



Bay Area CMA Directors

July 10, 2015

Gabriel Corley,
CTP 2040 Project Manager Division of Planning, MS---32
California Department of Transportation
P.O. Box 942874
Sacramento, CA
94274---0001

RE: Comments from the Bay Area CMAs on the Draft California Transportation Plan 2040

Dear Mr. Corley:

The Congestion Management Agencies (CMAs) for the nine Bay Area counties (Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano and Sonoma) are pleased to offer the following comments on the California Transportation Plan 2040 (CTP 2040). While there are many elements of the draft plan that help move towards the important goal of reducing greenhouse gas (GHG) emissions as well as improving mobility and transportation in California, there are other elements with which we are concerned. It is in the spirit of helping to achieve all of these goals that we offer the following comments.

A. GENERAL POLICY COMMENTS

1. CTP 2040 is different from the Sustainable Communities Strategies (SCS), but May Still Influence Them

The Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) have developed a SCS in partnership with the Bay Area CMAs, as required by SB 375. This SCS balances the various state priorities of GHG reduction, production of adequate housing, supporting goods movement as a cornerstone of a vital economy, addressing sea level rise and advancing social equity. Other regions have also adopted SCS documents.

The description of the relationship between SCSs and CTP 2040 on Page 9 is insufficient. This discussion should make the following points so that the public will understand why some things may be included in the CTP 2040 that are difficult to include in an SCS.

- The SCS is a fiscally constrained document, meaning that it cannot include more projects and programs than what could reasonably be expected from realistic revenue forecasts.
- In non---attainment areas, RTPs (including all of its forecasts relating to revenue, population, job growth, and development), must be reviewed by the U.S Environmental Protection Agency for reasonableness, which assures consistency with air quality conformity requirements.

- In Metropolitan Planning Organization locations such as the Bay Area, the plans are further reviewed to determine whether they will achieve a GHG reduction target established by CARB.
- All SCSs are subject to the California Environmental Quality Act.
- SCSs have a defined impact on funding programs: expenditures in transportation improvement programs (TIPs) and the annual overall work program (OWP) must be consistent with the SCS.

None of these constraints apply to the CTP 2040. Instead, CTP 2040 is an aspirational document. As such, it may include goals and assumptions that cannot be included in an SCS. As pointed out in the letter by the Riverside County Transportation Commission, the CTP 2040 plan includes ambitious assumptions that include road pricing, transit service, and bus rapid transit that may – or may not – be consistent with the requirement for reasonable foreseeable revenues that apply to a SCS. Further analysis in the CTP 2040 shows that the transportation sector will not achieve GHG reduction goals without applying the plan’s most aggressive recommendations, including an assumption that nearly all cars and trucks will become zero emission vehicles.

Many of the assumptions in the CTP 2040 would not be permissible in a regional SCS for two reasons:

- First, the regional agency would have to show realistic funding sources that could be used to implement the strategies. As the Funding Chapter of CTP 2040 documents, it is unrealistic to believe that all of the strategies could be achieved in a fiscally constrained plan.
- Second, many of the assumptions (road pricing, transit, and electric vehicle) would be rejected in a conformity analysis. We would expect the US EPA would require the region to revise the forecasted result to something more certain to assure that appropriate policies were in place to protect air quality.

The CTP 2040 serves a parallel but very different purpose to a SCS. It is a visionary document that need not be grounded in reasonably-projected reality, but it challenges us to change what can be considered reasonably expected. Such documents are important to developing policy, but given the relationship between the two documents and the potential for public confusion in their comparison, the CTP 2040 should take the time to describe this relationship more clearly. The Bay Area CMAs gladly join with the California Association of Councils of Government (CalCOG) MTC, ABAG and other regional agency staff to assist in drafting this language to assure that the roles of the two documents are clear. It is important that CTP 2040 clearly state that the language in the CTP 2040 will not impose additional mandates on a SCS.

2. Partnership with and at the Local and Regional Governments

Local and regional partnerships are key to actually implementing projects and programs. These relationships take time and work to develop and maintain. The CTP 2040 should clearly embrace the existing partnerships between local and regional government. The California Air Resources Board does this by specifically recognized local and regional governments in the Scoping Plan as “essential partners” in the achievement of the AB 32 goals. CTP 2040’s recognition of these relationships is inconsistent.

