May 19, 2021

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

Re: Support for the Climate Action Plan For Transportation Infrastructure (CAPTI)

Dear Secretary Kim:

I am writing this letter in strong support for the Climate Action Plan For Transportation Infrastructure (CAPTI). We commend your office for its role in leading the state towards a just transition to a green economic recovery. Once implemented, CAPTI will create new avenues to support public health and economic opportunity across the state, while maximizing benefits for disproportionately impacted communities, low-income communities, and Black, Indigenous, people of color (BIPOC) communities in both urban and rural regions.

Since Governor Newsom signed Executive Order N-19-19 in September of 2019, the world entered a pandemic that further drove home the need for urgent action that advances equity, the environment, and the economy all at the same time. The interconnectedness of issues like mobility, job access, housing, and health make it possible for investments in these areas to help the State reach environmental, economic, and equity goals. CAPTI is a key vehicle to make measurable progress toward those complex goals. Also, over the last year, California’s municipalities showed they can move quickly to meet economic and mobility needs when public health is on the line. When CAPTI is implemented by all departments and agencies responsible for making transportation decisions, it will provide further alignment and support to local jurisdictions in those efforts.

Now is the time for California to invest in transportation projects that protect the climate and address systemic inequalities that historically harm, displace, pollute, and erase communities of color. CAPTI includes programs and strategies that do just that. TransForm especially supports the following provisions, with some suggestions to make them even stronger.

1. **We strongly support the “Highways to Boulevards” Conversion Pilot Program.** The closer this and other strategies align with federal objectives and become a high priority to our State’s departments and agencies, the more likely California will qualify for federal implementation funding. The American Jobs Plan includes a similar program that could provide funds, and there are many highways in California that could be excellent candidates for such a program. However, deep and authentic community engagement with impacted communities must be central to the program and specifically required and funded to ensure new investments meet the needs and desires of neighbors. Protections will also need to be put in place to make sure those projects don’t create new waves of gentrification and displacement, or if they do such impacts are mitigated.
2. **We applaud the inclusion of strategies to leverage transportation investments to incentivize infill housing production.** This provision acknowledges the direct connection between the location of housing and transit and the impact that has on our climate, our communities, and our economy. We want to see the combined cost of housing and transportation reduced for families struggling to make ends meet, and creating more affordable homes near jobs and transit is a key strategy to make this a reality. The Affordable Housing and Sustainable Communities program is an excellent model for this effort and could do more with additional revenue streams, particularly in parts of the state that need more transit infrastructure. This strategy also lines up with initiatives in the American Jobs Plan to incentivise the elimination of exclusionary zoning policies, creating further opportunities to bring federal dollars and needed change to the State.

3. **Critics say that people of color would be hit harder by road pricing or VMT charges, but TransForm’s research shows that the opposite can be true.** Our report, *Pricing Roads, Advancing Equity*, shows that road pricing can and must be designed with net benefits for low-income people and Black and Brown communities.\(^1\) Incorporating this approach into CAPTI will ensure a stronger framework to implement equitable congestion pricing strategies.

4. **Commute time is the single strongest factor in the odds of escaping poverty.** By improving transit and active transportation options and reducing traffic congestion, CAPTI will save commuters in every region valuable time and money. The Plan also has the potential to improve neighborhoods. Research from Harvard University shows the neighborhood where a person grows up determines their upward mobility.\(^2\) For example, the longer an average commute in a given county, the worse the chances of low-income families there moving up the economic ladder.

5. **CAPTI can and must ensure a just transition to a green economy.** We believe that it includes opportunities for good-paying union jobs in transportation, transit, construction, maintenance, and operations. CAPTI should not decrease infrastructure investment overall. Active transportation and Complete Streets projects are more labor intensive than traditional road projects.\(^3\) By funding more of these projects, especially in small and rural communities, it will provide good jobs in areas where they are sorely needed. CAPTI also recognizes the importance of the logistics industry and freight transportation in the state, and will support the development of a zero-emission freight transportation system, including charging infrastructure and other improvements along freight corridors. A just transition to a cleaner freight transportation system means protecting the jobs and economic contributions it provides to the State.

While a plan like CAPTI is long overdue, it cannot be where our innovation and strategies end. More funding is still needed to reach California’s climate goals through 2035. Although local and federal emergency aid spares time to coordinate the State’s recovery, emergency relief is not a long-term fix.

As an advocate in a non-profit focused on improving the quality of life for BIPOC populations as well as administering programs and developing policy strategies, I know the implementation of a plan like CAPTI is critical. Therefore, the California State Transportation Agency, the California Transportation Commission, the California Transportation Agency, the California

---

\(^1\) [https://www.transformca.org/transform-report/pricing-roads-advancing-equity](https://www.transformca.org/transform-report/pricing-roads-advancing-equity)


\(^3\) [https://www.pedbikeinfo.org/resources/resources_details.cfm?id=5168;](https://www.pedbikeinfo.org/resources/resources_details.cfm?id=5168) [https://www.pedbikeinfo.org/resources/resources_details.cfm?id=5160](https://www.pedbikeinfo.org/resources/resources_details.cfm?id=5160)
Department of Transportation, and the other agencies involved must continue to coordinate and communicate to ensure CAPTI is implemented in a powerful and impactful way.

TransForm looks forward to working with local communities, State departments and agencies, our coalition partners, and yourself as we all want to see CAPTI succeed — especially for the benefit of BIPOC populations. If you have any questions please feel free to contact me at JJackson@TransFormCA.org for further information.

Sincerely,

Jamario Jackson
Senior Community Planner, TransForm

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)