



December 8, 2023

Secretary Toks Omishakin
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814
Via email

RE: 2023 Climate Action Plan for Transportation Infrastructure (CAPTI) Progress Report

Dear Secretary Omishakin,

Thank you for the opportunity to comment on the draft 2023 progress report on the Climate Action Plan for Transportation Infrastructure (CAPTI). We appreciate CalSTA's commitment to developing and implementing the CAPTI framework and recognize that progress is being made on the metrics included in the document.

Despite decades of clean air progress, 98 percent of California's population still lives in a community impacted by unhealthy levels of ozone ("smog") and/or fine particle ("soot") pollution and associated health risks.¹ Children, seniors and people living with lung and heart illnesses are at greater risk to the harms of unhealthy air. Significant disparities also exist in terms of local pollution burdens on lower-income communities and communities of color impacted by land use decisions that place major pollution sources – often transportation-related – in vulnerable communities. Climate change is amplifying these health risks and disparities and accelerating conditions for unhealthy air among a suite of public health risks challenging Californians. The majority of ozone- and particle-forming oxides of nitrogen (NOx) emissions in our state come from transportation sources, which are also responsible for the greatest share of climate pollution in the state.

While the first iteration of the CAPTI was limited to alignment of approximately \$5 billion in discretionary transportation funds, a much more comprehensive approach to transportation is needed if California is to achieve clean air and climate standards. Because of this, we welcome CalSTA's plan to review CAPTI for updates next Spring. The public health, environmental justice and climate consequences of the transportation sector demand a broader application and heightened urgency of the alignment envisioned in Executive Order N-19-19. As CalSTA moves to the 2024 review of CAPTI, we encourage the following areas of focus:

Apply the CAPTI framework to beyond the discretionary funds included in the initial CAPTI program. The CAPTI progress report notes that even within programs included in the framework, funding remains available to projects that will increase vehicle miles traveled and associated pollution impacts. Beyond those initial funding programs, the laudable vision of the CAPTI framework does not apply. This means that far more investments are made without even a screening for alignment with California's vision for health, equity and sustainability than are reviewed through the framework. CAPTI should be applied more broadly across a wider range of public funding programs with clear tracking in terms of VMT,

¹ American Lung Association. State of the Air 2023. April 2023. www.lung.org/sota

greenhouse gases, smog-forming emissions, fine particles and other health-harms should be incorporated beyond the metrics included in the current review.

We note the recent California Air Resources Board (CARB) report documenting the ongoing challenges in implementing California's Sustainable Communities and Climate Protection Act (SB 375, Steinberg, 2008), which stands in contrast to the progress noted in CalSTA's draft CAPTI report, though each report highlights the need for better alignment of state funds with meeting climate standards. The Administration must act much more quickly to shift public funding away from pollution-spiking investments toward those that support attainment of federal clean air standards and meeting daunting vehicle miles traveled targets needed to attain California climate standards:

"Specifically, federal, State, and local transportation funding sources need better alignment with State objectives around climate and equity, and both new and existing funding sources should be designed in ways that are sensitive to community needs and flexible to change. Key opportunities to respond to these challenges include reimagining roadway projects that increase VMT, improving access to funding for multimodal projects, and prioritizing community needs."²

Recognize more stringent clean air and climate standards in CAPTI review. Since the initial CAPTI was developed, California has included more ambitious VMT reduction requirements to achieve climate standards, and federal standards for health-protective limits on pollution have been proposed. California must review and update its approach to reducing harmful emissions holistically and can no longer afford investments that push the state "in the wrong direction, away from advancing climate goals and showing worsening inequality."³ California's guiding documents for attaining health-protective clean air and climate standards are clear about the urgency of reducing emissions from the light-, medium- and heavy-duty vehicle sector both in terms of zero-emission technologies but also VMT reduction strategies.

- The State Implementation Plan for Ozone illustrates that increasing mobile source emissions represent a threat to achieving clean air standards and that reducing VMT is "necessary to directly and immediately reduce mobile source NOx and ROG emissions..." and "necessary to achieve federal air quality standards."⁴
- California's Climate Change Scoping Plan notes that "California is not on track to meet its associated climate goals under SB 375"⁵ and set major reductions in VMT into the plan to meet 2030 statutory standards and longer-term carbon neutrality.

State and local agencies must coordinate to ensure greater focus on sustainable land use and transportation planning that prioritizes health, equity and sustainability over capacity expansion and other pollution-inducing investments and project approvals is crucial to healthier communities.

