



Secretary David Kim  
California State Transportation Agency  
915 Capitol Mall, Suite 350B  
Sacramento, CA 95814

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**Re: Support for Climate Action Plan for Transportation Infrastructure Draft Plan**

We, the undersigned organizations, are writing in support of the Climate Action Plan for Transportation Infrastructure (CAPTI). We believe this plan is necessary to align the State's transportation spending around our climate goals, public health needs, and equity values. By focusing our resources on transportation solutions that build our economy in a sustainable way, we can make significant strides in achieving racial and economic justice. It is through implementation of CAPTI that the combined cost of housing and transportation can be reduced, especially for families struggling the most to make ends meet. We encourage the immediate adoption of CAPTI by all agencies responsible for making decisions about transportation infrastructure.

The transportation sector is responsible for about 50 percent of greenhouse gas emissions, nearly 80 percent of nitrogen oxide pollution, and 90 percent of diesel particulate matter pollution in the State. To combat this, Governor Newsom directed the State Transportation Agency in Executive Order (EO) N-19-19<sup>1</sup> and EO N-79-20<sup>2</sup> to “leverage the more than \$5 billion in annual state transportation spending...to reverse the trend of increased fuel consumption and reduce greenhouse gas emissions,” and shift transportation infrastructure spending to climate-friendly options and shift the State towards electric vehicles.

To achieve this vision and meet our climate goals, California needs a multifaceted approach, including but not limited to: increasing walking and biking infrastructure, connecting communities and increasing access to multi-modal options, shifting drivers to electric vehicles, providing adequate robust public transit and creating more affordable and accessible communities. The CAPTI climate, equity, health, and mobility framework represents a necessary step for California’s future.

California has diverse needs and our transportation systems should be responsive to those needs. Some Californians have to drive long distances for work;. They deserve more options for their commutes, including public transit, bicycle highways and ridesharing, which are more climate-friendly solutions than inducing more traffic by continually adding freeway lanes for single occupancy vehicles. For rural communities, VMT reduction metrics must consider their unique challenges to change transportation behavior, and seek to employ land use and transportation investments that will revitalize rural mainstreets rather than neglect them. The CAPTI framework and guiding principles accommodate communities with diverse needs.

In addressing these diverse needs, we commend California State Transportation Agency (CalSTA) for facilitating an inclusive and robust public input process to develop CAPTI. For a year and a half, numerous workshops provided multiple opportunities for input and feedback on the development of CAPTI’s ten guiding principles and seven implementation strategies. This intentionality is apparent when looking at the well-rounded, holistic scope of CAPTI. We encourage CalSTA and other agencies to continue to use this as a minimum standard for public engagement moving forward.

CAPTI provides a multi-agency, multi-strategy approach to achieving our goals. It recognizes that to move California in the right directions, we need both electric vehicles and overall reduction in vehicle miles traveled. We need a holistic approach that protects business and residents from displacement. We must ensure that the needs of communities, especially communities historically harmed by transportation decisions, are heard and prioritized. We must rectify historic disparities, which means giving active transportation the same considerations, if not more, than we give vehicles. Also, we need multiple agencies, working together to achieve these goals. This is why we strongly support CAPTI. ***CAPTI’s guiding principles lay the foundation for transportation decision-making and investment to shift to an equitable, less polluted, more connected California.***

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<sup>1</sup> <https://www.gov.ca.gov/wp-content/uploads/2019/09/9.20.19-Climate-EO-N-19-19.pdf>

<sup>2</sup>

<https://www.library.ca.gov/Content/pdf/GovernmentPublications/executive-order-proclamation/40-N-79-20.pdf>

Along with the guiding principles, we strongly support the following actions for the reasons named below:

**1.1 Prioritize Solutions for Congested Corridors Program (SCCP) Projects that Enable Travelers to Opt Out of Congestion**

Highway widening is not an ultimate solution to congestion. We must invest in improving alternatives.

**1.4 Mainstream Zero-Emission Vehicle Infrastructure within the Trade Corridor Enhancement Program (TCEP)**

Investments in charging infrastructure are key to spurring zero-emission vehicle adoption.

**2.2 Identify A Long-Term Strategic Funding Pathway Across All Funding Opportunities to Realize the State Rail Plan**

Rail service is either infrequent or nonexistent in most of the state. This historic neglect needs rectifying.

**2.4 Increase Funding to Active Transportation Program (ATP)**

Active modes of transportation have been marginalized to the extent that vehicles pose grave danger to people on foot, bicycle, or otherwise trying to get around without a vehicle. These injustices warrant increased attention and investment.

**3.1 Establish Transportation Equity and Environmental Justice Advisory Committee(s)**

Environmental justice community leaders should be compensated for their time, and their input should be elevated to the level of impacting decisions.

**3.4 Develop and Utilize Equity Index to Assist in Evaluation or Prioritization of Caltrans Projects**

This new tracking mechanism should be used to work towards continuous improvement.

**4.1 Develop and Implement the Caltrans Strategic Investment Strategy (CSIS) to Align Caltrans Project Nominations with the CAPTI Investment Framework**

In addition to equity and multimodal mobility metrics, transparent VMT metrics that accurately account for induced travel should be front-and-center to this project prioritization approach.

**4.4 Refocus Caltrans Corridor Planning Efforts to Prioritize Sustainable Multimodal Investments in Key Corridors of Statewide and Regional Significance**

High-quality multimodal planning must presuppose infrastructure investments. Meeting the needs of historically marginalized people must be centered through inclusive engagement practices and a contextually-sensitive approach.

