



November 4, 2022

Darwin Moosavi
Deputy Secretary for Environmental Policy & Housing Coordination
California State Transportation Agency
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Submitted via email: CAPTI@calsta.ca.gov

RE: Health Comments on Climate Action Plan for Transportation Infrastructure Report

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) first annual progress report. We have provided ongoing support for the development of CAPTI and applaud the attention that this important process has gotten from state agencies. As the California State Transportation Agency (CalSTA) and other agencies continue to implement the strategies and actions outlined in CAPTI, we urge you to continue to prioritize transportation funding for projects that improve health by supporting more active transportation and reduce spending on projects that add to harmful climate change and air pollution burdens.

The transportation sector is the leading source of pollution and a major reason why Californians face the most difficult air pollution challenges in the United States. California is home to six of the ten most ozone-polluted cities in America and eight of the ten American cities most impacted by unhealthy particle pollution days according to the American Lung Association's [State of the Air 2022](#) report. The annual CAPTI Progress report is critical to understanding if the plan is helping us meet California's climate goals and reduce emissions from the transportation sector, and where relevant agencies can move beyond the first plan to build a healthier, more

sustainable transportation system for all Californians. This is especially important for California's most disadvantaged and low-income communities most impacted by medium and heavy-duty truck pollution and lack of healthy mobility options and infrastructure.

Strengthening CAPTI framework over time

The draft report states that 88% of the actions are completed or underway with a short-term timeline of zero to three years to complete, but the draft also notes that "many programs have not yet awarded projects or integrated program guidelines following the adoption of CAPTI, so data is not available in this progress report." We look forward to future reports and a comprehensive tracking of changes made to state programs, guidelines and actual shifts in funding priority that reflect the intent of Governor Newsom's Executive Order N-19-19 and the CAPTI framework itself.

At the end of this legislative session, the Governor was presented with Assembly Bill 2438 (Friedman, 2022) which would have codified the alignment of transportation funding guidelines with the CAPTI framework. Contrary to the recommendations of public health, clean air and sustainable transportation advocates, the Governor vetoed this bill noting that CalSTA will "[review] outcomes and integrate public feedback in future years to make modifications to CAPTI... to meet the needs of the statewide transportation system." While extremely disappointed in the veto, we look forward to ongoing modification of the CAPTI framework to move beyond the initial implementation stages that are well underway to the transition of funds away from polluting projects and to healthier, more equitable and sustainable transportation systems.

Metrics: Tracking Health Outcomes

As CalSTA and related agencies continue to implement strategies outlined in the CAPTI plan, we appreciate the goal to develop a set of metrics to track and understand improvements made in the transportation sector to improve health. Changes in local, harmful pollutants, changes in VMT and associated health outcomes, and financial, programmatic and project-level changes made in response to CAPTI must be reported to the public as the main outcome of implementation. As the Mineta Transportation Institute develops and tracks metrics for qualitative and quantitative outcomes, we offer the following comments:

- **VMT Metric:** We support the inclusion of Vehicle Miles Traveled (VMT) in the proposed metrics list as a critical public health consideration.
 - The Department of Public Health hosts the ITHIM health impacts model based on changes in travel behavior and a wide range of health outcomes that should also be considered as part of the VMT metric.
- **Local Pollutant Metric:** In addition to tracking climate pollutants, we strongly recommend including metrics related to changes in local air pollutants such as oxides of nitrogen (NO_x), fine particles (PM_{2.5}) and overall diesel particulate matter (DPM) to illustrate changes in harmful (and disparate) exposures to transportation pollutants and associated health outcomes where possible.

- Reducing greenhouse gases is critical to health but there are also direct health opportunities from reducing local health burdens – and health disparities – that are not being captured in the proposed climate metrics noted in the draft report.
- **Investment Metric:** We also recommend specifically tracking shifts in investments to programs and projects that reflect the CAPTI framework, and changes made to legacy projects to better align with the current understanding of our pollution, climate and equity crises.
 - The intent of CAPTI is to set a framework to better align transportation funding with climate, health, equity and sustainability: the metrics and reporting must clearly demonstrate that alignment.

Support Development of Projects that Reduce Pollution and Boost Active Transportation

We urge CalSTA and other related agencies to ensure all guidelines and funding cycles only support VMT-reducing projects and reduce reliance on combustion engines, support vehicle electrification and active transportation options to curb harmful pollution and improve community health. Also, as new funding cycles for programs associated with the CAPTI framework are rolled out, we ask that you continue to provide technical assistance so local government, non-profits, and transit agencies can implement innovative transportation projects that help us achieve our climate goals – including the elevated targets for land use and transportation included in the draft Climate Change Scoping Plan being developed for adoption by CARB this Fall.

We look forward to continuing to work with CalSTA and other agencies to ensure the goals outline in CAPTI are achieved and community health is improved throughout the process. Please contact William Barrett for any questions, William.Barrett@Lung.org.

Sincerely,

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