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July 22, 2013

File Number 1500000

Mr. Andre Boutros, Executive Director
California Transportation Commission
Attention: Mitch Weiss
1120 N Street, Mail Stop 52
Sacramento, CA 95814

MEMBER AGENCIES
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Chula Vista
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Del Mar
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Poway
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Santee
Solana Beach
Vista
and
County of San Diego

ADVISORY MEMBERS
Imperial County
California Department of Transportation
Metropolitan Transit System
North County Transit District
United States Department of Defense
San Diego Unified Port District
San Diego County Water Authority
Southern California Tribal Chairmen's Association
Mexico

Dear Mr. Boutros:

SUBJECT: Comments on the 2014 State Transportation Improvement Program Guidelines

At its May 2013, meeting the California Transportation Commission released the draft guidelines for the 2014 State Transportation Improvement Program (STIP) for comment, and a hearing was conducted on July 18, 2013. The San Diego Association of Governments (SANDAG) appreciates the opportunity to review and comment on the draft guidelines. We also appreciate the comments made by the commissioners that the STIP process should not place additional administrative burdens on the regions, rather streamline the process with work already being conducted at the regional level.

Below are our comments which reflect similar issues raised at the hearing:

1. Section 16 adds language that the Commission will not allocate funds for any phase beyond Preliminary Engineering (PE) unless there is documentation of environmental clearance under National Environmental Protection Agency (NEPA). There are instances in which design can proceed prior to final NEPA clearance which is allowed by the federal agencies. We are concerned this may impact project delivery. We request that either the language be deleted or provide for exceptions to this rule.

2. Section 19 proposes to reduce the project level evaluation of STIP-funded projects from $50 million down to $20 million. Given the rise in project costs and the concurrent reduction in STIP, increasing the threshold would seem more appropriate. We request that either the $50 million remain or actually increase the threshold.

3. Section 19 adds criteria for performance measures. Although SANDAG appreciates the recognition by California Transportation Commission staff of efforts made by SANDAG in coordinating the performance criteria among other Metropolitan Planning Organizations, we agree with comments made by other agencies that we should be able to use the existing performance measures already documented in our various plans and studies.

4. Section 20 adds language that regions incorporate intercity rail improvement needs and include a comparison of projects. There could potentially be conflicts between the regional need and the state need.

   While we have substantial intercity rail needs in the region and on a programmatic basis are included in our long-range plan and short-range program, specific projects nominated by the state may not be identified as a high priority project for the region. We request that the section be revised to require the state to provide the draft intercity rail projects for review and comment by the region and to work cooperatively to ensure that the projects meet both the priorities identified by the region as well as the state. Such action would need to happen on an ongoing basis rather than 90 days prior to submittal of the STIP.

5. Section 64 adds language from Section 16 regarding the allocation of funds beyond PE only after NEPA clearance. We request that this language be deleted or add exceptions.

6. Section 68 adds a requirement that between the adoption of the prior and current Regional Transportation Improvement Plan, regions report project benefits anticipated and actually achieved. We are not clear on what this will accomplish. Actual benefits may be many years after project implementation so the timing of the results may not be accurate.

Again, we appreciate the opportunity to comment and the availability and responses from California Transportation Commission staff. We look forward to continued collaboration with the California Transportation Commission. If you need additional information, please contact Sookyung Kim at sookyung.kim@sandag.org or at (619) 699-6909.

Sincerely,

Gary L. Gallegos

GARY L. GALLEGOS
Executive Director

GGA/SKI/bga

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Del Norte Local Transportation Commission

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July 24, 2013

Mitch Weiss, Deputy Director
California Transportation Commission
1120 N Street, Mail Station 52
Sacramento, CA 95814

RE: Performance Measures in the 2014 STIP Guidelines

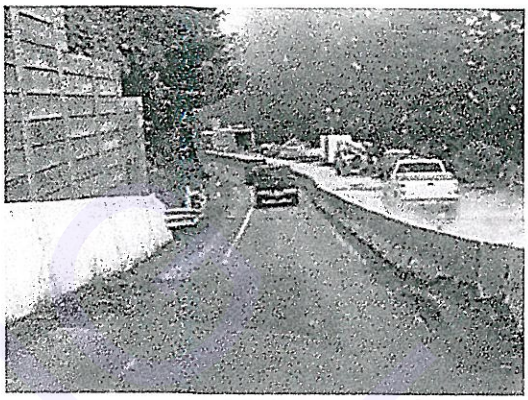
Dear Mr. Weiss,

Del Norte Local Transportation Commission (DNLTC) is presenting suggestions for changes to the 2014 STIP guidelines in the area of performance measures. The Caltrans District 1 and the guidebook, "Performance Measures for Rural Transportation Systems" have informed these recommendations. To facilitate the discussion, I'm using a project on the State Highway as an example: Last Chance Grade.

In the Del Norte region, US Highway 101 has been reduced to a one-lane-sometimes-flooded signalized section by a recurring slide. By that time it reopens to a conventional highway, it will have been a one-lane road for over a year – just in time for the next deluge of 80 to 100 inches of rain. U.S. Highway 101 is a Focus Route, a Lifeline and a Gateway into Oregon 32 miles away. It's also the only road that connects us to other parts of California – there's not even a dirt road alternative.

