

Transportation Solutions Defense and Education Fund

P.O. Box 151439 San Rafael, CA 94915 415-331-1982

June 5, 2018
By E-Mail to
contact.us@
calsta.ca.gov

Brian Annis, Secretary
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

Re: TIRCP Third Round Selected Project: LAVTA

Dear Mr. Secretary:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental non-profit dedicated to the regional planning of transportation, land use and air quality. Our specific focus in recent years has been reducing the GHG impacts of transportation. It is because of that focus that we write you today to object to the selection of LAVTA's Dublin/Pleasanton Capacity Improvement and Congestion Reduction Program for TIRCP funding.

Almost all of the projects announced in the Third Round Selected Projects--Project Detail Summary are for the acquisition of low-carbon transit vehicles. Each has explicit GHG emissions reduction projections. Even the bike-ped project for San Diego had a projected GHG reduction. LAVTA's project is doubly atypical of the rest of the awardees: it has no GHG reduction projection, and it has the worst rankings of any project on the list. It is deeply troubling to see a State Agency seemingly set aside its climate priorities to make good on an environmentally questionable political deal.

Please provide documentation to demonstrate that CalSTA has fully complied with Section 16428.9 of the Government Code in its TIRCP funding of the LAVTA project. We will file a formal PRA request if this informal request is not honored.

TRANSDEF believes that parking facilities should have a very low priority in the allocation of transit funding. The capital for parking structures should come from market participants, not CalSTA. Let the economic forces of parking charges provide the incentive to not drive alone to transit. The resulting reduction in traffic benefits the walkability of station areas. To implement the State's goals of VMT and GHG reduction, the concept of subsidized parking needs to become obsolete.

It would be poor public policy, however, to impose parking fees in the absence of a convenient alternative to driving alone. Consistent with the purposes of TIRCP, it would have been appropriate to fund the operation of a network of LAVTA low-carbon shuttles to BART, instead of a parking garage.

As you know, the Cap and Trade program was challenged as being a tax. The inclusion of a project like LAVTA's, which is publicly known to be the result of a political deal made with a legislator, harms the credibility of the program, and amounts to evidence of the GGRF being used as a slush fund. The funding approval should be reversed, and a more proper use of funds be found. As stated above, we would be pleased to see the funds used for shuttle operations.

We would like to see CalSTA be consistent with the State's climate policy in its funding decisions. If we can be helpful, please let us know.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President
David@Schonbrunn.org

