

---

**From:** Jack Lucero Fleck <luceroofleck@gmail.com>  
**Sent:** Monday, March 28, 2016 5:09 PM  
**To:** ctp2040@DOT  
**Subject:** comments on final draft of CTP from 350 Bay Area  
**Attachments:** comments on final draft.pdf; comments on first draft CTP.pdf

First Name: Jack Lucero  
Last Name: Fleck  
Title: Steering Committee Member  
Organization: 350 Bay Area  
Address: PO Box 18762  
City: Oakland  
Zip Code: 94619  
Telephone Number: 510-436-7682  
Email address: [luceroofleck@gmail.com](mailto:luceroofleck@gmail.com)

Date: March 27, 2016

To: Gabriel Corley, CTP Project Manager

Division of Planning, MS-32

California Department of Transportation

P.O. Box 942874

Sacramento, CA 94274-0001

From: Jack Lucero Fleck, 350 Bay Area

**Re: Comments for the California Transportation Plan (CTP) Final Draft**

We at 350 Bay Area are pleased to see the final draft of the CTP, and we urge its rapid adoption. We see the goals of the plan as being essential to formulating specific policies to achieve the deep reductions in greenhouse gases necessary to combat climate change. 350 Bay Area submitted comments to the first draft of the plan on March 26, 2015, which we feel are still valid (please see attached).

We recognize that this is a final draft, and major changes are not likely. However, we also understand that transportation planning is an ongoing process, so we look forward to working with you in your continuing planning efforts. In particular we encourage efforts to expand such programs as active transportation, increased carpooling through parking pricing, and promoting economic analysis, education and awareness of the need to eliminate fossil fuel vehicles.

We also have three specific suggestions:

1. Page 111, 2nd paragraph, should say 40 percent reduction by 2030 (word "percent" is missing)
2. There is no mention of the Appendices in the table of contents (Page 2) of the draft plan. These are on the website, but not referenced in the plan itself. They should be listed with a brief description of their contents and a link to their web sites.
3. Table 13 (Page 70) does not specify that the percent reductions shown in the table are from the year 2040 projected VMT in Scenario 1, not the current VMT. This should be clarified.

Thank you for your work on the CTP, and we look forward to working with you, MTC, and many others to make the plan succeed.

Sincerely,

Jack Lucero Fleck

350 Bay Area, PO Box 18762, Oakland, CA 94619; 510-436-7682; [luceroфлек@gmail.com](mailto:luceroфлек@gmail.com)

Attachments: pdf of this letter  
pdf of comments on first draft 3-26-15



Date: March 27, 2016

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

From: Jack Lucero Fleck, 350 Bay Area

**Re: Comments for the California Transportation Plan (CTP) Final Draft**

We at 350 Bay Area are pleased to see the final draft of the CTP, and we urge its rapid adoption. We see the goals of the plan as being essential to formulating specific policies to achieve the deep reductions in greenhouse gases necessary to combat climate change. 350 Bay Area submitted comments to the first draft of the plan on March 26, 2015, which we feel are still valid (please see attached).

We recognize that this is a final draft, and major changes are not likely. However, we also understand that transportation planning is an ongoing process, so we look forward to working with you in your continuing planning efforts. In particular we encourage efforts to expand such programs as active transportation, increased carpooling through parking pricing, and promoting economic analysis, education and awareness of the need to eliminate fossil fuel vehicles.

We also have three specific suggestions:

1. Page 111, 2nd paragraph, should say 40 percent reduction by 2030 (word "percent" is missing)
2. There is no mention of the Appendices in the table of contents (Page 2) of the draft plan. These are on the website, but not referenced in the plan itself. They should be listed with a brief description of their contents and a link to their web sites.
3. Table 13 (Page 70) does not specify that the percent reductions shown in the table are from the projected VMT in Scenario 1, not the current VMT. This should be clarified.

Thank you for your work on the CTP, and we look forward to working with you, MTC, and many others to make the plan succeed.

