

*Letter sent via electronic mail*

**Member Agencies**

May 18, 2021

*City of Ceres*

Mr. David S. Kim

*City of Hughson*

Secretary

*City of Modesto*

California State Transportation Agency

915 Capitol Mall, Suite 350B

Sacramento, CA 95814

*City of Newman*

*City of Oakdale*

**RE: Stanislaus Council of Governments (StanCOG) Considerations on the Draft  
Climate Action Plan for Transportation Infrastructure (CAPTI)**

*City of Patterson*

Dear Secretary Kim:

*City of Riverbank*

*City of Turlock*

*City of Waterford*

*Stanislaus County*

Thank you for the opportunity to comment on the Draft CAPTI framework. We understand and appreciate Governor Newsom's goal to reduce greenhouse gas emissions (GHG) and vehicle miles traveled (VMT) and encourage additional investments in public transportation and active transportation projects. Stanislaus County resides in a non-attainment air district, and our constituents suffer most from the poor air quality that is predominantly caused by our geographic location of being in a valley and enduring wind patterns, which blow in pollution from the west trapping pollution in the bowl, along with the heavy presence of goods movement, high portion of disadvantaged communities, and super commuter traffic that exacerbates the problem. Stanislaus communities are among the most burdened with pollution, according to CalEnviroScreen 3.0, given that 61 of the 94 census tracts within the county are categorized as disadvantaged communities with 19 falling among the 95th percentile and above, meaning that only 5% of other census tracts in California are more vulnerable to and affected by multiple pollutants and poor economic conditions.

**Policy Board Chair**

Terrance P. Withrow

**Policy Board Vice-  
Chair**

Richard O'Brien

While StanCOG is in strong support of addressing climate change and appreciates your leadership on this issue, success will require creative, flexible, and pragmatic solutions to account for the unique opportunities and challenges that face each region.

**Executive Director**

Rosa De León Park

We are concerned that the CAPTI strategy may not support critical local highway safety and congestion relief improvements that may necessitate some highway capacity projects in order to accommodate emergency evacuation routes, heavy goods movement traffic,

transit travel times, and employees who are commuting to jobs in major urbanized areas, such as the Bay Area, Los Angeles Basin, and beyond. Given the San Joaquin Valley's unique geography, lack of density, vast agricultural farmland, and the jobs-housing imbalance, we must continue to accommodate all modes of travel even while we continue to work toward reducing GHG emissions.

Regional flexibility and regulatory relief for rail, bus and active transportation is imperative to supporting a balanced multi-modal transportation system that will meet our mutual goals of reducing greenhouse gas emissions, fatalities and injuries, and enhancing mobility. Our suggestions for balancing the need for lower levels of car use and more sustainable travel with the transport needs of those living in rural areas are as follows:

**1. Allow Flexibility in State Funding Programs to Address All Modes**

State funding programs should provide flexibility to regions so that they can address all modes efficiently as possible to maximize safety, mobility, goods movement, and throughput in order to expedite the response to climate change, especially on the state highway system. We request that CAPTI recognize smaller urban/rural areas that still need to plan, fund and deliver projects on the state highway system that address safety and congestion along lifeline routes such as Highways 99, 120, and 132.

The state must also consider areas where capacity expansion is necessary to address climate adaptation and resiliency or to close gaps on evacuation routes to prepare for natural disasters or other climate events. Highway 99 is the San Joaquin Valley's "main street" and serves as the main arterial for the region and is integral for interstate commerce. Enhancing access and throughput by completing gap closures is essential to help move goods and people in a safe manner.

Further, our area represents one of the most productive agricultural regions in the nation, if not the world. Fresh produce cannot be delayed when going to processing or to market. Investment in regional goods movement transportation corridors will remain a priority for our region, and heavy truck traffic is expected to increase, along with our region's population. This necessitates a more balanced planning approach, which supports sustainable economic development across all of California and recognizes the diversity and interconnectedness of all regions, including the San Joaquin Valley.

Rather than prioritizing non-capacity inducing projects on the state highway system, we request that state funding programs, particularly the SB 1 competitive programs: Local Partnership Program, Solutions for Congested Corridors, and Trade Corridor Enhancement Program, provide greater flexibility to address all modes, such as more funding for grade separations, passenger rail, and active transportation projects, so that state resources are flexible and are used as efficiently as possible to maximize safety, mobility, and throughput, in order to expedite the response to curbing climate change on and off of the state highway system.



Augmenting oversubscribed programs, such as the ActiveTransportation Program (ATP), would also help, but highway capacity must still be considered, particularly when it is the only option in some areas to address congestion and safety.

**2. Support Additional Strategies that Reduce Greenhouse Gas Emissions**

As noted above, our county fully supports investments in public transportation, but transit is not the universal answer to reduce greenhouse gas emissions. In FY 17-18, the Amtrak San Joaquins service carried more than 1.1 million passengers, and 1.5 million passengers boarded the Altamont Corridor Express, a total of 2.6 million passenger trips. Despite this success, this is a fraction of the total number of individual drivers; there are over 25 million registered drivers in this state, and it simply is not realistic or viable to expect that a significant shift to heavy investment in transit (or bike/ped) will be as effective in the Valley.

Transit is also expensive to build and operate and is not always a pragmatic or efficient solution for a constituency's daily mobility needs. This is because it typically lacks flexibility (traditional service is fixed service without options for route deviation and schedules), it can be unreliable, and is sometimes limited or non-existent in more remote unincorporated areas. Pre-pandemic, transit ridership levels declined in 31 metropolitan areas nationally. In fact, as of 2017, only 5 percent of all trips in densely populated regions, such as the San Francisco Bay Area, were made using transit. Per-capita transit ridership in the region decreased 12 percent between 1991 and 2016.

