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May 19, 2021

The Honorable David S. Kim
Secretary, California State Transportation Agency
915 Capitol Mall
Sacramento, CA 95815

Re: Letter on the Climate Action Plan for Transportation Infrastructure

Dear Secretary Kim,

Thank you for inviting comments on the Climate Action Plan for Transportation Infrastructure (CAPTI). SACOG appreciates the opportunity to provide feedback on this plan as it has tremendous potential to improve the alignment between state transportation funding and the implementation of regional Sustainable Communities Strategies and the goals of Senate Bill 375. We look forward to working with CalSTA, Caltrans, the California Transportation Commission, and other partners to help advance the strategies outlined in CAPTI to create a more sustainable, equitable, and healthy transportation system for California.

Beginning with the Sacramento Region Blueprint Project in 2004, SACOG has nearly two decades of experience analyzing the relationship between land use decisions and travel behavior. The primary goal of the Blueprint Project was to integrate land use and transportation planning to help curb sprawl, cut down on vehicle emissions, and reduce congestion to improve the quality of life for residents of the region. SACOG's Blueprint work is carried on in the development and implementation of the region's Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). The 2020 update of MTP/SCS lays out a transportation investment and land use strategy that, together, support a prosperous region with access to jobs and economic opportunity, transportation options, and affordable housing that works for all residents. The MTP/SCS outlines a path for improving our air quality, preserving open space and natural resources, and helping California achieve its goal to reduce greenhouse gas emissions that contribute to climate change. We are encouraged by the holistic approach to achieving climate, equity, and health objectives described in CAPTI and think that the plan has the potential serve as a strong implementation compliment to regional plans around the state and the California Transportation Plan 2050.

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Galt
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Wheatland
Winters
Woodland
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Yuba County*

The seven strategies described in CAPTI, along with the supporting actions, contain many parallels to the policies and actions contained in SACOG's 2020 MTP/SCS and our ongoing implementation efforts. Partnering with regional and local governments will be a critical component of successfully implementing CAPTI. SACOG is eager to work with the state to identify opportunities for improved coordination and relationships between local, regional, and statewide efforts. This letter identifies specific examples of the parallel efforts underway in the Sacramento region that may serve as useful references and opportunities for partnership as the state moves toward the implementation of the CAPTI investment framework.

Innovation, Sustainability, and Mobility

Strategies S1 and S2 in CAPTI aim to accelerate innovative and sustainable transportation options as well as support increased mobility through reinvestment in transit and active transportation modes. We encourage the state to partner with regions to identify opportunities to build flexibility into state and federal programs that will allow for testing and piloting of new ideas and concepts. At SACOG, we are committed to identifying and testing new approaches to improving mobility to help usher in the next generation of transportation solutions. From our Civic Lab program to the recent opening of the California Mobility Center, our region is eager to partner with the state as you look to signal a commitment to innovation through an evolution in state funding programs.

We also appreciate the state's acknowledgement of the need for additional funding for transit and active modes of transportation, particularly coming on the heels of the COVID-19 pandemic. SACOG is currently working on a Parks and Trails Strategic Development Plan to create an interconnected system of trails across El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba counties. This plan aims to link every community and the region's major parks with a network of trails that increase access to job sites, community amenities, and public spaces supporting recreational, social, and other activities.

CAPTI's commitment to rethinking and reinvesting in the state's rail and bus systems is imperative for helping the state achieve our climate goals. The SACOG region is home to 14 transit operators, both urban and rural, who are struggling with budget and service decisions amid major ridership declines and the need to accommodate physical distancing and new sanitation protocols. CAPTI makes an important acknowledgment of the need to support the recovery of public transit as part of the state's effort to combat the climate crisis. An effective regional transit system is a cornerstone of our region's 2020 MTP/SCS. Increases in transit services and ridership are needed to help the region meet our state-assigned target of a 19 percent greenhouse gas (GHG) reduction by 2035.

Even before the current pandemic, volatile funding sources, disruptive technologies, and increasing costs, are among the challenges to realizing the regional transit system needed to meet the MTP/SCS vision. To get ahead of these challenges, SACOG's Next Generation Transit Study is looking to reimagine public transit for the Sacramento region: how it is delivered and how passengers are served. This collaborative effort will shape a vision of the next generation

of transit for the region that includes strategies to integrate traditional transit services with new mobility options.

We encourage the state to continue to work on fare payment streamlining through the California Integrated Travel Project and specifically take into consideration the needs of the unbanked, those who do not have a credit card, and those who do not have disposable income to load onto a fare payment card.

Elevating Community Voices

Strategy S3 in CAPTI seeks to elevate community voices in how transportation projects are planned and funded. SACOG applauds the state's commitment to creating clear, accessible, and transparent entry points for community stakeholders. We urge the state to not only elevate community voice through public engagement, but to ensure that community engagement has the potential to shift decisions related to funding, programming, and planning.

