



SAN JOAQUIN COUNCIL OF GOVERNMENTS

555 E. Weber Avenue • Stockton, California 95202 • P 209.235.0600 • F 209.235.0438 • www.sjcog.org

February 9, 2024

California Air Resources Board
1001 I Street,
Sacramento, CA 95814

Re: California's Draft Priority Climate Action Plan (PCAP) Public Comment

To Whom It May Concern,

Thank you for the opportunity to provide comments on the draft Priority Climate Action Plan (PCAP). As the Metropolitan Planning Organization (MPO) for San Joaquin County and managing an area designated as Nonattainment for ambient air quality standards, it is critical to pursue funding opportunities to sustain transformative programs that have a proven track record of reducing GHG reductions. SJCOG's vanpool program is such a program, but the ability to sustain the program is at risk due to funding limitations.

After attending the presentation and reviewing the draft PCAP, we noticed the omission of a GHG Reduction Measure to "**support transportation management incentive programs to reduce emissions, vehicle trips, expand transit use and vanpool programs**". Yet we were encouraged by the presentation from our neighboring agency, Fresno COG, who shared their extensive outreach efforts that resulted in the inclusion of a vanpool/carpool incentive in their PCAP. Based on SJCOG's program history and hearing Fresno COG's analysis, we would recommend that CARB consider adding a CHG reduction measure to fund vanpool/carpool, transit incentive program to reduce pollutants and improve public health.

As background, the vanpool program in the Northern San Joaquin Valley Region has proven to be an effective way to reduce the number of single occupancy vehicles in one of the most congested areas in the state. From San Joaquin County program alone, there is nearly 60% of the workforce commuting outside the county and currently over 450 vanpools commuting to and from the Bay Area, Sacramento, Stanislaus County, and Merced County. In the last five years, the vanpool program has grown by 260%. This is the highest increase over the span of five years in the program's history. The impact of this growth has resulted in the reduction of an estimated 145 million vehicle miles travelled (VMT) over the same period.

As the Central Valley continues to see population growth (Over 1 million estimated by [2060](#)), the number of commuters and vehicle miles traveled increases along with it. SJCOG estimates that by 2035 the vanpool program could reduce 965,821 VMT's per day and reduce 433.89 tons of CO2 per day. The ability to attract vanpool participation has much to do with the incentives offered as transportation costs continue to rise and the agency's ability to achieve these milestones is contingent upon securing enough funding to sustain the program.

Incorporating the proposed additional measure in the Final PCAP will provide an opportunity for our agency to compete in the Climate Pollution Reduction Grants program (CPRG) to support the continued efforts of the vanpool/carpool programs and support. The program would also target environmental justice communities and reduce transportation barriers in low-income and disadvantaged communities.

We would be happy to discuss this recommendation further with your team if needed. Please feel free to reach out to me if there are any additional questions or concerns. We look forward to your response.

Sincerely,

Kim Anderson
Deputy Director of Planning

David Bellinger
CHAIR

Diane Lazard
VICE CHAIR

Diane Nguyen
EXECUTIVE DIRECTOR

Member Agencies
CITIES OF
ESCALON,
LATHROP,
LODI,
MANTECA,
RIPON,
STOCKTON,
TRACY,
AND
THE COUNTY OF SAN
JOAQUIN