Sincerely,  
Jack Lucero Fleck  
350 Bay Area, PO Box 18762, Oakland, CA 94619; 510-436-7682; lucerofleck@gmail.com



Date: March 26, 2015

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

From: 350 Bay Area

**Re: Comments for the California Transportation Plan (CTP) workshop—  
March 26, 2015, Oakland**

350 Bay Area is an activist organization, working for deep reductions in carbon pollution in the San Francisco Bay Area & beyond. We are working extensively with the Bay Area Air Quality Management District to achieve an 80% reduction in fixed sources of greenhouse gases (GHGs), and we hope to work with Caltrans, the Air Resource Board (CARB), and the Metropolitan Transportation Commission (MTC) to do the same with transportation.

Caltrans is to be commended for excellent work in producing the CTP, a groundbreaking document. In particular, the plan successfully shows how to achieve the state's goal of an 80% reduction in GHGs from transportation. The CTP is a clear example of how California is leading the way in the fight to stop climate change.

The plan has a logical three step approach to reduce GHGs:

Alternative 1. Existing plans—The CTP starts with Sustainable Communities Strategies (SCS) as mandated by SB375. These are good plans, and they do stop the increase in GHGs, but they do not achieve the significant reductions in GHGs that are needed.

Alternative 2. This adds more aggressive pricing, transit, car sharing, biking, walking, and other strategies. Altogether these aggressive strategies result in a projected 21% reduction in GHGs.

Alternative 3. This practically eliminates emissive (fossil fuel driven) vehicles and assumes a mix of zero emission vehicles to get the 80% reduction goal.

Below are our specific comments on the draft plan:

1. **We strongly support the plan's 80% GHG reduction goal**, and we will urge MTC to adopt this goal and the plan's overall three step approach as well.

2. We applaud the CTP for setting one of its major goals to "**Integrate Health and Social Equity into Transportation Planning and Decision Making**", and we encourage the funding and

implementation of the plan to strongly reflect this goal. We know that low income communities are underserved by the current transportation system and suffer the most from air pollution from fossil fuels, living near refineries, freeways, and railroads. Rectifying these injustices by improving transportation access for low income communities, and by eliminating fossil fuels is essential for making the plan serve all Californians.

3. The plan needs to be more than "aspirational" document. There needs to be a feasibility analysis of what measures are realistic—both technically and politically. With that in mind, here are some suggestions:

#### **Feasible actions:**

--Ride sharing/car sharing. We believe that California can harness smart phone technology to connect riders with vehicles and with other drivers, especially if there are incentives for participation. The CTP only projects a 2.9% reduction in vehicle miles traveled (VMT) from carpooling and 1.1% for car sharing. This suggests an increase in vehicle occupancy from 1.3 persons/vehicle to 1.35 persons/vehicle. We feel California can do much better than that, combining incentives and education (see #8 below).

--Electric vehicles—CARB calls for all Zero Emission Vehicles by 2040 (slide #7, Dec. 9, 2014 TAC), but why wait that long—why not aim for 2030 or even 2020? California should be leading the way. And why does page 125 list incentives for ZEVs and alternative fuels as "LONG-RANGE"? Some of these incentives are already in place and should be continued (e.g. federal and state tax credits, HOV lane access, no gas tax). The CTP predicts that "ZEVs will represent 12% of total sales by 2030". However, ZEVs and Plug-in Hybrid Electric Vehicles (PHEVs) were already 3% of sales in 2014. With continued incentives and public education, this 12% total should be reached much earlier than 2030.

--Land use controls to limit Vehicle Miles Traveled (VMT)—Prohibiting urban sprawl is important to keep VMT from growing. Local planning agencies should be given incentives to comply with these land use controls. We notice that there is no attempt to estimate a percentage reduction in VMT by promoting transit oriented development; why not?

#### **Somewhat feasible**

--Transit improvements—The goal of doubling transit by 2040 is ambitious, and we support it. However, given that it will probably take at least 40 years just to build another BART tube, the plan should clarify the cost of this proposal to double transit and discuss realistic timelines and funding sources

#### **Not likely**

--The pricing proposal for a road user charge equivalent to \$4.00 per gallon is not likely to gain political support. This speaks to the need for public education about the true cost of fossil fuels on public health, agriculture, and the economy as a whole. With extensive public education, it is possible that a program such as "fee and dividend" charges on gasoline could gain support.