**4.6 Incorporate Zero-Emission Freight Infrastructure Needs into the California Freight Mobility Plan (CFMP)**

Freight is a significant source of local air pollution. Investing in zero-emission freight projects delivers climate and environmental justice benefits.

## **6.2 Convene a Roadway Pricing Working Group**

Road pricing mechanisms have the potential to deliver equity outcomes, but only if designed intentionally to do so. This working group must have as its mission to recommend how road pricing can deliver net benefits for low-income people and Black and Brown communities.

## **7.1 Leverage Transportation Investments to Incentivize Infill Housing Production**

We cannot accept a future of increasing segregation where people must drive until they can afford to live. Rather, equitable infill development is needed to create inclusive, complete communities where people do not have to drive so much.

## **7.2 Create Working Group to Explore Potential Actions to Address Direct and Indirect Displacement in Transportation Programs**

In order to deliver multimodal mobility benefits to historically marginalized communities, a holistic approach must be taken that minimizes displacement pressure.

## **7.3 Explore a “Highways to Boulevards” Conversion Pilot Program**

Past transportation decisions have put up barriers, divided communities, and amplified racial inequalities. This pilot program would help address these inequities and create new access to opportunity. It aligns with President Biden’s American Jobs Plan, which could be a source of funding for such conversion projects.

While we are supportive of this plan and praise its intent, there are areas where CAPTI should be strengthened. The following are improvements to make CAPTI a complete policy framework:

- ***CAPTI needs to set clear shared definitions and metrics for transportation infrastructure.*** When naming ideas like congestion reduction, multimodal, and transportation equity, there must be a standard definition all agencies are using. When creating these definitions and metrics, it is equally important to make sure they align with our greenhouse gas (GHG) reduction goals and air quality standards.
- ***CAPTI strategies need quantitative and qualitative metrics to track progress.*** As agencies embark on shifting the state’s \$5 billion in annual transportation funding to more equitable, climate-friendly solutions, it is necessary to have a shared understanding of where the investment is going. Caltrans and partner agencies should report to CTC annually on how much of that \$5 billion has been reprioritized and where further progress remains. Caltrans should move quickly on its departmental Climate Action Plan to set targets for reducing vehicle miles traveled and greenhouse gas emissions, as well as, increasing access to multi-modal options and creating jobs.
- ***CAPTI needs to be tracked with regular progress reports and evaluations.*** It is not enough to set metrics, but they must be regularly tracked, reported, and evaluated. When creating the reports, it is important to make sure that there is robust stakeholder

engagement to tell the whole story, including shortcomings, and not only report on achievements. Once completed, these reports should be used to evaluate and recalibrate strategies.

- ***All agencies should work together to prioritize shifting spending towards cleaner, healthier transportation choices.*** There needs to be a concerted effort to align our transportation sector through joint meetings, multi-agency workgroups, and regular communication. Agencies should be using these collaborative spaces as opportunities for accountability and strategizing.
- ***Identify current statute that is misaligned with our climate goals and Scoping Plan.*** In places where agencies cannot efficiently align spending with climate and equity goals due to existing statutes, this should be reported publicly. These laws that are harmful or counter to the goals of CAPTI need to be identified so the legislature can consider appropriate action.

Even with the above suggestions for improvement, we believe CAPTI should be implemented immediately. We look forward to working together as CAPTI is implemented and strengthened moving forward.

Nailah Pope-Harden, Policy Manager  
ClimatePlan

Carter Rubin, Mobility and Climate Advocate  
Natural Resources Defense Council

Jonathan Matz, California Senior Policy Manager  
Safe Routes Partnership

Julia Randolph, Policy and Outreach Associate  
Coalition for Clean Air

Matthew Baker, Policy Director  
Planning and Conservation League

Caro Jauregui, Co-Executive Director  
California Walks

Bryn Lindblad, Deputy Director  
Climate Resolve

Nick Josefowitz, Chief of Policy  
SPUR

Hana Creger, Senior Program Manager of Climate Equity

The Greenlining Institute

Michael Schneider, Founder  
Streets for All

David Diaz, MPH, Executive Director  
Active San Gabriel Valley

Kathy Dervin, MPH, Co-coordinator, Legislative Cmt,  
350 Bay Area Action

Ector Olivares, Program Manager, Environmental Justice Program  
Catholic Charities of the Diocese of Stockton

David Weiskopf, Senior Policy Advisor  
NextGen California

Jamario Jackson, Senior Community Planner  
TransForm

Alicia Brown, Project Manager  
WalkSacramento

Cc:

California State Transportation Agency (Undersecretary. Elissa Konove, Deputy Secretary. Darwin Moosavi, Deputy Secretary. Avital Barnea)

California Transportation Commission (Chair. Hilary Norton, Director. Mitch Weiss, Deputy Director. Tanisha Taylor)

California Department of Transportation (Director. Toks Omishakin, Deputy Director. Ellen Greenberg, Deputy Director. Jeanie Ward-Waller, Tony Dang)

California Air Resources Board (Chair. Liana Randolph, Jennifer Gress, Monique Davis)

California Department Housing and Community Development (Josh Rosa)

California Strategic Growth Council (Acting Executive Director. Jessica Buendia, Egon Terplan)

Governor's Office of Planning and Research (Director. Kate Gordon)