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

Via Email: CTP@dot.ca.gov

Re: Comment on Draft Climate Action Plan for Transportation Infrastructure

Dear Secretary Kim—

On behalf of our nearly 180,000 members in California, Sierra Club California submits these comments and recommendations regarding the public review draft of the Climate Plan for Transportation Infrastructure (CAPTI). We appreciate the work that has gone into the draft, and hope the final document will encourage policy makers at all levels of government, and residents of every community to take actions that will rapidly make our transportation system, safe, convenient, equitable and supportive of climate stabilization.

In a newly released paper, Professor Dan Kammen, the Chair of UC Berkeley's Energy and Resources Group, states that "long an innovator in this arena, California is falling behind in its climate leadership and would benefit economically and ecologically, and in terms of social justice, by establishing more aggressive totals that enable a carbon-negative economy." Our concern is that the transportation sector must make rapid and significant reductions in greenhouse gas (GHG) emissions and local air pollution. We urge you to assure that the final CAPTI is a robust contribution to our State's success in this critical effort.

The transportation sector is responsible for about 40 percent of emissions in California. The CAPTI must serve as a blueprint to pivot California toward less driving overall, as well as rapid expansion of the electric vehicle fleet. We commend your agency for presenting many thoughtful strategies, including the following:

- Prioritize funding from the Solutions for Congested Corridors Program to give travelers convenient alternatives to driving and reduce commute times.
- Identify a funding pathway to implement the State Rail Plan to move goods more efficiently.
- Increase funding available for the Active Transportation Program that will reduce vehicle miles traveled (VMT).
- Improve equity and environmental justice in transportation projects by establishing one or more advisory committees and working to reduce the combined cost of housing and transportation.
- Evaluate and prioritize transportation projects through use of an equity index
- implement an investment strategy that aligns transportation project nominations with the CAPTI Investment Framework
- Convene a roadway pricing working group that can reduce the subsidies that encourage driving.
- Incentivize infill housing production by leveraging transportation investments.

However, the Draft CAPTI suffers from a number of "business as usual" elements that, if included in

the final document could render it ineffective. We recognize that planners, developers, and labor organizations are accustomed to anticipating rising numbers of cars and trucks on California roads. However, as Senate Bill 375 (2008) recognizes, California must bring about significant *reductions* in VMT.

The following elements of the draft CAPTI detract from its ability to reduce VMT and therefore to reduce GHG emissions.

A — The plan merely seeks to assure that transportation projects do “not induce significant growth in VMT.” It lacks any clear acknowledgment that VMT must be significantly and rapidly *reduced*. As it stands, the plan, together with electrification of vehicles would be unlikely to meet Air Resources Board targets for reduction of GHG emissions.

Although more autos and trucks will be powered by batteries or hydrogen, we must recognize that significant GHG emissions result from the production of vehicles, batteries and from the roads that make driving possible. One analysis suggests that electrification of an average vehicle would only reduce its GHG emissions by about 55%.* (See, Lufthansa https://public.tableau.com/views/20191202_CO2byTransportVehicle/AVERAGECARBONEMISSIONSBYTRANSPORTMODE)

The CAPTI should expect the progressive shift to electric vehicles to only contribute one part of the necessary reduction of the Transportation Sector’s GHG emissions. The CAPTI cannot side-step the VMT reduction requirements of SB 375.

B — The expectation that CAPTI may allow for funding of many road-widening projects that are in the “pipeline” is also very concerning. First, steady reductions in VMT could render road-widening projects redundant, and a waste of public resources. Second, construction of more traffic lanes would induce more single-occupant driving, resulting in higher GHG emissions. A process must be devised to stop projects that would increase VMT unless they are already under construction.

C — The CAPTI doesn’t identify sources of adequate State funding for an integrated rail and transit network, safe bike and pedestrian paths, and transit to serve compact infill developments, nor does it set targets for reductions of VMT and GHG emissions to be obtained by various strategies. Although the 2022 State Budget might contain some funding to reduce the backlog of active transportation projects, a large number of other important projects would largely remain on their own to compete with non-transportation funding needs.

While the Sierra Club supports a speedy adoption of the CAPTI, there are several areas where it must be strengthened. Here are some specific steps that can be developed, either in the document or in its implementation process:

1 — Set milestones for VMT and GHG reduction. Big data can track annual changes in VMT on state highways in each region. Measures that lead to desired VMT reductions can be tightened or relaxed to achieve optimum targets for GHG emission reductions while avoiding negative impacts on community activity.

2 — Create a five or 10-year outlook for transportation funding that estimates the amount of state transportation spending for projects already under construction that will increase VMT and GHG emissions, estimate spending for active transportation and other projects that reduce VMT, and estimate spending for maintenance and safety projects that will emit GHGs but have little impact on VMT. The outlook could be refreshed every year or so to show funding changes for projects that affect VMT and GHG emissions.

3 — Make safety a goal rather than speed in designing and managing roads, especially roads that are used by cyclists and pedestrians. Pursue road diets wherever possible.

4 — Reduce subsidies for driving: convert existing freeway lanes to HOT (managed) lanes with tolls; establish cordon pricing; implement road user charges and reduce “free” parking. Use the revenues to support transit operations and bicycle-pedestrian paths. Stop funding road-widening projects, including projects that are in the “pipeline.”

5 — Educate agency staff and local policy makers about the hidden costs of low-density developments. Many city and county staff members and elected officials fail to understand the long-term costs of maintaining and rebuilding roads in places where the average housing density is less than 30 dwelling units per acre. The costs are usually far higher than the tax revenues generated by such developments.

6 — Identify statutory requirements for transportation funding that tend to increase highway capacities, and that will not be needed due to reductions in VMT. Advocates can then work on legislation to reform those requirements.

7 — Perform an analysis to assess the health costs and benefits of various transportation funding options and consider them in allocating funds.

8 — Accelerate the mode shift to rail for both passengers and freight to take advantage of the inherent energy efficiency of steel wheels on steel rail relative to rubber tires on pavement.

9 — Promote value-priced parking for public employees that rewards those who use active transportation, and that provides a model for employers in the private sector.

The actual reduction of VMT and GHG emissions will require several years of collaboration between Caltrans CTC, and local policy-makers. Caltrans staff is in regular contact with local public works directors and could take several steps to bring about VMT reductions. An early step would be to fully explain the rationale for SB 375, in calling for reductions in driving. Another step could be to describe the best practices to reduce traffic congestion, and to inform local policy makers of the ways that road-widening results in more traffic, not less.

City and county policy makers can be engaged in discussion of the fiscal and environmental benefits of reduced VMT and reduced gasoline and diesel fuel consumption. Goals for annual reductions in gasoline sales can be set, and targets for VMT reductions between 1% and 5% per year can be established. The goals and targets can be revised every 24 months or so, depending on actual performance in meeting long-term goals for VMT and GHG reduction.

The development of a CAPTI that enhances a declining VMT environment is an important step in California’s role as a leader in addressing the climate emergency. We appreciate the insights provided by the draft document. If you have questions about any of these comments, please contact me at 707-576-6632, or scbaffirm@gmail.com. Thank you for your attention to the above comments and suggestions.

Cordially,



Steve Birdleough, Chair

Sierra Club California Committee on Transportation & Sustainable Communities

cc; CTC
Caltrans