



July 14, 2022

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA

RE: Recommendations to SB 150 Draft 2022 Progress Report

Dear Chair Randolph and Air Resources Board members and Staff,

Environmental Health Coalition (EHC) applauds the California Air Resources Board's (CARB) **commitment to reducing greenhouse gas emissions (GHG) from transportation and Vehicle Miles Traveled (VMT) and the publication of the California Sustainable Communities and Climate Protection Act Draft 2022 Progress Report** published on June 7, 2022.

EHC urges CARB to include the following recommendations in the report:

- 1. Increase CARB's enforcement and funding regulatory authority.**
- 2. Achieve a higher VMT target of 25% VMT reduction from 2019 levels by 2030.**
- 3. Prioritize Frequent & Inexpensive Transit in EJ¹ Communities with:**
 - › Double frequency on existing high demand services,
 - › New routes to expand transit service, and
 - › Free transit fares for EJ communities by 2030.
- 4. Prioritize affordable housing development near transit in EJ communities.**

The report accurately states the problem: **“Californian’s are driving more – leading to more pollution, higher costs, and worse day-to-day experiences...The core problem is that even well-made plans too often remain as plans, rather than becoming realities.”**² As a result, California is not on track to meet its GHG reduction goals.

¹ As defined by top 25% in CalEnviroScreen

² California Air Resources Board. 2022 Progress Report California's Sustainable Communities and Climate Protection Act. June 2022. P,4

Simultaneously, it highlights transit and affordable housing as priority solutions, both in strong alignment with EJ communities. Compare to the 2019 version, it demonstrates tremendous progress when acknowledging that **“zero emission vehicles alone are not enough to fix our transportation and housing systems – instead, we need to create a future that does not depend on cars. Just as we created cutting-edge technology to meet zero-emission standards, we need to create tools to implement walkable cities; frequent and inexpensive or free transit; complete streets; and attractive, abundant, and affordable housing options.”**³ EHC strongly supports potential actions outlined to optimize the transit experience, the acceleration delivery of VMT-reducing projects; improve access to funding for high mode shift projects and prioritize community needs. As well the acceleration of infill-housing production, and expansion of tools and resources to increase and protect affordable housing.

We believe, however, that the state is at a critical point and pleads for unrepresented action by CARB and the legislature. Transportation is the biggest source of GHG emissions, nonetheless, “billions in funding for VMT [and GHG emissions] increasing projects are still found within RTPs (e.g. new general-purpose lanes, new managed lanes, interchanges, and new arterials and connector roads).”⁴

EHC urges CARB to include the following recommendations in the report:

1. Increase CARB’s enforcement and funding regulatory authority

Although the report calls the legislature and every level of government to take bold action around implementation, which EHC fully supports. It dismisses the importance of strengthening Senate Bill 375 to give CARB more regulatory authority. EHC urges the legislature to provide CARB with the funding and regulatory tools to be able to enforce urgently needed GHG and VMT reductions. CARB must advance stronger regulatory and implementation measures proven to increase mass public transit, access to jobs and other opportunities, as well as affordable housing development particularly in EJ communities.

2. Achieve a higher VMT target of 25% VMT reduction from 2019 levels by 2030.

It is reported that MPOs across California are challenged by previously approved transportation projects and have committed billions in funding to new managed lanes, new general-purpose lanes, and connector roads, which will increase VMT. CARB must commit

³ California Air Resources Board. 2022 Progress Report California’s Sustainable Communities and Climate Protection Act. June 2022. P,10

⁴ California Air Resources Board. 2022 Progress Report California’s Sustainable Communities and Climate Protection Act. June 2022. P,47

to higher VMT reduction target and work closely with MPOs to advance impactful VMT reducing projects, while discouraging old projects in the pipeline that will dramatically increase VMT. Additionally, EHC recommends the alignment between the report's findings with the 2022 Scoping Plan to ensure funding and acceleration of projects that can rapidly reduce GHG emissions like transit, passenger rail, and affordable housing.

3. Prioritize Frequent & Inexpensive Transit in EJ⁵ Communities

EHC supports and expands the report's finding to prioritize EJ communities in the ask to the legislature to support "transit success by dedicating funding to transit projects that optimize the transit experience, improve connections between systems, and offer a convenient alternative to driving."⁶ Transit funding should:

- › Double frequency on existing high demand services in EJ communities.
- › Establish new routes to expand transit service in EJ communities.
- › Provide free transit fares for EJ communities by 2030.

