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May 19, 2021

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

RE: City/County Association of Governments of San Mateo County (C/CAG) comments on Caltrans's Draft Climate Action Plan for Transportation Infrastructure (CAPTI)

Dear Secretary Kim:

The City/County Association of Governments of San Mateo County (C/CAG) appreciates the opportunity to provide comments on the Caltrans Draft Climate Action Plan for Transportation Infrastructure (CAPTI). C/CAG is both the County Transportation Agency (CTA) and the designated Congestion Management Agency (CMA) for San Mateo County. In addition, C/CAG plays a key role in climate action planning and mitigation of greenhouse gas emissions in partnership with all the cities and the County in San Mateo County. In addition, C/CAG plays a key role in Stormwater Pollution Prevention and is the Airport Land Use Commission in San Mateo County. San Mateo County's land area on the SF Peninsula is crisscrossed by five north-south state highways and three running east-west.

C/CAG's Board of Directors is composed of 21 elected officials, including one San Mateo County Supervisor and one councilmember from each incorporated City and Town in San Mateo County. San Mateo County has 21 jurisdictions, a population of 774,000, and is an integral part of the dynamic Silicon Valley/San Francisco economic region. San Mateo County is home to 16 of the top 100 employers and 26 of the top 50 biopharma employers in the Bay Area.

The CAPTI is a broadly coordinated plan in response to multiple governor executive orders and focuses on transitioning state infrastructure priorities to align with reducing transportation greenhouse gas emissions. As such, it shares much in common with C/CAG's principles and outlines a path forward for a more environmentally sustainable and equitable future. C/CAG's comments are supportive and provided within the context of our long-standing positive relationship with Caltrans.

Thank you for this opportunity to provide input on this critical document. Please see Attachment 1 for C/CAG's comments on the CAPTI. If you have any questions, please contact Sean Charpentier, C/CAG Program Director, at scharpentier@smcgov.org.

Sincerely,

A handwritten signature in black ink that reads "Sandy Wong". The signature is fluid and cursive, with a long horizontal stroke at the end.

Sandy Wong
C/CAG Executive Director

cc:

The Honorable Kevin Mullin, Assembly Member, 22nd District
The Honorable Josh Becker, State Senator, 13th District
The Honorable Scott Wiener, State Senator, 11th District
The Honorable Marc Berman, Assembly Member 24th District
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

Enclosures: Attachment 1: C/CAG's Comments on Caltrans's Draft Climate Action Plan for Transportation Infrastructure

Attachment 1: C/CAG's Comments on Caltrans's Draft Climate Action Plan for Transportation Infrastructure (CAPTI)

General Comments:

1. In order to better adapt our roadways to the impacts of climate change, C/CAG recommends the CAPTI prioritize inclusion of green infrastructure into all appropriate roadway investments.

Green infrastructure (such as stormwater/bioretention curb extensions, sidewalk stormwater planters and tree wells, and rain gardens), captures and infiltrates stormwater runoff to help prevent storm drain systems that are sized for the storms of the past from being overwhelmed by the storms of the future. In addition, green infrastructure cleans stormwater runoff and helps address the significant negative water quality-based environmental impacts of roadways. Green infrastructure can increase tree canopy to provide shading to address heat island issues that is expected to be worsened with climate change. Finally, green infrastructure can solve drainage issues and enhance safety when integrated with transportation projects.

C/CAG recently developed a Countywide Sustainable Streets Master Plan using a Caltrans Adaptation Planning Grant that prioritizes opportunities to integrate green infrastructure with planned active transportation, Complete Street, and Safe Routes to School/Transit investments. The Master Plan models future precipitation-based climate impacts in San Mateo County and quantifies the potential benefit of widespread implementation of Sustainable Streets in mitigating the projected increase in stormwater runoff volume that is likely to overwhelm storm drain systems and cause flooding of our streets. The Master Plan and associated appendices can be found at www.flowstobay.org/ssmp. C/CAG strongly recommends the CAPTI prioritize integration of green infrastructure for climate adaptation and water quality improvement in State planning, programming, and investment programs, especially those programs that support active transportation investments.

C/CAG also recommends the CAPTI investment framework include an additional guiding principal focused on prioritizing integration of climate adaptation measures in all appropriate transportation investments, including green infrastructure and nature-based solutions. A comment has been added for Strategy 5, below.

