

May 18, 2021

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

**RE: Comments on Climate Action Plan for Transportation Infrastructure (CAPTI)**

Dear Secretary Kim,

Orange County Business Council (OCBC), the leading voice of business in Orange County, appreciates the opportunity to provide comments on the Climate Action Plan for Transportation Infrastructure (CAPTI). OCBC acknowledges the significant efforts by leadership and staff on preparing this plan. Sincere thanks to Secretary Kim for his responsiveness in meeting with OCBC leaders and to the California Transportation Commission (CTC), CalSTA and Caltrans teams for responding to the business community's requests for additional direct engagement and outreach workshops. However, despite willingness to engage with OCBC its partners more recently, the broader business and industry community should have been engaged by the State from the beginning of this process. These critical stakeholders, representing those on the ground moving goods and people through the state, offer valuable, critical insights and should have been given a much stronger role as advisors in the foundational development of CAPTI.

OCBC recognizes the importance of addressing global climate change as key to California and Orange County's environmental health, quality of life, and economic competitiveness. Greenhouse gas (GHG) emissions reductions are best achieved through a systematic and integrated approach across all sectors of the economy. The State's climate change goals should be pursued in a manner that does not also neglect California's housing goals, drive companies and jobs out of state, or disproportionately negatively impact disadvantaged communities. As CAPTI is presented, OCBC has significant concerns over the plan's impact on the ability to move people and goods throughout the state without such negative impacts on the economy. The plan's lack of specificity on how each strategy will impact funding and projects at the local level, what metrics to track implementation will be used, and the quantitative impact on jobs and economic output that vehicle miles travelled (VMT) reduction strategies will have, makes it very difficult to provide acute feedback on CAPTI. OCBC strongly recommends that CalSTA provide detailed insight into the data and modeling assumptions that informed the development of CAPTI's strategies as well as an economic and jobs impact analysis of the plan prior to its adoption and use.

Another overall concern is with CAPTI's impact on SB 1 funding. OCBC advocated strongly for the passage of SB 1 to ensure an adequate funding stream for maintaining holistic transportation systems. CAPTI indicates additional funding sources must be sought, but still there is language throughout the plan that raises concern that interpretation of CAPTI in the future could lead to diversion or re-prioritization of SB 1 funds for uses that were not the original intent. The Mineta Institute published a recent [report](#) that examined

the potential impact of the state's zero emission vehicle (ZEV) and reduced VMT goals on the current transportation funding structure. The report found that in a scenario where the state goals are reasonably achieved, transportation funding would be reduced on an annual ongoing basis by \$4 billion by 2040. The promise of SB 1 to California voters must be kept intact. Specific sources of new revenues to pay for CAPTI's strategies should be identified in the plan.

Because the language in CAPTI is general and open to interpretation on how the plan will be implemented, OCBC recommends that the timeline be extended from short- to mid- or even long-term, for strategies that reference "re-prioritization" or changing criteria or parameters for various programs, including strategies S1.1, S1.2, S1.4, S4.3, S5.2, S5.3, S6.3, and S7.1. During this extended time, OCBC recommends that CalSTA engage in discussions with the business community to determine how the language in CAPTI will affect projects in the pipeline and funding allocated for critical capacity-increasing projects.

OCBC also requests that for strategies that call for creation of working groups or advisory committees (including strategies S3.1, S3.3, S6.2, S6.3, and S7.2), the business and housing community be included as a participating stakeholder and/or invited to provide feedback to ensure the impacts of CAPTI's implementation on jobs and the economy are considered in consultation with the private sector drivers of goods movement and the overall economy. Also important to these stakeholder discussions is how energy reliability, electric and alternative fuel infrastructure needs, and capabilities of zero-emissions vehicle technologies will be taken into consideration.

OCBC requests that CAPTI include additional language that acknowledges how this plan will not impede efforts to address California's housing crisis. While strategy S7 discusses "actions to ensure transportation programming dollars help incentivize smart housing and conservation policies and decisions, while also supporting infill development," OCBC asks for further clarification on how these strategies could be adversely used against needed housing that does not meet this undefined criteria. This is especially concerning after now seeing examples, such as the County of San Diego, which is considering VMT mitigation fees for housing development of \$50,000 to \$2 million per dwelling unit, rendering many projects wholly infeasible. Important progress on climate action planning in transportation should not come at the expense of communities' ability to house people and workers.

Thank you for the opportunity to provide feedback on CAPTI. OCBC remains committed to working with CalSTA, CTC, and Caltrans on these important issues as we collectively plan for California's future environmental, social, and economic sustainability. Do not hesitate to contact me at [jward@ocbc.org](mailto:jward@ocbc.org) with questions.

Sincerely,



Jennifer Ward

Senior Vice President of Advocacy and Government Affairs