



August 27, 2018

Susan Bransen, Executive Director  
California Transportation Commission  
1120 N Street, MS-52  
Sacramento, CA 95814

**Re: Comprehensive Multimodal Corridor Plan Draft Guidelines**

Dear Ms. Bransen:

Our organizations represent a broad mobilization of transportation stakeholders and we appreciate the intent of the Comprehensive Multimodal Corridor Plan Guidelines (plan guidelines) to advance the goals of the Solutions for Congested Corridors Program (SCCP). As outlined in SB 1, the SCCP aims to “reduce congestion in highly traveled corridors by providing more transportation choices for residents, commuters, and visitors to the area of the corridor while preserving the character of the local community and creating opportunities for neighborhood enhancement projects.” This goal is supported by restricting program funds from being used for general purpose lane highway expansion and by scoring criteria that focus on improving accessibility while reducing vehicle-miles traveled (VMT). The SCCP, and these companion draft plan guidelines, provide a new opportunity for regions to improve travel in the most congested corridors by incentivizing projects that benefit and improve communities long overburdened by large, dangerous, unhealthy, and congested freeways.

However, we believe much more can – and should – be done to better reflect the intent of the statute for the SCCP through the proposed draft plan guidelines. We recommend the CTC incorporate the following recommendations in the guidelines:

- Prioritize *balanced, meaningful, and comprehensive* multimodal investments to effectively reduce congestion and expand travel choices.
- Ensure that plan guidelines explicitly prioritize and reflect all criteria listed in statute for the creation of the SCCP.

- Bolster community outreach, engagement, and participation through Section 8 of the planning guidelines.

**Prioritize balanced, meaningful, and comprehensive multimodal investments to effectively reduce congestion and expand travel choices.**

**Highway lane capacity increasing projects should be a last resort**

The plan guidelines should better prioritize multimodal investments and provide balanced transportation options, rather than primarily spurring private vehicle occupancy. The vast majority of the SCCP Cycle 1 project awards were to highway expansion through the proposed development of managed, priced, HOV, and/or HOT lanes. This is unacceptable. Future cycles of the SCCP should align with the intent of the program and provide more transportation choices outside of highway capacity increasing projects. There needs to be explicit de-prioritization of any highway capacity expansion for private vehicle use by funding managed and priced lanes only as a last option, except if such lanes are the result of general purpose lane conversion. And if managed or priced lanes are funded, the projects should be required to reinvest the revenue generated back into transit, walk, and bike improvements in the corridor to provide non-driving travel options, similar to the investment model established by LA Metro in the I-10/I-110 corridor.

<sup>1</sup> The Comprehensive multimodal corridor plan guidelines should provide an additional screening and a guiding framework for the SCCP in meeting this very important state goal. Without explicit prioritization for balanced transportation choices, the SCCP, which these draft plan guidelines oversee, is susceptible to being a misused planning and political process that simply provides maximum flexibility for regional and local agencies to plan their own local agenda, rather than investing state dollars to meet state goals.

**Incentivize projects that result in increased walking, bicycling, and transit outcomes**

As the goal of the SCCP is to provide more transportation choices in a corridor, the plan guidelines should incentivize projects that improve walking, biking, and transit options. We recommend that plans should be required to meet criteria or metrics to have significant and balanced multimodal investments, and not skew investments in corridor improvements for private vehicle travel. Furthermore, we recommend projects that improve walking, biking, and transit service in a corridor should be prioritized for funding ahead of projects that increase speed or capacity for private vehicle travel. Walking and bicycling improvements must be paired with building and operating successful transit service in a corridor to facilitate longer trips and attract high transit ridership. Investing in walking, bicycling, and transit connections first in a corridor will support efficient and sustainable land uses in a more transit-oriented pattern. To be clear, multimodal approaches do not include less than 2-miles of bike trails alongside the addition of abundant new lane miles for private vehicles, as is the case in the awarded 'US 101 Santa Barbara Multimodal Corridor' project. Instead, multimodal corridor road improvements should be designed as complete streets that provide seamless low-traffic-stress walking and bicycling connections to destinations along the corridor.

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<sup>1</sup> See: <http://www.itscalifornia.org/Content/AnnualMeetings/2015/Presentations/TS11-4-MTA-NetTollRevenueReinvestment.pdf>

**Ensure the guidelines reflect the intent of the statute by funding projects that avoid sprawl and reduce VMT**

The plan guidelines need to be strengthened to better reflect the merits and intent of statute. Statute specifically states that these funds should go to “new ways to address congestion”, and that “multimodal approaches reduce congestion by expanding travel choices, improving the quality of life, and preserving the local community character within the corridor”. Furthermore, the statute stresses that funds go to “multimodal proposals that address mobility, community, and environmental challenges along highly traveled corridors”. We recommend that the guidelines include language that ensures that corridor plans do not induce sprawl development and include evaluation criteria for highway and local road projects to assess the impacts of induced demand and avoidance of induced sprawl. Reducing vehicle miles traveled (VMT) is a critical piece of the puzzle to improving mobility and achieving our state’s climate goals.

