



February 23, 2026

Tanisha Taylor
Executive Director
California Transportation Commission (CTC)
1120 N Street MS-52
Sacramento CA 95814

RE: Comments on the 2026 State Transportation Improvement Program

Dear Ms. Taylor,

Thank you for this opportunity to provide feedback on the 2026 State Transportation Improvement Program (STIP). We are encouraged to see so many active transportation, rail, and transit projects being proposed for funding this STIP cycle in both the ITIP and many county RTIPs. At the same time, Caltrans and many counties are continuing to propose highway widening or managed lane projects for funding. Not only are these projects costly, but, contrary to the promises of the project developers, these projects will actually increase congestion in

their region due to the demonstrated phenomenon known as induced demand.¹ Higher traffic levels will lead to more vehicle collisions², higher air pollution levels³, more money being spent on gas, and less time people can spend with their families due to being stuck in traffic.⁴ It also causes significant costs to the state, as more lane miles mean more funding would need to be spent to maintain it.

At the same time, many of the regions proposing such projects have unfunded active transportation projects in their region. During the last Active Transportation Program (ATP) cycle, CTC received almost 300 project applications, most of which have remained unfunded due to the program facing significant funding cuts in that same year. Over 100 of those projects received a score above 80, meaning they were deemed to be very competitive by your CTC staff. These projects, ranging from additional sidewalks, crosswalks, bike lanes, trails, and safe routes to schools, will all improve safety and accessibility in their communities by providing households with cheaper alternatives to driving. A recent NRDC study showed that 35% of Californians have limited access to a vehicle, meaning that more people than previously thought rely on public transit and active transportation to reach their destinations.⁵ Additionally, access to active transportation improves overall health as it encourages people to be more active, helping lower obesity and heart attack rates, thus reducing hospitalization rates.⁶

Given that the CTC has received more programming requests for the STIP program than there is program capacity, we recognize the difficult decision before you to determine which projects will be eligible for funding. However, this also presents an opportunity to uplift and fund projects that are the most cost-effective use of STIP funding and will provide the most benefits to Californians in the long term. Many of California's regions are still struggling to reach the air quality attainment standards required under the Clean Air Act⁷ and GHG emission reduction targets required by SB 375 and SB 32.⁸ Funding of more capacity increasing projects will push regions even further away from meeting these requirements and will also undo any progress being made by the proposed transit and active transportation projects. Additionally, the 2026 STIP guidelines support the prioritization of funding for projects that reduce GHG emissions, stating that "The Commission intends to consider Executive Order B-30-15 and the provisions of SB 32 when approving programming recommendations if programming requests exceed

¹ Things DOTs say: "Expanding the road will definitely reduce congestion" (2023) *Transportation for America*
<https://t4america.org/resource/community-connectors/what-they-mean/induced-demand/>

² The Dangers of Traffic Congestion. *Metropolitan Transportation Commission*
<https://mtc.ca.gov/news/dangers-traffic-congestion>

³ Smog, Soot, and Other Air Pollution from Transportation. *U.S. Environmental Protection Agency*
<https://www.epa.gov/transportation-air-pollution-and-climate-change/smog-soot-and-other-air-pollution-transportation>

⁴ California Transportation by the Numbers. (2018) *TRIP*
https://tripnet.org/wp-content/uploads/2018/08/CA_Transportation_by_the_Numbers_TRIP_Report_Aug_2018.pdf

⁵ Lehman A. & Henningson S. (2025) Who Doesn't Have a Car? *Natural Resources Defense Council*
<https://www.nrdc.org/resources/who-doesnt-have-car>

⁶ Active Transportation, Parks and Public Health. *National Recreation and Park Association*
<https://www.nrpa.org/contentassets/4db5df14a30e49ef853101af360cf1a1/active-transportation-parks-public-health.pdf>

⁷ Current Nonattainment Counties for All Criteria Pollutants. (2023) *U.S. Environmental Protection Agency*.
<https://www3.epa.gov/airquality/greenbook/ancl.html>

⁸ SB 150 Dashboard (2024) *California Air Resources Board*
<https://www2.arb.ca.gov/our-work/programs/sustainable-communities-program/sb-150-dashboard-tracking-progress-sustainable>

programming capacity.” For these reasons, we urge the CTC to consider our recommendations below not to fund GHG-increasing highway widening projects, especially in regions that have plenty of unfunded ATP projects that would benefit those regions instead.

