

May 19, 2021

David Kim, Secretary  
California State Transportation Agency  
915 Capital Mall, Suite 350B  
Sacramento, CA 95814

**RE: Climate Action Plan for Transportation Infrastructure**

Secretary Kim:

On behalf of the California Transit Association, I write to you today to comment on the Newsom Administration's Climate Action Plan for Transportation Infrastructure (CAPTI). CAPTI is a transformational policy document that appropriately elevates mass transportation as a central strategy for reducing transportation sector emissions and combatting climate change. CAPTI recognizes an important truth: to meet our state's greenhouse gas emission reduction goals, we must reduce emissions from vehicles, by transitioning to zero-emission technologies, and incite mode shift to clean mobility options.

We greatly appreciate that, throughout the development of CAPTI, the Administration afforded industry stakeholders, like the Association and its members, numerous opportunities for learning about the plan and for engaging with key state officials on its details. We also thank the Administration for proposing in the May Revision significant new investments in transit and rail systems as well as in active transportation to jumpstart progress toward the objectives of CAPTI. These proposed investments align closely with the Association's budget priorities, as communicated to the Administration and the Legislature in [our May 11 letter](#) and help ensure that various programs that support transit and rail systems can continue to fulfill their primary objectives even as they further a series of new objectives outlined in CAPTI.

We look forward to supporting the Administration's proposed investments in transit and rail as they are reviewed in the Legislature.

In the comments that follow, we respond to the CAPTI strategies impacting transit and rail programs.

**S1.1 Prioritize Solutions for Congested Corridors Program (SCCP) Projects that Enable Travelers to Opt Out of Congestion**

As the California Transportation Commission works toward updating the Solution for Congested Corridors Program (SCCP) guidelines and scoring criteria to fund projects that enable travelers to opt out of congestion, the Association underscores the importance of transit and rail projects that reduce vehicle miles traveled as well as highway solutions that improve transit travel times.

In addition to the clear benefits of investing in transit and rail projects, we want to acknowledge that one highway solution that benefits transit travel times and reliability and that generates revenue for transit operations is the express lane, which can *on balance* increase VMT. It is vital that such a solution continues to be eligible for funding from the SCCP and remain competitive in the program's project scoring.

Additionally, we would note that the Association has consistently advocated to expand authorization to operate buses on highway shoulders, a solution we assert is consistent with the spirit of this strategy. This solution, which would require project sponsors to make physical improvements to the highway shoulder and to pay for signage to ensure the safety of operations, reduces transit travel times and improves customer satisfaction. As such, it should be supported by the Administration and made eligible for funding from the SCCP.

### **S2.1 Implement the California Integrated Travel Project (Cal-ITP)**

The Association supports incentives and technical assistance to facilitate the adoption of contactless fare payment systems by transit agencies statewide while also recognizing the critical role that Cal-ITP will play in reducing the costs of these systems for many transit agencies. As Cal-ITP is implemented, we would encourage the Administration to ensure that the project remains elective, as presented in this strategy, allowing interested transit agencies to opt into Cal-ITP, while also permitting transit agencies to maintain regional fare payment systems, if preferred.

### **S2.2 Identify A Long-Term Strategic Funding Pathway Across All Funding Opportunities to Realize the State Rail Plan**

The Association supports the Administration's vision for a unified statewide rail network that better integrates passenger and freight service and that connects passenger rail to other transportation modes. To deliver on this vision, we know the state's rail agencies require significant new funding to implement track improvements, grade separations and advanced signaling systems, and to transition to zero-emission technologies, among other things. We, therefore, support the Administration's efforts to increase funding for rail systems and encourage the Administration to ensure that this funding benefits intercity passenger rail and commuter rail systems. As new funding is secured, we believe it should flow to rail systems directly, so they can advance their shared goals with the state.