² CARB. 2022 Progress Report on California's Sustainable Communities and Climate Protection Act (SB 150 Report) at p. ES vi. June 2023. <https://ww2.arb.ca.gov/sites/default/files/2023-05/2022-SB150-MainReport-FINAL-ADA.pdf>

³ CARB. 2022 Progress Report on California's Sustainable Communities and Climate Protection Act (SB 150 Report) at p. ES iii.

⁴ CARB 2022 State Strategy for the State Implementation Plan at pp. 72-3. September 2022.

https://ww2.arb.ca.gov/sites/default/files/2022-08/2022_State_SIP_Strategy.pdf

⁵ CARB. Climate Change Scoping Plan. Appendix E at page 4. November 2022. <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-e-sustainableand-equitable-communities.pdf>

In closing, we appreciate that CalSTA continues to report on progress in the draft CAPTI report and it is poised for a 2024 review of CAPTI. We look forward to the ongoing dialogue on shifting focus to a healthier, more equitable and more sustainable transportation system in California. Please contact me with any questions and thank you for considering our perspective.

Sincerely,

A handwritten signature in blue ink that reads "Will Barrett". The signature is fluid and cursive, with the first name "Will" and last name "Barrett" clearly distinguishable.

Will Barrett
National Senior Director
Clean Air Advocacy

COALITION FOR



SPUR



CALBIKE
CALIFORNIA BICYCLE COALITION



December 8, 2023

Secretary Toks Omishakin
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

RE: Public Comments on the Draft Climate Action Plan for Transportation Infrastructure (CAPTI) 2023 Annual Progress Report

Dear Secretary Toks Omishakin,

Thank you for this opportunity to respond to the 2023 Progress Report for the Climate Action Plan for Transportation Infrastructure. We are excited to see the tangible results from the implementation of CAPTI actions and that CalSTA is committed to updating CAPTI as more actions are marked as completed. However, we are concerned by the claim that all CAPTI actions will be completed by June of next year. While we wish we could share the report's optimism, greenhouse gas emissions and vehicle miles traveled have continued to steadily climb in almost all California's regions. More work needs to be done to reign in harmful emissions before we are able to fully celebrate our successes.

The Impact of CAPTI on State Transportation Investments

We greatly appreciate the inclusion of calculations that show the impact of CAPTI on SB 1 funding programs. Having this information available to the public in an easy-to-understand manner helps improve transparency and showcases the great progress our state has made on CAPTI Implementation. We hope this information will continue to be included and updated in future versions of the Progress Report and are looking forward to the published results of the Mineta Transportation Institute Study.

The state has made good progress, but we are still far away from achieving our goal of decreasing GHG emissions by 40% in the next seven years. While this section highlights the impact CAPTI's enactment and implementation have had on the types of transportation projects that have been funded and built by the state, it also showcases that we are nowhere close to fully tackling the problem. For example, Figure 3 shows VMT rating declining from pre-CAPTI to post-CAPTI adoption. However, despite the decline, the figure still shows that we continue to have a net increase in VMT even after most of CAPTI has been implemented. Similarly, Figure 4 shows the impacts in VMT rating across four different SB 1 programs, with three of the four programs being shown to continue to increase VMT or be VMT-neutral despite the progress on CAPTI.

State funding programs are still funding projects that increase driving and therefore increase emissions, showing a misalignment between the state's policy goals and investments. Additionally, Table 1 showcases the changes in VMT rating for the ATP, SHOPP, and TIRCP programs in the time period before and after CAPTI. While the progress report demonstrates these three programs as examples of programs that maintained their VMT-reducing nature, the table shows the TIRCP reducing its VMT rating by 0.31 and the SHOPP reducing its rating by 1.52, while the ATP program is shown to have actually increased VMT after CAPTI adoption, with a VMT rating change by 35.89. Though we understand that the ATP numbers could be attributed to limitations in methodology, we are still concerned that the other two programs showed a very minor difference in VMT reduction. Given the severity of climate change and the need to encourage a shift to non-auto modes of travel, we hope to see a stronger improvement in VMT reduction in future CAPTI Progress reports.

