

March 29, 2016

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

**Re: SANBAG Comments on the Final Review Draft of the California
Transportation Plan 2040**

San Bernardino Associated Governments (SANBAG) appreciates this opportunity to offer comments on the final review draft of the California Transportation Plan (CTP) 2040. SANBAG is the Council of Governments and County Transportation Commission for the County of San Bernardino, the largest county geographically in the continental United States (over 20,000 square miles) and home to 2.1 million residents.

We recognize that Caltrans has worked long and hard on a substantial redraft of the CTP. We believe this is a significant improvement and that the document itself is well structured and well written. We especially appreciate the effort that went into analyzing strategies for reduction in vehicle miles of travel (VMT) and greenhouse gases (GHGs). Analyzing the impacts of transportation strategies at a statewide level is extremely challenging, and Caltrans, together with the California Air Resources Board (CARB) were able to bring together the analytical tools for conducting this statewide analysis.

In explaining the purpose of the CTP, the Preface states that “*Regions have adopted growth plans, and will soon begin revising them, to deliver the more sustainable transportation system now required by California law. How does the state help achieve the same objective? That question is what this plan attempts to answer.*” The Preface goes on to describe the particular focus on sustainability, reduction of GHG emissions, reduction of VMT, and integration with other statewide and regional plans.

SANBAG’s concern, however, is that achieving some of the objectives, particularly the VMT reduction objective, is not as easy as the analysis in the CTP 2040 makes it sound. As an agency that focuses on funding and implementing multi-modal transportation improvements, we believe it is important for SANBAG to bring this additional perspective to Caltrans’ attention. This is particularly important since Caltrans indicates that “*the resulting CTP will serve as a guiding document of information for the development of future modal plans, programs, and major investment decisions on the transportation system.*” The CTP will have substantial influence on state policy.

As explained in our April 17, 2015 comment letter on the first draft of the CTP 2040, SANBAG has been actively engaged in charting a path toward a more sustainable future, as identified in our own Countywide Transportation Plan and our sustainability Memorandum of Understanding (MOU) with the Southern California Association of Governments (SCAG). Our countywide plan and the MOU describing some of our sustainability initiatives may both be accessed at the following SANBAG web page: http://www.sanbag.ca.gov/planning2/plan_county-wide-transit.html. We continue to be very active in a wide range of sustainability initiatives including energy efficiency, GHG reduction, habitat conservation, demand management, active transportation, and integrated transit/land use planning. We understand the direction the state is going with the CTP, but believe it is important to comment on some of the VMT-based assumptions and analysis.

Analysis of VMT Reduction in the CTP 2040

Caltrans has highlighted the fact that the analysis in the CTP represents a series of sensitivity tests on a set of transportation strategies that “*were created for the purposes of the modeling exercise and do not represent specific policy recommendations.*” We understand and appreciate that point. Nevertheless, some of the assumptions used for several of the strategies (most notably the pricing and transit strategies) are so extreme, that they are likely to be misleading if and when relied upon for “future modal plans, programs, and major investment decisions.”

We expressed this same concern in our comments on the first draft of the 2040 CTP. For example, we commented that the “doubling of transit service, doubling of transit speeds, free transfers, and reduced wait times is also a highly unrealistic scenario.” The final review draft CTP cut back on the transit speed assumption (now 50% higher than existing, not 100% higher), but kept the other assumptions intact. We strongly question whether achieving these levels of transit service is realistic, even if the necessary levels of funding, which would be unprecedented in scope, were to be provided.

We are assuming that Caltrans would envision that some or all of the funding for this dramatically increased level of transit service would come from the funds flowing from the pricing strategy explained on pages 11 and 12 of Appendix 7. As stated,

“The ‘Implement Expanded Pricing Policies’ strategy increased, in the model, 2040 statewide auto operating costs by 16 cents per mile. The urban congestion charge also increased auto operating costs by an additional 16 cents per mile. This totals the urban county increase in auto operating costs by 32 cents per mile.”

In our comment letter on the first draft, we had suggested that 16 cents per mile “is an extraordinarily high cost assumption, and would be equivalent to an extra \$4.00 in the cost per gallon of gasoline, assuming an average fuel economy of 25 miles per gallon for the auto fleet.” We suggested that Caltrans use a lower cost assumption, such as 2 cents per mile, which “would be equivalent to a still very aggressive 50 cent charge per gallon of gasoline, yielding a 2.8% reduction in VMT.”

