



**San Francisco  
County Transportation  
Authority**

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May 19, 2021

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

**SUBJECT:**

Climate Action Plan for Transportation Infrastructure - Comments

Dear Secretary Kim,

Thank you for your leadership in developing CalSTA's innovative *Climate Action Plan for Transportation Infrastructure* (CAPTI) for California. We appreciate the opportunity to provide comments on this forward-thinking, holistic framework to advance Governor Newsom's recent Executive Orders and realize California's ambitious climate goals. Similar to the state, San Francisco's transportation sector emissions account for about 40% of overall greenhouse gas emissions. We continue to pursue our Transit First strategy to reduce this impact and there is high alignment between CAPTI and our local approach. The CAPTI also positions California well for historic Federal investment programs proposed by the Biden Administration. For these reasons, the San Francisco County Transportation Authority is pleased to support the strategies in the *Climate Action Plan for Transportation Infrastructure* to reduce greenhouse gas emissions, promote equitable transportation, and build resilient communities. Specifically:

- We appreciate the proposal to **refocus existing state resources to advance climate goals, including SB 1 programs and the Interregional Transportation Improvement Program (ITIP). The state must also secure significant new funding** to develop California's integrated, statewide rail and transit network, invest in networks of safe and accessible bicycle and pedestrian infrastructure, and implement vehicle demand management strategies that reduce congestion, prioritize efficient modes, improve traveler reliability, and potentially generate fee revenue for re-investment in equitable access and sustainable travel options.
- We strongly support the proposal to **accelerate Transit and Intercity Rail Capital Program (TIRCP) cycles and identify other funding for the electrification of transit fleets, including both vehicles and the necessary facility upgrades.** We also request the state to consider amending Carl Moyer Program guidelines to increase flexibility and allow their use for both replacement and expansion vehicles. Fleet electrification must happen concurrently with efforts to increase transit capacity and reduce vehicle miles travelled (VMT), so we support maintaining the state's commitments to other TIRCP priorities.
- Thank you for the state's leadership in **advancing equity, including through the establishment of the Transportation Equity and Environmental Justice Advisory Committee(s) and the California Transportation Commission's Equity Advisory**



**Roundtable. Improved planning and project partnerships, particularly comprehensive planning grant programs**, also continues to be a need in San Francisco, where the risk of displacement remains high due to the high rent burdens here and in the Bay Area. We are mirroring the state's important dialogues with equity groups at the local level in our countywide long-range transportation planning and for key initiatives, particularly around pricing and demand management. We believe it will be important to support deep and inclusive community engagement with diverse communities and note the importance of planning grants and project capital priorities even in larger cities like San Francisco where we are proud to lead the region in producing and preserving affordable housing near transit nodes. At the same time, we must also address existing disparities, build trust, address past harms and stabilize communities undergoing gentrification.

- In the area of roadway pricing, we very much support and appreciate the **new state Roadway Pricing Working Group which seeks to outline statutory and administrative opportunities and barriers to equitable implementation of various roadway pricing applications currently under consideration by local and regional partners**. We are interested in serving on the working group and believe we can contribute as well as learn from others as we share our experience in implementing a tolling program for Treasure Island and Yerba Buena Island, studying cordon pricing for our downtown area, and evaluating equity considerations for future carpool or express lanes on US-101 and I-280 North in San Francisco.

We have included detailed comments on the Public Discussion Draft (March 2021) as an attachment to this letter. Please feel free to contact Amber Crabbe, Public Policy Manager ([amber.crabbe@sfcta.org](mailto:amber.crabbe@sfcta.org), (415) 522-4801), with any questions or to further discuss how we can support CalSTA in its climate change action.

Sincerely,

A handwritten signature in blue ink that reads "Tilly Chang".

Tilly Chang  
Executive Director



**Detailed Comments, Climate Action Plan for Transportation Infrastructure (March 2021 draft)**

Page	Comment
8	The second paragraph notes “Car ownership has become an expensive necessity for many low income Californians...” In fact, transit is also expensive for low income Californians as well. The state could take leadership in supporting means-based transit fare programs and making it easier for low income residents to purchase electric bicycles, which can serve a broader range of trips than traditional bicycles and can be attractive to those who wouldn’t usually choose to bike.
11	We appreciate the state’s continued focus on SB 1’s commitment to a fix-it-first approach while seeking ways to advance climate goals and investments within the statutory requirements of the funding program.
13	We appreciate the intent to better align the ITIP with the state climate goals, in particular with respect to intercity rail, which has not historically been prioritized within the ITIP. We would like to see the Intercity Passenger Rail corridors consider not just the rail links between regions but key intercity links within regions such as the extending Caltrain and future High Speed Rail to the Salesforce Transit Center in San Francisco.
14	We concur with the statement “these funds alone cannot fully meet the investment needs to achieve our state’s climate change goals.” CalSTA must prioritize securing more funding for transportation and directing it to projects that reduce VMT and advance equity. In addition to raising state funding, CalSTA could advocate for federal funding, including rewarding states or cities that pass local funding measures (e.g. a Federal Local Partnership Program) or support “self help” revenue measures at the regional and local levels.
14	As stated here, the connection between land use and transportation is critical, and the link between transportation and housing is even more pronounced. The affordable housing crisis, in particular, pushes residents outside the urban core to seek housing they can afford, resulting in VMT increases. We suggest adding a reference to advancing affordable housing in this section (in addition to furthering compact development, low-VMT, high opportunity neighborhoods). We further suggest that in addition to joint meetings with ARB and SGC, CTC and Caltrans closely coordinate with other state agencies working on affordable housing to identify how transportation can most effectively support the development and implementation of affordable housing.



