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

Subject: SANDAG Comments on the Draft Climate Action Plan for Transportation Infrastructure

Dear Secretary Kim:

The San Diego Association of Governments (SANDAG) commends the California State Transportation Agency (CalSTA) for developing the Climate Action Plan for Transportation Infrastructure (CAPTI). Bold action requires bold leadership and this guidance is a great step forward to building a state transportation network that reduces single occupancy driving, increases multimodal options for all communities, and equitably meets the state's climate goals.

The vision for the future of mobility in the San Diego region directly aligns with these goals by reimagining how people and goods move in the 21st century. SANDAG is applying key strategies—known as the 5 Big Moves—to implement a balanced transportation network that gets you where you need to go quicker and easier, increases access, and meets state greenhouse gas emission reduction targets. The result is a comprehensive network that leverages technology to create a safe, adaptable, and socially equitable transportation ecosystem that responds to the unique needs of the diverse communities throughout our region.

Many of the strategies included in CAPTI align with this approach and we look forward to partnering with CalSTA, Caltrans, and all of our partner state agencies to ensure that our regional priorities complement that of the state. For us to be successful, it is critical that we not only all speak with one voice but also move in one direction.

With this in mind, SANDAG offers the following feedback for your consideration.

Strategy 1 – Cultivate and Accelerate Sustainable Transportation Innovation by Leading with State Investments

SANDAG appreciates the recognition by CalSTA that the eligibility requirements and scoring criteria for existing transportation funding programs may not currently align with the more innovative, future-facing mobility projects needed to meet our regional and statewide objectives. As we work to identify more effective and holistic solutions to moving people and goods around the San Diego region, we increasingly find it difficult to identify the resources needed to support non-traditional activities, like the integration of technology and resiliency into our transportation projects. We look forward to working with the state funding agencies to develop future guidelines that allow for the flexibility needed to support more innovative, multimodal, sustainable transportation solutions.

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To help advance this effort, we encourage CalSTA to consider:

S.1.1: Expanding beyond rail, transit, active transportation, and highway projects, to ensure that technology and emerging/on-demand mobility options are also eligible to receive funding. On-demand mobility not only expands access to traditional transit, but in some cases, expands beyond first/last mile connections, fulfills transit trips, and encourages pooled rides, which ultimately reduces Vehicle Miles Traveled (VMT) and congestion. In addition, active transportation projects should account for newer mobility devices, such as e-scooters, which depend on supportive infrastructure to enhance safety and promote alternatives to driving a car.

S.1.4: Including “improving freight system resiliency” as an evaluation criterion under the Trade Corridor Enhancement Program (TCEP). Broadening this action to evaluate TCEP projects based on how they incorporate climate adaptation or mitigation strategies will better reflect freight infrastructure needs across the state.

S.1.4: Partnering with the California Energy Commission (CEC) and California Air Resources Board (CARB) on additional funding opportunities beyond TCEP that combine infrastructure investments with vehicle deployments, similar to the CEC/CARB Zero-Emission Drayage Truck and Infrastructure Pilot Project program.

S.1.4: Prioritizing zero-emission vehicle infrastructure investments through SB 1 funding programs beyond TCEP.

Strategy 2 -- Support a Robust Economic Recovery by Revitalizing Transit, Supporting ZEV Deployment, and Expanding Active Transportation Investments

Expanding mobility options by revitalizing transit, supporting ZEV deployment, and increasing active transportation investments will directly contribute to economic recovery efforts and help to advance more equitable access to key destinations throughout the state. SANDAG has more than \$600 million of shovel-ready rail projects that could immediately provide benefits to the region and state with expedited funding cycles.

To help support this effort, SANDAG recommends that:

S.2.1: Contactless payment be provided at station platforms and integrated on-board for accessibility and enhanced rider convenience. Caltrans should also consider helping with mobile payment integration to allow for a seamless travel experience and help transit operators recover ridership.

S.2.4: A portion of Active Transportation Program (ATP) funding be designated for quick-build solutions that offer near-term implementation and pilot project opportunities in communities that have an immediate need for Vision Zero solutions.

Strategy 3 -- Elevate Community Voices in How We Plan and Fund Transportation Projects / Strategy 4 -- Advance State Transportation Leadership on Climate and Equity through Improved Planning & Project Partnerships

SANDAG appreciates CalSTA’s and Caltrans’ dedication to ensuring that those most impacted by transportation investments have a meaningful role in the planning processes. A key component of the SANDAG future transportation vision is to eliminate disparities and ensure that safe, healthy, accessible, and inclusive opportunities are available to everyone — with a specific focus on increasing mobility options for our most underserved communities. Over the past year, we have swiftly adapted to virtual engagement strategies with community-based organizations through our Regional Plan Social Equity Working Group and our Interagency Technical Working Group on Tribal Transportation Issues.