To ensure these guidelines further this goal, we recommend requiring analysis of induced demand, as measured by induced vehicle miles traveled, in corridor plans under Section 9.2 Key Elements of a Comprehensive Multimodal Corridor Plan of the Draft Guidelines. The Governor’s Office of Planning and Research provides a simple methodology for analyzing induced demand in their Technical Advisory on Evaluating Transportation Impacts in CEQA that is accessible to all jurisdictions and does not require travel models or other sophisticated analyses.<sup>2</sup> In addition, we recommend adding “VMT per capita” as a corridor performance measure to Section 9.3 Table 1.

**Ensure that plan guidelines explicitly prioritize and reflect all criteria listed in statute for the creation of the SCCP.**

**Add specific guidance to achieve state goals**

The plan guidelines make an effort to carryover important statutory elements from the SCCP such as suggesting that comprehensive multimodal corridor plans must conduct a performance assessment. However, simply listing the SCCP criteria does not go far enough to ensure corridor plans fully beget multimodal and sustainable projects. For example, Section 4 in the plan guidelines clearly defines the intent of comprehensive corridor plans and how they should shape potential projects. However, much more needs to be incorporated into the plan guidelines rather than just referencing the SCCP guidelines. If plan guidelines are to “inform the decision-making process and provide communities with an overall vision for the future of the corridor including guidance and coordination for future improvements necessary to meet corridor plan goals”, then the plan guidelines need to add more specific guidance on state goals of increasing multimodal options and decreasing VMT.

We understand a key obstacle to mandating state directive is certainly the local distinctions of capacity and contexts. However, we recommend the CTC use its position and authority directing statewide transportation policy to incentivize the alignment of coordinated projects under

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<sup>2</sup> See: [http://opr.ca.gov/docs/20180416-743\\_Technical\\_Advisory\\_4.16.18.pdf](http://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf)

synchronized goals. For instance, we believe it is insufficient for the CTC to only provide examples of what *may* be in a corridor plan. The examples of Section 9.3 are not enough to provide state-level guidance to local agencies so as to decrease statewide corridor congestion. We recommend the CTC include a list of what shall be included in a corridor plan to decrease congestion in statewide corridors. Without this clear mandate, “performance assessments” can easily be used to support proven inadequate congestion strategies based on flawed or archaic engineering practices or vulnerable to the influence of private industry and business interests which have the consequence to not meet the needs of our most disadvantaged and overburdened communities.

**CTC should play a stronger role to determine whether or not plans achieve the goals of the SCCP**

Finally, one of the most important sections of the draft plan guidelines, Section 10 referring to SHC Sections 2391 and 2394, details the role of the CTC in reviewing comprehensive multimodal corridor plans. This section is an ideal opportunity for the CTC to assert its statutory authority to meet the goals and merit of the SCCP. Unfortunately, the plan guidelines stop short of the CTC’s statutory role. Right now, the guidelines limit the CTC to determining only if a “proposed project is consistent with the objectives of the corridor plan”. Not only should there be some sort of evaluation or metric to determine “consistency”, but more fundamentally, statute actually does not make that limitation. Instead, it continues to explicitly elaborate that corridor plans are to be “designed to reduce congestion in highly traveled corridors by providing more transportation choices for residents, commuters, and visitors to the area of the corridor while preserving the character of the local community and creating opportunities for neighborhood enhancement projects”. The corridor plan itself, not just the SCCP criteria, is mandated to further a “balanced set of transportation, environmental, and community access improvements”, “more transportation choices”, and “creating opportunities for neighborhood enhancement projects”. Therefore, CTC should be basing its review -- and should be clear in the corridor plan guidelines -- that these provisions apply to the corridor plans itself and should be an overall guide to related SCCP projects. This would mean that the CTC would apply some sort of related SCCP criteria/evaluation to the plan guidelines to help support appropriate project adoption.

**Bolster community outreach, engagement, and participation through Section 8 of the planning guidelines.**

We appreciate Section 8 of the plan guidelines involving stakeholder and community outreach. We also value the additional extent in which the CTC encourages going beyond the collaboration between governmental agencies in developing outreach plans by including community-based organizations. However, involving community stakeholders in the corridor planning process should be elevated to go beyond just outreach, to include earlier and more meaningful forms of engagement that ensure the needs and priorities of underserved and overburdened communities are both identified and addressed.

To that end, we recommend that the CTC rank proposed plans regarding the extent to which low-income residents, and residents of disadvantaged communities and low-income communities, have been meaningfully engaged in the process of identifying and prioritizing their needs, and developing and selecting the proposed projects that will best address those needs. In particular, we recommend that the CTC use the updated ranking structure others have developed, attached as Appendix A, “Table on Levels of Community Engagement.”

Integrating rigorous criteria for actual engagement and participation will help evaluate and prioritize project/plan benefits, as identified by residents impacted by the project, especially for disadvantaged and low-income residents in adjacent communities. The criteria will require applicants to demonstrate that the impacted community was meaningfully engaged in plan development, especially engagement with low-income residents.

