August 17, 2026

Tanisha Taylor
Executive Director
California Transportation Commission
1120 N Street MS 52
Sacramento, CA 95814

Re: Recommendations for draft Cycle 5 Trade Corridor Enhancement Program Guidelines

Dear Executive Director Taylor:

Thank you for the opportunity to comment on the draft guidelines for the fifth cycle of the Trade Corridor Enhancement Program (TCEP).

Our core priority for TCEP is that the Commission allocate its considerable resources to projects that reduce the impacts of the freight system on those who are most burdened by diesel pollution and truck traffic.

The Charge Ahead Campaign and the undersigned organizations appreciate the Commission's engagement with community stakeholders and advocacy organizations. We appreciate your team's openness to input, and commend the thoughtful updates already incorporated into the most recent set of guidelines, for example, the enhanced evaluation guidance for applicants within the Community Impact Factors related to community engagement.

We are also acutely aware of the harmful impacts of freeway expansion projects that put significantly more truck traffic in communities of color and low-income communities, which often bear the brunt of air pollution. We appreciate staff prioritizing projects with sustainable freight elements that align with the California Sustainable Freight Action Plan, the 2023 California Freight Mobility Plan, and the California State Rail Plan to promote healthy communities and sustainability within our communities. In addition to air quality impacts that lead to adverse health outcomes and sometimes even shortened life-spans, freeway expansion in environmental justice communities often lead to the demolition of housing and displacement of long-term residents, noise pollution, traffic congestion and other adverse impacts. While job creation in frontline communities is imperative, we believe those jobs created should be sustainable jobs on projects that advance equity, inclusion, diversity of transportation options (including active transportation options and zero-emission vehicle options), environmental protection and meeting our state's climate goals.

We strongly appreciate the CTC's staff willingness to meet with us, discuss, and incorporate our recommendations from our January letter into the cycle 5 TCEP Guidelines. While many of our workforce development, ZEV infrastructure, and equity recommendations were included in the draft guidelines, we have a few outstanding and additional recommendations that have come up through these discussions that we propose for your further consideration.

Eligible Projects

1. **We request that the guidelines explicitly or functionally exclude general purpose travel lanes in major urban areas as an eligible expense using TCEP funds, as this category of investment is demonstrated not to improve freight travel times**. By contrast, truck-only lanes, managed lane conversions, and rail infrastructure and capacity investments each have the potential to improve both travel time and goods throughput. Published Caltrans and Office of Planning and Research guidance, based on the most robust available academic literature, find that this category of highway investment has a demand elasticity of 1—and by implication, that these investments will fail to reduce traffic and therefore fail to reduce travel times for all vehicles, including but not limited to

trucks. There is no longer a place in the state's investment portfolio for general purpose lanes in major urban areas.

   a. For example—consider an existing three-lane [per-direction] highway segment with no managed lanes in a major urban area. Adding a fourth general purpose lane will, within 3-5 years of project completion, increase throughput by a third while travel times remain roughly flat, at a tremendous capital cost, at least in the hundreds of millions of dollars. By contrast, a managed lane conversion project for one of the three existing travel lanes could achieve the same throughput improvement while significantly and sustainably reducing travel times along the corridor—at significantly lower capital cost and while generating stable revenues that can be reinvested in transportation system maintenance or alternative travel options.

2. **We strongly appreciate the addition of new language related to the CAPTI 2.0 Action and urge the Guidelines to include clarifying language to ensure that ZEV projects continue to be highly competitive under the new scoring system.** We support the new guidelines language to prioritize projects that fully mitigate their VMT impacts and appreciate the robust examples of possible mitigation measures, including active transportation, complete streets, and investments in bus and rail transit service.
   a. We urge the guidelines to also include micromobility and road diets as additional examples of applicable VMT mitigation strategies, and to provide a link to the recently updated Caltrans VMT Mitigation Playbook so that project developers have up to date information on how to mitigate VMT impacts.
   b. While we support projects that fully mitigate their impacts, we also strongly support ZEV projects which already provide clean air and greenhouse gas (GHG) emission reduction benefits, and thus, have no need to mitigate their impacts. To ensure that these types of projects continue to be prioritized, we urge for additional clarification language to confirm that projects that do not have VMT impacts score highly compared to projects that do.
3. **We appreciate the inclusion of the new ZEV Appendix in the TCEP Guidelines, which addresses some of our recommendations regarding providing ZEV project best practice information.** Prospective project sponsors and freight industry stakeholders are actively seeking to understand their role in the ZEV transition, with important questions about the role of local governments in a complex ecosystem of public and private goods movement stakeholders. In particular, we request that the TCEP Guidelines provide more examples of eligible ZEV project types to give local agencies as much confidence

