



SPUR

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Secretary David Kim
California State Transportation Agency

April 28, 2022

RE: Letter in Strong Support of the State's Climate Action Plan for Transportation Infrastructure (CAPTI)

The State's Climate Action Plan for Transportation Investments (CAPTI) is a critical and necessary step towards helping California meet its climate and equity goals. SPUR is particularly supportive of aligning all the state's discretionary transportation funding decisions around achieving these essential goals, including funding programs controlled by the California Transportation Commission (CTC). Given the potential influx of federal transportation funding over the coming months, with the hoped-for passage of the American Jobs Plan and Surface Transportation Reauthorization, there is a real urgency to not only finalize CAPTI but execute on its recommendations.

For too long, the state has funded transportation infrastructure investments that work at counterpurposes to the state's climate, equity and fiscal goals. These investments increased greenhouse gas emissions and air pollution, disproportionately impacted low income and BIPOC communities, contributed to the high levels of deaths and serious injuries on our roads and poor public health outcomes, and generated unfunded long-run maintenance obligations.

The need for the state to line up its transportation infrastructure investments with its climate and equity goals has only become more urgent in recent years, as greenhouse gas emissions from the transportation sector have continued to grow and now represent over 40% of all emissions in the state. Although switching to zero-emissions vehicles is an essential strategy, deployment of zero-emissions vehicles alone is not sufficient to meet our state's climate goals. The California Air Resources Board (CARB) has clearly documented, including in its most recent 2020 Mobile Source Strategy, that the state needs to reduce the vehicles miles travelled per capita to meet its climate goals even under the most aggressive zero-emission vehicle deployment scenarios.

CAPTI clearly lays out a framework, in seven strategies, under which the state can work to mobilize its discretionary transportation spending to reduce climate emissions and inequities caused by our transportation system. SPUR would also like to commend CalSTA and the inter-agency working group on its extensive, thoughtful and comprehensive public outreach process.

As CAPTI moves from draft to final, SPUR would encourage the state to fully align its discretionary transportation funding with its climate and equity goals -- the only “where feasible” standard is too loose a standard for such critical state policy goals. SPUR also makes the following additional and more specific comments:

Strategy 1

SPUR enthusiastically supports CTC updating its Solutions for Congested Corridors Program (SCCP) guidelines and scoring criteria to prioritize projects that provide travelers with options other than driving alone and reduce vehicles miles travelled. Projects that include strategies that enable drivers to internalize the cost that driving impose on our communities, generate revenue to invest in sustainable transportation options, and disproportionately benefit disadvantaged communities, should be encouraged. SPUR is also supportive of prioritizing projects in the SCCP that help deliver walkable, transit-supportive, low-VMT and equitable communities.

SPUR would also like to see a similar commitment by the CTC to update its Trade Corridor Enhancement Program (TCEP) guidelines and scoring criteria to prioritize projects that advance the state’s climate, air quality and equity goals. Too often, trade corridor projects are prioritized for funding that increase truck traffic through disadvantaged communities that are already disproportionately burdened with the air pollution, safety and public health burdens of diesel truck traffic.

The CAPTI framework largely focuses on actions that can be taken by state agencies under their existing authority. While that should be CAPTI’s primary focus, SPUR would like to see in the final CAPTI a sub-strategy that commits the state to inventorying the statutes that limit the ability of discretionary transportation funding helping meet the state’s climate and equity goals (eg statutes that limit the conversion of general purpose lanes to express lanes that prioritize buses and high occupancy vehicles), and force the money to be spent on projects that increase VMT, increase the state’s greenhouse gas emissions and exacerbate existing disparities.

Strategy 2

SPUR is particularly supportive of actions the state can take to support transit recovery.

SPUR is also particularly supportive of increasing funding to the Active Transportation Program (ATP). The ATP Program is the most over-subscribed discretionary transportation funding program; can be distributed broadly to communities and neighborhoods across the state; will generate immediate mobility, safety and air quality improvements; will create jobs immediately;

and will help support transit, VMT reductions and climate reductions. These investments can be specifically and easily targeted to disproportionately benefit disadvantaged communities, and have some of the strongest cost-benefits of any transportation improvement. SPUR would support prioritizing ATP funding from the state general fund given this year's surplus, from future flexible federal funding, from local contributions from existing programs with the state providing a match from the State Highway Account, and by taking contributions from other state transportation funding programs.