Further we think it is critical that tools for measuring equity-based outcomes are derived from a collaborative effort among the state, regional, local, and community partners. We look forward to participating in opportunities to work with the state on the development of an Equity Index tool that identifies best practices for quantitative and qualitative methods for understanding needs and progress toward achieving equity-based outcomes.

As our region seeks to advance discussions on equity in land use and transportation decisions, the SACOG Board of Directors has convened a Race, Equity, and Inclusion Working Group. This working group will provide guidance to SACOG on embedding racial equity considerations into upcoming programs and projects. As this effort is just beginning, we look forward to working with the state to ensure we are equipping decision makers with opportunities to listen and learn from the experiences and input of Black, Indigenous, and People of Color (BIPOC), women, and other marginalized communities. Beginning this summer, SACOG is developing the Engage, Empower, and Implement Grant Program using our regional funding sources. This program will be aimed at advancing equity through investments in transportation planning and infrastructure projects that are generated by BIPOC and low-income communities.

Climate Leadership and Resilience

We are encouraged by the state's commitment to aligning Caltrans planning and programming activities with CAPTI's investment framework as described in **Strategy S4**. This is an important step towards advancing the state's climate goals and better linking state efforts with regional plans to reduce greenhouse gas emissions. MPOs like SACOG are in a good position as regional entities tasked with multimodal and integrated planning to help the state move toward a more holistic approach to addressing mobility challenges.

CAPTI's proposed approach to prioritizing zero-emission freight infrastructure is an important step toward helping our region address the need to improve our ambient air quality as heavy-duty diesel trucks make up 36% of our emissions. A strong recognition and plan to support zero emission freight will help us reach Clean Air Act standards. Additionally, the supporting

infrastructure can provide an opportunity for rural areas to stimulate their economies which in turn, will help mitigate against future development pressures.

SACOG also appreciates the actions described in **Strategy S5** to better link transportation system improvements with efforts to support climate resilience through conservation, restoration, and management of natural and working lands. With roughly 85% of the Sacramento region covered by rural lands and a booming agricultural economy, SACOG values rural communities, forests, and agricultural lands as critical to our economy, environmental health, quality of life, and the future of our region.

SACOG's Rural-Urban Connections Strategy, launched in 2007, is an effort to look at the region's growth and sustainability objectives from a rural perspective. The region's latest effort, funded through a Sustainable Agricultural Lands Conservation grant, is the development of a Coordinated Rural Opportunities Plan. This plan will outline a strategic investment framework to support and enhance our region's agricultural and working landscapes, with a particular emphasis on supporting the ecosystem services and co-benefits derived from these lands such as carbon sequestration and climate resiliency. Further, SACOG recently completed a regional transportation vulnerability assessment, in coordination with Caltrans District 3, that will help to inform future regional transportation investment decisions by identifying best practices and approaches to building climate resilience into transportation infrastructure based on likely climate risks such as flood, fire, and extreme heat. We encourage the state to work closely with regions and local governments to ensure project-level applications and strategies intended to inform future state funding programs consider the wide diversity of landscapes and communities throughout California.

Implementing Sustainable Communities and Regional Pricing Strategies

We applaud this framework for seeking to support local and regional innovations aimed at reducing vehicle miles traveled (VMT) through the actions described under **Strategy S6**. We believe it is going to be imperative to support innovative and collaborative VMT mitigation strategies while acknowledging that different approaches are going to be needed in different parts of the state. CAPTI's call for exploring VMT mitigation programs is important and will need the collective efforts of the state, regions, and local entities to identify how programs can be managed and evaluated to ensure VMT reductions are realized. We encourage the state to consider funding exploratory and pilot projects to determine the viability of VMT mitigation programs and their potential to reduce VMT.

We appreciate the state's commitment to convening a working group that includes local and regional partners charged with recommending pathways to implementing roadway pricing strategies. SACOG's 2020 MTP/SCS outlines a regional strategy for deploying a combination of facility- and mileage-based pricing designed to raise revenues and manage travel demand on the region's transportation system. This strategy is critical for helping us achieve our greenhouse gas reduction goals as well as raise sufficient funding to maintain the more than 20 thousand miles of roadways in our region. While CAPTI notes that the state's ongoing Road User Charge program is distinct from these efforts, we encourage the state to be a leader in

working with regions to explore how regional and state efforts can be coordinated to ensure the consistent and logical deployment of these programs across the state.

Please include in the slate of topics for any working group on pricing the need for reconsideration of constraints currently placed on deployment of pricing on freeway facilities, such as limitations on converting existing general-purpose lanes to priced operations. Further, we request that CalSTA consider how new priced capacity on state highways, such as the addition of express lanes, can remain eligible and competitive for state funding programs.

