



May 6, 2022

Ms. Lynn von Koch-Liebert
Executive Director
California Strategic Growth Council
1400 Tenth Street
Sacramento, CA 95814

RE: SCAG Region Comments on California Transportation Assessment (AB 285 Report)

Dear Ms. Koch-Liebert:

On behalf of the Southern California Association of Governments (SCAG) and Southern California's six county transportation commissions, we want to thank you for the opportunity to comment on the findings of the California Transportation Assessment Report, authorized under Assembly Bill (AB) 285 (Friedman, Chapter 605, Statutes of 2019). This report provides an important starting point for conversations among the legislature, state agencies, metropolitan planning organizations (MPOs), transportation commissions, local governments, and the public to develop a shared understanding of the challenges and solutions needed to accelerate progress on the state's climate goals.

We agree with the objectives of the report and several of its findings, including that the transportation funding and policy landscape is complex, and reducing vehicle miles traveled (VMT) is extremely challenging in a growing economy. This strongly implies that additional data and a comprehensive understanding of transportation planning and funding will be critical to developing effective solutions. Therefore, we appreciate the Strategic Growth Council's efforts to engage stakeholders through working sessions after the release of the report and their encouragement of a thoughtful discussion of the problematic issues in the report before we proceed with identifying specific actions.

The following three fundamental concerns underscore the challenges we see in relying on the limited analysis in the AB 285 report to inform transportation policy and climate solutions.

First, Senate Bill (SB) 375 (Steinberg, Chapter 728, Statutes of 2008) was established with the goal of reducing per capita greenhouse gas (GHG) emissions at a *regional* scale, which is quite different from the alternative threshold presented through the AB 285 analysis. This analysis suggests any investment that could increase VMT at the project level is inconsistent with Sustainable Communities Strategies and climate goals. For more than a decade, the agencies within the SCAG region have worked together to forward successive regional plans that meet the state's prescribed GHG emission reduction targets while also addressing the unique opportunities and challenges in our region to meet broader environmental, economic and equity goals. We have done so through a balanced approach that recognizes mobility needs and options vary vastly across Southern California. This is important given that our economy and GHG footprint are not solely impacted by the movement of people but also goods, with an industry that generates more than a third of all jobs regionally. Further, freight is a critical component of the state's economy as millions of jobs statewide are tied to the supply chain, and all Californians depend on an efficient, reliable, and safe multimodal goods movement system to provide communities with their most vital necessities. It is imperative that the state reconcile climate goals with equally important economic and safety goals.

The report's conclusion about project level inconsistency is incongruent with our regional planning process which is focused on aligning the entirety of the system investments in our plan with transportation policies and a regional land-use vision to meet a broad range of objectives, including GHG reduction. The methodology and findings from the AB 285 report present highway projects, regardless of the multi-modal or systemwide benefits, as uniformly counter to the state's climate goals. For example, the report treats investment in priced express lanes that generate funding for transit in the same manner as it treats an investment in general purpose lanes. Similarly, by solely relying on Federal Transportation Improvement Program investments to assess plan implementation, the research methodology overlooks the significant regional investment in transit operations and complete streets projects which are frequently funded through local dollars or integrated into larger corridor improvement projects that may be classified generally as highway or local roadway improvements in the program listing. Most concerning, however, is the false dichotomy presented throughout the report between roadway investments and climate action, while our planning and modeling suggests both are critical to meeting state and local goals.

Maintaining the ability to plan regionally for GHG reductions in the SCAG region is central to achieving the state's climate vision. Progress cannot be assessed or achieved through a one-size fits all analysis or approach given the differences in the regions and the importance of integrated planning strategies.

Since SCAG's first joint Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) in 2012, our plans have encouraged and resulted in a greater share of overall investments in transit and active transportation largely due to revenues generated from Local

Sales Tax Measures. Since 2012, the region has added more than 760 miles of bike lanes and removed major capacity expansion projects from the RTP/SCS like the SR-710 extension and the High Desert Corridor. However, while infrastructure planning and investment decisions will continue to be a significant element of the RTP/SCS, SCAG sees almost double the GHG emission reduction benefits from the plan's policies and programs as it does from infrastructure investments. This highlights the importance of wraparound programs to support our investments and leads to our second fundamental concern with the report and its findings.

Second, by focusing the AB 285 analysis on infrastructure investment, the report misses an opportunity to account for progress on the most critical strategies for meeting the state's climate goals. Like SCAG's RTP/SCS, the state's climate vision, as reflected in the California Transportation Plan (CTP) 2050, relies on pricing strategies and mobility incentives to shift travel behavior over time. The CTP 2050 is built on the aggressive assumption that vehicle operating costs will increase by 50 percent, in part due to pricing mechanisms. However, the AB 285 report fails to address progress and alignment at the state and regional levels on this critical transportation planning and policy issue. The state lacks a comprehensive vision for how it sees working with the regions to transition to a user fee-based system, and, at the same time, it is slow to support interim steps that are moving us in the right direction, like the build-out of a regionwide express lane network.