Finally, although we appreciate the SB 1 programs updating their guidelines to be in alignment with CAPTI, we think it's too early to celebrate their successes until all projects move us closer in some way to achieving CAPTI principles. For example, the progress report highlights that 40% of TCEP projects include active transportation improvements and that 68% of ITIP funding goes to rail and active transportation projects. However, this simply highlights that 60% of TCEP and 32% of ITIP funding is continuing to be invested in highway widenings and undoing all of the progress on CAPTI. **We ask that CalSTA continue working with CTC and Caltrans to strengthen future SB 1 guidelines and ensure that the projects being selected for funding are as consistent with CAPTI principles as possible.** In particular, we hope that the Caltrans System Investment Strategy (CSIS) is finalized and adopted as soon as possible so that it can guide SB 1 cycle 4 projects to ensure that all of them promote CAPTI principles in some manner.

Implementation Strategies and Action Matrix

We appreciate this section showcasing the status of each CAPTI action in a way that is easy to track and understand. We also appreciate the detailed explanation of what was accomplished in each action. However, while we understand that an action is marked as complete if it simply accomplishes what was listed in CAPTI, we still consider that a few actions were marked as complete prematurely and ask that this is addressed.

S2.4 - Increase Funding to Active Transportation Program (ATP)

This action directs CalSTA to increase funding for the Active Transportation Program, which has been historically oversubscribed and encourages mode shift to bicycling and walking through improvements to active transportation infrastructure. The CAPTI Progress Report marks this action as complete due to the program receiving a \$1.05 billion increase in state funds for Cycle 6 projects. However, the report acknowledges that this is a one-time funding source and it is currently unclear if the program will continue to receive these funds going forward. Given that the California budget has been facing deficits in the last couple of years, we believe that the ATP should be cautious on relying on an influx from general funds in future years. Making sure the ATP is fully funded is important to the long-term success of the program as last year the CTC announced that the additional billion in funding allowed the program to triple the amount of projects they were able to fund that cycle. Thus, we ask that CalSTA work on securing additional long-term funding sources to ensure that the ATP is sufficiently funded for years to come before marking this action as complete.

S4.1 - Develop and implement the Caltrans System Investment Strategy (CSIS) to Align Caltrans Project Nominations in with the CAPTI Investment Framework

This strategy directs Caltrans to develop the Caltrans System Investment Strategy to develop a rubric that selects projects in alignment with CAPTI during the project selection process. We have been closely engaged and strongly support this process as this will ensure that the projects funded by our state move us towards a clean and sustainable transportation system with a focus on public transit and active transportation modes. However, we are concerned that the CAPTI Progress Report marks this action as complete by June 2024. While we understand that the process of developing and finalizing these documents can be time-consuming, we also want to ensure that CSIS will be ready to be used when selecting projects for funding for cycle 4 of the SB 1 program. Given the urgency surrounding the need to reduce GHG emissions and VMT, and the long-term timeline of transportation projects, selecting for better projects needs to happen as soon as possible to ensure we are actively moving CAPTI principles forward. For this reason, we ask that the CSIS adoption be expedited to ensure that the rubric can be used in the project selection process as soon as possible.

S6.1 - Explore New Mechanisms to Mitigate Increases in Vehicle Miles Traveled (VMT) from Transportation Projects

This strategy directs Caltrans to brainstorm alternative ideas for how to encourage VMT mitigation in transportation projects. The CAPTI progress report currently marks this item as complete as Caltrans has considered a VMT Mitigation Bank and has developed an Advance Mitigation Program as possible alternative solutions.

However, we do not believe that these two options are adequate in encouraging VMT mitigation. The VMT Mitigation Bank proposal is flawed as it depends on how the bank calculates the cost of VMT. If the VMT cost is set too low, the mitigation bank could simply be a way for project developers to pay a small fee and still build projects that increase VMT. On the other hand, setting VMT costs too high would discourage project developers from doing any VMT mitigation. At the moment, there is no way to determine whether VMT costs are adequate without trial and error, and an unbalanced mitigation bank system could do more harm than good and increase GHG and air pollution emissions from our transportation system.

Similarly, the Advance Mitigation Program may not be strong enough to encourage the mitigation of VMT. For example, the program currently defines mitigation as also allowing for compensating for the impact by providing substitute resources or environments. Although the guidelines discourage compensatory mitigation, the program would still allow developers to simply pay a fee instead of doing any actual mitigation. Thus, this language could lead to projects receiving credits for doing environmental harm if they are able to provide adequate compensation.

Both of these VMT mitigation strategies currently provide loopholes to allow developers to avoid doing any actual mitigation if they are able to pay a certain amount determined by the program administrators. This option severely undermines the ability of these programs to properly mitigate VMT impacts from transportation projects. We ask that this action either considers amending both ideas to ensure that developers cannot simply pay their way out of VMT mitigation, or determines alternative mechanisms that require every developer of a project that is set to induce VMT to also include robust VMT-reducing strategies as part of their project scope.

