



April 10th, 2023

Honorable Lee Ann Eager
Chair, California Transportation Commission
1120 N Street, MS 52
Sacramento, CA 95814

Re: Comments on the Draft California Transportation Plan Guidelines

Dear Chair Eager,

The Coalition for Clean Air and the undersigned organizations are thankful for this opportunity to comment on the draft California Transportation Plan Guidelines. We strongly support the robust public engagement process led by the California Transportation Commission staff that allowed us to engage in this update and submit some of our feedback early. While the current draft is already a strong step in the right direction, we have a few additional edits to help improve the efficiency and enforceability of the California Transportation Plan Guidelines.

1. Equity Considerations

While we strongly support the public engagement process conducted for this round of CTP Guidelines updates, we would like to see an improved public engagement process during the development of the California Transportation Plan itself. In particular, we want to see the state taking more measures to ensure that more of its public engagement funding is spent to support communities that provide input at the virtual and in-person workshops and meetings. One example would be to compensate community members and community-based organizations in the most-impacted communities for their time and expertise. This would allow members of low-income communities to not worry about the costs of transportation, child care, and lost working hours when attending the workshops, and would encourage more members of the

community to participate. It would also be useful if the CTP included clear guidelines on how to properly conduct public engagement to ensure that local governments and MPOs do the same.

We would also like to see a stronger consideration for how transportation investments are advancing equity goals. For example, the Justice40 initiative, authored by President Biden, establishes a goal of ensuring that disadvantaged communities receive 40% of the benefits provided by federal funding. The California Transportation Plan Guidelines can echo this priority by requiring that state transportation agencies advance Justice40 goals in state transportation investments and disaggregate estimated impacts and outcomes by race, ethnicity, and income. This would ensure that transportation investments benefit those who need them the most. We would also like to see a clear intent in the guidelines to not only avoid future harm to communities but repair past harm caused by transportation projects and investments.

2. Sustainability Considerations

We are very thankful for the strong sustainability considerations included in the guidelines update, such as requiring the reduction in GHG emissions and vehicle miles traveled (VMT) to meet the targets outlined in the California Air Resources Board's Scoping Plan and for the requirement to align the plan with the principles stated in the Climate Action Plan for Transportation Infrastructure (CAPTI). And while we appreciate the change to add criteria air pollutants to the list of quantitative metrics for the technical analysis, we would also want to see agencies further consider cumulative pollution burdens in their analysis and planning. Specifically, we would like the guidelines to include a consideration that transportation projects should not lead to an increase in air, water, noise, or light pollution, especially for disadvantaged communities.

As transportation funding in California continues to fluctuate, it is more important than ever to ensure that we are funding the right priorities. If we are to achieve the climate targets set by the CARB Scoping Plan and SB 32 (2016), we must begin prioritizing projects that decrease greenhouse gas and air pollutant emissions and disincentivize those that contribute to climate change and poor air quality. Thus, we would like to see the CTP Guidelines consider decreasing funding for highway capacity expansions and proportionately increasing funding for transit, bicycling, walking, and zero-emission charging and fueling projects. We also, critically, would like to see more maintenance funding leveraged to support complete street redesigns.

Finally, we request that the state makes a concerted effort to align its own performance metrics with similar metrics used to evaluate local governments, MPOs, and transit agencies. While the state has made some progress with the development and implementation of CAPTI, we often see local agencies and districts struggling to follow suit. If we are to ensure that state and regional actions are aligned, it's imperative that all levels of government are coordinated in their efforts. For example, if the state is expecting transit agencies to be working to increase transit ridership, then state and local governments should also be committed to, incentivized to, and evaluated against their ability to do the same. This could be fleshed out in the context of state goals and associated performance metrics in the California Transportation Plan Guidelines and the final CTP.

3. Fiscally Constrained Element

We strongly support the California Transportation Commission adopting the recommendations of AB 285 and including the fiscally constrained element as part of the Guidelines update. We also fully support making this section a part of the strategies element instead of simply being a topic to be addressed as suggested by the initial CTP draft. However, we are concerned that the proposed language does not go far enough in achieving the goals set by the AB 285 report.

The current language states that the fiscally constrained element seeks to “incorporate an analysis between the plan’s unconstrained vision and available resources and policy constraints.” The language then details how it plans to achieve this understanding, such as looking to estimate future levels of funding and developing a baseline scenario for future funding conditions. While we support this analysis to examine the gap between transportation revenue and need, we believe that the AB 285 report called for a more concrete approach.

Our vision for the fiscally constrained element would resemble a short-term implementation plan that looks at the recommendations proposed in the final CTP and determines the steps to achieve them. We believe this is backed by the AB 285 report which states that “describing who was expected to take action, when, and with which resources would allow plan efficacy to be tracked and evaluated.” This would mean taking a more detailed approach to provide clear guidance to agencies, private partners, and advocates for how we are to achieve the goals outlined in the CTP. While we understand that the CTP has several limitations, including the inability to propose and list specific projects, we nonetheless believe that the guidelines can still be used to help accelerate the transition of California’s transportation investments toward improving safety, accessibility, equity, and climate resiliency across the state. Thus, we request that the California Transportation Commission take another look at how the fiscally constrained element is to be developed and used, and amend the language to reflect the need for a short-term focused plan designed to help meet the financial requirements to implement the recommendations set in the California Transportation Plan Guidelines.

We sincerely appreciate this opportunity to provide feedback and hope to continue working with the CTC staff to further improve this document. Please reach out to Sofia Rafikova at sofia@ccair.org if you have any questions about any of the recommendations. Thank you for all of your work in ensuring that our state’s transportation investments promote equitable outcomes and provide clean and affordable mobility options for all Californians.

Sincerely,

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