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David S. Kim, CalSTA Secretary
California State Transportation Agency (CalSTA)
915 Capitol Mall, Suite 350B
Sacramento, California 95814

Subject: Feedback on Draft Climate Action Plan for Transportation Infrastructure (CAPTI)

Dear Mr. Kim,

The Los Angeles Department of Transportation (LADOT) appreciates the opportunity to provide feedback on the Draft Climate Action Plan for Transportation Infrastructure (CAPTI). The CAPTI takes a holistic approach to addressing transportation-related climate change impacts. It identifies opportunities to integrate climate action into transportation policy while also recognizing changes that need to occur in separate yet related fields. LADOT recommends that the CAPTI be clarified and strengthened by addressing and incorporating the following considerations:

1. **Legacy Projects: CAPTI should evaluate “legacy projects” that were planned and funded prior to the State’s priorities on climate action, and assess their merit to determine corrective actions that can be implemented.** CAPTI should develop criteria to decide if legacy projects can be canceled, and funds deobligated and transferred to more effective programs in meeting the State’s climate goals. The role of legacy projects in exacerbating climate change, and opportunities to modify or cancel such projects, could be incorporated into the following Implementation Strategies:
 - **S1 - Cultivate and Accelerate Sustainable Transportation Innovation by Leading with State Investments:** This strategy acknowledges that past decisions for projects with long lead times may not align with the State’s current needs or policies. However, the key actions identified within S1 do not provide a pathway for stopping capacity-increasing projects that are in conflict with transportation and climate goals. S1.3 could be revised to deprioritize or simply cancel outdated legacy projects that are no longer desired based on current State priorities and policies.

- **S3. Elevate Community Voices in How We Plan and Fund Transportation Projects:** Many of the State's legacy projects were established and approved before there was a priority for community engagement or viable strategies for reaching hard to reach populations. Recognizing the importance of community input moving forward, legacy projects with their long lead time may have opportunities to strengthen local input to shape outcomes if such projects cannot be stopped altogether. This would be consistent with the desire to "...create pathways to give communities most impacted by transportation investments a meaningful voice in transportation planning and program development." All the key actions, S3.1-S3.4, could be modified to incorporate language that includes a role for community voices to shape legacy projects that have a history of offering little to no meaningful stakeholder engagement.
2. **'Fix it First' Clarification: CAPTI should assess if a legacy transportation system - developed in a time with outdated environmental, public engagement, and transportation metrics - is worth maintaining at current capacity.** The State's sprawling legacy transportation network is financially unsustainable at its current scale, resulting in a lot of neglected maintenance needs. California's transportation infrastructure also reflects decades of car-centric planning and outdated transportation metrics such as Level of Service (LOS) that omitted the community engagement now expected of such projects. Consequently, some roadways were built for a vehicle capacity never realized, or serve unnecessary redundancies, yet are maintained at great expense. Sometimes roadways in the State's legacy system inhibit access, and function more as barriers separating communities from neighbors, employment opportunities, open space, and destinations. As the State moves towards encouraging more sustainable modes of travel and achieving mode shift away from driving, the value of current facilities should be assessed before reflexively fixing a deteriorating system. CAPTI should consider downsizing capital projects and major repairs to something less resource-intensive to maintain. The following Implementation Strategies could be modified to clarify a more meaningful "Fix it First" application:
- **S5 Support Climate Resilience through Transportation System Improvements and Protections for Natural and Working Lands:** There may be times where a "fix it first" approach could perpetuate existing harm on communities by limiting access to employment or other destinations, and to nature by limiting access to open space. The strategy could be expanded to identify opportunities where fixing infrastructure may be unnecessary and undesired compared to the benefits of simply removing the roadway completely. With respect to S5.1, currently Caltrans Vulnerability Assessments and Adaptation Plans focus solely on restoring or reinforcing car infrastructure - omitting other modes - and assume the existing system as inevitable without any consideration of any merit or alternative solutions. S5.1, and other key actions should identify how to improve and reform existing practices and include venues for restoring natural land through facility removal as a viable "fix it first" strategy.
 - **S6 Support Local and Regional Innovation to Advance Sustainable Mobility:** This strategy should acknowledge, incorporate, and account for the phenomena of "reduced demand," the

counterpart to “induced demand.” “Reduced demand” demonstrates that reducing space for cars can reduce driving. Downsizing or removing (rather than simply fixing) infrastructure can offer long-term environmental benefits that result in reduced vehicle miles traveled. Similarly, retrofitting to serve more environmentally friendly purposes, such as transitioning roads for vehicles to bicycle highways or wildlife crossings, should be considered.

- **S7. Strengthen Transportation-Land Use Connections:** Some of the most valuable land in walkable and transit-accessible areas include roadways. As demonstrated in San Francisco, Oakland, Portland, Paris, and other cities that have removed freeways and major thoroughfares, the removal (rather than fixing) of deteriorated infrastructure presents opportunities to develop in urban communities and remove barriers to non-car travel. S7.3 discusses the potential for “Highways to Boulevards” conversions; however, S7.1 could be modified to include opportunities, such as the removal of redundant freeway ramps or roadways, to convert facilities into mixed-use or housing developments, open space or parks, to serve active transportation users, or other uses that reduce vehicle miles traveled and associated greenhouse gas emissions.

