

(LTC Letterhead Placeholder)

June 10, 2022

The Honorable Frank Bigelow
Member, California State Assembly
Capitol Office, State Capitol
PO Box 942849
Sacramento, CA 94249-0005

Transmitted via US Postal mail and website contact page submittal

RE: Opposition to AB 2237 (Friedman): Transportation planning: regional transportation improvement plan: sustainable communities strategies: climate goals.

Dear Assembly Member Friedman:

Along with the Rural Counties Task Force (RCTF), California State Association of Counties (CSAC), CalCities, Rural County Representatives of California (RCRC), Urban Counties of California (UCC), many of our fellow counties and transportation agencies (both rural and urban), and other organizations, the Mono County Local Transportation Commission (Mono County LTC), comprised of both Mono County and the Town of Mammoth Lakes, opposes Assembly Bill 2237. While the intent of the bill to reduce climate impacts and increase multi-modal transportation options is laudable, the requirements of the bill unfortunately have the potential to impact the ability to: 1) deliver critical projects, 2) reduce local funding control, and 3) create costly mandates that would impact limited financial and staff resources.

The bill's requirement to rank and prioritize all Regional Transportation Improvement Program (RTIP) projects for funding and implementation based on alignment with sustainable communities strategies (SCS) and state climate goals creates new challenging and costly responsibilities for regional agencies. First, it should be noted that many rural counties, like the Mono County LTC, are not required to prepare SCSs, but the bill does not clearly exempt those counties. Mono County has prepared a Resource Efficiency Plan, similar to a climate action plan, and attempted to adopt it as an SCS by the LTC. The County and LTC were told by the California Air Resources Board that SB 375 does not apply and therefore our agencies could not adopt an SCS. Further, the bill also does not specify how the analysis for ranking project alignment with an SCS and state climate goals would be achieved. Most rural counties do not collect the kind of data or conduct modeling for all projects that could be required for this process, creating a new and potentially costly mandate that would impact limited regional resources.

State Transportation Improvement Program funds programmed through RTIPs are one of the few somewhat flexible funding sources available to rural regions, and we rely on that flexibility to fund a wide range of projects, including active transportation and transit projects as well as safety and operational roadway projects. The bill's requirement that projects in RTIPs "shall not induce vehicle miles traveled" is very concerning for rural regions, where safety projects on rural roads and highways may be viewed by the state as inducing vehicle miles traveled (VMT). For example, US Highway 395 (US 395) is a major transportation corridor connecting millions of visitors annually from the greater Los Angeles region to the natural wonders of Mono County. The two-lane sections of US 395 experience preventable fatalities from attempts to pass slower semi-trucks and recreational vehicles, and therefore widening projects are primarily for safety purposes rather than increasing capacity. However, the state priorities would categorize such critical safety projects as increasing VMT, preventing funding under AB 2237. Thus

rationale and potential impact could affect other critical projects, such as evacuation routes, as well. It's important to keep in mind that not all transportation projects that increase capacity result in induced demand/VMT particularly in rural areas.

We also are concerned with the proposed requirements regarding local transportation tax measures. Local sales tax measures are approved by voters based on a certain expectation of how funds would be spent. Subjecting these voter-approved measures to review and recommendation by state agencies would undermine the trust of voters and be counterproductive if recommendations are inconsistent with the approved measures.

Although we support reducing climate impacts and expanding multi-modal choices, the requirements and implementation proposed by AB 2237 could negatively impact rural areas. Therefore, the Mono County LTC respectfully opposes AB 2237 and requests your office take action at the appropriate time to protect rural transportation agency local funding control and critical programming.

Sincerely,

John Wentworth, Chair

Cc: Mono County Board of Supervisors
Town of Mammoth Lakes
Caltrans District 9
Inyo County Local Transportation Commission
Rural Counties Task Force
California State Association of Counties (CSAC)
CalCities
Rural County Representatives of California (RCRC)
Urban Counties of California (UCC)