

December 3, 2024

Chair Carl Guardino
California Transportation Commission
1120 N Street
Sacramento, CA 95814

Re: Public Comments on Draft 2024 Climate Action Plan for Infrastructure (CAPTI):CTC Actions

Dear Chair Guardino:

The Central Coast Coalition (CCC) is thankful for the opportunity to provide public comment to the California Transportation Commission (CTC) on the Draft Climate Action Plan for Transportation Infrastructure. The Coalition greatly appreciates CalSTA's leadership on the Climate Action Plan for Transportation Infrastructure (CAPTI). The CCC supports the State's goals to aggressively combat and adapt to climate change while supporting public health, safety, and equity.

Our Coalition participated in the September public workshops on the next update to CAPTI and would like to provide the following feedback on the Draft Actions and Descriptions included in the CAPTI 2.0 Document released by CalSTA on November 1.

Overall, we request that any updated CAPTI Action Ideas or recommendations not be applied to the Senate Bill 1 Cycle 4 evaluation process. The California Transportation Commission (CTC) approved the SB1 Cycle 4 guidelines in August 2024 following a robust public engagement process. Agencies have submitted their applications to the CTC based on those adopted guidelines. For agencies co-nominating with Caltrans, collaboration and nominations were based on CAPTI 1.0 and the Caltrans System Investment Strategy (CSIS). Modifying the process for applicants at this point would be detrimental to the process.

As we strive to partner with the state on mutual objectives of reducing greenhouse gas emissions and enhancing mobility options for all users, we ask that you consider the following perspectives and solutions for the four strategies that CAPTI 2.0 proposes:

General Comments:

- We believe that the CTC is delivering on the goals of CAPTI with their guidelines development process and projects funded through SB1 competitive programs. This is illustrated by projects funded through SB1 Cycle 3 which made CAPTI goals a priority with the evaluation and award of projects. The process is working, and further restrictions should not be placed on the CTC SB1 process.
- The Draft CAPTI 2.0 places an emphasis on applications that state that they are Vehicle Miles Traveled (VMT) neutral. We request that VMT neutrality be further defined in the final CAPTI 2.0 document. Many regional and local partners help implement corridor improvements on the state highway system through a combination of funding sources outside of SB1 applications thus capturing VMT is a challenge. We believe there should be a focus on providing flexibility with how those corridors are implemented.



Comments on Draft Strategies:

Strategy 1: Transforming the Future of the State Highway System

While we appreciate the opportunity and vision to prioritize transit on the state highway system, adding additional fixed route service without ridership demand, under the current farebox recovery ratio requirements, and without additional resources to supplement existing service, is not feasible in our region.

The Central Coast, comprising the counties of Santa Cruz, Monterey, San Benito, San Luis Obispo, and Santa Barbara, has a population of 1.5 million. We do not have the same traffic volume as urbanized areas in the Bay Area, Los Angeles Basin, or San Diego, so managed lanes do not pencil out in our region. We would not have any excess revenue generation to dedicate towards multimodal options.

We appreciate efforts to incorporate climate resiliency planning to maintain the integrity of vital routes on the state highway system. These routes facilitate national goods movement and serve as lifeline routes and evacuation routes during natural disasters, particularly for disadvantaged communities that must rely on automobiles to go to work or seek educational opportunities. Multimodal investments are already included in CAPTI 1.0.

The Central Coast supports zero-emission infrastructure investments and additional funding for zero-emission freight and transit vehicles. We have been diligently working with Caltrans to install regional charging stations. Solutions for compelling mode shift in our region should focus on enhancing or establishing passenger rail service, such as augmenting LOSSAN or Metrolink service and providing connectivity between San Luis Obispo and Gilroy, where service does not exist.

