

ClimatePlan

COALITION FOR
CLEAN AIR





PolicyLink



November 2, 2022

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

RE: Public Comments on the Draft Climate Action Plan for Transportation Infrastructure (CAPTI) 2022 Annual Progress Report

Dear Secretary Toks Omishakin,

The undersigned organizations appreciate the opportunity to provide comments on the draft 2022 CAPTI Annual Progress Report. Since adopted, CAPTI has been a useful framework in aligning our annual \$5+ billion transportation budget with the state's climate, health, and equity goals. We thank the CalSTA leadership and staff for the work to create and implement CAPTI.

We appreciate the enthusiasm to complete the actions and strategies outlined in CAPTI but find that the way that the Progress Report designates progress is misleading. While CAPTI is a pivotal part in directing state agencies, the effort to align transportation spending, climate change, equity and public health is a long and complicated task. To indicate that 88% of strategies are completed or underway does not accurately reflect this complexity. While it is important to complete strategies and actions, these actions must lead to implementation and material changes.

The success of CAPTI should be measured by the proportion of transportation investments that are reducing emissions, promoting public health, and equitably investing in communities. While it is important to complete strategies and actions, these actions must lead to implementation.

We would like to offer some overarching thoughts about CAPTI implementation thus far.

- **Reevaluating Progress:**

Indicating a strategy as completed does not accurately reflect the status of implementation. In many cases, items being added to guidelines or discussed in meetings are counted as complete when in reality this is only the first step in a multi-phase process.

- **Transparency around investments:**

CAPTI should focus state investments and provide an impetus to divert money from projects that adversely impact communities of concern to projects that benefit the environment, economy and public health. In future progress reports, we would like to see a breakdown of investments.

- **Updating CAPTI:**

As a living document, there must be plans to update strategies and actions. The process to update CAPTI should be outlined and transparent.

Below we offer our feedback on CAPTI's progress report for specific actions:

S2.1 Implement the California Integrated Travel Project (Cal-ITP)

While we strongly support encouraging Californians to use public transit through novel programs such as the California Integrated Travel Project, we believe CalSTA's progress in implementing this program is not enough to consider it complete at this moment in time.

The Draft Progress Report states that CalSTA has successfully integrated Cal-ITP within the cycle 5 TIRCP guidelines by including it within the primary evaluation criteria. However, simply including the program within the guidelines does not guarantee that all projects funded by the TIRCP program will consider implementing Cal-ITP. This is especially showcased in the Draft Progress Report, which states that only 6 out of 23 projects included Cal-ITP within the project scope. If we want to ensure we are increasing public transportation ridership by improving the rider experience, we need to ensure that all of the projects funded by TIRCP include Cal-ITP implementation. Additionally, with cycle 5 funding only awarded in the summer of this year, it is too early to tell whether the Cal-ITP projects had any effect on growing ridership. We would recommend that CalSTA track the progress and outcomes of those projects to ensure that this action is successfully encouraging the use of the public transportation system. Until all of TIRCP projects include Cal-ITP implementation and the outcomes of those projects show a successful mode shift, we ask that CalSTA mark this action as underway.

S2.4 Increase Funding to Active Transportation Program (ATP)

We commend the agency for securing an additional one-time infusion of \$1.05 billion from the state's General Fund for ATP. In addition to securing funds, the agency did a great job on hosting public stakeholder meetings to help determine how funding would be utilized for ATP-Cycle 6. As this action is marked underway, we ask the agency to have specific plans for securing additional funding for ATP.

S3.2 Strengthen and Expand Coordinated, Targeted Technical Assistance on State Transportation Funding Programs

We see technical assistance as a necessary step in ensuring that community voice and needs are at the forefront of project creation and implementation. Transportation program project lists are littered with legacy projects that do not have communities top of mind. We do not want to continue to add to these lists. We urge Caltrans to prioritize this strategy by designating funding and CBO partners that can facilitate technical assistance.

