



CCA EJ

Community Action and Environmental Justice

Centro de Acción Comunitaria y Justicia Ambiental

March 29, 2016

Gabriel Corley, CTP Project Manager
Division of Planning, MS-32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001
ctp2040@dot.ca.gov

VIA EMAIL

Re: California Transportation Plan 2040

Dear Mr. Corley:

On behalf of the Center for Community Action and Environmental Justice (CCA EJ) we acknowledge the substantial effort required to develop the long-range plan and the vision outlined for a healthy, sustainable and equitable California where all residents can enjoy the benefits of safe, convenient and affordable transportation options regardless of income, place and/or race. Through this correspondence we incorporate comments submitted by the Safe Routes to Schools National Partnership coalition letter (Coalition Letter) and add additional suggestions below that reflect the needs and opportunities of environmental justice communities in Southern California's Inland Empire region.

- **Develop a prioritization process for implementation of the goals and policies in the most heavily burdened regions and communities.** In addition to the prioritization recommendations outlined in the Coalition Letter, we recommend Caltrans develop a prioritization process for implementation in the most heavily burdened regions' disadvantaged (DAC) and environmental justice (EJ) communities. State laws, policies and programs provide mechanisms and frameworks that identify regions and communities facing inequitable environmental and socio-economic burdens. Prioritizing implementation of the Plan's goals and policies in the most polluted regions, specifically the Inland Empire, and in the most vulnerable communities within these regions would address historic patterns of disinvestment and limited planning. In particular we recommend the prioritization process rely on the California Environmental Protection Agency (CalEPA)'s California Communities Environmental Health Screening Tool: CalEnviroScreen Version 2.0 (CalEnviroScreen 2.0) to identify disadvantaged communities and environmental justice communities that would benefit most from prioritizing the plan's policies and goals. We further recommend prioritizing regions challenged with historic patterns of underinvestment.
- **Focus on neighborhood level connectivity and access to commuter rail as opposed to just high-speed rail for improving transit.** Many DAC residents lack efficient access to multi-modal transportation systems, networks and infrastructure thus limiting resident access to basic goods and services within their own communities. The Plan relies heavily on High-Speed Rail and intercity rail connections to HSR, including Goal 1, Policy 1 as an effective method for improving transit option for all Californians. Unfortunately, the myopic focus on HSR eludes residents, particularly those in the Inland Empire, who do not benefit from basic and efficient multi-modal transportation systems, in particular access to commuter rail. We recommend Caltrans increase the focus in the CTP 2040 on improving neighbor level access to multi-modal transportation options, in particular transit, local commuter rail and bus routes, with an

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emphasis on funding for transit operations and maintenance. We recommend Caltrans reevaluate this focus and prioritize investments in DACs lacking neighborhood level mobility and multi-modal transportation infrastructure.

- Foster an equitable and sustainable approach to “Fix It First,” including environmental mitigation provisions, environmental justice language and transit operations and maintenance, that helps us preserve and improve the system we currently have.** As noted in the Coalition Letter, “Fix it First” emphasizes “asset management”, underscoring the movement of goods as opposed to the movement of people. Although we understand the importance of efficient goods movement and the need to fix our deteriorating transportation infrastructure and systems, enabling improved people movement within the “Fix it First” approach is undervalued in the Plan. Investing in improved systems and infrastructure that fix deficient systems people rely on to access jobs, groceries, healthcare and other basic goods and services fosters improved access to economic prosperity. Furthermore, ample environmental mitigation strategies that ensure the most vulnerable communities situated within close proximity to these roadways do not bear inequitable burdens of repairs, should be prioritized in this approach. “Fix it First” should not only provide improvements to the existing systems, but should provide protection to vulnerable communities and improved access to opportunity for residents of DACs and EJ communities. In order to ensure transportation systems and network improvements provide economic, environmental and health benefits, residents of DACs and EJ communities should be involved in the decision making and planning processes.

In addition to the language recommendations outlined in the Coalition Letter we would also like to take this opportunity to provide recommendations for improving the Plan language. Page references are provided below:

Chapter	Page	Section	Comment
1	22	People	The Plan should reflect improved transit options and increased access to opportunity through alternate modes of transportation for all residents of California. Residents of impacted communities are experts in community use of transportation systems and networks; as such residents can provide planners and decision makers with verified information on current transportation use and identify projects most likely to result in substantial mode shift as well as contribute to improved health and environmental outcomes. Furthermore, the majority of poor health outcomes related to the transportation sector occurs in DACs and EJ communities; by prioritizing mitigation measures, increased public participation and improved investments to these communities, the transportation sector has the opportunity to impact those people bearing the heaviest burdens of the sector.
1	26	Prosperity	This section should include discussion of myriad economic benefits efficient transportation networks and systems provide to low-income residents, particularly transit dependent residents living in DACs and EJ communities.
2	39	Sustainable Freight & Ports	This section should include an analysis of impacts on Sustainable Freights & Ports on all DAC and EJ communities along Freight Corridors and in close proximity to Ports. This section should provide best practices of mitigation strategies from those DAC and EJ communities.

			Zero/near Zero technology needs to be prioritized.
2	52	Transit	In addition to the needs outlined in the Coalition letter, transit agencies need to prioritize improved service to the DACs and EJ communities within their service boundaries.
4	96	Goal 2 - Fix-it-First and Asset Management	The Asset Management process presents an opportunity to prioritize systems improvements based on community identified needs and resources. Residents are key in identifying efficient uses of our transportation assets and can provide effective alternatives that provide more opportunities for safe access to a variety of users, particularly users from DAC and EJ communities. This section should include clear guidance on integrating resident expertise into the Asset Management strategic process.
4	102	Goal 3, Policy 1, bullet 3	“Prioritize funding <i>in disadvantaged communities and environmental justice communities</i> toward efficient and affordable transportation options, <i>especially walking, bicycling, and transit</i> , to key job centers and local businesses to stimulate economic activity.”

We appreciate the opportunity to provide meaningful input on the Plan. This Plan provides California with a unique opportunity to address historic patterns of disinvestment and create pathways to economic and environmental dignity for California’s most vulnerable communities. We look forward to discussing these recommendations in further detail. If you have any questions, feel free to contact us.

Sincerely,

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