



The California Asphalt Pavement Association

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Mr. David S. Kim, Secretary
California State Transportation Agency (CalSTA)
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

Re: Climate Action Plan for Transportation Infrastructure – March 2021 Draft

Dear Secretary Kim:

The California Asphalt Pavement Association, founded in 1953, is the oldest and largest construction trade association that focuses exclusively on the asphalt pavement industry in California. Our members include asphalt producers, refiners, paving contractors, testing labs, consultants, equipment manufacturers and many other related companies that make up the multibillion-dollar industry. What follows are our comments on the recently released draft of the “Climate Action Plan for Transportation Infrastructure” (CAPTI).

First off, we would like to commend the Interagency Working Group for their work in pulling together this comprehensive document, which attempts to connect the dots between many different rules, laws, regulations, policies, programs and investments and view them through the lens of integration, coordination and accentuating key environmental, community and equity goals.

There is a lot to like in this report. Any effort to better connect transportation and land-use planning and investments is worthy of our praise. In addition, elevating the voices of our disadvantaged communities is welcome. Taking our state’s proud history of environmental action and diversity to the next level in the transportation realm is laudable.

We also are encouraged by the recognition that the state needs to get moving on putting in place an EV infrastructure. Highlighting the need to focus on resiliency of our transportation assets is also gratifying. Curiously, omitted from the report are the great strides SB1 has made in reducing GHG by fixing roads and smoothing pavements, which have been shown to result in great improvements in fuel economy and reducing emissions.

Having noted the above, however, there is scant attention paid in the CAPTI report to the important connection between infrastructure investments and jobs and the economy. There are also assumptions about land-use and transit use that do not seem connected to a post-COVID reality. We are concerned with the various components of the report that promote VMT reduction for VMT reduction’s sake, but little connection to if it is consistent with the reality of how people, goods and services move around our communities and our state now and in the future.

Furthermore, various references in the CAPTI report to altering project ranking systems is cause for grave concern to our industry. It could arbitrarily result in eliminating highway projects desperately needed to improve mobility and the quality of life for so many communities in California.

We are also greatly disappointed that this plan was developed behind closed doors, by bureaucrats, with little input from stakeholders such as our industry, who will be impacted mightily by this plan should it move forward in its present form. We also view this plan as an exercise that is largely redundant of other plans out there, including the ATP, CEQA, ITIP, SCPP, TCEP, ASHC, CSIS, SHSMP, CTP, CCAP, just to name a few. This is not to mention the connection to many laws that have been passed by the Legislature over the years, such as AB617, AB2588, SB375, etc.

In addition, this document does not place enough emphasis on massive shifts underway now that undermine some of the conventional wisdom of the environmental community, namely to cram people tightly into cities so they abandon their cars for walking, biking and transit. Meanwhile, there is a big exodus from San Francisco and other urban areas to suburbs that are car-dependent. Teleworking has further severed the connection between where you work and where you live. Rather than demonize individual vehicles, we should plan for a future where ZEVs, packed with technology, drive us around, virtually eliminating pollution, traffic congestion and vehicle accidents – the biggest negatives currently attributable to automobiles. We should not fear VMT but rather plan for it and invest in accommodating it.

The “leveraging” of \$5 billion in transportation funding that was so controversial in the Governor’s Executive Order in 2019 (N-19-19) is basically summarized on Page 13. It should be noted that of all the funding buckets, the SHOPP is the biggest one in the crosshairs: \$4.2 billion. All the other funding sources combined amount to \$1.42 billion. As an overarching policy goal, the ITIP and LPP should be boosted to support local communities deciding for themselves what is the best way to move people, goods and services around their regions (but not at the expense of the SHOPP).

Beyond our overall comments as stated above, what follows are some specific areas of concern referenced by page number that we felt merited additional commentary:

- (Page 14) “Reducing our dependence on driving will take better coordination of land-use decisions in addition to the transportation decisions discussed in this document. This requires coordinated investments to further economic development and jobs in housing rich areas, support additional compact development and housing density in low VMT/high opportunity neighborhoods, prioritize disadvantaged communities while implementing protections against displacement, and preserve land at risk of conversion to urbanized uses.” Comment: Coordinate, yes. But this densification argument is not based in current realities as stated earlier in this letter.

- (Page 17 – Key Action) The CTC will work towards updating the SCCP guidelines and scoring criteria “to better prioritize projects that provide travelers with options to opt out of congestion.” Comment: The millions of our fellow Californians who voted to protect transportation dollars at the ballot box will no doubt be angered to see this major policy shift that will no doubt result in MORE congestion and degrading quality of life for residents and businesses that rely on our transportation system to move goods and services efficiently.
- (Page 18) “To be competitive for SCCP funds, applicant projects and their respective corridor plans must demonstrate synchronization with the CAPTI framework.” Comment: This is just another layer of bureaucracy that will add no value to the process of getting transportation improvements from “idea” to completed improvement.
- (Page 18) TCEP Guidelines update to include “a description of eligible uses of funds for zero emission vehicle infrastructure to provide additional guidance and clarity to applicants.” Comment: Our reading of this section leaves us with the distinct impression that this is yet another way to siphon road money for other purposes.
- (Page 21): “Elevate voices.” “Lift up voices.” Comment: What does this mean? Do we really need another committee? There are already numerous ways for voices to be heard in the transportation arena.
- (Page 22) “Develop and Utilize Equity Index.” Comment: This is so amorphous that it could literally turn into anything. We strongly suggest that the intent of this section be more clearly spelled out.
- (Page 23) Update the 2023 SHSMP to align it with CAPTI. Comment: This sounds like another bureaucratic exercise that will not add one iota of value anywhere along the line.
- (Page 23) “Refocus Caltrans corridor planning efforts” by “prioritizing sustainable, multimodal investments.” Comment: This is another area that cries out for more detail to clearly spell out the intent.
- (Page 23 S4.5) Comment: We have concerns with regard to this whole section, particularly as it relates to the targeting of VMT, a subject on which we have communicated our concerns to CalSTA previously.
- (Page 24 S5.3) Comment: In our opinion, this land conservation item is fine as long as it can be channeled toward mitigation. In other words, build here, preserve somewhere else.