as possible regarding fundable projects and the role(s) that project sponsors of various types can play in fostering ZEV infrastructure investment. For example, highlighting the variety of different approaches that project sponsors can take—building ZEV infrastructure on property owned by the project sponsor or State of California, partnering with freight rail entities to electrify rail, or partnering with ports or heavy-duty fleet operators to build ZEV infrastructure. In consultation with Caltrans, the California Energy Commission, California Air Resources Board, and any other identified stakeholders, CTC should also provide and/or link to documented examples of prior TCEP-funded ZEV projects and other relevant 'best practice'-style resources similar to the Tools section of Other Project Information Areas. These could include, for example, resources to help identify and prioritize among the most beneficial and sufficiently 'energized' locations in which to install ZEV infrastructure, or examples of the public and agency benefits that can be derived from ZEV infrastructure partnerships (e.g., pollution reduction, economic development, or new public or community benefits revenue through charging revenue-sharing agreements).

Screening Criteria

4. **We recommend TCEP administrators integrate an added transparency and engagement step by requiring projects initially screened by the Commission to be uploaded to the public Caltrans Engagement Portal and/or to another public website actually owned and managed by CTC staff.** Making TCEP-funded projects available for comment through this centralized platform would provide stakeholders, including local communities and environmental justice advocates, a clear and accessible opportunity to review and provide feedback on proposed investments. Leveraging an existing, statewide engagement tool would strengthen public trust, support early identification of community concerns or implementation challenges, and help ensure that TCEP investments align with state climate, equity, and goods movement goals while remaining responsive to on-the-ground needs. This action can be executed in several ways, for example:
    a. Uploading all project concepts initially screened by the Commission for public feedback, or
    b. Uploading only projects selected for nomination for public feedback.

Evaluation Criteria

5. **In addition to prioritizing Community Impact Factors, the Commission's evaluation should either:**

   a. Require applicants to use at least one of the updated equity tools (e.g. Caltrans Transportation Equity Index, in the project's planning and development processes in order to receive funding from TCEP, *or*
   b. Rank projects higher that utilize the updated equity tools and demonstrate how the project will use findings to produce equitable outcomes.

6. **We request that the Cycle 5 TCEP (and other applicable programs) guidelines maintain strong, explicit protections for disadvantaged or historically impacted and marginalized communities and demonstrate effort to avoid direct displacement of homes (e.g.projects sited in the highest-scoring CalEnviroScreen tracts, and/or using a similar Caltrans EQI-based criteria)** that currently suffer and remain at risk of harm from CTC-funded investments, a risk that is particularly acute with respect to investments designed to facilitate increased heavy truck traffic.
   a. While the proposed changes to Engagement Criteria require additional information from project developers on how they targeted the local community, including conducting community listening sessions, there is no language checking if those listening sessions were actually accessible for community members. As such, we ask that TCEP guidelines request additional information to understand accessibility, such as whether the listening sessions were held after work hours and provide any financial incentives such as covering transportation or childcare costs.
   b. We also recommend that right-of-way information, especially the potential for acquisition and destruction of homes, be required to be vetted through community engagement for the project and included in project applications. For projects where housing displacement cannot be avoided, agencies should be asked to describe any efforts taken to limit displacement of housing. We recommend that TCEP guidelines require more clear and consistent data to account for how dollars have contributed to the planning, right-of-way acquisition and relocation, or construction of projects that result in displacement.

7. **Require all project sponsors to use consistent methodologies in assessing the vehicle traffic, truck throughput, and pollution impacts of the proposed investments across project submittals.**
   a. Insofar as federal, state, MPO, and/or local funding applications or environmental processes require different modeling assumptions, require project sponsors to include side-by-side comparisons of key modeling assumptions across and outputs across methods. The past discrepancies surrounding the Yolo I-80 and I-15 environmental and planning analyses

are symptomatic of a systemic problem in transportation planning and analysis practice—not unique to California—that can and should be mitigated by ensuring that both project sponsors and any applicable funding and oversight entities clearly understand the intended and foreseeable impacts of any given project. It is not acceptable to make conflicting claims about project impacts simply because one oversight or funding body requires one modeling approach and another body requires a different modeling approach. CTC has a basic responsibility to ensure that staff, commissioners, and all relevant stakeholders receive an honest and transparent accounting of project impacts—an accounting that CTC does not currently require or receive under existing program guidelines.

    b. In order to ensure that future projects are not utilizing multiple travel demand models, we urge CTC to coordinate with Caltrans to update the State Highway System Project Impact Assessment Form to require project developers to confirm that they are relying on a singular travel demand model to estimate VMT and other project impacts across all relevant applications.

