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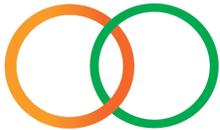
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October 22, 2020

John Thurston, Branch Chief, Statewide Long-Range Planning Branch
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001
CTP@dot.ca.gov

Dear Mr. Thurston:

On behalf of the undersigned organizations, we respectfully submit the following comments on the California Transportation Plan 2050. We appreciate the aspirations of the CTP and its goals

to provide a coordinated vision for transportation in California that reduces emissions, advances equity, and promotes public health. We acknowledge that developing a plan that addresses these intersections is difficult, and we commend Caltrans for undertaking the task.

Nearly 14 years ago, California established a comprehensive program to reduce greenhouse gas emissions from all state sources. Along the way, we have developed, refined, and reevaluated our ambitious climate goals, including most recently Executive Orders N-79-20, N-82-20, and N-19-19. We continue to strive to be the leader in the fight against climate change, and yet we have so much more ahead of us. The comments provided in this letter are meant to help push California even closer while ensuring climate justice and equity are central to any implementation efforts towards meeting these goals.

We are encouraged by many of the recommendations outlined in the Plan. We support the Plan's direction and see it is an important opportunity to advance our climate, equity, and public health goals. More specifically, we would like to express our support for the following recommendations:

- VMT reductions,
- Access to safe and convenient active transportation options,
- Improving transit and shared mobility options,
- Advancing transportation equity,
- Advancing ZEV technology and infrastructure,
- Improving goods movement systems and infrastructure.

While the development of the Plan happened before the pandemic started, it should be noted that the Plan does not account for our new reality. Right now, we have compounding crises, a devastating global pandemic, increased displacement and homelessness, life-threatening climate impacts, increased calls for racial justice, and a widening wealth gap. While it would have been challenging to plan for any of these, it must be said that this plan has blind spots in light of our current circumstances in terms of equity, safety, and health.

We would like to uplift some general themes that we would like to see bolstered and addressed more thoroughly throughout the Plan.

Prioritizing Equity

While we commend Caltrans for incorporating an equity portion into their plan, our overarching recommendation is, in addition to just having a separate equity goal, equity should be integrated into each strategy addressing the areas or people in most need. Below are some equity recommendations:

- When seeking public engagement, clarify what type of engagement, as seen in this [Public Participation Spectrum](https://sustainingcommunity.wordpress.com/2017/02/14/spectrum-of-public-participation/)¹. Agencies and communities need to understand where

¹ <https://sustainingcommunity.wordpress.com/2017/02/14/spectrum-of-public-participation/>

engagement level falls from the “inform” to the “empower” model. Caltrans needs to engage in genuine partnership and even ceding decision-making when appropriate.