Strategy 2: Reducing Greenhouse Gas Impacts of Transportation Investments

The state must consider areas where capacity expansion is necessary to address climate adaptation and resilience or to close gaps in evacuation routes to prepare for natural disasters or other climate events. Highway 101 is the Central Coast's "main street," a critical arterial for most of the region, a lifeline and evacuation route, and is integral for interstate commerce. When Interstate 5 closes annually due to inclement weather over the Grapevine, Highway 101 becomes the only north-south arterial in the state. Other routes, such as State Routes 1, 17, and 25, serve a similar purpose of accommodating daily commuters and tourists to the region. East-west connectors such as State Route 46 and State Route 156 also provide access and throughput by completing gap closures, which is essential to help move goods and people safely.

Our region represents one of the most productive agricultural regions in the nation, if not the world. The Central Coast annually generates over \$50 billion in freight traffic. Fresh produce from the Salinas Valley cannot be delayed when processing or going to market. We have nearly 27 million registered drivers in this state, all of whom do not have the same travel destinations. The state's population has quadrupled since the highway system was built in the 1950s, which has exacerbated the challenge, particularly with 50% of all imports and exports in the nation moving through the Ports of Oakland and Los Angeles/Long Beach and utilizing the Central Coast's arterials to get goods to market. Our region also generates over \$5 billion annually from tourism, representing 40 percent of our local economy.



The CCC is supportive of improving vehicle miles traveled (VMT) analysis and mitigation guidance for rural projects to better account for the low VMT impact of many rural projects, which we hope will be the case with the enactment of SB 768 (Caballero), Chapter 773, Statutes of 2024. The Coalition, however, has concerns about updating the Trade Corridor Enhancement Program (TCEP) guidelines to impact the competitiveness of projects based on their VMT impacts. One size does not fit all in the State of California as small urban and rural regions lean on TCEP funding to help deliver critical freight and safety projects of regional and statewide significance. This change would be detrimental to areas like the Central Coast. While TCEP's statutory language clearly emphasizes that *freight emissions reductions* are the program's focus, this strategy would shift the focus of the program implementation to *passenger VMT mitigation* in contradiction of statute. Caltrans, CTC, and other state agencies have shifted their focus to VMT mitigation, but the statutory authorization for TCEP does not make that distinction and must continue to be implemented as a program focusing on freight emissions reduction.

Further, the CCC believes this strategy would give an undue advantage to urban ports, urban passenger VMT mitigation, and rail programs within the grant program at the detriment of other key highway freight corridor projects throughout the State. TCEP is one of the only state grant programs for freight corridor improvement and freight emissions reduction. Equitable competitiveness should be maintained for all statewide applicants.

The Coalition has similar concerns with updating the Solutions for Congested Corridors Program (SCCP) guidelines to impact the competitiveness of projects based on their VMT impacts. One size does not fit all in the State of California as small urban and rural regions lean on SCCP funding to help deliver critical multimodal corridor improvement projects of regional and statewide significance. Multimodal corridors aim to reduce VMT through a suite of improvements. When an applicant submits their SCCP applications, not all improvements in the suite are considered as they may be funded with other sources. Also, improvements may have different VMT results when not considered part of the complete suite.

Lack of density is an issue along the Central Coast. The San Francisco Bay Area has a population of 6.8 million over 7,300 square miles, Los Angeles County has 10 million people living over 4,700 square miles, the San Joaquin Valley has 4.3 million people spread out over 27,000 square miles, and the Central Coast has 1.5 million residents living over 18,000 square miles. The Bay Area has 4.5 times more people living in an area nearly one-third the size of the Coast. Los Angeles has more than 6.6 times the population in just a quarter of the area of the Central Coast.

The automobile represents the most viable access to educational, career, and recreational opportunities. It is often not feasible for Coastal residents to take public transportation or ride a bike to go to work or school or conduct daily activities, such as grocery shopping, taking children to soccer practice, or running other household errands. These realities make VMT reduction difficult in some cases. VMT reduction was not intended for rural or suburban areas.

