



September 15, 2014

California Transportation Commission
Executive Director Andre Boutros
Chair Carl Guardino
1120 N Street, Room 2221 (MS-52)
Sacramento, CA 95814

RE: Update to 2016 STIP Guidelines

Honorable Commissioners, Executive Director, and staff:

We—the undersigned group of both local and national organizations who support more livable communities with healthier, more equitable, and sustainable transportation options—appreciate the opportunity to provide input on the update to the 2016 State Transportation Improvement Program (STIP) Guidelines both during the public workshops and in writing.

It is an exciting time in the evolution of transportation in California. Many factors—including the release of the *2014 State Smart Transportation Initiative* report and the new mission statement of the California Department of Transportation (Caltrans)—are adding to the momentum behind a meaningful shift towards creating a healthier, more equitable, sustainable California.

The update to the STIP Guidelines gives the California Transportation Commission (CTC) the opportunity to contribute to this progress. The STIP is constrained and only one transportation funding source among many. Although Section 8116, Title 21 of The California Code of Regulations establishes that the CTC has authority to “deviate” from the package of projects in an RTIP for various reasons, including an “overriding state interest,” the CTC practices limited discretion over individual projects. The current update can increase the CTC’s accountability, as well as the transparency of the CTC’s decisions regarding the STIP’s funding distribution and how the allocation of state funds is contributing to state goals. The STIP guidelines should be updated to help answer the question: ***“What is this RTIP¹/ITIP² going to do for California?”***

This process of updating the guidelines can serve as an example for re-focusing other state funding sources on state goals.

¹ Regional Transportation Improvement Program (RTIP)

² Interregional Transportation Improvement Program (ITIP)



Below, we offer our recommendations:

- **Outline a clear policy objective for STIP investments based on state goals**

The update of the STIP guidelines should include clear policy statements re-establishing that allocation of state transportation funding should forward state goals, not only support region and interregional priorities. While regions and Caltrans have their own respective goals, they too should uphold statewide mandates with any state transportation funds they employ. The *California Transportation Plan 2040* (CTP), currently being drafted, will define the state transportation goals. The STIP guidelines update should be coordinated with the CTP drafting process. The Plan is based on a thorough public review process, input from an advisory committee, state planning documents, scientific reports, and legislation (including AB 857, SB 375, SB 743, SB 535, SB 391 and AB 32.)

- **Replace current STIP Guidelines performance measures with measures aligned with State goals**

Performance measures provide an opportunity to increase transparency of 1) how CTC decides which proposed projects in RTIPs and the ITIP are prioritized, and 2) how allocation of state funds is contributing to state goals.

The SSTI report reaffirms this need for change and provides guidance for better performance measures: “Performance measures must reflect the mobility, livability, and climate goals set out in legislation such as SB 375, AB 857 (state planning priorities), and SB 743 (alternatives to LOS in CEQA), as well as in *Smart Mobility 2010* and other Caltrans policy documents. Performance measures not aligned with state goals— those concerned too exclusively with minimizing traffic congestion—would provide a script for failure in re-positioning the department as a vital and trusted player in building the California of the future.”ⁱ

Currently, the STIP Guidelines performance measures over-emphasize automobile through-put. The passage of SB 743 affirms the need to redirect the state’s focus away from through-put: “It is the intent of the Legislature to...More appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions.”ⁱⁱ

In order to measure “what an RTIP/ITIP is going to do for California?” the CTC should replace the current STIP Guidelines Performance Indicators, Measures and Definitions with performance measures that address current state transportation goals, for example those outlined in the *CTP 2040*. The STIP Guidelines, Section 19 criteria for measuring performance of RTIPs and the ITIP should address the following:

- Effect on public health?
- Accessibility to transit?



- Mode share of walking, biking, and transit?
 - Effect on safety for pedestrians, bicyclists, motorists, and transit users?
 - Transportation costs for residents?
 - Impact on disadvantaged communities?
 - Greenhouse gas emissions?
 - Conservation of agricultural lands and natural resources?
- **Ensure that new performance measures are meaningful by keeping them limited in number and providing instruction on how they should be applied**

We recommend that the current STIP Guidelines Performance Indicators be replaced by key performance measures from the draft *CTP 2040*. To make the performance measures as meaningful as possible, we recommend simplifying the list of 34 performance measure in the *CTP 2040* down to about 10 measures (see the attached Appendix.) For example, the following measures, when taken together, address the concerns outlined above:

- VMT per capita
- Mode share travel to work
- Non work mode share
- Bike and walk miles traveled
- Transit accessibility: Housing/jobs with 0.5 miles of stop
- Fatalities/serious injuries per capita per mode
- Housing/transportation affordability index
- Equitable distribution of impacts
- Equitable distribution of access and mobility
- Acres of agricultural land, habitat, and watersheds changed to urban use

The CTC should provide instruction and methods for each performance measure to ensure standardization across regions and Caltrans. The measures above are further explained with recommended methods in their source documents: *Statewide Performance Monitoring Indicators for Transportation Planning Final Report* and the *Smart Mobility 2010 A Call to Action for the New Decade*.

The performance measures in the *Statewide Performance Monitoring Indicators for Transportation Planning Final Report* are also a good resource for updating the current measures. However, the measures from the *Statewide Performance Monitoring Indicators for Transportation Planning Final Report* lack consideration of equity and active transportation concerns; therefore, these measures alone are inadequate.

- **Update the cost/benefit analysis to reflect the benefits identified by the new performance measures**



The existing Caltrans cost/benefit analysis is based on automobile through-put, which SB 743 affirms is an outdated understanding of the benefit of transportation investments. The cost/benefit analysis for STIP projects should measure the benefits defined by the performance measures above, including safety across all modes of travel. The update to the STIP Guidelines requirements for cost/benefit analysis should be coordinated with the development of the Active Transportation Program's cost/benefit analysis.

