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**By Electronic Mail**

May 19, 2021

California State Transportation Agency (CalSTA)
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

Subject: Climate Action Plan for Transportation Infrastructure

Dear Members of the California State Transportation Agency:

Thank you for the opportunity to provide comments on your draft Climate Action Plan for Transportation Infrastructure (CAPTI), which you expect to finalize July 2021. I write on behalf of staff in the Coastal Transportation Program of the California Coastal Commission. The Coastal Commission is an independent state agency that regulates development along California's coastline to protect natural coastal resources and to maximize coastal access and recreation for all. We have a long history of partnership with Caltrans and other state agencies on transportation issues along California's coastline, often also in partnership with local county or city governments. Through these partnerships we are striving to provide a safe and resilient transportation network along California's coastline that also protects and enhances coastal natural resources and public access.

As an initial and overall comment, we want to applaud this document and the important direction it sets on multiple policy issues. Along with the Caltrans 2020-2024 Strategic Plan, the California Transportation Plan 2050 (CTP 2050), and other prominent recent strategic transportation plans, key blueprints have been laid out for reducing transportation air pollution and GHGs, minimizing VMTs, improving multi-modal transportation, addressing the need for greater equity in transportation, and enhancing the resiliency of our transportation network in the face of climate change, particularly with sea level rise and our coastal highways.

The policies of the California Coastal Act that guide our work at the Coastal Commission significantly overlap with the goals of this CAPTI, including policies to protect marine and coastal land habitats, concentrate urban development, maximize public access and expand multi-modal transportation, and improve our coastal resiliency to sea level rise and other climate-change hazards. The Coastal Act was also recently amended to add Environmental Justice as a policy to be analyzed in our regulatory work, with a designated Environmental Justice

commissioner on the Coastal Commission. Accordingly, we primarily want to offer ourselves as a partner in this important work to carry forward the CAPTI. Additionally, in this letter, I would like to offer a few broad comments on behalf of Coastal Commission staff on the CAPTI.

Ensuring Implementation

Overall, the CAPTI has a number of updated transportation policies we whole-heartedly support. Ultimately, the important question then is how will these policies be specifically implemented and lead to changes in ways that projects are selected, developed, designed, and carried forward. Overall, it appears the CAPTI sets a series of policy guidelines in making determinations over the funding of projects, but it would be good to understand in more detail how this will lead to the procedural changes necessary to make projects that actually carry forward the policies advocated for in this document. In our work with Caltrans through our Integrated Planning Team partnership and our work to develop and now implement the AB1282 Transportation Permitting Task Force Final Report 2019, we have seen the need for important early consideration of these types of issues and policies, when transportation agencies select projects, initially scope projects, consider project alternatives, and make initial design decisions. How do we ensure these considerations are in the forefront of project selection and project design, and considered in the earliest phases of project development? There are also now a number of overlapping general planning documents, such as the aforementioned Caltrans Strategic Plan and CTP 2050, as well as the State Highway Management Plan. The development of a roadmap as to how all these important plans integrate together and where and how they are intended to guide specific Caltrans' transportation plans and investments seems essential for best moving into the future.

Greater clarity and detail seem to be particularly called for when it comes to funding mechanisms given that the draft CAPTI estimates it will leverage "more than \$5 Billion in discretionary state transportation funds to reduce GHG emissions in the transportation sector and adapt to climate change." Obviously, that level of investment is significant, though it is quite likely the actual need will be greater. The CAPTI draft, however, is unclear how and how much of these "discretionary" funds will be directed toward emission reductions and climate change adaptation. For instance, the CAPTI describes \$4.2 billion of SHOPP funds to be leveraged, but SHOPP has its own separated standing requirements and guidelines. How will these requirements interact? Will CalSTA be developing companion climate-change-specific funding strategies and investment decision criteria? These seem to be important questions because, at this point in time, dedicated funding for sea level rise and other climate change adaptation projects in the transportation section is urgently needed. It is important to understand how various funding sources, including both SHOPP and STIP funds, can be directed at the corridor- and project-specific level. Our experience along the coast often finds that projects are inadequately analyzed from a corridor vulnerability perspective and also struggle for project funding to support resiliency, adaptation, or emission reductions. How can funding be better identified and allocated to create important resiliency projects or climate change

adaptation/reduction projects? Amidst so many competing objectives within transportation programs, it seems that the pressing needs to address climate change issues must be given greater prioritization. This document offers a compelling start, but we encourage detailed follow through on these commitments to ensure the identified discretionary resources (and eventually more) are allocated to specific projects and plans that reflect the goals of this plan.

