



November 21, 2024

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

Subject: 2024 DRAFT CAPTI ACTIONS

Dear Secretary Omishakin,

On behalf of the City of Lake Elsinore, I am writing to express deep concerns with the California State Transportation Agency's (CalSTA) Draft 2024 Climate Action Plan for Transportation Infrastructure (CAPTI) Actions.

Specifically, the City of Lake Elsinore opposes draft actions seeking to:

- Deprioritize highway and road investments in Senate Bill 1 (Beall, 2017) gas tax funding program guidelines, and;
- Codify CAPTI Guiding Principles in statute.

Congestion relief is ranked among the issues of greatest public concern in our region, with nearly one million of the 2.5 million Riverside County residents driving to get to their jobs. With Riverside County expected to grow by 17% to 3 million residents over the next 25 years, our region is the key to statewide success in meeting housing needs and it defies logic to saddle our transportation projects with the costs of full impractical VMT neutrality in order to receive SB 1 gas tax funds that our residents pay to the state while they sit in worsening congestion. Moreover, CalSTA's proposed policy conflicts directly with the expectations of voters who affirmed the need for SB 1 funding in 2018 by rejecting Proposition 6.

As one of the fastest growing cities in California over the last 10 years, SB 1 funding for Lake Elsinore is crucial, especially with a continued 7.5% growth rate over the next two years in population. We must reevaluate how VMTs are calculated and make the process more predictable to assist with how we can develop our integrated transportation systems in a more sequential process, and how development interconnects with the city's public health, safety, and equity. It is important that while we continue to prioritize funding transportation projects like the City of Lake Elsinore is doing, as is the region, and not reduce or increase VMT which can seriously delay and influence how these projects are planned and designed making it even more difficult to compete for SB 1 gas tax program funding. The City of Lake Elsinore, like all local agencies, utilize SB 1 funds for integrating improvements that support active transportation int of our road maintenance and rehabilitation projects, including improvements that might have otherwise sought competitive grant funding.

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Furthermore, efforts to codify CAPTI Guiding Principles into statute are simply premature. The state must first study CAPTI's impacts on transportation mobility in regions across the state.

Codifying any portion of CAPTI ties the hands of agencies awarding transportation funding. Without consideration for project merits and regional needs, our projects will no longer be competitive, leaving our residents behind with insufficient transportation systems. Our communities need funding to support all transportation modes. For example, active transportation components were included in 1,458 of the 5,279 projects that cities and counties completed with SB 1 Road Maintenance and Rehabilitation Account funds during the first two-and-a-half fiscal years of the program (2017-18 through 2019-20). For planned projects included in the fiscal year 2020- 21 lists submitted to the California Transportation Commission, local governments identified 269 of the 2,761 projects as including active transportation components. Aside from exacerbating the overwhelming maintenance and repair needs identified above, a diversion from local streets and roads formula funding to the Active Transportation Program would simply reallocate flexible funds that are already often used to maintain active transportation facilities or create new active transportation infrastructure during larger rehabilitation projects.

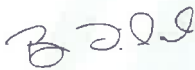
The City of Lake Elsinore applauds CalSTA's efforts to promote the development of VMT mitigation banks and exchanges and to reevaluate how VMT analyses are conducted in rural areas to make the mitigation process more predictable and cost-effective. However, other draft actions fail to recognize that it would take decades and tens of billions of dollars to construct and operate an integrated public transportation system that Riverside County residents would need to get where they need without a car.

Any update to CAPTI must be pragmatic, flexible, and implementable. Leave SB 1 programs alone, and do not pursue the codifying of CAPTI Guiding Principles. If you have questions regarding these comments, please contact Gina Gonzalez, ggonzalez@lake-elsinore.org, Director of Economic Development and Legislative Affairs. Thank you for your thoughtful consideration and please include both Gina Gonzalez, ggonzalez@lake-elsinore.org, and Jason Simpson, City Manager for Lake Elsinore, jsimpson@lake-elsinore.org on all future communications regarding CAPTI and transportation policy and funding.

Sincerely,



Steve Manos
Mayor (District 2)



Brian Tisdale
Mayor Pro Tem (District 1)



Timothy J. Sheridan
Council member (District 3)



Natasha Johnson
Council member (District 4)



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