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May 19, 2021

Mr. David S. Kim
Secretary
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

Subject: Climate Action Plan for Transportation Infrastructure

Dear Secretary Kim:

On behalf of the Southern California Association of Governments (SCAG), we want to thank you for the opportunity to comment on the Climate Action Plan for Transportation Infrastructure (CAPTI). This document represents a significant opportunity to align the State's transportation investments with the goals for reducing greenhouse gas emissions (GHG) and providing for a more equitable future. In the interest of having a strong and successful action plan, we offer the following suggestions based on over a decade of sustainable regional transportation planning in Southern California.

First, it is important to point out that the guiding principles articulated for the CAPTI largely reflect the strategies, investments and goals of Connect SoCal, SCAG's recently adopted 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Connect SoCal is a product of our continued efforts to align transportation investments across six counties and 191 cities to reduce GHG and improve air quality, while also meeting the mobility needs of a growing population and economy. Rooted in the 2008 RTP and 2012 RTP/SCS plans, Connect SoCal's "core vision" centers on maintaining and better managing the transportation network we have, while expanding mobility choices by locating housing, jobs and transit closer together and increasing investment in transit and complete streets.

This core vision enabled the SCAG region to achieve its 2020 greenhouse gas reduction target yielding the changes envisioned under SB 375, including a significant change in the projects our regional partners fund through local sales tax measures. The State's ongoing partnership, including the financial support for the Active Transportation Program and Senate Bill (SB) 1 programs, has also been essential to moving this core vision forward. In the last five years alone, more than 500 bikeway miles have been added to the region's active transportation network. The

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transit backbone has been expanded to include the Metro Gold Line Foothill Extension in Los Angeles County and the Downtown San Bernardino Passenger Rail Project in San Bernardino County. Major strides were made in establishing a regional express lane network with the addition of the I-10 and I-110 Express Lanes in Los Angeles County and the expansion of the SR-91 Express Lanes between Orange and Riverside Counties. Complementary land-use changes, which have been supported through SCAG's Sustainable Communities Program, contributed to continued progress toward more compact development patterns as envisioned in our plan. Since Senate Bill 375 passed in 2008, nearly 60 percent of new household growth have occurred in high quality transit areas.

To meet higher GHG reduction targets, Connect SoCal expands upon this core vision to explore new strategies enabled through advancements in technology. Referred to as our "key connections," these new strategies account for thirty percent of the reductions needed to achieve our 2035 target. They include creating "smart cities" where virtual access reduces the need to travel for work and services; optimizing "mobility as a service" through better management of curb space and public right-of-way to encourage shared mobility; deploying next generation commute reduction strategies in job centers; leveraging parking policies and infrastructure investments to stimulate housing production in priority growth areas; and accelerating electrification and clean mobility through incentives and infrastructure. Beyond helping achieve our SB 375 GHG reduction targets, which focus on reductions from passenger vehicles, many of the key connections also address criteria pollutant emissions from goods movement sources that account for more than half of all mobile source emissions in the SCAG region.

As the evolution of our regional planning demonstrates, meeting the challenges of climate change requires a broad set of interconnected strategies to reduce greenhouse gas emissions. To achieve this level of connectivity in a rapidly changing mobility landscape, the development and implementation of local and regional plans has never been more critical. Our networks and operating systems must become more granular to facilitate seamless transitions at the curb, not just the on-ramp. Land-use plans must align with transportation networks at the neighborhood scale to make walking or rolling the easiest way to start every trip. While CAPTI recognizes that state transportation goals require local action, the emphasis of the plan on state-wide tools and metrics to inform project-level decisions ignores the local context and will require close coordination with regional agencies to ensure state efforts support, rather than constrain, local and regional plans. The State rightfully established a system under SB 375 of achieving greenhouse gas reductions that is bottom-up, not top-down, where state-established, regional performance metrics drive regional planning organizations to find innovative solutions that can be implemented in the context of California's diverse communities. For this model to be successful, regions need certainty that the State will be a funding partner in delivering innovative solutions and plans. The development of CAPTI provides this opportunity, though more time and a stronger engagement process is needed to ensure a successful outcome.

