May 27, 2021

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

RE: LA Metro Comments Regarding Draft Climate Action Plan for Transportation Infrastructure

Dear Secretary Kim:

The Los Angeles County Metropolitan Transportation Authority (LA Metro) is deeply committed to improving mobility, equity, public health and quality of life for LA County residents. As the state’s most populous county with the busiest seaport complex, we recognize that our work implementing transportation projects, programs and technologies will play a vital role in the state realizing its climate goals, and we appreciate the state’s support in driving investment into LA County to leverage local funds and to improve the way we move people and goods.

LA Metro very much appreciates your leadership at the California State Transportation Agency (CalSTA), especially in leading the important collaborative dialogue to develop policies increasing accessibility, improving air quality and combating climate change. LA Metro stands ready to partner with the state to attain these mutual outcomes, and we are pleased to submit the following comments on the Draft Climate Action Plan for Transportation Infrastructure (CAPTI) released on March 10, 2021.

LA Metro supports the goals and vision of the CAPTI and welcomes several updates to the preliminary draft plan materials. First and foremost, we appreciate the proposed increase of vitally important funding for zero emission public transit vehicles as part of an accelerated Cap-and-Trade Program. This funding will help advance Metro’s initiative to transition the agency to a 100 percent zero emission bus fleet by 2030. We would further urge the state to commit to dedicated and ongoing funding to replace all heavy duty non-zero emission transit vehicles with zero emission technology as soon as possible.

LA Metro compliments CalSTA’s efforts and success in identifying some of the many ways that equity must be directly addressed within the actual strategies of the plan. As a leader in implementing equity into its policies and programs, Metro supports the principles of diversity, equity and inclusion in transportation investment decisions, and looks forward to working with you to help identify areas of improvement so we can achieve safe and equitable access to opportunity for all Californians. To that end, we also look forward to working with you to identify funding to increase the resources available for the Active Transportation Program among other programs designed to support these important goals.

LA Metro supports the efforts identified in the CAPTI to expand the use of priced managed lanes in California. As this effort proceeds, we urge the State to recognize two important principles that should be respected in existing and future pricing programs and policies. First, when local agencies sponsor projects, they are also responsible for the financing of those projects; therefore, the responsibilities of the local agency with respect to the management of toll revenues should be preserved. Second, the local agencies that
manage these programs should retain local authority to make decisions relating to the operation of the pricing systems.

LA County's—and the state's—economic recovery from COVID-19 will depend heavily on the efficient, sustainable, and equitable movement of goods through the Ports of LA and Long Beach and between regional manufacturing, logistics and distribution facilities, and to local businesses and homes. Diesel-powered freight vehicles have arguably the greatest impact among mobile sources on climate outcomes, thus they are perhaps the most critically important components of the capital landscape to transform immediately. LA Metro supports an expedited transition to a zero-emission freight future, particularly opportunities to invest in infrastructure necessary to support future usage of zero-emission freight vehicles. Our I-710 Clean Truck Program seeks to implement a progressive transition to zero-emission technology, which includes an important interim step of replacing existing Class 8 diesel trucks with available low-NOx, near-zero emission technology to address equity, air quality and public health needs for LA County today. According to our 2021 Goods Movement Strategic Plan, the health effects associated with exposure to diesel truck emissions exacerbated the impacts of COVID-19 and created greater rates of morbidity. Taking an aggressive approach—both for the interim near-zero approach and the ultimate zero-emission solution to replacing diesel trucks—to improving the climate will help LA Metro achieve greater public health for LA County residents, many from disadvantaged and minority communities that live along major goods movement highway corridors.

LA Metro also supports strategies and policies to reduce Vehicle Miles Traveled (VMT). We appreciate CalSTA’s recognition of the importance of roadway improvements that increase bus speeds and that generate revenue to support VMT-reducing modes of transportation, such as priced, managed lanes (ExpressLanes in LA County). Metro staff looks forward to working with the California Transportation Commission (CTC) on the details of the proposed VMT bank, which is an important concept that will make the transportation funding programs workable. We appreciate this recognition and we further recommend that these ExpressLanes facilities be recognized as supporting person throughput and encouraging commuters to opt out of congestion.

On behalf of LA County I thank and commend you and your staff for the excellent effort and transparency that you have used to develop the Draft CAPTI. We look forward to working with you and the CTC to finalize and implement this transformative plan.

Should you have any questions about these comments, please contact Wil Ridder, LA Metro’s Executive Officer for State/Federal Policy and Programming at ridderw@metro.net or 213-922-2887.

Sincerely,

Phillip A. Washington
Chief Executive Officer