Finally, the AB 285 report suggests that MPOs have little control and no effective oversight over whether local funds or land use actions help accomplish regional and state goals. In Southern California, the Regional Housing Needs Allocation plan tied a regulatory requirement for cities and counties to the RTP/SCS by allocating units based on the region's growth vision. While the ultimate oversight for this land-use law is the purview of the State Housing and Community Development Department, the allocation methodology was developed and adopted by SCAG's Regional Council with a clear intent to align regional housing and the climate vision embedded in SCAG's RTP/SCS. Cities and counties with the greatest job and transit access, as determined by SCAG's RTP/SCS, are now required to plan for 836,857 units in addition to those units required to address projected growth. This is nearly as much housing as the whole region produced in the last twenty years.

Achieving this sustainable and equitable land-use vision ultimately depends on the private sector to produce housing where the cities are planning for it, which demands a significant public investment in the infrastructure needed to accommodate growth. SCAG needs more tools to help cities with housing element updates, and for tools beyond planning to fund affordable housing and supportive infrastructure, rather than more policing powers. Most urgently, our cities and counties need more time to effectively implement the regional housing policy vision and engage with communities to ensure context sensitive and implementable solutions.

While we believe there are fundamental gaps in the AB 285 analysis that limit its usefulness in policy discussions, we do recognize that more needs to be done to align state and regional plans and actions to meet state climate goals. Despite each of our RTP/SCSs meeting our prescribed GHG emission reduction targets, we acknowledge the findings of the Senate Bill 150 (SB 150)

report showing that MPOs across the state are falling short in meeting planned VMT and GHG reductions. However, real solutions to this challenge require a greater understanding of the combination of strategies approved in regional plans and the specific barriers to their implementation.

The regional planning process is designed to confront this very challenge by requiring MPOs to revisit the plan with each four-year update cycle. This requires us to refine existing strategies and assess the chronic or emergent challenges facing the region. In the SCAG region, there are a series of challenges that we know we must address moving forward. Below we have listed examples.

- More housing and growth has occurred close to jobs and transit than we projected in 2012, but we have seen limited progress in shifting the regional growth pattern. It is noteworthy that about 95 percent of the region's housing stock was built before the passage of SB 375 and overall household growth has been 40 percent less than projected. Therefore, slow growth has limited the impact of our land use strategies and the pace of change from this strategy.
- Transit ridership has plummeted. This is a trend that started before the pandemic despite billions of dollars in investment. Most people do not use transit to commute, even those in low-income households and in households with no vehicle. Our research suggests the solution to better serving our low-income communities requires rethinking and restructuring funding for transit operations as well as looking more broadly at the mobility ecosystem to improve access through a variety of modes.
- The SCAG region has experienced 20 percent growth in warehousing facilities since 2014. This far exceeds our regional projections. The overall growth in goods movement has caused significant challenges across the supply chain and transportation networks. Challenges that must be addressed at least in part through capacity improvements to the roadway network as more than 90 percent of daily truck trips in the region serve local distribution and market needs that cannot be addressed by rail.
- A recent SCAG-led study concluded that increasing access to and adoption of high-speed internet service (broadband) has the potential to reduce VMT and GHGs by up to 15 percent when people use it to telework and access remote services. However, despite lower-income households having far less access to broadband itself, greater VMT and GHG reductions are seen from increased access to higher-income households. This is because a much higher proportion of low-income households work in "essential" fields that cannot be converted to teleworking. So, while achieving universal broadband is necessary to meeting equity goals, using it to reduce VMT is a much more complicated endeavor than just providing access.

These challenges reflect the complexity of reducing VMT while advancing equity and economic opportunity and are specific to SCAG but familiar to the challenges faced by other regions across the state. As we kick-off the Connect SoCal 2024 update, we look forward to the participation

and partnership of the legislature, state agencies, regional partners, and the public to chart a path that aligns our climate vision with broader environmental, economic and equity goals. We are benefitting greatly from the original Regional Early Action Plan (REAP) resources, and the REAP 2.0 investments will provide support for meeting the sixth cycle RHNA goals and to test new mobility solutions that could reduce VMT. Additional recommendations are attached. These recommendations are organized around themes in the AB 285 report related to achieving actionable solutions.

Again, we appreciate this opportunity to share our perspective. Ultimately, we agree with our MPO and transportation planning partners across the state that reforming SB 375 is not the most urgent need in accelerating progress toward the state’s climate vision. We can certainly do better and urge consideration of how we partner more effectively to achieve state goals through implementation of the strategies in our plans rather than pursuing a uniform, statewide solution.