If Caltrans District 1 had a project today to resolve the issues at this location after decades of failures, and unfortunately it does not, it is unlikely that this project would be competitive for STIP or ITIP funding. While this particular project may not belong in the STIP, it might belong in the ITIP, and regardless, given the severity of the current and ongoing failures to interregional travel at Last Chance Grade, this type of project should rise to the top when performance measures are applied.

For the indicator *Mobility*, the Passenger Hours of Delay / Year does not adequately capture the impact of the delay. For example, when U.S. Highway 101 is closed at Last Chance Grade, a 20-mile trip becomes a 450-mile trip for anyone traveling from Crescent City to Klamath, California. While our *number* of passengers is comparatively small, the *severity* of the delay to those passengers is intense and even dangerous when considering how much of our regional medical care is only available in Eureka, Santa Rosa and beyond.



For the indicator *Accessibility*, we propose a measure that captures the lack of alternative routing in rural areas, and the significant increase in travel times when a route is unavailable. Our Humboldt State University and College of the Redwoods students' educations are at risk, our elementary school in Klamath is at risk, and our access to medical care is dangerously limited.

For the indictor *Reliability*, we need to capture the likelihood that the route will be closed, the impact when there is a route closure and how critical a route is to the viability of a region. Reliability in reference to Last Chance Grade should measure our level of confidence that we can depend on the route being open at all. It's this lack of confidence in a basic two-lane conventional highway that prevents travelers from planning vacations in our area, deters future business development and cripples existing businesses. The current Reliability indicator measures delay per capita, but because our county has only 28,000 residents we can't compete with even small even urban areas. If 95% of the total population is severely impacted by a road closure over a year or a decade (and this percentage is likely too low), then we need a performance measure that captures the intensity of the impact. This is more challenging than capturing the daily vehicle hours of delay, but it's also a more appropriate measurement for rural areas where a reliability issue can turn a 20-mile trip into a 450-mile trip.

Suggestions from District 1 include the following method: First, use a measure of the cost of delay to calculate delay costs for both freight and the traveling public. Next, look at both freight and vehicular traffic and evaluate who may choose not to go due to the delay (for example, if 75% of the regions tourist traffic depends on being able to arrive from the south or continue south, we should be able to calculate the loss to the region for the duration of a closure. Finally, examine those critical access that won't be met and calculate the impact and the cost to the region.

In summary, if the success of interregional travel were evaluated today by the existing performance measures, our only north/south route would not be funded with interregional funds because we don't have the population base to elevate the project even though the impact to our population is severe. I'm not proposing that the CTC should fund Last Chance Grade with STIP or ITIP funds, but I am proposing that this type of long-term severe failure should be competitive when applying the STIP and ITIP performance measures.

Sincerely,

Tamera Leighton, Executive Director

Cc: Caltrans District 1, Del Norte Local Transportation Commission

Los Angeles County
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July 25, 2013

Mr. Andre Boutros
Executive Director
California Transportation Commission
1120 N Street, Mail Station 52
Attn.: Mitchell Weiss

DRAFT 2014 STATE TRANSPORTATION IMPROVEMENT PROGRAM GUIDELINES: SOUTHERN CALIFORNIA REGIONAL AGENCY COMMENTS

Dear Mr. Boutros:

Thank you for the opportunity to comment on the Draft 2014 State Transportation Improvement Program (STIP) Guidelines. I am writing to you to transmit comments that have been discussed and agreed upon by the transportation planning agencies of the Southern California Association of Governments (SCAG) region. We appreciate the longstanding partnership and close working relationship we have developed in working with the California Transportation Commission (Commission) staff over the years. We have been working closely with Commission staff regarding the proposed Guidelines and Commission staff has been very responsive. Comments that have already been agreed to or addressed are omitted from this letter.

The remaining comments reflect our desire to have a STIP which not only allows the Commission and the State to fulfill their responsibilities, but also allows us to attain regional mobility and sustainability objectives. Our comments are as follows:

Section 19: Criteria for Measuring Performance and Cost Effectiveness

- We request the Commission maintain the $50 million threshold as inflation has reduced the value of this amount over time. Additionally, STIP revenues are declining, therefore lowering the threshold would mean more documentation required for less funding.

- The proposed guidelines add new performance measures that would be submitted with our regional program of projects known as the Regional Transportation Improvement Program (RTIP). The list of proposed measures includes a mix of regional and project-specific metrics. We request the option to use metrics from planning studies, such as project study reports, environmental documents and our Regional Transportation Plan (RTP). That would reduce potential duplication of efforts since these three processes include metrics that have been vetted through local and regional efforts.

- Commission staff has indicated that they intend to add language requiring a report on progress in meeting RTP/ Sustainable Communities Strategies goals (SCS). As part of the existing guidelines, the RTIP submittal must demonstrate how it addresses the goals of RTP, which in our region includes the SCS. Since there is proposed language on this subject under consideration as AB 1290, we suggest deferring the inclusion of any new language beyond the current RTP language until the 2016 STIP. This would serve to avoid conflicts between guidelines and any statute that may be enacted.

