RIVERSIDE COUNTY TRANSPORTATION COMMISSION

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April 28, 2022

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

RE: Comments on the AB 285 California Transportation Assessment Report

Dear Ms. von Koch-Liebert:

The Riverside County Transportation Commission (RCTC) participated in a series of public discussions and workshops regarding the California Transportation Assessment Report, prepared by the Strategic Growth Council pursuant to AB 285 (Friedman). RCTC prioritized this participation, both in its position as the regional transportation planning agency and as the administrator of a local voter-approved sales tax measure dedicated to transportation improvements in Riverside County.

As part of this dialog, RCTC respectfully raised concerns regarding the misplaced findings of the report. While RCTC supports continued action to address climate change, the AB 285 Report wrongfully directs blame at local and regional governments such as county transportation commissions for existing transportation systems, when they were forced decades ago to fill the void created by the state abdicating responsibility to fund and maintain its transportation systems.

As a body of local elected officials, RCTC's goal is to ensure the wellbeing and prosperity of Riverside County residents. Separation of powers are enshrined in our constitution, and local governments are respected as the purest, most direct form of representation and constituent response. Despite portrayals of county transportation commissions being unaccountable to the impacts of our transportation systems on the climate, they have in fact been leading in many of the areas the state is now focused on, from integrated planning and advanced mitigation, to implementing rideshare programs and express lane networks that manage congestion and bolster transit alternatives.

Indeed, local governments and particularly self-help counties have been filling the gap created by the state's lack of attention for decades—doing as the state directs and allows, without necessary funding. County transportation commissions took on this role not out of fealty to the state, but out of obligation to their constituents and neighbors. RCTC and its local partners are working every day to help our constituents achieve their goals and aspirations in life. Considering the long-term neglect demonstrated by the state until the approval of SB 1 in 2017, county transportation commissions do their job very well.

The following are RCTC's comments on the Strategic Growth Council's five recommendations offered in the AB 285 Report. The common thread of RCTC's concerns and proposed solutions is the firm belief that the state must either properly fund and manage its transportation systems, or step aside as local and regional governments continue to do the state's work for them.

RCTC is a willing partner and has every interest in working with the state to turn the page toward innovative, sustainable transportation solutions that are accessible, equitable, and inclusive. But these inequities look different from community to community and from region to region. We must work together to avoid the worst impacts of climate change.

If you have questions, please contact Interim External Affairs Director David Knudsen at (951) 787-7141. I look forward to the continued discussion and collaboration.

Sincerely,

Anne E Mayer

Anne Mayer
Executive Director

Enclosure: RCTC Comments on the AB 285 California Transportation Assessment Report

1. Dramatically Increase State Funding for Multimodal Transit Systems *before* Reprogramming Existing Funding Sources

The recommended realignment of state funding programs such as State Highway Operation and Protection Program (SHOPP) and State Transportation Improvement Program (STIP) fails to recognize the staggering investments the state must make—not just in coastal urban centers, but also in more inland regions—before a comprehensive rewrite of critical funding programs can be considered. To place the cart before the horse would deny under-resourced regions and their disadvantaged communities of a ***just transition*** to a climate-resilient future because many communities do not have the operational funding, infrastructure, or necessary rights-of-way to immediately transition away from roadway usage.

If it were not for voter-approved transportation plans and local sales tax measures in Riverside County, the limited state resources available to our region would have left people and goods gridlocked. As a result of historically limited state and federal funding, we have areas where transportation infrastructure and transit options are decades behind where we want them to be – even areas with dirt roads and no transit access.

Should already-meager state funding programs be aligned to state goals without any new investments, the state will perpetuate regional inequities across the state. Coastal urban communities would be even more competitive for these funding programs than they are today, and inland regions without the benefit of continued investment and development from the state would be left behind. With the dramatic growth of population and goods movement in our region, we may never catch up without overwhelming state investment.

If the state reverses its decades of disinvestment in transportation solutions, the state may then look to consolidating grant programs as a source of savings for time and funding for state and local agencies alike. While competitive programs are well-intended in the context of scarce funds, they fragment the intended benefit for under-resourced regions. For these reasons, formula funds must continue to be invested in and strengthened.

2. Regional Plans are Making Significant Progress, but Require More Time and Funding before Review for Further Updates

Each year the state directs Metropolitan Planning Organizations (MPOs) to revise and expand their regional planning responsibilities. Not only are MPOs complying, real progress is being made toward carbon reduction through regional collaboration. Since its first adoption in 2012, Southern California Associated Governments' (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) has leveraged voter-approved sales tax measures for further investment in transit and active transportation, resulting in over 760 miles of bike lanes added across the six-county SCAG region. Notably, SCAG credits its plans for twice the amount of greenhouse gas reductions as infrastructure investments. Furthermore, SCAG utilizes the RTP/SCS to identify cities and counties with the greatest job and transit access when drafting the Regional Housing Needs Allocation plan, requiring local planning for 836,857 new housing units where they are most needed in a sustainable manner.

