



August 17, 2023

Dr. Steven Cliff, Executive Officer
California Air Resource Board
1001 I Street
Sacramento, CA 95814

Re: Progress Report on Sustainable Communities Strategies

Dear Dr. Cliff:

The American Lung Association appreciates the care taken by the California Air Resources Board (CARB) to produce the 2022 Progress Report on California's Sustainable Communities and Climate Protection Act implementation (per SB 150, Allen, 2017).

Informed by stakeholder input, observed trend data and strong technical analysis, the final SB 150 report provides a clear and sobering narrative as to the ongoing challenges to achieving healthier, more sustainable communities in California. Importantly, the report offers detailed policy recommendations to deliver on the promise of the Sustainable Communities and Climate Protection Act (Senate Bill 375, Steinberg, 2008) that remains elusive despite best efforts made. If acted upon by local, regional and state policymakers in a coordinated manner respecting authorities, resource gaps and needed tools, the recommendations can help to reduce the lingering barriers to aligning land use and transportation decisions to create healthier, more sustainable communities for all Californians.

We are concerned that the substantial finding that California remains off course to meeting climate standards related to transportation and land use is not the subject to greater public discussion to daylight the important finding, ensure accountabilities are assigned for corrective actions and seize opportunities to build healthier communities.

We recommend including the SB 150 report at the November 2023 joint meeting of CARB, the California Transportation Commission and Housing and Community Development.

This hearing presents an excellent opportunity to discuss the findings in the context of the Newsom Administration's all-of-government approach to our climate crisis. A discussion of the SB 150 report could serve to complement the annual progress report on the Climate Action Plan for Transportation Infrastructure (CAPTI, developed per Governor Newsom's Executive Order N-19-19), and can underscore the importance of alignment of funding guidelines and sources with achievement of California's climate strategy.

We applaud the progress made in the early stages of implementing the CAPTI framework, but the urgency of reducing vehicle miles traveled (VMT) and greenhouse gas emissions (GHG) outlined in state's Climate Change Scoping Plan and the latest SB 150 report underscores the need for more immediate and review and alignment of transportation funds with meeting California's climate standards. For example, key passages of the SB 150 report relevant to CAPTI implementation emphasize the need for coordination among government to ensure existing and new funding and projects support healthier and more equitable communities:

“The State, in partnership with regional and local agencies, needs to revisit and reprioritize investments away from transportation projects and development decisions that will increase driving. The State also needs to secure additional resources to provide support, guidance, targeted funding, and policy tools to make it easier and less costly to implement this reprioritization...”¹

Overall results presented in the SB 150 report indicate an ongoing lack of success in implementation of SB 375, with both VMT and related GHG emissions increasing. These points are well illustrated by the robust data dashboard accompanying the report. Highlighting and addressing these ongoing *increases* in VMT and GHGs is crucial given California must *decrease* VMT by 25 percent by 2030 and 30 percent by 2045 in order to fulfill California’s climate standards.² Though increases in VMT and GHGs slowed through 2019, “California is not on track to meet its associated climate goals under SB 375”,³ and since the 2018 report was published and discussed at the joint hearing, “[m]any trends moved in the wrong direction, away from advancing climate goals and showing worsening inequality.”⁴

“The daily passenger vehicle VMT increased by 15 percent from 2005 to 2019, from 847 million miles to 977 million miles. In addition, the daily SB 375 GHG emissions from passenger vehicles also increased in the same period by 8 percent. However, VMT and GHG increase rates have slowed down since 2017.”⁵

“California is still not reducing GHG emissions from passenger vehicles as needed under SB 375. Per capita GHG emissions continued to increase, albeit more slowly than in the 2018 Progress Report. ... Comparing observed data with SCS projections show that most MPO regions are not on track to meet GHG targets.”⁶

Given achievement of California’s climate strategy includes vastly reduced VMT targets noted above — and key metrics are moving in the wrong direction — there is little likelihood that California will meet this portion of statewide climate targets without a rapid course correction on land use and transportation planning and investment. Similarly, the 2022 California State Implementation Plan for Ozone attainment illustrated that mobile source emissions are a dominant threat to achieving clean air standards and that reducing VMT is “necessary to directly and immediately reduce mobile source NO_x and ROG emissions...” and “necessary to achieve federal air quality standards.”⁷ American Lung Association research shows that California communities continue to dominate the lists of the most polluted cities in America.⁸ Clearly, public investment for any new or legacy projects must no longer work at cross purposes to clean air and climate protection, which the SB 150 report and the CAPTI framework illustrate:

“Specifically, federal, State, and local transportation funding sources need better alignment with State objectives around climate and equity, and both new and existing funding sources

¹ CARB. 2022 Progress Report on California’s Sustainable Communities and Climate Protection Act (SB 150 Report) at p. 34. June 2023 <https://ww2.arb.ca.gov/sites/default/files/2023-05/2022-SB150-MainReport-FINAL-ADA.pdf>.

² CARB. 2022 Climate Change Scoping Plan. Appendix E: Sustainable and Equitable Communities at p 4. November 2022. <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-e-sustainable-and-equitable-communities.pdf>

³ CARB. Scoping Plan. Appendix E at page 4. <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-e-sustainable-and-equitable-communities.pdf>

⁴ CARB. SB 150 report. p. ES iii.

⁵ CARB SB 150 report. Appendix A: Regional and Statewide Transportation, Housing, and Land Use Performance Metrics Under SB 150 at p. 22. June 2023. <https://ww2.arb.ca.gov/sites/default/files/2023-05/2022-SB150-AppendixA-FINAL-ADA.pdf>

⁶ CARB SB 150 report. Appendix B: Comparison of Observed Data with SCS Forecasts for Selected Metrics at p. 8. June 2023. <https://ww2.arb.ca.gov/sites/default/files/2023-05/2022-SB150-AppendixB-FINAL-ADA.pdf>

⁷ CARB 2022 State Strategy for the State Implementation Plan at pp. 72-3. September 2022. https://ww2.arb.ca.gov/sites/default/files/2022-08/2022_State_SIP_Strategy.pdf

⁸ American Lung Association. State of the Air 2023. Most Polluted Cities. April 2023. www.lung.org/sota

should be designed in ways that are sensitive to community needs and flexible to change. Key opportunities to respond to these challenges include reimagining roadway projects that increase VMT, improving access to funding for multimodal projects, and prioritizing community needs.”⁹

Beyond lung-health emissions benefits, chronic illnesses and related deaths could be significantly reduced with greater progress toward VMT reduction. The Integrated Transport and Health Impact Model (ITHIM) housed online by the CARB research division illustrates the potential for far healthier communities. Based on the prior (2017) Scoping Plan targets for shifting to active transportation, the ITHIM projects over 11,000 premature deaths could be avoided annually by 2030 and nearly 15,000 deaths avoided by 2045.¹⁰ These results bolster the case for turning the trends toward success as continued failure to achieve the vision of SB 375 means community health improvements remain out of reach.

In closing, the American Lung Association’s recommendation for a public discussion of the SB 150 report follows our comments on the draft SB 150 report in June 2022, in which we called for clear accountabilities to be attached to the recommendations in the report (similar to the CAPTI framework’s assignment of responsibility). This sentiment was echoed in the conclusion of the final report, and speaks to the need for a meaningful discussion of the recommendations and clear accountabilities:

“CARB heard from many stakeholders that a helpful next step would be for the State and Legislature to identify and resource a stronger implementation framework for SB 375 that brings together regional and local government agencies, community groups, and the private sector to prioritize the proposed actions in this report, identify associated accountability measures for the prioritized actions, and advance and monitor the policy work to implement them.”

We are hopeful that with ongoing coordination between partners in local government, regional planning agencies, state partners and other stakeholders, the SB 150 report can help advance a healthier, more sustainable California. Please contact me with any questions or for more information at William.Barrett@Lung.org. Thank you for considering our request.

Sincerely,



Will Barrett
National Senior Director, Clean Air Advocacy

⁹ CARB. SB 150 Report at p. ES vi.

¹⁰ Maizlish N, Tomari K, Jiang C, Weiher A, Grajdura S, London JK, Rudolph L. California ITHIM, R/Shiny Version. User's Guide and Technical Manual. Davis, CA: University of California; 2019. <https://skylab.cdph.ca.gov/HealthyMobilityOptionTool-ITHIM/#Home>