



**METROLINK**

SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY  
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[metrolinktrains.com](http://metrolinktrains.com)

May 12, 2021

Mr. David S. Kim  
Secretary  
California State Transportation Agency (CalSTA)  
915 Capitol Mall, Suite 350B  
Sacramento, California 95814

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

Dear Secretary Kim:

The Southern California Regional Rail Authority (SCRRA) has reviewed the draft Climate Action Plan for Transportation Infrastructure (CAPTI) and would like to offer the following comments:

Support for an Integrated Rail Network

We are encouraged that the CAPTI reiterates that one of the first guiding principles for the CAPTI Investment Framework should be “Building toward an integrated, statewide rail and transit network, centered around the existing California State Rail Plan that leverages the California Integrated Travel Project to provide seamless, affordable, multimodal travel options in all contexts, including suburban and rural settings, to all users.” At SCRRA, we have oriented our recently adopted Strategic Business Plan and our Southern California Optimized Rail Expansion (SCORE) program to fulfill this vision of a completely integrated network across Southern California and we appreciate the reinforcement of those positive steps at the state level. We request that resources be provided directly to local passenger rail operators to deliver the shared goals on vision of the guiding principle.

Need for Partnerships in Advancing Zero Emission Rail.

We are most encouraged that the draft CAPTI acknowledges the need for state support to advance zero emission technologies for passenger rail. We hope this leads to additional funding programs to support the development of these technologies through funding programs managed by the California Air Resources Board (CARB) and the California Energy Commission (CEC), among others contemplated. Traditionally, these funding programs have focused on private vehicles, transit buses and some seaport vehicles and respective supportive infrastructure. This focus on light to medium vehicles has led to the situation where the state of technology is not yet ready to meet the needs

of heavy-duty fleet vehicles and passenger trains. It would be unfair to the riding public to force the cost of this technology development on them – not to mention contrary to the State and SCRRA’s common goal for social equity.

We urge that CAPTI provide the basis to expand eligibility for passenger rail and the needed fueling and/or charging infrastructure to help SCRRA continue reducing emissions and achieve the zero emissions goals as identified in the [Climate Action Plan](#) adopted by the Metrolink Board of Directors in March 2021. SCRRA has made the evolution toward zero emissions the North Star goal and is eager to continue down this path by participating in pilot projects and through our support for the ZEMU project slated to commence in San Bernardino County.

### Metrolink as a Beneficial Partner in Climate Action

Agencies such as Metrolink can be beneficial partners to the State in achieving the climate action goals equitably and can leverage investments with other federal and private funding sources. Older gasoline-burning private cars will remain on California’s roads for decades to come, especially for less affluent “long-haul” commuters who can’t afford a new car or a home closer to work. Metrolink is well positioned to help with this issue by providing these residents a compelling alternative to driving. Metrolink regional rail service allows people to affordably live where they want and still work in the greater Southern California region’s jobs-rich areas. Investment in Metrolink, including capital, state of good repair, and long-term operations and maintenance support, represents a simultaneous investment in economic opportunity and VMT reduction to accomplish the state’s climate goals. In fact, in Fiscal Year 2019, the last full pre-COVID-19 year recorded, Metrolink removed 339 million vehicle miles traveled from Southern California roadways. This yielded a net reduction of 130,000 metric tons of CO<sub>2</sub> equivalent greenhouse gases.

### Support for Local Approaches

We encourage CalSTA and the California Transportation Commission to recognize the importance of providing proper support to local transit agencies and governments to build up towards these goals, instead of imposing top-down approaches. Local entities should continue to lead implementation and in establishing funding priorities and pursuing federal funding to implement them – not the State. Local agencies are intimately knowledgeable with the situation on the ground, can establish targeted priorities that leverage their respective strengths and that contribute to the State’s overarching goals. The state should support those efforts rather than attempting to make those determinations and lead all funding applications as currently stated in the draft plan.

Additionally, we respectfully request the State’s consideration and support to protect the intent of existing law, including SB1, and keeping promises to our voters on local sales

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tax measures. It is vital that these funds not be diverted from critical infrastructure needs.

Thank you for the opportunity to comment on CAPTI. We look forward to our continued partnership with CalSTA on our shared priorities in the region. Metrolink has been a leader in the reduction of VMT and resultant emissions to improve the health of our local communities. We look forward to leveraging the everyday benefits of regional rail with supportive goals of CAPTI, and urge you make the necessary adjustments to evolve the Plan into one we can collectively get behind.

Should you have any questions, please feel free to contact me at (213) 452-0468 or via e-mail at [MclntyreT@scrra.net](mailto:MclntyreT@scrra.net) or Roderick Diaz at (213) 452-0455 or via e-mail at [DiazR@scrra.net](mailto:DiazR@scrra.net).

Sincerely,



Todd McIntyre  
Chief Strategy Officer

Cc: Ms. Hilary Norton, Chair, California Transportation Commission