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April 17, 2015

File Number 3100400

Mr. Gabriel Corley, California Transportation Plan Project Manager
 Division of Planning, Mail Stop 32
 California Department of Transportation
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MEMBER AGENCIES

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Dear Mr. Corley:

SUBJECT: Draft California Transportation Plan 2040

The San Diego Association of Governments (SANDAG) appreciates the opportunity to comment on the draft California Transportation Plan (CTP) 2040. We appreciate the establishment of the comprehensive Policy Advisory Committee that was utilized to assist in the development of the draft CTP 2040. The collaborative process, which included a number of Metropolitan Planning Organizations and state agencies, helped to develop a comprehensive plan that is well written and contains a great deal of valuable information. We also recognize that the draft plan highlights the importance of all modes of transportation in helping to move goods and people.

In addition to the sentiments discussed in the letter submitted by the California Association of Councils of Governments on April 17, 2015, we have some comments which relate more specifically to the San Diego region, and our binational region.

International Ports of Entry and Goods Movement

The international border with Mexico plays an importation role in the state economy and in travel within the San Diego and Imperial County regions. Similar to the CTP 2040's discussion on seaports, we believe there should be a section for Land Ports of Entry (POEs), which would highlight all of the commercial land POEs that move goods via truck and/or rail. We also ask that Caltrans consider the use of the United States Department of Transportation Bureau of Transportation Statistics data for trucks or truckloads and/or trade value for these POEs.

High Speed Rail

In regards to the future High-Speed Rail (HSR) system, we would like to see the CTP 2040 address the Phase 2 HSR corridors. Phase 2 is briefly mentioned in the California HSR Authority Business Plan and only focuses on the implementation of Phase 1, which will be complete in 2028. It is reasonable to assume Phase 2 could be built by 2040. We would like to request that the CTP 2040 include Phase 2 of the HSR system in Alternative 1 or, at a minimum, in Alternative 2.

Lastly, while reviewing the draft CTP 2040, we came across some technical details that may warrant modification or further review. These are enclosed for your review.

Thank you for the opportunity to comment on the draft CTP 2040. If you have any questions regarding these comments, please contact me at (619) 699-6945 or muggs.stoll@sandag.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charles Stoll', with a large, stylized flourish at the end.

CHARLES "MUGGS" STOLL
Director of Land Use and Transportation Planning

MST/RKE/bga

Enclosure: 1. Draft California Transportation Plan 2040 – SANDAG Technical Comments

Draft California Transportation Plan 2040 – SANDAG Technical Comments

Goods Movement

Pg. 19: What is the source of the \$378 billion in freight revenues? And is this for freight rail only and only within California?

Pg. 19: As a comparative measure during 2014, total Class I freight rail revenue nationally was \$93 billion from all seven Class I rail operators and is quickly attainable from the Securities and Exchange Commission. Also, Class I rail operators do not contain operating budgets, but rather generate revenue from services provided. The proper correlation would be rail freight revenue rivaling statewide budgets.

Pg. 19: "With California freight revenues in 2009 of more than \$378 billion; operating budgets for California's Class I (line haul freight) railroads rival budgets for many other states' departments of transportation." This statement would be suggesting other modal freight revenue.

Pg. 20: Consider using the American Association of Port Authorities recent 2013 information. Oakland now ranks sixth in the nation based on TEUs. Also, according to the World Shipping Council and as of 2013, Los Angeles/Long Beach rank 19th and 21st globally. Combining them would place them as the ninth highest for TEUs.

Pg. 21: Consider using the 9th Edition Dictionary of International Trade definition: "A measure of a shipping container's capacity using a standard 20-foot international ocean shipping container as a measuring unit."

Pg. 29: Consider the statements from the American Trucking Associations: "Nearly 70 percent of all the freight tonnage moved in the U.S. goes on trucks." "Motor carriers collected \$604 billion in revenues, or about 81 percent of total revenue earned by all domestic transport modes." First statement is more recent, second is from 2011.

Pg. 29: Suggest a more concise reference to capacity issues, such as, "... as seaports and land ports struggle with limited operational footprints, and land use pressures from surrounding communities." This sentence would be followed by the separate thought and sentence related to truck parking at rest areas.

