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Strategic Growth Council
Attn: Lynn von Koch-Liebert
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RE: AB 285 Report

Dear Director von Koch-Liebert,

Thank you for the opportunity to comment on the Assembly Bill (AB) 285 Report that was delivered to the legislature on February 28, 2022. We appreciate the work done on the report and the commitment of the SGC staff at the February 24, 2022, council meeting stating that they would return to the council and the legislature this spring/summer to share the outcomes of the stakeholder engagement that staff has engaged in with us and others. We look forward to continuing to partner on actionable next steps.

The California Association of Councils of Governments (CALCOG) is a non-profit formed to serve regional governments across the state. Included in our membership are the eighteen Metropolitan Planning Organizations (MPOs) that are the focus of much of the AB 285 Report. Our members, along with local jurisdictions and transit agencies, partner with the State on many multimodal projects by leveraging local funds for state funds to deliver on improvements that address safety, climate resilience and ensuring our state's economic vitality remains strong. These corridors address regional priorities in our locally supported and adopted Regional Transportation Plans (RTPs) and Sustainable Communities Strategies (SCS) and meet state goals. As such, we offer the following comments.

Our Priorities

We support the integration of climate and equity goals in transportation planning, programming, and project delivery. In fact, most MPOs already include these goals, along with safety, fix-it-first, and economic prosperity in their RTP/SCSs that reflect local and regional needs but also meet state goals. However, the key findings from the AB 285 Report miss critical priority actions needed to achieve our climate goals. There are also some inaccuracies that need to be corrected.



Gap analysis of the CTP. The California Transportation Plan (CTP) should include a “gap” analysis that highlights what is necessary to achieve all of the state goals. In order to achieve its goals, what does the CTP assume in terms of land use and where growth happens? What does it assume about transit funding and service? What does it assume about pricing and replacing the gas tax? This kind of analysis will raise issues like replacing the gas tax, developing equitable pricing mechanisms, understanding the fiscal implications of electric vehicles, and enumerating potential state actions to address the six-percent emissions gap¹. These are necessary conversation to move the needle on our climate goals. Without understanding these issues, any changes to funding programs, state plans, etc. will simply be a short-term band aid that will not put us on track to achieving our long-term VMT and GHG reduction goals.

Consider all state goals. We also recommend that the state be clear about all its goals. The AB 285 Report has a focus on climate, which is one important goal. The CTP has eight goals including safety, equity, accessibility, economy, maintenance, environment, health/quality of life, and climate. The exercise of prioritizing or aligning all the goals becomes much harder when real tradeoffs must be considered. We know this because MPOs and RTP/SCSs are held to very different standards than most state plans, including the CTP. RTP/SCSs are ambitious yet achievable plans that, if implemented, achieve many goals (even sometimes what can feel like competing goals). These plans are measurable, actionable, and are constrained by time and funding. MPOs have a strong understanding of the levers needed to implement their plans and support their regions. But to effectively have that conversation, the state and other key stakeholders need to analyze and understand the CTP in the same way with the same constraints. Any revisiting of state goals and funding programs should include all stakeholders during all phases. These discussions must include real conversations about feasibility, responsibility, and trade-offs.

MPOs need partnership and resources to implement the RTP/SCS. We appreciate the report highlighting that MPOs do not have all of the funding or authority needed to implement their regional plans. The solutions here are not simple or straightforward. Strong partnership will be needed to understand what tools will be most effective for MPOs. Additionally, many MPO roles and responsibilities are federally mandated and MPOs are responsible for meeting these requirements as well. Any changes to MPO authority must involve MPOs at every decision point to ensure any proposed changes will be effective in RTP/SCS implementation and support their federal obligations.

¹ <https://calcog.org/sb-375-ghg-emission-gap-explained/>

Errors and Inaccurate Conclusions

Inaccurate representation of road projects. There are some errors in the MPO planning and spending data and much of the data is presented in a way that overgeneralizes road projects. Related, the report shows that the Central Valley and northern-state MPOs direct more funds to roadways than others. While this is accurate, the report also insinuates that this is negative or out of alignment with the state's goals, policies, and programs. That is not accurate. The report misses the fact that many road projects are needed operational improvements that will help with GHG reduction and/or provide new or improved bicycle and pedestrian facilities to increase safety for these transportation modes. Additionally, it's important to understand that in the Central Valley and northern-state specifically, transit spending is less than in more urbanized areas of the state because the geography and the pattern of development simply makes some transit investments infeasible.

Incorrect understanding of the TIP. While we appreciate many things in the UC report, we take exception to the interpretations of the MPO funding charts and related findings. The report says, *“Our findings show (Figure 4) that among the five case study regions, the state and federal—and in some cases, local—expenditures programmed in TIPs are generally less multimodal and more auto-centric than the investments outlined in MPOs’ long-range transportation plans....These results indicate that despite ambitious multimodal investment plans in some RTP/SCSs, the TIPs tend to frontload auto infrastructure and backload transit with their state and federal funding.”* This incorrectly assumes that TIPs reflect a region's long range transportation funding and priorities in its entirety. The TIP only reflects a portion of the plan's implementation. The only projects required to be in the TIP are regionally significant projects that are subject to the federal Clean Air Act or projects receiving federal or certain state funds. Generally speaking, this would be state and/or federally funded capacity projects (transit capacity and road capacity). Therefore, TIPs tend to be significantly skewed towards capacity projects. Most locally funded projects and projects with no significant air quality impacts are not always in the TIP. Examples of projects that are often not in TIPs may include road maintenance, transit projects, transit operations, or active transportation projects that do not rely on federal or state funding. Additionally, there is a wide range of RTP/SCS implementation activities that aren't even transportation projects that cannot be captured when looking just at the TIP.