Section 20: Submittal of RTIPs

- The proposed guidelines add a requirement to provide a comparison of the projects in the RTIP and State Highway needs identified by the California Department of Transportation (Caltrans) including a discussion of significant differences. Currently, based on the existing requirements, the regional agencies already meet and confer with Caltrans on the RTIP submittals. This process has worked in the past and has allowed each region to carefully consider all of its local transportation needs, priorities and requirements associated with voter approved transportation measures. This process is also consistent with Senate Bill 45 (Chapter 622, Statutes of 1997) which directs the regional agencies to establish priorities for STIP funding and select projects to be submitted in its RTIP. Further, the evaluation report required under this section will demonstrate how effective the RTIP is in addressing or achieving the goals, objectives and standards of its respective RTP, which is an effective way of addressing the appropriateness of the RTIP submittal. Therefore, a discussion of significant differences should be left at the discretion of the regional agency.

Section 64: Allocation of Funds

- The Draft 2014 STIP Guidelines include a provision that the Commission will not allocate funds for a federally-funded project prior to documentation of environmental clearance under National Environmental Protection Act (NEPA). We understand that position, but federal law allows the acquisition of right-of-way prior to NEPA completion in certain circumstances, such as a negotiated acquisition that will not cause a significant adverse environmental impact. This provision was supported in MAP-21, and we recommend that the Commission's policies allow this federal streamlining provision to remain intact and available as specific circumstances permit.

- A change is proposed to clarify that Caltrans is responsible for determining a project's readiness when developing a construction allocation request for projects not on the state highway system. The addition of this requirement may push more costs to Caltrans, slow down the allocation process and ultimately delay project delivery. The SCAG region agencies would prefer continuing with the current method, whereby local agencies determine readiness for projects off the state highway system, subject to other timely use of funds issues the Commission may consider.

Section 68: Project Delivery

- We are in agreement with Commission staff on the importance of having good data available to inform funding decisions. However, we have concerns about creating a new reporting requirement as part of the RTIP submittal. First, by requiring evaluation of all completed projects, it is likely that evaluation will be required of some projects which very recently began operations. Many projects may require many months or years to attain projections developed prior to implementation. (For example, projections for environmental documents are forecast to 20 years in the future.) Additionally, gathering the required data would add to the overall project development cost. Finally, the United States Department of Transportation is currently preparing performance measures, but they are not expected to be finalized for some time. We recommend deferring adoption of any new completed project evaluation requirement to the 2016 STIP Guidelines in order to allow the process to be properly informed by federal requirements. Should this not be feasible, at a minimum, we would recommend applying the requirement only to larger projects, using the same $50 million threshold established for project evaluation in Section 19.

Appendix B: Performance Indicators, Measures and Definitions

- We support maintaining the $50 million threshold for project level evaluations.
- We recommend using the same performance metrics described in our Section 19 comment.

Thank you again for the opportunity to comment. Should you have any questions, please contact me at (213) 922-3041.

Sincerely,

PATRICIA CHEN
Project Manager
Regional Programming

Mark Baza, Imperial County Transportation Commission
Kurt Brotcke, Orange County Transportation Authority
Shirley Medina, Riverside County Transportation Commission
Andrea Zureick, San Bernardino Associated Governments
Peter De Haan, Ventura County Transportation Commission
Rosemary Ayala, Southern California Association of Governments

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Keith Millhouse, Ventura County Transportation Commission

July 30, 2013

Mr. Andre Boutros
Executive Director
California Transportation Commission
1120 N Street, Mail Station 52

Attn: Mitch Weiss

RE: DRAFT 2014 STATE TRANSPORTATION IMPROVEMENT PROGRAM GUIDELINES: SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

Dear Mr. Boutros:

The Southern California Association of Governments (SCAG) wishes to thank the California Transportation Commission (CTC) staff for their hard work on the Draft 2014 State Transportation Improvement Program (STIP) Guidelines. While we believe that the draft plan has many positive elements, we also believe that other measures are needed to assure benefits are achieved throughout the SCAG region. The Southern California transportation planning agencies have provided additional project-specific comments which SCAG is in full support of; however, this letter will address regional level comments.

We offer the following regional level comments to the draft 2014 STIP Guidelines:

- Under Section 19, Criteria for Measuring Performance and Cost-Effectiveness, SCAG concurs with the comments made at the 2014 STIP Guidelines hearing that the $50 million threshold should be maintained as inflation has reduced the value of this amount over time. Additionally, since STIP funding levels are in decline, this requirement results in additional administrative requirements and documentation for less funding.

- SCAG agrees that performance measures are important in guiding transportation investment. Section 19 provides criteria for measuring performance of projects in the RTIPs and ITIP. These criteria mirror the performance measures established in SCAG's 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In addition, performance measures are also under development at the federal level with the signing of Moving Ahead for Progress in the 21st Century (MAP-21) with a planned release 18 months after enactment of the bill. To ensure that the performance measures in the RTP/SCS and MAP-21 are in line with the STIP guidelines, SCAG suggests that performance measures should be derived from existing sources so as to eliminate duplicative efforts and reporting.

