



December 13, 2024

Darwin Moosavi, Deputy Secretary  
 Environmental Policy and Housing Coordination  
 California State Transportation Agency  
 Via email: [CAPTI@calsta.ca.gov](mailto:CAPTI@calsta.ca.gov)

**Comments on CAPTI Update**

Dear Deputy Secretary Moosavi,

Thank you for the opportunity to provide comments on the updates to the Climate Action Plan for Transportation Infrastructure (CAPTI). We view this strategy as vital to aligning the state’s transportation investments with reductions in harmful emissions that threaten health at the local, regional and global scale. CAPTI provides hope that the state will move toward building a safe, healthy and equitable transportation system that works for all Californians.

Today, Californians continue to face the most difficult air pollution challenges in the United States. The transportation sector is the dominant source of California’s longstanding, worst-in-the-nation ozone pollution and associated health emergencies. Transportation is also a major contributor to carcinogenic particle pollution (including from engine emissions as well as brake and tire wear), and the largest source of carbon emissions that drive climate change health risk. The health effects of transportation are well documented by decades of peer-reviewed research, including hundreds of studies that identified premature death, asthma onset and other harms associated with traffic pollution exposures.

To address these public health impacts, and to recognize the ongoing divergence between California’s need to achieve clean air and climate standards and policy decisions that support increased vehicle miles traveled (VMT), CAPTI must focus on limiting access to public funds for transportation projects that move us further off track to emission reductions. While the state transitions to cleaner and zero-emission vehicles, buses and trucks, we must recognize that the combustion of fossil fuels will remain a major part of the on-road landscape in California for decades, necessitating the significant need for immediate and lasting VMT reductions.

Thank you for considering our comments below related to reconsideration of legacy projects, broadening CAPTI scope and maintaining focus on reducing public health harms of transportation investments:

**Review and Update Legacy Projects:** CAPTI and associated guidelines must support the review and revision of previously proposed projects that do not align with the intended outcomes of the CAPTI framework. While severe misalignment may be reason for disqualification, it is more likely that this review could result in identification of shortcomings and help to improve project outcomes and alignment with state needs. To achieve greater transparency, we support the proposal to create an online database of projects under development and recommend that all projects proposed for public funds be included in the database for analysis against emission reduction and other requirements.

**Focus on both passenger vehicle and freight impacts within the Transportation Corridor Enhancement Program (TCEP)** - CAPTI must clearly incorporate the need for reduction in passenger VMT to address air pollution within TCEP programming. In addition to freight considerations and needed investment in zero-emission transportation infrastructure, we support the planned strategy that acknowledges that competitive proposals through TCEP must also focus on reducing passenger vehicle miles traveled (and associated brake and tire wear, engine emissions and other impacts of passenger vehicles).

**Project-specific approach to Solutions for Congested Corridors mitigation** – CAPTI should specify that project-specific vehicle miles traveled should be mitigated, rather than portfolio-wide mitigation banking. A portfolio approach could clearly result in projects that increase VMT, local diesel exposure and other negative outcomes, while project-specific mitigation – or avoidance of harms altogether – represents a better outcome for public investment.

**Expanded health focus within future CAPTI analyses** – we encourage the next iteration of evaluation metrics to include additional resolution in terms of emission reductions (NO<sub>x</sub>, fine particles in addition to greenhouse gases) and consideration of inclusion of health outcomes.

In closing, we appreciate your commitment to ongoing public discussion of progress made - and still needed - on the CAPTI framework. Implementing these strategies will take California one step closer to meeting required emission reductions and preventing negative health and equity outcomes from California's transportation system. Please reach out to William Barrett with the American Lung Association at [William.Barrett@Lung.org](mailto:William.Barrett@Lung.org) for additional information.

Thank you,

American College of Physicians California Services Chapter  
American Lung Association  
Asthma Coalition of Los Angeles County  
Breathe Southern California  
BUDDIGA Family Allergy Asthma Skin Immunology  
California Nurses for Environmental Health and Justice  
Climate Health Now  
LifeLong Medical Care  
National Association of Pediatric Nurse Practitioners San Francisco Bay Area Chapter  
Public Health Institute  
Regional Asthma Management & Prevention  
San Francisco Bay Area National Association of Hispanic Nurses  
San Francisco Bay Physicians for Social Responsibility