May 10, 2021

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

RE: SCTA comments on the Draft Climate Action Plan for Transportation Infrastructure (CAPTI)

Dear Secretary Kim:

Thank you for the opportunity to comment on the Draft CAPTI framework. We understand and appreciate Governor Newsom’s goal to reduce greenhouse gas emissions (GHG) and vehicle miles traveled (VMT) and fully support additional investments in public transportation and active transportation projects. CAPTI serves as an important strategy to work collectively on those efforts. While the Sonoma County Transportation Authority is in strong support of addressing climate change in the transportation sector and appreciates your leadership on this issue, success will require creative, flexible, and pragmatic solutions to account for the unique opportunities and challenges that face each corner of the State.

As you may know, SCTA has a sister agency the Regional Climate Protection Authority (RCPA) and together we have been working for more than a decade to provide more active transportation options, shift people away from single occupancy vehicles, deploy electric vehicles, and support expanded transit options. The SCTA goal in our updated Countywide Transportation Plan is zero emissions from transportation by 2050 and our RPCA goals include achieving carbon neutrality by 2030. In addition, our recently voter-approved ¼ cent transportation sales tax measure dedicates a minimum of 35% to transit operations and active and alternative transportation modes and another 27% to multi-modal projects. We are a multimodal agency not just in word but also in how we allocate funds.

We are however concerned that the CAPTI strategy may not support critical local highway safety and congestion relief improvements that may necessitate some highway capacity projects in order to accommodate emergency evacuation routes, goods movement traffic, transit travel times, and employees who are currently commuting to jobs with no transit options. These improvements must be delivered in partnership between the State, regional and local partners and oftentimes rely upon State competitive grants for delivery. Given the North Bay’s unique geography, smaller population centers, vast agricultural farmland, and tourism traffic, we must continue to accommodate all modes of travel even while we continue to work toward reducing GHG emissions. As such, our county requires continued State investment in interchange and access improvements on Highway 101 and major investment in the State Route 37 corridor.
Regional flexibility and regulatory relief for rail, bus and active transportation is imperative to supporting a balanced multi-modal transportation system that will meet our mutual goals of reducing greenhouse gas emissions, reducing fatalities and injuries, and enhancing mobility. Our suggestions are as follows:

1. **Support regional flexibility**
   State funding programs should provide flexibility to regions so that they can address all modes as efficiently as possible to maximize safety, mobility, goods movement, and throughput in order to expedite the response to climate change. We support a geographically sensitive approach to CAPTI in recognition that there are small urban/rural areas that still need to plan, fund, and deliver projects that address safety and congestion along lifeline routes such as Highways 37 and 101. Improving roadway safety by reducing injuries and fatalities on our State highways is a key priority for both regional and state agencies. These projects will include new interchanges, such as the Hearn Avenue Interchange project. It is important to not exclude such safety improvements from SB 1 funding programs if our Vision Zero goals are to be met.

Rather than prioritizing non-capacity inducing projects on the state highway system, we suggest that state funding programs, particularly the SB 1 competitive programs – Local Partnership Program, Solutions for Congested Corridors, and Trade Corridor Enhancement Program – provide greater flexibility to address all modes, such as more funding for grade separations, passenger rail, or active transportation projects, so that State resources are flexible and are used as efficiently as possible to maximize safety, mobility, and throughput in order to expedite the response to curbing climate change.

2. **Support additional strategies that reduce greenhouse gas emissions**
   The pandemic has shown that telework can be effective tool in reducing travel while maintaining the productivity needs of employers and employees in many industries. We request that CalSTA include two additional strategies:
   - Expanded investment in broadband, particularly in underserved areas, to support enhanced telecommuting.
   - Support for local implementation of transportation demand management strategies, vanpools and park-and-ride lots, and VMT-mitigation credits.

We also support the Governor’s direction through N-79-20, and the proposed $1.5 billion in the FY 2021-22 State Budget, to invest more into zero-emission infrastructure and ask that low-income residents in the Bay Area be considered a priority for rebates for zero-emission vehicle (ZEV) purchases and charging infrastructure as a critical opportunity to help the region realize its air quality and mobility goals. These strategies should be a key part of the CAPTI whose ultimate goal is not just to reduce vehicle miles travel but also to reduce greenhouse gas emissions. The focus on vehicle miles traveled alone could have the unintended consequence of exacerbating the problem for disadvantaged communities where driving is the only option.

3. **Support the will of the voters and the value of State and local partnerships**
In 2020, 71% of Sonoma voters approved Go Sonoma, a ¼ cent, 20-year local sales tax measure that makes multimodal improvements throughout the county, including some that will support the State highway system. These measures require comprehensive public engagement, contain diverse investments in multimodal options, and required a 2/3 vote for passage. Our agency has made a commitment to the voters and our public to deliver the investments that our expenditure plan promised. A key part of keeping our promises is to secure State matching funds and foster a true partnership with the State.

In 2017, the legislature enacted SB1 to address mobility, safety, and congestion, in addition to maintaining infrastructure. SCTA advocated for the bill; in 2018 SCTA opposed Proposition 6 (the repeal of SB 1) and supported Proposition 69 (protecting SB 1). It is important to support the intent of the voters in order to maintain the public trust, by preserving all of the modes supported in the enactment of SB 1.

Thank you for the opportunity to provide feedback on the Draft CAPTI proposal. The SCTA is an eager partner in combating climate change and delivering more multi-modal options, but we ask that state investments be responsive to the unique needs and characteristics of each region: urban and rural, valley and coastal. We look forward to partnering with you and the appropriate state agencies to develop pragmatic solutions to meet the objectives articulated in the Executive Orders and providing additional input on the development of CAPTI.

Sincerely,

Suzanne Smith
Executive Director, SCTA/RCPA

CC: Senator Bill Dodd
    Senator Mike McGuire
    Assembly Member Marc Levine
    Assembly Member Jim Wood
    Assembly Member Cecilia Aguiar Curry
    Toks Omishakin, Caltrans Director
    Dina El-Tawansy, Caltrans District 4 Director