15 - 16	We recommend discussing here or somewhere else in the plan the impact and mitigations needed for emerging modes of travel, in particular Transportation Network Companies (TNCs) and autonomous vehicles. CARB's Clean Miles Standard findings show that TNC vehicles are found to have greater emissions than the general fleet. Our agency's own research has shown that TNCs have contributed significantly to the increase in congestion on San Francisco's roads. Autonomous vehicles have the possibility of pushing growth further away from job centers, further increasing VMT and working at cross-purpose to CAPTI goals. Meaningful targets need to be set for TNCs and emerging AV passenger service, both with respect to fleet composition and efficiency. State agencies and local jurisdictions need access to the data collected by CPUC and the DMV on these modes in order to evaluate their evolving impact on emissions and VMT.
15	We suggest the principle of investing in bicycle infrastructure could also include means-based subsidy programs to increase access to electric-bicycles, in particular for low income families.
16	For the EV infrastructure principles, we recommend that in addition to more rural or remote communities, the state also prioritizes accessibility in low income and disadvantaged communities, including in larger metro areas. Strategies to do so could include means-based incentives for the purchase of new or used zero emission vehicles or electric bicycles, and policies that ensure electric vehicle infrastructure such as charging stations are accessible in lower income and disadvantaged communities.
16	We strongly support the principle of promoting projects that do not significantly increase passenger VMT, in particular "consider alternatives to highway capacity expansion, such as providing multimodal options in the corridor, employing pricing strategies, and using technology to optimize operations." We are currently studying many of these approaches in San Francisco, including a Downtown Congestion Pricing Study that has focused on equity outcomes, and planning for a future express lanes project on US-101/I-280 that not only integrates tolling and transit service in a single scope of work but is also looking at converting a general purpose into an express lane. Implementing these innovative solutions will rely on state funding and Caltrans partnership, as well as state authorization. We also suggest adding TDM as another strategy to decrease VMT in travel corridors.
16	We would like to ensure that the principle of developing an EV freight system considers ways to electrify last mile delivery vehicles that circulate on local roads as well.
18	S1.3: In addition to fast tracking Caltrans' corridor planning for new CAPTI-aligned projects, the state should consider providing funding to advance planning and design at the local and regional level in order to develop a pipeline of projects for ITIP, AHSC, and other state funding sources.



20	S2.3: We strongly support accelerating TIRCP cycles and identifying other funding to support deployment of ZEV transit/rail fleets, including vehicles and facility upgrades. All transit operators, large and small, are in dire need of funding to help comply with the ARB's Innovative Clean Transit regulation. The costs of purchasing ZEBs, building the infrastructure necessary to deploy them, and procuring electricity to operate them exceed that of more traditional vehicles and infrastructure. San Francisco is committed to electrify our bus fleet, but, like most other transit operators, have not identified full funding. State support through TIRCP and other funding programs will help get clean transit vehicles on the street sooner. EV ferry and landside charging infrastructure should also be eligible to receive these funds.
20	S2.4: We would welcome a State Highway Account grant program to match locally-funded active transportation investments, which would demonstrate state commitment toward active transportation, in particular to increase bicyclist and pedestrian safety.
21	S3: In order to support community planning for transportation and resiliency projects, we suggest that the state could grow the SGC's Transformative Climate Communities program, or institute a similar program focused on transportation at CTC or Caltrans.
21	S3.1: Consistent with best practices, we recommend compensating community members for their time serving on committees or participating in ongoing advisory efforts.
24	S5: We support a more comprehensive approach to ensuring resilient state and local transportation systems and considering adaptation strategies either as part of a transportation project or as a stand-alone project eligible to receive state funding. In San Francisco we have several critical resiliency projects, including the Embarcadero Seawall, a master plan of improvements for Ocean Beach, and protections for the Muni Subway and BART Transbay Tube portal. State transportation investments in these projects could leverage millions in federal and local funding.
25	S6.2: We strongly support convening a roadway pricing working group to provide state support for implementation of local and regional efforts. It is critical that local and regional agencies are represented on the working group, and we would like to request to be a participating member.
26	S7.1: We support this strategy, and support committing additional funding to programs such as the SGC's Affordable Housing Sustainable Communities program, with funding focused on transportation infrastructure. Adding a related evaluation criterion to state grant programs would also encourage local jurisdictions to prioritize projects that support infill housing near transit, since every point scored counts in competitive programs.
27	S7.3: We support the proposed "Highways to Boulevards" conversion pilot program. The state could provide direct funding for the program, as well as advocate for a federal program to support these projects that would revitalize neighborhoods and reunite communities.



28	<p>Tracking progress, such as through annual progress reports, is critical to document accomplishments and understand how the strategies in the plan are being implemented. However, simply tracking implementation is insufficient. The state must also track outcomes of these actions through monitoring and evaluation and/or research programs and use clear metrics to determine their impact on climate goals. The recent CARB Clean Miles Standard process is an example of a process that, through data-driven methods, established that TNC emissions were higher than the general fleet and identified the need for regulatory targets to improve emissions within the TNC fleet.</p>
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