2. The State agencies supporting the development of CAPTI should consider using local transportation data, including local models and, especially, DMV vehicle registration with odometer data to better understand opportunities for reducing VMT in local communities, through which state highways pass. Patterns of use of vehicles and transit are a local phenomenon and should be integral in local project selection for GHG reductions projects.
3. C/CAG suggests adding language regarding the importance of key highway interchange improvements that improve operations, enhance vehicular and bicycle and pedestrian safety, and facilitate transit and other HOV access. These interchange projects typically also include bicycle and pedestrian improvements and close critical gaps in our active transportation network, improve operations and safety for all modes, reduce idling and associated GHG emissions, enhance access for transit and other HOV modes, and advance sustainable economic development and housing goals. The review of such projects should consider all the benefits that align with the local, regional, and State goals.

4. C/CAG believes that CALSTA should continue to support highway improvements that may necessitate some highway capacity projects in order to accommodate emergency evacuation routes, goods movement traffic, transit travel times, and commuters.
5. C/CAG recommends that any changes in funding opportunities, as a result of the adoption of the CAPTI and its priorities, be addressed through a series of comment periods for each of the grant or funding programs, or through the NOFO process, and that specific changes to funding programs, adopted as a result of the CAPTI, be clarified in a specific section of NOFO documents.
6. In general, it is important that disadvantaged communities are prioritized, particularly for access to zero emission vehicles and charging infrastructure, as well as infrastructure assets and connectivity for active transportation. The scale of the reduction in GHG and VMT will require ensuring that investment opportunities are available for all communities. Also, GHG/VMT reducing investments can improve air quality on a larger scale, leading to air quality improvements in underserved communities.
7. The CAPTI should consider Additional strategies to reduce GHG, including: telework, state support for local implementation of transportation demand management strategies, vanpools and park and ride lots, and VMT-mitigation credits.

Comments on Document:

1. Page 10, (Minor Typo) Developing the Climate Action Plan for Transportation Infrastructure (CAPTI) “Winter – Spring 2021” and “Summer 2021” indicators are reversed in the graphic.
2. Pages 15-17, Guiding Principles
C/CAG suggests that networks of express lanes and express busses are a significant opportunity to reduce single occupancy vehicle VMT and GHG emissions. Express Bus programs should be included specifically in Guiding Principles.
3. Page 16, “Making safety improvements ...”, C/CAG suggests adding “separated bikeways”.
4. Page 16, “Promoting projects that do not significantly increase passenger vehicle travel.” C/CAG is committed to considering feasible alternatives. Regarding Managed and Express Lanes, the goal is to have a seamless network to facilitate mode shift from SOV to HOV, including carpools and express buses. Some capacity expansion to accommodate express lanes might be necessary to close critical gaps in the network. Accordingly, strategic and focused capacity expansions and pricing mechanisms can be complementary aspects to complete the express lane network and provide options for mode shift.
5. Page 16, Question on the phrase “Assessing physical climate risk”: does this mean don’t build in areas of climate risk, or does it mean to provide infrastructure such as shade shelters in heat island areas? C/CAG suggests that an example be given to clarify meaning.

Strategy Comments:

1. Strategy 1.1: For express lanes or other revenue generating mechanisms, there should be priority provided to projects that are part of a system with an approved and demonstrable equity program that improves the mobility outcomes for underserved communities.
2. Strategy 1.4: The agencies implementing improvements in trade corridors are often local project sponsors and/or CTAs, and they are not necessarily the agency responsible for implementing zero emissions infrastructure at major logistics hubs (port, rail, air). It might be challenging to synchronize roadway or interchange improvements on trade corridors with the investment in zero emissions infrastructure at the logistics hubs. It would be helpful to clarify this connection in the document and or the application guidelines.
3. Strategy 2.4: C/CAG supports efforts to prioritize ATP investments in underserved communities. The scale of the change required to reduce GHG is going to necessitate significant investments in underserved communities as well as other communities. ATP investments connect all communities and households to work, school and recreation. The Draft C/CAG Bicycle and Pedestrian Plan Update includes 250 miles of bicycle and pedestrian improvements throughout the county, which will cost approximately \$427 million.
4. Strategy S3.4: Clarify if the Equity Index would be used to evaluate projects where Caltrans is a co-sponsor, or when another entity is the project sponsor, and would it be used in any of the funding programs recommended on page 13?
5. Strategy 6.1: Clarify if there will be a framework for how VMT/GHG mitigation measures will be evaluated and accepted, and if the mitigation measures will be funded as part of project costs. In addition, Strategy 6.1 should note the ability of express lanes or other pricing structures to mitigate VMT/GHG impacts on an ongoing basis as part of an ongoing investments in VMT/GHG reducing activities.
6. Implementation Strategy 5 should be expanded to specifically prioritize integration of green infrastructure and nature-based solutions in transportation investments that help adapt the roadway network to the impacts of climate change.
7. Strategy 6.2: C/CAG welcomes this and would like to be part of it. Many of our comments are related to how pricing can be an effective mechanism to effectuate mode shift and provide incentives for GHG reduction activities.

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