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May 19, 2021

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David Kim, Secretary
California State Transportation Agency (CalSTA)
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Attn: Darwin Moosavi, Deputy Secretary, Environmental Policy and Housing Coordination

RE: CAPTI Comment Letter

Dear Secretary Kim:

Thank you for the opportunity to comment on CalSTA's Climate Action Plan for Transportation Infrastructure (CAPTI) draft. MTC staff commend CalSTA for taking a proactive response to addressing climate change and Governor Newsom's executive orders (EO N-19-19 and EO N-79-20) in the CAPTI principles, strategies and actions outlined in the document. MTC staff have appreciated the various opportunities to provide input on the document throughout its development.

Many of the CAPTI principles and corresponding strategies and actions are aligned with the principles, strategies and investments identified in the Final Blueprint of Plan Bay Area 2050, the Bay Area's Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) due for adoption in the fall of 2021. We express strong support for the attention given to equity in CAPTI, and encourage CalSTA to prioritize strategies and actions that advance equity in CAPTI implementation.

As noted, many CAPTI principles align with Plan Bay Area 2050. In particular, the CAPTI principles related to building toward an integrated statewide rail and transit network, investing in active transportation infrastructure, investing in zero-emission vehicle infrastructure, supporting low vehicle-miles-traveled VMT projects, strengthening commitments to social and racial equity, promoting compact infill development without displacement, advancing safety, assessing the physical risk to transportation infrastructure and protecting natural and working lands are all directly consistent with Plan Bay Area 2050's strategies to achieve a more resilient and equitable region.

MTC offers the following comments on the draft CAPTI, listed below.

Strategy 1.1 and Strategy 6.2. Solutions for Congested Corridors and Express Lanes

The Bay Area's Regional Express Lane Network aims to combat congestion and reduce greenhouse gas emissions by providing reliable travel times for carpools, vanpools and buses. Completion of the Bay Area's express lane network will require the conversion of existing HOV lanes, as well as gap closures, some of which will likely require the conversion of general purpose lanes to express lanes. Such conversion will be both politically challenging as well as require statutory changes at the state and federal levels. In some cases, gap closures may require the construction of a new lane. While this new capacity could result in additional VMT when looked at in isolation, the region encourages CalSTA to ensure that new roadway capacity for express lanes remains eligible for state competitive funds since the increased VMT can be mitigated by tolling, express buses, and other activities that reduce GHG/VMT. MTC would welcome the opportunity to participate in the Roadway Pricing Working Group outlined in strategy 6.2, and supports changing current law to allow for conversion of a general-purpose lane to an express lane.

In addition to supporting the build out of the Bay Area's Express Lanes Network, we encourage CalSTA to partner with Caltrans, as the owner and operator of the State Highway System, and work with regions to improve the performance of the HOV network in order to provide greater time savings to bus transit and other HOV modes. This idea is briefly referenced in the document in Strategy S.1.1 in relation to the Solutions for Congested Corridors Program, but we encourage CalSTA to approach this more expansively. Significant progress towards improving the reliability of bus and HOV travel could be made not just through how the state prioritizes funds under its control, but also in how it directs Caltrans to actively support regions and transit agencies when they reach out to propose ideas to prioritize transit on the state highway system with local and/or regionally-controlled funds. This could include considering requests for design-exceptions in a timely manner, dedicating a lane to transit only, or supporting ideas that do not yet have broad statutory authorization, such as bus-on-shoulder, as proposed by AB 474 (Mullin).

Strategy 1.4. Support Additional Improvements at Port Facilities

MTC supports the proposed action under Strategy 1.4 to mainstream zero-emission infrastructure within the Trade Corridor Enhancement Program (TCEP program). The state's ports are the gateways to international commerce, and transitioning vehicles and infrastructure to zero-emissions is a key component to economic competitiveness while minimizing negative impacts to surrounding community. CAPTI should also include a goal to standardize the various zero-emissions and charging technologies for medium and heavy-duty vehicles. Ports may be reluctant to invest heavily in one technology for fear of it becoming obsolete in the future.

Strategy 2. Continue to Support Large Transformative Transit Projects in TIRCP

The draft CAPTI mentions various actions to promote transit and active transportation, specifically naming zero-emissions vehicles and infrastructure as a focus area for future TIRCP funding. TIRCP is a critical funding source that has helped close the funding gap in major transit capital projects including BART to Silicon Valley and fleet expansions for AC Transit, Caltrain (Electric Multiple Units), and SFMTA. We support additional state investment in zero-emissions technology but encourage the state to continue to use the TIRCP to help deliver additional large, transformative transit projects that will reduce VMT and GHG. MTC encourages CalSTA to

include language in CAPTI to support these types of transit investments from TIRCP in addition to zero-emissions technology identified in Strategy 2.3.