Instead, the final draft of the 2040 CTP doubles down on the 16 cents per mile assumption, adding another 16 cents per mile congestion charge in urban counties. This is an extraordinary assumption. The 32 cents per mile is equivalent to an \$8.00 per gallon surcharge (in 2010 dollars) assuming an average fuel economy of 25 miles per gallon. Given that the CTP predicts that fuel economy will increase to 36 miles per gallon by 2040, this would be equivalent to a fuel surcharge of almost \$12 per gallon for urban drivers.

In addition, it is unclear why the level of VMT reduction from pricing in the draft final CTP is essentially the same (17%) as the reduction in the first draft, while the per-mile surcharge has virtually doubled. Without additional information, we can only assume that Caltrans concluded that the relationships between cost and travel used in the first draft were incorrect. In any event, we appreciate the re-analysis but are now even more concerned with the pricing assumption itself.

It should also be noted that these pricing charges represent an extraordinary amount of revenue. Just using conservative assumptions, and based on VMT estimates in the draft final CTP, the annual revenue from the pricing surcharge alone (not counting baseline revenue) would be approximately \$50 billion in 2010 dollars. Even though, as Caltrans indicates, these scenarios are for analytical purposes only and are not directly tied to the recommendations, we are concerned that readers will get the impression that the level of VMT reduction forecast in the CTP analysis is actually achievable. It would be wonderful if VMT reductions were as simple as the CTP makes them sound, but they are not.

It is important to have confidence in the CTP going forward, and as currently stated, the CTP wildly overstates the potential for VMT reduction compared to the reductions that would be analyzed with assumptions that most transportation analysts and policy makers would consider reasonable. It also dramatically overstates revenue potential. Even though the transportation revenue needs are large, even just to maintain our existing system, the levels implied by the analysis in the CTP are not realistic.

It is important to remember that a clearly stated principle of AB 32 (the Global Warming Solutions Act) is to “*achieve the maximum technologically feasible and cost-effective greenhouse gas emission reductions...*” (Part 4, Section 38560). Accordingly, the state’s expectations for VMT reduction need to be calibrated to what is feasible and cost-effective, especially in a document that will be as influential as the CTP 2040 is likely to be.

Why Be Concerned with the VMT Analysis?

Why have we gone to this level of detail in focusing on the VMT analysis? First, the Preface of the CTP states that “*climate change is a key issue for California and the CTP 2040 is a benchmark document to address this challenge.*” VMT reduction is postulated as a critical element of the state’s efforts to reduce GHGs. Our contention is that the CTP substantially overstates the likely contribution of VMT reduction toward achieving the GHG reduction goal. This has implications for future investment and for emphasis in

state programs. We are concerned that unrealistic expectations of what can be achieved through VMT reduction will unnecessarily divert the state from making important investments in highway infrastructure, including projects in the SCAG RTP/SCS. The RTP/SCS is truly multi-modal, but it also notes that continued investment in the widening of highways is key to maintaining mobility at a level that will allow our economy to thrive.

SANBAG is supportive of all the core goals included in Chapter 4 of the CTP:

1. *Improve multimodal mobility and accessibility for all people*
2. *Preserve the multimodal transportation system*
3. *Support a vibrant economy*
4. *Improve public safety and security*
5. *Foster livable and healthy communities and promote social equity*
6. *Practice environmental stewardship*

Although the subsequent recommendations that support the goals are mostly process-oriented and somewhat generalized, we noted that one of the recommendations (on page 113) was to “*Implement SB 743 requirements in project development and project reviews across the transportation system.*” We have noted in our comments to the Governor’s Office of Planning and Research (OPR) that implementing VMT-related thresholds for highway projects through the California Environmental Quality Act (CEQA) process, based on the current OPR draft SB 743 guidelines, is likely to delay or otherwise set back the delivery of important highway improvement projects.

