



California Transportation Commission

March 8, 2022

Dear Commissioners,

At your March meeting, you will be adopting updated guidelines for the State Highway Operations and Protection Program (SHOPP). These will be the first major guidelines to be revised since the adoption of the Climate Action Plan for Transportation Infrastructure (CAPTI) and we, the undersigned organizations, urge you to ensure they expressly integrate both the CAPTI Framework and the Caltrans Equity Statement.

Our groups appreciate how important the SHOPP is to maintaining the state's roads and bridges in good repair and appreciate the methodical approach the state is taking. Over the past couple of years, we have also seen Caltrans and CTC begin to integrate Complete Streets and climate adaptation into the planning process for SHOPP.

Yet more needs to be done to both prevent and prepare for the worst impacts of climate change. In addition, the tremendous amount of funding in the SHOPP can help balance long-standing inequities in our transportation system. That is why the undersigned groups would like the CAPTI Framework and the Caltrans Equity Statement (CES) more thoroughly woven into the fabric of the SHOPP guidelines.

Many of our organizations met with your staff and we appreciate how receptive they have been to considering additional changes to the guidelines. Though there was not sufficient time to incorporate them we hope they can be adopted at the March CTC meeting. They include:

### **1) Stronger CAPTI and Caltrans Equity Statement Statements**

In Section 17 it states that "Caltrans **shall take** CAPTI strategies as well as the CES **into consideration** in the development and implementation of the Transportation Asset Management Plan" and in Section 18 that statement applies to the State Highway System Management Plan.

We believe it should be stronger and state "Caltrans **shall expressly incorporate** CAPTI strategies and policies in the development and implementation of the ..." in both of these sections.

### **2) Inclusion in the Performance Benchmark Report**

When Caltrans provides an annual report on targets and performance measures to the Commission, we believe it should include a section outlining progress towards implementing strategies and metrics in the CAPTI framework and the Caltrans equity statement. We understand such measures may need to be developed and is not a statutory requirement, but we believe it is vital.

### **3) Improving the SHOPP information available to the public**

We greatly appreciate the work Caltrans has done to make the SHOPP more transparent, especially the development of the 10-year SHOPP Project Book that allows an interactive map-based view of all of the projects in the SHOPP pipeline. In the SHOPP Preparation, we'd like to see:

- The Complete Streets Decision Documents (CSDD) for each project that has one included with the project description. This is the best way to understand not just

what complete streets elements were included or not, but the decision-making process that led to it.

- Publish the four-year SHOPP document in a CSV or excel-based tabular format to allow for ease of review. While this could potentially be accomplished by filtering the Project Book doing so may be complicated for some stakeholders.
- We'd like the project descriptions to use specific and objective language (e.g. "widen bridge") to describe projects and avoid ambiguous value-based terms (e.g. "improve" or "upgrade").

#### **4) Public Review of the Initial Draft of the proposed SHOPP**

The guidelines call on Caltrans to release the **initial draft** of the proposed SHOPP with Regional Transportation Planning Agencies by December 7 of odd-numbered years. We'd like to see it released to members of the public as well as well at that time.

We urge you to adopt these recommendations at the March meeting. Transportation's share of California's GHGs has been growing, and now represents 50% of the total; with over 40% as direct tailpipe emission and another 10% for transportation fuel refining and distribution. We must do everything possible to ensure all investments, even those primarily focused on a fix-it-first framework, are doing all they can to incorporate strategies that advance both climate protection and racial equity.

Thank you for all you are doing and please feel free to reach out to any of us or contact Stuart Cohen, TransForm's Senior Policy Advisor, at [Stuart@Transformca.org](mailto:Stuart@Transformca.org) for more information.

Sincerely,

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TransForm

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CA-NURSES  
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Center for  
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LifeLong  
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PUBLIC HEALTH  
ADVOCATES



March 10, 2022

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**Subject:** Comments on CAPTI Implementation in re: SHOPP program

Dear Chair Eager and Commissioners:

As members of the health and medical community in California, we are writing to provide comments on the pending discussion of the State Highway Operations and Protection Program (SHOPP) 2022 projects cycle and guidelines. Transportation decisions are ultimately public health decisions, and we urge the Commission to carefully consider the Climate Action Plan for Transportation Infrastructure (CAPTI) goals for health and health equity within all decisions.

Californians face the most difficult air pollution challenges in the United States, with over 90 percent living in communities impacted by unhealthy levels of pollution. California is home to seven of the ten most ozone-polluted cities, and six of the most particle-polluted cities in the United States according to the American Lung Association's State of the Air 2021 report. The impacts of poor air quality include asthma attacks, heart attacks and strokes, lung cancer and premature death. The burdens of unhealthy air fall most heavily in lower-income communities and communities of color, both in terms of exposure to harmful air and associated health impacts. In California the vast majority of ozone-forming pollution is generated by the transportation sector, as is over half of greenhouse gases that cause climate change. Ongoing increases in vehicle miles traveled continue to counteract progress on curbing pollution.

Recognizing the need for healthier, more equitable, safer, and climate-friendly transportation investments, Governor Newsom directed the California State Transportation Agency (CalSTA) to develop

a plan to align \$5+ billion in state transportation funding toward these goals. The CAPTI framework was completed in July 2021 and laid out key goals for addressing “social and racial equity by reducing public health and economic harms and maximizing community benefits” as well as implementing “projects that do not substantially increase passenger vehicle travel.” The \$4.2 billion SHOPP process is the first (and most substantial) implementation test of the CAPTI framework.

Ultimately, CAPTI goals must now be central to SHOPP guidelines and project lists. Prior to adoption, the California Transportation Commission should clearly illustrate actions demonstrating alignment with CAPTI, including:

- That future SHOPP funded projects, as expressed through the Guidelines update, will incorporate CAPTI strategies as well as health, equity and other goals.
- That the development and implementation of the programs that feed into the SHOPP, such as the Transportation Asset Management Plan, will also incorporate CAPTI strategies.
- That the annual performance report shall include a section outlining progress towards implementing strategies in the CAPTI framework and other health and equity goals.
- That the public has adequate access to data and robust opportunities for input on the proposed SHOPP project lists, including clear metrics for alignment with CAPTI goals.

We urge the Commission to ensure 2022 and all future cycles of SHOPP projects and guidelines reflect the intent of the CAPTI to protect and improve health and reduce disparities. Please contact Will Barrett at [William.Barrett@Lung.org](mailto:William.Barrett@Lung.org) for any additional information.

Sincerely,

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