



30 October 2024

Chair Carl Guardino and Commissioners  
California Transportation Commission (CTC)  
1120 N Street MS 52  
Sacramento, CA 95814

Chair Liane Randolph and Board Members  
California Air Resources Board (CARB)  
1001 I Street  
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Director Gustavo Velasquez  
California Department of Housing & Community Development (HCD)  
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**Re: ClimatePlan Coalition Comments on the Climate Action Plan for Transportation Infrastructure (CAPTI) Action Plan Update**

Dear CTC Commissioners, CARB Board Members, and HCD Director Gustavo Velasquez,

Thank you for the opportunity to provide feedback on the update to the CAPTI Action Plan. On behalf of the undersigned organizations, we're pleased to share the following comments.

Our organizations welcomed Governor Newsom signing Executive Order N-19-19 to align our transportation investments with our climate goals. Our organizations have worked hard to help realize that work in partnership with CalSTA, CTC, and partner agencies through our policy analysis and advocacy, and through legislative actions. We are grateful to Governor Newsom for signing AB 2086 and SB 960, which will further build on this foundation.

We also have observed that the first wave of work under CAPTI has led to an improvement in the quality of the projects being selected regarding their climate alignment, i.e. more investment in transit, active transportation and electrification, and less in highway capacity expansion. This has delivered benefits to climate, air quality and equity, and we are very grateful to see the CalSTA-commissioned analysis from the Mineta Transportation Institute showing that these investments have maintained a high level of quality job creation.

We strongly support updating the CAPTI Action Plan to build on the progress achieved so far and identify new priority activities. This next wave of policy action under CAPTI presents the opportunity to close the remaining gap between our climate goals and our investments, so our state can make an all-in commitment to clean transportation. We support the proposed actions in the draft CAPTI Action Plan Update referenced in the September 2024 CAPTI [workshops presentation](#), and recommend strengthening them in the following areas.

### **Strategy 1: Transforming the Future of the State Highway System**

We support the use of pricing in an equitable manner to prioritize high occupancy vehicles and transit and improve the efficiency of the highways system, but we urge that **investments focus on converting general purpose and HOV lanes to express lanes and not continue to expand the highway system by adding new lanes**. According to available research, a newly-built managed lane project has the same induced VMT impacts as building a general-purpose lane<sup>1</sup>. In fact, in some cases, the VMT impact can be higher for new managed lanes as they experience less congestion. The construction cost of lane conversion is lower than the capital cost for newly constructed HOT/toll lanes, so there will be more “excess” toll revenue available to invest in sustainable modes. We recommend that all funding generated by priced managed lanes be spent on improving mobility choices such as biking, walking, transit capital projects and transit operations (including service increases, reliability improvements and fare discounts) in the communities adjacent to the corridor.

In addition, we were thrilled that Governor Newsom signed SB 960 into law this year and acknowledged that implementation of complete streets and transit priority on the state highway system is a critical priority. We urge CalSTA, CTC, and Caltrans to accelerate implementation of key provisions of SB 960 in line with several of the new actions proposed in the CAPTI Action Plan Update, specifically:

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<sup>1</sup> Manville, M. (2024) Induced Travel Estimation Revisited *UCLA Institute of Transportation Studies*  
<https://escholarship.org/uc/item/8m98c8j1>

- Adopt a transit priority Director's policy as soon as possible and **identify priority locations to implement transit priority infrastructure on the state highway system** to enhance the frequency of service and increase ridership, and
- **Set spending goals for bike, pedestrian, and transit infrastructure relative to the level of mode shift that must be achieved to reach CARB Scoping Plan targets** for reduction of vehicle-miles traveled (VMT).

## Strategy 2: Reducing Greenhouse Gas Impacts of Transportation Investments

**We strongly support making projects that mitigate their passenger VMT impacts more competitive for Trade Corridor Enhancement Program (TCEP) funding, and recommend that TCEP guidelines be clear in requiring that the same measure for truck VMT be consistently used to support claims for truck throughput as well as air quality impacts.**

TCEP continues to be the transportation program that funds the most VMT-increasing projects as demonstrated by the Mineta Transportation Institute study, and we have serious concerns about how agencies cherry-pick certain sets of modeling data to inflate claims of goods movement benefits, while use other conflicting data sets to downplay air pollution impacts. Diesel trucks are the largest mobile source of criteria air pollutant emissions<sup>2</sup>, and pollutant emissions from freight have increased more than 50% since 1990 due to increased freight traffic<sup>3</sup>. By encouraging passenger VMT mitigation and clearer standards for accounting of benefits and impacts, the TCEP program will be able to better identify projects that support cleaner and more efficient goods movement and increase transparency to the public regarding the benefits of those projects.

In addition, we **strongly support the requirement that projects funded by the Solutions for Congested Corridors Program (SCCP) must have a VMT-neutral impact and urge that this requirement be applied to the impacts of individual projects instead of the entire program.** Despite the SCCP's goal to reduce congestion, this program still results in significant increases in VMT which will ultimately worsen traffic congestion. Requiring that all funded projects reduce VMT or be VMT-neutral would ensure SCCP is effectively reducing congestion over the long term, while also reducing greenhouse gas and air pollution emissions.

## Strategy 3: Delivering Equitable Outcomes

We strongly support the action to establish a Director's Policy to avoid direct displacement of homes due to highway expansion projects, and **we urge Caltrans to not just reduce but to entirely avoid the takings of both homes and businesses in disadvantaged communities for highway expansion.** Highway expansions increase pollution, traffic safety risks, and noise, as well as cause both direct and indirect displacement in communities already most burdened by environmental injustices and by our state's housing crisis. Beyond the direct physical displacement of homes and businesses from new or expanded infrastructure, transportation

<sup>2</sup> *California Air Resources Board* (2020) California takes bold step to reduce truck pollution <https://ww2.arb.ca.gov/news/california-takes-bold-step-reduce-truck-pollution>

<sup>3</sup> *U.S. Department of Transportation* (2015) Clean Freight <https://www.transportation.gov/mission/health/clean-freight>

investments of all types could risk increasing rents and pushing vulnerable residents out of their communities. We recommend that CalSTA also consider a policy to mitigate indirect displacement impacts of transportation investments with strategies to preserve and augment affordable housing and commercial space in proximity to those investments.

#### **Strategy 4: Improving Transparency and Accountability**

We were also thrilled that Governor Newsom signed AB 2086 this year, requiring an updated data dashboard and transparency for the public on the beneficial outcomes from CAPTI programs. We strongly support the new actions proposed in the CAPTI Action Plan Update on increasing transparency and accountability on projects underway as well as the outcomes of state investments. As advocates, we rely on transparent data and accountability processes to monitor and push forward the state's progress toward climate and equity goals.

Thank you for your consideration. Please contact Jeanie Ward-Waller on behalf of ClimatePlan ([jeanie@fearlessadvocacy.com](mailto:jeanie@fearlessadvocacy.com)) with any questions.

Sincerely,

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