Fix-it-first approach

The CAPTI also maintains the SHOPP fix-it-first approach, however, the plan recognizes that “we cannot afford to invest in projects that ultimately run up our long-term maintenance costs without bringing an outsized benefit to climate, health, and equity goals.” We want to underscore this point given its importance and because in much of our recent transportation work in partnership with Caltrans and other state agencies, for instance under the AB1282 Transportation Permitting Task Force, we have focused on including the long-term maintenance costs and climate change adaptation impacts into early project development and the considerations of alternatives. Fix-it-first approaches need to consider the long-term changes to geographic contexts expected in upcoming years and the full lifecycle maintenance costs that may be associated with them. When properly considered, and supported by adequate technical studies, numerous alternatives can be developed to repair, operate or otherwise improve highway transportation infrastructure. Furthermore, many studies indicate that investments made now to accommodate future projected climate change impacts are frequently less expensive than waiting until the infrastructure needs repair. Thus, in many cases, “fix it first” should be taken to incorporate proactively addressing vulnerable transportation infrastructure before that infrastructure becomes “broken.”

Multi Modal/Active Transportation/Reduced VMTs

Implementation goal S2 is to “Support a Robust Economic Recovery by Revitalizing Transit, Supporting ZEV Deployment, and Expanding Active Transportation Investments.” We applaud the stated goals to support transit and ZEV deployment and look forward to working with our transportation partners to implement those goals in the Coastal Zone. This section of the CAPTI also includes a laudable goal of increasing active transportation investments and closing active transportation gaps on portions of the State Highway. Overall, we agree with the CAPTI when it notes that ATP is underfunded in comparison to other transportation funding programs and active transportation needs increased funding. We note here that the Coastal Commission has long worked with Caltrans on active transportation, mostly focused on completing gaps of the California Coastal Trail (CCT). The CCT is a vision for a complete multi-modal trail along California’s coast, with many segments already developed. Completing the CCT is a goal shared by the Coastal Commission with several other state agencies, including Caltrans. For instance, Section 31408 of Public Resources Code, Division 21, obligates Caltrans to “cooperate with the [State Coastal] conservancy with respect to planning and making lands available for completion of the [California Coastal] trail, including constructing trail links, placing signs, and managing

the trails.” We look forward ongoing work with our state transportation agency partners to expand the CCT and active transportation generally, with this CAPTI as further impetus.

We also want to highlight as of particular importance in the Coastal Zone, that multi-modal trails can also provide a critical active transportation resource in areas that are rural, but experience heavy transportation demand due to a high density of visitor destinations, which is often the case along our coast in areas such as Big Sur. Pedestrian and bicycle routes are a critical component of traffic demand management in these destination-rich rural locations because they provide ways for the public to travel between multiple visitor destinations without having to repeatedly drive and park at each individual site, improving road conditions for residents and visitors alike.

Additionally relevant here is goal S7.3 Explore a “Highways to Boulevards” Conversion Pilot Program, which provides that CalSTA will work with Caltrans to pursue the creation of “a pilot program to initially plan for — with the goal to ultimately fund — the conversion of key underutilized highways in the state into multi-modal corridors that serve existing residents by developing affordable housing and complete streets features.” We note that the Coastal Commission has now worked with Caltrans on several projects to adapt coastal highways to sea level rise and converted retired highway segments into segments of the CCT serving as multi-modal corridors. These projects may provide useful examples and we are, of course, available to share any information and lessons learned from these projects.