Conclusion & Next Steps

We are thankful that CalSTA is considering updating CAPTI and is seeking feedback on what should be included in the next update. We echo the Progress Report's suggestion that the next iteration of CAPTI should focus on the future of the State Highway System. California's transportation agencies have long focused on improving and expanding our highway system in the name of congestion reduction and economic development. However, highway widenings actually do the opposite and increase the amount of traffic on the road, further contributing to increased GHG emissions and poor air quality. We believe that it is time to reimagine how we invest in and develop our highway system. We ask that the next CAPTI update strongly considers whether our current state highway investments actually promote the principles of

CAPTI and to suggest actions that move us closer to the goal of a sustainable transportation system.

Additionally, we support the next update of CAPTI looking at how to better fund and streamline public transit and active transportation projects and how to update state funding programs to support frequent, high-quality transit in light of a changing business environment. As demonstrated this budget cycle, public transit agencies are currently facing a fiscal cliff. At the same time, the legislature is hesitant to fund those agencies due to transit ridership slowly declining from COVID impacts and more people choosing to drive. However, this lack of investments creates a negative feedback loop where transit agencies struggle to get new riders due to a lack of investment in transit operations, safety, reliability, and affordability. We welcome CAPTI to develop some actions and strategies to combat this “death spiral” and ensure that Californians have access to alternative modes of transportation as we work to reduce vehicle miles traveled.

Thank you again for all of the great work that has been done to implement CAPTI. This type of work is crucial to guaranteeing that California faces a bright future ahead when it comes to our transportation infrastructure. We hope you will consider the recommendations in this letter to ensure that CAPTI actions are fully complete and that we are striving for the best results in reforming the SB 1 programs. We hope to continue to stay engaged as CalSTA develops the next iteration of CAPTI and tackles the next set of transportation challenges facing our state. Please reach out to us if you have any questions about the contents of this letter.

Sincerely,

Sofia Rafikova
Policy Advocate
Coalition for Clean Air

Laura Tolkoff
Interim Chief of Policy & Transportation Policy Director
San Francisco Bay Area Planning and Urban Research Association (SPUR)

Matthew Baker
Policy Director
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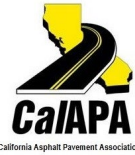
Jared Sanchez
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November 28, 2023

The Honorable Toks Omishakin
Secretary
California State Transportation Agency
400 Capitol Mall, Suite 2340
Sacramento, CA 95814

Re: Statewide Transportation Construction Industry Comments on Climate Action Plan for Transportation Infrastructure Draft 2023 Annual Progress Report

Dear Secretary Omishakin,

On behalf of Transportation California and our undersigned member organizations, representing the statewide transportation construction industry and workforce that builds, repairs, and maintains California’s multimodal transportation system, we write to commend the Newsom Administration, California State Transportation Agency (CalSTA), California Department of Transportation (Caltrans), California Transportation Commission (CTC), and the state’s regional and local transportation partners for making incredible strides to address climate change from the transportation sector. As detailed in the Climate Action Plan for Transportation Infrastructure (CAPTI) Draft 2023 Annual Progress Report (Draft Report), California is ahead of schedule in implementing actions and strategies to align transportation funding with its ambitious and critical climate goals.

The state’s approach, as reflected in CAPTI, is making measurable progress to reduce transportation related greenhouse gas (GHG) emissions and related air quality and equity impacts. This is no small feat considering that the transportation-climate change dilemma is rooted in over eighty years of post war suburbanization and land use decision-making. Overcoming land use related challenges will take time

and solutions will inevitably vary depending on the region and individual community. As CalSTA prepares to update CAPTI in 2024, we have the following recommendations:

1. Retain the flexible framework in the existing CAPTI that recognizes regional differences and that allows investments in *all* types of transportation solutions, including state highways, rail and transit, and bicycle and pedestrian infrastructure;
2. Monitor construction jobs and economic indicators and collect and make publicly available robust data on transportation investments to prevent, and mitigate to the greatest extent possible, unintended consequences from policy and funding decisions;
3. Evaluate how the state can transform its mass transit systems and plans so that Californians have accessible, safe, affordable, and reliable alternatives to the personal vehicle;
4. Invest in housing supportive infrastructure to support infill housing development and take action to create better jobs-housing balance and fit so that Californians can live closer to living-wage jobs; and
5. Fund, on an ongoing basis, programs that harden and make more resilient our existing and future transportation infrastructure vis-a-vis climate change.