Pg. 29: "Freight movement contributes to traffic congestion, traffic accidents, roadway wear-and-tear, climate change, and health issues." Consider restating as follows: "Freight movement, similar to the movement of people via passenger vehicles and transit, contributes to traffic congestion....."

Pg. 30: "The need to improve the freight network is imminent, as ports from Canada, Mexico, East Coast, and the Gulf Coast have increased their import value." Consider restating as follows: "The need to improve the freight network is imminent, as land ports of entry from Canada and Mexico, as well as other seaports on the East Coast and the Gulf Coast have increased..."

Pg. 30: Table 10 - Freight Forecast and Trends: "Domestic and International outbound shipments from CA will grow faster than inbound shipments." According to Freight Analysis Framework, this statement is true for international, but not for domestic. Domestic outbound is projected to increase 37 percent, while inbound is projected to increase 39 percent. Consider rephrasing as follows: "International export shipments from CA will grow faster than imports, while domestic inbound and outbound shipments will grow at a similar pace."

Pg. 30: Table 10 - Freight Forecast and Trends: "Total shipments by weight (into, out of, and within CA) are projected to grow approx. 180% statewide between 2012 and 2040." The SANDAG Freight Gateway Study Update utilizes the Freight Analysis Framework (FAF) Version 3.5 Tool. Considering the time period for the state of California, the total growth would be 55 percent according to FAF. This is most likely due to the fact that in FAF domestic inbound, outbound, and internal is projected to grow near 1 percent per year; these moves by tonnage are highly substantial when compared to exports/imports. Lastly, please use tonnage rather than "weight."

Pg. 52: The ITIP should be characterized as being not just for region-to-region transportation, but for corridors of statewide significance as well, including freight corridors.

Pg. 59: Consider adding more on the importance of freight in G1.

Pg. 67: Consider adding that California is working with the federal government to develop a national freight investment policy.

Pg. 123: Use tonnage rather than "weight." See previous comment regarding 180 percent growth. We think this total growth over the time period is overstated.

High Speed Rail and Intercity Rail

Pg. 53: The Pacific Surfliner and San Joaquin intercity rail services will soon be managed by local joint power agreements similar to the Capitol Corridor.

Pg. 53: Intercity Rail – there should be some reference to the transition of operations from Caltrans to the joint power agreement for the Pacific Surfliner to San Diego that will be effective at the end of June 2015.

Pg. 93: Alternative 2 should include the full build out of the state's High-speed Rail system with connections to Sacramento and San Diego to achieve maximum greenhouse gas reductions.

Pg. 125: Bullet point "Expand High-Speed Rail" – Please elaborate. Is this beyond the Sacramento to San Diego route?

Public Health

Pg. 35: People who live in neighborhoods with sidewalks on most streets are 47 percent more likely to be active at least 30 minutes a day. Public transit users take 30 percent more

steps per day than people who rely on cars. From Active Living Research www.activelivingresearch.org

Pg. 35: Medians, roundabouts, and other traffic-calming efforts can reduce the number of automobile crashes with pedestrian injuries by up to 15 percent (from Active Living Research www.activelivingresearch.org). Economic Benefit: Roundabouts were installed on La Jolla Boulevard in Bird Rock and found that sales tax receipts had increased 21 percent as there's been a dramatic increase in the number of people now walking across the boulevard (from a Walk San Diego study).

Pg. 36: At times, air emissions from traffic become a concern for siting new recreational facilities, such as a trail alongside a freeway, or a neighborhood park served by a busy arterial road. In general, the health benefits of physical activity usually far outweigh the risks from ambient air pollution. Guidelines from the federal Centers for Disease Control and Prevention state that, except for sensitive populations with chronic lung conditions, physical activity should be avoided entirely only under the worst air quality conditions, which rarely occur in the San Diego region. For recreational facilities, emissions from point sources such as roadways should be minimized to the extent possible, but short duration exposures typical of park or trail use do not warrant avoiding such physical activity opportunities except for sensitive populations. United States Center for Disease Control and Prevention, Air Quality and Outdoor Activity Guidance for Schools www.cdc.gov/nceh/airpollution/airquality/pdfs/Air_Quality_and_Outdoor_Activity_Guidance.pdf (Accessed October 21, 2013).

