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Sacramento Area Council of Governments

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September 30, 2025

The Honorable Toks Omishakin
Secretary, California State Transportation Agency (CalSTA)
400 Capitol Mall, Suite 2340
Sacramento, CA 95814

Subject: Senate Bill (SB) 125 Transit Transformation Task Force

Dear Secretary Omishakin:

The Sacramento Area Council of Governments (SACOG) commends CalSTA for facilitating the critical discussions of the Transit Transformation Task Force and providing a statewide forum to collaborate and chart a vision for the future of transit in California. SACOG represents 28 cities, 6 counties, and 11 transit operators in the state's capital region who are working to tackle the most pressing transportation and housing challenges through partnership, collaboration, data-driven decision-making, and innovation.

The 2025 Blueprint, the region's draft Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), is our most recent example of this. The Blueprint is SACOG members' plan to build a connected region that includes transportation options for residents, affordable housing for the region's growing population, and equitable investments that give all community members access to a safe and healthy region. Public transit plays a central role in the success of the Blueprint's goals. For example, 68 percent of housing and employment growth is projected in communities with existing transit service – requiring the region to triple the amount of transit service to meet its climate target. Additionally, about 6 percent of households in the region do not own a car and are disproportionately low-income and people of color. Investing in transit is an investment in a more equitable and economically competitive region.

Despite this critical role, public transit in the region faces major challenges ahead. The pandemic's unprecedented impact on ridership amidst post-pandemic travel patterns required the region's transit operators to swiftly adapt while facing significant increases in costs due to inflation, supply chain issues, and a competitive labor market. While overall transit ridership in the region remains below pre-pandemic levels, the region's transit operators were up for the challenge – ridership on most of the region's local bus routes has fully recovered to 2019 levels.

However, funding and regulatory challenges threaten this progress in the short-term and the ability for the region to achieve the Blueprint's goals in the long-term. The Task

Force's thoughtful engagement on how to tackle these issues creates momentum for legislative action and provides optimism for the future of transit in the capital region and across California.

In support of the Task Force's efforts, SACOG respectfully submits the following policy priorities and recommendations for consideration by the Task Force.

Reconsider the Innovative Clean Transit (ICT) Rule Implementation Timeline

Electrification of the transportation sector is an important component of achieving California's climate goals given that the sector accounted for 39 percent of total emissions in the state in 2022. However, buses make up less than 1 percent of these emissions.[1] At the same time, the region's transit operators are facing challenges on multiple fronts in their transition to zero emission buses – from supply chain constraints, vehicle and infrastructure costs that are double those of existing fleets, and technology limitations that require more vehicles to deliver today's service levels.

The opportunity cost of the ICT rule is the ability for the transit operators to invest in more frequent and reliable service across the region to strengthen ridership growth, improve transit's competitiveness with other travel modes, and ultimately provide a more efficient strategy for meeting the goals of the state across multiple fronts, including climate, equity, safety, and mobility.

For these reasons, we urge the Task Force to recommend that the legislature reconsider the ICT's implementation timeline.

Increase State Investment in Transit Operations and Capital Investments through Long-Term Sustainable Funding Sources

The region's primary strategy of tripling transit service and increasing ridership to achieve the Blueprint's goals is unattainable without additional investments in transit from the state. Most recently, the state doubled down on its commitment to transit through the extension of the Cap-and-Trade Program, which honored investments to support transit operators facing a "fiscal cliff" through the SB 125 Transit Program, as well as long-term operating and capital support through the Transit and Intercity Rail Capital Program (TIRCP) and the Low Carbon Transit Operations Program (LCTOP).

Building on these investments will be critical to ensure that transit operators in the region and across the state are able to deliver the level of service that is needed to make headway on statewide and regional goals. Expanding existing revenue sources and exploring innovative revenue mechanisms, such as road user charges and tolling, can provide transit operators with stable, inflation-protected funding for operations and capital investments in the long-term.

Modernize Performance Measures to Improve Clarity, Accountability, and Context-Sensitivity

Existing, expanded, or new funding sources should be tied to measurable outcomes, improving accountability and return on investment. Today, the region's transit operators already follow a performance-based approach and reporting process for federal and state transit funding programs. Aligning and streamlining performance measures ensures that transit operators have the clarity and transparency needed to deliver effective and efficient transit service.

Additionally, context- and geographically-sensitive performance measures are important to ensure that rural and small transit operators receive the support they need to provide lifeline transit service in our community while recognizing their unique circumstances. SACOG, as the MPO and RTPA, already works closely with our regional transit operators to evaluate transit's performance through the long-range transportation planning process, as well as through other federal and state programs (e.g., Transportation Development Act's Triennial Performance Audits).

This existing working relationship and mechanism for evaluating performance means that regions are best positioned to implement and set priorities for these efforts without an additional layer of state oversight. For this reason, we urge that the Task Force recommend the legislature to empower RTPA's, like SACOG, to implement and support efforts that ensure funding is effectively driving transformational change.

Thank you for your consideration of SACOG's policy priorities and recommendations. SACOG and the region's transit operators are fully committed to working with CalSTA to advance our shared vision for a transformational transit system that centers the rider experience and makes progress on our mobility, climate, equity, and economic goals. We look forward to continuing our work with the Task Force to address these challenges and deliver a set of truly transformational recommendations to the Legislature.

Sincerely,

James Corless
Executive Director
Sacramento Area Council of Governments