



December 8, 2023

Secretary Toks Omishakin
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814
Via email

RE: 2023 Climate Action Plan for Transportation Infrastructure (CAPTI) Progress Report

Dear Secretary Omishakin,

Thank you for the opportunity to comment on the draft 2023 progress report on the Climate Action Plan for Transportation Infrastructure (CAPTI). We appreciate CalSTA's commitment to developing and implementing the CAPTI framework and recognize that progress is being made on the metrics included in the document.

Despite decades of clean air progress, 98 percent of California's population still lives in a community impacted by unhealthy levels of ozone ("smog") and/or fine particle ("soot") pollution and associated health risks.¹ Children, seniors and people living with lung and heart illnesses are at greater risk to the harms of unhealthy air. Significant disparities also exist in terms of local pollution burdens on lower-income communities and communities of color impacted by land use decisions that place major pollution sources – often transportation-related – in vulnerable communities. Climate change is amplifying these health risks and disparities and accelerating conditions for unhealthy air among a suite of public health risks challenging Californians. The majority of ozone- and particle-forming oxides of nitrogen (NOx) emissions in our state come from transportation sources, which are also responsible for the greatest share of climate pollution in the state.

While the first iteration of the CAPTI was limited to alignment of approximately \$5 billion in discretionary transportation funds, a much more comprehensive approach to transportation is needed if California is to achieve clean air and climate standards. Because of this, we welcome CalSTA's plan to review CAPTI for updates next Spring. The public health, environmental justice and climate consequences of the transportation sector demand a broader application and heightened urgency of the alignment envisioned in Executive Order N-19-19. As CalSTA moves to the 2024 review of CAPTI, we encourage the following areas of focus:

Apply the CAPTI framework to beyond the discretionary funds included in the initial CAPTI program. The CAPTI progress report notes that even within programs included in the framework, funding remains available to projects that will increase vehicle miles traveled and associated pollution impacts. Beyond those initial funding programs, the laudable vision of the CAPTI framework does not apply. This means that far more investments are made without even a screening for alignment with California's vision for health, equity and sustainability than are reviewed through the framework. CAPTI should be applied more broadly across a wider range of public funding programs with clear tracking in terms of VMT,

¹ American Lung Association. State of the Air 2023. April 2023. www.lung.org/sota

greenhouse gases, smog-forming emissions, fine particles and other health-harms should be incorporated beyond the metrics included in the current review.

We note the recent California Air Resources Board (CARB) report documenting the ongoing challenges in implementing California's Sustainable Communities and Climate Protection Act (SB 375, Steinberg, 2008), which stands in contrast to the progress noted in CalSTA's draft CAPTI report, though each report highlights the need for better alignment of state funds with meeting climate standards. The Administration must act much more quickly to shift public funding away from pollution-spiking investments toward those that support attainment of federal clean air standards and meeting daunting vehicle miles traveled targets needed to attain California climate standards:

"Specifically, federal, State, and local transportation funding sources need better alignment with State objectives around climate and equity, and both new and existing funding sources should be designed in ways that are sensitive to community needs and flexible to change. Key opportunities to respond to these challenges include reimagining roadway projects that increase VMT, improving access to funding for multimodal projects, and prioritizing community needs."²

Recognize more stringent clean air and climate standards in CAPTI review. Since the initial CAPTI was developed, California has included more ambitious VMT reduction requirements to achieve climate standards, and federal standards for health-protective limits on pollution have been proposed. California must review and update its approach to reducing harmful emissions holistically and can no longer afford investments that push the state "in the wrong direction, away from advancing climate goals and showing worsening inequality."³ California's guiding documents for attaining health-protective clean air and climate standards are clear about the urgency of reducing emissions from the light-, medium- and heavy-duty vehicle sector both in terms of zero-emission technologies but also VMT reduction strategies.

- The State Implementation Plan for Ozone illustrates that increasing mobile source emissions represent a threat to achieving clean air standards and that reducing VMT is "necessary to directly and immediately reduce mobile source NOx and ROG emissions..." and "necessary to achieve federal air quality standards."⁴
- California's Climate Change Scoping Plan notes that "California is not on track to meet its associated climate goals under SB 375"⁵ and set major reductions in VMT into the plan to meet 2030 statutory standards and longer-term carbon neutrality.

State and local agencies must coordinate to ensure greater focus on sustainable land use and transportation planning that prioritizes health, equity and sustainability over capacity expansion and other pollution-inducing investments and project approvals is crucial to healthier communities.

² CARB. 2022 Progress Report on California's Sustainable Communities and Climate Protection Act (SB 150 Report) at p. ES vi. June 2023. <https://ww2.arb.ca.gov/sites/default/files/2023-05/2022-SB150-MainReport-FINAL-ADA.pdf>

³ CARB. 2022 Progress Report on California's Sustainable Communities and Climate Protection Act (SB 150 Report) at p. ES iii.

⁴ CARB 2022 State Strategy for the State Implementation Plan at pp. 72-3. September 2022.

https://ww2.arb.ca.gov/sites/default/files/2022-08/2022_State_SIP_Strategy.pdf

⁵ CARB. Climate Change Scoping Plan. Appendix E at page 4. November 2022. <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-e-sustainableand-equitable-communities.pdf>

In closing, we appreciate that CalSTA continues to report on progress in the draft CAPTI report and it is poised for a 2024 review of CAPTI. We look forward to the ongoing dialogue on shifting focus to a healthier, more equitable and more sustainable transportation system in California. Please contact me with any questions and thank you for considering our perspective.

Sincerely,

A handwritten signature in blue ink that reads "Will Barrett". The signature is fluid and cursive, with the first name "Will" and last name "Barrett" clearly distinguishable.

Will Barrett
National Senior Director
Clean Air Advocacy