The Regional Council consists of 84 elected officials representing 191 cities, six counties, six County Transportation Commissions, one representative from the Transportation Corridor Agencies, one Tribal Government representative and one representative for the Air Districts within Southern California.

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- Finally, SCAG requests that Commission staff reevaluate the opportunity for allocating funds for right-of-way activities prior to completion of the National Environmental Policy Act (NEPA) review of a project. Both MAP-21 and SB 375 allow for a condensed regulatory review and support project streamlining. Project streamlining is important to ensuring that projects that demonstrate positive environmental results have the opportunity to compete for funding without having to wait for approval under the NEPA process.

In addition, SCAG has also identified two major changes in the draft Guidelines, which do not appear to streamline the process to further the goal of expediting or accelerating project delivery. These changes are under the following sections:

- Under Section 20, the guidelines now require that the RTPA's include in its RTIP submittal a comparison of the RTIP with the State and intercity rail improvement needs identified by Caltrans, which should include a discussion of the differences between the RTIP and the State identified needs. However, this new requirement creates a potential for conflict of interest between an RTPA and the State regarding intercity rail improvements.

- Section 68 added a requirement that the RTIP should report on any STIP project that was completed between adoptions of the RTIP. The report should provide a discussion of the project benefits anticipated prior to construction compared with an estimate of the actual benefits achieved. The purpose of this requirement is unclear since previous RTIP submittals do not have completed STIP projects. STIP projects that are included in the RTIP are either ongoing or are waiting to start.

It is our hope that the Commission will reconsider the opportunity to allow projects that have not completed NEPA review the opportunity to compete for funding as prescribed under MAP-21.

Thank you for this opportunity to share our feedback on the draft 2014 STIP Guidelines. We look forward to working with Commission staff to ensure that the goals of measuring performance and cost-effectiveness are achieved. Should you or staff have any questions, please contact me at (213) 236-1805.

Sincerely,

Hasan Ikhrata
Executive Director
Southern California Association of Governments

c: Sharon A. Neely, Chief Deputy Executive Director, SCAG
Rich Macias, Director, Transportation Planning, SCAG
Darin Chidsey, Acting Director, Strategy, Policy & Public Affairs, SCAG
Rosemary Ayala, FTIP Manager, SCAG
Naresh Amatya, Transportation Manager, SCAG

CALIFORNIA WALKS
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July 17, 2013

VIA E-MAIL

Chair and Members,
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Sacramento, CA 95814-2742
Andre Boutros@ctc.ca.gov

Secretary Brian Kelly
State Transportation Agency
980 9th Street, Suite 2450
Sacramento, CA 95814-2742
Brian.Kelly@calsta.ca.gov

Re: California WALKS Comments on Draft 2014 California Transportation Fund Estimate and on Draft 2014 State Transportation Improvement Program Guidelines

Chair and Members, California Transportation Commission
Executive Director Boutros:
State Transportation Agency Secretary Kelly:

The California WALKS Network—a coalition of local walk advocacy organizations across the state—would like to thank you for striving to create a multi-modal transportation system which integrates active transportation and recognizes the role of the State of California through the California Transportation Commission (CTC), the State Transportation Agency (STA) and the Department of Transportation (Caltrans), using the vehicle of the California Transportation Plan (CTP) to meet the state's SB 391 statutory commitment to timely achieve the state's AB 32 and Exec. Order climate action goals.[1]

2014 STIP FUND ESTIMATE FINAL ASSUMPTIONS Section Two: Significant Issues-Active Transportation Program (ATP) (@ 15-16): SUPPORT INCLUSION in FE

California WALKS and its network affiliates support the creation of the Active Transportation Program consolidating a number of state program and federal funding sources into one program with state and regional/local allocations as shown in the attached letter to Secretary Kelly. The ATP is an important step forward in California transportation investment with the opportunity to enhance transportation equity and integrate walking and bicycling in a sustainable multi-modal transportation system which improves safety, mobility and

[1] SB 391 (Liu, 2009)

MEETING HANDOUT

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accessibility for all. We look forward to helping deliver final ATP legislation through continued work on Secretary Kelly's stakeholder group with CTC, Agency, Caltrans and DOF staff as well as other stakeholders

.

Please include at least $134.2 million for the Active Transportation Program in the 2014 Fund Estimate, as proposed.

STIP GUIDELINES: Incorporate MAP-21 Funding Eligibilities, SB 391 Sustainable Communities Emissions Reduction Performance Measures, and Detail Pedestrian Eligibilities in the STIP Guidelines

STIP GUIDELINES. Purpose and Authority: Incorporate State's Clean Air Sustainable Community Integrated Multimodal Transportation System Mandates of SB 391 to the STIP Guidelines.

By 2015, California, through California Transportation Plan 2040, is required to

"to address how the state will achieve maximum feasible emissions reductions in order to attain a statewide reduction of greenhouse gas emissions to 1990 levels by 2020 and 80% below 1990 levels by 2050." The bill required "the plan to identify the statewide integrated multimodal transportation system needed to achieve these results" and, by December 31, 2012, required the Department "to submit to the California Transportation Commission and specified legislative committee chairs an interim report providing specified information regarding sustainable communities strategies and alternative planning strategies, including an assessment of how their implementation will influence the configuration of the statewide integrated multimodal transportation system."