For example, CTP 2040 raises several issues that are not within the Department's direct authority. While it is appropriate for the plan to note these relationships, it should frame policies in a way that recognizes the agency's authority (state, regional, or local) that has primary responsibility. An example of this is the recommendation in the first column on page 111 to "*promote efficient infill housing development and redevelopment opportunities to reduce urban sprawl.*" The recommendation does not acknowledge that land use authority rests with local governments and that the Department must partner with them in order to achieve the goal. It also does not recognize other responsibilities that local governments have, such as providing basic services such as police and fire protection, that also influence land use decisions. This lack of recognition of local needs and responsibilities harms the ability to establish and maintain partnerships.

The CTP 2040 does also contains helpful language. The policy immediately to the right of the above example, in the second column on page 111, recommends that the Department "*work with local and regional agencies to apply considerations of health, equity, and sustainability to transportation decision--making.*" This is a better statement of what is needed and will focus the Department's efforts to build a working partnership with the appropriate lead agency.

Phrasing that respects the authority, and recognizes the needs, of other agencies should be applied consistently throughout the document. Accordingly, all the goals and policies should be reviewed to determine whether the overlapping partnerships that the Department has with fellow agencies and local and regional governments are identified. Having the direction at the outset to cooperate with appropriate partners should greatly improve the success for all involved.

3. Road Capacity May Be An Appropriate Investment in Some Circumstances

We share the reaction of CALCOG in being taken aback at the breadth of the recommendation on page 122 to "*avoid funding projects that add road capacity and increased maintenance costs.*" It is appropriate to consider the impacts of increased capacity and maintenance costs of a project, but "avoid" goes much too far on a statewide basis. While the Bay Area SCS generally attempts to avoid capacity-increasing projects, it and local agency plans, recognize there are some locations where new capacity is appropriate.

Many good projects that are consistent with the plan's goals will be capacity increasing: the Bay Area Express Lane Network anticipates increasing capacity to fund the additional lane, although it recognizes that there may be some areas where conversion of a mixed-flow lane is more appropriate. Goods movement projects may increase road capacity by addressing critical freight needs, and can also help alleviate congestion that leads to emission of other dangerous pollutants such as PM 2.5 in communities of concern. Interchange reconfigurations, may also be categorized as capacity increasing yet address safety and operational issues. Autonomous vehicle investment may increase the capacity and maintenance costs of the current network by allowing more cars to drive on the same roadway more efficiently. Is the intention for CTP 2040 to limit capacity increasing projects in all these instances?

Individual road enhancing projects may induce some travel, but they can be accommodated within the overall goal of reducing GHG system-wide. As California continues to grow, there will be instances when other goals, such as safety and mobility, suggest that some capacity increasing projects should proceed. A better approach, which conflicts with the language above, can be found on page 59: which acknowledges that "*investments are needed for capacity enhancements, and to manage the system and demand efficiently, provide viable transportation choices, and increase connectivity among all modes.*" The language on Page 122 should be amended to reflect the intent on Page 59.

4. Measuring Performance Metrics Will Need Financial Support.

The performance framework used for CTP 2040 recognizes the benefits associated with building upon the well-vetted set of performance measures drafted by SANDAG (MTC's equivalent in the San Diego area) for the Strategic Growth Council. In particular, the inclusion of measures related to non-auto mode share, accessibility to destinations are valuable, especially in the high-density, transit-served portions of the Bay Area. The land use impact metrics also provide value. The Bay Area SCS also establishes performance standards and appropriate measurements to guide implementation and updating of the Bay Area SCS. On the other hand, some rural agencies lack the resources to apply a robust performance system.

Given the different capacities and fiscal resources of individual agencies and regions, the CTP 2040 should commit to funding at every level of performance measurement. The infrastructure of a performance metric system—including the collection and maintenance of data and the processing systems to make the data accessible and understandable—is costly. Page 110 of CTP 2040 includes a policy to “improve data” without a mention of funding. However, the reference in relation to modeling on page 125 calls for “secure stable funding.” The CTP 2040 should include policies for properly resourced performance evaluation consistently throughout in the document.

5. Several Trends are Not Sufficiently Considered in the CTP 2040

CTP 2040 should including more emerging technologies and programs that support the plan's goals for expanding multi-modal transportation. Some of the items to consider incorporating include:

- Express (AKA High Occupancy Toll, or HOT) Lanes. Express lanes, whether new lanes or reconfigured existing mixed-flow or High Occupancy Vehicle lanes, provide an effective strategy for reducing greenhouse gas emissions and improving mobility, yet they do not appear to have been included in modeling the alternatives. Express lanes should be considered a viable strategy.
- Expansion of Shared Mobility Services. The plan addresses car sharing but this should be expanded to support all forms of shared mobility (car sharing, bike sharing, real-time ridesharing, Transportation Network Companies, scooter share, shared neighborhood electric vehicles, and on-demand shuttle and jitney services). Given the recent market expansion of these strategies in the Bay Area and statewide, including car-pooling features that allows trips to be combined, and the very real possibility that such services will become part of the fabric of the transportation system (if they are not already), their exclusion is a glaring omission. The CTP 2040 could include a short-range recommendation such as: “Create supportive policies and secure funding for the promotion of shared mobility.” Additionally, the plan touches on autonomous vehicles but should consider the opportunities for shared autonomous vehicles.
- Active Traffic and Demand Management (ATDM). The CTP 2040 deals with TSM and TDM separately. Instead, it should consider bringing these concepts together under the heading of ATDM. ATDM builds on Integrated Corridor Management to dynamically monitor, control, and influence travel demand, traffic demand, and traffic flow of key highway corridors. ATDM facilitates the use of transportation alternatives through real time traveler information at the corridor level, dynamic ridesharing, dynamic pricing, etc.

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- *Unified Transportation Payment Account.* A unified or universal transportation account combines all forms of public transportation payments including transit fares, municipal parking and toll collection into a single user-friendly system. The Bay Area has been expanding the use of the Clipper Card and finding significant success with that program. By offering rewards based on frequent use, toll discounts and other incentives, the system can lead to a shift from driving alone to using public transit or ridesharing.
 - *Mobility Hubs.* The plan references Transit Oriented Development but could expand on this to incorporate support for the Mobility Hub concept, as exemplified in the Bay Area SCS by Priority Development Areas (PDAs). Mobility hubs provide an integrated suite of transportation services, amenities, and urban design enhancements that bridge the distance between transit and an individual's origin or destination. Mobility hubs are places of connectivity, where different modes of travel come together seamlessly, and where there is a concentration of employment, housing, shopping, and/or recreation. Mobility hubs feature a range of coordinated transportation services including: bike share, car share, neighborhood electric vehicles, bike parking, dynamic parking management strategies, real-time traveler information, real-time ridesharing, demand-based shuttle or jitney services, bicycle and pedestrian improvements, way finding, urban design enhancements, and supporting systems like mobile applications, electric vehicle charging, smart intersections, and a universal payment system to make it easy to access a wide range of travel choices.
As a corollary, CTP 2040 should clearly recognize the SB 375 requirement to consider financial support for areas providing preservation of farmlands and open space. In the Bay Area, this is done through the designation and funding of Priority Conservation Areas.
 - *Parking Management.* The plan mentions parking but could expand on this to encourage parking policies and management strategies that support transit oriented development and alternative transportation choices. MTC has invested substantial resources in examining parking solutions and providing them to its partners at the regional and local level.
 - *Connected Vehicles/Autonomous Vehicles (CV/AV).* The focus by the State on CV/AV should be placed on two key areas. The first is supporting the U.S. Department of Transportation Connected Vehicle Model Deployment Programs to prepare for connected vehicle deployment applications. Over the next several years we anticipate significant activity and new developments by the State and by the US DOT on CV/AV. The second focus should be partnering with the private sector, to learn in advance the new CV/AV capabilities that are being launched by the auto industry. Many of the new CV/AV features will operate independently of the infrastructure, and the Department should consider these features before investing. Thus, we suggest a strategy recommendation under Chapter 8 also be added to demonstrate/continued support for coordinated CV/AV efforts and perhaps leave the long-term recommendation "as is" which focuses on actual deployment "exploration" activities.

B. FUNDING & FUNDING NEEDS FOR RTP IMPLEMENTATION

The Bay Area CMAs support the comments made by CALCOG in their comment letter on CTP 2040, namely:

Pg. 9: Suggest expanding to reflect local funding sources that help accomplish regional planning activities (in addition to only state and federal).

Pg. 26: Figure 1 should also add revenues to the graph to show the historical reduction in available revenues.

Pg. 27: First paragraph – discussion should go into a bit more detail about how over time the state has passed several bond measures to fund transportation, but that these measures are one---time only; that there is a need for sustainable and predictable funding stream that keeps up with inflation, changes to driving behavior, and vehicle efficiencies. It also might help to quantify the deficit as a whole and/or for certain categories. For instance Caltrans' 2015 Mile Marker report shows that there is a \$19 billion 10-year unfunded need for bridge work.

Pg. 48: Should update the proposed decreased level in state excise tax for FY 2016. May also note how the volatility of ups and downs is causing potential for disruption in the transportation planning and implementation process.

