



January 21, 2025

Chair Carl Guardino and Commissioners  
 California Transportation Commission (CTC)  
 1120 N Street MS 52  
 Sacramento, CA 95814

Chair Liane Randolph and Board Members  
 California Air Resources Board (CARB)  
 1001 I Street  
 Sacramento, CA 95814

Director Tony Tavares  
 California Department of Transportation (Caltrans)  
 1120 N Street  
 Sacramento, CA 95814

Director Gustavo Velasquez  
 California Department of Housing &  
 Community Development (HCD)  
 651 Bannon Street  
 Sacramento, CA 95811

**Re: New Urgency Needed to Accelerate Transportation Emissions Reduction**

Dear CTC Commissioners, CARB Board Members, Director Tavares, and Director Velasquez,

The undersigned organizations write to you with new urgency upon the inauguration of a new federal administration requesting that you accelerate efforts to implement sustainable communities strategies (SCSs) and shift investment in our state transportation system to reduce the need for Californians to drive. In the next four years of the Trump Administration our state's ability to regulate electric vehicle and truck technology may be greatly diminished and necessitate that we make even more progress in reducing driving to achieve our climate goals, a policy area that is entirely within state and local government control. **California must stop future highway expansion that worsens traffic and instead scale up our investment in public transit, active transportation, and affordable infill housing to provide sustainable, equitable, and affordable options to people to avoid driving.**

We are not making progress anywhere near the rate required to change how California communities and the transportation systems that serve them are built, in line with the vision of SB 375 (Steinberg, 2008) and the SCSs that followed. Reducing driving by 25 percent per capita by 2030 is a critical component of the emissions reduction paradigm outlined in the 2022 CARB Scoping Plan<sup>1</sup>, without which we will not achieve our ambitious climate goals. Instead of reducing driving, CARB's SB 150 progress report<sup>2</sup> demonstrates clearly that vehicle miles traveled in every region of the state has returned to pre-pandemic levels and continues to rapidly increase, causing a proportional increase in greenhouse gas (GHG) emissions.

The primary reason for this lack of progress is simple: ***every region of the state, in partnership with Caltrans and CTC, continues to prioritize investment in expanding highways*** that fuels more driving and worsens congestion, while making public transit and active transportation investment a secondary priority. By worsening traffic congestion, highway expansion compounds the burden of air pollution, noise, and traffic fatalities that fall most heavily on our disadvantaged communities adjacent to freeway corridors. Highway expansion in some cases directly displaces and destroys housing in vulnerable communities, exacerbating our state's housing crisis. In all cases highway expansion facilitates driving farther to reach housing developments at the edges of existing communities and farther from daily destinations and job centers. This locks residents into long, expensive commutes. As the cost of owning and driving a car rises, we must provide more affordable infill housing near those daily destinations within existing communities of all sizes - in rural towns and urbanized areas - as well as convenient and affordable travel options for people to opt out of driving. Every dollar that the state spends on adding traffic-inducing highway lanes is one dollar less to spend on making desperately needed road repairs, constructing safer streets, and improving public transit, which would create at least as many jobs.

Agencies across California have no shortage of needs for road maintenance and repair, transit operations and capital projects, and shovel-ready active transportation projects that could be prioritized for funding instead. Cycle 7 of the Active Transportation Program demonstrated the overwhelming and growing demand for funding for highly popular walking and bicycling

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<sup>1</sup> [2022 Climate Change Scoping Plan APPENDIX E SUSTAINABLE AND EQUITABLE COMMUNITIES | California Air Resources Board](#)

<sup>2</sup> [2022 Progress Report - California's Sustainable Communities and Climate Protection Act](#)

projects, with nearly 300 applications and \$2.5B in funding requested this year. The Bay Area's transit agencies have a projected operating budget shortfall of \$919M in FY 26-27<sup>3</sup> and LA Metro forecasts a \$555M operating shortfall in FY27<sup>4</sup>. These numbers don't account for the transit needs in the rest of California and the accessibility needs of California's aging population identified in the state's Master Plan for Aging.

Our transportation emissions challenge will grow much larger in the next four years as we lose a strong federal partner in the work to address climate change and fund infrastructure, and California must be prepared for this reality. With the failure of USEPA to act on California's Clean Air Act waivers for truck and locomotive regulation, we should at the least expect a big change in the trajectory of emissions reduction that we have assumed the state can achieve through regulation of heavy-duty fleet technology. In that case, we will need to increase the trajectory of emissions reduction that we can achieve from the strategies within the control of the state, regional, and local governments, namely by expediting implementation of SCSs and reducing the demand for driving.

We urge you to seize this critical moment to accelerate the shift in transportation priorities toward much greater investment in public transit, active transportation, and affordable infill housing and away from highway expansion. Our top-line recommendations are as follows:

1. **Convene a task force with representatives of state, regional, and local agencies, academic experts, labor unions, NGOs, and other stakeholders to develop policy recommendations to equitably shift future investment away from highway expansion and toward transformative improvements that provide safe, convenient and affordable alternatives to driving.** Model this task force after the SB 125 Transit Transformation Task Force, which has successfully convened diverse stakeholders to identify priority actions to grow ridership, improve the experience for transit riders, and address the operating funding challenge that many public transit agencies face. A highway transformation task force could support the development of reform recommendations to the Legislature.
2. **Require Metropolitan Planning Organizations (MPOs) to prioritize transportation investments that reduce driving in their regional transportation plans (RTPs) and programming documents.** We are concerned about the request by MPOs across the state to pause and reevaluate the SB 375 framework at a time when we critically need to strengthen the mandate for implementation of SCSs and focus near-term investments on projects that reduce driving. We share the frustration that MPOs and CARB have spent significant time and resources mired in debates about SCS modeling assumptions, as these debates distract from the much bigger issue of inadequate plan implementation. If they are truly committed to reaching the GHG targets in their SCSs, MPOs must demonstrate meaningful and proportional progress in the near-term toward intermediate targets and prioritize funding to projects that reduce driving in their four-year programming documents, also known as regional transportation improvement plans (RTIPs). As a first step, MPOs should increase the transparency of impacts and benefits