To guide your decision-making, we have identified a number of counties wherein STIP funds could be more appropriately spent on projects that promote safety, accessibility, and sustainability. Doing so would allow for \$30M in savings and bring the programming of funding in alignment with available funding capacity:

Imperial County

Imperial County is requesting \$10.8M in their 2026 RTIP, most of which will go toward the Forrester Road Improvement Project, which proposes to turn Forrester Road from a 2-lane road into a 4-lane Expressway. At the same time, Imperial County submitted five ATP project proposals, only one of which was funded through the MPO component. We recommend that the CTC staff only approve the Imperial County RTIP if the county agrees to replace the Forrester Road Improvement Project with the Holton Interurban Bikeway Project, which would also save \$8.3M in STIP funding.

Kern County

Kern County is requesting \$26M in their 2026 RTIP, most of which goes toward funding an additional truck climbing lane on State Route 58. By increasing the number of trucks on the corridor, this project will further worsen the poor air quality in the region as medium and heavy-duty vehicles generate 59% of ozone pollution and 55% of particulate matter pollution generated by mobile sources.⁹ Additionally, the project will most likely still lead to an increase in congestion on that corridor, especially since truck climbing lanes are not typically enforced to exclude light-duty vehicles from using them.¹⁰ At the same time, the City of Bakersfield has requested \$25M in ATP funding to construct active transportation improvements along the Monitor Street corridor. Residents of Bakersfield have long complained about the lack of shade and high collision rates along that corridor, especially important given the corridor’s proximity to nine schools.¹¹ This project received a score of 89 on its ATP application but was not funded. For these reasons, we request that the CTC reject the Kern County RTIP and direct Kern County to amend its RTIP to replace the Truck Climbing Lane Phase 2 project with the Monitor Street ATP project, which would also reduce STIP programming demand by \$39,000.

⁹ Delivering Clean Air: Health Benefits of Zero-Emission Trucks and Electricity (2022) *American Lung Association* <https://www.lung.org/getmedia/e1ff935b-a935-4f49-91e5-151f1e643124/zero-emission-truck-report>

¹⁰ Truck-Only Lanes. *Caltrans* <https://dot.ca.gov/programs/traffic-operations/legal-truck-access/truck-only-lanes>

¹¹ Rodgers, V. (2023) Community weighs in on changes they’d like to see along the Monitor St corridor. *Kern Sol News*

<https://southkernsol.org/2023/12/07/community-weighs-in-on-changes-theyd-like-to-see-along-the-monitor-st-corridor/>

Orange County

While Orange County is requesting funding for a number of new rail, transit, and active transportation projects, it is also looking to fund the I-5 Managed Lanes Project. This project proposes to add at least one HOV lane in each direction, which will induce traffic in that corridor, as additional managed lanes increase traffic just as much as general purpose lanes. This project will pull riders off the parallel Metrolink and Amtrak rail services, and undermine any progress the other active transportation, transit, and rail projects will have on improving air quality and reducing GHG emissions in the region; as such, it is not a cost-effective use of RTIP funds. Instead, we recommend that the funding be used to fund at least one of the numerous safe routes to school projects in Orange County that applied for ATP funding last year but were unable to receive it. Safe Routes to School projects provide significant benefits to their community by ensuring that children are safe walking to and from school, which in turn improves their health, and also reduces local congestion as parents are no longer required to drive their children to school.¹² We strongly recommend that the CTC reject the Orange County RTIP and recommend that the I-5 Managed Lanes Project be replaced with the Monroe Elementary and Edison Elementary SRTS Project, which would also reduce the STIP programming demand by \$1.4M.