Our region is putting maximum effort into providing multimodal options, and we are appreciative of awards received from the Active Transportation Program, Transit and Intercity Rail Capital Program, and the SB 1 competitive programs, which feature many multimodal components.

Our solution would be to create more funding opportunities rather than poach from existing resources to accelerate multi-modal objectives. Examples include increasing grant opportunities



for zero-emission vehicles and infrastructure, recapturing truck weight fees, extending the Cap and Trade Program, and finding a successor source to the gas tax to stabilize funding.

Strategy 3: Delivering Equitable Outcomes

We fully support public outreach and inclusion of all communities to ensure that we are servicing the needs of our regional communities.

Strategy 4: Improving Transparency and Accountability

The Central Coast has four self-help counties with detailed multi-modal expenditure plans, of which some resources are dedicated to improving state assets, such as the highway system. We have a fiduciary responsibility to execute those plans and do not support the codification of the CAPTI principles since it would make our region less competitive to acquire state funding to leverage local and federal dollars to improve safety and throughput for our region.

We fully support engaging with all constituencies to ensure that our investments enhance safety and mobility for all.

Thank you for the opportunity to comment. We look forward to working with you.

Sincerely,

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Central Coast Coalition

Moving California's Economy

Cc:

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30 October 2024

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Re: ClimatePlan Coalition Comments on the Climate Action Plan for Transportation Infrastructure (CAPTI) Action Plan Update

Dear CTC Commissioners, CARB Board Members, and HCD Director Gustavo Velasquez,

Thank you for the opportunity to provide feedback on the update to the CAPTI Action Plan. On behalf of the undersigned organizations, we're pleased to share the following comments.

Our organizations welcomed Governor Newsom signing Executive Order N-19-19 to align our transportation investments with our climate goals. Our organizations have worked hard to help realize that work in partnership with CalSTA, CTC, and partner agencies through our policy analysis and advocacy, and through legislative actions. We are grateful to Governor Newsom for signing AB 2086 and SB 960, which will further build on this foundation.

We also have observed that the first wave of work under CAPTI has led to an improvement in the quality of the projects being selected regarding their climate alignment, i.e. more investment in transit, active transportation and electrification, and less in highway capacity expansion. This has delivered benefits to climate, air quality and equity, and we are very grateful to see the CalSTA-commissioned analysis from the Mineta Transportation Institute showing that these investments have maintained a high level of quality job creation.

We strongly support updating the CAPTI Action Plan to build on the progress achieved so far and identify new priority activities. This next wave of policy action under CAPTI presents the opportunity to close the remaining gap between our climate goals and our investments, so our state can make an all-in commitment to clean transportation. We support the proposed actions in the draft CAPTI Action Plan Update referenced in the September 2024 CAPTI [workshops presentation](#), and recommend strengthening them in the following areas.

Strategy 1: Transforming the Future of the State Highway System

We support the use of pricing in an equitable manner to prioritize high occupancy vehicles and transit and improve the efficiency of the highways system, but we urge that **investments focus on converting general purpose and HOV lanes to express lanes and not continue to expand the highway system by adding new lanes**. According to available research, a newly-built managed lane project has the same induced VMT impacts as building a general-purpose lane¹. In fact, in some cases, the VMT impact can be higher for new managed lanes as they experience less congestion. The construction cost of lane conversion is lower than the capital cost for newly constructed HOT/toll lanes, so there will be more "excess" toll revenue available to invest in sustainable modes. We recommend that all funding generated by priced managed lanes be spent on improving mobility choices such as biking, walking, transit capital projects and transit operations (including service increases, reliability improvements and fare discounts) in the communities adjacent to the corridor.