Highway mobility is still important, especially for our logistics-focused economy in San Bernardino County. Although we are highly supportive of the original intent of SB 743 in Transit Priority Areas (TPAs), we see that the application of proposed VMT-based thresholds for all highway projects as counter-productive and will have an adverse effect on the achievement of the CTP goals 1 and 3. The implication of the current OPR guidelines is that many more of our county’s highway projects (both state and local roadways) will require CEQA Environmental Impact Reports (EIRs), with statements of overriding considerations required for CEQA clearance. This does not seem to bother OPR, but it is a potentially serious barrier to the timely delivery of highway improvements by those agencies, like SANBAG, engaged in project delivery on a daily basis. Caltrans should be concerned. This recommendation should be eliminated or re-focused to apply to TPAs only. The direction of the OPR guidelines on SB 743 is an example of how unrealistic expectations on VMT reduction potential can percolate through to other transportation policies and have unintended adverse impacts on the state’s mobility and economic competitiveness goals.

Connection of this Issue to the Economy

We agree with the statement at the bottom of page 24 of the CTP under the “Prosperity” section that:

“California’s positive economic outlook is sustained by creating an attractive business climate, continuing to build confidence in the economy, and investment

in a clean energy and transportation system. Transportation helps stimulate the economy by providing Californians with access to jobs, education, health care, goods and services, and social experiences and recreational activities.”

To take that a step further, California needs a strong economy to be able to afford the technological advancements and fleet turnover rates that will enable the state to achieve its GHG reduction goals. The problem is that substantially increasing transportation costs will further set back our business climate, not advance it. Good transportation policy is a delicate balancing act – keeping on the leading edge of clean transportation, while not disadvantaging California and our businesses to the point where the exodus or down-sizing of businesses is perpetuated or accelerates. This will set back California on multiple financial fronts, not just employment. Governor Brown’s Executive Order B-32-15 on sustainable freight, highlights the importance maintaining our state’s competitiveness while we also address GHGs, so we need to keep this balancing act in mind in specific policy initiatives, such as how SB 743 is implemented.

The state must remember that our long term success in promoting clean transportation will depend on the choices of individuals, particularly in their buying more fuel efficient and alternative fuel vehicles on a large scale. The RTP/SCS in the SCAG region shows that the vast majority of future travel in the region will still be by personal vehicle, even with all the major investments being made in transit, first mile/last mile strategies, active transportation, and other alternative modes. We need to make these choices attractive and economically feasible for Californians if we are to reach our GHG reduction target. SANBAG is concerned that an over-reach on VMT-reduction strategies will divert us from success, not lead us on a path to achieve it.

A surcharge at the level assumed in the CTP would have very substantial economic consequences to California, diminishing our economic competitiveness even more than it already is. Although it is recognized that pricing and transit strategies that are more realistic than those analyzed in the CTP will have a more limited impact on GHG reduction, this is the reality that we must deal with. Unrealistic assumptions will only cloud our path forward.

Focus Primarily on Vehicle and Fuels Technology for GHG Reduction from Mobile Sources

The CARB analysis of GHG strategies provided toward the end of CTP Appendix 7 clearly shows that technology-based initiatives will be where most of the GHG reduction must occur. Table 3 in the CARB memo on page 23 of Appendix 7 shows that the VMT-based strategies in the Alternative 2 scenario represent only 15% of the total 80% GHG reduction target by 2050. Given that the CTP’s pricing and transit strategy assumptions (both unrealistic in our view) represent over 2/3 of the source of per-capita VMT reduction, a realistic share of GHG reduction attributable to VMT reduction should be more in the range of 5 percent.

SANBAG suggests that the state maintain its emphasis on vehicle and fuels technology and acceleration of vehicle turnover rates as the primary strategy for GHG reduction for

mobile sources. While we should certainly continue implementing transportation demand management (TDM) and transportation system management (TSM) strategies, we must have realistic expectations on the level of GHG reduction that can be achieved through these VMT-related and operational strategies.

SANBAG is concerned that too much emphasis on or expectation of VMT reduction will divert Caltrans and other state agencies from where the emphasis on mobile source GHG reduction needs to be, i.e. on vehicle and fuels technology. While the CTP does not include specific recommendations on pricing strategies, the analysis of VMT reduction will give citizens and policy makers the false impression that VMT can be reduced by a much greater amount than is realistic. In addition, a pricing strategy at this scale would impose the most severe impacts on disadvantaged communities, such as those we have in San Bernardino County.

At a minimum, a stronger disclaimer should be included in the CTP that highlights the magnitude of the assumptions that are driving the majority of the VMT reduction. Ideally, the analysis in the CTP should be revised to show a level of VMT reduction that is more realistically achievable.

