



October 15, 2024

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

Re: Comments for Consideration for the Update to the Climate Action Plan for Transportation Infrastructure

Dear Secretary Omishakin,

The Madera County Transportation Commission (MCTC), Merced County Association of Governments (MCAG), and the Tulare County Association of Governments (TCAG) write to share our comments on the Draft Actions Update for the Climate Action Plan for Transportation Infrastructure (CAPTI) shared during public workshops on September 17-19, 2024.

We applaud the state for CAPTI achievements to date, including overall reduction of vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions across the portfolio of CAPTI programs, an increase in multimodal investments and equity outcomes in disadvantaged communities, and positive jobs indicators during implementation of CAPTI. These accomplishments were realized while maintaining flexibility to design and deliver projects that reflect regional differences, project specific contexts, and community needs *and* advance shared goals around reducing climate and environmental impacts. We urge CalSTA to retain a flexible approach in the next iteration of CAPTI and any new actions proposed. It's with this flexibility in mind that we offer the following specific comments:

Oppose Draft Action to Set Multimodal Spending Goals for the Overall CAPTI Portfolio of Investments. Our agencies are concerned about setting specific multimodal spending goals for CAPTI programs. While maximizing climate outcomes per dollar invested is important work, the state and its regional partners are required by federal and state law to meet a multitude of different goals from safety to freight throughput to reducing congestion, just to name a few. An overall spending goal for specific modal purposes will ultimately make it more difficult to meet many goals simultaneously. Other transportation goals, such as safety, are of the utmost importance to our residents as we work to develop and build projects to meet our regional needs.

Support Draft Action to Improve VMT Analysis and Mitigation Guidance for Rural Projects to Better Account for the Low VMT Impact of Many Rural Projects. We fully support the draft action to improve VMT analysis and mitigation for transportation projects in rural areas. The use of VMT as a metric to analyze environmental impacts from transportation projects is one of the most controversial transportation policy issues today. Rural areas generally have much lower traffic volumes compared to urban areas and the goal for our regions is to improve accessibility, safety, and mobility for the traveling public. Rural projects don't necessarily increase vehicle trips but instead enhance the quality and safety of existing travel routes. As such, without improvements,

projects in rural areas could be required to mitigate VMT that doesn't actually exist in the rural context.

Oppose Draft Action to Update the Trade Corridor Enhancement Program (TCEP) Guidelines to State that Projects that Mitigate their Passenger VMT Impacts are More Competitive for Funding.

The purpose of TCEP is to provide funding for infrastructure improvements to improve safety, reduce congestion, relieve bottlenecks, reduce air quality impacts, and increase multimodal travel options on freight corridors. Some TCEP projects may increase VMT but remain *absolutely necessary* in pursuit of safety improvements or to reduce congestion and improve air quality. By way of example, the 2022 TCEP funded a project on SR 99 in Tulare County that improved safety and congestion through interchange enhancements that added bicycle and pedestrian infrastructure where none existed prior to the project. This laudable project did increase VMT and pursuant to SB 743 implementation mitigated VMT to the extent feasible. By arbitrarily giving priority to projects that mitigate all their VMT, the state would be elevating climate goals over other life-saving goals such as safety.

Oppose Draft Action to Update the Solutions for Congested Corridors Program (SCCP) Guidelines to Require that all Applications Demonstrate that they are VMT Neutral in Order to Compete in the Program, While Continuing Existing Practice in Guidelines to Prioritize Projects that Reduce VMT.

Like our perspectives on the TCEP, we also oppose requiring projects to be VMT neutral to compete and for giving priority to projects that reduce VMT in the SCCP. The SCCP is intended to achieve a balanced set of transportation, environmental, and community access improvements to reduce congestion throughout the state. VMT is only one metric in which to judge a transportation project and certain trade-offs may be worth VMT generated by a project, especially since SB 743 requires VMT analysis and mitigation to the extent feasible.

Thank you in advance for your consideration of our perspectives on these aspects of the Draft Actions for the CAPTI Update. We look forward to reviewing the Draft CAPTI Update upon its release and hope that this feedback will help you with developing that document. Should you have any questions regarding our feedback, please contact Kiana Valentine who represents our agencies on SR 99 corridor matters (kiana@politicogroup.com or (916) 266-3892).

Sincerely,



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Executive Director
Merced County Association of Governments



Ted Smalley
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Patricia Taylor
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