Strategy 3.4. Seek Input from Other Stakeholders in Developing Equity Index

MTC supports the development of an equity index tool to assess the equity impact of Caltrans projects. The strategy states that Caltrans will seek input from other state agencies in developing the Index, but does not mention plans to collaborate with regional and local partners. MTC and many other regional transportation planning agencies have been incorporating an equity focus into our planning and project evaluation approaches for several years, including MTC's Plan Bay Area 2050 Project Performance Assessment. We encourage CalSTA to invite regional and local agencies to participate in the development of this tool so we can share our best practices and lessons learned. Additionally, since many Caltrans projects are co-sponsored by and co-funded with regional and local agencies, we have a strong interest in the development of the Index. Finally, while the intent may be for the Index to be used solely for Caltrans projects, it has the potential to be used for other, non-Caltrans projects in the future so regional and local agency feedback on the Index is essential to develop a tool that garners broad acceptance and accurately represents the varied circumstances facing California residents across our vast state.

Strategy 5.2. Ensure Climate Risk / Resiliency Projects are Eligible and Prioritized for Funding.

MTC appreciates the need to produce and update studies on transportation assets vulnerable to climate change. CAPTI should go a step further to ensure projects that mitigate these climate risks are eligible and prioritized for funding, especially in programs managed by Caltrans including the SHOPP and ITIP. Resiliency projects - sea walls and moving highway alignments - or projects with significant resiliency or sea level rise improvement components such as SR 37, are generally difficult to fund since they are competing against other statewide priorities.

Strategies 5.3 and 6.1. Maintain State Support for Advance Mitigation Programs.

Strategy 5.3 encourages incentivizing land conservation through transportation programs, while Strategy 6.1 promotes exploration of VMT mitigation. Both strategies can be partially achieved through advance mitigation programs. SB1 provides \$120 million to Caltrans to develop a statewide Advance Mitigation Program for environmental resources, while development of an Advance Mitigation Program for VMT is still being studied through planning grants to the Southern California Association of Governments (SCAG) and the Contra Costa Transportation Authority (CCTA). The CAPTI should recognize these Advance Mitigation Programs as ways to achieve the outcomes in strategies 5.3 and 6.1.

Strategy 6.3 Development of an Interagency Framework for Determining Whether a Project Advances Climate Goals

We appreciate that the CAPTI highlights the absence of a clear framework to determine whether a project is consistent with a sustainable communities strategy (i.e., "the goals of SB 375") and the California Air Resources Board (CARB)'s scoping plan. This likely needs clarification through legislation and it appears the Legislature has an interest in revisiting SB 375 in 2022 given the introduction of SB 475 (Cortese) and SB 261 (Allen), which are both two-year bills. We would welcome the opportunity to participate in a dialogue with CalSTA and other key state partners on this effort, such as through the CARB/Strategic Growth Council collaborative

process described in this strategy. We encourage the state to kick off this effort this summer to provide ample time for discussion prior to the commencement of the 2022 legislative session.

Strategy 7.1 Leverage Transportation Investments to Incentivize Affordable Housing

We support CalSTA identifying the opportunity it has to leverage transportation investments to encourage land use policies that are aligned with promoting transit usage and lower VMT. MTC has done this for years through how we program our federal funds through the One Bay Area Grant program. We would welcome the opportunity to share our lessons learned in the design of such programs. We have found that setting minimum standards, such as having an adopted housing element, or a complete streets policy, as a condition of funding is a very effective way to drive policy changes at the local level. For extra points to encourage agencies to go the “extra mile” we would encourage CalSTA to consider leveraging the work that the Department of Housing and Community Development is doing to develop criteria to determine whether or not a local jurisdiction is “pro-housing.”

Thank you again for the opportunity to provide feedback. We look forward to next steps on CAPTI, including its implementation over the coming months. Should you have any questions about our comments, please do not hesitate to contact Therese Trivedi at ttrivedi@bayareametro.gov.

Sincerely,



Therese W. McMillan
Executive Director

cc: Ms. Kate Gordon, Chair, Strategic Growth Council
Mr. Darwin Moosavi, Deputy Secretary, CalSTA
Mr. Toks Omishakin, Director, California Department of Transportation
Mr. Gustavo Velasquez, Director, California Department of Housing and Community Development
Mr. Mitch Weiss, Executive Director, California Transportation Commission