

ClimatePlan

September 10, 2021

Program Manager Scott Sauer
Chief, Office of Multimodal System Planning
Division of Transportation Planning
California Department of Transportation
Sacramento, CA 94274

Re: Comments on Scoring Criteria for the Draft Interregional Transportation Strategic Plan 2021 (ITSP)

Dear Program Manager Sauer:

Thank you for the opportunity to provide comments on the 2021 Interregional Transportation Strategic Plan (ITSP). ClimatePlan shares your goal to ensure that the ITSP aligns with CAPTI and other recent planning efforts. This alignment would ensure that state funding for interregional projects go to reducing GHG emissions, maximizing investment in sustainable transportation choices, and providing direct benefits to low-income communities and communities of color.

Therefore, we appreciate that Caltrans is taking the time to update the ITSP to align with CAPTI, and we appreciate many of the updates Caltrans has made to the ITSP. Most notably:

- The guiding principles are aligned with CAPTI and have included the direct language of the CAPTI planning document.
- The acknowledgement that previous projects that have received ITIP funds, need to identify improvements to meet the goals of recent planning efforts, if they want to receive more funding from the ITIP (Recent planning efforts include CAPTI, CTP 2050, etc).

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We see these actions as a step in the right direction because they increase alignment and provide greater accountability. These are actions we would like to see in all planning documents moving forward.

However, the ITSP scoring criteria can be strengthened to better match the long-term vision of CAPTI. Current scoring criteria does not maximize investment in sustainable transportation choices, nor prioritize projects that invest in low income communities and communities of color without displacing them. While we want to see communities invested in, we must make sure that we have anti-displacement measures in place.

Therefore, we recommend that CalTrans:

Expand scoring criteria to maximize investment in sustainable transportation choices, especially active transportation.

The draft criteria can be expanded to allow active transportation projects and other sustainable transportation to better compete with highway projects. Caltrans evaluation of safety and improved climate resilience is highway centric. Caltrans should clarify that they will look at other climate vulnerability assessments and evaluate how the project improves safety within the transportation mode accordingly.

Clarify how Caltrans will define meaningful engagement, under the supporting data section and allocate points based on engagement rather than “benefits.”

We appreciate that Caltrans is scoring ITSP projects based on meaningful engagement, however it is unclear what meaningful engagement means. This clarification is vital because not all engagement is the same. For example, allowing comments on agency proposals is not as meaningful as allowing for community leadership and decision making. Moreover, it is confusing to have the scoring for this criteria to be labeled “greatly benefit”, when the criteria is on public engagement. Communities don’t automatically benefit because of the engagement process. When not done properly engagement can feel extractive and tokenizing creating more mistrust and friction.

Create criteria that explicitly evaluates a project based on how it will directly impact the community, including racial equity impacts.

While the public health question and community needs does address this a little, the criteria needs to be expanded. Projects should outline impacts, both positive AND negative in terms of environmental health, access, mobility, affordability, and public health. To this end, points can be allocated according to benefits. No points would be given to projects that harm or provide no benefit to underrepresented and/or low income communities.

Create criteria that explicitly evaluates greenhouse gas emissions, and prioritize projects that reduce emissions.

The project criteria does not explicitly talk about how greenhouse gas emissions will be evaluated. Criteria that lumps together air quality within public health is not adequate. The scoring criteria should ask for the quantification of how much greenhouse gas and toxic air pollutants will be emitted as a result of the project. The highest points would be given to projects that emit less. Under supporting data, CalTrans can provide the methodology to calculate GHG emissions. For example active transportation projects can use the integrated transport and health impact model to evaluate GHG emissions and other health impacts. Without a baseline for how interregional travel contributes to greenhouse gases or data on individual project emissions, California will not be able to realistically reduce GHG.

Through this update of the ITSP, we strongly urge you to prioritize reducing emission, and meaningful community engagement. As we know the ITIP has limited funds. Thus, funding should be directed to projects that maximize sustainable transportation choices, and invest in low-income and communities of color, without displacement. Making the right investments today will create healthy and sustainable communities for everyone in the future.

Sincerely,

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