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May 19, 2021

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

**RE: Draft Climate Action Plan for Transportation Infrastructure (CAPTI) Comments**

Dear Secretary Kim:

The California State Association of Counties appreciates the opportunity to provide comments on the draft Climate Action Plan for Transportation Infrastructure (CAPTI). As the owners and operators of over 80% of the centerline road mileage in California, counties and cities are integral part of the state’s multimodal transportation system. In addition to serving as the starting and ending point for nearly every trip taken by car, these local roadways are also the primary right-of-way for active transportation and transit buses. Continued investment in the maintenance of local roadways, as well as increased funding to improve local road safety and provide better access to bicyclist and pedestrians, are both necessary preconditions for achieving the state’s climate and transportation sustainability goals.

CSAC supports a balanced transportation policy that recognizes the need to promote alternatives to driving by improving state and local roadways to add safe access for transit, bicycles and pedestrians where feasible and appropriate. At the same time, CSAC supports transportation investments that facilitate interregional travel and goods movement, especially in parts of the state that are growing more rapidly. CSAC also supports continued dedicated state and federal funding for maintenance and rehabilitation of local roadways and bridges as part of a broader climate change strategy. Effective asset management can reduce the lifecycle carbon emissions associated with local roads and bridges, as well as make funding available for broader transportation priorities. With these broader priorities in mind, we provide the following comments on the draft CAPTI:

**Guiding Principles – Maintaining a “Fix-it-First” Approach**

CSAC supports the continued prioritization of preventative maintenance, repair, and rehabilitation of existing transportation infrastructure. Despite the significant increase in dedicated local road maintenance funding from SB 1 (Chapter 5, Statutes of 2017), counties have significant unmet needs to sustainably maintain local roads and bridges. Local governments will face enormous challenges to maintain this infrastructure while also improving it to facilitate alternatives to driving, increase resilience to disasters,

and adapt to the impacts of climate change. Over the long-term, cost-effective road maintenance would reduce funding needs, thereby freeing up resources for other local transportation priorities. Unfortunately, such a scenario is only achievable with billions of dollars in additional investments in preservation and repair over a sustained period of time.

Based on a statewide analysis of local pavement conditions and available funding completed in 2020, cities and counties have identified a ten-year shortfall of \$64 billion compared to the level of funding required to sustainably maintain local road pavements, bridges, and essential components (e.g. sidewalks, curbs, gutters, signage, signals, etc). Of the approximately \$6.4 billion in annual additional need, \$3.76 billion annually would be required to bring pavements on local streets and roads into a condition where ongoing maintenance is sustainable and cost-effective. For locally-owned bridges, it would take approximately \$400-500 million in additional annual funding to simply maintain current condition (measured by deck area, 47.9% of California's local bridges are in good condition, 40.6% are in fair condition, and 11.5%, or 1,035 bridges, are in poor condition).

#### **Action S2.4 – Increase Funding to Active Transportation Program**

CSAC supports additional funding for local active transportation improvements, but not through the diversion of existing state formula funds dedicated to local streets and roads. Additional resources for the active transportation program (ATP) should be considered as part of broader proposals to increase overall transportation funding, or through one-time investments, such as the current state budget surplus or federal stimulus funding. CSAC also supports examining creative options to maximize the use of current ATP funding.

Using SB 1 funds, local agencies are increasingly integrating improvements that support active transportation into their road maintenance and rehabilitation projects, including improvements that might have otherwise sought competitive grant funding. For example, active transportation components were included in 1,458 of the 5,279 projects that cities and counties completed with SB 1 Road Maintenance and Rehabilitation Account funds during the first two-and-a-half fiscal years of the program (2017-18 through 2019-20). For planned projects included in fiscal year 2020-21 lists submitted to the California Transportation Commission, local governments identified 269 of the 2,761 projects as including active transportation components.

Aside from exacerbating the overwhelming maintenance and repair needs identified above, a diversion from local streets and roads formula funding to the Active Transportation Program would simply reallocate flexible funds that are already often used to maintain active transportation facilities or create new active transportation infrastructure during larger rehabilitation projects.