CTC received and adopted the required Interim Report, the California Interregional Blueprint, but this is not yet reflected in the STIP Guidelines. The Purpose and Authority Section, at a minimum be amended to add as a basic objective:

- Implement SB 391 and 375 in order to accomplish California's climate action goals including reduction of greenhouse gas emissions to 1990 levels by 2020 and 80% below 1990 levels by 2050.

Ensure CA Includes Funding Eligibility of Walking & Pedestrian Projects as provided for in MAP-21

In the Summary, STIP Guidelines Attachment to Resolution G-13-## and in the STIP Guidelines, amendments implement Map-21's elimination of TE projects, describe but exclude Transportation Alternative Program from the STIP, and omit mention of funding eligibilities created by MAP-21. This may reflect the lack of final state decision-making on new eligibilities.

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It is recommended that at least a placeholder be inserted describing the new MAP-21 eligibilities for fund programming rather than just categorizing them "eligible for Federal funds" (Highlights of the Draft 2014 STIP Guidelines–Guidelines Specific to the 2014 STIP–Transportation Enhancement Projects; Amendments to the Permanent STIP Guidelines-Transportation Enhancement Projects in the RTIP (Section 22) and in the ITIP (Section 35)).

Although 13.4% of all trips in California are walking trips,[2] walking as a transportation mode is consistently underfunded—with **combined** spending on walking and bicycling active transportation, over the next ten years, is planned to be a mere 2.3% of State transportation spending.[3] MAP-21 articulates added pedestrian programming eligibility which California should add to its funding eligibility

In the Amendments to the permanent STIP Guidelines section of the Summary Highlights, Criteria for Measuring Performance adds criteria related to vehicle miles travelled. California WALKs requests that, in recognition of the multi-modal nature of California's transportation system, we begin to incorporate broader performance measures which account for all trips by all modes. VMT can become Total Person Miles Travelled or Total Person Trips, counting travel by # person trip mile/# goods movement ton miles rather than by vehicle miles.

Performance Indicators, Measures and Definitions (Appendix B) it is requested that measures which account for ALL trips be added or that changes be made to include all travel and assess the performance of the entire California transportation system. For example, "Daily vehicle hours of delay per capita" is proposed to be added. A more meaningful and multi-modal performance measure would be *"Daily trip hours of delay per capita."*

From the vehicle-pedestrian perspective, an intersection measured by "Daily vehicle hours of delay" is widened by two left turn only lanes and one right turn only lane and pedestrians are prohibited from crossing on the left turning leg of the intersections. This improves the intersection according to this vehicle performance indicator.

From the pedestrian perspective, more than 5 minutes have been ADDED in delay to travel that same leg of the intersection, by the addition of 3 lane widths across one leg and by the addition of 2 leg crossings in order to navigate the former one leg of the intersection. In intersection performance, only vehicle but not person delay is captured. (A Sacramento example of this is at the Sacramento Amtrak Station/Hwy 99 on-ramp 4th & I streets intersection; a SF Bay Area example is at the Del Norte BART station,/Hwy 80 on ramp at San Pablo Ave/MacDonald St intersection). A multi-modal performance measure captures delay reduction for all travelers.

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[2] Federal Highway Safety Administration, U.S. Department of Transportation "California Trip Percents By Trip Mile and Mode," 2009 National Household Travel Survey, California Daily Trip File. Prepared by Leonard Seitz, Caltrans, Transportation System Information. April 2013.

[3] California Transportation Commission, "Summary Table. Cost of Projects to be Completed Between 2011-2020." 2011 Statewide Transportation Needs Assessment, November 2011. Available at http://www.catc.ca.gov/reports/2012%20Reports/Trans_Needs_Assessment_corrected_01172012.pdf

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Similarly, :"*Daily congested trip miles travelled per capita*" would capture congested bus, rail, walk and bike trip miles as well as highway VMT trip miles. Performance measures which include all trips and all trip miles are recommended. Vehicle Miles Travelled omits about 20% of all trips (transit, walking and bicycling largely omitted).

ATTACHMENT to RESOLUTION G-13-##
STIP Guidelines Policies and Procedures Specific to the 2014 STIP

ADD MAP-21 New Eligibilities in addition to MAP-21 Exclusions. At pg. 3, *Transportation Enhancements projects* summarizes the elimination of the Transportation Enhancements (TE) program and mentions the establishment of the Transportation Alternatives Program (TAP) A half page description of MAP-21 of Transportation Alternative exclusions of former TE eligible activities follows.

Nowhere are new, added MAP-21 (non-TAP) eligibilities detailed. The information is consistently limited to "Existing Transportation Enhancement projects may remain in the STIP so long as they are eligible for State Highway Account or Federal Funds" No mention or detail of new programming eligibility created by MAP-21 is included. Addition of a section for

- *MAP-21 Projects* (with a similar one half page of project eligibility detail) added to the Attachment at page 3, briefly summarizing the new eligibilities create by MAP-21 is needed.

Caltrans Benefit/Cost Model At pg. 4, the STIP Guidelines' expansion of project-level evaluation is described. California WALKS strongly support the Commission request that

"Caltrans expand the model to include bicycle and pedestrian projects in order to improve information available to decision makers at the regional and state level."