Regarding the use of revenues generated from pricing strategies, working groups ought to lead a discussion about how these revenues can be utilized to fund multi-modal investments related to the corridor, such as: enhancing transit service within the corridor; funding transit fare subsidies for passenger services in the corridor; or development or enhancement of bike or pedestrian facilities within the corridor. CalSTA should also use these discussions to generate ideas for how to make Caltrans a stronger partner with regions by proposing ideas to prioritize transit on the state highway system with local and/or regionally-controlled funds, accelerate and streamline the processes by which design-exceptions for innovative or right-sized projects are considered, and supporting concepts such as bus-on-shoulder, as proposed by AB 474 (Mullin). Finally, and critically, the impact that roadway pricing may have on BIPOC individuals and communities, and options for both minimizing negative impacts and advancing equity in the areas affected by roadway pricing, should also be included.

We also believe collaboration with regional governments will be critical for CARB and SGC as they work to develop a guidance framework for prioritizing projects that advance the objectives of Sustainable Communities Strategies and the state's Scoping Plan. A collaborative approach is critical for this effort to ensure meaningful guidance that acknowledges the different barriers and local context that affect the successful implementation of solutions and projects in different parts of the state. Given the introduction of SB 261 (Allen) and SB 475 (Cortese) in the state legislature, both of which propose changes to SB 375 and are two-year bills, we encourage CARB and SGC to begin the dialogue with regional and state partners this summer to provide an opportunity for discussion in advance of the reconvening of the legislature in 2022.

Strengthening Transportation and Land Use Connections

Strategy S7 seeks to create stronger connections between land use and transportation policies. As land use decisions are a primary driver of travel behavior, this is a critically important part of helping to leverage public investments in transportation to further the objectives of CAPTI. The state has a great opportunity through its funding programs to recognize the efforts of local jurisdictions and regions that prioritize infill development and the production of housing in ways that also further equity and climate goals. As described previously, beginning with the Sacramento Region Blueprint nearly two decades ago, SACOG has significant experience developing integrated land use and transportation solutions that advance climate, equity, and housing goals. SACOG is also a leader in the state in our approach to coordinating our MTP/SCS development with the regional housing needs allocation process.

The SACOG region, like the rest of California, is in a housing crisis because we have not been able to build enough housing to keep up with demand. In particular, our region has struggled to build enough multifamily housing products in existing communities. Building more is critical to housing our region's service workers, teachers, and other working-class households as well as to promote racial equity and reduce residential segregation.

SACOG and local jurisdictions throughout our region are working together to find ways to overcome these challenges and advance pro-housing policies at the local level. Local and regional efforts can put in place a regulatory framework that reduces the barriers to building more infill multifamily and smaller-lot housing. SACOG's Green Means Go program is a regional strategy to address the barriers to infill development and seeks state support for funding to pay for the utility infrastructure needed to unlock infill and redevelopment opportunities throughout the region. The 2019-20 Budget Act requires the State Department of Housing and Community Development (HCD) to develop a designation for local governments to become "Prohousing" when they demonstrate policies and strategies to accelerate housing production by July 1, 2021. In turn, Prohousing jurisdictions will be awarded additional points or preference in programs such as the Affordable Housing and Sustainable Communities (AHSC), Transformative Climate Communities (TCC), Infill Infrastructure Grant (IIG) program and other state funding programs. Key Action S7.1 discusses using a similar framework for incentivizing location-efficient housing in competitive transportation funding programs. We are supportive of this approach and encourage the State to work with HCD to align the policies that will be rewarded in competitive grant programs.

Further, we are very encouraged by the state's interest in identifying anti-displacement strategies that can be incorporated into the decision-making process for public investments in infrastructure. We also appreciate the important acknowledgement of how transportation investments have created barriers and divided communities, particularly in historically BIPOC neighborhoods. The Sacramento region, with multiple major freeways converging within our urban core and highways that serve as main streets in our rural communities, has seen firsthand the type of impact transportation decisions can have on communities. The state's interest in prioritizing funding to begin to correct for the transportation investment decisions of the past is an important step in creating a more prosperous and equitable future that provides opportunity for all the state's residents. We think working with regional and local partners as more specific strategies and tools are developed will be imperative to ensure that solutions are sensitive to community needs, preferences, and experiences.

Thank you for again for the opportunity to comment on the draft CAPTI. We look forward to continuing this conversation and engaging with the state on implementing this important set of strategies. If you have questions, please feel free to contact me.

Sincerely,



James Corless
Executive Director

cc: Ms. Kate Gordon, Chair, Strategic Growth Council
Mr. Darwin Moosavi, Deputy Secretary, CalSTA
Mr. Toks Omishakin, Director, California Department of Transportation
Mr. Gustavo Velasquez, Director, California Department of Housing and Community
Development
Mr. Mitch Weiss, Executive Director, California Transportation Commission