The transportation industry has been active in CAPTI development and implementation – striving to support the state in meeting its laudable climate change, health, and equity goals, while also creating and sustaining living-wage jobs, spurring economic growth, and providing opportunity for upward mobility for all Californians. The Draft Report provides valuable information and data demonstrating that the state is making climate progress without negative impacts to the economy and jobs. Moreover, while CAPTI does not emphasize investments in new highway capacity above other modes, it includes a flexible framework that allows capacity investments when necessary to solve complex transportation problems. Given this nuanced approach to transportation investments, we are especially gratified by the following findings:

- An economic analysis of state transportation investments under CAPTI found that job creation and job quality was maintained in the post-CAPTI adoption phase.
- The amount of funding going to projects that increase vehicle miles traveled (VMT) has significantly decreased since 2019.
- There has been a reduction of GHG emissions across the state’s portfolio of transportation programs since the adoption of CAPTI, as compared to the pre-CAPTI investments.
- A new VMT rating system created by the Mineta Transportation Institute suggests that the state’s transportation investments decreased VMT generated from transportation programs (from 6.9 in the pre-CAPTI period to 1.16 in the post-CAPTI adoption phase).
- There have been improvements to transportation equity outcomes among disadvantaged communities resulting from CAPTI implementation.

These achievements are in addition to implementation of a plethora of other programs to address transportation related climate and equity impacts such as the Reconnecting Communities Highways to Boulevards Pilot Program, Carbon Reduction Program, and the Port and Freight Infrastructure Program. Collectively these investments will help reconnect communities that have experienced harm due to past transportation and land use decision-making, reduce GHG emissions from the movement of goods while also increasing safety and efficiency, and accelerate deployment of zero-emission vehicles and manage

the existing transportation network to achieve greater efficiency, reduce GHG emissions, decrease congestion, and save Californians valuable time.

Thank you for the opportunity to provide our perspectives on the Draft Report. We commend the Administration, CalSTA, and its partners for their successes to-date. We look forward to working with the Administration to update CAPTI to ensure state investments continue to support living-wage jobs, economic opportunity, the safe and efficient movement of goods and people, and climate progress.

Sincerely,

/s/

Kiana Valentine
Transportation California

Peter Tateishi
Associated General Contractors of California

Matt Cremins
International Union of Operating Engineers

Brad Diede
American Council of Engineering Companies,
California

Ron Rowlett
Nor Cal Carpenters Union

Robert Dugan
California Construction and Industrial Materials
Association

James Thuerwachter
California State Council of Laborers

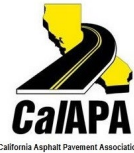
Russell Snyder
California Asphalt Pavement Association

Jon Switalski
Rebuild SoCal Partnership

Matthew Conarro
Western Regional Association for Pavement
Preservation

Emily Cohen
United Contractors

John Gasparo
Southern California Contractors Association





**CALIFORNIA
ALLIANCE
FOR JOBS**

November 28, 2023

SUBMITTED ELECTRONICALLY

Secretary Toks Omishakin
California Transportation Agency
400 Capitol Mall, Suite 2340
Sacramento, CA 95814

Re: Comments on the 2023 CAPTI Progress Report

To Secretary Omishakin:

The California Alliance for Jobs (Alliance) appreciates the opportunity to comment on the Climate Action Plan for Transportation Infrastructure (CAPTI) 2023 annual progress report.

The Alliance represents over 2,000 heavy construction companies and 80,000 union construction workers from Bakersfield to the Oregon border. The Alliance is a unique labor-management partnership that advocates for responsible investments in public infrastructure projects. Specifically, the Alliance keeps California’s people and economy moving as the state’s population grows by focusing on improving water systems, expanding transportation networks, and increasing the access and quality of our public infrastructure. Ultimately, smart infrastructure investments are the backbone of California’s long-term success; ensuring future generations have sustainable economic prosperity and an enhanced quality of life. The Alliance is proud to support our members’ mission to build and maintain California’s most vital infrastructure.

Upon reviewing the CAPTI 2023 progress report, below are several comments that we are submitting for the public record.

