



October 15, 2024

Dr. Steve Cliff
Chief Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Pause Current SB 375 Targets and SCS Guidelines to Allow a Holistic Review of SB 375 Framework

Dear Dr. Cliff:

The eight metropolitan planning organizations (MPOs) of the San Joaquin Valley request a partnership with the California Air Resources Board (CARB), California Transportation Commission (CTC), Caltrans, and the Department of Housing and Community Development (HCD) to holistically review the SB 375 framework to improve how state and regional agencies collaborate to deliver multiple housing, climate, and transportation goals. The San Joaquin Valley MPOs serve a region with eight counties and 63 cities, whose collective population numbers more than 4.3 million residents. Those counties -- Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare -- are home to some of the most disadvantaged communities in the state and share an air basin challenged by weather and topography that creates an ideal setting for extreme air pollution. Our MPOs are sensitive to the need for greenhouse gas reductions and are committed to SB 375's intent.

SB 375 Provides A Foundation from Which the State Can Move Forward

SB 375 has improved regional transportation planning by emphasizing more significant investments in multimodal transportation and better coordination with housing developments. With each new iteration of the Sustainable Communities Strategy (SCS), we have seen better integration of land use, housing, and transportation policies, supporting better climate and quality of life outcomes for our residents. Notably, the public has become more involved in developing these plans, making projects more responsive to our communities' needs. This progress should be a foundation for further state and regional planning improvements.

But The Time Is Right to Revisit the SB 375 Planning Framework Holistically

Much has changed since SB 375's adoption in 2008. The State has accelerated transportation electrification through Advancing Clean Cars II, so that almost one in four new cars sold is zero emission. Under SB 743, vehicle miles traveled have replaced level-of-service as a critical success metric for transportation projects large and small. The state has also adopted substantial legislative changes to address the state's housing crisis. In addition, the global pandemic fundamentally altered travel patterns and land use preferences -- creating headwinds unforeseen when the law was designed or when the CARB Board last set targets.

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Thanks to state programs to support affordable housing and sustainable communities, active transportation, and transit improvements, as well as the Regional Early Action Planning (REAP) programs, partial funding is available to support critical housing and transportation needs needed to achieve our ambitious goals. However, as the SB 150 report acknowledged, funding and staffing for implementation remain far short of what is required to implement these regional strategies to the maximum extent. A restructured planning process can shift the focus toward implementation, thereby delivering faster and more effective results.

Work Collectively Towards Pragmatic Solutions

The San Joaquin Valley resides in a non-attainment air district. Our constituents suffer from poor air quality that is predominantly caused by our geographic bowl-shaped valley, walled off by mountains, weather patterns (winds blowing West to East), vast agricultural farmland, heavy goods movement traffic, and the jobs-housing imbalance, leading hundreds of thousands of daily commuters into the Bay Area and Los Angeles basin.

Density is an issue in the Valley regarding transit use and support. The Bay Area has a population of 6.8 million over 7,300 square miles, and Los Angeles County has 10 million people living over 4,700 square miles. In contrast, the Valley has 4.3 million people spread over 27,000 square miles. The Bay Area has nearly 60 percent more people living in an area a quarter the size of the Valley. Los Angeles has more than 2.5 times the population, over 1/6 of the area. Valley MPOs bear the burden of addressing heavy traffic that is not locally generated. Given our density profile, the one-size-fits-all application of VMT metrics exacerbates our ability to meet goals. Proportionality must be applied to assess VMT reduction, which was never intended for rural and suburban jurisdictions. Otherwise, by default, not meeting metrics designed for urban areas will send all the money to other parts of the state that do not have similar air quality concerns. Through the enactment of SB 768 (chaptered 9/27/24), we hope that the Department of Housing and Community Development's study of VMT will assist with SB 375 compliance. As a result, realistic expectations of what targets can be met and assessments of what types of pragmatic investments would yield the most favorable results per region must be made. The Valley has been innovative by introducing a VMT banking system concept to help offset emissions.