Pg. 49: Second paragraph on bonding...not sure if this is supposed to be an example or one highlight. The state also uses TIFIA to fund transportation projects – maybe say state uses other funding mechanisms such as GARVEE or TIFIA.

Pg. 50: Cap & Trade paragraph and table 15 – although true, should be updated as the call for projects for some of these programs are done for a 2-year timeframe.

Pg. 52: The threshold to pass local sales tax measures is two thirds, not 65 percent.

Pg. 52: Under Highways, there should be a more up to date expenditure period than 2001---2011.

Pg. 54: Under “Funding Challenges: Decreasing Revenue” (page 54), there is some discussion on declining revenue due to better fuel efficiency and economic downturns. Additional points to add include: (1) price-based excise tax (former sales tax on gasoline) fluctuates with price, and with no floor, can (and has) cause significant swings in revenue; and (2) a stable revenue source is necessary to keep awarded projects under construction and planned projects on track for delivery.

Pg. 55: The “Strategies to Reduce the Funding Gap” section focuses mainly on existing use and sales taxes. There should be a discussion on other potential sources of revenue, such as goods movement fees, container fees, and tolling and VMT fee collection.

Pg. 108: Investing in public awareness for safety is good strategy, but often there are no funds for those activities – funding has been specific to capital projects and not for outreach or operations. We did not read in the above funding chapter anything about including those as eligible activities.

Pg. 113: The short-term recommendation seems more general when compared against the long term that is more specific. Creating a tax increment district would lead to disparity among jurisdictions, the state may want to advocate for consistent infrastructure conditions not varying differences like we have today in “self help” and non “self help” counties.

Pg. 113: The recommendations under the Permanent Funding section could be enhanced. The report itself identifies a lack of indexation of fuel taxes as a cause of the lack of funds in today’s environment, and yet, an indexation of fuel taxes is not included in the proposal. Likewise, the Road Usage Charge is discussed in the report, but no mention of it in the recommendation. Perhaps it is being included obliquely under the first bullet “Support efforts of a pricing strategy”. If the state feels inhibited to be more specific about funding options, it should include all strategies, including indexation and mileage---based fees as options to be explored with policy makers leading to eventual adoption of one or more of them, not as recommendations to be implemented. Should VLF’s and Speaker Atkins’ idea be included in the report? Putting TIF as a strategy for long---term financing as a fund source is not adequate or reliable for future needs. The recommendations for this section should be strengthened to meaningfully address what the focus groups identified as one of the important challenges: the lack of funds.

Pg. 122, Invest Strategically. “(SHOPP) funding levels are not sufficient to meet all maintenance and rehabilitation needs.” The Bay Area CMAs agree with this statement, and believe it would be good to mention some alternative revenue source ideas in this section

C. TECHNICAL & IMPLEMENTATION RECOMMENDATIONS

The Bay Area CMAs support the comments made by CALCOG regarding technical implementation in their comment letter on CTP 2040, namely:

Chapter 1: Purpose and Context: CTP 2040 Goals. The six goals do not align fully with the five new Caltrans and CalSTA goals (developed in response to the SSTI findings, 2014). Should they be aligned? For example, CTP 2040’s sixth goal is “Practice environmental *stewardship*” whereas the second Caltrans/CalSTA goal is “Stewardship and efficiency” (Responsibly manage California’s transportation assets). The use of similar terms for different goals in these two documents can be confusing.

Pg. 5, Table 5: Consider including some data for miles of transit service operated (perhaps separated by heavy rail, light rail, bus). Is there any bike information available at a statewide level, perhaps miles of Class I facilities?

Pg. 11: Although the statement that “eventually, the (HSR) system will extend to Sacramento and San Diego” is consistent with the CHSRA’s business plan, CTP 2040 should address the Phase 2 HSR corridors. Phase 2 is only briefly mentioned in the CHSRA business 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 recommend that CTP 2040 include Phase 2 of the HSR system in Alternative 1 or at least in a minimum in Alternative 2.

Pg. 101: Under “Greenhouse Gas Emissions section,” the sentence reads, “AB32 requires that the 2020 total GHG inventory be the same as the 1990 GHG inventory, then 80 percent below the 1990 GHG inventory by 2050.” This needs to be clarified. AB 32 does not require the 80 percent below 1990 level by 2050. It is the Executive Order – EO S---3---05 that included the 80 percent below 1990 goal. Governor Brown’s recent EO should also be incorporated.

Pg. 103 Alternative 1 in Figure 12 (Statewide GHG Emission Changes Relative to 2020) appears to show that greenhouse gas emissions will increase by approximately 11 percent between 2040 and 2050. Please provide information so that readers can understand to what we can attribute this increase.

