



July 14, 2022

Jennifer Gress
Division Chief, Sustainable Transportation and Communities Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Sent via email: sustainablecommunities@arb.ca.gov

Re: AMBAG Comments on the Draft 2022 SB 150 Progress Report

Dear Ms. Gress:

Thank you for the opportunity to comment on the Draft 2022 SB 150 Progress Report. AMBAG appreciates the additional time to review the Draft 2022 SB 150 Progress Report. AMBAG offers the following general and specific comments on the Draft 2022 SB 150 Progress Report and Appendices.

General Comments on the Draft SB 150 Progress Report

Allow Regional Flexibility to Address Safety, Goods Movement and Mobility Needs

State funding programs should provide flexibility to regions so that they can address all modes efficiently as possible to maximize safety, mobility, goods movement, and throughput in order to expedite the response to climate change. A flexible geographically sensitive approach in recognition that many parts of the state are more rural than the large urbanized areas needs to be acknowledged in the SB 150 Progress Report.

Acknowledge Competing State Objectives and Goals

The SB 150 Progress Report needs to acknowledge that there are competing state goals and objectives within the many state plans and programs, similar to what was included in the recent AB 285 Report by the Strategic Growth Council. Examples include prioritizing vehicle miles traveled (VMT) reduction over safety as well as reconciling the need for more housing growth but a state moratorium on new water meters.

Limitations of Transportation Funding Programs

The Draft SB 150 Progress Report suggests that MPOs should spend more money on alternative transportation modes to address climate change. However, the draft report does not acknowledge that MPOs are funding projects with many various funding sources, most of which have clear federal and/or state requirements about how the funds can be utilized. These funding limitations needs to be acknowledged.

Increased Collaboration with Regional Partners

The Draft SB 150 Progress Report outlines a number of proposed actions to support SCS implementation to help achieve the state goals to climate goals. CARB's recent Draft 2022 Scoping Plan also includes a list of actions as does SGC's AB 285 Report. AMBAG recommends that the state agencies work together with the MPOs and other regional agencies to prioritize these actions.

Specific Comments on the Draft SB 150 Progress Report Appendices

Appendix A

- Page 25 in AMBAG GHG/VMT
 - The VMT trend in this chart does not align with HPMS and AMBAG's model estimates. AMBAG requests that this VMT data is reviewed again.

- Page 30, Summary Section
 - How will this data be compared with MPO's modeled VMT data as they are estimated based on household population and its socio-economic characteristics and validated with household survey/ACS data? AMBAG recommends exploring such variables into the next SB 150 Progress Report.

- Page 31, Commute Mode Share
 - The ACS 1-year estimates are published annually for geographic areas with populations of 65,000 or more. The Census Bureau is also publishing annual ACS 3-year estimates for geographic areas with populations of 20,000 or more. ACS 1-year data may not paint a true picture considering AMBAG and many other rural area MPOs do not have urban areas with populations greater than 65,000.
 - Since mode share normally does not change much annually, AMBAG suggests using the ACS 5-year average data set for the rural areas.

- Page 44, Commute Travel Time by Mode
 - Transit travel time will be always higher as compared to drive alone and HOV commute trip. Transit (except light rail) uses same transportation network but transit stops at multiple locations and that increases travel time in relation to SOV/HOV.
 - Most MPOs are minimizing their investment in roadway capacity expansion projects as a result it is likely to increase congestion and that will result into longer commute time for all mode (SOV/HOV/Transit).

- Page 51, Vehicle Ownership in Priority Population Areas
 - AMBAG requests additional clarification of this statement... “This trend suggests that residents of priority population areas may be needing to drive more and that it will be important to add targeted strategies that support a variety of transportation modes in these areas.”
 - Is there any data analysis to support this statement? This could be a result of household size expansion or improvement in the economic status of the household instead?

- Page 52, Lane Miles Built
 - In contrast, congested driving (VMT) may result in higher GHG emissions. In many congested areas during peak periods, sometimes even 5 miles of trip takes an hour. Such congestion also impacts transit route as well.

- Page 53, Lane Miles Built
 - AMBAG requests that this statement be clarified “Roadway expansion projects may increase VMT and GHG emissions.”
 - In many rural areas, strategic roadway improvements not only improve safety but also can have negligible impacts on VMT. This issue is currently being studied by the Rural Counties Task Force.

Appendix B

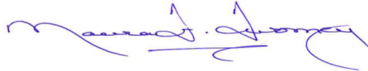
- Page 13, Total New Housing Units Chart
 - The total new housing units is incorrect. Please double check this number. According to AMBAG forecasts, the total new housing units should be 24,245.

- Page 21, Daily Transit Ridership Chart

- o This is not a daily transit ridership for the AMBAG region. It looks like an annual transit ridership number. Please revise.

Thank you for the opportunity to review the Draft SB 150 Progress Report. Please feel free to contact Heather Adamson, Director of Planning, at hadamson@ambag.org or (831) 264-5086 if you have any questions.

Sincerely,



Maura F. Twomey
Executive Director