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March 28, 2016

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

Re: **Public Review of the Draft California Transportation Plan 2040**

Dear Mr. Corley:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to comment on the Draft California Transportation Plan 2040 (CTP 2040) prepared by the California Department of Transportation (Caltrans). OCTA recognizes the difficult challenge set forth by Senate Bill 391 (Chapter 585, Statutes of 2009) to demonstrate how the transportation sector can achieve greenhouse gas (GHG) emission reductions of 80 percent below 1990 levels, and OCTA once again commends Caltrans for taking on this challenge. However, OCTA feels that since the strategies in the Draft CTP 2040 are undefined and lack funding, it should clearly define its role as a vision document, and provide direction for how the recommendations should be implemented by Caltrans staff. Finally, OCTA believes the development process could have benefited from broader stakeholder engagement. These recommendations are discussed in further detail below.

First, OCTA supports the goals of the CTP, and has been working to implement projects and policies that are consistent with many of the recommendations from the Draft CTP 2040. For example, OCTA is working within a constrained funding environment to support implementation of a regional network of bikeways, reallocate transit resources to more efficiently serve high-demand areas, study opportunities for transit-oriented development, and improved active transportation connectivity to transit services. Furthermore, OCTA has a voter-approved sales tax measure to fund a multimodal set of programs and projects that improve mobility in the region, reduce emissions, and preserve and enhance the environment. These include signal synchronization, system preservation, new streetcar services, enhanced commuter rail services, freeway congestion management, an advance-mitigation program that has set aside over 1300 acres as permanent open space in Orange County, and a competitive funding program to mitigate water runoff beyond required standards. In addition to the aforementioned programs and projects, OCTA currently operates a clean fuel fleet, and is exploring integration of zero-emission transit technologies.

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However, in order to achieve the GHG reduction targets established through Senate Bill 375 (Chapter 728, Statutes of 2008), the Southern California Association of Governments builds on county long-range plans to assume additional strategies in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that rely on new funding. These strategies are also consistent with the goals of the CTP, and include further expansion of transit services, implementation of additional bikeways, establishing a regional network of high-occupancy toll lanes, replacing existing fuel taxes with a mileage-based user fee, and intensified land use patterns. Through these strategies – identified at the local, county, and regional levels, in order to reduce vehicle miles traveled, GHG emissions, and single occupancy vehicle trips – the reasonably available revenues, including assumed new sources, have been stretched thin.

As noted earlier, OCTA understands that the CTP is required to demonstrate how the transportation sector can comply with the goals of Assembly Bill 32 (Chapter 488, Statutes of 2006), and that it must identify strategies that expand upon the local and regional plans to do so. However, there is no identified funding for these proposed strategies that go beyond local and regional plans. Therefore, the CTP is, by nature, a vision document that serves the role of providing a common focus for state agencies, as well as local and regional plans.

*OCTA recommends that the role of the CTP be clearly defined as a financially unconstrained vision, describing the general direction the state would like to proceed with transportation planning. The CTP should recommend that transportation planning agencies take the CTP goals and recommendations into consideration in future planning efforts. Concurrently, the CTP should also recognize the importance of the bottom-up planning approach, which provides local transportation solutions to communities and businesses that cannot be as effectively addressed through statewide policies. This is a proven and effective approach as there have been numerous counties which have passed transportation sales tax measures.*

Furthermore, the recommendations discussed in the Draft CTP 2040 are justified in part, through the results of the financially unconstrained emission reduction exercise. While OCTA generally agrees that the stated recommendations would benefit the transportation system, we are concerned by the fact that the expectations go unstated for how the recommendations should be implemented by Caltrans.

There is little acknowledgement that the recommendations are derived from a modeling exercise that utilizes unfunded strategies, and there is no clear direction for how the recommendations are intended to be implemented. The expectation of the state cannot be to implement these recommendations to the extent necessary

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to achieve Assembly Bill 32 (Chapter 488, Statutes of 2006), GHG emission reductions without explicit funding commitments. Until that time, expectations must be tempered to what can realistically be achieved, based on reasonably available funding and RTPs.

It should also be noted that state and federal law vests metropolitan planning organizations with developing financially constrained RTPs. The RTPs throughout the state demonstrate what can be achieved with reasonably available funding sources. Furthermore, they are also generally consistent with the goals, policies, and recommendations seen in the Draft CTP 2040. Finally, the RTPs also incorporate the projects and programs that address local transportation needs, and reflect the many voter-approved sales tax measures throughout the state.

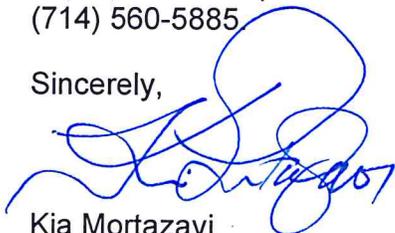
*OCTA recommends that the CTP recognize that the strategies lack the specifics necessary to develop cost estimates, and that the associated recommendations can only be implemented to the extent that funding is available. Moreover, the CTP should recognize that the RTP/SCSs are consistent with the goals, policies, and recommendations of the CTP. Therefore, the CTP should state that Caltrans is expected to implement the CTP recommendations in a manner that supports delivery of the RTP/SCSs.*

Finally, the development of the Draft CTP 2040 appears to have had limited involvement from stakeholders on the Policy Advisory Committee and Technical Advisory Committee. Representation from Southern California appeared particularly limited, and it was surprising that no representatives from the ports of Los Angeles, Long Beach, or Oakland were included, as goods movement is a major component of transportation in the state.

*OCTA recommends that future updates of the CTP include a broader set of stakeholders in the advisory committees that better correlate to the location of population and commerce within the state.*

Thank you for the opportunity to review and provide comments. If you should have any questions, please contact Greg Nord, Senior Transportation Analyst, at (714) 560-5885

Sincerely,



Kia Mortazavi  
Executive Director, Planning

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