Intensive and ongoing input from the community should guide the growth of successful corridors. In order to meet the program goal of, “improv(ing) transportation choices while preserving the character of the local community”, project sponsors must have a clear understanding of what travel options the community would embrace, and what impacts on the local community’s well-being must be avoided. The community’s vision must be incorporated into the project design through robust outreach and engagement of residents, including low income people and people of color, and community-based organizations that work with these residents in the development of a project, and stakeholders should be consulted throughout project implementation to address issues and concerns that arise.

We believe the plan guidelines are a good opportunity, as suggested, to develop coordination that should occur between the Caltrans and local and regional partners as they work together to expand community needs assessments through the Senate Bill 350 implementation process. We appreciate the mention of the minor reference to the low-income barriers study led by the Air Resources Board, but we think it is an excellent opportunity for the CTC, not just Caltrans and local agencies, to be more involved in leading its assigned responsibilities in that study. Specifically, the CTC is directly responsible for “focusing on local needs of low-income residents and disadvantaged communities as part of Regional Transportation Plan development and other local, State, and regional planning and direct funding to gaps identified”.<sup>3</sup> Furthermore, the study also charged the CTC to “identify and expand funding and financing for clean transportation and mobility projects, including infrastructure, to meet the accessibility needs of low-income and disadvantaged Communities”. We suggest that the CTC set aside the SCCP funds, or other planning funds through other CTC-administered sources, to develop the collaborative and inclusive planning necessary to meet all of the needs of residents in and adjacent to the state’s congested corridors.

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<sup>3</sup>[https://www.arb.ca.gov/msprog/transoptions/sb350\\_final\\_guidance\\_document\\_022118.pdf?\\_ga=2.33662690.258946161.1535404653-1345443789.1529942521](https://www.arb.ca.gov/msprog/transoptions/sb350_final_guidance_document_022118.pdf?_ga=2.33662690.258946161.1535404653-1345443789.1529942521)

Thank you for your consideration. We look forward to working with you on the Comprehensive Multimodal Corridor Guidelines. If you have any questions about these comments, please contact [jared@calbike.org](mailto:jared@calbike.org).

Sincerely,

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## Appendix A. Table on Levels of Community Engagement.

*We recommend the following community engagement ranking structure to ensure that each investment project meaningfully addresses an important community/low-income household need:*

Engagement will be ranked “**high**” (i.e. demonstrating community leadership and decision-making for a majority or all of a project) where one of the following is met:

- A community-based organization (CBO) led by, or with a mission to serve, disadvantaged/low-income community residents or low-income households is the lead applicant or co-applicant to receive funding from project;
- Disadvantaged/low-income community residents or low-income households oversaw the entire process of needs assessment and prioritization, project development and project selection as members of a steering committee that, in partnership with project applicant, designed the process and oversaw the implementation of the process (e.g., through a Participatory Budgeting approach);
- A community-owned/developed plan is funded as the majority of or an entire project; or
- Two or more of the indicators under “moderate” engagement (below) have been met.

Engagement will be ranked “**moderate**” (i.e. demonstrating community collaboration and partnership) where any one of the following has taken place:

- A plan developed by community residents or low-income households is funded for a component of a project (e.g., assistance with funding grassroots participation, provision of technical assistance, aid in project implementation);
- Stakeholders signed a memorandum of understanding regarding a component of a project that clearly designates the roles, responsibilities, compensation, and authority of each partner, and in which core partners are low-income households and/or CBOs with a specific mission to serve them. The partnership includes either a shared decision-making authority, or delegation of duties directly responsible for project outcomes and implementation, for multiple phases of project development or implementation;
- Before the development or selection of project alternatives, at least one meeting took place in which disadvantaged/low-income community residents or low-income households deliberated to identify and prioritize the unmet needs of their community, provided that the project demonstrates it will address one of the priority needs identified;
- Disadvantaged/low-income community residents or low-income households participated, with technical support, in the development of project alternatives that would address one or more of those priority unmet needs that were identified in the recent past through such a meeting as described in the bullet above;
- Disadvantaged/low-income community residents or low-income households exercised decision-making authority to select the preferred project from among two or more alternatives, either as members of a project selection committee or through a community voting process;

- The project sponsor engages disadvantaged/low-income community residents or low-income households as true partners in the development of project alternatives, and the selection among those alternatives, in another manner; or
- The project sponsor provides funding to CBO(s) led by, or with a mission to serve, disadvantaged/low-income community residents or low-income households to conduct community engagement activities consistent with any of the above.

Engagement will be ranked “**low**” where none of the above have taken place, regardless of the extent of outreach, education, and consultation activities, such as the following:

- Community and agency collaborate and mutually learn from each other in earlier stages of project development in designing and implementing the project; or
- Applicant conducts community consultation (e.g., via workshops, roundtable discussions, focus groups, surveys) where applicant documents and reports how consultation has influenced the final project. Community consultation sessions are held at diverse, accessible times and locations.

Points can be awarded for high, moderate and low, with zero points for none of the listed community engagement activities (e.g., merely informing community of investment/project opportunities and/or allowing comments on agency proposals.)