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% 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% per year; these moves by tonnage are highly substantial when compared to exports/imports. Lastly, “tonnage” is more appropriate rather than “weight.”

Pg. 60: Traffic Management System: The title and reference throughout the text in this section seems to infer continued focus on "traffic," which seems to be in conflict with overall theme of this goal where focus should be multi---modal mobility.

Pg. 60: A key point that could be referenced here, to assure consistency with regional plans or assure that this plan maintains its support for moving forward with G1 - is that improving multimodal mobility and accessibility is based on the foundation of multi---modal system performance and optimization for all modes. These can include multi-modal network efficiencies that cut across multi-jurisdictional operational improvements that do not require significant funding for major capital intensive infrastructure needs. TSM strategies are among the most cost effective strategies for achieving immediate mobility benefits but that will require the State to work in partnership with local and regional agencies.

Pg. 67. The Goal 2 discussion of *Preservation of the Multimodal Transportation System* mainly discusses road infrastructure. While the recommended strategies include a process for transit asset maintenance (Strategy P2---S4), public transit investments should be included in additional strategies, such as “include transit as a recipient of a “sustainable funding for maintenance and preservation”. (The example of the SHOPP program in P1---S3 reinforces the roadway focus of the goal).

Pg. 61: “The concept of Integrated Corridor Management (ICM) is also in development to improve traffic flow from highways to surface streets. Together, these technologies should pave the way for widespread deployment of fully automated vehicles.” Would like to suggest that clarification or distinction should be made to express that ICM can be considered as a near to midterm recommendation strategy under Chapter 8 recommendations.

Pg. 120: See generally, comments made under for ICM and Connected Vehicles under Chapter 6 page 61. Additionally, and this may seem more of an observation for internal discussion, overall it is not clear on how the recommendations laid out under this Chapter translate to actual funding commitments as they seem to denote general and guiding activities or efforts and not project/program level efforts. That said, even the specific recommendations need improvement:

Pg. 120--121, Systemize Traffic Management: The CTP 2040 only includes mid--- and long--- range TMS investments. TMS should also be a short term investment. Adaptive traffic signals listed under the “mid to long---range” timeframe are already being installed and should also be a short term strategy. Likewise for connected vehicle and vehicle platooning, in which exploration is already under way.

Pg. 124: The “Reduce VMT” recommendations are worded in a way that unnecessarily limits their scope to certain strategies. Generally they should be broadened to allow more flexibility. Here are three suggestions:

- First, expand the recommendation so that it reads: *“create policies to incentivize employers to develop commuter benefit programs that encourage transportation alternatives. Encourage parking management strategies at the workplace, such as parking cash--out or priority parking for HOVs that discourage drive--alone commuting to work. Provide greater telecommuting options, and alternative work schedules designed to reduce the number of daily commute trips”* and add *“create policies that incentivize developers to provide TDM programs and services that mitigate the traffic impacts of developments.”*
- Second, consider expanding recommendation to *“secure additional funding to implement significant transit improvement strategies, including, but not limited to, increasing speeds, decreasing fares, increasing BRT, and improving transfer times”* to include improved access/connections to transit as well as improving the technologies (real---time traveler information, universal transportation account) that increase the convenience and competitiveness of public transit thereby creating more a positive attitude towards public transit for choice riders.
- Third, consider expanding recommendation to *“implement substantial public outreach to publicize the GHG benefit of eco--driving, car sharing and telecommuting”* to include transit and ridesharing.

D. CONCLUSION

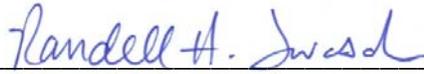
The Bay Area CMAs appreciate this opportunity to provide our input on the Draft CTP 2040, and we will continue to work with our local and regional partners, and with the Department, to build and maintain partnerships that advance the goals we all share.

Thank you for the opportunity to comment on the proposed Draft CA Transportation Plan 2040.

Sincerely,



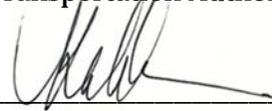
Art Dao, Executive Director
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Randell Iwasaki, Executive Director
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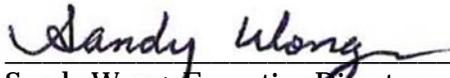
Dianné Steinhauser, Executive Director
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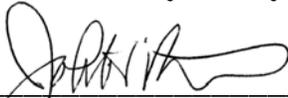
Kate Miller, Executive Director
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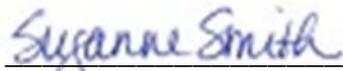
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