



July 13, 2022

California Air Resources Board  
Sustainable Communities & Climate Protection Program  
Manager Leslie Kimura Szeto  
1001 I Street  
Sacramento, CA 95814

Dear Leslie Kimura Szeto:

On behalf of the American Lung Association, we are writing to comment on the draft progress report on Senate Bill 375 implementation. We commend the California Air Resources Board (CARB) staff for again preparing an important and thorough document. Our comments intend to highlight key themes of the report and offer suggestions for the CARB in terms of the next steps in achieving the health, equity, sustainability, and other benefits of SB 375 that have so far not been realized as demonstrated throughout this and other state reports.

A growing body of state analyses point to similar conclusions: transportation and land use policies and investments continue to push California further from healthy, sustainable communities for all residents. The California Transportation Plan 2050, the Climate Action Plan for Transportation Infrastructure (CAPTI), past and current CARB Scoping Plan processes, 2020 and previous Mobile Source Strategies, the draft 2022 State Implementation Plan, the Strategic Growth Council's AB 285 report, and the 2018 and current draft SB 150 reports all point to the need for better alignment of state transportation funding to achieve the health, equity and sustainability goals of SB 375. From an air quality perspective in the state with the most difficult air pollution challenges in the United States, it is clear that transportation and land use policies must change to support attainment of clean air standards.

These reports and plans indicate that insufficient change has materialized in over a decade of SB 375 implementation for a broad alignment of land use and transportation planning with healthier, more equitable or other positive outcomes, and that the opposite remains true in many cases. Still, as noted throughout many of the analyses, publicly-funded projects continue to work against these goals – and legacy projects loom that will take us further off course. Improving the policies and guidelines governing the expenditure of public funds – as well as proving new tools that prioritize healthier projects – is critical to changing course.

The report notes pockets of important progress, and there are certain areas of momentum to build on via some regional Sustainable Communities Strategies and local actions to innovate or – critically – to review and improve legacy projects designed before current standards. We also agree with many of the highlighted areas of ongoing challenge. We appreciate the litany of local, regional, and state incentives and new tools that *could* build toward success but remain concerned at the lack of policy changes to date. As the report notes (p.57), many efforts made to improve the mechanics of SB 375 – including bills designed specifically to implement findings of the previous SB 150 progress report – have failed passage in the Legislature. Again, we see this draft and other plans note that a shift in how California invests

public funding is the path to change. Public investment in projects that increase climate pollution, air pollution, inequitable access to housing or transportation, or otherwise threaten public health must not continue.

**Recommended Addition to Final Report and Dashboard.** CARB's report includes a dashboard of key metrics for tracking progress. The metrics show statewide and regional progress toward key outcomes, but is lacking when it comes to showing how the policies needed to affect changes have or have not been implemented. In past letters and comments to the board related to the Scoping Plan and Mobile Source Strategy, we have called for clear accountability measures to be attached to the findings of the original SB 150 report in 2018. We suggest that the dashboard is a proper landing for trackable, reportable and publicly-accessible metrics on the implementation of policies included in the draft SB 150 report. Ultimately, adding policies to the dashboard will identify where meaningful changes are happening as a tool to guide where public funding should flow, and where they are not occurring. CARB should follow the approach outlined in the CAPTI framework (p. 30) to specify lead agencies and report on the progress/lack of progress on each of the policies outlined in the Draft Progress Report.

**Important Themes to Retain in Final Report.** Even with these positive steps, the Draft SB 150 Progress Report highlights that in order for more meaningful change to occur, California cannot spend transportation funds in ways that undermine healthy, equitably communities or State air quality and climate standards. We encourage CARB staff to retain the following key themes in the final report to the Legislature:

- VMT reduction is necessary to achieve California's clean air and climate standards. (p.4), and VMT-reducing projects must be prioritized. (p.47-48, p.49)
  - CARB should apply specific and enforceable emission reductions to VMT-measures within the 2022 Ozone State Implementation Plan.
- Maintain focus on anti-displacement (p. 44), equitable demand strategies (p.45) as well as and equitable access to housing and mobility choices and demand strategies.
- Legacy projects must be reviewed for alignment with the CAPTI framework and modern standards. (p.47-48)
  - CARB should coordinate with state agencies and MPOs to provide lists of example projects that support/hinder SB 375 implementation or state climate and clean air standards as best practices/case studies.
- Retain and update the running list of legislative failure to improve SB 375. (p. 57).

We look forward to working with the staff and board, and other stakeholders and agencies to find a pathway to success. Thank you for your consideration.

Sincerely,

Will Barrett  
Mariela Ruacho  
**American Lung Association**

Linda Rudolph, MD, MPH  
**Center for Climate Change and Health**

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