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Dear Mr. Corley:

On behalf of the undersigned organizations, we respectfully submit the following comments on the California Transportation Plan 2040. We recognize the multitude of efforts required to develop this long-range plan and appreciate all of the hard work that has already been done. The long-range vision outlined in this Plan is closely aligned with our missions to create healthy, sustainable and equitable communities with a variety of safe, convenient and affordable transportation options to get around. We commend Caltrans for committing to a multimodal, sustainable future with this plan and urge Caltrans and other agencies to utilize this plan in its decisionmaking and implementation efforts.

**First, we strongly support the overarching CTP goals and commend Caltrans for including social equity, multimodal transportation and environmental stewardship as goals.**

**We appreciate the Plan’s focus on more than just mobility.** The State has ambitious climate goals, commitments to equity and safety and increased emphasis on multimodal transportation options. This Plan is a significant step forward in institutionalizing those policies in transportation agency decisionmaking. We support the inclusion of “multimodal” and “for all people” in Goal 1, “Improving Multimodal Mobility and Accessibility for All People,” which indicates a shift to alternative modes and a focus on equity, and the discussion of active transportation and transit in the Plan. We also support Goal 3, “Support a Vibrant Economy,” and its focus on lower transportation costs and providing multimodal choices to boost economic development.

**We are especially supportive of Goal 5, “Foster Livable and Healthy Communities and Promote Social Equity,” and the recommendations contained therein.** The State has many disadvantaged communities that have been historically underinvested in when it comes to infrastructure, and who have borne the disproportionate impact of many roadway expansion and goods movements projects that have deteriorated air quality and other public health outcomes in surrounding communities. It is important that this Plan acknowledges these equity and environmental justice issues and make recommendations for improving quality of life in these communities. We strongly encourage the state to execute this Goal as much as feasible in its decisionmaking. There are many state transportation funding programs that could benefit from using this Goal as a filter when deciding which projects to fund, and also as part of the public participation process, which often leaves disadvantaged communities without a voice in deciding what projects get built in their communities. We also encourage local and regional agencies to align their own equity and environmental justice goals with this statewide Plan.

**We also commend the state for Goal 6, “Practice Environmental Stewardship,” and recommending coordination with other state laws, policies and programs that combat climate change, reduce conversion of habitat and agricultural lands, promote public health and social equity and facilitate greater investments in active transportation and transit.** Specifically, in Goal 6, Policy 3, we are encouraged that the Plan identifies implementation of SB 743 in project development, as removing Level of Service as a metric of environmental impact under CEQA is a significant step in streamlining multimodal transportation projects and the types of land use that will lead to the greatest reductions in vehicle miles traveled and greenhouse gas emissions.

**Overall, we are supportive of the Plan’s goals, policies and guiding principles. However, we provide the following recommendations for improving the Plan.**

**Develop a prioritization process for implementation of the goals and policies.** We recommend Caltrans develop a prioritization process for implementation either between goals/policies or within goals/policies. Most importantly the Plan should elevate Goals 1, 5 and 6 which relate to multimodal transportation options, equity and environmental stewardship, respectively, as these are all aligned with other state laws, policies and programs to promote sustainability and equity.

**Recognize that the Active Transportation Program is not the sole, nor a sufficient, source of funding for walking and bicycling projects statewide.** We appreciate the Plan’s focus on active transportation and multimodal transportation options. However, in many parts of the Plan, the Active Transportation Program (ATP) is mentioned as the sole source of funding for active transportation and the solution for implementing goals related to walking and bicycling is to Grow the ATP (Goal 1, Policy 3). However, as Caltrans is aware, the ATP has been very oversubscribed in the last two cycles, with over \$1 billion requested for approximately \$360 million available in each cycle. Given the state’s fiscal realities with transportation funding, the ATP should not be looked at as the sole source of funding for walking and bicycling. Even an increase in ATP funding would not meet the demand. We recommend that the Plan commit to growing both the ATP and the share of funding in other state programs that support walking and bicycling projects, including STIP, SHOPP, and Cap-and-Trade programs. The state should also strive to implement AB 1358, the state’s complete streets policy, by integrating walking and bicycling projects into roadway projects.

**Focus on more than just high-speed rail in improving transit.** Many mentions of transit focus solely on High-Speed Rail and intercity rail connections to HSR, including Goal 1, Policy 1. Most trips people take by transit are within a region or locality, to jobs, schools, health care, grocery stores and other goods and services. We recommend Caltrans increase the focus in the CTP 2040 on bus routes and local rail, including funding for transit operations and maintenance, which often comes at the expense of capital expansion projects. In addition, the first and last mile walk and bicycle connection to transit are important, and this is a key place to weave active transportation into transit projects.