--Increase Fuel Cell vehicles—We note that CARB reports to the CTP Technical Advisory Committee include an estimate that 50% of all vehicles will be Fuel Cell by 2050. However, the cost of fuel cell vehicles is way above the cost of electric vehicles, so we are not clear why the

predictions for already-on-the-market electric vehicles (about 20% of all vehicles in 2050) are so limited.

4. Clarification needed--Figure 7 on page 161 of the CTP predicts that about 2/3 of future fuels will be biofuel blends; this seems to conflict with CARB estimates that future fuels will be about 50% electricity and hydrogen. This should be clarified. We do not think biofuels will be needed for the light duty vehicle market, but may be important for rail/truck/and nautical shipping.

5. Where is the **economic analysis**? This should include the air quality benefits from eliminating fossil fuels, as well as the health benefits from active transportation, and the costs from inactive transportation—heart disease, obesity, diabetes, etc." Economic analysis should also include the job benefits of producing clean energy vs. fossil fuel energy. TREDIS (Transportation Economic Development Impact System), the CTP tool for measuring economic impacts does not appear to include these issues. It also does not include looking at the cost of inaction—i.e. sea level rise, lack of snowpack, drought, floods, forest fires, etc.

6. **Active Transportation**—The plan calls for doubling bicycle and pedestrian modal splits by 2040. We feel this is well below what is possible to achieve deeper VMT reductions and maximize the potential of active transportation. When taking into account the health benefits due to increasing physical activity, the co- benefits of active transportation (which includes transit because of the walking that goes along with transit use) are significant—e.g. see the Calif Dept of Public Health's (CDPH) work on the Integrated Transit and Health Modeling Tool ([ITHIM](#)). The CTP should consider what it would take (policies and funding allocations) to get active transport levels to an average of 15 minutes/person/day (bike/walk). This is a target that MTC is currently using and that several other Metropolitan Planning Organizations (MPOs) are considering in the newest round of their SCS updates. CDPH has worked with MTC and other MPOs on quantifying health co- benefits at this level of active transport and have demonstrated that reductions in chronic disease are significant.

Combining land use changes (discussed in #3 above), robust education and public engagement (see #8 below), and development of appropriate facilities, we think that these modes can do much more than double by 2040, especially in dense urban areas which purposely align land use, transportation and health policies with overall climate goals. This result can also be enhanced by the expansion of measures like Safe Routes to Schools. The plan should also support electric bikes that help with hilly or longer trips, and still provide active transportation.

7. Self driving vehicles—These should be ubiquitous by 2040. This will have major implications for car sharing, ride sharing, and transit. The CTP should include measures to ensure that self driving vehicles enhance the mobility and safety of Californians without increasing GHGs.

8. **Education**—Community members need to understand global warming and understand how they can be an active part of the solution, particularly in the choices they make about transportation. Education campaigns in the spirit of Smokey the Bear's "Only you can prevent forest fires" or Rosie the Riveter's "We can do it" need to be launched. [Labels on gas pumps](#)

should inform motorists that burning gasoline causes global warming and that their city's Climate Action Plan suggests ways to reduce their gas use. 350 Bay Area has developed and promoted a community education strategy called Beyond the Pump which we would be happy to share with CTP 2040 planners. This kind of a campaign, like campaigns to require seat-belts, stop drunk driving, or promote anti-tobacco, when combined with policy and environmental changes, have been shown to contribute to social norms change. The new social norm should be that driving an internal combustion engine vehicle is like second hand smoke—it is harmful to you and your family by contributing to climate change and air pollution. The campaign should also stress that there are viable and accessible alternatives.

Thank you for this opportunity to comment on the CTP, and we look forward to working with you, MTC, and many others to make the plan succeed.

--submitted by Jack Lucero Fleck, Kathy Dervin, and Janet Stromberg--[350 Bay Area](#), "Beyond the Pump" team and "Bay Climate Action Plan (BayCAP)" team

You may contact us at 350 Bay Area, PO Box 18762, Oakland CA or by phone: 510-436-7682 or by email at [luceroFleck@gmail.com](mailto:luceroFleck@gmail.com)