- Include a process within all transportation project development and selection that shows not only that community engagement was done, but exactly how ideas and input from affected low-income communities and communities of color were incorporated and prioritized in the projects
- There is a need to compensate residents for providing their time and expertise during engagement and the need to provide technical assistance and capacity-building resources to communities and community-based organizations.
- Any investments that are earmarked for equity should uphold the [Greenlined Economy](#)² guidebook’s six standards for equitable community investment, which include: 1) Emphasize race-conscious solutions, 2) Prioritize multi-sector approaches, 3) Deliver intentional benefits, 4) Build community capacity, 5) Be community-driven at every stage, and 6) Establish paths towards wealth-building.
- To uphold equity as a practice across Caltrans’ programs, equity must be embedded throughout 1) the stated goal, 2) the process of how it’s developed, 3) the implementation, and 4) the evaluation -- as outlined in [Making Equity Real in Mobility](#)³.
- Accessibility (particularly in the context of shared mobility) should also be measured in terms of its technological, cultural, and financial access for people without smartphones, bank accounts, or non-native English speakers.
- Create a Caltrans definition of "vulnerability" that could shape and inform a statewide definition. This must have an equity lens and equity standards to determine what constitutes “the highest need issues” and areas, such as the Healthy Places Index.
- Ensure that performance metrics and information used in decision-making across all goals include disaggregated data that accounts for differences in race, gender, income, geography, age, and ability, among other population characteristics. Ensure that monitoring, evaluation, and data collection/analysis/mapping allow for comprehensive analysis of transportation equity progress, e.g., metrics to track access to essential services (school, grocery, parks, healthcare) and to transit and high-quality bike/ped infrastructure and trails by race, ethnicity, income, and neighborhood.
- Utilize the Caltrans Office of Racial Equity to develop and implement racial equity tools, analyses, and frameworks. California does not currently have any statewide plans that focus solely on equity. While the GARE efforts have served as a useful starting place, piecemeal, disjointed efforts are not enough.
- Conduct internal work inside state agency staff to assess equity readiness and train staff on diversity, equity, and inclusion. In complement to this effort, tools should be developed to help the agency deliver on equity and internal equity assessments to more consistently understand if they are ready to engage with the community, their gaps, and how to address them.
- To better achieve transportation goals, CalSTA, CTC, and Caltrans must strive to maximize community engagement by coordinating efforts to convene an equity advisory committee. The equity advisory committee should provide insight and guidance on transportation equity issues.

Achieve Our Climate goals

² <https://greenlining.org/publications/2020/greenlined-economy/>

³

https://greenlining.org/wp-content/uploads/2019/08/Toolkit_Making-Equity-Real-in-Mobility-Pilot-Projects_Final-1.pdf

The Plan appropriately draws on many other plans and builds on the earlier CTP 2040. However, it is unclear what progress, if any, has been made in the implementation of earlier plans or what barriers to implementation of earlier plans have been identified. To meet our climate goals, these types of assessments need to be made. We recommend the following climate goals:

- Provide clear and more robust objectives on how there will be a transition to a fully zero emission transportation system, rather than a “carbon neutral” one, which leaves the door open for polluting fuels. Additionally, there should be performance metrics attached to this goal to show how it will be measured. This should also be responsive to the recent Governor’s Executive Order on ZEVs, as well as aligned with CARB’s recent and upcoming rulemakings on Advanced Clean Trucks and Advanced Clean Fleets.
- Integrate strategies to reduce the contribution of road pavement (and related transportation infrastructure such as parking lots) to urban heat islands.
- The Plan heavily focuses on an increase in Zero Electric Vehicles, Electrical Vehicle charging stations, and incentives for EV purchases, but fails to provide how this will be done and measured, particularly for low-income households.

Improving Quality of Life

Our transportation system is inextricably linked to the quality of life. As we strive to make our transportation system cleaner, it is not enough if it is not accessible transportation in certain areas, particularly low-income and rural areas. Quality transportation promotes quality health outcomes.

Below are health-related suggestions:

- Place a performance measure for the expansion of transportation, including infrastructure. It should also include a measure on the number of bus lines/stops added as well as bike and pedestrian ways, as well as ensuring sufficient operating dollars to run any new investments.
- Quality of life and Public Health should also include an element on cleaner air. Many highways and freeways near low-income communities have been linked to respiratory diseases such as asthma and should be taken into more consideration since those with pre-existing conditions might have a harder time recovering from COVID-19.
- There does not appear to have been a comprehensive assessment nor integration of health risks and benefits in the Plan. We recommend that the full range of impacts of transportation on health, and health equity, be more fully integrated. Specifically, we recommend creating a process to incorporate health and equity considerations into the prioritization of strategies, analysis of policy and program options for purposes of prioritization, data collection and analysis, and scenario planning/analysis.
- The Plan should build on prior work on the integration of health benefits of physical activity into analysis and discussion, and include strategies to integrate analysis of full range of health benefits into the planning process - including regional and state scenario analysis, for example, through use of tools such as iTHIM.