At the federal level, CSAC supports increasing ATP funding as part of any broader increase in transportation funding to the State of California. We note that dedicated funding for local off-system bridges from the Surface Transportation Block Grant Program, as well as funding available to federally-eligible local bridges and local safety improvements has been stagnant for several years. In addition to their importance in supporting fix-it-first investments, local bridge replacement or rehabilitation projects can directly support active transportation by closing bicycle or pedestrian facility gaps, while the local highway safety improvement projects implement evidence-based safety improvements that benefit all roadway users, including pedestrians and bicyclists. Accordingly, CSAC notes the importance of taking a comprehensive view of all available federal resources and programs and considering how they interact with and support the broader goal of supporting active transportation.

Finally, CSAC supports studying creative options to better leverage existing ATP funding, including opportunities to “de-federalize” ATP-funded projects through exchanges with state funds, thereby reducing soft costs associated with the use of federal funds. As an alternative to directly shifting funds from other formula programs, the ATP could consider enhanced matching requirements—but only where such requirements would increase funding leveraged to support active transportation purposes without discouraging applications from small or disadvantaged communities.

**Action S2.5 – Convene Discussion Regarding Sustainable Rural Transportation**

CSAC supports policies to ensure that rural and unincorporated areas continue to benefit from competitive state transportation investments under the CAPTI framework. Some of the strategies useful for promoting alternatives to driving in urban areas may not be applicable in rural and unincorporated areas with lower population densities, so the action to conduct a focused conversation with local partners in rural areas about transportation sustainability is needed. This conversation should include consideration of the special circumstances that may warrant additional capacity-enhancing transportation investments in rural parts of the state with less developed infrastructure and higher rates of roadway collisions and fatalities.

As a general comment, discretionary transportation programs that are applicable in both urban and rural environments—including investments in active transportation infrastructure, safety improvements and fix-if-first investments—should consider funding set-asides, flexible eligibility requirements, and streamlined reporting to ensure that rural communities can submit competitive applications. Finally, rural areas may lack supporting infrastructure needed for housing development in existing “location efficient” communities. Considering transportation and other infrastructure needs holistically, including making flexible funding available, can help achieve both housing and transportation emission reduction goals in rural areas.

**Strategy 4 – Advance State Transportation Leadership on Climate and Equity through Improved Planning and Project Partnerships**

CSAC supports efforts to improve coordination between Caltrans and local partners to add improvements on state facilities to promote safe active transportation, especially in areas where state highways serve as a local main street or where local facilities intersect with state highways. Counties look forward to reviewing forthcoming Caltrans Active Transportation Plans (CATP) under development in each Caltrans district, but counties would benefit from greater certainty as to improvements that can be incorporated into state facilities.

While the forthcoming CATPs may help meet this general objective, CalSTA may want to consider an action item to convene counties and other interested stakeholders to develop general parameters for consideration of such improvements on state highway facilities. Specifically, local partners would benefit from additional certainty as to how local agencies can nominate projects, what types of improvements will be acceptable, whether the state or local government will be responsible for funding the improvement, and how ongoing maintenance will be conducted and funded.

**Action S5.3 – Explore Incentivizing Land Conservation through Transportation**

CSAC encourages CalSTA to ensure that this action can also identify opportunities for state transportation investments to support local and regional conservation efforts, as well as ensure that projects on state highway facilities are able to contribute to locally-required mitigations where appropriate (e.g. Local Coastal Plans, Habitat Mitigation Plans, Natural Communities Conservation plans).

**Implementation Strategies and Actions – Ongoing Engagement**

Given the framing of the CAPTI as a living document, CSAC urges CalSTA to ensure that counties and other interested parties are given ongoing opportunities to engage and comment on the final draft and any future implementation actions.

Thank you for the opportunity to provide these comments. We appreciate the willingness of CalSTA staff to present to county representatives and answer questions while the Administration was developing the draft CAPTI. We look forward to continued opportunities to engage and provide comments as the plan is finalized and moves into implementation. Please don't hesitate to contact me at [clee@counties.org](mailto:clee@counties.org) or (916) 327-7500 with any questions about our comments.

Sincerely,



Christopher Lee  
Legislative Representative