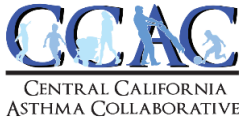




CA-NURSES
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March 10, 2022

Lee Ann Eager, Chair
California Transportation Commission
1120 N Street MS 52
Sacramento, CA 95814
via email: ctc@catc.ca.gov

Subject: Comments on CAPTI Implementation in re: SHOPP program

Dear Chair Eager and Commissioners:

As members of the health and medical community in California, we are writing to provide comments on the pending discussion of the State Highway Operations and Protection Program (SHOPP) 2022 projects cycle and guidelines. Transportation decisions are ultimately public health decisions, and we urge the Commission to carefully consider the Climate Action Plan for Transportation Infrastructure (CAPTI) goals for health and health equity within all decisions.

Californians face the most difficult air pollution challenges in the United States, with over 90 percent living in communities impacted by unhealthy levels of pollution. California is home to seven of the ten most ozone-polluted cities, and six of the most particle-polluted cities in the United States according to the American Lung Association's State of the Air 2021 report. The impacts of poor air quality include asthma attacks, heart attacks and strokes, lung cancer and premature death. The burdens of unhealthy air fall most heavily in lower-income communities and communities of color, both in terms of exposure to harmful air and associated health impacts. In California the vast majority of ozone-forming pollution is generated by the transportation sector, as is over half of greenhouse gases that cause climate change. Ongoing increases in vehicle miles traveled continue to counteract progress on curbing pollution.

Recognizing the need for healthier, more equitable, safer, and climate-friendly transportation investments, Governor Newsom directed the California State Transportation Agency (CalSTA) to develop

a plan to align \$5+ billion in state transportation funding toward these goals. The CAPTI framework was completed in July 2021 and laid out key goals for addressing “social and racial equity by reducing public health and economic harms and maximizing community benefits” as well as implementing “projects that do not substantially increase passenger vehicle travel.” The \$4.2 billion SHOPP process is the first (and most substantial) implementation test of the CAPTI framework.

Ultimately, CAPTI goals must now be central to SHOPP guidelines and project lists. Prior to adoption, the California Transportation Commission should clearly illustrate actions demonstrating alignment with CAPTI, including:

- That future SHOPP funded projects, as expressed through the Guidelines update, will incorporate CAPTI strategies as well as health, equity and other goals.
- That the development and implementation of the programs that feed into the SHOPP, such as the Transportation Asset Management Plan, will also incorporate CAPTI strategies.
- That the annual performance report shall include a section outlining progress towards implementing strategies in the CAPTI framework and other health and equity goals.
- That the public has adequate access to data and robust opportunities for input on the proposed SHOPP project lists, including clear metrics for alignment with CAPTI goals.

We urge the Commission to ensure 2022 and all future cycles of SHOPP projects and guidelines reflect the intent of the CAPTI to protect and improve health and reduce disparities. Please contact Will Barrett at William.Barrett@Lung.org for any additional information.

Sincerely,

Will Barrett, Senior Director, Clean Air Advocacy
American Lung Association

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