



February 17, 2017

Secretary Brian Kelly
 California State Transportation Agency (CalSTA)
 915 Capitol Mall, Suite 350B
 Sacramento CA 95814

VIA E-MAIL

Re: California Priority Infrastructure Projects—Transportation

Dear Secretary Kelly,
 The undersigned organizations represent active transportation, public transit, public health, social justice, environmental, and environmental justice organizations that have a strong interest in how California invests federal and state transportation dollars. The Trump Administration’s request for priority infrastructure projects presents an opportunity for

California to make critical investments in a forward-looking transportation system that protects our environment, promotes social and economic justice, and improves our communities.

However, after reviewing the [preliminary list of transportation projects](#) submitted to the National Governors' Association, we believe that the initial project list runs counter to—and may ultimately undermine—the state's vision and goals for a sustainable transportation system. In addition, we are concerned that this select list could indicate to the Trump Administration that these are California's *only* priorities, which could result in federal funds being limited to certain uses, such as goods movement or highway capacity expansion. Below, we outline our concerns with the preliminary project list:

Lack of Alignment with State Climate Goals

With transportation comprising over one-third (37%) of all greenhouse gas emissions in the state and as the largest emitting sector in California, it is paramount that transportation investments do their part to keep California on track to meet our 2020 and 2030 goals as codified in AB32 and SB32. Given our ambitious climate goals, it is disheartening to see nearly two-thirds (15 out of 24 projects) of the proposed priority transportation projects focused on highway capacity expansion and widening. Highway capacity expansion and widening projects have been proven time and time again to increase vehicle miles travelled (VMT), particularly in the long-term.¹ Moreover, the same robust body of research has found that highway expansion and widening projects neither relieve traffic congestion nor increase employment or other economic activity.

Consequently, we urge you to integrate climate considerations in refining the state's transportation priority projects—particularly the projects' impacts on greenhouse gas emissions and VMT. Without such a threshold analysis for climate impacts, billions of dollars will be invested in transportation projects that will take us offtrack from meeting our climate goals.

Fix-It First Approach Missing

As the Administration and Legislature have been grappling with our transportation system's backlog of maintenance needs over the past several years, it is irresponsible to see such a heavy emphasis placed on new capital construction projects in the priority transportation projects list. We do certainly appreciate and support the inclusion of the replacement of the BART, Muni, and Metro rail fleets; however, there is a huge missed opportunity to include the repair and replace the rolling stock of our transit systems' bus fleets, which comprise the vast majority of

¹ Handy, S., Increasing Highway Capacity Unlikely to Relieve Traffic Congestion, National Center for Sustainable Transportation, October 2015. Available at http://www.dot.ca.gov/research/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf

the state's transit systems. Moreover, the transportation priority projects list fails to include support for transit operations, which is a critical component to maintaining the health and viability of our transit systems. Accordingly, we urge you to elevate a fix-it first approach in refining the state's transportation priority projects.

No Investments in Active Transportation

Investments in active transportation are essential for California to meet its climate goals. Given the steady \$1 billion of funding requests to each cycle of the Active Transportation Program (ATP), it is shocking that the transportation priority project list fails to list a single active transportation project. Moreover, because the ATP is comprised of nearly three-quarters federal funds, the lack of active transportation as a priority for California may provide an excuse to the federal government to simply defund the Surface Transportation Block Grant Program—Transportation Alternatives Program (TAP) Set-Aside. Now more than ever, it is critical for California to cement its national leadership on active transportation and to incorporate transformative active transportation projects in the transportation priorities project list.

Transit Capital Investments Biased Toward Rail

While we support the transit projects included in the priority projects list, it is critical to note that not a single proposed transit project invests in bus or bus rapid transit (BRT) projects. The bias toward rail in the proposed transit investments ignore that the vast majority of transit systems are comprised of buses and the vast majority of transit riders currently rely on bus services. In many communities existing bus service is not adequate and improvements to frequency, such as through BRT investments, would greatly improve a huge number of Californians' quality of life and enable increased access to economic opportunity. We strongly urge you to incorporate bus and BRT projects as you are refining California's transportation priority projects list.

Clean Freight Investments Needed

The preliminary list is heavily weighted towards increasing freight transport, and such an overemphasis on freight movement may undermine the state's ambitious Mobile Source Strategy and its Sustainable Freight goals. The state has made great strides in the past several years adopting the Sustainable Freight Action Plan and the 2016 Strategy State Implementation Plan to dramatically reduce harmful pollutants and emissions, set zero emission targets, as well to comply with the federal Clean Air Act. Outside of the Administration's sustainable freight efforts, there are several strategies within the Legislature to align freight investments with the Sustainable Freight Action Plan, in addition to codifying cleaner vehicles and equipment mandates. This broad state-level support must be sustained with any new freight investments, and furthermore must be accompanied by mitigation at freight facilities, along freight corridors,

or in freight-impacted communities. Further investment in freight corridors, without sustainable freight safeguards in place, will exacerbate the acute negative impact on vulnerable communities living along freight-caused toxic hot spots.

Need for Assured Economic Benefits for Californians

Lastly, our state infrastructure investments provide us with a significant opportunity to target economic benefits to communities experiencing high levels of poverty and unemployment and to encourage similar policies at both the federal level and across the country. These investments should be coupled with an increase in training and pre-apprenticeship programs, supportive services so that low-income residents can successfully enter pathways into jobs, and targeted hire commitments that promote access for underrepresented workers facing significant barriers to employment. This will ultimately maximize education and employment outcomes and build stronger local, regional, and state economies.

We look forward to working with you, your staff, and other transportation stakeholders to leverage the federal government’s infrastructure package to create a transportation system that provides clean, affordable access to opportunity for all Californians, and that makes our communities healthy, equitable, and safe places to live and work while addressing air quality and climate change.

Sincerely,

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