3. **Triggering Community Engagement: CAPTI should balance community engagement, which currently gets disproportionately applied to active transportation projects.** It is common for active transportation projects seeking funding to reflect and substantiate a level of community engagement that is not required or asked of vehicle focused projects. Active transportation projects often demonstrate robust and costly community engagement that includes multiple elements, such as: community workshop series, door-to-door canvassing and noticing, organized walk audits, outreach at community events, online surveying, web portals with detailed “before-after” renderings, social media campaigns, and more. By contrast, projects that prioritize vehicle speed, capacity, and throughput are not held to a similar standard for community engagement despite the fact that they can often be more intrusive with more widespread consequences on nearby stakeholders. The following Implementation Strategies could be modified to clarify thresholds for community engagement:

- **S3.3 Lift Up and Mainstream Community Engagement Best Practices** - Strategy 3 "Elevate community voices in how we plan and fund transportation projects" traditionally gets applied to active transportation projects but freeway widening and construction is viewed as inevitable and objective with little discourse about whether or how it should happen. Some level of community engagement must be applied to all projects and pots of money to make sustainable transportation projects. Introducing community engagement requirements to vehicle-focused projects that are more rigorous than what is asked of active transportation projects to receive funding will better reflect and account for the impacts and externalities of these projects - including traffic violence, air pollution, and the compounded inequities of these outcomes. While an increasingly thorough community engagement process is evident in a growing number of active transportation projects, a similar level of engagement is not visible in current capacity and speed increasing projects. Based on the safety and environmental impacts they carry, in

addition to the decades of harm vehicle-oriented policies have inflicted on communities of color, vehicle-focused projects should be held to a higher standard for documented community engagement to receive State funding and approval. The plan should consider ways to streamline approvals for climate-friendly projects and provide greater scrutiny for projects that would potentially undermine climate and equity goals.

4. **Formalize local-State partnerships to scope research based on local needs and innovations: the CAPTI should encourage and incorporate research partnerships to define the research scope to evaluate innovative pilot initiatives and validate State tools built to forecast measures of effectiveness of different transportation strategies to combat climate change.** The

understanding of strategies that prevent climate change is an evolving field rooted in behavioral science. Local agencies are able to work directly with community-based organizations, non-profit organizations, and other stakeholders to develop strategies with the propensity to change peoples' reliance on driving alone. However, the local transportation practitioner's understanding that is informed by user perspective is commonly not available to state agencies when they are preparing funding guidelines or even defining research topics that would inform sketch planning tools that determine eligible investment for funding. LADOT supports a more 'bottom-up process' in defining research needs. State agencies should rely on local agencies' knowledge to identify gaps in research that are needed to support innovative practices and pilot programs with a potential to reduce greenhouse gas emissions. State agencies could set aside funding for research partnerships that could evaluate innovative practices that would make more VMT reducing strategies available for funding and also provide the substantiating evidence to rely on innovative strategies as mitigation measures and further expand the applied envelope.

An example is that a well-connected network of bicycle boulevards along neighborhood streets that meaningfully address perceptions of travel stress have great potential to motivate more risk averse people (like women and older populations) to bicycle as a form of transportation. However, the Air Resource Board's (ARB) GHG reduction methodology does not recognize the benefits of bicycle boulevards, which freezes out state funding from GHG reduction funds to fund innovative strategies to close network gaps, such as installing bicycle signals where bicycle boulevards cross urban arterials. This leaves off the table an important strategy to address actual and perceived safety and comfort in order to motivate people to incorporate bicycling into their transportation choices.

To address this the State could regularly engage local agencies to ask about their planning challenges and fund research topics and evaluate pilot programs that provide evidence that is supportive of successful outcomes. The California City Transportation Initiative (CaCTI), a consortium of transportation planning agencies from the State's largest cities, has successfully partnered with Caltrans to define research needs to understand the relationship between building-level parking supply and VMT that could be further drawn on in agency efforts to reform parking requirements. The collaboration with CaCTI serves as a partnership model with local agencies, state agencies and academic researchers to define emerging research topics and advance

innovative break-throughs. We suggest to expand on the following Implementation Strategies to include opportunities for such collaborations:

- **S3.2 Strengthen and Expand Coordinated, Targeted Technical Assistance on State Transportation Funding Programs.**
 - Expand funding for research collaborations that are grounded in behavioral science.
 - Monitor and evaluate state-funded efforts to understand program efficacy, and set-aside funding to support
 - **S6.1 Explore New Mechanisms to Mitigate Increases in Vehicle Miles Travelled (VMT) from Transportation Projects.** Partner with local agencies to evaluate innovative practices and pilot programs to make more transportation demand management strategies available as mitigation measures, especially those strategies that are off-site from the site of the development project.
5. **VMT Exchange Clarification: the CAPTI should clarify state agency roles in VMT Mitigation Bank or Exchange program structures to alleviate undue administrative burdens.** VMT Banks and Exchanges can provide a meaningful funding source for transportation investments and programs that meet climate goals. However, depending on the program structure, VMT Mitigation Banks would require significant upfront administrative investment in establishing the program, which would include fund administration, credit validation, and program auditing. Local agencies have little incentive to invest in the administrative overhead, especially given that mitigation credits could be spent irrespective of jurisdictional boundaries. The CAPTI should support the creation and administration of VMT mitigation banks funded and led by a state agency. The following Implementation Strategies could be expanded on to clarify program structure:
- **S6.1 Explore New Mechanisms to Mitigate Increases in Vehicle Miles Traveled (VMT) from Transportation Projects.** Define a role for a state agency to fund and establish regional VMT Mitigation Banks and/or Exchanges and their operations. Local, county and regional agencies could partner in establishing and implementing an inventory of VMT reducing strategies that would be funded by such an exchange. State agencies could also provide seed funding to transportation management organizations (TMO) that would be responsible for monitoring developer-funded VMT mitigation strategies at a local and/or regional level.

LADOT appreciates your leadership in preparing this important plan and we respectfully request that you consider our comments. If you have any questions or require additional information, please contact David Somers at david.somers@lacity.org.

Sincerely,



Jay Kim, Assistant General Manager
Office of Mobility Management