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June 21, 2022

The Honorable Lena A. Gonzalez  
Chair, Senate Committee on Transportation  
California State Senate  
State Capitol, Room 405  
Sacramento, California 95814

**RE: Opposition to AB 2438 (Friedman), as Amended on June 16, 2022**

Dear Chair Gonzalez:

On behalf of the Riverside County Transportation Commission (RCTC), I write in opposition to AB 2438. As written, the bill would require specified funding program guidelines or plans to include strategies established in the Climate Action Plan for Transportation Infrastructure (CAPTI).

RCTC recognizes the state's intention to secure an equitable and climate-resilient future, including for residents in Riverside County. However, AB 2438 as amended continues to leave room for conflict with promises the State made in the voter-affirmed SB 1, despite CAPTI affirming its intent to not change program guidelines beyond current code.

While the recently adopted amendments attempt to broaden the author's coalition, the new language instead defers the scope of guideline changes to agency implementors. Even with the proposed public outreach processes, which appear to mirror current practice, RCTC is concerned that state agencies and departments would have the ability to implement guidelines as prescriptive as the previous bill language.

Our most disadvantaged communities, who drive to access their jobs or education, do so not necessarily out of preference, but because meaningful multimodal transit alternatives do not yet exist for them. Inland regions already struggle to compete for state transportation funding programs. Their lack of resources, necessary rights-of-way, or sufficient multimodal transit networks from which to augment, would make their applications even less competitive against those from coastal urban centers. Not only would AB 2438 restrict RCTC's ability to compete for state funding for projects that would provide meaningful alternatives to driving, but it would also cut funding eligibility for projects intended to provide congestion relief for communities in the interim.

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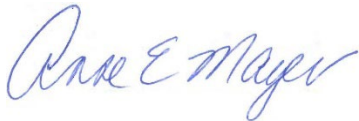
AB 2438 fails to recognize the staggering investments the State must make in inland regions *before* a comprehensive rewrite of critical funding programs can be considered. To place the cart before the horse as AB 2438 does would deny under-resourced regions and their disadvantaged communities of a ***just transition*** to a climate-resilient future. Instead, many will be forced to compromise the socioeconomic well-being of their families with traffic. With the dramatic growth of population and goods movement in our region, as well as the further narrowing of state funding programs that AB 2438 proposes, it will only get worse for these communities.

RCTC appreciates the author's continued recognition of the need for the CTP to consider the full cost of implementation, as well as available resources. Such an analysis that may be objectively compared to regional plans and priorities is long overdue, but RCTC sees this, along with substantial state investment in the development of multimodal systems in inland regions with new funds, as a prerequisite before a comprehensive rewrite of existing funding programs may even be considered.

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.

AB 2438 does not provide our communities with the investments and flexibility required to build the capacity of our multimodal transit systems, therefore threatening to leave our region and others behind. For these reasons, RCTC opposes AB 2438. If you have any questions regarding RCTC's position on this issue, please contact me at (951) 787-7141.

Sincerely,



Anne Mayer  
Executive Director

CC: Assemblymember Laura Friedman  
Members of the Riverside County State Legislative Delegation