Sincerely,



Kome Ajise
Executive Director
Southern California Association of Governments



David Aguirre
Interim Executive Director
Imperial County Transportation Commission



Martin Erickson
Executive Director
Ventura County Transportation Commission



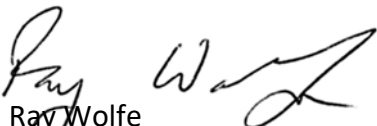
Darrell E. Johnson
Chief Executive Officer
Orange County Transportation Authority



Anne E. Mayer
Executive Director
Riverside County Transportation Commission



Stephanie Wiggins
Chief Executive Officer
Los Angeles County Metropolitan
Transportation Authority



Ray Wolfe
Executive Director
San Bernardino County Transportation
Authority

Additional Recommendations:

We look forward to working with the State to develop actionable solutions around the topics raised in the AB 285 report. We offer the following perspectives:

Assessing MPO and local government roles and responsibilities:

Agencies within the SCAG region have an established practice of working collaboratively to develop our RTP/SCS. SCAG also offers local planning assistance through grants or direct assistance to support RTP/SCS implementation. However, these programs are chronically oversubscribed. In addition, while the region is big, most cities are small with nearly 60 percent of local jurisdictions having populations under 60,000 residents. More authority to MPOs would not solve either the resource or capacity constraint barriers to RTP/SCS implementation.

Where regions and local jurisdictions could use more authority is in the ability to generate steady, predictable revenue streams for community reinvestment. This could be accomplished through congestion pricing, express lanes and CEQA reform.

Updating and better alignment among existing state and regional plans.

To better align state and regional plans, state plans should be held to similar requirements and standards as regional plans. For example, the California Transportation Plan should be revisited to add a financial analysis, and bold assumptions should be rigorously vetted to clearly illustrate what is necessary to achieve these climate goals. Further, it is imperative that the state reconcile climate goals with equally important economic and safety goals. A balanced approach to all these goals is critical to meeting the needs of varying communities throughout the region and state.

Aligning existing funding programs with state goals.

As stated above, the SCAG region sees twice as much GHG emission reductions from policies and programs as it does from infrastructure investment. Therefore, the state needs to focus on programs and operations as much as, or more so, than infrastructure. The state should prioritize rail and bus transit capital, operations, and maintenance by funding programs to facilitate capital and operational improvements that modernize the system. Additionally, the state should recognize and elevate the role of incentives and pricing for both reducing VMT and better managing the system. For example, proceeds from pricing strategies can be funneled into greater investments into strategies that increase housing near jobs and transit, as well as the transit system itself. Pricing itself can simultaneously discourage discretionary trips and shift trip modes by moving travelers away from the use of single occupancy vehicles to walking, cycling, transit, transit carpooling, or some combination leading to a more sustainable transportation system that reduces both VMT and GHG.

Implementing the Sustainable Communities Strategies is the best way to achieve the GHG reductions from the transportation sector. SCAG advocates for state and federal funding for those strategies which yield the greatest reductions in GHG. In January of this year, SCAG's

Regional Council took formal action to support a major expansion and augmentation of the Infill Infrastructure Grant (IIG) Program as its top legislative priority this year. Specifically, SCAG supports:

- Increased funding for the IIG program in the amount of \$5 billion;
- Establishing a state-administered Technical Assistance program to assist small and medium-sized jurisdictions to apply and compete for these funds.

The IIG program provides funding for infrastructure that supports higher-density affordable and mixed-income housing in locations designated as infill. Developers and local governments partner to apply for grant funding for sidewalk and streetscape improvements, water, sewer, or other utility service improvements, transit linkages, transit shelters, or other infrastructure needs that facilitate infill housing in climate friendly, infill locations. These projects' proximity to transit reduces commute distances and times, thereby serving as a key strategy to help our region achieve its GHG reduction targets.

The AB 285 report background included an apt projection from the FHWA, "VMT will continue to increase as the result of population increase, rising disposable income, increased GDP, growth in the goods component of GDP and relatively steady fuel prices." Our collective responsibility as state and regional agencies is to counteract per capita VMT growth with an economic strategy that gives local governments the resources or tools to stimulate growth in sustainable communities.

Reevaluating project and program funding and reviewing the current transportation project pipeline.

As stated above, SCAG balances several goals in preparing each RTP/SCS including improving mobility and supporting a vibrant economy alongside our air quality and GHG emission reduction goals. When we analyze the performance of the plan, we analyze the whole system. Reevaluating projects on an individual basis and on narrow performance metrics could miss the bigger picture of how that project may be contributing to the whole system performance.

Additionally, agencies within the SCAG region have been successful in passing local sales tax measures to fund transportation system improvements. These funds can be used to support GHG reduction strategies, but current commitments to the voters need to be delivered to maintain public trust and support for future local funding options.