8. **Require funding applicants proposing new highway capacity projects in identified environmental justice communities to work with most-impacted community stakeholders to draft a community benefits agreement as a condition of any TCEP funding award.** This approach would significantly strengthen incentives for good-faith community engagement and delivering targeted, meaningful benefits in most-impacted communities—forcing project sponsors to grapple in specific terms with the reality that claims of 'equity' benefits remain too-often at odds with feedback from environmental justice and community-based organizations. The root cause of environmental injustice is a lack of power and agency for residents of environmental justice communities. CTC can share its institutional power with these communities by ensuring they have a seat at the table to guide projects that carry the risk of substantial harm. Additionally, CTC staff should consider holding local workshops in communities that have concerns about a project to ensure that community voices are being captured and considered as part of the project selection process.
9. **Require, as part of Regional Transportation Plan/Sustainable Community Strategy compliance, project applicants to identify how exactly their project will help accomplish the goals stated in the RTP/SCS.** As part of SB 375, MPOs are required to achieve GHG reduction targets set by the California Air Resources Board by developing the Sustainable Communities Strategies (SCS) plan, which describes how the MPO will accomplish its GHG reduction target. While TCEP projects are required to be a part of that planning process by being included within the SCS plan, it is not often clear how the proposed project will

help move the region in the right direction when it comes to achieving its regional climate targets. Thus, we urge the CTC to coordinate with CARB and require TCEP projects to state in their application how their project will advance the goals of the RTP/SCS.

10. **The TCEP Guidelines should specify how the CTC is incorporating the Caltrans System Investment Strategy (CSIS) into the decision-making process.** The CSIS was developed as one of the CAPTI actions by Caltrans to score how well projects adhered to the CAPTI principles in order to guide project nominations. Since its development, the CSIS has been refined multiple times to ensure maximum accuracy and has even been used to access the last cycle of SB 1 projects. However, those scores were released after the CTC had approved the SB 1 applications, which made it unclear whether the CTC was relying on that information to shape its decision-making process. While we are working closely with Caltrans to ensure the scores are released in a timely manner, we would also like to see additional language in the guidelines that explains how the CTC will be incorporating these scores. Additionally, we encourage further collaboration between CTC and Caltrans to ensure the two agencies are relying on the same project information and data for TCEP and CSIS scoring.
11. **We appreciate the inclusion of the additional Workforce Development language.** Our January letter requested that the Cycle 5 TCEP guidelines solicit specific job information on Economic Impacts of projects**.** We believe this was for the most part achieved by adding a new Workforce Development and Outreach section. We strongly urge you to keep this language in the cycle 5 TCEP guidelines and add additional clarifications. For example, we recommend that you consider adding labor unions and state-certified small and diverse businesses as examples of possible project partnerships to help address racial equity in the workforce. Similarly, we ask that the list of communities where workforce outreach was performed includes residents of environmental justice communities. Additionally, we urge section 3 of Part A to only focus on accessing project-created jobs in disadvantaged or low-income communities. The way this section is currently worded implies that having a TCEP project present provides an inherent benefit, whereas TCEP-funded highway projects often lead to air pollution and worse public health outcomes for the community. Finally, while we support this section working to improve job creation estimates, we have some hesitation that having project developers provide these estimates could lead to non-uniform answers. We would urge future cycles to consider having TCEP Guidelines provide job creation estimation calculations and tools that could be used to ensure that all applications rely on the same methodology to provide job estimates.

12. **We request that the Cycle 5 TCEP guidelines indicate in the Project Rating Process that the CTC also gives priority to project proposals from community based organizations and environmental justice organizations submitted by a public agency sponsor.** In CTC's Racial Equity Statement, the Commission states it will "Work to build and strengthen relationships with community-based organizations, non-profits, advocacy organizations, and other equity experts and practitioners," and in order to do this, the CTC must make racial equity real with tangible outcomes by explicitly being clear it will encourage, prioritize, and fund project proposals drafted by community based and environmental justice organizations submitted by public agency sponsors.

Reporting

13. **We request that the CTC require every project to submit a Project Performance Analysis once every 5 years for the following 20 years to ensure that those projects are continuing to support the goals of the program.** Currently, all projects that have a performance-based outcome are required to submit a Project Performance Analysis right after the project has been completed. Yet, there is little oversight as to whether those projects will continue to meet their outcomes in the future as 5-year analyses are only required on an as-needed basis. In order to ensure that projects applying for TCEP funding are accurately predicting their impacts, we request that all funded projects with performance-based outcomes submit additional project performance analyses 5 years after the project completion and continue updating them once every 5 years for the next 20 years after the project completion.

Thank you for your consideration of these comments. We look forward to discussing them further.

Best,

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