- ZEVs alone will not be sufficient to address air pollution impacts of transportation: the Plan should also identify measures to address PM pollution related to brake and tire wear, which is currently best limited through reduced VMT.

We have provided more specific comments and recommendations regarding the Plan below:

Pg: 100 - Our Path Forward: Expand Access to Safe and Convenient Active Transportation Options	
Comments	<ul style="list-style-type: none"> • We fully support the important emphasis on reduced VMT and acknowledge that shifting mode share to transit and active transportation must meet reduced VMT goals.
Recommendations	<ul style="list-style-type: none"> • Require complete streets elements for all state transportation road projects to make all communities and neighborhoods more livable and ensure non-auto travelers' safety. All transportation projects should have complete streets elements, such as protected bicycle lanes, expanded sidewalks, ADA accessible infrastructure, and providing first-last mile transit access for all state transportation road projects. • Explore other funding programs for active transportation projects besides existing ATP allocations. To shift mode share, more funding will be required to build bike/walk infrastructure. • Revise design guidelines to encourage slower speeds, and safer shared roadways by, for example, increasing minimum widths of bike and pedestrian facilities and decreasing minimum widths of traffic lanes. • Identify funding for walking and biking throughout the transportation funding portfolio; commit to substantial increase in the proportion of transportation funding that goes to transit, walking, and biking. • Implement strategies to reduce heat exposure for bicyclists and pedestrians. • Whenever transportation infrastructure is abandoned, such as obsolete freight land or freeways slated for removal, allocate a portion of the land's value as reparations to descendants of people displaced by the infrastructure in the first place. • Increase bicycle mode share by prioritizing investment in completing low-stress bikeway networks in all communities
Pg:101 - Our Path Forward: Improve Transit, Rail, and Shared Mobility Options	
Comments	<ul style="list-style-type: none"> • Disadvantaged communities should be empowered to shape the selection, development, and deployment of shared mobility options in their communities in a way that meets their mobility needs.

	<ul style="list-style-type: none"> State-funded, community-driven mobility pilots such as Mobility Hubs at Affordable Housing Sites⁴, Clean Mobility Options⁵, and the Sustainable Transportation Equity Project⁶ are proving to be innovative ways to empower communities. There is enormous excitement and demand for these kinds of programs from communities across the state, many of whom have already submitted thorough and thoughtful applications for these funds. California state agencies should coordinate to co-fund these types of innovative clean mobility equity programs and pilots.
Recommendations	<ul style="list-style-type: none"> Use the Mobility Equity Framework⁷ to assess and compare shared mobility options in a way that meets the needs of disadvantaged communities and hands them decision making power Once the community has selected a shared mobility option, we recommend that the Making Equity Real in Mobility Pilots⁸ is used as a guide to embedding equity into the mission, process, implementation, and evaluation of the mobility program. Implement shared mobility systems as public systems or as public-private partnerships to enhance public transit while meeting high standards for affordability, accessibility, labor practices, and environmental impact.

Pg: 102 - Our Path Forward: Advance Transportation Equity

Recommendations	<ul style="list-style-type: none"> Require CalSTA, CTC, and Caltrans to maximize community engagement by coordinating efforts to convene an equity advisory committee. The equity advisory committee should provide insight and guidance on transportation equity issues. Redesign roadways and intersections to make walking and biking more convenient to reduce the need to violate the law, e.g., eliminate push button crossings, add midblock crosswalks, reduce stop signs on bike routes. Ensure that transportation funding streams are eligible to fund foundational aspects of equity such as 1) community organizing, 2) capacity building, 3) outreach and engagement expenses such as compensating residents for their time and expertise, food, childcare, language services & transportation. Include metrics that describe how community participation has led to, for example, specific reform of transportation policies and specific projects. Expand on the performance measures and ensure the equity goal's objectives are especially enforced in rural communities. Require or incentivize participatory budgeting that focuses on directing resources to low-income communities and communities
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⁴ <https://ww3.arb.ca.gov/msprog/lct/pdfs/mobilityhubs.pdf>

