



Aug 18, 2025

Deputy Director Marlon Flournoy
California Department of Transportation (Caltrans)
1120 N Street
Sacramento, CA 95814

Re: Comments on Draft Director's Policy on Transit

Dear Deputy Director Flournoy,

The undersigned organizations are members of the ClimatePlan Network and write in strong support of Caltrans's efforts to improve the convenience, frequency, and quality of public transit in California. We recognize that as the state department of transportation Caltrans serves in multiple critical roles to support public transit operators; the statewide transportation planning agency, owner and operator of the state highway system carrying transit on and across state right-of-way, as well as administrator of significant state and federal transit funds. In these roles, we encourage Caltrans to move swiftly to adopt a strong and clear directive to all department

employees in the Director's Policy on Transit and focus on expediting implementation of transit priority plans and projects on the state highway system (SHS).

We want to emphasize the urgency of this work to prioritize transit as transit operators around the state struggle to maintain and improve service in the wake of ridership losses since the pandemic, and as the state experiences first-hand the worsening effects from climate change. Recent state policies including Senate Bill 960 (Wiener, 2024), the Transit Transformation Task Force established under SB 125, and the Climate Action Plan for Transportation Infrastructure (CAPTI) call for increased investment and streamlined delivery for transit priority projects as a means to improve transit service, grow ridership, address equity, mitigate climate change, and improve cost effectiveness of transit operations. With these policy mandates and the gravity of the challenges facing transit in mind, **we urge Caltrans to expedite adoption of both a Director's policy on transit as well as an implementation action plan for the policy by the SB 960 deadline of January 1, 2026.**

In addition to expediting policy and implementation plan adoption, we offer the following specific comments and amendments regarding the language in the transit policy:

1. We are concerned that this policy is no longer called a transit priority policy. SB 960 expressly called for Caltrans to develop a transit policy to guide implementation of transit priority facilities on the state highway system (SHS) that would prioritize the movement of transit vehicles (buses) on roadways over single-occupant vehicles. The current draft policy loses that emphasis on prioritizing transit reliability and speed on the state highway system, even though Caltrans bus delay data¹ demonstrates long delays for buses traveling on or across the SHS. Please revisit the draft policy so that it fully complies with SB960.
2. Other than including a definition of disadvantaged community, the draft policy does not include any mention of prioritizing the needs of disadvantaged or lower-income communities in the planning or delivery of transit priority projects, or individuals such as older adults, students, or people with disabilities who may be transit reliant. The policy also lacks any identification of responsibility at the district level or headquarters to engage communities in transit planning and project development.
3. We do not support giving Caltrans the responsibility of establishing "targets for transit that strengthen Caltrans' ability to evaluate and measure the performance of transit projects" (page 1 of the draft policy). This is significant overreach in the agency's mission mandate and is inconsistent with SB960. It is also duplicative of efforts underway in other state departments and at MPOs and RTPAs. Instead, Caltrans should focus on adopting targets and performance measures for the operation of the state highway system so that the state highway system supports safe, reliable, and fast transit service. Please amend this language to direct Caltrans to "Adopt targets and performance measures for the operation of the state highway system to assist Caltrans' in the

¹ [Cal-ITP Data Analyses Portfolio](#)

identification and prioritization of transit-supportive infrastructure on the SHS to improve transit service”.

Ensuring that the state highway system enables high-quality transit service is a distinct, necessary, and appropriate role for Caltrans. To do this, Caltrans should develop performance measures for unacceptable levels of intersection delay and other indicators of congestion because these types of delays degrade transit performance on the state highway system. This would help the districts and transit agencies identify places where transit priority investments are necessary on the state highway system.

4. The draft policy implies that transit priority projects cannot move forward until needs are identified in transit plans. We request that the timeline for finishing these plans in all districts be adopted in the implementation plan. If the bus speed maps that Caltrans has published² and already-identified priorities of a transit operator indicate the need for a transit priority project on or across the SHS now, we urge districts to move forward to work with transit operators and implement projects as soon as possible.
5. Please list “Establish an internal process to expediently review and resolve encroachment permit applications for transit-supportive infrastructure on the SHS” as a critical action required for the implementation of the policy. Please also amend the action to require that the review and resolution take place within 60 days of receiving an application in compliance with SB960. The intended result associated with this critical action is “Support the timely and cost-effective delivery of transit priority projects sponsored by local jurisdictions”.

Thank you for considering these comments and for advancing this policy in support of public transit movement on the State Highway System. If you have any questions about these comments please contact Jeanie Ward-Waller with ClimatePlan at jeanie@fearlessadvocacy.com .

Sincerely,

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² [Cal-ITP Data Analyses Portfolio](#)

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