- **Measure performance of individual projects**

Each region and Caltrans should demonstrate the performance of each project as well as the whole package of projects for which they request state funds. STIP Guidelines Appendix B Part C should be revised to require assessment of each project proposed for state funding. Restricting project-level assessment to mega-projects with costs above a certain threshold misses the opportunity to capture the performance and cost/benefit of smaller and innovative projects and gives a false impression that larger projects are of greater value. At a minimum, the 2016 STIP Guidelines should include language to indicate that in future STIP cycles the Commission will require performance assessment of all projects based on the key metrics outlined above.

- **Require identification of projects in the RTIPs and ITIP that may not be consistent with regional goals**

Metropolitan planning organizations (MPOs), Regional Transportation Planning Agencies (RTPAs), and Caltrans should be required to identify older projects in their RTIP or ITIP that are subject to Section 4 (K) of SB 375 (2008). These projects may be inconsistent with current regional and state goals, and therefore deserve the public's further attention. Simple identification will increase transparency. In addition, regions that are not subject to SB 375 or do not plan to meet their regional greenhouse gas emission target should not hamper the state's ability to achieve overall greenhouse gas reductions or to meet identified multimodal strategies as outlined in SB 391.

- **Require post-project reporting for all STIP projects to ensure projects meet goals as planned**

The current STIP Guidelines require projected performance measurement of projects programmed in the RTIP or ITIP, but do not require post-project performance reporting other than timely use of project funds. The RTPAs, Caltrans, and the Commission are therefore only accountable to spending STIP funds, but are not held accountable to whether funded projects achieve any of the benefits estimated in the RTIP or ITIP. The update of the STIP Guidelines should require RTPAs and Caltrans to measure and report on the actual performance of the project toward achieving all benefits outlined in the RTIP or ITIP after project close-out, in addition to timely use of funds.

- **Improve transparency in the RTIP and ITIP review process**

The CTC, the California State Transportation Agency, and Caltrans must improve communication with the public on the benefits the transportation system is providing to communities and clearly



demonstrate accountability in improving service to the public. The Commission should be a primary venue for public engagement, yet the current process lacks clarity and accessibility to transportation stakeholders, let alone to the average public citizen. We ask that the Commission update its public participation process to make it transparent and accessible for all communities, so plans and investments accurately reflect the public will.

We support the concept of the RTIP template in development by the Regional Transportation Agency working group, which will standardize the format and project information provided in RTIPs. We look forward to the opportunity to provide comments on the RTIP template to ensure it is clear and understandable for members of the public and addresses the benefits outlined in the sections above. The Commission should post all RTIPs on the Commission's website after they are submitted and allow adequate time for public review before the STIP hearings.

Thank you for the opportunity to offer our recommendations. We look forward to transparent and productive collaboration moving forward.

Sincerely,

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TransForm

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APPENDIX: Draft CTP 2040 “Goals” and “Performance Measures, Indicators, and Definitions”

Recommended performance measures for 2016 STIP Guidelines in bold

STATE GOAL	PERFORMANCE MEASURE
Improve multi-modal mobility and accessibility for all people	VMT per capita*
	% of congested freeway/highway VMT*
	Mode share travel to work*
	Congested arterial VMT**
	Bike and walk miles traveled**
	Non work mode share**
	Freeway/highway travel time reliability: FHWA buffer index
	Transit /Rail travel time reliability**
	Transit Accessibility: Housing/jobs within 0.5 miles of stop*
	Travel time to jobs (mean travel time to work)*
	CO2 reduction per capita*
	Multimodal travel mobility^
	Multimodal travel reliability^
Multimodal service quality^	
Preserve the multimodal transportation system	% of distressed lane miles highway*
	% of distressed lane miles local roads*
	% of highway bridge lane miles in need of rehab/replacement*
	% of transit assets that have surpassed FTA useful life period*
	3-part screening for sea level rise: Is the project located on the coast or in an area vulnerable to SLR? Will the project be impacted by the stated SLR? Is the design life of the project beyond year 2030?
Support a vibrant economy	Travel time to jobs (mean travel time to work)*
	Congestion effects on productivity^
	Efficient use of system resources^
	Network performance optimization^
	Return on investment^
Improve public	Improve transportation infrastructure financing
Improve public	Fatalities/serious injuries per capita*



safety and security	Fatalities/serious injuries per VMT*
	Design and speed suitability^
	3-part screening for sea level rise: Is the project located on the coast or in an area vulnerable to SLR? Will the project be impacted by the stated SLR? Is the design life of the project beyond year 2030?
	Support for sustainable growth--consistency with SCS
Foster livable and healthy communities and promote social equity	Bike and walk miles traveled*
	Transit accessibility: Housing/jobs within 0.5 miles of stop*
	Residential and employment densities (new growth) by EJ and non EJ areas**
	Housing/transportation affordability index**
	Acres of agricultural land, habitat, and watersheds changed to urban use *
	Support for sustainable growth^--consistency with SCS
	Equitable distribution of impacts^
Equitable distribution of access and mobility^	
Practice environmental stewardship	Acres of agricultural land, habitat, and watersheds changed to urban use*
	CO2 reduction per capita*

* PMs identified in the *Statewide Performance Monitoring Indicators for Transportation Planning Final Report*

** PMs identified in the *Statewide Performance Monitoring Indicators for Transportation Planning Final Report* for future consideration

^ PMs identified in the *Smart Mobility 2010 A Call to Action for the New Decade*

ⁱ State Smart Transportation Initiative. *The California Department of Transportation: SSTI Assessment and Recommendations*. January 2014. Page 58.

ⁱⁱ State Bill 743 Section 1(b)(2)