We offer the following overarching recommendations, followed by specific comments, to strengthen the alignment between CAPTI and regional plans with the aim of not only supporting

the implementation of Connect SoCal but also accelerating the implementation of strategies to achieve reductions sooner.

- **Recognize and support projects that restore and sustain transit as the backbone of sustainable mobility:** Transit serves as the backbone of Connect SoCal, a key strategy for meeting the region’s mobility and sustainability goals, supporting existing and future transit-oriented communities and providing a lifeline service to our most vulnerable populations. The COVID-19 pandemic has both amplified existing trends in ridership decline and brought new challenges. While CAPTI includes key transit-supportive actions including the California Integrated Travel Project and funding to help transit operators meet the State’s Innovative Clean Transit mandate for zero emission fleets, more must be done to support transit recovery and revitalization. CAPTI acknowledges that frequent, reliable and convenient transit systems are vital for advancing more livable and equitable communities. With nearly 80 percent of every transit trip in the SCAG region carried on buses, support and investment in road infrastructure and technology that prioritize transit—such as adding dedicated bus lanes and managed lanes—is critical
- **Expand—don’t limit—funding eligibility for systemic change and impact:** Our region is concerned that fixating on VMT analysis at the project level, as a proxy for GHG reduction, undermines long-term mitigation and runs counter to the State’s goals of advancing sustainable solutions that balance mobility, safety, economic and equity goals. When SCAG prepares the RTP/SCS, we balance these multiple goals alongside our GHG reduction targets. We encourage the CAPTI to take a similarly balanced approach and to respect the plans, programs and projects in the RTP/SCS that collectively support our regional goals, objectives and GHG target achievement. More specifically, the issue of “advancing the SCS” as mentioned in Strategy 6.3 runs counter to our understanding of the RTP/SCS as an integrated regional plan.. This strategy could result in the deprioritizing of projects, like our express lane network, that enjoy regional consensus and are critical to transit and pricing strategies that drive emission reductions in our plan.

SCAG would welcome more conversation and focus on opportunities to expand funding eligibility for more innovative solutions, like our “key connections.” A guiding principle of CAPTI is to promote projects that do not significantly increase passenger vehicle travel, including the use of technology to optimize operations. Yet, none of the CAPTI strategies truly address technology, aside from clean vehicles. Connect SoCal includes transportation systems management (TSM) and transportation demand management (TDM) strategies that use existing and innovative technology to achieve cost-effective mobility and sustainability benefits. SCAG is investing over \$2 million in planning and pilot development for curb space management over the next few years, and there are many examples of pilot demonstrations across the State that show the potential benefits of innovative new transportation options. CAPTI should more explicitly support technology and innovation, including as eligible components of capital projects. There is perhaps no clearer linkage between transportation infrastructure, technology, and GHG reduction

than in broadband deployment. Dig once/dig smart investments in broadband are critical not only to prepare us for an increasingly connected future, but also to ensure that all Californians benefit from new technologies that improve digital access to education, health care and employment, while reducing the need for travel.