**Include a more holistic approach to “Fix It First,” including complete streets language and transit operations and maintenance, that helps us preserve and improve the system we currently have.** Almost the entire “fix it first” section in Goal 2 focuses on “asset management” of existing roads, not on investing our operations and maintenance budget more wisely and safely by incorporating safer design standards, adding pedestrian and bicycle elements through a complete streets approach and funding ongoing operations and maintenance of transit systems that are in need of repair. We recommend the Plan focus on a more holistic approach to “Fix It First” that incorporates these ideas, so that we not only preserve the system we have but also improve it for all modes and make it safer.

**The roadway expansion language, while improved from previous drafts, is still counterproductive to reducing congestion and achieving state greenhouse gas emissions reduction goals.** We appreciate that Caltrans has acknowledged that roadway expansion projects often induce demand and increase congestion in the long run. This draft contains improved language that recommends limiting new roadway capacity, and recommending that the state be smarter in how it invests in roadway expansion. Yet many regions are still planning significant roadway expansion to accommodate future growth instead of considering smart, efficient growth and transportation options. This Plan should be a critical document to inform the various regions in the State on how to invest to achieve state goals, and thus the Plan should more explicitly caution against adding new roadway capacity as counterproductive to maintaining our existing system and achieving state climate goals.

**Any pricing of existing facilities should be used to invest in more sustainable transportation options, including active transportation and transit.** Much of the talk about transportation finance is turning to demand pricing, including HOT lanes, to pay for road expansions and maintenance. We recommend that any pricing of existing facilities also be used to invest in transit and active transportation projects, to ensure that all users along the corridor have access. A good example is Los Angeles County, which reinvests revenue from the I-10/I-110 ExpressLanes into sustainable transportation along the corridors.

**Acknowledge the environmental justice impacts that freight and goods movement strategies have on communities adjacent to these corridors.** The freight section does not speak to the impacts on communities living next to freight facilities nor about mitigation that should be undertaken with freight investments. This discussion is only partially addressed under Goal 5 around environmental justice. Environmental justice communities have historically borne the impacts from the goods movement industry, especially in Southern California where port-to-warehouse traffic travels along congested highway corridors through highly-populated low-income communities of

color. The Plan should recommend policies that discourage transportation projects that disproportionately impact communities adjacent to freight corridors and include recommended mitigation measures where the impacts are unavoidable.

**Focus on implementation and tracking after this plan is completed.** We recognize the hard work that went into creating this Plan and see it as transformative. We want to work with you to ensure it does not sit on the shelf and is a useful resource for state, regional and local transportation agencies. Appendix 8's Matrix of Recommendations provides a comprehensive toolbox for implementing the Plan, but will not compel transportation agencies to use this document. We encourage the state to develop an implementation plan that identifies how the Plan will be used, and how it will incorporate its guidance into existing and future transportation plans and funding program decisions.

**We also have some specific recommendations for improving the Plan language. Page references are provided below:**

| Chapter | Page | Section                            | Comment   |
|---------|------|------------------------------------|---|
| 1       | 7    | Other adopted plans and policies   | Include the Caltrans Strategic Management Plan 2015-2020, the Regional Transportation Plan Guidelines adopted by the California Transportation Commission, and the adopted Sustainable Communities Strategies by Metropolitan Planning Organizations.   |
| 1       | 16   | Goals, Recommendations, Next Steps | Revise the bullet on “expand use and safety of bike/ped facilities with the ATP”, to include “ <i>by increasing funding for the ATP</i> ” and acknowledge the need for protected facilities such as separated paths and class IV bikeways, and connectivity throughout neighborhoods to reduce short trips by car.  |
| 1       | 21   | People                             | The paragraph on safety should acknowledge safety issues as a significant barrier to walking and bicycling. This sentence should be edited: “Safety is a concern not only for drivers and passengers but <i>especially</i> for pedestrians and bicyclists, <i>who are at much greater risk of being killed or injured in a traffic crash, particularly in low-income communities of color.</i> ”<br>Pedestrian deaths continue to be on the rise, so the CTP 2040 should include a clear acknowledgement that to increase travel by walking and bicycling safety for vulnerable users must be prioritized over safety for motorists. Also, the CTP 2040 should acknowledge that this cannot be achieved simply through “encouraging safe driving habits”, but more directly through improving design of our streets to slow traffic speeds and separate people walking and bicycling from high speed and high volume traffic. |

