

June 8, 2015

Scott Sauer, ITSP Update Project Lead  
Caltrans  
Office of Multimodal System Planning  
Division of Transportation Planning  
Sacramento, CA 94274  
Email: scott.sauer@dot.ca.gov  
hq.system.planning@dot.ca.gov

**VIA EMAIL**

**RE: Recommendations for the Draft 2015 Interregional Transportation Strategic Plan (ITSP)**

Dear Mr. Sauer,

First, we thank you for the opportunity to comment on the draft Interregional Transportation Strategic Plan (ITSP). The draft ITSP communicates the vision for California's interregional transportation system and provides the framework to guide investment for the ITIP. With the passage of AB 32, SB 375, SB 391 and the Governor's Executive Order B-30-15, it is critical that the ITSP reflects California's new direction towards sustainability. We, the undersigned organizations, resubmit our comments from December 2014 which were aimed at aligning the ITSP's Vision, Objectives, and Goals with the state's sustainability, livability, and equity goals. In our previous comments, we made the following recommendations:

- Fully Integrate Active Transportation, Multimodality, Sustainability, & Equity into the ITSP Vision & Objectives;
- Prioritize investments in interregional rail;
- Advance Multimodal & Livable Corridors to Mitigate Barriers & Impacts to Health, Active Transportation, & Conservation;
- Ensure Performance Measures Drive Project Selection; and
- Commit to Transparency in the ITIP Review Process.

Unfortunately, the draft ITSP did not meaningfully address our previous recommendations and concerns. We offer the following additional recommendations to strengthen the draft ITSP to ensure alignment with the state's sustainability, livability, and equity goals:

**Integrate Greenhouse Gas (GHG) Emission Reductions, Public Health & Equity into Project Evaluation Criteria**

As outlined in the draft California Transportation Plan 2040 (CTP), the state's aggressive 2020--and now 2030 and 2050--GHG emission reduction targets will require an extensive suite of strategies to meet those goals. However, the draft ITSP project evaluation criteria do not explicitly address how a project's impact on GHG emissions will be evaluated and factored into the decision-making process. In light of state climate change goals, **we recommend that one of--if not the primary--evaluation criteria should be the GHG impact.** Moreover, the **ITSP should provide an analysis of how interregional travel contributes to the state's GHG**

**emissions** and identify strategies for how the interregional system can play its part in reducing GHG emissions. This is a particularly critical role for the ITSP, as the Regional Transportation Plans/Sustainable Communities Strategies did not all account for interregional trips and contributions to GHG emissions, let alone in a standardized manner.

Additionally, though the draft ITSP incorporates equity as part of its sustainability objective, there is an utter lack of discussion of equity in any part of the plan or in the evaluation criteria. To meet the draft ITSP's sustainability objective and to be in alignment with other state equity goals (e.g., SB 535), we **recommend that interregional projects be evaluated using public health and social equity metrics**. Public health metrics should include measures such as the air quality impacts (e.g., PM 2.5 and NOx levels) on communities along interregional corridors. Social equity metrics should evaluate how interregional projects provide benefits--and identify and prioritize specific targets for providing meaningful mobility and safety benefits--to communities along interregional corridors that are low-income, historically underserved or negatively burdened by environmental health factors.

### **Highway Capacity Expansion Priorities At Odds with State Climate Goals**

It is disappointing to see the State continue to prioritize ITIP investments in highway expansion, which adds burden to the state's maintenance backlog; directly contradicts the state's climate goals inducing greenfield growth and vehicle miles traveled, as research has clearly demonstrated; and decreases safety for motor vehicle drivers and other travelers alike.

While freight movement needs to be accommodated on the interregional system, capacity expansion projects are not the best approach or priority in light of state climate change goals. Additionally, **capacity expansions of the interregional system for freight purposes must take into account how the interregional system is also used for local/regional trips**. The draft ITSP even demonstrates that many interregional corridors experience heavy automobile traffic for commute purposes (e.g., the I-80 between San Francisco Bay Area and Sacramento; I-15 between San Diego and Victorville; I-580 between San Rafael and Dublin). Given the heavy local/regional non-freight uses of the interregional system, it is **imperative to evaluate the potential of induced demand of local/regional trips on the interregional system** that may result from interregional capacity expansion proposals.