⁵ <https://www.cleanmobilityoptions.org/>

⁶ <https://ww3.arb.ca.gov/msprog/lct/opportunitiesgov/step.htm>

⁷ <https://greenlining.org/publications/2018/mobility-equity-framework/>

⁸ <https://greenlining.org/publications/reports/2019/making-equity-real-in-mobility-pilots-toolkit/>

	of color that have long been excluded from transportation investments due to historical and current institutional racism.
Pg: 103 - Our Path Forward: Enhance Transportation System Resiliency	
Recommendations	<ul style="list-style-type: none"> • Be explicit in the opening description that disadvantaged communities will be more heavily impacted by climate change and natural disasters. • Utilize the Mobility Equity Framework⁹ 3 step process to assess and compare various adaptive strategies based on communities' specific needs, particularly frontline, vulnerable communities. • The existing practices of actions 7 and 10 both should expand their equity approach, for example, by prioritizing funding allocations, planning grants, implementation support, capacity building, and technical assistance to low-income communities and communities of color. • Whenever improvements are made, "green infrastructure," such as swales, permeable pavement, trees, and green roofs, should be implemented as much as feasible.
Pg: 106 - Our Path Forward: Improve Goods Movement Systems and Infrastructure	
Recommendations	<ul style="list-style-type: none"> • Include an objective that prioritizes infrastructure improvements and maintenance on a needs basis, based on traffic fatalities, air pollution, poverty levels, and other factors. This objective will also need performance measures to track this progress. • Include an objective to ensure that no new infrastructure projects divide, harm, or negatively impact low-income or tribal communities. • Regarding the performance measure, "lane-miles repurposed," we recommend clarifying what the lanes are being repurposed for. • Evaluate existing infrastructure for potential upgrades, replacement, or removal based on how infrastructure created and reinforces racist practices based on historical redlining and other inequitable land use. • Implement a pilot project to encourage, where feasible, delivery by bikes, including 3- and 4-wheel electric cargo bikes.
Pg: 107 - Our Path Forward: Advance Zero-Emissions Vehicle (ZEV) Technology and Supportive Infrastructure	
Recommendations	<ul style="list-style-type: none"> • To the following statement, "Require TNCs and other car-sharing services to transition to electric vehicle fleets consistent with the statewide rate of electric vehicle adoption," we recommend including language that "this should occur without placing the burden on drivers or relying on state funds to advance such goals." • Include the action that ZEV adoption incentives must prioritize low-income households. Incentives should be in the form of vouchers or buy-downs, not after purchase rebates, and should be

⁹ <https://greenlining.org/publications/2018/mobility-equity-framework/>

	<p>available for used ZEVs and other non-emitting low cost transportation options.</p> <ul style="list-style-type: none"> ● Include the action that Caltrans must convert their own fleet to ZEVs, including heavy-duty. In this action, Caltrans should also help permit charging/fueling infrastructure on land they control. To advance ZEV technology, Caltrans needs to work with other agencies, such as CARB, so that we reach our ZEV goals.
Pg 108 - Our Path Forward: Manage the Adoption of Connected and Autonomous Vehicles	
Recommendations	<ul style="list-style-type: none"> ● The recommendations in this section should be aligned with the Equity goal to “Improve transportation-related economic outcomes for disadvantaged communities.” Therefore, we recommend exploring policies that will create a social safety net and retraining programs for drivers who are replaced by CAVs. ● For a detailed list of equity-focused policy recommendations across transportation, safety, access, VMT, and economic opportunities, and more, refer to Greenlining’s Autonomous Vehicle Heaven or Hell report¹⁰. ● Improve the language to more explicitly acknowledge that autonomous vehicles could dramatically increase sprawl, vehicle miles traveled, and inequality, unless they are strictly regulated to emphasize public, shared use and severely limit personal ownership and use.
Pgs: 109 - 110 - Our Path Forward: Price Roadways to Improve the Efficiency of Auto Travel	
Comments	<ul style="list-style-type: none"> ● Regarding the revenue generated from roadway pricing, we recommend applying our Greenlined Economy¹¹ guidebook’s six standards for equitable community investment, as mentioned earlier in the overarching equity comments.
Recommendations	<ul style="list-style-type: none"> ● Investment in non-auto travel options should be required and these investments should begin prior to the implementation of road pricing programs. ● Provide disadvantaged communities and those most vulnerable with other travel options before cities start to implement the road pricing programs. This could be re-designating existing lanes for bus lanes along corridors subject to roadway pricing, increasing bus service to destinations impacted by pricing, or expanding biking infrastructure to provide people with viable alternatives to driving. ● Using road pricing to fund transit and other transportation alternatives. This reinvestment strategy would allow low-income groups and people of color to benefit while revenues would be derived from drivers, who tend to be wealthier than other

