



May 19, 2021

Darwin Moosavi
Deputy Secretary for Environmental Policy & Housing Coordination
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Via email: capti@calsta.ca.gov

Subject: Health Comments on Climate Action Plan for Transportation Infrastructure

Dear Deputy Secretary Moosavi:

On behalf of the undersigned health and medical organizations, we are writing to provide comments on the Climate Action Plan for Transportation Infrastructure (CAPTI) development process. Our organizations view implementation of the CAPTI framework as an important opportunity to improve public health through more sustainable transportation and land use investments serving all California communities. Our comments intend to support the approval of the framework and highlight that the health, equity, sustainability and other vital goals envisioned by the CAPTI are dependent on robust implementation across many state agencies.

Largely due to the transportation sector, Californians face the most difficult air pollution challenges in the United States. California is home to seven of the ten most ozone-polluted cities in the United States, and six of the ten most particle-polluted cities according to the American Lung Association's [State of the Air](#) 2021 report.¹ The impacts of ozone and particle pollution include asthma attacks, heart attacks, strokes and a range of other respiratory and cardiovascular impacts. Particle pollution also contributes to lung cancer and is responsible for over 5,000 deaths per year in California, half of which are attributed to the transportation sector. These burdens are felt most acutely by people living with lung and heart conditions, children, seniors and lower-income communities and communities of color. Climate change impacts such as extreme heat, drought, wildfires and other effects worsen air quality and add a wide range of public health burdens and disparities.

¹ American Lung Association. State of the Air 2021. April 21, 2021. www.lung.org/sota

We strongly support the CAPTI framework’s prioritization of health, safety and equity in the vision for a more sustainable transportation system for all Californians. The transportation sector accounts for approximately 80 percent of ozone- and particle-forming NOx emissions and roughly half of the state’s climate-forcing greenhouse gas emissions.² Reducing transportation pollution in line with levels needed to achieve clean air and climate standards is vital to improving and protecting public health for all Californians through a mix of zero-emission technologies, reductions in vehicle miles traveled and increases in healthy, active transportation. In addition to the health benefits of cleaner air envisioned by the CAPTI framework, the health benefits of a shift from cars to transit and active transportation are substantial due to associated increases in physical activity and resultant reductions in obesity, cardiovascular disease, asthma and respiratory disease osteoporosis, and mental health problems. These benefits must be targeted to communities most impacted by past transportation projects that have divided, polluted and overburdened the most vulnerable Californians.

We appreciate that CalSTA has put forward a plan that maintains the Senate Bill 1 “fix-it-first” approach to transportation investments while advancing the health, sustainability and equity components of Governor Newsom’s Executive Orders N-79-20 and N-19-19,³ including through principles that reflect the urgency of actions to protect public health in all communities:

- *“... reducing public health and economic harms and maximizing community benefits to disproportionately impacted disadvantaged communities, low-income communities, and Black, Indigenous, and People of Color (BIPOC) communities...”*
- *“... reduce fatalities and severe injuries of all users towards zero...”*
- *“Promoting projects that do not significantly increase passenger vehicle travel, particularly in congested urbanized settings where other mobility options can be provided and where projects are shown to induce significant auto travel. These projects should generally aim to reduce VMT and not induce significant VMT growth.”*
- *“Promoting compact infill development while protecting residents and businesses from displacement...”*
- *“Developing a zero-emission freight transportation system...”⁴*

We are heartened by the focus of many state agencies on improving and protecting community health through new planning processes (e.g., CAPTI, Mobile Source Strategy, California Transportation Plan 2050). In order to achieve the vision of meaningfully building health and equity into the transportation system, we therefore urge CalSTA to approve the CAPTI framework and work closely with sister agencies to quickly implement the plan:

- CalSTA should work with the ***California Transportation Commission*** and ***CalTrans*** to undertake an immediate review of proposed projects, guidelines and investment strategies for consistency with the CAPTI framework. All projects - including those currently in funding pipelines and project lists - should be evaluated for contribution to air and climate pollution reductions needed to protect public health, consistency with the

² California Air Resources Board. Revised Draft Mobile Source Strategy. p. 73. April 2021. “... mobile sources were responsible for 80 percent of statewide NOx and 40 percent of statewide GHG emissions when excluding emissions from the production of fuels that power them.” https://ww2.arb.ca.gov/sites/default/files/2021-04/Revised_Draft_2020_Mobile_Source_Strategy.pdf

³ Executive Order N-19-19 (Sept. 2019) included a significant focus on aligning transportation investments with achieving California’s climate standards through projects that protect public health and reduce vehicle miles traveled (VMT), while also promoting electric transportation. Executive Order N-79-20 (Sept. 2020) includes a heavy focus on accelerating the transition to zero emission cars, drayage trucks, medium- and heavy-duty vehicles and off-road equipment, while also directing more near-term transportation projects to promote alternatives to driving.