### **S2.3 Accelerate TIRCP Cycles to Support Transit Recovery with Deployment of ZEV Transit/Rail Fleets and Transit/Rail Network Improvements**

The Association supports the transition of bus and rail fleets statewide to zero-emission technologies. As California transit and rail agencies incorporate these technologies into their fleets, they have consistently articulated to state and federal officials that the dominant barrier to a more aggressive transition has been the high costs of zero-emission vehicles and infrastructure. We, therefore, support the state's efforts to revamp the Transit and Intercity Rail Capital program to increase its support for zero-emission vehicle purchases and infrastructure buildout for bus and rail.

However, as the focus of this funding expands and demand for the program increases, so too, should its annual funding level. We support the Administration's efforts to increase funding for TIRCP to make progress on our ambitious zero-emission vehicle deployment goals, while ensuring that the program's expanded focus on fleet technologies does not disadvantage transformational capacity-focused rail projects. Additionally, as the state has already approved a

multi-year programs of projects, we urge the state to ensure that implementation of this strategy does not disrupt the flow of funding for projects that have already been approved.

#### **S2.4 Increase Funding to Active Transportation Program (ATP)**

The Association supports continued investment in the Active Transportation Program; however, the various programs identified in this strategy for potential redirection to the ATP are all underfunded relative to their statutorily directed programmatic objectives. We would, therefore, encourage the Administration to continue to pursue new funding to support the ATP.

#### **S5.1 Update Transportation Infrastructure Competitive Program Guidelines to Incentivize Climate Adaptation and Climate Risk Assessments/Strategies**

The Association recognizes the threat that climate change has on transit and rail projects and we support the Administration's goals to reduce the risk to these projects. With that said, we believe that the Administration's proposed approach to accounting for climate risk in project applications is too narrow.

Today, due to significant disparities in funding and expertise, project sponsors vary greatly in their ability to conduct climate risk assessments of projects. Before the state requires climate risk to be considered in project scoring in competitive programs, it must first ensure that all project sponsors have the resources necessary to adequately conduct this work. We would also encourage the Administration to expand their approach to internalizing risk in project applications by authorizing project sponsors to include supplemental materials alongside their project applications that address more expansive local or regional efforts, designed to ensure the resiliency of their project.

#### **S6.1 Explore New Mechanisms to Mitigate Increases in Vehicle Miles Travelled (VMT) from Transportation Projects**

The Association supports the Administration's efforts to mitigate increases in VMT from transportation projects, specifically through investment in transit and rail projects. As this effort moves forward, we would encourage the Administration to ensure that the creation of project-specific mitigation banks is controlled by local- or regional-entities and used for investment in projects in their jurisdictions.

#### **S6.2 Convene a Roadway Pricing Working Group to Provide State Support for Implementation of Local and Regional Efforts**

The Association views roadway pricing as a key strategy for reducing vehicle miles traveled and inducing mode shift to alternative modes of transportation, like transit and rail. As such, we support the Administration's efforts to support the authorization and implementation of these programs at the local- and regional-level. As these programs advance, we believe that is vital that the sponsoring local- and/or regional-entity retain control over program design, including pricing structure and use of revenues. These entities, which are closest to the communities impacted by these programs, can help mitigate unintended impacts and further investments that advance equity and that work within a local- or regional-context.

#### **S7.1 Leverage Transportation Investments to Incentivize Infill Housing Production**

To facilitate infill housing production, the state should provide new funding to incentivize its production. The state should not, however, predicate investments in transportation on localities adopting pro-housing policies or create new scoring criteria or mandates impacting transit and rail projects. To the extent that such policy is pursued, impacting competitive programs benefiting transit and rail, we believe it creates a new conflict between localities and transit and

rail agencies that ultimately undermines local support for sustainable transportation investments.

Thank you for the opportunity to review and comment on this document. We look forward to working with the Administration in the years ahead to continue to strengthen and build our public transit and rail networks. If you have any questions about the comments provided in this letter, please contact me at 916-446-4656 x1034 or at [michael@caltransit.org](mailto:michael@caltransit.org).

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael Pimentel".

Michael Pimentel  
Executive Director

cc: Darwin Moosavi, Deputy Secretary for Environmental Policy and Housing Coordination,  
California State Transportation Agency  
Chad Edison, Chief Deputy Secretary for Rail and Transit,  
California State Transportation Agency  
Members, California Transit Association