Furthermore, exogenous factors such as revised population growth estimates will substantially impact any plan's ability to deliver GHG reductions per capita. At the outset of SB 375, population growth within the San Joaquin Valley was expected to be greater than 1.1 million residents between 2020 and 2035 (i.e., a 24.5% increase). According to the latest estimates from the California Department of Finance, Valley growth over this period is expected to be less than 300,000 new residents (i.e., a 6.6% increase). This will hamstring the Valley as it strives to make GHG reductions per capita – new tools and measurements are needed to make progress.

All eight MPOs in the San Joaquin Valley strongly support California's climate goals and are deeply committed to improving passenger and freight rail systems, reducing GHG and vehicle miles traveled (VMT) where feasible, and improving public transportation, walking, biking, and other modes of transportation. Our region also supports transportation investments that are aligned with housing and economic development. While we strongly support addressing climate change, success will require creative, flexible, and pragmatic solutions for each region's unique opportunities and challenges.

The San Joaquin Valley has six counties with local sales tax measures dedicated to transportation. Still, it has been challenging to renew measures in Fresno and Madera to retain our ability to partner in advancing climate and mobility goals. Concurrently, gas tax revenue has been eroding, further inhibiting our ability to invest in multimodal



investments, transit-oriented development, and maintaining the basic infrastructure needed to support safety and mobility on local streets and roads and the state highway system. The San Joaquin Valley MPOs agree philosophically, we should not depend on petroleum production to help fund our infrastructure needs. We must focus on an equitable gas tax successor source, especially for our disadvantaged communities, that will provide predictability, stability, and an opportunity to balance funding to maintain investments to address safety, mobility, and air quality. The Cap-and-Trade program also needs to be extended to allow for continued investments into the Low Carbon Transit Operations Program (LCTOP) and Transit Capital and Intercity Rail Program (TIRCP) to complete passenger rail systems and augment first and last-mile bus service to make mode-shift more compelling.

Transit is expensive to build and operate and is not always a practical or efficient solution for a constituency's daily mobility needs. This is because transit typically lacks flexibility (traditional service is fixed-route service without options for route deviation and schedules), it can be unreliable, have long headways, and is sometimes limited or non-existent in more remote unincorporated areas. Greater resources are also needed to support micro-transit services, especially where traditional fixed route is not feasible and to support systems that offer transit services to our National Parks, such as the Yosemite Area Regional Transit System (YARTS).

Request to Conduct a Holistic Review of the SB 375 Framework

We request that CARB, CTC, Caltrans, and HCD work with MPOs to evaluate the SB 375 framework comprehensively. This effort will require us to engage in a deep and practical dialogue about the best way to achieve the suite of state and regional housing, climate, and transportation-related objectives, including GHG emission reductions. As part of this request, we ask that CARB pause the current SCS guidelines and SB 375 targets to allow for a robust and collaborative conversation about the best path forward in the coming months. However, should CARB be unable to pause SB 375 target setting due to statutory requirements, the Valley encourages CARB to re-establish existing targets for the Valley as a placeholder and identify new targets following the requested collaborative dialogue to reshape our collective SB 375 approach.

To demonstrate our commitment to this concept, this letter represents the collective submission of comments by the San Joaquin Valley MPOs for both the proposed amendments to the SCS guidelines (comments requested by CARB by Aug. 30) and the request for information related to the target setting (preliminary data questionnaire requested by CARB by Oct. 30). The time is right to develop more robust implementation solutions that fit state, regional, and local objectives.

We appreciate your consideration.

Sincerely,

Robert Phipps, Chair

San Joaquin Valley Regional Transportation Planning Agencies Directors' Committee
Interim Executive Director, Fresno Council of Governments



CC:

- Tomiquia Moss, Secretary, California Business, Housing and Consumer Services
- Toks Omishakin, Secretary, California State Transportation Agency
- Sam Assefa, Director, Office of Planning and Research
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- Tanisha Taylor, Executive Director, California Transportation Commission
- Gustavo Velazquez, Director, California Department of Housing & Community Development