Moreover, the **highway capacity expansion should not be the default strategy for addressing freight capacity** issues. The draft CTP even identifies other non-expansion strategies for addressing freight capacity issues that would not induce additional private local/regional auto traffic on the interregional system (draft CTP 2040, pg. 123); for example, one strategy could involve establishing dedicated truck lanes from existing general purpose lanes and another could prioritize short-term investments in "capitalized rail maintenance projects in shared use intercity passenger rail corridors that preserve freight capacity and maintain on-time passenger time performance."

While most freight corridor expansion priorities are identified as medium priority and long-term, we are particularly troubled by several corridor expansion projects that are high priority and

short-term, including: San Jose/San Francisco Bay Area-Central Valley-Los Angeles Corridor (I-5 and SR-99 expansions) and Central Coast-San Joaquin Valley Corridor (SR-46 and SR-156 expansions).

### **Prioritize Investments for Non-Automobile Interregional Options**

We **strongly support the draft ITSP's categorizing most interregional rail options as high priority and short-term**. The draft ITSP states that "each corridor concept addresses all of the interregional needs regardless of funding source" (pg. 54); however, several corridors lack non-automobile options for interregional travel--most notably, the San Jose/San Francisco Bay Area-North Coast and Sacramento Valley-Oregon Corridors. While interregional rail, high-speed rail, and/or enhanced Amtrak Thruway bus service may not be achievable in the short-term for these corridors, **non-automobile options should be evaluated and included in the ALL strategic interregional corridor concepts** in order to help state climate change goals that will require a substantial mode shift to non-automobile modes and reductions in VMT per capita. **Changing policies to Amtrak Thruway bus services or investing in separate interregional bus service should be considered for all strategic interregional corridors** in addition to rail, and **short-term priorities should be identified to advance this approach** (e.g., increasing frequency of Amtrak Thruway bus services).

### **Multimodal Local Connections to Interregional System Unaddressed**

We commend the draft ITSP for articulating the need to develop a fully integrated system, a "system [that] must be developed as whole" (pg. 33). Accordingly, we **strongly recommend that the ITSP to evaluate and address impacts of the interregional system on the local system**. For example, the proposed capacity expansion projects create greater barriers and crossing challenges for communities that lie along the interregional corridor, particularly for vulnerable users who do not own cars and are reliant on walking and biking along dangerous interregional roadways for local and regional trips.

We are excited to partner with you to ensure this document advances California's sustainability goals. If you would like to discuss any of these recommendations, please contact Tony Dang of California Walks at [tony@californiawalks.org](mailto:tony@californiawalks.org). Thank you again for the opportunity to provide comments on the draft ITSP.

Sincerely,

Jeanie Ward Waller, Policy Director  
California Bicycle Coalition

Sarah de Guia, Executive Director  
California Pan-Ethnic Health Network

Wendy Alfsen, Executive Director  
California Walks

Linda Rudolph, MD, Director  
Center for Climate Change and Health

Ben Winig, Senior Staff Attorney & Program Director  
ChangeLab Solutions

Eva Inbar, Director  
Coalition for Sustainable Transportation (COAST),  
Santa Barbara

Matt Vander Sluis, Program Director  
Greenbelt Alliance

Deborah Murphy, Executive Director  
Los Angeles Walks

Denny Zane, Executive Director  
Move LA

Amanda Eaken, Deputy Director, Urban Solutions  
Natural Resources Defense Council

Judith Bell, President  
PolicyLink

Emily Sinkhorn, Deputy Director  
Redwood Community Action Agency

Marty Martinez, Bay Area Policy Manager  
Safe Routes to School National Partnership

Stuart Cohen, Executive Director  
TransForm

Steve Gerhardt, AICP, Program Manager  
Walk Long Beach

Chris Hwang, Board President  
Walk Oakland Bike Oakland

Nicole Ferrara, Executive Director  
Walk San Francisco

Carl Anthony and Paloma Pavel, PhD  
Co-Founders, Breakthrough Communities

CC:

Brian Kelly, Secretary, California Transportation Agency, [Brian.Kelly@calsta.ca.gov](mailto:Brian.Kelly@calsta.ca.gov)

Brian Annis, Undersecretary, California Transportation Agency, [Brian.Annis@calsta.ca.gov](mailto:Brian.Annis@calsta.ca.gov)

Kate White, Deputy Secretary for Environmental & Housing Policy Coordination, California Transportation Agency, [Kate.White@calsta.ca.gov](mailto:Kate.White@calsta.ca.gov)

Malcolm Dougherty, Director, Caltrans, [Malcolm\\_Dougherty@dot.ca.gov](mailto:Malcolm_Dougherty@dot.ca.gov)

