



March 11, 2020

Chair Suen and Members of the Sacramento Transportation Authority (STA) Board,

On behalf of Sacramento Metro Advocates for Rail and Transit (SMART) and SacMoves, we want to voice our strong support for the recommendations of Sacramento Mayor Steinberg and the California Air Resources Board (CARB) in their respective letters to the STA Board on March 5, 2020. **In particular, we support the Mayor's proposal to restrict the use of Measure A proceeds to projects that are included in our region's adopted Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS).**

This simple requirement would ensure that Measure A funds will not be used on projects that would impair the county's and region's ability to comply with federal air quality standards or the state-mandated greenhouse gas (GHG) reduction target of 19 percent for our region. As the MTP/SCS is regularly updated every four years to reflect then applicable air quality standards and GHG reductions for our region, that percentage is likely to increase, further diminishing the viability of some of the larger road capacity projects currently included in the proposed expenditure plan.

As you know, our broad-based coalition of business, labor, and community groups has consistently advocated for a balanced expenditure plan that will help: (1) achieve our region's vision of a seamless transportation network offering a wide range of accessible, affordable, and efficient transportation choices, coupled with safer neighborhoods and a stronger economy; (2) conform to federal air quality and state GHG reduction mandates; and (3) compete for state and federal matching funds to build projects of lasting value for our county.

During this process there has been a substantial amount of give and take among all stakeholders and competing interests to arrive at the compromise 60/40 road/transit allocation. **If Measure A revenues exceed the \$8.4 billion anticipated, we urge the Board to allocate increased revenues to transit.**

This process has also seen an emerging consensus on the importance of building complete streets that provide safe travel for all modes, including pedestrians and bicyclists. This consensus is reflected in the proposed ordinance's Guiding Principles, including the principle

that the expenditure plan “improve air quality, reduce greenhouse gas emissions, and support local and state climate action goals.” Now is the time to ensure these guiding principles and policies are actually implemented. In addition to the amendments designed to ensure compliance with the region’s MTP/SCS, air quality, and GHG mandates referenced above, we want to highlight a few other issues of significance:

1. Adopting staff’s proposed Road Health and Safety policy and revising staff’s proposed Complete Streets policy;
2. Adding a VMT Performance and Mitigation policy;
3. Expanding the Advanced Mitigation Program; and
4. Clarifying the Plan Amendment process.

Adopting Staff’s Proposed Road Health and Safety Policy and Revising the Complete Streets Policy

We express gratitude to each of your Public Works departments and other participants in the Professional Advisory Group (PAG) for working with our coalition representatives to develop consensus language to the Road Health and Safety policy in Section G of the Implementation Guidelines. However, we believe the language for the Complete Streets policy needs to be revised to ensure that improvements to safety, access, and mobility for all users will be inherent in all projects. Bicycle/Pedestrian Master Plans focus on specific users of streets and trails, so they cannot effectively be substituted for Complete Streets guidelines and standards that cover all users. **We recommend that the Board revise the Complete Streets language to make Bicycle/Pedestrian Master plans or similar documents adjuncts to a Complete Streets policy.**

Adding a Vehicle Miles Traveled (VMT) Performance and Mitigation Policy

To strengthen Mayor Steinberg’s proposed amendment, we recommend adding a new requirement that the five-year programs submitted by recipient agencies must be consistent with the VMT and GHG reduction targets for our region set by the state pursuant to SB 375 and SB 743. This would ensure that Measure A-funded projects achieve or mitigate to a no-net increase in per capita VMT and meet our 19% GHG reduction target. STA must work closely with SACOG to routinely assess whether the recipient agency annual updates of the five-year programs and associated land uses will, in the aggregate, achieve VMT and GHG reduction targets. A process of regular regional assessment and continued give-and-take with local agencies is critical, because falling short of the targets will threaten both the health of our communities and the availability of State transportation funds.

Expanding the Advanced Mitigation Program

We support staff’s new language in Ordinance Section IX.D making the Advanced Mitigation Program (AMP) eligible for funding under the Sacramento Countywide Transportation Mitigation Fee Program (SCTMFP). Senate Bill (SB) 1 (2017) created the AMP to enhance

opportunities for CalTrans to work with stakeholders to identify important project mitigation early in the project development process and improve environmental outcomes by mitigating the effects of transportation projects. STA's AMP would complement SB 1's advance mitigation program. In addition to the SCTMFP proposed in the ordinance, a fee on major road capacity projects could help fund the local program.

Clarifying the Plan Amendment Process

We recommend that the Board reinstate the prior introductory clause to the Plan Amendment Section XXIII that states: "except as set forth in Section 180207 of the Public Utilities Code." This state law allows, but does not require, the STA Board to "annually review and propose amendments to the county transportation expenditure plan adopted pursuant to Section 180206 to provide for the use of additional federal, state, and local funds, to account for unexpected revenues, or to take into consideration unforeseen circumstances." At the last Board meeting there was a brief discussion among some of the Board members that this clause may be unnecessary because the amendment process in Section XXIII already allows amendments every 10 years "to meet changing transportation needs, priorities, and revenue estimates, and to ensure that the program reflects contemporary community desires in light of changing demographics and technology." However, given the possibility of significant changes to state and federal law regarding GHG reduction or other air quality laws, having flexibility to make adjustments more often should be preserved. In addition, the stated grounds for amending the ordinance under the Public Utilities Code ("to provide for the use of additional federal, state, and local funds, to account for unexpected revenues, or to take into consideration unforeseen circumstances") are not otherwise included in Section XXIII's 10-year language.

In conclusion, we urge the Board to adopt the changes outlined in this letter to the staff's proposed ordinance and expenditure plan. We believe that, with these changes, the plan will put our county in a better position to comply with state and federal air quality, transportation, and climate change mandates and to compete for state and federal funds as well as private investment and jobs for our county.

On behalf of the SMART/SacMoves, we are yours truly,

Steve Cohn
Roger Dickinson
Glenda Marsh
Emel Wadhvani
Sue Teranishi
Chris Holm
Deb Banks
Corey Brown
Doug Thompson
Matt Baker