SPUR would like to see a clear commitment to prioritizing projects in state funding programs that get transit and very-high occupancy vehicles out of traffic, including in dedicated lanes and with signal priority. The evidence is clear that unless we get transit out of traffic it will continue to become more expensive to operate, less reliable, slower, and have fewer riders.

Strategy 3

SPUR is particularly supportive of elevating community voices, with a particular focus on incorporating the perspectives of disadvantaged communities. Further, we support ensuring community voices are incorporated into the planning, project delivery and maintenance processes throughout their development and delivery without relying on the public-input provisions provided as part of the environmental (CEQA) process. This work should build on the best practices in community-led transportation investment programs, such as the Transformative Climate Communities program developed by the Strategic Growth Council and the Community Based Transportation Plan program developed by the Metropolitan Transportation Commission.

Strategy 4

SPUR is particularly supportive of Caltrans aligning its Strategic Investment Strategy, Interregional Transportation Strategic Plan, State Highway System Management Plan and Caltrans Corridor Planning around state climate and equity goals. However, SPUR would like to see in the final CAPTI a commitment by Caltrans to develop and implement a Climate Action Plan with targets that are not only measurable and achievable, but which are in line with the state's own climate targets.

SPUR would also encourage the state in the final CAPTI to prioritize public health, especially in disadvantaged communities, in its freight planning and trade corridors funding. This must include considerations for zero-emissions vehicle infrastructure and deployment, but should also include addressing pedestrian and bicyclist safety, brake and tire wear emissions, emissions from the non-zero-emissions fleet, and the potential to re-routing freight traffic away from disadvantaged communities. The state should also prioritize community-led planning to reduce the impacts of

freight traffic and freight infrastructure on disadvantaged communities. The state should also explicitly prioritize investments in the freight network that directly benefit California's passenger rail system, especially where freight traffic can be moved off right of way shared with passenger trains.

SPUR would like to see in the final CAPTI, a clear commitment as part of Caltrans corridor planning efforts to plan for prioritizing transit, high and very-high occupancy vehicles on state-owned right of way. To build fast, reliable and efficient express bus networks quickly and cost-effectively, the state needs to be incorporating transit priority in as many of its highway improvement projects as possible -- from direct access ramps for HOV or HOT lanes allowing transit and very high-occupancy vehicle to enter without having to shuffle across congested traffic lanes, to queue-jump lanes on highway on-ramps and off-ramps, to bus-on-shoulder treatments and more.

SPUR is encouraged to see a commitment for Caltrain to re-examine and revise its own processes, procedures and guidance that local agencies have sometimes identified as a barrier to advancing sustainable transportation. However, SPUR would like to see in the final CAPTI this commitment elevated to a Key Action under Strategy 4, with a particular focus on how Caltrans can reduce the time and cost of delivering both active transportation projects and projects that provide uncongested travel to transit and high or very-high occupancy vehicles on state-owned right of way. In the Bay Area, for instance, a project to convert a 4 lane state-owned right of way into a 2 lane road with a middle turning lane and 2 bike lanes has required over 13 separate Caltrans studies, assessments and reports.

Strategy 5

SPUR enthusiastically supports incorporating climate risk assessment as a standard practice in the transportation project development process.

Strategy 6

SPUR particularly supports convening a roadway pricing work group, focused on equitable roadway pricing, that will hopefully also include non-government stakeholders. Various form of roadway pricing have been identified in both the California Transportation Plan (CTP) 2050, and in numerous Sustainable Community Strategies around the State, as one of the central greenhouse gas and VMT reduction strategies, as well as a key way to generate revenue to provide more sustainable mobility options whose benefits should be targeted at the most disadvantaged communities. This is particularly true in the Bay Area, where the current draft of Plan Bay Area 2050 envisions congestion pricing in downtown San Francisco, completing a

regional network of express lanes with a focus on general-purpose lane conversion, and ultimately implementing all-road tolling on the region's most congested highways with robust transit alternatives. It is critical that any roadway pricing strategy is focused on delivering equitable outcomes, in its pricing strategy, in its fines and enforcement strategy, and in how the revenues from the project are spent.

