



January 19, 2024

Tony Tavares  
Director of the Department of Transportation  
1120 N Street Sacramento, CA 95814

RE: Comments on the 2024 State Highway Operations and Protection Program

Dear Director Tavares:

On behalf of the undersigned organizations, we write to share the following comments on the proposed 2024 SHOPP. Because SHOPP is the single largest funding program for improving California's transportation corridors, we set a high standard for what SHOPP needs to become in order to truly deliver a safe, connected and clean transportation system for all Californians. Our comments below particularly emphasize the impact of the Director's Policy on Complete Streets (DP-37) on the projects included in the SHOPP, and areas we see for further progress towards ensuring the State Highway System offers a mobility system that is safe, affordable, and provides multimodal options that will mitigate our climate crisis and provide relief for communities that disproportionately suffer from transportation pollution.

**1. The 2024 SHOPP should prioritize creating truly complete streets that allow for safe travel by all road users, especially people walking, biking and**

**taking transit on the State Highway System as well as crossing barriers created by State Highways.**

We acknowledge that Caltrans is beginning to explicitly incorporate and track complete streets elements in projects in the 2024 SHOPP. This is a good start but further progress is needed to prioritize projects that serve people walking, biking and taking transit in order to move beyond a box-checking process to making transformational investments in the State Highways System at the scale that our traffic safety and climate crises require.

Caltrans has expressed a "commitment to integrating bicycle, pedestrian, and transit improvements on the transportation network" and claimed that "45% of all Draft 2024 SHOPP projects including one or more complete street features."<sup>1</sup> Our analysis finds that 44.6% of 2024 SHOPP projects appear to include one or more ADA, bike, pedestrian, or public transportation element, in line with Caltrans' claim; however, 45% is a decrease from the 47% of projects reported to include complete streets in the 2022 SHOPP. It's shocking to see this number going down, despite all Caltrans districts completing active transportation plans over the last several years that identified a significant increase in complete street asset needs since the 2022 SHOPP.

We also believe that it's not a meaningful statistic to cite the percentage of projects that include *only one* complete street element, particularly when you include minor activities such as drainage grates in counting individual complete streets elements. Describing complete streets investment in this way violates Caltrans own definition of complete streets from DP-37. For example, if we exclude ADA investments from the complete streets investments, because ADA is a legal requirement and doesn't meaningfully create a "complete street," but merely a legally-compliant street component at a single intersection, then the share of SHOPP projects featuring a "complete street" investment beyond simple ADA compliance is 39.4%.

Furthermore, if we specifically filter 2024 SHOPP projects to focus only on complete streets assets that have CTC-established performance targets set in the 2023 State Highway System Management Plan (SHSMP), which include class 1, 2 and 4 bikeways, sidewalks, and crosswalks, only 127 projects (or 21% of all projects) include those more meaningful complete streets elements. 21% represents a much more meaningful tally of projects that create complete streets facilities but is less than half of the 45% of projects that Caltrans is promoting as including a complete streets element.

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The inclusion of complete streets 'elements' in the SHOPP nonetheless clearly falls short of the letter/intent of the Director's Policy for Complete Streets and Road Safety, which respectively commit to, among other things, "... all transportation projects funded or overseen by Caltrans will provide comfortable, convenient, and connected complete streets facilities for people walking, biking, and taking transit or passenger rail unless an exception is documented and approved", and directs all employees/divisions/programs to "...promote the implementation of the Safe System approach as relevant to their roles...". These goals cannot be achieved by individual 'elements' in any given project but require holistic design approaches that cannot be evaluated using available data. The continued increases in pedestrian and overall traffic fatalities strongly suggests an ongoing disconnect between implementation and the impact needed.

**2. The 2024 SHOPP falls well short from implementing the 10 year performance targets for complete streets, transit, and climate adaptation set in the 2023 State Highway System Management Plan. We recommend funds be set aside in the 2024 SHOPP to increase investment in these asset categories equivalent to a 4-year investment required to meet the 10-year targets.**

