

May 19, 2021

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

RE: Climate Action Plan for Transportation Infrastructure - PUBLIC COMMENT

Dear Secretary Kim,

NextGen California is in support of the Climate Action Plan for Transportation Infrastructure, or CAPTI, and respectfully requests the consideration of the following recommendations by the California Transportation Agency and other acting agencies developing this important plan.

CAPTI is an integral first step for the state to address the long overdue health and equity harms that decades of inequitable transportation decisions have created. NextGen California, along with a multitude of stakeholders, has been participating in the recent workshops to share our support for the current draft plan and to offer recommendations. Specifically, the final plan should place more emphasis and urgency on equitable active transportation investments, tracking the climate performance of projects, and accelerating the electrification of our state's most polluting vehicles.

NextGen recommends that CAPTI prioritize projects that provide a holistic approach to active transportation solutions that benefit air quality, public health, and mobility. At present, the Active Transportation Program is over-subscribed and long overdue for increased funding, therefore, NextGen supports Strategy 2.4 to increase funding for the ATP and recommends making this strategy medium-term (3-7 years) rather than its current designation of short-term (0-2 years). We applaud the short-term supplemental funding as well, and we propose that the plan seek permanent reallocation of funds from multiple funding sources (e.g., SHOPP, TCEP, SCCP, TIRCP, etc.) for active transportation to ensure long term sustainability for all programs.

NextGen also recommends incorporating urban greening and urban forestry in Strategies 1.1 or 2.4 for active transportation decisions to make routes shaded and safer, to reduce risks from heat exposure and vehicle strikes for Californians living in transit-poor locations. Protected bike and pedestrian ways are critical for public safety

and must be a vital component of CAPTI's sustainable and active transportation solutions in at-risk areas where it is too hot or too dangerous to walk or bike.

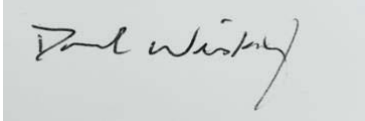
CAPTI should also provide regular progress reports, track, and publish the expected and realized GHG emissions and other outcomes related to specific investments. NextGen supports Strategies 1.1 and 6.1 that focus on reducing vehicle miles travelled. As these strategies develop VMT reduction solutions, however, we recommend they also incorporate periodic reporting with metrics on VMT and GHG emissions for each program and/or actor. Clear targets for VMT and emissions reductions specific to each strategy will hold agencies accountable and prioritize projects that actively reverse the devastating trends of climate change and urban sprawl.

CAPTI should also include investments in light, medium, and heavy-duty zero-emission vehicle (ZEV) infrastructure to support the transition to ZEVs everywhere, but we must carefully consider how our past and present decisions about other forms of infrastructure -- including how we choose to allocate space for cars versus other forms of transportation -- affects equity and our ability to meet our climate targets. Therefore, NextGen supports developing an equitable prioritization of funding and assistance to transit agencies within Strategy 2.3; smaller and rural public entities will require the most support in their ZEV fleet transition and the Clean Fleet and Facilities Network Improvement project will be critical to their success.

Engaging communities and measuring projects and programs based on their ability to support our state's equity and climate goals is crucial to prioritizing funding in a thoughtful, equitable way. NextGen supports Strategy 3 that establishes the Transportation Equity and Environmental Justice Advisory Committee, develops an equity index, and strengthens community coordination. NextGen supports Strategy 7.1 to incentivize infill housing production near transit or other accessible forms of transportation to encourage mobility and reduce VMT in disadvantaged communities. This strategy would benefit from more enforceable language to ensure the programs effectively address housing and VMT reduction needs. We also support Strategy 2.5 on ZEV deployment in rural communities to ensure equity is at the forefront of transportation planning and ZEV deployment in disadvantaged communities.

By adopting these recommendations CalSTA can more thoughtfully prioritize transportation funding and put forward a stronger, more enforceable set of strategies in the final version of CAPTI. This plan is an important step for advancing climate action in California and NextGen strongly supports the direction this plan takes to reduce GHG emissions by at least 40 percent below 1990 levels by 2030. We look forward to the development of CAPTI in becoming a more actionable, measurable strategy and to continued conversations as the process moves forward.

Sincerely,



David Weiskopf

Senior Policy Advisor, NextGen California



Kami Peer

Policy Fellow, NextGen California