

May 19, 2021

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

Dear Secretary Kim:

Thank you for the opportunity to comment on the Climate Action Plan for Transportation Infrastructure (CAPTI). The Nature Conservancy (TNC) is an international, non-profit conservation organization working around the world to protect important lands and waters for people and nature. TNC is the world's largest conservation organization with over one million members, including 100,000 in California.

We strongly support the CAPTI as it will, if implemented, reduce greenhouse gas (GHG) emissions from the transportation sector, and help communities and the transportation sector become more resilient to the changing climate. It will also make significant strides toward achieving other state policy goals, such as reaching carbon neutrality, preserving and enhancing natural and working lands and the services they provide to people and nature, achieving racial and economic justice, improving public health and sustaining a vibrant economy. We appreciate the holistic approach of the CAPTI, the vision and scope reflected in the guiding principles, and the work that went into engaging stakeholders throughout the process. We also support the goal of aligning transportation investments with the strategies and actions contained in the CAPTI. Yet the promise will not be achieved if it is not implemented; we realize many strategies and activities included in the CAPTI represent a change from current practices, which will be difficult to achieve. However, the premise on which the CAPTI is built – to reduce GHG emissions from the transportation sector (the largest contributor of GHG emissions in California) to make progress against climate change - makes implementation ever more important to protect our communities, our lands and waters. While the CAPTI's influence is limited to specific discretionary pots of transportation funding, we hope that it offers guiding principles and actions that other transportation agencies throughout the state can adopt so that GHG emissions from the entire transportation sector can be reduced.

TNC would like to align ourselves with the comments included in [this letter signed by numerous organizations](#). In addition, we would like to make the following comments centered on Natural and Working Lands related strategies.

Guiding Principles: we support the Guiding Principles and appreciate including natural and working lands conservation as one of them. Through policy, the use of best practices and science, natural and working lands can contribute to the State's climate and transportation goals while strengthening resilience. We recommend one edit to the guiding principle related to natural and working lands: this principle should include nature-based solutions in transportation investments. Pursuant to Executive Order N-82-20, the state is actively seeking to support the conservation and management of lands to support carbon neutrality, providing the opportunity and impetus across agencies to optimize climate solutions across sectors. Nature-based solutions

are being successfully employed for a variety of services and benefits, including climate change mitigation, coastal resilience, flood risk reduction and resilience to wildfire threats. To support and acknowledge these multiple benefits, we recommend the guiding principle be edited to read:

*Protecting natural and working lands from conversion to more intensified uses and enhance biodiversity by supporting local and regional conservation planning that focuses development where it already exists, ~~and~~ align transportation investments with conservation priorities to reduce transportation's impact on the natural environment **and employ nature-based solutions to reduce GHG emissions and enhance climate resilience.***

Strategy 5: We appreciate including natural and working lands as a pillar for the CAPTI. California's natural and working lands are critical to reducing GHG emissions and protecting communities – including transportation infrastructure, and wildlife from the harmful impacts of climate change. The elements of the strategy need to be more robust to leverage existing work with at the intersection of conservation/urban greening and transportation sectors, and to provide the guidance and opportunities to leverage California's rich, biodiverse – and threatened – natural and working lands, including in urban areas, to address the climate crisis. We also urge the CAPTI to provide more specific and urgent timelines for the actions in this strategy. We recommend adding the following key actions and offer our assistance to help develop and workshop these strategies and draft descriptions for the final CAPTI and implementation.

Require consideration and prioritization of nature-based solutions when investing in climate resilience projects.

- *This action would give incentive and spark ideas to invest in best practices and projects like wetlands conservation and restoration, vegetation management, culvert improvements that result in more resilient transportation facilities, support habitat and biodiversity goals and generate support for projects.*

Protect and enhance habitat connectivity by investing in wildlife crossing infrastructure to improve safety, enhance transportation resilience and enable wildlife to thrive as they adapt to a changing climate.

- *This action would leverage the growing body of work on the importance of wildlife linkages for transportation safety, transportation resilience, wildlife and biodiversity protection and generate support for projects for existing roadways where smaller or no future roadway or other infrastructure projects are planned and for future roadway projects where projects are planned and wildlife crossing infrastructure can be part of the mitigation strategy.*

Participate in conservation planning and integrate conservation and climate resilience information in transportation plans and projects to avoid impacts to conservation priorities and habitat linkages, reduce risk to transportation projects, and optimize GHG reductions and carbon sequestration.

- *This action is aligned with state goals and statutes, and leverages the long standing body of work aligning transportation and conservation planning (such as Regional Conservation Investment Strategies, Natural Community Conservation Plans, Habitat Conservation Plans and Greenprints) to support conservation goals and transportation project delivery.*

Incorporate natural elements in transportation facilities to reduce GHG emissions and increase resilience.

- *This action will help reduce GHG emissions, sequester carbon, and increase community resilience, support cleaner air, cleaner water, public health, and biodiversity, especially in urban and urbanizing environments. Examples of natural elements include street trees, upgraded drainage structures (culverts and bridges) that accommodate both flood flows and wildlife movement, native drought-resistant plantings, road edge hardening to reduce wildfire ignitions, bioswales and wetlands.*

Strategy 6: We were encouraged to see considerations of new strategies to mitigate Vehicle Miles Traveled as noted in S6.1. We support the idea of expanding the current Advance Mitigation Program at Caltrans to add VMT mitigation as long as the funding for habitat and species mitigation is not eroded for VMT mitigation strategies. We also urge that equity and environmental justice concerns are incorporated into a VMT mitigation program as a central tenet.

In conclusion, we want to reiterate our support for the draft CAPTI and look forward to helping revise it to fully take advantage of the power of nature to reduce GHG emissions, increase transportation and community resilience and reduce risk to projects. We stand ready to help revise the draft CAPTI and work in partnership during implementation.

Sincerely,



Liz O'Donoghue
Director, Sustainable Development Strategy
The Nature Conservancy

cc: CalSTA: Darwin Moosavi
Caltrans: Toks Omishakin, Mike Keever, Jeanie Ward-Waller, Ellen Greenberg, Tony Dang
CTC: Mitch Weiss
Natural Resources Agency: Wade Crowfoot, Amanda Hansen
Office of Planning and Research: Kate Gordon
Strategic Growth Council: Jessica Buendia, Emily Tibbott
California Air Resources Board: Rajinder Sahota, Jennifer Gress