The 2023 SHSMP plans to spend \$3 billion on bicycle and pedestrian infrastructure in the 10 year period beginning with the 2024 SHOPP. Yet, the 2024 SHOPP only spends \$280 million on bike and pedestrian infrastructure, less than 10% of what we would expect to be 40% (\$1.2B) needed to achieve the 10 year target on time. There is a clear inconsistency between documented complete streets needs identified in Caltrans' plans, planned investment in the SHSMP, and the actual implementation found in the 2024 SHOPP. For example, the total 10-year need for bicycle and pedestrian infrastructure that was identified in Caltrans Active Transportation (CAT) Plans is estimated at \$14.6 billion, plus an additional \$1.1 billion for ADA infrastructure. Further CAT Plan data analysis shows that 4,201 miles (or roughly 22 million linear feet) is needed for these facility types and is documented in the new asset needs in the chart below from the 2023 SHSMP. However, when we examine the 2024 SHOPP project list and disaggregate by facility type, all projects that include bikeway facilities will add only 215 miles of new assets. This contrasts sharply with the 10 year need set in the SHSMP, 2,570 miles, for bikeways of all types. SHOPP 2024 only represents 8% of meeting total 10-year need for bikeways and falls significantly short at its current pace (this discrepancy is even more stark when examining sidewalk and crosswalk needs and 2024 SHOPP implementation). Examining further, we find that the vast majority of the 93 2024 SHOPP projects that will implement a bikeway are class II bikeways. Research has shown that class II facilities are insufficient for an "all ages and abilities" design approach that DP-37 upholds.

**Table 5-63. Bicycle and Pedestrian Infrastructure Inventory by Asset Type**

Inventory by Asset Type		
Asset Type	Existing Assets (linear feet)	New Asset Needs (linear feet)*
<b>Bicycle Infrastructure Assets</b>	<b>2,169,495</b>	<b>13,565,054</b>
Bikeway Class I	596,392	2,058,698
Bikeway Class II	1,549,412	6,795,335
Bikeway Class II Buffered	21,435	2,683,154
Bikeway Class IV	2,256	2,027,867
<b>Pedestrian Infrastructure Assets</b>	<b>6,253,975</b>	<b>7,680,978</b>
Sidewalk	5,414,723	7,450,866
Crosswalk	839,252	244,800
<b>Other Bicycle and Pedestrian Infrastructure Assets</b>	<b>-</b>	<b>922,225</b>
Facilities at Bridges and On/Off Ramps	-	922,225
<b>Total</b>	<b>8,423,470</b>	<b>22,182,946</b>

\*The quantities of new bicycle facility needs by type are estimated for investment planning purposes only.

The 2023 SHSMP also documents \$4.6 billion planned 10-year investment for "climate-focused objectives" and a 10-year climate adaptation and resilience need of \$15.4 billion. It is unclear how the 2024 SHOPP takes these needs into account, since no narrative is included in the RTPA letter related to this category of projects, and the project book does not appear to include this category of activities. We request an analysis of how these SHSMP performance goals are implemented in the 2024 SHOPP, what types of project activities are included, and specifically how "climate adaptation" and "climate change infrastructure protection" is defined.

Lastly, the 2024 SHOPP lists only nine projects that include transit stop improvements, and no other categories of transit priority activities. Transit improvements should be considered alongside bike and pedestrian infrastructure as critical elements of complete streets, based on DP-37, and transit priority investments that move buses more efficiently on the state highway are key to effectively operating the system. These investments should be prioritized for SHOPP projects on all state highways with major transit routes in order to claim that the 2024 SHOPP is consistent with CAPTI, however these investments are severely lacking in the 2024 SHOPP.

**3. The 2024 SHOPP should explicitly consider and prioritize beneficial investments in communities that are most burdened by the transportation**

**system and most in need of investment in safe, clean and affordable mobility options.**

Our analysis finds that SHOPP's complete streets and pavement rehab project portfolios (by dollar amount) are underinvested in disadvantaged communities (DACs) when considering the draft Caltrans EQI and CalEnviroScreen 4.0 (bottom quartile) DAC definitions, and roughly proportional (i.e., geographically even but still inequitable) according to the federal J40 DAC definition. Overall SHOPP investments are underinvested in DACs according to the draft Caltrans EQI definition, and roughly proportional to the CalEnviroScreen 4.0 and federal J40 definitions. NRDC-identified projects with potential VMT-increasing impacts (9% of proposed SHOPP projects and 12% of total SHOPP spending) do not appear to be distributed inequitably in proportion to those investments, though some are sited in DACs.

The below table shows that only 47% of the 2024 SHOPP's complete streets investments are being made in communities that Caltrans has flagged as equity priorities in its Transportation Equity Index EQI, compared to 67% of the population living in those communities. Using Justice 40 criteria, Caltrans allocated 32% of 2024 SHOPP projects with complete streets elements to J40 communities, whereas 36% of Californians live in J40 communities. And only 19% of 2024 SHOPP projects with complete streets elements are in communities in the bottom quartile of the CalEnviroScreen, whereas 29% of Californians live in such communities.

