



August 7, 2024

California Transportation Commission
1120 N Street MS 52
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Re: SB1121 Funding Assessment

Dear Chair Guardino and Commissioners:

On behalf of the undersigned organizations, we write to share the following comments regarding the SB1121 funding assessment, based on materials and discussions at the recent workshops.

SB1121 requires the California Transportation Commission, “in consultation with CalSTA and Caltrans, to prepare a needs assessment of the cost to operate, maintain, and provide for the necessary future growth of the state and local transportation system for the next 10 years.”

Discussion at the workshop was oriented toward developing a revenue-neutral plan to transition from the declining gas tax to a VMT fee, in one or more steps. However, a revenue neutral funding needs

assessment would not meet statutory requirements to identify the full needs of California's transportation system.

Despite SB 1121's requirement to conduct a full assessment of the costs and needs of California's transportation, workshop participants were encouraged to constrain public comments to revenue neutral proposals, but that is not the language of the law.

The assessment must identify transportation investment needs that are required by law and statute.

Identify investments needed to meet statutory climate targets

To reach statutory climate targets, CARB scoping plan identifies a need to reduce VMT 25% below 2019 levels by 2030 and 30% below 2019 levels by 2045. The needs assessment must identify what investments in public transit and active transportation are necessary to achieve those targets.

Identify investments needed to comply with the Clean Air Act

Over a dozen regions in California are designated as Nonattainment for one or more National Ambient Air Quality Standards. These regions are therefore required under the federal Clean Air Act to develop plans meeting specific requirements depending on the severity of the pollution problem. The needs assessment should include investments required to meet Clean Air Act requirements that are related to the SB 1121 focus on (1) Bicycle and pedestrian facilities; (2) Local streets and roads; (3) Highways, bridges, and culverts; (4) Transit systems, commuter rail systems, and intercity rail systems, including the operation of those systems.

Identify investments needed to comply with California Air Resources Board regulations

To the extent they're not already covered in local plans, the needs assessment should identify the investments required to fully comply with the CARB regulations, including but not limited to the Advanced Clean Cars Rule, the Advanced Clean Trucks Rule, the In-Use Locomotive Rule and the Innovative Clean Transit Rule.

Identify investments needed to comply with the Americans with Disabilities Act

The Americans with Disabilities Act (ADA) prohibits discrimination and ensures equal opportunity and access for persons with disabilities. Public agencies are required to comply and ensure that public facilities, including sidewalks and public transit systems, are accessible to all travelers regardless of disability. The needs assessment must identify the investments needed to bring all transportation systems in the state into compliance with the ADA.

Include funding needs for accessible public transportation services

In addition, the presentation noted that information about public transportation needs is being gathered from the Regional Transportation Plans in various regions. However, the needs for paratransit and dedicated accessible transportation are not required to be included in RTPs. We understand that the underlying data may not be easily available in a standardized manner - which is all the more reason to ensure that these important needs are covered in the funding assessment.

We thank you for your consideration and would be happy to meet with you or CTC staff to discuss further.

Thanks,

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