With this in mind, SANDAG recommends that:

S.3.1: The Transportation Equity and Environmental Justice Advisory Committee include a diverse range of community-based organizations representing disadvantaged and underrepresented communities across the state to ensure the various transportation equity and environmental justice needs are represented.

S.3.4: Caltrans partner with MPOs and RTPAs in the development of a set of common social equity metrics to support the new Equity Index and ensure a level of consistency across planning, evaluation, and implementation processes across the state.

S.4.1: Caltrans partner with regional agencies to develop the new data-driven approach for the Caltrans Strategic Investment Strategy. SANDAG has revolutionized our long-term planning process based on data science and analytics, providing a model on how the state and other regions can employ Big Data for transportation planning efforts.

S.4.4: Caltrans prioritize broadband deployment as part of its corridor planning efforts and facilitate middle mile fiber deployment by installing conduit in strategic corridors as a mobility strategy. Caltrans also should work to ensure consistent broadband policies and practices across all Caltrans Districts and incorporate fiber deployment into SHOPP projects and roadway maintenance programs as a matter of standard practice.

S.4.6: Caltrans consider incorporating near-zero emission freight infrastructure needs in the California Freight Mobility Plan (CFMP) and developing a statewide near-zero/zero emission freight infrastructure needs assessment to inform the CFMP.

Strategy 5 – Support Climate Resilience through Transportation System Improvements and Protections for Natural and Working Lands

SANDAG strongly supports creating a more resilient transportation system. Successful climate adaptation planning and implementation will depend on action at both the local and regional levels with guidance – and where possible, funding – provided by the state. In addition to planning for resiliency to be incorporated through future transportation improvements, CAPTI should go a step further to ensure projects that mitigate climate risks are eligible and prioritized for funding. Resiliency projects, such as rail line relocations and beach sand nourishment, are generally difficult to fund since they are competing against other statewide priorities.

Strategy 6 -- Support Local and Regional Innovation to Advance Sustainable Mobility

SANDAG welcomes the opportunity to participate in a dialogue with CalSTA and other key partners on how the state can support implementation of Sustainable Communities Strategies. In particular, we encourage CalSTA to consider best practices when developing a framework so that there is less reliance on modeling analyses and more reliance on what we know works. Our modeling tools have yet to catch up to the innovation around future mobility projects, often making it difficult to quantify the benefits of proven best practices.

In addition, at the passage of the landmark SB 375 in 2008, the Legislature cited the need for a “sustainable source of funding [to] accommodate patterns of growth consistent with the state’s climate, air quality, and energy conservation goals.” SANDAG encourages CalSTA to work with its partner agencies to identify funding that could be dedicated to metropolitan planning organizations for the specific purpose of accelerating transformational projects that will be needed to achieve state goals. The Alternative Housing Production Approaches proposal included in the Governor’s May Revise is an unprecedented step towards supporting this effort.

Strategy 7 -- Strengthen Transportation-Land Use Connections

In 2020, SANDAG established a Regional Housing program that leverages both state and federal dollars to incentivize production of affordable housing options within proximity to transportation options. SANDAG’s future vision relies on a fully integrated transit and land use scenario. In addition to the actions listed under this section, SANDAG requests consideration of the following concepts:

S.7.1: In addition to promoting reduced parking requirements, incentive programs should also consider the elimination of parking requirements near transit to further promote infill development, allow for transit-oriented-development, and encourage implementation of other parking management strategies such as unbundled parking.

S.7.3: When exploring the “Highways to Boulevards” Conversion Pilot Program, CalSTA and Caltrans should consider Complete Streets features that include multi-modal supportive infrastructure and amenities such as protected bike/micromobility lanes, bike repair stands, and secure parking for bikes/micromobility.

Closing

Again, SANDAG applauds Caltrans for this historic undertaking. The CAPTI framework includes a bold vision for how state investments can be prioritized to promote the climate and social equity. While not everything in this document will be easy to accomplish, the difficult policy conversations begin today as people are asked to balance what was promised in the past with what is best for the future.

As the San Diego region continues to hold these discussions, we support the State in taking this bold first step with the CAPTI. Thank you for your consideration of these comments. If you have any questions, please contact Robyn Wapner (robyn.wapner@sandag.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Hasan Ikhata". The signature is fluid and cursive, with a large loop at the end.

HASAN IKHRATA
Executive Director

HIK/RWAP/