners.** The Draft Progress Report outlines a number of proposed actions to support SCS implementation and ultimately the achievement of state goals to reduce VMT and GHG. ARB's recent Draft 2022 Scoping Plan also includes a list of actions focused on this. The recent AB 285 Report also outlines potential actions focused here. We strongly recommend that the state work together to create a working group that is focused on prioritizing these actions and includes regional agencies as well as other key stakeholders.

Thank you again for your consideration of our comments. We are happy to provide more detail on any of this as needed. Our desire is to be good partners in the state's effort to combat climate change. We look forward to continued engagement with ARB and other state partners.

Sincerely,



Jennifer Tendick
CALCOG Director of Planning Policy