SPUR also supports the development of a framework to evaluate whether a particular project or set of projects aligns with the goals of SB375, achieves the objectives of the Scoping Plan or helps deliver on the climate and equity goals of a regions' sustainable community strategy. Just because a project is included in a Regional Transportation Plan (RTP) or SCS does not mean that the project itself advances the RTP or SCS's climate or equity goals. Given the complex interaction between projects in the RTPs and SCS in the same corridor or in the same community, SPUR encourages the state to explore the option of having willing MPOs be able to extend and deepen this evaluative framework under state guidance or approval. SPUR hopes that non-governmental stakeholders will be included in the development of this framework, and that the framework will ultimately be used to prioritize projects for federal, state and local funding.

On the other hand, SPUR would be cautious about implementing VMT mitigation banks and urges the state to learn from the mistakes made in implementing similar project-based offset programs in cap-and-trade programs around the world. Many of these programs ultimately failed given the challenges of ensuring equitable outcomes and proving additionality (that a particular environmentally-beneficial project would not have gone forward in the absence of the funding provided by its sale of environmental-credits). It would not help to meet the state's climate or equity goals, if highway expansion projects that disproportionately burdened disadvantaged communities were allowed to move forward because they took credit for VMT mitigation actions already underway in wealthier communities who suffered less from environmental burdens.

Strategy 7

SPUR applauds CAPTI's focus on strengthening transportation-land use connections. SPUR is particularly enthusiastic about using transportation funding programs to reduce VMT by incentivizing infill development, and prioritizing transportation projects for funding that incorporate robust anti-displacement strategies. However, it is important that transportation investments prioritize the production of affordable housing in infill locations in addition to market rate housing. In addition, it is important the transportation investment prioritize not just the development of transit-adjacent housing, but prioritize the walkable, amenity-rich, low-parking, affordable transit-oriented communities that truly reduce VMT. Adopting a 15-minute neighborhood framework, for instance, as well as other urban design and transportation demand

(TDM) best practices would be an important addition to a prioritization framework centered on the number of new infill units built.

SPUR encourages the state leverage transportation investments in existing transit systems, not just for new transit systems or transit systems extensions, to incentivize affordable infill housing production and the creation of low-VMT transit-oriented communities. SPUR also encourages the state to explore both prioritizing projects based on infill housing and adoption of low-VMT best practices, and setting a minimum standard of infill housing and low-VMT best practices that have to be met to be eligible for funding. Setting minimum standards has been particularly successful both in MTC's TOD Policy (Resolution 3434) as well as in numerous transit agency TOD Policies at BART, WMATA and elsewhere.

SPUR also enthusiastically supports a Highways to Boulevards pilot program. SPUR would encourage the prioritization of new state and federal funding for this program, as well as the repurposing of portions of existing transportation funding programs that have had the most damaging impact on low income and BIPOC communities to be deployed reparatively to tear down the highways that have torn up too many of these communities. It is essential that any Highways to Boulevards program centers equity by being community-led, putting in place and funding robust anti-displacement strategies in surrounding communities, and prioritizing the reclaimed land for community-serving uses such as affordable housing. This program should also create boulevards that prioritize buses, bicycles and pedestrians and active uses.

Tracking Progress

SPUR supports the clear commitment in CAPTI to regular evaluations, and for annual updates to CAPTI's recommendations. However, SPUR would like to see in the final CAPTI a clear commitment to detailed annual tracking and reporting of the extent to which each of the state's discretionary transportation investments, including investments for which the CTC is responsible, support the state's climate and equity goals as well as the RTP and SCS's goals. It is not enough to track the progress on implementing the strategies, the state should be tracking progress on how discretionary transportation funds are actually being spent.

We look forward to further opportunities to engage in and support the important work you are doing to align the state's transportation funding with its climate and equity goals.

A handwritten signature in black ink that reads "Nicholas Josefowitz". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Nick Josefowitz
Chief Of Policy, SPUR

cc:

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