Again, we appreciate the opportunity to comment on this important document. We look forward to continued collaboration with Caltrans and other state and regional agencies to achieve the goals set out in the CTP. We have attached a copy of our comment letter on the first draft of the 2040 CTP as background reference material. Should you have any questions, please contact Steve Smith, Director of Planning, at ssmith@sanbag.ca.gov.

Sincerely,



Ray W. Wolfe
Executive Director



San Bernardino Associated Governments

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- San Bernardino County Transportation Commission ■ San Bernardino County Transportation Authority
 - San Bernardino County Congestion Management Agency ■ Service Authority for Freeway Emergencies
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April 17, 2015

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

Subject: Draft California Transportation Plan 2040

Dear Mr. Corley:

San Bernardino Associated Governments (SANBAG) appreciates this opportunity to offer comments on the draft California Transportation Plan (CTP) 2040. SANBAG is the Council of Governments and County Transportation Commission for the County of San Bernardino, the largest county geographically in the continental United States (over 20,000 square miles) and home to 2.1 million residents.

SANBAG actively collaborates with the Southern California Association of Governments (SCAG) and the other counties in the SCAG region on planning activities of regional significance, including development of the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). We are keenly interested in the CTP 2040, given its aim “to help ensure that policy decisions and investments made at all levels of government and within the private sector will work congruently to enhance the State’s economy, improve social equity, support local communities, and protect the environment” (CTP 2040, page 2). SANBAG has similar goals at the county level. Before presenting our comments, we thought it would be helpful to provide an overview of some of SANBAG’s initiatives and perspectives so that you have a better context for our comments.

SANBAG Initiatives in Mobility and Sustainability

SANBAG is actively engaged in the planning, funding, and implementation of multi-modal transportation improvements as well as sustainability initiatives across San Bernardino County. We signed a Sustainability Memorandum of Understanding (MOU) with SCAG in early 2013, delineating 16 sustainability initiatives to which our agency is committed. In addition, we are:

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- Part of the joint powers authority that constructed and now operates the Southern California Metrolink system.
- Currently building an extension of Metrolink to downtown San Bernardino and will be starting construction on a new passenger rail line from San Bernardino to Redlands in 2017.
- Collaborating with cities in the Metrolink and Redlands Rail corridors on Transit Oriented Development (TOD) initiatives.
- Collaborating with all our local jurisdictions on ridesharing, vanpooling, and active transportation projects, including the State's Active Transportation Program (ATP).
- Funding improvements to and operation of bus transit systems throughout the county of San Bernardino.
- Implementing, with the County of San Bernardino, the Countywide Vision adopted in 2011, in support of the national and statewide emphasis on sustainability. The Vision is a proactive approach to achieving sustainability goals and includes a health and wellness component and an environmental component as two of ten Vision initiatives. See <http://cms.sbcounty.gov/cao-vision/Home.aspx>.
- Partnering with local jurisdictions, the private sector, the health community, and health advocates on an aggressive program to improve all dimensions of public health in San Bernardino County.
- Working with 21 local jurisdictions to implement the Greenhouse Gas Reduction Plan adopted by SANBAG in early 2014.

We point to these and other activities to show that we understand and support the State's direction to have a balanced, multi-modal transportation system, healthy economy, and a sustainable future, including significant GHG reduction. It is noteworthy that southwestern San Bernardino County has some of the worst air quality in the U.S. Like other counties in the SCAG region, we are very concerned about air quality and are a regional partner committed to facilitating further improvements.

At the same time, over 20 percent of our labor force derives its living from the logistics sector, which is often cited as a primary source of air pollutants and greenhouse gas emissions. As we move forward with sustainability initiatives, we must pay attention to the dual objectives of GHG reduction while also promoting a vibrant economy. A vibrant economy is needed to support the technology advancements and adoption into the marketplace in a way that will make the GHG reductions possible. San Bernardino County has been slow to emerge from the Great Recession, and our citizens, many of whom are dependent on logistics for employment, cannot afford to be set back further.

Specific Comments

1. SANBAG appreciates the effort, thought, and analysis that have gone into the preparation of the draft California Transportation Plan 2040. In particular, *Chapter 7: Analysis and Outcomes* is very illuminating as to where local, regional, and state, agencies will need to

focus in an effort to reach the greenhouse gas reduction goals established in AB 32, SB 375, and the Executive Orders on GHG reduction. We recognize that analysis at a statewide level will necessarily be more generalized and cannot be applied directly to individual regions; nevertheless, the results are extremely useful for strategic planning purposes. It is a good way to begin gauging the feasibility and effectiveness of various GHG reduction strategies.

