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May 17, 2021

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

**Re: CAPTI Implementation Public Comment**

Dear Secretary Kim:

The Riverside County Transportation Commission (RCTC), both in its position as the regional transportation planning agency and as the administrator of a local voter-approved sales tax measure dedicated to transportation improvements in Riverside County, has participated in numerous briefings regarding California State Transportation Agency's (CalSTA) development of the Climate Action Plan for Transportation Infrastructure (CAPTI or Plan). As CalSTA developed the Plan's goals and strategies based on Governor Newsom's Executive Orders N-19-19 and N-79-20, RCTC staff provided feedback and comments to ensure the Plan could feasibly and equitably be implemented in growing suburban/rural regions like Riverside County.

RCTC supports CAPTI's efforts to reduce pollution and provide safe walking, biking, and transit access. Indeed, RCTC has led the way in many of these efforts within Riverside County. Our local sales tax measure, Measure A, funds improvements for all transportation modes, including on highways, public transit, rideshare alternatives, local streets, and even habitat preservation. Our residents have invested considerable local tax dollars that have not only provided operational improvement to the state's highway system but extended Metrolink commuter rail service via the 91/Perris Valley Line, the first new Metrolink extension to open since 1994. The 24-mile extension of Metrolink was designed to reduce traffic congestion on Interstate 215 and improve transit options for southwestern Riverside County residents.

RCTC has successfully delivered a diverse portfolio of transportation projects in Riverside County for decades because of the financial investment our residents make to improve the region's transportation system. These funds kept critically needed projects funded when state and federal funds ran dry. Also, these local funds, leveraged with available state and federal resources, ensure our region has the transportation infrastructure that is directly responsive to the needs of our diverse communities.

With the CAPTI, however, the state appears ready to prescribe how and when transportation should be delivered without regard for transportation needs in our region. Likewise, the Plan does not help or incentivize the relocation of job centers to communities doing more than their fair share to address the state's affordable housing shortage. While the state's emphasis has been on bringing in-fill housing to urban centers, equal emphasis should also be placed on bringing "in-fill" jobs to predominantly residential centers. To do so would reduce the need for long commutes outside our region and facilitate a shift in regional transportation planning away from long-distance inter-county highway commutes to more localized transit and active transportation improvements. Commuter traffic is not the only contributor to our region's roadway congestion. The ever-increasing movement of goods through inland southern California takes a substantial toll on our air, roadways, and infrastructure.

According to the Southern California Association of Governments, 32 percent of all containers entering the country come through the San Pedro Bay Ports, and the total container volume is expected to increase by 120 percent to over 34 million containers by 2045. Inland southern California is a thoroughfare for goods and freight movement to the rest of the country via four interstate highways and state routes, three airports, and 11 rail lines and subdivisions with an associated intermodal terminal and three railyards. Warehousing square footage in southern California exceeds 1.2 billion and 50 percent of these warehouses are located within five miles of State Route 60. The majority of new warehousing growth is in inland southern California due to the region having the most developable land zoned for industrial use. As a result, Interstate 10, Interstate 15, State Route 60, and State Route 91 averaged over 25,000 truck trips per day as of 2016.

Goods movement, coastal and urban job-center locations, and population growth due to availability of affordable housing put a substantial strain on our region's transportation network. Local, regional, and state collaboration is necessary before state agencies can implement the CAPTI strategies.

For these reasons, RCTC provides the following comments to the draft Plan:

**One-size does not fit all:** RCTC's concerns with CAPTI are rooted in the potential that CalSTA, Caltrans, the California Transportation Commission (CTC), and other state agencies will implement the Plan in a one-size-fits-all approach that does not consider local issues and needs. Riverside County, for example, is known for its affordable living, vibrant communities, and preserved open spaces. For these reasons, we are among the fastest-growing counties in the state. However, with this level of population growth, our residents also have among the longest daily commutes in California. A report published in 2019 based on U.S. Census data found that two Riverside County cities – Corona and Moreno Valley – are among the top 10 cities in the entire nation for average round-trip commute time (73.4 and 68.6 minutes, respectively). Highway congestion represents one of the top 10 concerns for our residents. The following Implementation Strategies will require ongoing collaboration with agencies like RCTC:

- S5.2 Update SHOPP and SB 1 Competitive Program Guidelines to Incentivize Climate Adaptation and Climate Risk Assessments/Strategies

- S6.1 Explore New Mechanisms to Mitigate Increases in Vehicle Miles Travelled (VMT) from Transportation Projects

**Maintain the State's integrity with the voters by delivering on the Senate Bill 1 promises:** As CTC Commissioners and industry organizations have stated, SB 1 was courageously passed by the legislature in 2017 after decades of inaction to increase transportation funding. SB 1 promised to reinvest in the dilapidated state-owned facilities that our state's residents, visitors, and economy rely on for their livelihoods. The funding from SB 1 promised to propel our state's transportation system forward is solely provided by vehicle owners as they register their vehicles and purchase fuel. The CAPTI indicates a commitment to SB 1's fix-it-first approach. However, we note the following Implementation Strategies that promise significant scrutiny will be placed on future highway project investments while CTC, Caltrans, and CalSTA reconsider guidelines for programs, including SCCP and TCEP that jeopardizes the intent of SB 1.