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<https://greenlining.org/publications/reports/2019/autonomous-vehicle-heaven-or-hell-creating-a-transportation-revolution-that-benefits-all/>

¹¹ <https://greenlining.org/publications/2020/greenlined-economy/>

	<p>commuters. Reinvesting these revenues into transit, walking, and bike infrastructure would allow a greater shift to more affordable and sustainable transportation modes.</p> <ul style="list-style-type: none"> • Build in extensive community engagement to ensure funds raised by road pricing fund the projects and programs most needed by disadvantaged groups impacted by pricing.
Pg: 111 - Our Path Forward: Encourage Efficient Land Use	
Comments	<ul style="list-style-type: none"> • Emphasize and encourage better co-location of housing, jobs, and other vital services to decrease the need to travel far away distances. • Ensure this planning document does not contribute to re-segregation¹², where low-income communities and communities of color are pushed to the exurban fringe, or they continue to be divested as cities and communities develop on the outskirts stretching infrastructure and public transportation dollars that could be used much more efficiently on equitable infill capacity. • Commit to the successful implementation of SB 743 and ensure it addresses the concerns for low-income communities and communities of color. SB 743 could make it easier to build developments within existing communities and even create incentives for developments that meet certain criteria that will benefit these communities, such as affordable units or local hire. It can also make it easier for local and regional agencies to invest in more innovative transportation solutions such as ride sharing and micro-mobility, which can help more rural communities not be dependent on automobiles. • All major investments that impact land use and transportation should include meaningful community participation in every aspect of project design.
Pg: 114 - Our Path Forward: Seek Sustainable, Long-Term Transportation Funding Mechanisms	
Comments	<ul style="list-style-type: none"> • The plan appropriately acknowledges the need to pursue new sources of transportation funding beyond the gas tax. As we are moving to cleaner vehicles and a cleaner transportation system we need to begin thinking about what type of revenue will be funding our transportation. This process should include extensive community engagement, and new funding tools must include design features that ensure they are not regressive.
Recommendations	<ul style="list-style-type: none"> • Ensure that any state-level fee on ride-hailing companies is not passed on to the driver and instead is the responsibility of the TNC company. • Revenue distribution from sustainable, long-term transportation

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<https://sanfrancisco.cbslocal.com/2020/06/16/project-home-study-race-discrimination-housing-real-estate-bay-area/>

	<p>funding mechanisms should center equity and the ability to be flexible to meet community needs. Our recommendation is to apply our Greenlined Economy guidebook’s six standards for equitable community investment, as further elaborated on in the overarching equity comments. Ensure GGRF funds prioritize VMT reducing projects and disadvantaged communities’ needs and that funds are protected for this use.</p> <ul style="list-style-type: none"> ● The recommended action items do not sufficiently address the crisis that public transportation faces in light of COVID-19. Immediate action must be taken to fill the operations funding gap faced by agencies across the state to maintain service. ● Pursue the reallocation of funding from VMT-inducing projects such as highway widening toward public transit operations.
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We have provided more specific comments and recommendations regarding the CTP Strategies Element below:

Pg: 15 - Goal: Achieve statewide GHG emission reduction targets and expand resilience to climate change	
Recommendations	<ul style="list-style-type: none"> ● Regarding “Subsidize clean and electric vehicle transportation in rural areas” <ul style="list-style-type: none"> ■ We recommend supporting and co-funding CARB projects in rural areas such as the Rural School Bus Pilot, the Ecosystem or Shared Mobility in the San Joaquin Valley, and the Agricultural Worker Vanpool. ● Regarding “Support and expand ARB programs aimed at decarbonizing the transportation sector, including but not limited to the Advanced Clean Cars, Advanced Clean Trucks, Accessible Clean Transportation Options, Clean Cars 4 All, and numerous other programs “ <ul style="list-style-type: none"> ■ We particularly recommend supporting and co-funding the CARB programs that are community-driven and serve disadvantaged communities, such as Clean Mobility Options, the Sustainable Transportation Equity Project, Mobility Hubs at Affordable Housing Sites, and Clean Mobility in Schools.

We have provided comments on items that are outside the scope of the California Transportation Plan 2050, but should be priorities for Caltrans.

Recommendations	<ul style="list-style-type: none"> ● Shift funding from policing at mass transit stations and associated vehicles to mass transit operations and free/discounted fares. Policing is an expensive safety strategy and also increases the

	<p>potential for violent encounters in disadvantaged communities. The state should distribute funds towards safety strategies with humane and effective outcomes—shift funding towards operations, sanitation, and life-supporting services relevant to transit riders due to COVID.</p> <ul style="list-style-type: none"> ● Work with the legislature to enact emergency legislation to redirect legally movable transportation funds to transit operations. ● Decriminalize common traffic and transit behaviors like midblock crossing and rolling through stop signs on a bike when safe. Low-income communities and communities of color are disproportionately policed and fined for these minor infractions. ● Work with the newly established task force on reparations per AB 3121¹³. Ensure that the transportation system is held accountable for its historically racist and discriminatory practices. ● Work with local agencies to co-develop anti-displacement plans in partnership with impacted communities. See examples of transportation grant program requirements to co-develop anti-displacement plans with Clean Mobility Options¹⁴ and the Sustainable Transportation Equity Project¹⁵. ● Work with CalSTA to develop a climate risk assessment guide. California should require a multi-factor climate test on all major transportation infrastructure projects, requiring an evaluation of the direct and induced lifecycle pollution and climate change impacts, compatibility with the 2045 carbon neutrality goal, and the vulnerability of infrastructure resulting from expected increased climate impacts. ● Work with cities to consider programs that would provide subsidies, discounts, caps, and exemptions to low-income drivers. Cities should design programs that would lower or waive tolls to low-income drivers for their trips into the congestion pricing zone. These programs should be coupled with existing assistance programs. ● Work with the Legislature and State agencies to remove barriers to implement the Automated Enforcement Programs for speeding and redlight violations. The State must ensure an unbiased placement of cameras in implementing automated enforcement and that proceedings from automated enforcement programs are used for GHG-reducing transportation programs. ● Regarding CAVs, more explicitly acknowledge that autonomous vehicles could dramatically increase sprawl and inequality unless they're strictly regulated to emphasize public, shared use and severely limit personal ownership and use.
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While we understand many of these recommendations are not in the Plan’s scope, we want to uplift them because we need intersectional and multi-agency approaches to the transportation

¹³ https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200AB3121

¹⁴ <https://www.cleanmobilityoptions.org/>

¹⁵ <https://ww3.arb.ca.gov/msprog/lct/opportunitiesgov/step.htm>

system. We appreciate the opportunity to submit comments for the CTP 2050. We look forward to working collaboratively on a safer, healthier, more equitable climate affirming California.

Sincerely,

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