



California Transportation Commission

March 8, 2022

Dear Commissioners,

At your March meeting, you will be adopting updated guidelines for the State Highway Operations and Protection Program (SHOPP). These will be the first major guidelines to be revised since the adoption of the Climate Action Plan for Transportation Infrastructure (CAPTI) and we, the undersigned organizations, urge you to ensure they expressly integrate both the CAPTI Framework and the Caltrans Equity Statement.

Our groups appreciate how important the SHOPP is to maintaining the state's roads and bridges in good repair and appreciate the methodical approach the state is taking. Over the past couple of years, we have also seen Caltrans and CTC begin to integrate Complete Streets and climate adaptation into the planning process for SHOPP.

Yet more needs to be done to both prevent and prepare for the worst impacts of climate change. In addition, the tremendous amount of funding in the SHOPP can help balance long-standing inequities in our transportation system. That is why the undersigned groups would like the CAPTI Framework and the Caltrans Equity Statement (CES) more thoroughly woven into the fabric of the SHOPP guidelines.

Many of our organizations met with your staff and we appreciate how receptive they have been to considering additional changes to the guidelines. Though there was not sufficient time to incorporate them we hope they can be adopted at the March CTC meeting. They include:

1) Stronger CAPTI and Caltrans Equity Statement Statements

In Section 17 it states that "Caltrans **shall take** CAPTI strategies as well as the CES **into consideration** in the development and implementation of the Transportation Asset Management Plan" and in Section 18 that statement applies to the State Highway System Management Plan.

We believe it should be stronger and state "Caltrans **shall expressly incorporate** CAPTI strategies and policies in the development and implementation of the ..." in both of these sections.

2) Inclusion in the Performance Benchmark Report

When Caltrans provides an annual report on targets and performance measures to the Commission, we believe it should include a section outlining progress towards implementing strategies and metrics in the CAPTI framework and the Caltrans equity statement. We understand such measures may need to be developed and is not a statutory requirement, but we believe it is vital.

3) Improving the SHOPP information available to the public

We greatly appreciate the work Caltrans has done to make the SHOPP more transparent, especially the development of the 10-year SHOPP Project Book that allows an interactive map-based view of all of the projects in the SHOPP pipeline. In the SHOPP Preparation, we'd like to see:

- The Complete Streets Decision Documents (CSDD) for each project that has one included with the project description. This is the best way to understand not just

what complete streets elements were included or not, but the decision-making process that led to it.

- Publish the four-year SHOPP document in a CSV or excel-based tabular format to allow for ease of review. While this could potentially be accomplished by filtering the Project Book doing so may be complicated for some stakeholders.
- We'd like the project descriptions to use specific and objective language (e.g. "widen bridge") to describe projects and avoid ambiguous value-based terms (e.g. "improve" or "upgrade").

4) Public Review of the Initial Draft of the proposed SHOPP

The guidelines call on Caltrans to release the **initial draft** of the proposed SHOPP with Regional Transportation Planning Agencies by December 7 of odd-numbered years. We'd like to see it released to members of the public as well as well at that time.

We urge you to adopt these recommendations at the March meeting. Transportation's share of California's GHGs has been growing, and now represents 50% of the total; with over 40% as direct tailpipe emission and another 10% for transportation fuel refining and distribution. We must do everything possible to ensure all investments, even those primarily focused on a fix-it-first framework, are doing all they can to incorporate strategies that advance both climate protection and racial equity.

Thank you for all you are doing and please feel free to reach out to any of us or contact Stuart Cohen, TransForm's Senior Policy Advisor, at Stuart@Transformca.org for more information.

Sincerely,

Amy Thomson, Transportation Policy Analyst
TransForm

Jonathan Matz, California Senior Policy Manager
Safe Routes Partnership

Jared Sanchez, Policy Advocate
CalBike

Caro Jauregui, Co-Executive Director
California Walks

Carter Rubin, Interim Director of Transportation
NRDC

Nailah Pope-Harden, Executive Director
ClimatePlan

Liz O'Donoghue, Dir., Sustainable and Resilient Communities Strategy
The Nature Conservancy

Julia Randolph, Policy and Outreach Associate
Coalition for Clean Air

David Diaz, Executive Director
Active San Gabriel Valley

Eli Lipmen, Director of Programming and Development
Move LA

Laura Tolkoff, Transportation Policy Director
SPUR

Matthew Baker, Policy Director
Planning and Conservation League

Joanna Gubman, Executive Director
Urban Environmentalists

Laura Cohen, Western Region Director
Rails-to-Trails Conservancy

Bryn Lindblad, Deputy Director
Climate Resolve

Faraz Rizvi, Special Projects Coordinator
Center for Community Action and Environmental Justice

Marven Norman, Executive Director
Inland Empire Biking Alliance

Kevin Hamilton, CEO
Central California Asthma Collaborative

Arnold Sowell, Jr., Executive Director

NextGen California

CC: Mitch Weiss, CTC
Jon Pray, CTC
Tim Sobelman, CTC
Steven Keck, Caltrans
Mike Johnson, Caltrans