1. Acknowledging the green transition. First, the construction industry does in fact understand the need and efforts toward the state’s green transition. Climate change is one of the most vital issues we are currently facing. We ask that our State agency partners actively work and engage with stakeholders, including the construction industry, to develop policies and guidelines that are both practical and will allow the State to realistically reach its climate objectives.
2. Preserve the intent and integrity of existing transportation funding programs. As previously mentioned, the need to address the State’s climate challenges is great. However, with that in mind, CAPTI should also aim to preserve the intent and integrity of existing transportation funding programs. For example, with respects to the Local Partnership Program (LPP), regional transportation agencies have worked diligently to pass local sales tax measures with a

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supermajority vote (over 66%) and are dedicated to funding transportation projects and programs that reflect their regional transportation needs. It goes without saying that these local measures are the key to unlocking additional state and federal dollars that are vital to regional transportation agencies meeting not only their transportation, but also environmental and economic development needs. As a result, to preserve voter confidence and ensure that the promises made to voters in approved expenditure plans are the promises kept, we strongly urge that the policies and program guidelines that stem from CAPTI do not require regional transportation agencies to deviate from their voter-approved expenditure plans when applying for state transportation funds.

Additionally, the Trade Corridor Enhancement Program (TCEP) is designed to improve the efficiency of transporting goods to and from ports of entry to logistics centers, to then ship across the country. The draft CAPTI report notes that over 40% of TCEP projects in the latest funding cycle included active transportation improvements within freight improvement projects, while simultaneously reporting that the Active Transportation Program (ATP) received a significant infusion of funds resulting in doubling the number of projects it funded for the most recent cycle. It's unclear why TCEP funding is being used for active transportation projects when California is home to two of the world's busiest ports and ATP is currently receiving significant amounts of program funding. Thus, when updating CAPTI in 2024, we ask State leaders preserve the intent and integrity of existing transportation funding programs and ensure taxpayer dollars are being effectively used to improve their quality of life, public safety, and economic outlook.

3. Maintaining California's transportation infrastructure. As mentioned, the draft CAPTI report notes that several transportation funding programs have incorporated active transportation projects into their programmatic criteria. Moving forward, we ask that State leaders evaluate whether this approach is the most effective use of limited / scarce taxpayer dollars as current state statutes and regulations are aggressively transitioning gas-powered vehicles to zero-emission. As medium and heavy duty zero-emission vehicles are well known to be heavier than their gas-powered counterparts, this will translate into greater deterioration of the roads and bridges. Being that State policy is incentivizing Californians and businesses to transition to zero-emission vehicles and not actually reducing the number of vehicles on our roads, its imperative that infrastructure needs are met to ensure the public safety for all those on California's transportation network.
4. Continued Success. The draft CAPTI reports that all recommendations will be completed by summer 2024 ahead of the schedule envisioned upon its original release in 2021. Since CAPTI's release, the annual updates have demonstrated

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exceptional progress in meeting CAPTI's goals over the past two years. Now is not the time to let the perfect be the enemy of the good. In preparation for the 2024 CAPTI revisions, it would be prudent to avoid recommending more aggressive efforts and rather stay the course to acquire sufficient data on the ongoing progress to accurately assess the necessary / effective modifications to CAPTI while minimizing negative economic impacts.

Ultimately, we understand the need to align transportation goals with the State's climate goals. However, we cannot ignore the real gap between affordable housing availability and the location of job centers throughout the state. Until the State enacts policies that remedy this disconnect, a multimodal funding approach that includes funding for roads and bridges is without question as motorists will continue to commute and goods will continue to be transported in zero-emission vehicles. Thus, we stand here ready to actively engage and provide practical feedback to both CalSTA and Caltrans regarding any and all the policies and / or guidelines derived from CAPTI.

Sincerely,

Michael Quigley
Executive Director
California Alliance for Jobs

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From: [Shahriar Afshar, Evregy LLC](#)
To: CAPTI@CalSta
Subject: Public Comments
Date: Thursday, November 2, 2023 5:49:11 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear CALSTA

Thank you for accepting comments on your draft report. I would respectfully suggest that you consider adding the following ACTIONS to your Appendix A:

1. Provide bridge financing, tax credits & other financial incentives to private sector landlords to make their properties available for EV charging station & eMobility Hubs.
2. Encourage & explore regional transportation agencies (ie SANDAG or BAAOG) to work with, design and support eMobility Hub projects with private enterprises.
3. Audit 'EV Code Friendly' cities & counties as tracked by GoBiz to ensure they are expediting, streamlining & facilitating the permitting of EV charging stations AND eMobility Hubs.

If interested, I am happy to further explain or discuss these comments at your convenience.

Thank you!
Shahriar Afshar

<https://calsta.ca.gov/press-releases/2023-11-02-ca-implementing-solutions-climate-friendly-trans-funding>
