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VIA E-MAIL

Re: Recommendations for the 2015 Interregional Transportation Strategic Plan (ITSP) Update

Dear Ms. Frost:

On behalf of the undersigned organizations, we commend and applaud Caltrans' hard work to update the Interregional Transportation Strategic Plan (ITSP) for the first time since the State of California has clearly articulated its vision for more sustainable and equitable communities through AB 32, SB 375 and SB 391. We are particularly grateful for the thoughtful and intentional alignment of the ITSP with the draft California Transportation Plan 2040 (CTP 2040) and its performance metrics, as well as the Department's updated Mission, Vision, and Goals.

While the Draft Vision and Objectives for the 2015 ITSP is a major step forward, we offer the following recommendations to further strengthen the ITSP's alignment with the draft CTP 2040 and the Department's new Mission and Goals:

Fully Integrate Active Transportation, Multimodality, Sustainability, & Equity into the ITSP Vision & Objectives

As currently written, the draft ITSP Vision seemingly precludes investments other than those on the "interregional State Highway [System] and Intercity Passenger Rail network."¹ In doing so, the critical multimodal connections to a backbone interregional network are shortsightedly neglected. As part of the Department's new Mission, the ITSP needs to advance an **integrated, multimodal** transportation system in California through the interregional network, not act as a barrier to local and regional walking, biking, and transit networks.

¹ Caltrans, *Draft Interregional Strategic Plan, Vision and Goals Comparison*, Available at http://www.caltrans-itstp2015.org/files/managed/Document/49/2A-Draft_ITSP_Vision-Goals_Comparison.pdf

Moreover, we have great concern that the draft ITSP Vision lacks references to sustainability embedded within the draft CTP 2040, the Department’s new Mission, and existing State legislation. SB 375 and SB 391 make clear the State goal to reduce vehicle miles traveled (VMT) through improved land use and transportation policy. Accordingly, each major region of the state has spent tremendous effort to improve policies to reduce VMT. Interregional travel is inextricably connected with regional travel—vehicles traveling interregionally start and end their trips within regions and many state highways act as local main streets. Further, the ITSP Vision should commit to minimizing impacts of the plan and projects on the State’s natural resources and agricultural lands, and contribute to conserving those important resources through strategies such as Regional Advance Mitigation Planning. **An interregional travel plan that encourages vehicle travel and focuses on highway widening will directly undermine the regions' hard work and the achievement of State planning priorities, policies and goals.**

We believe it is **important for the ITSP to promote social equity**. Although equity is included in the draft ITSP Objectives under “Sustainability”, we recommend adding more specific language that addresses the importance of equity as the ITSP is developed. For example, in the draft CTP 2040, one of the performance metrics is “Equitable distribution of impacts, mobility, and accessibility.” While some highway and road projects may seem beneficial to a community, a review based on equity can highlight some of the negative issues resulting from road projects. We recommend that the ITSP consider the equitable distribution of a project’s positive impacts, such as increased accessibility, and the distribution of negative impacts, such as air pollution. Also, **the ITSP should provide recommendations that ensure interregional projects mitigate barriers for disadvantaged communities**, potentially addressing negative health impacts, displacement, and other negative consequences.

We strongly recommend that the ITSP Vision be revised as follows: “A well developed, high quality, **integrated, and multimodal** interregional ~~State Highway and Intercity Passenger Rail~~ **transportation** network serving as the backbone for the movement of people and goods throughout California **in an environmental, economical, and equitable manner.**” We also recommend that these themes are carried throughout the ITSP Objectives and offer the following suggested language:

- **Accessibility:** “Provide **integrated and multimodal** access for people and goods to and through all regions of California.”
- **Reliability:** “Ensure that the **multimodal** interregional transportation network is reliable and efficient for the movement of people, goods, services, and for emergency response.”
- **Economy:** “Improve **multimodal** interregional connectivity to enhance California’s diverse economy”

- **Sustainability:** “Improve and manage California’s **multimodal** interregional transportation network in an environmental, economical, and equitable manner.”
- **Safety:** Develop and operate a safe **multimodal** interregional transportation network for all travelers.
- **Integration:** “Optimize multi-modal connectivity **and mitigate barriers** throughout the interregional transportation network.”
- Add New Objectives:
 - **Livability: Improve multimodal interregional connectivity, while preserving community character and mitigating health and safety barriers resulting from the multimodal interregional system.**
 - **Social Equity: Ensure that the interregional transportation network equitably distributes positive impacts on mobility and accessibility and minimizes the localized negative impacts on health, safety, and the environment**
 - **Stewardship: Ensure that the multimodal interregional transportation network minimizes impacts on and contributes positively to conserving the State’s natural resources and agricultural lands and focuses efforts on system preservation of the multimodal interregional transportation network.**