S3.4 Develop and Utilize the Equity Index to Assist in Evaluation or Prioritization of Caltrans Projects

We are concerned that the Equity Index, as currently described, does not go far enough in accomplishing the goals it had set out to do.

The current version of the Equity Index identifies priority population areas based on those communities' transportation barriers. While it is a noble goal, it is vastly different from what was stated as the original purpose of the Index, which was to analyze the equity impacts of transportation projects. Specifically, the original Climate Action Plan for Transportation Infrastructure (CAPTI) describes the Equity Index as a “tool to assist in the evaluation and prioritization of the department’s projects.”

Additionally, we are concerned that the current Equity Index is very similar to existing tools. The California Transportation Commission acknowledged this in the documents they prepared for the discussion of the Equity Index, stating, “the EQI resembles some existing equity tools, such as CalEPA’s CalEnviroScreen and the White House’s Climate and Economic Justice Screening Tool (CEJST).” While the document lists the differences, mainly EQI’s focus on transportation barriers and examining census data on a different scale, the outcome of the tools is similar: they all identify communities facing adverse transportation impacts. Having the Equity Index focus on examining projects instead of populations would have offered a novel way to determine whether California is equitably distributing its transportation funding. For these reasons, we ask Caltrans to revert the Equity Index to its original goal.

S6.1 Explore New Mechanisms to Mitigate Increases in Vehicle Miles Traveled (VMT) from Transportation Projects.

In future iterations of CAPTI, we hope to see this strategy strengthened and expanded. While the VMT Mitigation Playbook is a great tool, VMT mitigation needs to be institutionalized as a necessary policy moving forward.

S7.3 Explore a “Highways to Boulevards” Conversion Pilot Program

The 2022-2023 Fiscal Budget allocated over \$10 billion to various transportation priorities and projects. One of those programs was the Reconnecting Communities: Highways to Boulevards Pilot Program, which was awarded \$150 million to convert underutilized highways to multimodal boulevards and help bridge separated communities. While this is a major accomplishment and a

great step in encouraging the use of non-auto modes, it is too early to mark this project complete at this time.

The U.S. transportation system has a history of displacing low-income and people of color neighborhoods to build highways. This is especially true of California, which has displaced over 10,000 families in the last 30 years due to highway expansions. While the Highway to Boulevard Pilot Program will test out a way to rectify the situation and reunite communities, the work should not stop there. CalSTA should plan for how this program will expand outside of the pilot, which would include the need for securing additional long-term funding. The Draft Progress Report also states that while the initial funding has been secured, there is still work to be done in developing and finalizing the guidelines, which will only begin in fall 2022. Those guidelines would need to go through a rigorous and equity-focused public engagement process to ensure projects being funded would accomplish the goal of the program. Finally, the Highways to Boulevards program needs to identify and quantify metrics in order to ensure that the program has achieved the intended outcome. Thus, we ask that this action is marked as underway until it manages to secure long-term funding, finalize guidelines, and measure anticipated outcomes.

S8.2 Deploy Tools To Analyze CAPTI progress

We commend CalSTA and Caltrans for creating metrics to track the progress of CAPTI. We are pleased to see that metrics are being added to CAPTI's strategies and actions.

S8.4 Lead CAPTI interagency Implementation Working Group

We would like to see more transparency around the interagency workgroup and the inclusion of more diverse voices. While the agencies are tasked with the completion of this, advocates, CBO's, MPOs and other stakeholders can lend valuable input to ensure that implementation is successful.

We see CAPTI as a powerful framework to shift transportation funding, but would like to see improvements in how progress is evaluated, transparency around how investment decisions are made, and a plan for updating CAPTI. CAPTI actions and strategies are bold and necessary but they must lead to a vision of a transportation system that is healthy, equitable, accessible, and dare we say vibrant for all.

We appreciate this opportunity to comment and look forward to working together on CAPTI implementation.

Sincerely,

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