- ***Plan for Transition:*** For more than a decade the State has required regions to develop plans to meet greenhouse gas reduction targets. To achieve even greater reductions from transportation, the region supports and is encouraged by efforts to put more resources into regional and local planning and pilot programs. We will go further together by doing the hard work of engaging communities to find solutions. To this end, we support efforts like the “Highways to Boulevards” Conversion Pilot Program, both in terms of the vision and the piloting process proposed to advance this strategy. SCAG is currently seeking federal funding to pursue a similar project to conduct a regional assessment to address longstanding inequities in environmental justice areas, disadvantaged communities and communities of concern. We also strongly support the emphasis of CAPTI on equity and on community engagement as foundational to achieving more equitable outcomes. SCAG’s governing board, the Regional Council, recently adopted resolutions on equity¹ and resilience² to highlight the importance of meaningfully advancing justice, equity, diversity, and inclusion and commit to promoting regional climate adaptation, mitigation, and decarbonization in the transportation realm. SCAG endeavors to improve our RTP/SCS development and implementation by elevating community voices. Our Go Human program focuses on making changes at the neighborhood-level, to promote safe streets and healthy communities. These highly local conversations lead to local plans, and then percolate into county plans and regional plans, which result in projects that are put forward to the State for funding. We are encouraged by the State’s efforts to improve community engagement and conversations and look forward to resources flowing to the local level for meaningful engagement and community-driven change.
- ***No one-size-fits-all:*** We greatly appreciate that the draft CAPTI recognizes the principle of “no one-size-fits-all” (page 15, first paragraph). How that principle is operationalized is of great interest to SCAG and our partners, given the size, geographic diversity, and economic diversity of our region and the diversity of our residents and businesses across the region. While the region is largely considered to be urbanized, well over half the region, by land area, is rural. There is also a great deal of diversity even within the urbanized portions, based on historical land use patterns and environment. Our request would be that the state recognize the wide range of needs and varying degrees of ability to achieve VMT reduction. We would request additional acknowledgement of this point in the final CAPTI document.

To advance these priorities, we offer the following recommendations to strengthen CAPTI:

¹ https://scag.ca.gov/sites/main/files/file-attachments/rcresolution206232_0.pdf?1605039926

² <https://scag.ca.gov/sites/main/files/file-attachments/rc010721resolution21-628-1.pdf?1610072923>

- Strategy 1.1 Prioritize Solutions for Congested Corridors Program (SCCP) Projects:** Updating the Solutions for Congested Corridors Program (SCCP) guidelines to prioritize projects that enable travelers to opt out of congestion is a praise-worthy goal. It highlights the importance of critical regional initiatives, such as express lanes, designed to improve travel times and reduce congestion, while generating revenues for reinvestment in the corridor. CAPTI, however, over-emphasizes VMT reduction as the primary metric, potentially impacting the funding and completion of many critical regional express lane projects that serve bus rapid transit and offer travelers important mobility choices.
- Strategy 1.4 Mainstream Zero-Emission Vehicle Infrastructure within the Trade Corridor Enhancement Program (TCEP):** With the Trade Corridor Enhancement Program guidelines development, it should be recognized that many of the near-term ZEV infrastructure projects will be private sector led initiatives—on private property. Currently the freight industry functions with minimal state funding. Public infrastructure buildout will require significant planning to better understand where the opportunities are and demand is on public rights-of-way and it will need to explore the potential for public-private-partnerships. Although the CAPTI proposal acknowledges that it is limited to the funding programs overseen by CalSTA, a zero-emission fueling/charging network developed and adopted by CalSTA and the CTC should be coordinated, in a transparent way, with funding decisions made by CARB and the CEC. Accordingly, the CTC should recognize regions like Southern California that proactively plan and develop blueprints for ZEV infrastructure. Similarly, Strategy 4.6 should take into account efforts at the regional level. Partnering with California’s ports on identifying a zero-emission freight network would further recognize the critical role of freight to the state’s economy and access to essential goods.
- Strategy 2.2 Identify A Long-Term Strategic Funding Pathway Across All Funding Opportunities to Realize the State Rail Plan:** In building from the State Rail Plan to prioritize statewide transit and intercity rail investments, it will be important to use a context sensitive evaluation to equally support the diverse range of communities across the State. In addition to the need for infrastructure investments, CAPTI must consider the funding needs of transit agencies and work to identify reliable support for their ongoing, operations and maintenance.
- Strategy 2.4 Increase Funding to Active Transportation Program (ATP):** We support the proposal to increase funding to the Active Transportation Program for high performing projects. Despite recent investments into the program, including \$100 million annually from SB 1, the ATP is significantly oversubscribed.
- Strategy 3.1 Elevate Community Voices:** We encourage the California Transportation Commission (CTC) and Caltrans to help state and local agencies pursue partnerships with community-based organizations (CBO) by identifying funding mechanisms to pay for CBO staff time. For example, SCAG leveraged Senate Bill 1 funding to compensate our CBO

partners for their time during our 2020 RTP/SCS outreach process. Similarly, one way to improve local public engagement is to offer childcare. Related to Strategy 3.1, we recommend that the CalSTA, Caltrans and the CTC fund the community representatives you find to participate in the panel and ensure representation from across the State.

