



June 24, 2022

Ms. Liane M. Randolph, Chair
California Air Resource Board
1001 I Street
Sacramento, CA 95814

UPLOADED VIA SCOPING PLAN COMMENT PORTAL

Dear Chair Randolph:

Subject: Draft 2022 Scoping Plan

Thank you for the opportunity to comment on the Draft 2022 Scoping Plan. SANDAG appreciates the significant time and effort that the Air Resources Board (ARB) and the Environmental Justice Advisory Committee have taken to conduct outreach and develop an extensive plan that covers the wide-ranging actions needed to achieve carbon neutrality by 2045. SANDAG supports the focus on aligning state policy and programs with climate and equity goals and appreciates the emphasis on providing implementation support and resources for regional and local governments. Regions currently face many challenges with implementing their Regional Transportation Plans and Sustainable Communities Strategies, so state action to bolster regional resources and authorities to implement the most effective strategies in their plans will accelerate implementation of the most effective GHG reduction strategies

SANDAG offers the following comments for your consideration:

The Draft 2022 Scoping Plan breaks from the Senate Bill 375 (SB 375) targets in that it emphasizes reductions in Vehicle Miles Traveled (VMT) and not greenhouse gas (GHG) reductions per capita. Additionally, the selection of a new base year (2019 vs. 2005) and horizon years (2030 and 2045 vs. 2020 and 2035) is inconsistent with the SB 375 analysis framework. While SANDAG acknowledges the sunset of the 2020 target, most Regional Transportation Plans optimize land use and transportation solutions for 2035 given the current SB 375 targets. The relationship between the targets in the Scoping Plan and SB 375 should be clarified.

SANDAG appreciates the strategy area focused on managing the existing transportation system to advance climate, air quality, and equity goals. SANDAG's 2021 Regional Plan puts forth a vision for maximizing the investment in our existing infrastructure and managing the system to achieve our goals for reducing VMT and GHG. Our data-driven approach to planning has shown that infrastructure investments on their own do not impact VMT and GHG in a significant way. Operational improvements and policies are ultimately what is going to move the needle. State leadership is needed with implementing complex and controversial policies like pricing strategies and the conversion of general-purpose lanes to managed lanes. Further, research and experience have demonstrated that parking pricing and parking supply management are highly effective policies for encouraging sustainable travel choices. Reduced requirements for parking lower the cost of infill development, and less land dedicated to parking allows for more productive and sustainable uses of that land. Inclusion of parking

management strategies in the scoping plan and support from the state to parking management strategies is recommended.

In addition to pricing, SANDAG appreciates the reference to more affordable transit options that incentivize reduced GHG and greater equity. Free transit combined with a suite of pricing strategies is highly effective at reducing VMT and advancing equity. In just one month since the start of the SANDAG Youth Opportunity Pass program, which provides free transit to youth in the San Diego region, we have seen a 77 percent increase in the number of youth riders, a 36 percent increase in average weekday ridership, and greater than 50 percent increase in weekend ridership countywide.

The Scoping Plan should also consider incorporating strategies that implement safer vehicular speeds. Vehicular speed reduction is an effective method for managing the transportation system and contributes to reduced emissions. Furthermore, slower streets encourage more people to walk and bike comfortably and addresses the unacceptable increase in serious injuries and fatalities on our roadways.

SANDAG concurs with the framework of action built around policies that accelerate infill development, affirmatively further fair housing, and increase natural and working lands protection consistent with the State's Planning Priorities. We appreciate state funding programs like REAP and AHSC that advance our housing programs, but we encourage added flexibility to these programs to allow for faster implementation. To further reduce the barriers to building affordable housing, additional state action is needed to streamline CEQA review for infill housing projects and ensure that CEQA is not co-opted for goals outside of environmental protection.

We appreciate the ability to comment on the Draft 2022 Scoping Plan and we look forward to continuing to partner with ARB to achieve carbon neutrality by 2045.

Sincerely,



Coleen Clementson
Deputy CEO

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Enclosure(s)