Native American Transportation

Pg. 15: Rincon Band of Luiseño Indians.

Pg. 39: The discussion about tribal sovereignty is not very clear. Federally recognized tribal nations are 'domestic dependent nations' with sovereignty over their land and peoples, but subject to federal law. The discussion about being California citizens seems off topic. Native Americans are United States citizens and if they are enrolled in a tribe they are dual citizens of the tribe and the United States. States do not confer citizenship. The subject is tribes as land use authorities whose needs must be met according to federal and state law in terms of transportation. As minorities, their individual needs must be met to comply with Title VI.

Pg. 40: The SANDAG Working Group is named, 'Interagency Technical Working Group on Tribal Transportation Issues'.

Pg. 42: "Tribal gaming has become a popular way to generate revenue and job opportunities..." Perhaps, another way to say this is, "With the passage of the Tribal Compacts, through the Indian Gaming Regulation Act (IGRA), many tribes in California signed contracts with the state and have pursued gaming as an economic development strategy for their nations."

Technical comments/corrections:

Pg. 3: Nunez is spelled Núñez

Pg. 4: "Eliminate all emissive vehicles from California roads, and replace them with zero-to near-zero-emissions vehicles (road, rail, transit and air) throughout the State..." You might want to soften this a bit or at least mention that there is significant discussion among stakeholders about near-zero emission commercial vehicles.

Pg. 9: Needs parenthesis around 'ARB.'

Pg. 9: The paragraph starting with, "Unlike their regional counterparts..." is confusing. Does it mean that Regional Transportation Planning Agencies don't have to develop an Sustainable Community Strategy, but Metropolitan Planning Organizations do? If so, there might be a more clear way to state this.

Pg. 19: The document contained in Footnote 6 has the same statement without a direct source to the freight revenue.

Pg. 21: Bike/Pedestrian section - Table 6: (a) Please specify in the title if this mode share is for all trips or commute trips; (b) Please specify in the Source that this data is from the 2013 California Household Travel Survey, if that is where it's from.

Pg. 27: Please reflect the SANDAG transit expenditures too, in addition to Sothern California Association of Governments and Metropolitan Transit Commission.

Pg. 28: Greenhouse Gas emissions (GHG) linked to global warming and climate change are the most significant threat confronting public health in the 21st century. G Benjamin, C Wilson, P Sheffield, KL Ebi. Briefing on Health, Climate Change and EPA Safeguards. Washington, DC: American Public Health Association; 2011.

Pg. 31: Fuel, Energy, and Technologies section: left column is cut off. Incomplete sentence (unless it's hidden by the picture).

Pg. 29: Consider adding a reference to cap-and-trade funds/programs in addition to ATP.

Pg. 36: Housing and Land Use section: Would suggest referencing suburban land use patterns and associated transportation networks versus "historic land use practices."

Pg. 36: Housing and Land Use section: Not just about the loss of redevelopment agencies, but also about the loss of tax increment financing as a major revenue source for affordable housing.

Pg. 44: 2nd paragraph, should update Needs Assessment from 2011 to 2014.

Pg. 45: Reference to MAP-21 should also note it was extended to May 2015.

Pg. 52: The SHOPP is the State Highway Operation and Protection Program, not Plan. The SHOPP paragraph was cut off. It should mention how little funding has gone to operations in the past ten years.

Pg. 56: Reference to DMV being responsible for implementing SB 1077 is incorrect. Road Usage Charge Pilot Program mandates the formation of a Technical Advisory Committee to

study alternatives to the gas tax in 2015 and make a recommendation for the pilot program to the legislature by January 2016. CalSTA must implement the pilot program by January 1, 2017.

Pg. 59: This is a Caltrans Headquarters' effort for considering the next ICM corridors which is a positive step to support this specific goal – G1. However, there is no mention or emphasis to support this activity as a key near or midterm strategy recommendation.

Pg. 59: Recommendation on Pg. 122 is inconsistent with this statement (avoid funding capacity expansions ...)

Pg. 60: "California's Mileage Based Pricing Strategy" call-out box: Not clear why this is included as insert under this section.