Percent of dollars spent						
Equity community designation	% of \$ SHOPP road widening investments in DACs	% of \$ SHOPP pavement investment in DACs	% of \$ SHOPP complete street investment in DACs	% of \$ SHOPP bike & ped elements (non ADA) in DACs	% of \$ SHOPP overall investment in DACs	Percent of total CA population living in DAC geos
EQI Caltrans	39%	44%	47%	42%	52%	67%
J40	33%	35%	32%	30%	40%	36%
CalEnviroScreen (bottom 1/4)	15%	16%	19%	17%	27%	29%

**4. The 2024 SHOPP includes funding for projects that are receiving funds for highway, major roadway, and interchange expansions through other funding streams. These projects should be removed from the 2024 SHOPP and this practice should be ended.**

Our organizations have noted that the 2024 SHOPP includes rehabilitative projects along State Route 99 in Madera and Kern counties, which are also receiving funding for expansions as part of the same projects. In Madera County, SHOPP project ID 22897, described in the workbook as a pavement rehabilitation project along State Route 99 from Avenue 7 to Avenue 12, is part of a larger project to expand SR-99 from 4 to 6 lanes.<sup>2</sup> In Kern County, SHOPP project ID 19345, described in the workbook as a rehabilitation project, is part of a larger project to expand SR-99 by adding an auxiliary lane.<sup>3</sup>

These expansion projects will increase greenhouse gas (GHG) emissions and vehicle miles traveled (VMT), undermining California's climate and equity goals. It is not an appropriate use of SHOPP funds to further enable highway widenings that are done in a piecemeal fashion with lack of transparency to the public about the overall impact of the cumulative investments through SHOPP and other funding streams.

**5. There remains a disconnect between implementation of the Director's Policy on Complete Streets and continuing rising traffic fatalities.**

From 2013 to 2022, traffic fatalities in California increased from 2,853 to 4,166, a 46% increase representing nearly 35,000 lives lost in that decade. Over 10,000 of these deaths were Californians who were walking or biking. In addition to requiring that complete streets elements be included in projects, California could take inspiration from the federal Highway Safety Improvement Program in the Infrastructure Investment and Jobs Act by requiring a proportional share of SHOPP funding be focused on countermeasures that will prevent traffic fatalities of people walking and biking. SHOPP investment in complete streets projects that protect vulnerable road users should continue to ramp up in response to the rising traffic fatalities.

**6. Caltrans must consistently and transparently document exemptions granted to projects under the Director's Policy on Complete Streets.**

Our analysis finds that 346 SHOPP projects (57%) have no ADA, bike, pedestrian, or public transit elements listed, and an even greater 79% do not include the key complete streets assets identified in the 2023 SHSMP (bikeways, sidewalks, or crosswalks). That would indicate a vast majority of projects claim

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<sup>2</sup> <https://dot.ca.gov/caltrans-near-me/district-6/district-6-projects/06-0h220>

<sup>3</sup> <https://dot.ca.gov/caltrans-near-me/district-6/district-6-projects/06-0x370>

exemptions to DP-37. To what extent have these exemptions been documented in the 2024 SHOPP program, and are all districts consistently and meaningfully including complete streets assets or approving exemptions? Caltrans should publish the required documentation for these exemptions on the agency website so stakeholders can identify what Caltrans is approving as reasons for not including complete streets elements, and how exemptions compare across districts. A list of projects receiving exemptions should be reported to the California Transportation Commission as part of their briefing materials during each meeting.

**7. Caltrans should provide more opportunities for public input into project priorities, and track and evaluate implementation of the Complete Streets policy.**

Caltrans should create a clear and welcoming process for the public to identify complete streets projects they would like to see on the State Highway System, and create a process for that input to be reflected in each draft SHOPP. Caltrans should ensure every Caltrans District has an identified complete streets coordinator that is engaged in reviewing projects included in the SHOPP. Districts should have reporting obligations for ensuring progress toward implementing the agency's complete streets policy, that includes information on which projects received exemptions.

We thank you for your support for complete streets investments and are eager to work with you and Caltrans to fully achieve the Director's Order, and reach further to build out the transportation system of the future that Californians deserve.

Best,

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NRDC (Natural Resources Defense Council)

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