



Office of the Mayor

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November 21, 2024

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

Subject: Draft 2024 CAPTI Actions Comment Letter

Dear Secretary Omishakin,

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

Specifically, the City of Moreno Valley 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 for 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.

The following are the potential impacts to Moreno Valley:

- SR-60 Interchanges

The City is actively pursuing the upgrades of two SR-60 interchanges (Redlands Boulevard and World Logistics Center). An increase in traffic capacity is unavoidable and with the proposed changes we would most likely be required to buy VMT credits from a state-wide VMT mitigation bank making these projects even more costly.

- I-215/SR-60 Congestion Mitigation

The City is coordinating with local transportation authority and other municipalities to resolve the traffic congestion issues at I-215/SR-60. A VMT neutral solution does not exist at the present time. The proposed CAPTI requirements could force Caltrans to reject any proposed improvements.



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- VMT Local Assistance

It is unclear whether local municipalities must follow the future VMT guidelines or if we would still be allowed to develop our own mitigation program.

- SB1 Funding

There is also concern that the CAPTI changes to SB1 funding for the competitive portions if might have a later cascading effect to local non-competitive funding and limit what the City can do with SB1 funds.

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.

The City of Moreno Valley 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 Melissa Walker at 951-413-3100 or melissaw@moval.org. Thank you for your thoughtful consideration.

Please include Melissa Walker, Director of Public Works on all future communications regarding CAPTI and transportation policy and funding.

Sincerely,

Ulises Cabrera
Mayor