Equity

The CAPTI has several praiseworthy goals related to increasing equity in our transportation network throughout the document, but specifically including the goals of S3, “Elevate Community Voices in How We Plan and Fund Transportation Projects.” S3 references the need to coordinate “across state agencies to develop standards and practices for meaningful engagement,” and S3.1 proposes to establish a Transportation Equity and Environmental Justice Advisory Committee(s), while S3.3 proposes Caltrans establish a community engagement playbook that catalogues best practices and lessons learned from state, regional, and local agency and community-based partners.” In this regard, we note that the Coastal Commission adopted an Environmental Justice Policy in 2019 and a staff program to implement the policy, during which we conducted extensive research and developed guidance documents. For more resources on how CCC developed standards and practices for meaningful engagement see our [Environmental Justice webpage](#). Our sister agency BCDC also recently created a Environmental Justice Advisory Committee as referenced on the [BCDC website](#). These efforts could inform the implementation of these CAPTI equity recommendations. In our own work on Environmental Justice, the Coastal Commission found it essential to hiring staff specifically focused on advancing Environmental Justice and/or Social Equity, including an Environmental Justice Program Manager and staff in each coastal district focused on community engagement. The

CAPTI may propose similar such staffing. Once again, we are available to share any information and lessons learned in the development of equity programs or committees.

Lastly, it would be helpful if the CAPTI includes some specific commitments and dates for some of the equity goals. It would also be helpful if the CAPTI includes a target percentage of funding or other resource allocation for priority projects addressing equity in transportation. If the CAPTI is unable to set some distinct commitments, we encourage the proposed advisory committee or programs leading action on the other goals develop such public commitments, which will add an additional layer of accountability for the public.

Resilience and Sea Level Rise.

Implementation Goal S5 is to “Support Climate Resilience through Transportation System Improvements and Protections for Natural and Working Lands.” We would recommend this section be expanded and strengthened. Reading goals 5.1 and 5.2 together, the CAPTI proposes that Caltrans and the Governor’s Office of Planning & Research (OPR) develop new guidance on climate impacts and how to use climate science and complete vulnerability assessments and priority reports, and then update Transportation Infrastructure Competitive Program Guidelines to reflect the new guidance. However, both the Caltrans vulnerability assessments and priority reports are now complete, and in the case of sea level rise, internal Caltrans guidance on incorporating sea level rise considerations into project delivery and corridor planning is already near completion, to be released later this year. Moreover, the CAPTI only references Caltrans and the OPR in developing this guidance. Yet the state Ocean Protection Council and the Coastal Commission has developed a robust sea level rise planning guidance documents that apply best available science and methods for proper sea level rise analysis and adaptation strategies. These ideas have already been folded into Caltrans internally in a [sea level rise planning webpage](#) to guide project delivery. The OPC/Coastal Commission guidances should be referenced as the best available science and necessary references for project development or corridor planning.

We should also mention our forthcoming guidance, ‘Critical Infrastructure at Risk: Planning Guidance for California’s Coastal Zone,’ which Caltrans has already had input into and a final public draft will be released soon. This document can also inform the development of climate resilient transportation infrastructure by the state.

We note that Goal S5 only mentions wildfires as an issue for climate change impacts on state roadways. Yet, it is clear that sea level rise related flooding and erosion are already urgent problems facing our transportation infrastructure, threats that are being magnified every day. Transportation projects are already underway that must consider and plan for adaptation from sea level rise. These projects urgently need resources to properly analysis sea level rise and plan for adaptation and they need to be prioritized. For instance, the recent Caltrans 2021 SHSMP identified the SLR adaptation funding needed to be \$11 billion by 2030, yet the SHSMP was

unable to allocate any funding to that need. The Coastal Commission has approved several very important and landmark transportation adaptation projects in recent years, yet many others are awaiting resources urgently needed. We recommend that this goal specifically call out the need at this time to update Transportation Infrastructure Competitive Program Guidelines, or other funding programs, to specifically direct funds to climate change adaptation efforts especially those for sea level rise. Lastly, this goal should mutually reinforce goal S4 “Advance State Transportation Leadership on Climate and Equity through Improved Planning & Project Partnerships.” Leadership on climate also requires adaptation planning as well as reducing VMTs and GHGs and its important that the CAPTI call out the need for ongoing and improved partnership around climate change adaptation planning in goal S4 as well.

