



October 31, 2024

Secretary Toks Omishakin
California State Transportation Agency
400 Capitol Mall, Suite 2340
Sacramento, CA 95814

Re: Public Comments on Draft Climate Action Plan for Infrastructure (CAPTI) Actions Update

Dear Secretary Omishakin:

The Central Coast Coalition (CCC) is thankful for CalSTA's leadership on the Climate Action Plan for Transportation Infrastructure (CAPTI). The CCC supports the State's goals to aggressively combat and adapt to climate change while supporting public health, safety, and equity.

Our Coalition participated in the September public workshops on the next update to CAPTI and would like to provide the following feedback on the Draft Action Ideas presented in September.

Overall, we request that any updated CAPTI Action Ideas or recommendations not be applied to the Senate Bill 1 Cycle 4 evaluation process. The California Transportation Commission (CTC) approved the SB1 Cycle 4 guidelines in August 2024 following a robust public engagement process. Agencies will now be submitting applications in November based on those adopted guidelines. For agencies co-nominating with Caltrans, collaboration and nominations were based on CAPTI 1.0 and the Caltrans System Investment Strategy (CSIS). Modifying the process for applicants at this point would be detrimental to the process.

As we strive to partner with the state on mutual objectives of reducing greenhouse gas emissions and enhancing mobility options for all users, we ask that you consider the following perspectives and solutions for the four strategies that CAPTI 2.0 proposes:

Strategy 1: Transforming the Future of the State Highway System

While we appreciate the opportunity and vision to prioritize transit on the state highway system, adding additional fixed route service without ridership demand, under the current farebox recovery ratio requirements, and without additional resources to supplement existing service, is not feasible in our region.

The Central Coast, comprising the counties of Santa Cruz, Monterey, San Benito, San Luis Obispo, and Santa Barbara, has a population of 1.5 million. We do not have the same traffic volume as urbanized areas in the Bay Area, Los Angeles Basin, or San Diego, so managed lanes do not pencil out in our region. We would not have any excess revenue generation to dedicate towards multimodal options.

We appreciate efforts to incorporate climate resiliency planning to maintain the integrity of vital routes on the state highway system. These routes facilitate national goods movement and serve as lifeline routes and evacuation routes during natural disasters, particularly for disadvantaged communities that must rely on automobiles to go to work or seek educational opportunities. Multimodal investments are already included in CAPTI 1.0.

The Central Coast supports zero-emission infrastructure investments and additional funding for zero-emission freight and transit vehicles. We have been diligently working with Caltrans to install regional charging stations. Solutions for compelling mode shift in our region should focus on enhancing or establishing passenger rail service, such as augmenting LOSSAN or Metrolink service and providing connectivity between San Luis Obispo and Gilroy, where service does not exist.

Strategy 2: Reducing Greenhouse Gas Impacts of Transportation Investments

The state must consider areas where capacity expansion is necessary to address climate adaptation and resilience or to close gaps in evacuation routes to prepare for natural disasters or other climate events. Highway 101 is the Central Coast's "main street," a critical arterial for most of the region, a lifeline and evacuation route, and is integral for interstate commerce. When Interstate 5 closes annually due to inclement weather over the Grapevine, Highway 101 becomes the only north-south arterial in the state. Other routes, such as State Routes 1, 17, and 25, serve a similar purpose of accommodating daily commuters and tourists to the region. East-west connectors such as State Route 46 and State Route 156 also provide access and throughput by completing gap closures, which is essential to help move goods and people safely.

Our region represents one of the most productive agricultural regions in the nation, if not the world. The Central Coast annually generates over \$50 billion in freight traffic. Fresh produce from the Salinas Valley cannot be delayed when processing or going to market. We have nearly 27 million registered drivers in this state, all of whom do not have the same travel destinations. The state's population has quadrupled since the highway system was built in the 1950s, which has exacerbated the challenge, particularly with 50% of all imports and exports in the nation moving through the Ports of Oakland and Los Angeles/Long Beach and utilizing the Central Coast's arterials to get goods to market. Our region also generates over \$5 billion annually from tourism, representing 40 percent of our local economy.

