



## Western Riverside Council of Governments

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12/2/2024

November 24, 2024

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

### **Subject: 2024 CAPTI Actions Comment Letter**

Dear Secretary Omishakin,

On behalf of the members of the Western Riverside Council of Governments (WRCOG), I am writing to express deep concerns with California State Transportation Agency's (CalSTA) Draft 2024 Climate Action Plan for Transportation Infrastructure (CAPTI) Actions. If the document is adopted as currently proposed, it will severely impact the 2 million people living in Western Riverside County.

Our primary concern is the inclusion of language regarding vehicle miles traveled (VMT) neutrality as it relates to transportation funding decisions. If implemented, VMT neutrality will disqualify a significant number of key regional transportation projects from receiving funding from sources such as SB 1.

Over the past 20 years, Western Riverside County has made numerous efforts to create a transportation system which serves the needs of our residents, businesses and visitors. Some key efforts have included:

- A transportation sales tax (Measure A) to help fund the transportation system.
- A regional transportation impact mitigation fee (Transportation Uniform Mitigation Fee) whereby
- new development pays for its fair share of impacts to the transportation system
- A regional habitat mitigation program (Multi-Species Habitat Conservation Plan)
- An extensive regional bus network (Riverside Transit Agency)
- Expanding commuter rail service (Metrolink)
- Promoting and facilitating the purchase and use of zero-emission vehicles (Western Riverside
- Clean Cities Coalition)

These collaborative efforts have all contributed to a transportation system which benefits a wide variety of users. Additionally, our region has focused on providing a range of housing choices within the context of various State regulations. For example, 95% of our member agencies have an approved Housing Element. Also, 40% of all new housing built in Western Riverside County in 2023 and 2024 was higher density multi-family housing.

Our region has taken additional steps to create a robust multi-modal transportation system while working towards the GHG and VMT reduction goals California has adopted. WRCOG is currently leading a regional effort to develop a comprehensive regional VMT mitigation program which would potentially fund active and public transportation, affording housing, and habitat conservation.

The main challenge we face is one of practicality. The Western Riverside County region currently has approximately 600,000 housing units, both single-family and multi-family. Over the past 10 years, only 6,000 units have been built on an annual basis, which means that the stock of dwelling units increases by only 1% a year. Our land use pattern is fundamentally different than the denser, urbanized areas and will not significantly change in the foreseeable future.

This means many residents currently rely on and will continue to rely on the use of personal vehicles for their daily travel for the foreseeable future. They travel to work, take their children to school, shop, and attend to other personal needs through driving. Regardless of our efforts related to encourage the use of active and public transportation, current travel and driving habits will not change. Adopting VMT neutrality as a core principle of CAPTI, particularly as it relates to funding programs such



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as SB 1, means that the roadway infrastructure projects will be severely disadvantaged during funding allocations. In all likelihood, these projects will receive little or no funding from SB 1. While the region has its own funding sources (Measure A and TUMF), SB 1 funding is often needed to bridge funding gaps, especially for regionally significant projects.

We would ask that you consider how the impacts of these actions would have on our residents who are simply going about their daily lives. A lack of investment in the types of roadway projects which serve their daily needs (Interchanges, bridges, grade separations, etc.) will degrade their quality of life as they are forced to endure longer and longer commutes.

One possible outcome is that many of current residents will choose to leave California entirely. Much of the growth in Western Riverside County comes from people moving here from other areas of California. According to the US Census, many of them are coming from areas such as Los Angeles County, Orange County, and San Diego County. Our new residents have chosen to live in this region rather than leave the State, as others have. If congestion worsens because there is no investment in the transportation system, Western Riverside County will no longer be an attractive destination for those relocating and they likely will leave the State.

Based on the above, we strongly oppose the inclusion of language related to VMT neutrality in CAPTI, particularly if it relates to any funding programs and funding allocations.

Please include Dr. Kurt Wilson, WRCOG Executive Director, on all future communications regarding CAPTI and transportation policy and funding.

Sincerely,

Dr. Kurt Wilson  
WRCOG Executive Director