In addition, we were thrilled that Governor Newsom signed SB 960 into law this year and acknowledged that implementation of complete streets and transit priority on the state highway system is a critical priority. We urge CalSTA, CTC, and Caltrans to accelerate implementation of key provisions of SB 960 in line with several of the new actions proposed in the CAPTI Action Plan Update, specifically:

¹ Manville, M. (2024) Induced Travel Estimation Revisited *UCLA Institute of Transportation Studies*
<https://escholarship.org/uc/item/8m98c8j1>

- Adopt a transit priority Director’s policy as soon as possible and **identify priority locations to implement transit priority infrastructure on the state highway system** to enhance the frequency of service and increase ridership, and
- **Set spending goals for bike, pedestrian, and transit infrastructure relative to the level of mode shift that must be achieved to reach CARB Scoping Plan targets** for reduction of vehicle-miles traveled (VMT).

Strategy 2: Reducing Greenhouse Gas Impacts of Transportation Investments

We strongly support making projects that mitigate their passenger VMT impacts more competitive for Trade Corridor Enhancement Program (TCEP) funding, and recommend that TCEP guidelines be clear in requiring that the same measure for truck VMT be consistently used to support claims for truck throughput as well as air quality impacts.

TCEP continues to be the transportation program that funds the most VMT-increasing projects as demonstrated by the Mineta Transportation Institute study, and we have serious concerns about how agencies cherry-pick certain sets of modeling data to inflate claims of goods movement benefits, while use other conflicting data sets to downplay air pollution impacts. Diesel trucks are the largest mobile source of criteria air pollutant emissions², and pollutant emissions from freight have increased more than 50% since 1990 due to increased freight traffic³. By encouraging passenger VMT mitigation and clearer standards for accounting of benefits and impacts, the TCEP program will be able to better identify projects that support cleaner and more efficient goods movement and increase transparency to the public regarding the benefits of those projects.

In addition, we **strongly support the requirement that projects funded by the Solutions for Congested Corridors Program (SCCP) must have a VMT-neutral impact and urge that this requirement be applied to the impacts of individual projects instead of the entire program.** Despite the SCCP’s goal to reduce congestion, this program still results in significant increases in VMT which will ultimately worsen traffic congestion. Requiring that all funded projects reduce VMT or be VMT-neutral would ensure SCCP is effectively reducing congestion over the long term, while also reducing greenhouse gas and air pollution emissions.

Strategy 3: Delivering Equitable Outcomes

We strongly support the action to establish a Director’s Policy to avoid direct displacement of homes due to highway expansion projects, and **we urge Caltrans to not just reduce but to entirely avoid the takings of both homes and businesses in disadvantaged communities for highway expansion.** Highway expansions increase pollution, traffic safety risks, and noise, as well as cause both direct and indirect displacement in communities already most burdened by environmental injustices and by our state’s housing crisis. Beyond the direct physical displacement of homes and businesses from new or expanded infrastructure, transportation

² *California Air Resources Board* (2020) California takes bold step to reduce truck pollution <https://ww2.arb.ca.gov/news/california-takes-bold-step-reduce-truck-pollution>

³ *U.S. Department of Transportation* (2015) Clean Freight <https://www.transportation.gov/mission/health/clean-freight>

investments of all types could risk increasing rents and pushing vulnerable residents out of their communities. We recommend that CalSTA also consider a policy to mitigate indirect displacement impacts of transportation investments with strategies to preserve and augment affordable housing and commercial space in proximity to those investments.

Strategy 4: Improving Transparency and Accountability

We were also thrilled that Governor Newsom signed AB 2086 this year, requiring an updated data dashboard and transparency for the public on the beneficial outcomes from CAPTI programs. We strongly support the new actions proposed in the CAPTI Action Plan Update on increasing transparency and accountability on projects underway as well as the outcomes of state investments. As advocates, we rely on transparent data and accountability processes to monitor and push forward the state's progress toward climate and equity goals.

Thank you for your consideration. Please contact Jeanie Ward-Waller on behalf of ClimatePlan (jeanie@fearlessadvocacy.com) with any questions.

Sincerely,

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