The state is searching for the silver bullet, but progress takes time—and money. What the state can do is produce sustainable, achievable, and financially constrained goals, as the AB 285 Report recommends for the California Transportation Plan, and MPOs will continue to do the same, as they have done for over 40 years.

3. Increase Funding and Cut Red Tape to Shorten the Project Pipeline and Limit Future Misalignment

Before the state considers deprogramming pipeline projects solely based on how they are categorized in the Federal Transportation Improvement Program, it should consider the significant local investments that have been made in complete streets through these projects from improved walkability to bicycle access.

The state should further consider how this problem arose – from decades of disinvestment from the state, forcing county transportation commissions to fund needed system improvements with voter-approved sales tax measures. While these measures were designed to encompass the immediate and projected mobility needs of the regions they serve, continued decreases in state investment and exponential increases in regulatory and environmental reviews propagated the unsustainable backlog of projects the state now blames county transportation commissions for planning.

The solution would not be to add yet another layer of review from state agencies such as Caltrans, which is notoriously insular in its development of policies and guidelines. State agencies are disconnected from the communities they attempt to serve, and it shows in proposed policies that do not reflect realities on the ground. If state agencies and bodies were as open, transparent, communicative, and collaborative as local and regional governments, then many of the problems the AB 285 Report seeks to address would not exist.

Any perceived misalignment between local projects and state goals may be significantly limited in the future if the state takes action to increase funding and cut red tape. Doing so will restore and preserve the responsiveness of these planned projects to the mobility needs of regions across the state.

4. Maintaining State-Owned and -Operated Transportation Systems Should be a Priority in the Assessment of Roles of State Transportation Institutions

The current state of goods movement is a prime example of the state's abdicated responsibility. Our state and region's freight rail systems are bursting at the seams, but when county transportation commissions turn to operational improvements on highways to streamline goods movement and limit impacts to residents—even managed express lanes that improve mobility choice and support express bus service—the state flags them as "increased capacity and inducing vehicle miles traveled."

For years, the state seemed content with relegating our inland region as the state's distribution center. Forty-two percent of the nation's goods travel through Riverside and San Bernardino counties. This commerce is an economic asset to the state, but a public health and socioeconomic hindrance to our region. Unfortunately, no amount of existing federal, state, and local funding would allow our region to build multimodal systems from the ground up that can relieve residents from goods movement congestion. Riverside County residents are competing with freight haulers to get to their destinations every day, but it should not have to be that way.

If the state took responsibility for the funding and management of freight and goods movement, it would be better positioned to balance climate goals with improved safety and economic growth, and county transportation commissions would at least have more of their already-limited funds to plan projects that expand multimodal options.

5. Provide Funding and Flexibility to Sustain the Roles and Responsibilities of MPOs and Local Governments

MPOs and local governments have been doing the state's job—and doing it well—for decades. Problems arise when the state constantly steps in to move goalposts, without consideration for progress made, nor state funding needed to achieve the new goals. Self-help counties are not the problem. They have been the solution, generating local sales tax revenue to fund and maintain state transportation systems. Would the state be any closer to its climate action goals today if self-help counties did not invest $6 billion annually over the last 30 years? The answer is no. What would Californians' air quality, health, and economic well-being be as they attempted to crawl from their more affordable homes in inland areas to their jobs in coastal counties? The answer is bleak.

Transportation programs and projects funded by sales tax measures are directly accountable to the voters that approved them, and these ordinances cannot be changed easily. In Riverside County, it would take the approval of RCTC, followed by the approval of each city council and the Riverside County Board of Supervisors before the Measure A expenditure plan could be revised. These transparency and accountability provisions were intended to preserve the will of the voters, but top-down changes to local funding programs could strand disadvantaged communities and leave whole regions behind.

In addition to generating funding when the state would not, county transportation commissions were incubators for innovative policy solutions, from active transportation, rideshare programs, and tolled express lanes, to advanced mitigation programs such as the Western Riverside County's Multiple Species Habitat Conservation Plan, which expedites project delivery while preserving the region's natural habitat. In fact, before the state began to recognize the intersection of housing, environment, and transportation policies, Riverside County did so on its own with the Riverside County Integrated Project, which set a vision for the county with input and buy-in from the building industry, property owners, and environmental groups. This plan was adopted 20 years ago, and it is as relevant now as it was then. This vision is the guide for Riverside County, which is experiencing the fastest population growth in the state – balancing housing, transportation, and the protection of our natural habitat.

In each of these areas of innovation, the state has been woefully behind the curve. When the state finally turned its focus to active transportation, climate solutions, and equity for disadvantaged communities, the region was thrilled. But time and again, the state develops guidelines that favor dense urbanized regions like those along the coast, leaving inland regions behind. Without funding and flexibility, the state robs inland regions of a just transition to a climate resilient and equitable future that the administration claims to want for all.