While the above-stated comments outline some of our major concerns, there are several areas in the report that we deem worthy of praise. They are listed below:

- (Page 8) “Car ownership has become an expensive necessity for many low-income Californians to access jobs, education and other opportunities – a transition to a zero-emission transportation system cannot leave these Californians behind.” Comment: We agree. How about subsidizing EV purchases for low-income persons? This would be a lot more cost-effective than building an expensive, inflexible transit network that will lose money on

day one and require open-ended subsidies to operate. We could use cap-and-trade funds for this purpose.

- (Page 11) “The state must be strategic and thoughtful when expanding the existing system as we cannot afford to invest in projects that ultimately run up our long-term maintenance costs without bringing an outsized benefit to climate, health and equity goals.” Comment: We agree. This is a strong argument against rushing this report through without ample time for comment by stakeholders, as stated earlier in our letter.
- (Page 14) “This Action Plan will work within the established funding programs created under SB1 to bolster the outcomes of the projects funded under these programs and their alignment with California’s climate goals.” Comment: Yes, and this is already happening. A large body of research has established that vehicles traveling on smoother pavements consume less fuel and therefore generate less GHG. Caltrans metrics of pavement smoothness achieved thanks to SB1 are trending in a positive direction. It should be noted that this is also the attribute most noticed by motorists and taxpayers.
- (Page 15 – Guiding Principles) Comment: Yes, there is no “once size fits all” approach. Yes, we should invest more in facilities for pedestrians and bicyclists to make travel for them more pleasant and safe. In fact, our association and other stakeholders have urged the Administration to fully fund the backlog of ATP projects to the tune of \$2 billion with General Fund surpluses. Yes, we should focus these efforts on low-income and disadvantaged communities.
- (Page 16) Comment: Yes, we should invest in our EV charging infrastructure. Yes, we should avoid placing new or exacerbating existing burdens on BIPOC communities.
- (Page 20) Develop a new Clean Fleets and Facilities Network Improvement Project category in the TIRCP. Comment: Yes, more EV infrastructure please. The Biden Administration has already recognized this as a priority.
- (Page 23 S4.4) Facilitating corridor planning across Caltrans District Boundaries. Comment: Hallelujah! This is a longstanding concern of ours that we have expressed in numerous forums over the years.
- (Page 24 S 5.1) Comment: We heartily endorse any efforts to work on infrastructure resiliency. The governor recently toured the rapid reopening of Highway 1 in Monterey County, partly due to asphalt’s ability to repair roads quickly. More efforts should be put in place to harden our infrastructure from Climate Change-induced sea-level rises and other risks.
- (Page 26) Strengthen transportation-land use connection. Comment: This is a nice aspirational goal, but difficult given the Byzantine nature of planning and construction in our state. This should not hinder us from trying to make it better, however.

Finally, there are some areas of the CAPTI report that we would respectfully request additional clarification. They include:

- (Page 16 – guiding principles) “Promoting projects that do not significantly increase passenger vehicle travel.” Comment: Please define “significantly.” Also in this bullet, it says to “consider alternatives to highway capacity expansion.” Consider is fine, as long as these projects are not disadvantaged via project prioritization rating systems.
- (Page 17 – Key Action) “Generate revenue for VMT-reducing projects through employing vehicle demand management strategies.” Comment: We definitely want to know more about this vague reference.
- (Page 27, S7.3) Comment: We would like to know more about the highways to boulevard process. On its face, this could be good, but the devil is always in the details. There have enough “traffic calming” fiascos around the state to inform our thinking in this area.
- (Page 25, S6.1) Comment: We want to know more about this VMT mitigation fund, how the funds are generated, who controls them, and how they will be utilized.
- (Page 25, S6.2). Comment: We want to know more about this mitigation fund as well in similar detail to the bullet above.
- (Page 25, S6.3) We want to know more about this interagency framework for housing and transportation investments. What are the goals? The strategy?

Thank you in advance for your careful consideration of our industry’s perspective on this important matter. We look forward to further engagement with CalSTA on refining and improving this report to make it as relevant to current realities as possible. Please feel free to contact me at (916) 791-5044 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell W. Snyder". The signature is fluid and cursive, with a long horizontal stroke at the end.

RUSSELL W. SNYDER, CAE
Executive Director

CC: Kiana Valentine, Transportation California