In San Diego, the public transit system fails to meet the needs of the region. Residents in EJ communities are San Diego Metropolitan Transit System's (MTS) number one customers, but the system does not serve them the way it should. Sixty-six percent of the riders are low-income.⁷ However, transit remains extremely expensive; the average family in San Diego spends \$10,552 on transportation a year⁸, and seventy percent of jobs cannot be reached within ninety minutes using transit in the MTS service area.⁹ As a result, EJ communities cannot rely on transit to meet their basic needs, miss job opportunities, endure transportation-related air quality impacts, and spend a large percentage of their income on an unreliable transit system.

However, when done right, transit works. It is fiscally feasible and has positive impacts in the economy. The following are good examples from San Diego. Prior to the COVID-19 Pandemic, the region was experiencing a steady ridership climb. In February 2020, the Metropolitan Transit Agency (MTS) reported a 1.2 million bus

⁵ As defined by top 25% in CalEnviroScreen

⁶ California Air Resources Board. 2022 Progress Report California's Sustainable Communities and Climate Protection Act. June 2022. P,46

⁷ SANDAG Draft Title VI Fare Equity Analysis for Fare Change Proposed for 2019, 7, 2019. https://www.sandag.org/uploads/meetingid/meetingid_4959_25000.pdf

⁸ Consumer Expenditures For The San Diego Area: 2015-16: Western Information Office: U.S. Bureau Of Labor Statistics". Bls.Gov, 2018, https://www.bls.gov/regions/west/news-release/consumerexpenditures_sandiego.htm ; <https://www.bls.gov/cex/2016/msas/west.pdf>

⁹ American Community Survey, Table B08141, 2016 5-year data.

and trolley trips increase over the previous 6 months as a result of: frequency increases, Free Ride Day, discounted fares (for youth, seniors, and people with disabilities or medicare), opening of a new South Bay Rapid, and increase of other Bus Rapid services.¹⁰ Most recently, preliminary ridership data for the first month (May 2022) of the San Diego Youth Opportunity Pass (free transit for youth 18 and under in San Diego County) pilot program shows a:

- ✓ **38 percent increase in number of rides taken by youth countywide**
- ✓ **77 percent increase in number of unique youth riders using the system, and**
- ✓ **65 percent increase in average Sunday ridership countywide.**

Investments in transit have a positive effect in the economy. A 2018 economic impact report by MTS found that

“Every dollar of direct MTS spending yielded a total of about \$2.82 in gross regional product. Including all of the ripple or multiplier effects, San Diego MTS-related activities generated an estimated \$1.0 billion of gross regional product (GRP) in FY 2018. MTS was directly or indirectly responsible for nearly 13,000 of the total number of jobs and approximately \$625 million in total personal income.”¹¹

4. Prioritize affordable housing development near transit in EJ communities.

Corporate landlords and weak housing policies are displacing residents in EJ communities from the neighborhoods they worked hard to transform into healthy communities. Barrio Logan, Sherman Heights, City Heights, and Old Town National City are the same neighborhoods hit first and worst by climate change as well as some of the San Diego communities where residents are deciding between paying rent and food by spending more than 1/3 of their income on rent. The report states that “despite an increase in planning for homes at all income levels, efforts to build homes are not meeting the need, particularly for homes for lower-income households.”¹² EHC recommends a prioritization of tax increment benefits to transit corridors within the top 25% CAEnviroScreen identified areas. Compact housing types such as multi-family and accessory dwelling units (ADUs) are also promising solutions within EJ communities and it is encouraging to see support for their growth in the report.

¹⁰ <https://www.sdmts.com/inside-mts/media-center/news-releases/momentum-increasing-transit-ridership-san-diego-continues#:~:text=Every%20weekday%20300%2C000%20passenger%20trips,more%20than%2085.3%20million%20riders.>

¹¹ <https://www.sdmts.com/business-center/reports-records-and-policies/economic-impact-report>

¹² California Air Resources Board. 2022 Progress Report California’s Sustainable Communities and Climate Protection Act. June 2022. P,7

Thank you for the opportunity to provide comments on the SB 150 Progress Report. We look forward to continuing working with the board. Feel free to contact me with questions at carolinam@environmentalhealth.org

Sincerely,



A handwritten signature in blue ink, appearing to read 'Carolina', is positioned above a horizontal blue line. The signature is centered within a light gray rectangular box.

Carolina Martinez
Climate Justice Campaign Director
Environmental Health Coalition