We request that a mandatory requirement rather than a request be imposed on Caltrans. Furthermore, we request that , consistent with MAP-21 and HSIP eligibility, that the *Caltrans Benefit/Cost Model expansion requirement include non-infrastructure as well as infrastructure project eligibility and evaluation,* with adoption of performance measures for both types of programming. Caltrans can apply the Office of Traffic Safety performance measures and evaluation metrics until it proposes alternate non-infrastructure safety performance measures. The federal Strategic Highway Safety Plan requirement clearly recognizes that at least 4 non-infrastructure strategies are necessary in tandem with infrastructure to realize safety performance goals: Enforcement, Education, Emergency Response and Evaluation with Engineering.

STIP GUIDELINES: Add Implementation of State's Clean Air Sustainable Community Mandates of SB 391 and 375 throughout the STIP Guidelines.

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There are necessary additions needed to reflect a broadened integrated multimodal transportation system scope mandated by SB 391. These include incorporation of the Smart Mobility 2010 Report and the Complete Streets Implementation Plan, as well as the recommendations of the CIB 2012 in the Guidelines.

Prioritize Safety & Address Inequities in Traffic Fatalities & Serious Injuries

One of the biggest barriers to walking and biking in California is the lack of safe conditions and facilities. Pedestrians alone comprise more than 22% of all California 2010 traffic fatalities (nearly twice the national average and rising annually).[4] Older adult pedestrians fare even worse with a fatality rate 63% higher than the national average—ranking third highest in the nation.[5] Low-income and disadvantaged communities in California bear a disproportionate share of the pedestrian fatalities and serious injuries and in fact, are less likely to have basic walking infrastructure such as sidewalks (49% v. 89%) and roughly half as likely to have traffic calming features or marked crosswalks when compared to higher-income communities.[6] We strongly urge the State to prioritize safety—through comprehensive engineering, education, and enforcement strategies—as one of its guiding principles and to address inequities in traffic fatalities and serious injuries (between modes, as well as within disadvantaged communities).

Focus Investment on Mode Shift for Short Trips

While trips over 10 miles comprise 17.4% of all trips in California, nearly one third (30.2%) of all trips statewide are one mile or less.[7] Yet, 59.7% of these very short trips are currently made by motor vehicle, whereas only 33.9% of these trips are on foot.[8] Given that the average walk distance per trip is roughly three-quarters of a mile,[9] California's investment in creating safe and walkable places to shift these short trips from the highest polluting per mile mode (motor vehicle) to non-polluting walk trips is an efficient and promising strategy for meeting greenhouse gas emissions reduction targets mandated by SB 375 and SB 391. We urge you to prioritize STIP projects which focus on short trips (3 miles or less)—constituting 53.2% of all trips in the State[10] —which are the most likely candidates for mode-shifting to walk or bike trips. Since each trip start produces the highest emissions, mode shift among these trips has a greater /mile GHG emission reduction benefit.

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[4] National Center for Statistics and Analysis, "Table 7. Motor Vehicle Crash Fatalities, Pedestrian Traffic Fatalities and Fatality Rates by State, 2010," Traffic Safety Facts: Pedestrians, 2010 Data, National Highway Traffic Safety Administration. DOT-HS-811-625, August 2012. Available at http://www-nrd.nhtsa.dot.gov/Pubs/811625.pdf

[5] *Id.*

[6] Bridging the Gap. "Income Disparities in Street Features that Encourage Walking," March 2012. Available at http://www.bridgingthegapresearch.org/_asset/02fpi3/btg_street_walkability_FINAL_03-09-12.pdf

[7] *Supra* 1.

[8] McGuckin, Nancy, "Table 10. Percent of Trips One Mile or Less by Means of Travel." *Walking and Biking in California: An Analysis of the California-National Household Travel Survey*, August 2012. Available at http://www.travelbehavior.us/Nancy-pdfs/Walking%20and%20Biking%20in%20California%20Final.pdf

[9] *Supra* 7 at 13, "Table 8. Average Walk Trip Length and Sum of Miles by MPO."

[10] *Supra* 1.

Advocating Walkable Communities for Everyone

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Reward Localities for Pedestrian Planning & Assist Disadvantaged Communities without Resources to Conduct Pedestrian Planning

Throughout the entire state, there are only 41 standalone Pedestrian Master Plans and an additional 77 combined Bicycle and Pedestrian Master Plans. This number pales in comparison to the number of standalone Bicycle Master Plans in California – due in large part to the BTA's requirement for jurisdictions to have a bicycle plan in order to be eligible for BTA funds. In our review of combined Bicycle and Pedestrian Master Plans, we have found that these combined plans oftentimes neither adequately address pedestrian needs nor develop pedestrian projects with the same degree of detail as road, transit, rail or bicycle projects. The plan requirement should include a parallel pedestrian plan requirement in order to be eligible for STIP funds.

SB 391 presents California with a great opportunity and we urge you to incorporate its mandate in the STIP Guidelines and move the Guidelines to define and prioritize investment in an integrated multimodal transportation system as required. The California Transportation Commission has a unique opportunity to set a national benchmark for California as a leader in sustainable transportation!