Riverside County

We recommend that the CTC reject the Riverside RTIP due to the proposal including a request for \$55M for the Route 15 Express Lanes project, which would build an additional 16 miles of express lanes. In their environmental documents, the developers admit that this project is inconsistent with the GHG reduction targets under SB 32 since the GHG emissions are projected to increase once the project has been built. Building this project will further push this region out of alignment with SB 375 and the Clean Air Act due to significant increases in congestion, air pollution, and GHG emissions. Instead of funding the Express Lanes project, Riverside County could elect to fund any of the 12 projects that applied for ATP funding in their region but received none despite scoring above 70 on their applications. In particular, we recommend that this funding be instead directed toward the City of Banning Downtown Active Transportation Improvement Project, Pedley Elementary School Pedestrian Improvements, Galena Street Improvement Project, and the Improvement of Trail Network Connectivity Project, which would not only improve air quality and reduce GHG emissions in the region, but would also save \$380,000 in programming demand.

San Joaquin County

San Joaquin County is proposing to fund two capacity-increasing projects within its RTIP. The State Route 99/120 Connector Project would widen the connector ramp to two lanes and would add an additional merge lane. While the project claims to improve safety, the additional lanes are likely to contribute to increasing the rate of collisions as more cars are able to travel through

¹² Safe Routes to School (SRTS) *Centers for Disease Control and Prevention*
https://archive.cdc.gov/www_cdc_gov/policy/hi5/saferoutes/index.html

the corridor. Similarly, the I-205 Managed Lanes Project is proposing to widen I-205 to add HOV or express lanes. While the project is still considering which alternative to implement, the major proposed alternatives are expected to increase both GHG and air pollution emissions due to higher levels of traffic.

Instead of investing tax-payer dollars to projects that will increase collision rate and GHG emissions, San Joaquin County should invest in projects that improve safety, accessibility, and air quality. San Joaquin only saw one project funded in the last ATP cycle despite submitting 10 projects suggesting active transportation improvements all across the region. Funding proposed for both widening projects could be used to fund four active transportation projects, which all scored above 85 on their ATP applications. These projects would install complete street elements and improve walkability and bikeability across the cities of Stockton and Lathrop. Thus, we recommend that the CTC reject the San Joaquin RTIP and direct the county to fund Main and Market Complete Streets Phase II, Downtown Walkability and Bikeability, East Lathrop Bicycle and Pedestrian Enhancements, and Boggs Tract Sustainable Transportation Improvements Projects. These changes would also help reduce STIP demand by \$8.4M.

San Luis Obispo County

San Luis Obispo is proposing to fund multiple widening projects using its STIP funding. These projects, including the State Route 46 Antelope Grade Corridor Improvements Project, U.S. 101 NB Off-ramp and SR 46 East Project, and the U.S. 101/Prado Road Interchange Project, will all increase lane capacity in the region, leading to higher GHG and air pollution levels. Additionally, the State Route 46 Antelope Grade Corridor Improvements Project was already rejected by the CTC staff from receiving TCEP funding, meaning this project was found to not be competitive for state funding. Instead, the funding from these highway projects could go towards funding the SLOCOG Safe Routes for All Project, which would improve safety and connectivity in the region, and would save \$1.4M in STIP funding.

San Mateo County

The San Mateo 101 Managed Lanes Project North of I-380 is requesting \$16.8M to build a managed lane in each direction along the U.S. 101. At the same time, San Mateo submitted 3 projects for the last cycle of ATP funding, and were unable to see any of them funded. We would recommend that the 101 Managed Lanes Project be replaced by the Kelly Avenue Complete Streets Project, which would also save \$5.5M in STIP funding.

Santa Clara County

While Santa Clara's US 101 Express Lanes Project proposes to convert existing lanes into express lanes, which would help reduce VMT and GHG along the corridor, the project also proposes to add a second express lane in both directions, which would undo any progress the other component would achieve. This region also saw not a single ATP project funded in their

region last cycle, despite submitting five applications. In order to ensure that the region continues to progress steadily towards meeting its GHG reduction targets, we recommend that the US 101 Express Lanes Project be substituted with the Milpitas Citywide Safe Routes to School Improvements Project and the Pruneridge Avenue Bicycle and Pedestrian Improvements Project, which would also save \$4.1M in STIP funding.

Thank you for considering our recommendations. We look forward to working closely with the CTC staff to create the most benefits for our state, our communities, and our environment through careful STIP spending.

Sincerely,

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