⁴ California State Transportation Agency. Climate Action Plan for Transportation Infrastructure (CAPTI). Guiding Principles at (pp.15-16). <https://calsta.ca.gov/-/media/calsta-media/documents/capti-2021-calsta.pdf>

equity and VMT reduction goals of CAPTI, and considered for revision/replacement with project elements/new projects aligned with the CAPTI. [Strategies S1.1-.2, S1.4, S3.3, S4.1-4.6]

- CalSTA should partner with the **California Department of Public Health** to build upon the April 22, 2021 Public Health Work Group (PHWG) discussion of the CAPTI to further coordinate to evaluate the public health and equity impacts and benefits of transportation and land use planning and investment strategies in terms of air quality, safety and physical activity. As discussed at the April 22 PHWG meeting, the Integrated Transportation Health Impact Model (ITHIM) is an important tool available to highlight the health benefits of the shift to healthier, more sustainable transportation system that supports attainment of health-protective climate standards.⁵
- CalSTA should support the **California Air Resources Board** in fully incorporating the benefits of the CAPTI framework within the upcoming Scoping Plan and State Implementation Plan processes, as CARB has begun with the latest draft Mobile Source Strategy. CalSTA and CARB should play an important role in coordinating state agency actions to strengthen and meet regional greenhouse gas reduction targets, reduce VMT and improve healthier transportation options within the 2022 Scoping Plan process, which will need to achieve a 25% reduction in statewide VMT per capita by 2035 relative to 2005. [Strategies S6.S, S6.3]
- CalSTA should consult with and coordinate zero-emission infrastructure investments with the **California Energy Commission's** Clean Transportation Program team to maximize efficacy of funding opportunities. The Energy Commission “will seek to provide 50 percent of Clean Transportation Program funds from this investment plan toward projects that benefit low-income and disadvantaged communities.”⁶ We urge CalSTA coordinate with CEC to ensure zero-emission infrastructure investments are both made in and provide benefits to the residents of these communities. [Strategy S4.6]
- **Tracking Progress and Ensuring Accountability** We appreciate CalSTA’s draft plan including accountability measures in terms of regular reporting through public hearings and other methods. In addition, we recommend that CalSTA coordinate with **CARB, CDPH and the Office of Environmental Health Hazard Assessment (OEHHA)** to develop:
 - o A user-friendly, accessible online dashboard illustrating quantitative and qualitative information as to changes in vehicle miles traveled, greenhouse gas emissions, criteria air pollutants, single occupant vehicle use, active transportation and transit, public health, equity and other factors associated with changes made following implementation of the CAPTI, with specific reference to the location of these benefits in regards to low-income communities, communities of color and disadvantaged communities, and Healthy Places Index.⁷
 - o The metrics noted above should be considered as a minimum starting point for CAPTI reporting as well as for a broader transportation health analysis framework to be developed in coordination with the CDPH as noted above.

⁵ California Department of Public Health. California Integrated Transportation Health Impacts Model (ITHIM). Accessed May 10, 2021. <https://skylab.cdph.ca.gov/HealthyMobilityOptionTool-ITHIM/#RunITHIM>

⁶ California Energy Commission. 2021-2022 Investment Plan Update for the Clean Transportation Program

⁷ The California Healthy Places Index (HPI) provides a composite score based on 25 indicators of community conditions that influence health outcomes and predict life expectancy. It is already utilized by several transportation grant programs (e.g., Active Transportation, Sustainable Transportation Planning, Adaptation Planning) and other state programs. More information: <https://healthyplacesindex.org/>

In closing, it is clear that California will not achieve climate, health, equity, conservation and other critical goals without a shift in land use and transportation planning and investments. The CAPTI framework is an important point of departure for many state agencies to coordinate implementation and set the course toward a more sustainable transportation system that serves all communities, and leaves no communities behind.

We look forward to continuing to work with CalSTA and throughout the local, regional and state governments to achieve healthy air, a sustainable climate and better health for all Californians.

Sincerely,

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