Prioritize Investments in Interregional Rail Over Highway Widening & Expansion

While we understand that the Interregional Transportation Improvement Program (ITIP) is, in the grand scheme of things, a small amount of funding, we believe it is important for **ALL** State investments to align with the State’s sustainability goals outlined in AB 32. Furthermore, State investment priorities set the tone for the regions, and we are ready to assist the State to become the undisputed leader in sustainable transportation. To that end, we **strongly recommend that the ITSP establish a policy objective to prioritize investments in interregional rail**, including high-speed rail, over highway widening and expansion projects. It is critical for the State to fund an interregional transportation network that gets people to where they need to go in a reliable, fast, safe and healthy way **AND** also reduces greenhouse gas emissions. Establishing a clear funding target and policy goal for interregional rail better reflects the Department’s new Mission and the draft CTP 2040, as well as better supports the State’s sustainability goals and achievement of SB 391 and SB 375.

Advance Multimodal & Livable Corridors to Mitigate Barriers & Impacts to Health, Active Transportation, & Conservation

We applaud the Integration Objective and the incorporation of “multimodal corridors” into the 2015 ITSP. However, the livability, social equity, and conservation goals of the draft CTP 2040 should also be integrated into this corridor concept. By creating multimodal **AND** livable corridors, the **interregional system can improve the interregional transportation network,**

while also intentionally minimizing health and safety burdens on the communities through which it passes. For example, one integrated strategy could be to preserve open space next to the travel corridors to provide for parallel active transportation routes, green and open space for recreation and wildlife connectivity, and to act as a buffer to minimize impacts of air pollution on neighboring residents.

For active transportation in particular, since most walking and biking trips are short in length, the multimodal and livable corridor concept should consider how these corridors interact and integrate with existing local street and road networks where these active transportation trips occur. Historically, the State Highway System's interregional network has imposed significant barriers to those traveling on foot or by bicycle—with underpasses or overpasses that are simply inconvenient, uncomfortable, and that feel unsafe to many users. To help the State fulfill its sustainability objectives and policy direction to shift short-distance auto trips to more active transportation trips, **the ITSP should outline how a multimodal corridor integrates walking, biking, and transit not only along the corridor itself but also where the corridor interacts with local streets and roads.** At a minimum, the ITSP should point local Caltrans District staff to resources for addressing these barriers; for example, the State's Health in All Policies Task Force will soon be releasing California-specific guidance on Crime Prevention through Environmental Design (CPTED) strategies that could inform how staff can mitigate these barriers.

Ensure Performance Measures Drive Project Selection

We strongly recommend that Caltrans a) establish a concise list of performance metrics based on the new objectives, and b) select projects according to performance. Performance metrics are necessary for transparency, data-driven decision-making, and alignment of the ITSP with its new vision and objectives. Both the draft CTP 2040 and the draft 2016 STIP Guidelines include performance metrics that address issues aligned with the draft ITSP objectives, such as climate projection, accessibility, multimodal transportation options, safety of all travelers, and natural resource protection. These metrics, as well as metrics that assess equity concerns and public health, should be included and used in the ITSP.

Commit to Transparency in the ITIP Review Process

In the past, the approval of the ITIP has lacked an adequate public review period for stakeholders to truly engage and evaluate the proposed ITIP projects. We believe that it is critical for the ITSP to commit to transparency in the public review of ITIP projects in order to ensure that these projects are advancing the ITSP's vision and goals. We **recommend that the ITSP commit the Department to conduct public workshops at convenient times and locations for community members and stakeholders to learn about proposed ITIP projects, their benefits, impacts, and costs BEFORE the projects are proposed for consideration in the ITIP.**

This added layer of public review will help ensure investments accurately reflect the public will, as well as help to clearly demonstrate the Department's accountability in improving service to the public. We also **recommend that the California Transportation Commission update its public participation process** to make it transparent and accessible for all communities, with the proposed ITIP projects posted on the Commission's website well in advance of STIP hearings to allow adequate time for public review.

Thank you for the opportunity to comment on the Interregional Transportation Strategic Plan (ITSP), which helps meet the transportation needs of millions of Californians.

Sincerely,

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