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| 1 | 23 | Planet                                     | In addition to the effects climate change will have directly on infrastructure, and sea level rise, include discussion of the effects of climate change on public health such as higher temperatures exacerbating air quality issues, increasing heat-islands in urban areas, heat-related deaths, etc. Most of these will be experienced in low-income communities first and worst, and the transportation sector plays a major role in the reducing the air quality and in creating more concrete surfaces.   |
| 2 | 34 | Statewide System                           | This section should include discussion of improving our highway assets to move people more efficiently, especially through improvements to pedestrian and bicycle access where the state highway system provides local access. This section should also include mention of the Asset Management Plan effort currently underway, which will direct Caltrans to manage the SHS more efficiently to save taxpayer dollars used for maintenance and operation.  |
| 2 | 39 | Sustainable Freight & Ports                | This section should include discussion of the specific impact of freight trucks, freight rail, and ports on the health of local communities, especially the negative impacts to air quality and safety.   |
| 2 | 51 | Active Transportation Connectivity         | This section discusses the need to expand bike and walk facilities statewide to serve local needs, but mentions only the Active Transportation Program as a source of funds to do this. Relative to the state transportation budget, the ATP represents roughly one percent of overall transportation spending and is not adequate to address walk and bike needs statewide. More discussion of other funding sources (i.e. all federal funding programs can fund bicycle facilities, and other state highway sources should also be taking advantage of cost-effective opportunities to make bike/ped improvements) that can be used to build out the bike and walk network. |
| 2 | 52 | Transit                                    | In addition to funding needs for capital projects, transit agencies also need additional operating resources to maintain and improve transit service on existing transit lines.   |
| 2 | 53 | Regional and Local Land Use Considerations | This section should clearly acknowledge the link between transportation projects and land use as drivers of different growth patterns. Highway expansion has been shown to lead to sprawl development, while transit and active transportation investments support density and infill development. The most important issue to note here is that the RTP-SCS plans developed by MPOs set out a vision plan for land use, but  |

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|   |    |  | ultimately local governments control land use which could result in very different greenhouse gas emission portfolio for the region by the plan horizon.   |
| 3 | 67 | CTP Transportation Scenario 3              | Please state whether the assumptions about vehicle and fuel efficiency are consistent with projections by the Air Resources Board, or based on projections designed just to reach the target of 80 percent GHG reduction by 2050. We should not be relying on more than the most ambitious projections of vehicle fuel economy and efficiency from industry and ARB, since the majority (65%) of Scenario 3 GHG reductions come from vehicle/fuel efficiency. If those assumptions are beyond reasonable projections, the other GHG reduction strategies should be more ambitious to meet the targets. |
| 3 | 69 | Role of Land Use (call out box)            | In addition to transit-oriented land use supporting efficient transportation modes and reducing auto-dependency, this box should acknowledge that transportation investments, such as highway expansion, can spur certain types of development, such as sprawl development. In particular, land use impacts between regions may not be included or modeled in RTP-SCSs, but are likely to be impacted by interregional highway investments through the Caltrans Interregional Transportation Improvement Program (ITIP), for example.  |
| 4 | 95 | Goal 1, Policy 3, bullet point 1           | “Support and implement projects and policies, including Complete Streets <i>on all roadway maintenance and capacity projects on roadways that serve local access</i> , that increase biking and walking, especially for short trips, first/last mile transit trips, and school trips.”   |
| 4 | 95 | Goal 1, Policy 3, bullet point 2           | “Grow the ATP <i>and other state transportation funding programs</i> to support a broad range of investments...”   |
| 4 | 95 | Goal 1, Policy 3, bullet point 3           | “Provide improved multimodal travel choices <i>for all people</i> through <i>safe, convenient</i> , high quality transit <i>and first and last mile connections that are</i> accessible to all communities across California.”   |
| 4 | 96 | Goal 2 - Fix-it-First and Asset Management | The Asset Management process presents an opportunity to not only prioritize maintenance investments based on the condition of the infrastructure, but also to prioritize based on local access needs for walking, bicycling, and transit access and complete streets improvements. This section should include discussion of fixing our roads and highways so they provide safe access for all users, and add specific policy recommendations for the Asset Management Plan process.   |

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| 4          | 102 | Goal 3, Policy 1, bullet 3 | “Prioritize funding toward efficient and affordable transportation options, <i>especially walking, bicycling, and transit</i> , to key job centers and local businesses to stimulate economic activity.”  |
| 4          | 102 | Goal 3, Policy 1           | Add a recommendation to increase job opportunities especially for low-income individuals and those with barriers to employment.   |
| 4          | 104 | Goal 4, Policy 1           | Include a specific policy recommendation that acknowledges disproportionately high and rising pedestrian and bicycle safety risks as motorist safety improves, and specifically prioritizes the safety of people walking and bicycling as the most vulnerable road users. |
| 4          | 108 | Goal 5, Policy 3, bullet 1 | “Ensure transportation strategies and investments <i>benefit</i> all people <i>by specifically prioritizing the safety and mobility needs of low-income communities of color and other vulnerable road users</i> regardless of income, age, or physical ability.          |
| Appendix 1 | 3   | Performance Metrics        | Add “ <i>Acre of habitat and open space converted</i> ” in the Environment section, “Conserve and enhance natural, agricultural and cultural resources”   |

Thank you again for allowing us the opportunity to comment on the Plan. This document has the potential to transform the state’s transportation planning and funding decisions in many communities in the state and create safe, healthy, walkable and equitable neighborhoods for people of all ages, incomes and abilities. We look forward to working with you to implement this important Plan.

If you have any questions, feel free to reach out to us at the email addresses below.

Sincerely,

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