Mitigation for VMTs

Under Implementation Goal S6.1, “Explore New Mechanisms to Mitigate Increases in Vehicle Miles Travelled (VMT) from Transportation Projects,” the CAPTI proposes that CalSTA and Caltrans will work with “local and regional transportation agencies” to develop new VMT mitigation mechanisms including mitigation banks and the expansion of the Advanced Mitigation Program to reduce VMTs “for highway capacity projects” Overall, we highly support this important proposal. We also note that the Commission and Caltrans are currently partner agencies in developing an Advance Mitigation Program and partnering on other advanced mitigation banks. So, state natural resource agencies, such as the Coastal Commission should be listed as potential partners in VMT mitigation strategies. Secondly, the CAPTI does not spell out any VMT mitigation measures or chart a path forward for specifically developing such measures, which would be helpful to develop. Thirdly, the plan reference to “highway capacity projects” is unclear if it refers to new highway expansions or just highway capacity generally. Increasing highway capacity would be inconsistent with the rest of the CAPTI document, as well as the Coastal Act, whether or not it came with VMT mitigation. Moreover, in our experience, transportation projects often cite maintaining current VMTs as equating to no GHG impacts. However, the goal is not to maintain our current GHG emissions, but to reduce them, with the current goal as 40% below 1990 levels by 2030. And, as the CAPTI acknowledges, the state is not on track to meet those targets (largely because of transportation emissions) and we are currently “in the middle of a climate crisis.”

It is clear, therefore, that along with strategies to reduce our transportation sector GHG and air pollution emissions, GHG mitigation can play an important role. Caltrans already undertakes significant amounts of habitat restoration that could be leveraged and expanded to increase mitigation for current levels of VMT and help California reach its climate changes goals. We agree that the advanced mitigation program is a great vehicle to realize some of these goals, but project level mitigation efforts can also be funded with an eye towards VMT mitigation in addition to any habitat mitigation already required. (See also Implementation Goal 5.3 which also calls out Incentivizing Land Conservation through Transportation Programs.”) We

recommend that the CAPTI more explicitly call out the role for VMT mitigation strategies such as habitat preservation, habitat creation, and carbon capture. These strategies could be employed more generally, beyond projects that increase highway capacity.

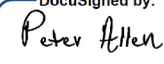
This section also includes a sub-goal to convene a working group to develop equitable roadway pricing implementation pathways. We have noted before in a letter regarding the CTP 2050, that there are concerns with roadway pricing and its potential impacts to lower income residents and visitors to the coast. We are glad to see that equity concerns are so clearly called out here and we hope this remains an important consideration in any roadway pricing proposals. We note again that such proposals should consider equity issues related to visitors to coastal areas, who rely on state highways for coastal recreation, as well as residents.

Conclusion

Lastly, in reviewing the table at the end of the document summarizing the policies and implementation actions, multiple lead and support agencies are listed. However, these agencies appear to be all transportation entities and no resource agencies are listed as supporting agencies. It is worth re-iterating then that Caltrans and the Coastal Commission have longstanding partnership in which we have together poured significant resources through multiple partnering agreements, statewide plans, district plans, and through specific projects into working on climate-change related issues in the transportation sector. We hope this letter has indicated some of the ways we can help support this CAPTI plan and its development, and believe there is room for natural resource agencies to partner with transportation agencies in implementing CAPTI.

As stated at the beginning of this letter, there are just some general comments and suggest refinements going forward as this plan is finalized and implementation of its recommended policies can begin. We look forward to working with Caltrans and our other state agencies partners in undertaking this important work. Please contact me if you have any questions or any follow-up comments on any issues raised in this letter. I can best be contacted at peter.allen@coastal.ca.gov. Many thanks again for the opportunity to provide comments.

Sincerely,

DocuSigned by:

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Peter Allen

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