The CCC is supportive of improving vehicle miles traveled (VMT) analysis and mitigation guidance for rural projects to better account for the low VMT impact of many rural projects, which we hope will be the case with the enactment of SB 768 (Caballero), Chapter 773, Statutes of 2024. The Coalition, however, has concerns about updating the Trade Corridor Enhancement Program (TCEP) guidelines to impact the competitiveness of projects based on their VMT impacts. One size does not fit all in the State of California as small urban and rural regions lean on TCEP funding to help deliver critical freight and safety projects of regional and statewide significance. This change would be detrimental to areas like the Central Coast. While TCEP's statutory language clearly emphasizes that *freight emissions reductions* are the program's focus, this strategy would shift the focus of the program implementation to *passenger VMT mitigation* in contradiction of statute. Caltrans, CTC, and other state agencies have shifted their focus to VMT mitigation, but the statutory authorization for TCEP does not make that distinction and must continue to be implemented as a program focusing on freight emissions reduction.

Further, the CCC believes this strategy would give an undue advantage to urban ports, urban passenger VMT mitigation, and rail programs within the grant program at the detriment of other key highway freight corridor projects throughout the State. TCEP is one of the only state grant programs for freight corridor improvement and freight emissions reduction. Equitable competitiveness should be maintained for all statewide applicants.



The Coalition has similar concerns with updating the Solutions for Congested Corridors Program (SCCP) guidelines to impact the competitiveness of projects based on their VMT impacts. One size does not fit all in the State of California as small urban and rural regions lean on SCCP funding to help deliver critical multimodal corridor improvement projects of regional and statewide significance. Multimodal corridors aim to reduce VMT through a suite of improvements. When an applicant submits their SCCP applications, not all improvements in the suite are considered as they may be funded with other sources. Also, improvements may have different VMT results when not considered part of the complete suite.

Lack of density is an issue along the Central Coast. The San Francisco Bay Area has a population of 6.8 million over 7,300 square miles, Los Angeles County has 10 million people living over 4,700 square miles, the San Joaquin Valley has 4.3 million people spread out over 27,000 square miles, and the Central Coast has 1.5 million residents living over 18,000 square miles. The Bay Area has 4.5 times more people living in an area nearly one-third the size of the Coast. Los Angeles has more than 6.6 times the population in just a quarter of the area of the Central Coast.

The automobile represents the most viable access to educational, career, and recreational opportunities. It is often not feasible for Coastal residents to take public transportation or ride a bike to go to work or school or conduct daily activities, such as grocery shopping, taking children to soccer practice, or running other household errands. These realities make VMT reduction difficult in some cases. VMT reduction was not intended for rural or suburban areas.

Our region is putting maximum effort into providing multimodal options, and we are appreciative of awards received from the Active Transportation Program, Transit and Intercity Rail Capital Program, and the SB 1 competitive programs, which feature many multimodal components.

Our solution would be to create more funding opportunities rather than poach from existing resources to accelerate multi-modal objectives. Examples include increasing grant opportunities for zero-emission vehicles and infrastructure, recapturing truck weight fees, extending the Cap and Trade Program, and finding a successor source to the gas tax to stabilize funding.

Strategy 3: Delivering Equitable Outcomes

We fully support public outreach and inclusion of all communities to ensure that we are servicing the needs of our regional communities.

Strategy 4: Improving Transparency and Accountability

The Central Coast has four self-help counties with detailed multi-modal expenditure plans, of which some resources are dedicated to improving state assets, such as the highway system. We have a fiduciary responsibility to execute those plans and do not support the codification of the CAPTI principles since it would make our region less competitive to acquire state funding to leverage local and federal dollars to improve safety and throughput for our region.

We fully support engaging with all constituencies to ensure that our investments enhance safety and mobility for all.

Thank you for the opportunity to comment. We look forward to working with you.



Sincerely,

Marjie Kirn, Executive Director
Santa Barbara Association of Governments

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San Luis Obispo Council of Governments

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