Grouping the funding sources into project types also fails to capture what is really happening on the ground. TIPs generally rely on broad categories for classifying types of transportation projects. For example, a project might simply be listed as “road or highway capacity” or “road maintenance”. The nuance that is lost when summarizing based on these broad categories is that many road projects also include complete street and multimodal improvements such as bike lanes, sidewalks, transit features or maintenance benefits. Additionally, sometimes the TIP can completely leave out the multimodal portion of the

project because it's being funded from other sources. Because this detail is not reported out of the TIP at a high-level, the TIP funding chart is not able to capture this detail. This is misleading when presented in the report the way it is. It can also make it appear as though these types of projects are at odds with each other.

For all these reasons, TIPs are not an accurate representation of all the transportation projects being funded in a region and is not an apples-to-apples comparison with the RTP/SCS.

Concerns About the Opportunity/Issue Areas Prioritized by SGC

Balanced approach to reconsidering past commitments. The findings say that all levels of government should reconsider past funding commitments and their ability to meet our climate goals. But a critical point the report also makes (that isn't highlighted in the summary) is that finding a balance between keeping past promises and advancing current objectives will be important. A balanced, thoughtful and realistic approach includes stakeholders rather than top-down. Blanket assumptions about road and highway widening projects should not be made without considering all the other merits of the project, such as safety or economic prosperity, community engagement, and how far along it is in the planning and/or construction phase. It is also critical to remember that RTPs and the transportation projects are based on state and federal outreach requirements, including taking the input of local jurisdictions and local communities on their needs. Many transportation projects take 10+ years from conception to completion. Although we agree with evaluating projects for potential improvements, abandoning projects midway through the cycle or half constructed is a waste of public resources and undervalues the need for the project. A better solution is to focus on future projects in the conception phase. Not only how to help shape them to achieve climate and equity goals but also to move through the long transportation planning and funding process quicker.

Road projects are needed. Although some of the charts and findings in the UC report indicate that most MPO plans allocate more roadway funding toward maintenance, operations, and rehab than new facilities, some parts of the report blur the line. It seems to suggest that all road projects are not supportive of climate and equity goals. We disagree. As already noted, many road projects include multimodal improvements. Also, many road projects are in response to community priorities and needs. For example, when asked during RTP/SCS development, some historically disadvantaged communities prioritize road maintenance (fixing potholes, etc). Community engagement is a critical component of project and plan development that must be considered in decision making.

The view of roads is too narrow. This notion of pitting project types (transit vs. road) against each other undermines the purpose of SB 375 and SB 743. SB 375 is an intentional

effort to look at land use and transportation wholistically. It charges MPOs to create a SCS that, in its totality, achieve the greenhouse gas emission reductions target assigned by CARB. The MPO's achieve this while including a balance of project types—maintenance, operations, improvements, bus, rideshare, expansion, bike, and rail—for the region. Similarly, SB 743 requires VMT increasing transportation and land use projects to mitigate their impacts to the extent feasible. Together these provide the flexibility needed to forward the state's climate goals while meeting the unique needs and priorities of each region. A one-size-fits-all assumption that road projects are de facto out of alignment with state goals is too narrow view of how MPOs achieve climate goals.

The report should be more sensitive to rural context. The report and the SGC priority areas are centered on urbanized areas. More attention should be given to the different challenges and opportunities of our rural areas. Rural regions are home to vast forest, outdoor recreation, agriculture, and other natural resources enjoyed by all Californians. Consequently, these rural regions experience significant impacts related to a changing climate and related severe weather events such as wildfire, flood, and sea level rise. In order for these rural regions to flourish and remain safe and accessible for all, efforts to address climate change should be sensitive to such regional contexts.

When the report highlights a safety project in a rural area as potentially VMT inducing and out of alignment with state goals, an inaccurate and incomplete picture is painted. The VMT generated in most rural roadway safety projects is nominal. The report assumes that a rural roadway safety improvement project and an urban roadway widening project present a similar induced demand and increase to VMT. This is inaccurate. VMT is a very context sensitive metric and should be measured and considered accordingly.

Additionally, many rural projects are a direct response to the impacts of a changing climate, focused on improving the safety and operation of roadways which often serve as the only evacuation route in the case of a wildfire or other severe weather event. Such projects may include parallel capacity, roadway and bridge maintenance, general system preservation, or new roadway alignments which provide a secondary egress for rural neighborhoods. Rural regions are also tasked with maintaining significant lane mile inventory. Rural communities do not have the resident population or tax base to maintain or make necessary improvements to the system the same way more urbanized communities do. Applying a singular approach, will limit rural regions' ability to contribute to the climate change goals as well as maintain the existing and planned rural transportation infrastructure. Applying a singular approach and potentially further narrowing transportation funding opportunities, will limit rural regions' ability to contribute to achieving our climate goals as well as maintain the existing and planned rural transportation infrastructure.

Closing

Thank you again for your consideration of our comments. We are happy to meet and discuss or provide more detail on any of this as needed. Our desire is to be good partners in the state's effort to combat climate change. We look forward to continued engagement with SGC and other state partners.

Sincerely,



Jennifer Tendick
Director of Planning Policy, CALCOG