Pg. 61: CSMPs served as foundational effort for us and paved the way for a number of studies; however, they require significant resources and thus should the State continue to promote these plans, commitment should also be expressed as part of near-midterm recommendation strategies.

Pgs. 67-68: It would be helpful to have an introductory paragraph for the performance measures. As previously noted the measures identified in the SGC effort are monitoring measures and some of them cannot be modeled to predict transportation network performance in the future.

Pg. 74: G5 (Goal 5) Please consider this goal to be more about equal access.

Pg. 76: UrbanFootprint box: This reference is OK, but SANDAG is not actively using Urban Footprint.

Pg. 76: Please clarify the three E's (Equity, Environment, and Economy) are the three pillars of sustainability.

Pg. 76: The second paragraph in the right column: "By engaging the public early.....decisions **will be** made that better reflect a community's values...." Please consider changing the phrase, "will be," to "may be," as it sounds more realistic.

Pg. 92: Definition of carshare is not accurate: *Carsharing allows people to rent cars for a period of time extending from as little as 30 minutes, up to a full week....* Most carshare programs allow members to pay for service by the minute (no minimum) but very few allow for more than a full day rental.

- A more accurate definition of carshare: "Carshare is a community-based transportation service that allows members to access an automobile on an as needed basis without the cost and responsibility of vehicle ownership."

Pg. 99: Figure 10. Change in Daily VMT by Alternative Relative to 2010 (CSTDm): Should read 2040 Alts 2 and 3, instead of "2020 Alts 2 & 3"

Pg. 100: Figure 11. Personal Travel Per Capita VMT (CSTDM): Should read 2040 Alt 2, instead of "2020 Alt 2"

Pg. 101: Greenhouse Gas Emissions section: Is it possible for Caltrans to estimate current (2010 or 2014) emissions to compare to 1990 emissions to assess whether 2020 emissions would be higher or lower than what AB 32 requires? This result would influence the magnitude of the reductions needed by 2050.

Pg. 110: Sustainability section: Suggest adding affordable housing in this paragraph.

Pg. 113: Recommendations, Short-range section, first bullet point: Please clarify this recommendation.

Pg. 114: Within "Address Climate Adaptation..." This section describes many strategies for dealing with Sea Level Rise, but it should also address other climate impacts, such as wildfire, drought, heat waves, etc.

Pg. 114: 4th bullet of 2nd column: "Track sea level rise and other climate change indicators such as via interactive maps and modeling that identify transportation infrastructure that could be vulnerable to environmental and climate changes."

Pg. 115: "Fund and expand Active Transportation programs that promote carpooling, transit, walking and bicycling and other active modes of transportation"

- Carpooling and transit are not considered active transportation. This could be changed to "Fund and expand programs that promote transportation alternatives such as carpooling, vanpooling, transit, walking, and bicycling"

Pg. 116: Typo in "Expand..." header, it should be "Transit."

Pg. 117: The transit recommendations should also include support for the technologies that increase convenience and competitiveness of public transit thereby creating a more positive attitude towards public transit for choice riders. This includes real-time transit information and trip planning tools and universal payment system as well as improved connections to transit (i.e., mobility hubs)

Pg. 118: "Create new transportation demand management strategies that improve travel efficiency"

- This recommendation is too vague. How is travel efficiency defined? Is this efficiency for all modes or specific modes?

Pg. 121: "TDM strategies must be incorporated into general planning"

- This recommendation could go one step further and recommend incorporating TDM into the development review process to ensure implementation of TDM policies and plans.

Pg. 123: Delete the "Mid To Long-Range" section because it is a duplicate.

Pg. 123: Please consider adding "continue working with stakeholders throughout the process"

Comments on the Focus Group Report:

Pg. 15: Some weight should be given to the responses from the various focus groups, based on population of the region of origin of the focus group. This would provide a more complete picture of what the priorities of the population at large are and what they would support in terms of policy and funding. Example: On Question 6, the results show that "Adding bicycle/ped facilities, public transit..." is by far the highest transportation improvement. However, this is driven by the responses from Eureka, Redding, and Palm Springs, representing some of the most sparsely populated areas in the state. If policy/funding proposals were based strictly on this response, its likelihood of success is doubtful since it is not uniformly supported to that large degree by the larger urban areas in Los Angeles, or the Bay Area.