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<sup>3</sup> <https://mtc.legistar.com/gateway.aspx?M=F&ID=c782a463-aea4-4b81-aca5-6c962506e345.pdf>

<sup>4</sup> [LA Metro FY2025 Budget Development Update 1/17/24](#)

that will result from all projects listed in their RTPs by evaluating and listing projects based on their potential to increase driving.

3. **Avoid weakening the mandate under SB 1 (2017) that a region must have an adopted SCS that is approved by CARB to achieve the regional GHG target in order to be eligible to nominate projects for transportation funding from the Solutions for Congested Corridors Program (SCCP) or Trade Corridors Enhancement Program (TCEP).** As regions continue to advance highway expansion and delay transit and active transportation projects that reduce driving, MPOs have had an increasing challenge in each subsequent four-year update to their RTP demonstrating a feasible path to meeting the GHG target set by CARB. Rather than prioritizing projects for funding that reduce driving and emissions, regions may seek a change to SB 1 that would enable them to continue business-as-usual and still maintain eligibility for transportation funding from SCCP and TCEP. We do not support weakening this mandate in SB 1, which is the only meaningful incentive for strong GHG-reducing regional plans. Instead of reducing these planning standards for funding eligibility, ***we recommend limiting the project eligibility criteria for SCCP and TCEP to only projects that improve the transportation system without increasing driving.***
4. **Align the 2025-26 Transportation Budget as well as any new transportation revenue sources with CalSTA's Climate Action Plan for Transportation Infrastructure (CAPTI).** CAPTI has demonstrated success at beginning to shift existing state funding programs to projects that reduce GHG emissions, and the CAPTI action plan update currently underway outlines many areas where more progress can be made. In collaboration with Caltrans, the Mineta Transportation Institute published a study<sup>5</sup> that found that policy changes under CAPTI have succeeded in shifting the balance of investments away from traffic-inducing projects while maintaining job quality and access for California workers. The 25/26 State Budget presents an immediate opportunity to strengthen the mandate even further for state programs to prioritize projects that provide sustainable and equitable alternatives to driving. That same priority should be applied to any new transportation revenue sources under consideration. A road charge replacement for the gas tax or registration fees is a critical opportunity for further aligning investment of transportation revenues with state goals under CAPTI. If a replacement is proposed for the electric vehicle road improvement fee established in SB 1, those funds in particular should be limited to climate-beneficial transportation improvements.
5. **Strengthen community engagement requirements for transportation projects to ensure future investments provide meaningful and direct benefits to disadvantaged communities, using the Caltrans Transportation Equity Index (EQI)<sup>6</sup>.** The EQI was published in 2023 as the state's first priority populations screening tool that is focused specifically on those neighborhoods that are most burdened by and receive the least benefit from transportation systems. We recommend using the EQI to

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<sup>5</sup> [Evaluating Benefits from Transportation Investments Aligned with the Climate Action Plan for Transportation Infrastructure \(CAPTI\)](#)

<sup>6</sup> [Caltrans Transportation Equity Index \(EQI\)](#)

identify transportation priority neighborhoods where community engagement should be strengthened for all projects to ensure the communities themselves are directly involved in identifying direct and meaningful benefits and avoiding harms from those projects.

6. **Articulate a “plan B” for meeting the emission reduction targets in the Scoping Plan** to compensate for any anticipated shortfall in emissions reduction that result from losing a strong partner in the federal government in the work to advance our climate goals. Plan B should rely on those policy arenas entirely within the control of state, regional, and local governments in California, such as prioritizing transportation investment toward climate-beneficial and VMT-reducing projects. We recommend ensuring that the SB 375 statutory horizon year for sustainable communities strategies extends beyond the current deadline of 2035 to at a minimum match the 2045 Scoping Plan horizon for achieving a statewide net-zero GHG emissions target.
7. **Reform the Transportation Development Act so that funds earmarked for public transportation projects cannot, under any circumstance, be re-allocated to roadway projects.** Written in 1971, this law is in need of reform as regional transportation planning agencies utilize the “unmet needs” process to divert Local Transportation Funds to building and repairing roads.

We believe that SB 375 has worked well in creating very ambitious SCSs that demonstrate a potential sustainable future in each region, however the state has not succeeded at ensuring implementation of those plans. In large part this is because we have not been successful in significantly changing priorities for funding transportation infrastructure and shifting away from highway expansion. According to CAPTI, ***“we cannot continue the same pattern of highway expansion investment in California and expect different results. Rethinking our approach to highway expansion projects will be a critical part of ensuring we are working towards equitably meeting our climate change goals.”***

Our organizations stand ready to help and urge you not to delay in accelerating efforts to implement SCSs and change priorities for transportation investments. We welcome the opportunity to partner with you to realize the vision of SB 375 and make even greater progress toward our climate, equity, quality of life, and affordability goals over the next four years.

Sincerely,

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