



February 18, 2026

The Honorable Monique Limón
 President pro Tempore
 California State Senate
 1021 O Street, Suite 7610
 Sacramento, CA 95814

The Honorable Robert Rivas
 Speaker
 California State Assembly
 1021 O Street, Suite 8330
 Sacramento, CA 95814

The Honorable Chris Cabaldon
 Member
 California State Senate
 1021 O Street, Suite 4730
 Sacramento, CA 95814

RE: Modernization of SB 375 - California's Foundational Regional Transportation Planning and Sustainable Community Laws

Dear President pro Tempore Limón, Speaker Rivas and Senator Cabaldon,

The Sustainable Communities and Climate Protection Act of 2008 (SB 375, Steinberg) was enacted with the purpose of reducing greenhouse gas emissions from passenger vehicles by applying California's climate targets to regional transportation and land use planning. The ambition of SB 375 was to make our communities more sustainable, more affordable, and healthier, all while protecting natural and working lands and saving taxpayer dollars by avoiding costly sprawl. The recently announced SB 1087 (Cabaldon) proposes amendments to SB 375 to alleviate the administrative burden of implementation for metropolitan planning organizations (MPOs)—and while that is a laudable goal, we are writing to ask you to ensure that any reform effort also take the opportunity to better align implementation with the law's original intended purpose.

Two decades after SB 375's passage, there remains a disconnect between California's climate goals and its governance of land use and transportation decisions. [Report after report and analysis after analysis](#) published over the past fifteen years highlight barriers to achieving intended goals and identify potential policy recommendations. The bottom line: California is still sprawling. [Ever-longer commutes](#) in ever-worsening traffic add to the cost of owning and maintaining a car—the average household's [second-biggest expense](#). Each [highway expansion adds to this traffic](#) despite promises to alleviate it, then taxpayers foot the bill in the form of growing highway system maintenance costs. As a consequence of all these dynamics, California remains off-track in hitting its tailpipe pollution reduction goals—contributing to some of the [worst air quality in the country](#).

In response to the law's implementation shortcomings, the state recently formed the [Sustainable Communities Task Force](#) to produce recommendations for strengthening implementation. The four biggest metropolitan planning organizations (MPOs) in the state have also signaled a desire for reform, issuing a [joint letter to the California Air Resources Board \(CARB\)](#) in 2024 expressing their concerns with the law. **These MPOs are jointly co-sponsoring SB 1087, seeking to reduce the administrative burdens of implementation and to secure regionally-controlled funding for implementation.** These actions reflect a growing consensus that this landmark climate law needs to be updated to deliver results for Californians.

Our coalition of climate, environmental justice, public transit, conservation, and affordable housing advocates are writing to draw your attention to this bill, and ask that any legislative reforms to SB 375 address these shortcomings by more directly tying this critical law's implementation to the clean air and affordability outcomes that all Californians deserve. Reform must strengthen planning

requirements to better align with the law's goals, prioritize implementation dollars for climate-supportive projects, and extend to state agencies the same climate mandate given to our MPOs. We have attached to this letter a memorandum describing our coalition's priorities for SB 375 reform in greater detail.

Sincerely,

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Leadership Counsel for Justice & Accountability

Priorities for Strengthening SB 375

The following recommendations are high level policy priorities that reflect input from climate, transportation, EJ, housing, and conservation advocates organized by the ClimatePlan network. We look forward to discussion and refinement of these policy recommendations through engagement with MPOs and other stakeholders.

Strengthen planning requirements to advance SB 375 goals:

1. **Ensure housing is being planned for in the right locations.**
 - a. **Prioritize infill housing** - Focus housing investment (preservation and new construction) in VMT reducing places and infill opportunity areas, including in small towns, unincorporated communities and underinvested neighborhoods, in modeling.
 - b. **Meet fair housing objectives** - Require MPOs to meet AFFH obligations by modeling housing in infill opportunity areas and relatively-lower VMT places within BOTH high opportunity areas AND historically disinvested areas with planned community investments; as well as by assessing and working to meet the mobility needs of members of protected classes.
 - c. **Assess climate risk for development** - Incorporate climate resilience as a factor for development on lands at risk of impacts such as wildfire and flooding and restrict additional growth in high risk areas.
 - d. **Identify Priority Conservation Areas** for ecologically significant lands to focus development outside of these areas (along the lines of MTC's program and LA County's Significant Ecological Areas program).
2. **Transportation capital projects must assume adequate funding for operations and maintenance in the plan**
 - a. **Highway and roadway expansion projects should account for the cost of maintenance** - revenue assumptions for expansion of roads and highways must include the additional cost of maintenance for those facilities.
 - b. **Transit capital projects should account for cost of operations** - Clarify that transit capital projects must include realistic funding levels in the plan to operate a standard level of service for future GHG reductions. For new transit projects to be included in the plan, project planning should achieve progress milestones established in the plan.

Ensure plan implementation aligns spending with climate goals:

1. **Regional/local transportation funding** - Require that near-term transportation funding in each region be prioritized for projects that reduce driving, avoid supporting sprawl, and meet investment targets for transit and active transportation in the long-term plan in order to achieve their regional GHG target.
2. **Incentivize housing production in lower VMT areas and infill opportunity areas,**

including in small towns, unincorporated communities and underinvested neighborhoods.

- a. **Provide new incentives** for housing development in lower VMT areas and infill opportunity areas with the most significant incentives reserved for deed restricted affordable housing.
 - b. **Condition allocation of State transportation dollars** and new funding such as REAP (both from the State to MPOs, as well as from MPOs to localities) on adoption of housing supportive policies, anti-displacement measures, and/or production of affordable housing in lower VMT areas and infill opportunity areas.
 - c. **Direct State funding** to affordable housing and associated infrastructure in lower VMT areas and infill opportunity areas throughout the region through existing state affordable housing and infrastructure programs, and/or new MPO-level funding sources.
3. **Conservation incentives** - disincentivize projects (housing production and transportation) that induce exurban housing and warehouse development and VMT and incentivize protection of open spaces and wildlife corridors for community health, climate and nature benefits.
 4. **Require or incentivize local jurisdictions to align their housing element, particularly their sites inventory, with SCS plans**, in addition to the other statutory obligations like AFFH, to ensure that new housing units are being planned and built in infill opportunity areas and VMT reducing places within jurisdictions, consistent with other statutory obligations.

Align state agency mandates with SCS mandates

1. **Align Caltrans funding decisions with SCS goals** - Require Caltrans to prioritize near-term transportation funding for projects that reduce driving and to fully mitigate any increase to driving generated by highway expansion projects in a timely and geographically-proximate way.
2. **Establish Caltrans climate performance management** - Establish a climate mandate for Caltrans to apply to the state highway system and require performance management to the climate target for district system management plans, managed lanes system plans, and corridor plans that are aligned with the RTP/SCSs. Require all highway projects to align with those plans.
3. **Extend CARB's regional target authority** - Extend CARB's authority to set GHG targets under SB 375 to 2045 to align with the state's net-zero emissions target.
4. **Empower the Strategic Growth Council or the Joint Meetings of CARB/CTC/HCD to play a role in review and approval of SCSs** - reinvigorate the interdisciplinary obligation of SGC to direct smart growth policy by stepping into the role of oversight on regional planning.
5. **Establish CTC climate funding mandate** - CTC should be given an official climate mandate via statute especially in the scenario where the joint meeting is empowered to review/approve SCSs and require all projects funded with competitive SB 1 funds to reduce GHG and VMT to support achievement of climate goals.