- **Strategy 4 Advance State Transportation Leadership on Climate and Equity through Improved Planning & Project Partnerships:** Given the robust policy framework created under SB 375 to reduce greenhouse gas emissions and better align housing development with transportation investments, we strongly encourage reconsideration of strategies that add new VMT or GHG project-level targets or thresholds. This includes revisiting Strategies 4.1 Caltrans Strategic Investment Strategy and 4.5 Caltrans Climate Action Plan to consider whether these actions add value or would only serve to overly complicate the delivery of projects that have already been vetted as part of a sustainable transportation strategy for a region. We believe Strategy 4.4 is a far more productive approach to advance state leadership and look forward to partnering with Caltrans to develop a strong pipeline of innovative sustainable transportation solutions through better planning, particularly along conventional freeways that run through the heart of so many of our communities.
- **Strategy 6.2 Convene a Roadway Pricing Working Group to Provide State Support for Implementation of Local and Regional Efforts.** SCAG supports efforts to provide meaningful engagement opportunities and collaboration between the state and regional efforts. In the convening of a working group about roadway pricing, there needs to be a consideration of how roadway pricing may impact local toll collection. We are concerned about the state inhibiting or impeding toll pricing activities established by local independent authorities, like those in the SCAG region. Doing so could jeopardize the financial stability of a regional tolling operator. Additionally, local agencies that manage these programs should retain local authority to make operational decisions.
- **Strategy 6.3 Develop Interagency Framework for Project Evaluation Around Advancing Sustainable Communities.** This strategy runs counter to our understanding of the RTP/SCS as an integrated regional plan. SCAG is concerned that state efforts at prioritization of projects within an RTP/SCS could lead to increased project costs and delays. SCAG would welcome the opportunity to work with CalSTA and other key state partners on this effort.
- **Strategy 7.3 Explore a “Highways to Boulevards” Conversion Pilot Program:** SCAG supports the “Highways to Boulevards” Conversion Pilot Program, as mentioned previously, and is currently seeking “Member Designated Project” funding at the federal level to conduct a comprehensive study on this topic in our region. SCAG suggests that CTC consider the incorporation of transit and active transportation modes for these projects, where feasible.

- **Additional Strategies:** In addition to the discussion of zero emission vehicle (ZEV) freight and transit fleets outlined in the strategies, the CAPTI should work to address ZEV barriers at the consumer level, particularly regarding ZEV charging permit streamlining (consistent with AB 1236) and tools for accelerated ZEV adoption for consumers. This would be consistent with supporting and ensuring the success of Executive Order N-79-20. Please also consider how the State can identify, encourage and support synergies between zero emission freight and zero emission transit investments. Similar to the comment made above for strategy 2.2, SCAG would welcome the state’s leadership in identifying funding sources for long term transit operating funds for all transit, not just rail. Supporting capital investments or leveraging existing infrastructure through expanded or more frequent service in order to achieve reductions in VMT and GHGs is dependent on transit agencies having sufficient and sustainable operating funds.

In conclusion, SCAG and our partner agencies support the vision and principles reflected in CAPTI as consistent with the goals and strategies of our own regional plans, but want to ensure that the resources directed by the State live up to these stated principles. Thank you for working in a collaborative manner that is respectful of the varying starting points of cities and counties across the State, including those in Southern California. If you have any questions or require additional information on any of the ideas discussed above, please do not hesitate to contact me directly, or Ms. Sarah Dominguez, Sustainable Communities Strategy Program Manager, at dominguezs@scag.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kome Ajise". The signature is written in a cursive, flowing style.

Kome Ajise
Executive Director