The widespread impact of the COVID-19 on public transportation has exacerbated this predicament due to the shelter in place order and social distancing protocols. Choice riders often utilize transportation network companies, leaving society's most vulnerable, such as seniors, school children, those on a fixed income and the physically challenged, to cover the cost of operating expenses. Grocery shopping or taking children to soccer practice is not ideal when waiting for 15-minute headways, at best, which are less frequent in many areas in the Valley. Stanislaus public transportation operators have struggled to meet farebox recovery ratios. StanCOG is working tirelessly to provide the most efficient and frequent service possible. In fact, Stanislaus is consolidating its transit operators (with the exception of the City of Turlock) to help implement more efficient and effective service. Changes to make state transit funding, particularly the Transportation Development Act funds, to provide for greater flexibility in the use of funding will be crucial to providing the best service possible. The emergence of transportation network companies, which provide on-demand, personalized service, has eroded the base of choice riders for transit system. More needs to be done to enhance the experience to attract choice riders to utilize transit.

The pandemic's crash course in teleworking, however, has proven it to be effective at reducing travel while maintaining the productivity needs of employers and employees in many industries. We request that CalSTA include in its strategies expanded investment in broadband, particularly in underserved areas, to support enhanced telecommuting, and consider additional strategies such as state support for local implementation of transportation demand management strategies, vanpools, and park-and-ride lots, and VMT- mitigation credits, as well as a statewide telework incentive program (starting with the state workforce), which has strong potential to expedite addressing climate change.

In addition, we appreciate the Governor's direction through N-79-20, and the proposed \$1.5 billion in the FY 2021-22 State Budget, to invest more into zero-emission infrastructure and ask that low-income residents in the Bay Area be considered a priority for rebates for zero-emission vehicle (ZEV) purchases and charging infrastructure as a critical opportunity to help the region realize its air quality and mobility goals. These strategies should be a key part of the CAPTI whose ultimate goal is not just to reduce vehicle miles travel, but also to reduce greenhouse gas emissions. The focus on vehicle miles traveled alone could have the unintended consequence of exacerbating the problem for disadvantaged communities, farmworkers, and laborers where driving is the only option.

Our request is that expanded electric vehicle use and charging facilities and deployment of enhanced broadband capacity should be a key part of our climate action strategy to reduce greenhouse gas emissions and vehicle miles traveled to expedite meeting our climate goals.

The Governor's May Revision provides ample opportunities for augmenting multi-modal options (\$500 million for ATP, \$1.1B for rail and transit, \$500M for grade separations), which should also for maintaining flexibility of existing programs to address highways. StanCOG is supportive of these investments.

### **3. Support the Will of the Voters to Complete Projects and Maximize Investments**

In 2016, almost 72% of Stanislaus voters approved Measure L, a ½ cent, 25-year local sales tax measure that makes multi-modal improvements throughout the county, including some that are on and near the state highway system, which is a state-owned asset. These measures require comprehensive public engagement, contain diverse investments in multi-modal options, and ultimately require a 2/3 vote for passage so they must appeal to vast constituencies. Our agency has made a commitment to the voters and our public to deliver the investments that our expenditure plan promised. A key part of keeping our promises is to secure state matching funds, since each county does not generate enough in local sales tax revenues to make up for the disproportionate cost of delivering projects. This funding gap makes continued access to state funding for a multi-modal range of projects imperative.

In 2017, the legislature enacted SB1 to address mobility, safety and congestion, in addition to maintaining infrastructure. StanCOG initiated the discussion and advocated for the bill to include: the creation of the vehicle registration fee as a carbon-neutral funding source to address congestion and multi-modal options; the creation of the State Rail Assistance

Program, dedicating operations funding for passenger rail service; and augmentation of the Transit and Intercity Rail Capital Program. In 2018 voters rejected Proposition 6 (the repeal of SB 1) and supported Proposition 69 (protecting SB 1). It is important to support the intent of the voters in order to maintain the public trust, by preserving all of the modes supported in the enactment of SB 1.

Our request is to maintain the state and local partnership, and maximize the return on previous investments, by allowing for local sales tax measures to continue leveraging state dollars to deliver highway capacity projects, which would also help facilitate public transportation service.

In conclusion, StanCOG is an eager partner in taking action to combat climate change and deliver more multi-modal options, but we ask that state investments be responsive to the unique needs and characteristics of each region: urban, rural, valley and coastal.

We look forward to partnering with you and the appropriate state agencies to develop pragmatic solutions to meet the objectives articulated in the Executive Orders and providing additional input on the development of CAPTI.

Sincerely,



Terrance P. Withrow  
Chairman  
Stanislaus Council of Governments

cc: The Honorable Andres Borgeas, Senator, 8th District  
The Honorable Anna Caballero, Senator, 12th District  
The Honorable Susan Talamantes-Eggman, Senator, 5<sup>th</sup> District  
The Honorable Heath Flora, Assembly Member, 12th District  
The Honorable Adam Gray, Assembly Member, 21st District  
Ronda Paschal, Deputy Secretary, Governor Newsom  
Mark Tollefson, Deputy Secretary, Governor Newsom  
Hilary Norton, Chair, California Transportation Commission  
Mitch Weiss, Executive Director, California Transportation Commission  
Toks Omishakin, Director, Caltrans  
Darwin Moosavi, Deputy Secretary, California State Transportation Agency  
Kate Gordon, Director, Governor's Office of Planning and Research