We look forward to the continuing opportunity to work with you in realizing a California integrated multimodal transportation system

Sincerely,
Wendy L Alfsen
Wendy Alfsen, Executive Director
California WALKS

CC:

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MEETING HANDOUT

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July 17, 2013

VIA E-MAIL

Secretary Brian Kelly
State Transportation Agency
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Re: Principles to Advance Walking within the Proposed Active Transportation Program

Dear Secretary Kelly,

The California WALKS Network—a coalition of local walk, blind, and disability advocacy organizations across the state—would like to thank you for striving to bring active transportation to the forefront of the Transportation Agency. Despite accounting for 13.5% of all trips in California,[1] walking as a transportation mode has been consistently underfunded—with **combined** spending on walking and bicycling over the next ten years planned to be a mere 2.3% of the State's transportation spending.[2]

With a consolidated Active Transportation Program (ATP), we are excited by the opportunity to increase funding over time to meet the walking and biking needs of

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[1] McGuckin, Nancy. *Travel to School in California: Findings from the California – National Household Travel Survey.* 2013. Available at http://www.travelbehavior.us/Nancy-pdfs/Travel%20to%20School%20in%20California.pdf

[2] California Transportation Commission, "Summary Table. Cost of Projects to be Completed Between 2011-2020." *2011 Statewide Transportation Needs Assessment*, November 2011. Available at http://www.catc.ca.gov/reports/2012%20Reports/Trans_Needs_Assessment_corrected_01172012.pdf

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Californians. While we are supportive of the concept of a single Active Transportation Program, we do have concerns with the proposal as written. We strongly urge you to consider the following suggestions in order to ensure that the Active Transportation Program supports **both** walking and bicycling in California.

Ensure Eligibility of Walking & Pedestrian Projects in Statute

In consolidating the various state programs, the trailer bill adopted language wholesale from existing statutes without making the necessary additions to reflect a broadened active transportation scope. In particular, project eligibilities in the trailer bill drawn from the Bicycle Transportation Account (BTA) remain exclusively focused on bicycle projects. A true Active Transportation Program must accord walking the same level of treatment in statute as biking; otherwise, it is "active transportation" in name only. Accordingly, we urge you to include comparable pedestrian and walking facilities, projects, and programs when bicycle facilities, projects, and programs are mentioned in the final enacting legislation. Examples of eligible walking and pedestrian projects could include, but are not limited to:

- **Sidewalks, pathways, walkways;**
- **Curb extensions/bulb-outs;**
- **Median refuge islands;**
- **Striping** (high-visibility crosswalks, pedestrian warnings);
- **Signage** (CA-MUTCD R1-5, R1-5a, R1-6, R1-6a, R1-9, R1-9a, R10-15, W11-2, SW50 (CA));
- **Signals** (pedestrian hybrid beacons, rectangular rapid flashing beacons, accessible pedestrian signals, signal timing adjustments);
- **Pedestrian-level lighting**; and
- **Pedestrian facilities related to transit** (bus shelters, benches).

We believe including walking and pedestrian project eligibilities parallel to bicycle project eligibilities is a simple and straightforward change that is essential for the ATP to live up to its active transportation name, scope, and purpose.

Prioritize Safety & Address Inequities in Traffic Fatalities & Serious Injuries

One of the biggest barriers to walking and biking in California is the lack of safe conditions and facilities. Pedestrians alone comprise more than 22% of all California 2010 traffic fatalities (nearly twice the national average and rising annually).[3] Older adult pedestrians fare even worse with a fatality rate 63% higher than the national average—ranking third highest in the nation.[4] Low-income and disadvantaged communities in California bear a disproportionate share of the pedestrian fatalities and serious injuries and in fact, are less likely to have basic walking infrastructure such as sidewalks (49% v. 89%) and roughly half as likely to have traffic calming features or marked crosswalks when compared to higher-income communities.[5] In pursuing an

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[3] National Center for Statistics and Analysis, "Table 7. Motor Vehicle Crash Fatalities, Pedestrian Traffic Fatalities and Fatality Rates by State, 2010," *Traffic Safety Facts: Pedestrians, 2010 Data*, National Highway Traffic Safety Administration. DOT-HS-811-625, August 2012. Available at http://www-nrd.nhtsa.dot.gov/Pubs/811625.pdf

[4] *Id.*

[5] Bridging the Gap. *Income Disparities in Street Features that Encourage Walking*, March 2012. Available at http://www.bridgingthegapresearch.org/_asset/02fpi3/btg_street_walkability_FINAL_03-09-12.pdf

ATP, we strongly urge the State to prioritize safety—through comprehensive engineering, education, and enforcement strategies—as one of the guiding principles of the program and to address inequities in traffic fatalities and serious injuries (between modes, as well as within disadvantaged communities).

