



December 1, 2021

California Strategic Growth Council
1400 Tenth Street
Sacramento, CA 95814
Submitted by email: transportation@sgc.ca.gov

Dear Senior Advisor Terplan and fellow SGC staff,

The undersigned organizations would like to respectfully submit the following comments for the Strategic Growth Council's (SGC) consideration for the AB 285 report.

First and foremost, we appreciate the time and work that SGC staff, and the UC team of researchers put into this report. We also appreciate being able to participate in shaping the research scope. As early supporters of AB 285, we believe in the importance of accountability

and transparency in transportation decision-making. As it was identified in the presentation of the draft findings, California is not on track to meet its climate and equity goals in the transportation sector. While we recognize that the state has made efforts to shift investments in transportation by creating and implementing the Climate Action Plan for Transportation Infrastructure (CAPTI), we know CAPTI is not enough. CAPTI only shifts a limited number of transportation funding programs. Due to CAPTI's limits around shifting the structures of transportation funding that are problematic - some of which are identified within the draft findings of the report- it is imperative that the AB 285 report makes strong recommendations.

The AB 285 report needs to include recommendations that address the most problematic structures of transportation planning. Some of the problems include:

- **The decentralization and limited coordination of transportation decision making (draft finding 1):** Planning and funding decisions are hard to follow because of how many transportation agencies, funding sources, and planning cycles are involved in transportation planning. This makes it difficult to track whether equity and climate goals are being met.
- **The lack of enforcement authority for metropolitan transportation organizations (MPOS) & lack of accountability to community transportation needs:** MPOs are the main agencies responsible for planning for greenhouse gas (GHG) reductions through SB 375. It has long been recognized that they have limited authority over whether local governments implement their regional transportation plan, which have strategies to reduce GHG. Moreover, the California Air Resources Board (CARB) conducted a public engagement process for their SB 350 Barriers report, and this revealed that the needs of residents in low- income and disadvantaged communities were not being adequately considered in transportation planning efforts. Legislative changes are needed to provide enforcement mechanisms, not only so that local governments are responsive to the regional vision, but so that regional transportation and local transportation planning are aligned with community needs.
- **The outdated statutes that continue to fund transportation projects that increase road and highway capacity, and emphasize automobility:** We recognize from the CARB SB 150 report that there are legal (and practical) reasons that transportation funding cannot shift. However, these laws are harmful, and they are counterproductive to the state's climate and equity goals. Legislative recommendations are needed to outline these outdated statutes publically and clearly. They should also direct this funding towards creating multimodal options, including non-motorized modes of transportation, and emphasize integrating transportation and land-use instead.
- **The disconnect between projects chosen, state and local funding programs, and the state's key goals; there are also legacy projects that no longer align with the state's climate goals. (Drafting finding #5, 6, 7):** Investments that continue to emphasize only automobility are unacceptable. Best practices in transportation planning recognize that to

reduce greenhouse gas emissions, transportation agencies should invest in connecting land-use and transportation planning, invest in pedestrian and biking infrastructure, and facilitate multimodal system improvements. These recommendations should also open or continue the discussion around reconsidering or modifying the projects in the “pipeline.” As Finding #7 states, California needs to reconsider past commitments to projects to meet climate goals.

The recommendations from the AB 285 report have the ability to help streamline transportation decisions, provide greater transparency and accountability and make it easier for people to understand and engage in transportation decision-making processes. We see this report as a powerful opportunity to shed light on some of these challenges in front of the legislature. For many of the challenges listed above, the legislature holds the power to change the statutes that govern how transportation funding is allocated, and which transportation agency has what authority. We want to ensure that the AB 285 report is making strong recommendations that will move us closer to our climate, health and equity goals.

Again, we appreciate this opportunity to comment. The AB 285 report and following recommendations will be key to improving the alignment of the state’s transportation investments with its climate and equity goals. Thus, we recommend that SGC make bold recommendations that will support the state’s efforts to shift transportation spending. We look forward to working together on these recommendations

Sincerely,

Nailah Pope-Harden, Executive Director
ClimatePlan

Jonathan Matz, California Senior Policy Manager
Safe Routes Partnership

Jared Sanchez, Senior Policy Advocate
California Bicycle Coalition

Matthew Baker, Policy Director
Planning and Conservation League

Caro Jauregui, Co-Executive Director
California Walks

Andy Hanshaw, Executive Director
San Diego County Bicycle Coalition

David Diaz, MPH, Executive Director

Active San Gabriel Valley

Laura Tolkoff, Transportation Policy Director
SPUR

Carter Rubin, Interim Director of Transportation
NRDC

Noah Harris, Policy Advocate
Climate Action Campaign

Hana Creger, Senior Program Manager of Climate Equity
The Greenlining Institute

Amy Thomson, Transportation Policy Analyst
TransForm