



ClimatePlan



August 30, 2024

Jon Pray, Assistant Chief Engineer
California Transportation Commission
1120 N Street MS-52
Sacramento, CA 95814

Re: SHOPP Guidelines Update

Dear Mr. Pray:

Thank you for the opportunity to provide input to the 2024 update to the SHOPP Guidelines. We request that you consider the following changes to the SHOPP Guidelines:

1. Prepare to incorporate new complete streets requirements in SB 960

SB 960 has just passed the Legislature and is pending signature by Governor Newsom, and requires that Caltrans make a number of critical changes to implementation of complete streets and transit priority in developing the SHSMP and the SHOPP. We recommend that the CTC be prepared to incorporate language into the SHOPP Guidelines that recognizes the new requirements in SB 960, and provide strong oversight to Caltrans implementation of SB 960. As co-sponsors and supporters of SB 960 that were involved in drafting and negotiating the language in the bill we would welcome the opportunity to meet with CTC staff and discuss the new requirements.

2. Clarify eligibility for operational improvements that may be used to widen highways in Section 12 - Eligibility

We appreciate that CTC staff has proposed to clarify a number of the types of SHOPP-eligible operational improvements in this update to the SHOPP Guidelines. In updating this section of the guidelines, we would recommend that the CTC be very clear that operational improvements that increase vehicle-miles traveled (VMT) should be avoided and are not aligned with the Climate Action Plan for Transportation Infrastructure. We are specifically concerned about

clarifying the eligibility for auxiliary lanes, shoulder widening, multimodal corridor projects, and managed lanes, as these types of projects are most often utilized by Caltrans to facilitate widening the roadway and adding new lanes.

For example, we would recommend clarifying that auxiliary lanes should not be funded by the SHOPP in a manner where they can be connected between multiple exits in a row resulting in a continuous general purpose lane. We also recommend that the eligibility for shoulder widening or improvement clearly state that shoulders should not be widened with SHOPP funds if plans or future projects in the same corridor indicate the intent to add a lane in the same location where the shoulders will be widened. Where the guidelines refer to “justification on the basis of an engineering analysis” for auxiliary lanes or for any other eligible project type, we recommend that the engineering analysis clearly demonstrate that the project will not increase VMT.

3. Improve public transparency of SHOPP project data

We recommend clarifying the language in the sections of the SHOPP Guidelines that refer to making project information publicly accessible to specify that project data should include whether a SHOPP project will be jointly funded with a local project as well as whether Caltrans determined to not include any identified complete streets needs in the complete streets decision document for the project. Project initiation documents (PIDs) should also be made available online in a searchable format so details supporting project decisions can be reviewed by the public. In conducting a review of projects in the 2024 SHOPP, CalBike had to submit Public Records Act requests to Caltrans in order to gain access to SHOPP PIDs.

4. Clarify SHOPP eligibility requirements for combining SHOPP and non-SHOPP projects

We appreciate that CTC staff is proposing language to clarify the guidelines for combining SHOPP and non-SHOPP projects, and for those jointly funded with state and local funding. We support stronger language clarifying the process for jointly funding projects. We recommend that CTC staff be specific that when SHOPP projects are advanced alongside other projects, especially projects that propose to add new lanes to the state highway system, Caltrans and joint project sponsors shall clearly delineate the project components and cost of those components that are SHOPP-funded versus funded with other funds. CTC staff and the public should be able to clearly determine that SHOPP funds are not being used for any project components that add new lanes to the system.

We look forward to meeting with you to discuss our recommendations.

Respectfully,

Jared Sanchez, Policy Director
CalBike

Sofia Rafikova, Policy Advocate
Coalition for Clean Air

Jonathan Matz, California Senior Policy Manager
Safe Routes Partnership

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