- S1.4 Mainstream Zero-Emission Vehicle Infrastructure within the Trade Corridor Enhancement Program
- S2.4 Increase Funding to Active Transportation Program
- S4.1 Develop and Implement the Caltrans Strategic Investment Strategy to Align Caltrans Project Nominations with the CAPTI Investment Framework
- S4.5 Develop and Implement Caltrans Climate Action Plan
- S4.6 Incorporate Zero-Emission Freight Infrastructure Needs into the California Freight Mobility Plan
- S5.2 Update Transportation Infrastructure Competitive Program Guidelines to Incentivize Climate Adaptation and Climate Risk Assessments/Strategies
- S6.3 Develop Interagency Framework for Project Evaluation Around Advancing Sustainable Communities
- S7.1 Leverage Transportation Investments to Incentivize Infill Housing Production

**Local control, investment, and resources:** Embedded in the CAPTI is a general theme that CalSTA, Caltrans, and CTC will prioritize funding for non-highway projects even when local voter-approved measures seek to make improvements to the state's highway system. The Plan also seeks to create stakeholder workgroups, including one that will evaluate roadway pricing that could impact local toll collection. The state cannot inhibit the implementation of RCTC's voter-approved project portfolio or interfere with toll pricing activities established by local independent authorities, like RCTC, without its approval.

- S6.2 Convene a Roadway Pricing Working Group to Provide State Support for Implementation of Local and Regional Efforts

**Confronting inequities, reducing harms, and increasing benefits:** RCTC joins CalSTA in its sincere efforts to right the wrongs of past transportation decisions that have instituted and perpetuated inequities and disadvantages, particularly to disadvantaged, low-income, and Black, Indigenous, and People of Color (BIPOC) individuals and communities. It is critically important that the CAPTI Investment Framework and Investment Strategies not continue to unintentionally harm the very individuals and communities we seek to uplift. In suburban and rural areas where housing is more available and affordable, social, and racial inequities will be perpetuated by divesting from the state highway system when a disproportionately high number of disadvantaged, low-income,

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and BIPOC individuals rely on this system to get to jobs in urban areas. CalSTA should therefore revisit the following Investment Framework Guiding Principles to recognize that social and racial inequities exist all over the state, not just in the urban cores, and that the inequities look different in various parts of the state:

- “Strengthening our commitment to social and racial equity by reducing public health and economic harms and maximizing community benefits”
- “Promoting projects that do not significantly increase passenger vehicle travel”
- “Promoting compact infill development while protecting residents and businesses from displacement”
- “Developing a zero-emission freight transportation system”

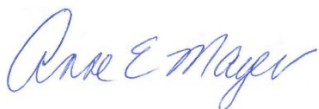
**No transportation-land use connections without including jobs:** As the CAPTI acknowledges, transportation projects are envisioned sometimes decades before they are ever delivered. The significant challenges involved with the environmental phase alone promise transportation improvements are not delivered until well-after they were needed. Acknowledging this unfortunate reality, the notion that “if you build it, they will come” is one of the distant past. Over the last two decades, the exponential population increases seen in Riverside County created a jobs-housing imbalance that leaves RCTC holding the bag. We do not have statutory authority over land-use decisions or job creation efforts. CAPTI Investment Strategy S7 to Strengthen Transportation-Land Use Connections harms areas like Riverside County that are doing their part to address the housing shortage in our state.

In conclusion, we stand ready to work with you on implementing the CAPTI goals, but we request that CalSTA allows for regional variation on the implementation methodology, protects the original intent of SB 1, and ensures the state continues transportation investment, including on highways, in our region.

Many of the goals set forth in CAPTI are commendable and critical to addressing the challenges of the 21<sup>st</sup> century. However, it contains the fatal flaw of infeasibility. The Plan does not recognize the staggering investments the state must make—not just in coastal urban centers, but also in more inland regions—in order to successfully secure an equitable and climate-resilient future for all. With good intent, the Plan instead applies stringent guidelines for existing funding that inland regions will struggle to meet. As a result, CAPTI as currently written would leave the very people it seeks to serve, behind.

I look forward to continuing this very important discussion and working with you towards implementing policies that enhance, not inhibit, transportation in Riverside County.

Sincerely,



Anne Mayer  
Executive Director