



1415 L Street,
Suite 300
Sacramento, CA
95814

916.321.9000
sacog.org

April 29, 2022

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

RE: California Transportation Assessment (Pursuant to Assembly Bill 285)

Dear Ms. von Koch-Liebert:

Thank you for inviting comments on the California Transportation Assessment. We appreciate the work done by the California Strategic Growth Council and the University of California Institute of Transportation Studies research team on their report on the state of transportation policy, planning, and implementation in California. The Sacramento Area Council of Governments (SACOG) looks forward to continued partnership with our transportation peers at the local, regional, and state levels to make progress toward shared climate and equity goals.

SACOG has nearly two decades of experience analyzing the relationship between land use decisions and travel behavior. Our SACOG Regional Transportation Plan (RTP), regionally called our Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), outlines a path for improving our air quality, preserving open space and natural resources, and helping California achieve its goal to reduce greenhouse gas (GHG) emissions that contribute to climate change. SACOG, like many of our regional counterparts have spent decades cultivating knowledge and relationships at the local and state levels to develop these long-range visions which seek to improve the lives of our residents. We firmly support equipping MPOs with the appropriate tools and funding needed to address some of the implementation challenges documented in the California Transportation Assessment. SACOG urges the state to partner with MPOs to supply regions with the additional tools and funding needed to accomplish our mandates.

SACOG concurs with a number of the findings highlighted in the California Transportation Assessment, including the need to align the goals of various state programs and agencies; the benefits of reviewing current policies and programs to verify their alignment with state goals and make alterations if needed; the challenges presented by the mismatch in MPO responsibilities and tools in both the transportation and land use spaces; and the value of instituting and evaluating demonstration programs that deploy innovative solutions to institutional challenges. As the state now turns to acting on the recommendations included in this report, SACOG appreciates the opportunity to provide feedback to ensure that resulting changes best empower regional agencies to support our shared climate and equity goals.

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Yuba County

To harmonize state planning efforts to best support state goals, seek alignment with actions that support MTP/SCS implementation at the regional level and focus on the prioritization of cost-effective, equitable solutions.

SACOG agrees with the report's conclusions that the state should assess its policies and programs to identify and rectify any conflicting state goals and actions. In pursuing this effort, it is critical that climate and equity goals be advanced as equals. To do so, the state must better prioritize its investments while considering financial capacity, weighing tradeoffs across a broad range of policy objectives and goals. This would help to address a deficiency in current state plans, including the California Transportation Plan (CTP) and State Rail Plan, that are largely aspirational in nature, and it could inform future shifts in transportation monies that would better advance local priority projects that support sustainability and equity goals.

Reforming existing state funding programs, while necessary, will require close collaboration with MPOs to ensure that changes recognize the unique circumstances withing each different region of the state and do not conflict with steps to further empower MPOs to implement MTP/SCS recommendations. This could include aligning state funding to immediately support and prioritize regionally identified priority transportation projects, as well as programs, with the biggest GHG emissions reduction benefits. This includes providing state competitive funding incentives for these regionally identified projects and programs.

To implement MTP/SCS strategies more effectively, MPOs need both increased funding and appropriate implementation tools across the interrelated spheres of housing, land use, and transportation.

SACOG concurs with the report's finding that MPOs are well-suited to implement the recommendations included in MTP/SCS documents, though efficacy is limited by a lack of implementation tools and funding. In particular, housing and land use policies have proved to be among the most effective ways to reduce GHG emissions, yet to realize these reductions good planning needs to be translated into implementation.

Additional MPO-controlled funding that is flexible enough to support transportation, land use, or housing investments is needed, which could come through the augmentation of existing funding programs or through new state programs, such as a third round of the Regional Early Action Planning Grant funds or a reimagining of Infill Infrastructure Grant (IIG) program to provide focused funding for SCS implementation. Expanding the IIG program to help fund SCS implementation would provide upfront investments in critical infrastructure in broader low VMT infill corridors to make it economically viable for developers to build more housing in these climate friendly locations. Critical to this is ensuring access to patient money to fund necessary infrastructure to unlock the potential for development. These are areas where the infrastructure needs to be installed before the housing and the most transformational projects may not be the most shovel ready.

Beyond funding, MPOs need a more varied array of tools to get from MTP/SCS recommendation to implementation. This could include expanded ability and state funding to pilot innovative approaches within their boundaries and stronger partnerships with the state that allow the option for the MPO to spur state implementation action. Given that the report does not make detailed prescriptions on ways to enact changes to MPO roles and responsibilities, SACOG strongly recommends involving MPOs at every decision point in order to steer policy changes in the most effective direction.

To measure MTP/SCS implementation, take a more holistic look that expands beyond the Transportation Improvement Plan to cover the wide range of funding spent on transportation.

Transportation funding actions included in the region's Transportation Improvement Plan (TIP) represent only a fraction of the work needed to implement the coordinated transportation and land use recommendations included in the MTP/SCS. Relying on the TIP as the sole data point excludes impactful policy work like land use changes, public transit fare policy reform, electric vehicle incentives, seamless transit enhancements, and roadway pricing. Rather than utilizing the TIP to assess implementation, SACOG recommends that the state work with MPOs to understand all of the components and strategies in the MTP/SCS that get to the unique situational needs of the MPO in terms of equity, environment and economy.

Thank you for your consideration of these comments. We look forward to continuing to work with you to improve planning processes at the local, regional, and state levels to deliver a more sustainable, equitable transportation system to benefit all Californians today and into the future. Please contact Christina Lokke, Director of Legislative and External Affairs (clokke@sacog.org) with any questions or to discuss further.

Sincerely,



James Corless
Executive Director