Focus Investment on Mode Shift for Short Trips

While trips over 10 miles comprise 18.6% of all trips in California, nearly one third (32.3%) of all trips statewide are one mile or less.[6] Yet, 59.7% of these very short trips are currently made by motor vehicle, whereas only 33.9% of these trips are on foot.[7] Given that the average walk distance per trip is roughly three-quarters of a mile,[8] California's investment in creating safe and walkable places to shift these short trips from the highest polluting per mile mode (motor vehicle) to non-polluting walk trips is an efficient and promising strategy for meeting greenhouse gas emissions reduction targets mandated by SB 375 and SB 391. We urge you to prioritize funds from the Active Transportation Program on short trips (2 miles or less)—constituting 45.6% of all trips in the State[9]—which are the most likely candidates for shifting to walk or bike trips.

Reward Localities for Pedestrian Planning & Assist Disadvantaged Communities without Resources to Conduct Pedestrian Planning

Throughout the entire state, there are only 41 standalone Pedestrian Master Plans and an additional 77 combined Bicycle and Pedestrian Master Plans. This number pales in comparison to the number of standalone Bicycle Master Plans in California (approximately 173 as of 2010)[10]—due in large part to the BTA's requirement for jurisdictions to have a bicycle plan in order to be eligible for BTA funds. In our review of combined Bicycle and Pedestrian Master Plans, we have found these combined plans oftentimes neither adequately address pedestrian needs nor develop pedestrian projects with the same degree of detail as bicycle projects. If the BTA bicycle plan requirement is carried over into the ATP, we urge you to either include a parallel pedestrian plan requirement that mirrors the existing statutory components for bicycle plans or to expand the existing language of the bicycle plan requirement to include walking and pedestrian needs, projects, and programs in order to be eligible for ATP funds. For disadvantaged communities without the resources to undertake pedestrian (or bicycle) planning, we urge the State to set aside and designate a portion of Caltrans' Community-Based Transportation Planning and Environmental Justice grants as an Active Transportation Planning Fund for Disadvantaged Communities—this would help to level the playing field between communities and demonstrate a commitment to reducing transportation disparities under federal Title VI requirements.

Establish State & Regional Advisory Committees for ATP Guideline Development & Project Selection

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[6] McGuckin, Nancy. *California Statewide Person Trip-Length Frequency*, April 2013. (Unpublished Data)

[7] McGuckin, Nancy, "Table 10. Percent of Trips One Mile or Less by Means of Travel." *Walking and Biking in California: An Analysis of the California-National Household Travel Survey*, August 2012. Available at http://www.travelbehavior.us/Nancy-pdfs/Walking%20and%20Biking%20in%20California%20Final.pdf

[8] *Supra* 7 at 13, "Table 8. Average Walk Trip Length and Sum of Miles by MPO."

[9] *Supra* 6.

[10] "Bicycle Transportation Plan Status," Caltrans, May 2010. Available at http://www.dot.ca.gov/hq/LocalPrograms/bta/PDFs/BTP_List052610.pdf

Public engagement and transparency should be key operating principles of the ATP. Accordingly, we recommend that both state and regional advisory committees be established with representation from diverse stakeholders, including but not limited to walking/pedestrian organizations, bicycling organizations, environmental organizations, public health, health equity, social justice, and accessibility/disability groups, etc. These advisory committees should be heavily involved in the development of ATP program guidelines and implementation for both the State and regions, as well as in project scoring/selection.

Ensure Adequate Staffing for the ATP in the Caltrans Division of Local Assistance, Office of Community Planning, and the California Transportation Commission
With such a transformative program, the State needs to match the ambition of the ATP with adequate staffing. Ensuring the program's success requires a dedicated and knowledgeable team of active transportation professionals. At a minimum, we recommend that the state Safe Routes to School Coordinator, state Pedestrian/Bicycle Coordinator, and Complete Streets staff[11] should be maintained and a new Active Transportation Program Coordinator position within the California Transportation Commission be created.

The ATP presents California with a great opportunity to set a national trend for safe and accessible walking and biking infrastructure, while also prioritizing the needs of the most at-risk and disadvantaged communities. We look forward to working with you to ensure that walking is a core component of the Active Transportation Program, and to making California a leader in active transportation!

Sincerely,

Wendy Alfsen, Executive Director
California WALKS

Teri Duarte, Executive Director
WALKSacramento

James D. Stone, Executive Director
WalkSanDiego

Jonathan Bair, President of the Board
Walk Oakland Bike Oakland

Elizabeth Stampe, Executive Director
Walk San Francisco

Deborah Murphy, Executive Director
Los Angeles Walks

Rye Baerg, Chair
Walk Bike Glendale

Lucy Gigli, President, Board of Directors
Bike Walk Alameda

Donna Pomerantz, President
California Council of the Blind

Bob Planthold, Board of Directors
SF Bay WALKS

[11] The Senate Budget Subcommittee 2 restored five Division of Transportation Planning positions related to the Caltrans' Complete Streets program on May 16, 2013 in order to continue work on the Complete Streets Implementation Plan. *See* http://sbud.senate.ca.gov/sites/sbud.senate.ca.gov/files/SUB2/Outcomes05162013Sub2Trans.pdf. These positions were blue-penciled by the Governor in the adopted budget, but we strongly urge that these positions be restored. Without adequate active transportation staffing, neither the ATP nor the Complete Streets Implementation Plan will be successful in shifting active transportation to the forefront of the Transportation Agency.

MEETING HANDOUT

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