



April 15, 2021

David Kim, Secretary
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

Interagency Working Group on the Climate Action Plan for Transportation Infrastructure
c/o California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

via email: capti@calsta.ca.gov

RE: Comments on the Draft Climate Action Plan for Transportation Infrastructure

Dear Secretary Kim and Interagency Working Group Members:

Thank you for the opportunity to comment on the California State Transportation Agency's draft Climate Action Plan for Transportation Infrastructure (CAPTI). The Coalition for Responsible Transportation Priorities (CRTP) is a non-profit organization located on California's North Coast. Our mission is to promote transportation solutions that protect and support a healthy environment, healthy people, healthy communities and a healthy economy on the North Coast.

CRTP strongly supports the CAPTI's explicit recognition of, and focus on, the need to reduce vehicle miles traveled (VMT) to address the climate crisis. We also strongly support the CAPTI's focus on addressing historical and ongoing inequities in the transportation system. We thank the Interagency Working Group members for putting VMT, mode shift and equity front and center in the plan.

CRTP also supports and appreciates the fact that the CAPTI attempts through various strategies and actions to align existing major funding programs with CAPTI priorities. All too often, ambitious transportation reform plans seem to have little influence on projects and priorities on the ground. It is critical that the CAPTI avoid this fate.

Our specific comments are as follows:

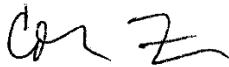
- We strongly support Key Action S2.4 to increase funding to the Active Transportation Program (ATP). In our region, as well as statewide, the demand for active transportation funding far exceeds the supply. We further call for either reform of the ATP or creation of an additional program to distribute non-competitive formula funding dedicated exclusively to active transportation, to reduce reliance on uncertain and unpredictable competitive grant funding.
- Key Action S2.5 calls for convening a discussion among "local and regional rural transportation partners" to discuss specifically how to improve sustainable transportation in rural areas. As a

transportation stakeholder from a largely rural region, CRTP supports this action and asks to be represented in any such future discussion.

- Key Action S6.1 calls for developing a VMT mitigation bank. CRTP strongly **opposes** this idea and its inclusion in the CAPTI. VMT is not a fungible commodity which can be traded by means of a “bank.” Reducing VMT requires comprehensive design for active transportation and transit at the local level. A single auto-oriented project can render useless a multitude of investments in other modes in a given community, and quantification of these impacts is often difficult and subject to many unverifiable assumptions. A VMT mitigation bank would allow agencies to avoid the hard but necessary work of reshaping our transportation infrastructure and instead continue to build vehicular capacity increasing projects which further increase VMT.
- Key Action S6.3 calls for developing a framework to prioritize projects in Regional Transportation Plans (RTP) that actually promote state climate objectives, rather than assuming that any project in an adopted RTP is consistent with local and state goals. CRTP strongly supports this measure.
- Key Action S7.1 suggests that the state may start adding criteria to transportation funding programs that prioritize applicant agencies with density/infill incentive programs. CRTP strongly supports this measure. We suggest that the language describing this measure in the CAPTI be changed from “could” to “will” to indicate a commitment to actually implementing this important measure.

Thank you for your consideration of our comments.

Sincerely,



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