Steve Cliff, Assistant Director for Sustainability, Caltrans, [Steven.Cliff@dot.ca.gov](mailto:Steven.Cliff@dot.ca.gov)

Rihui (Ray) Zhang, Interim Planning & Modal Programs Deputy Director,  
[Rihui.Zhang@dot.ca.gov](mailto:Rihui.Zhang@dot.ca.gov)

Katie Benouar, Chief, Division of Transportation Planning, Caltrans, [katie.benouar@dot.ca.gov](mailto:katie.benouar@dot.ca.gov)

Will Kempton, Executive Director, California Transportation Commission,  
[will.kempton@dot.ca.gov](mailto:will.kempton@dot.ca.gov)

Susan Bransen, Chief Deputy Director, California Transportation Commission,  
[susan.bransen@dot.ca.gov](mailto:susan.bransen@dot.ca.gov)

Laurel Janssen, Deputy Director, California Transportation Commission,  
[laurel.janssen@dot.ca.gov](mailto:laurel.janssen@dot.ca.gov)

Laurie Waters, Senior Transportation Planner, California Transportation Commission,  
[laurie.waters@dot.ca.gov](mailto:laurie.waters@dot.ca.gov)

Encl.

**Previous Comment letter Re: Recommendations for the 2015 Interregional Transportation Strategic Plan (ITSP) Update**

December 17, 2014

Tracey Frost, System Planning Branch Chief

Caltrans

Office of Multimodal System Planning

Division of Transportation Planning

Sacramento, CA 94274

E-mail: [Tracey\\_Frost@dot.ca.gov](mailto:Tracey_Frost@dot.ca.gov)

[hq.system.planning@dot.ca.gov](mailto:hq.system.planning@dot.ca.gov)

**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."<sup>1</sup> 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,**

---

<sup>1</sup> Caltrans, *Draft Interregional Strategic Plan, Vision and Goals Comparison*, Available at [http://www.caltrans-itsp2015.org/files/managed/Document/49/2A-Draft\\_ITSP\\_Vision-Goals\\_Comparison.pdf](http://www.caltrans-itsp2015.org/files/managed/Document/49/2A-Draft_ITSP_Vision-Goals_Comparison.pdf)

**multimodal** transportation system in California through the interregional network, not act as a barrier to local and regional walking, biking, and transit networks.

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**

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,

Sarah de Guia, Executive Director  
California Pan-Ethnic Health Network

Stephanie Stephens, Executive Director  
California Park & Recreation Society

Wendy Alfsen, Executive Director  
California Walks

Linda Rudolph, MD, MPH  
Center for Climate Change and Health  
Public Health Institute

Richard Raya, Director  
ClimatePlan

Dan Silver, Executive Director  
Endangered Habitats League

Michele Hasson, Regional Director  
Leadership Counsel for Justice and  
Accountability

Matthew Marsom, Vice President  
Public Health Institute

Amanda Eaken, Deputy Director of Urban  
Solutions  
Natural Resources Defense Council

Laura R. Cohen, J.D.  
Director, Western Region  
Rails-to-Trails Conservancy

Veronica Beaty, Land Use Policy Director  
Sacramento Housing Alliance

Jeanie Ward-Waller, Senior Policy Manager  
Safe Routes to School National Partnership

Anne Thomas, Executive Director  
Shasta Living Streets

Liz O'Donoghue Director of Infrastructure and  
Land Use The Nature Conservancy

Joshua Stark, State Policy Director  
TransForm

Teri Duarte, Executive Director  
WALKSacramento

CC:

Katie Benouar, Chief, Division of Transportation Planning, Caltrans, [katie.benouar@dot.ca.gov](mailto:katie.benouar@dot.ca.gov)

Reza Navai, Chief, Office of Multi-Modal System Planning, [reza.navai@dot.ca.gov](mailto:reza.navai@dot.ca.gov)

Bruce De Terra, Chief, Office of System, Freight, & Rail Planning, [Bruce de Terra@dot.ca.gov](mailto:Bruce_de_Terra@dot.ca.gov)

Steve Cliff, Assistant Director for Sustainability, Caltrans, [Steven.Cliff@dot.ca.gov](mailto:Steven.Cliff@dot.ca.gov)

Bill Figge, Acting Deputy Director for Planning and Modal Programs, Caltrans,  
[bill.figge@dot.ca.gov](mailto:bill.figge@dot.ca.gov)

Kate White, Deputy Secretary for Environmental & Housing Policy Coordination, California  
Transportation Agency, [Kate.White@calsta.ca.gov](mailto:Kate.White@calsta.ca.gov)