2. A clearly stated principle of AB 32 is to “*achieve the maximum technologically feasible and cost-effective greenhouse gas emission reductions...*” (Part 4, Section 38560). Until this analysis in the draft CTP 2040, it has been difficult to gauge technological feasibility and cost-effectiveness. Table 17 on page 91 of the CTP provides some critical pieces of information to help guide agencies in balancing the GHG reduction goals together with the need for feasibility and cost-effectiveness. If the State can translate these analytical results into feasible and cost-effective paths forward it would be beneficial to agencies striving to reduce emissions.
3. We recognize that the VMT/GHG reduction strategies were evaluated as scenarios for analysis purposes only, without implying any commitment to specific actions or policies. It would be helpful if the State could evaluate the feasibility and implications of each strategy. Some of our specific observations on the analysis results in Table 17 include:
 - a. Road pricing strategy – The transportation industry has long known that the amount of travel is connected to the cost of travel. The assumption of a 75% increase in auto operating cost (16 cents per mile) is a very high cost assumption, and would be equivalent to an extra \$4.00 in the cost per gallon of gasoline, assuming an average fuel economy of 25 miles per gallon for the auto fleet. Caltrans is aware of the challenges of just modest increases in the gas tax, and this would be an order-of-magnitude increase beyond that. We believe that it would be more realistic to use one of the lower cents-per-mile scenarios in Table 4 of Appendix B of the report. Even the 2-cents per mile would be equivalent to a still very aggressive 50 cent charge per gallon of gasoline, yielding a 2.8% reduction in VMT.
 - b. Transit service improvements – A doubling of transit service, doubling of transit speeds, free transfers, and reduced wait times would also seem to be overly optimistic. We understand that this use of aggressive service improvements is a sensitivity test, but some of the assumptions used would not be consistent with the feasibility intent of AB 32, particularly the assumption of transit speeds being doubled. The reduction of 6% in VMT is not likely achievable.
 - c. The reductions in VMT for the doubling of bicycle and pedestrian shares (0.41% and 0.43%, respectively) seems reasonable, given that these trips tend to be short.
 - d. Increasing the carpool occupancy requirements from minimum 2+ to 3+ would significantly increase freeway congestion and will likely not be feasible from a public acceptance standpoint for many segments. Each segment would need to be evaluated on a case-by-case basis.
 - e. As stated on Page 90 of Chapter 7, “*road capacity enhancing strategies were rejected due to concerns these would ultimately increase VMT.*” It would have been useful if

highway improvements had also been analyzed, given that such improvements in growing areas will still be needed to keep traffic on our network moving. We need a robust highway network to remain nationally and internationally competitive from a logistics standpoint. It should be noted that VMT has increased in California at the same time that air quality has been dramatically improved over the last several decades. The same thing could be true with our GHG reduction strategy if we do it right. We can achieve both GHG reduction and mobility/economic development goals, even if VMT should increase in some of the faster growing areas of the state. A significant portion of the San Bernardino County employment is related to logistics, and maintaining mobility is critical to job retention and creation in that sector. Individual transportation projects may increase VMT, but they may be very necessary from a mobility standpoint. It is the net result at the regional and statewide level that is most important, not the effect of an individual project that may be critically needed to address mobility issues.

- f. Land use – we recognize that the CTP 2040 did not analyze land use because, as stated in the CTP, land use is under the purview of local and regional agencies. However, it would be valuable to provide some examples in the report of quantification of GHG reduction from land use strategies, given the policy statements that refer to GHG benefit. SANBAG is supportive of TOD, but successful TODs will be dependent on market readiness. The CTP 2040 should take into consideration that we can create the conditions to facilitate TOD, but that the market will control how much TOD can actually occur in given areas. The dissolution of redevelopment agencies has set back the efforts of our local agencies trying to create TOD-ready environments. The CTP 2040 should stress the importance of funding that will allow agencies to better perform this important function.
4. Freight - Policy P2-S7 on Page 71 states “*Seek creation of national, state, and regional dedicated funding programs for freight transportation.*” SANBAG heartily concurs with that policy. As a national leader in freight movement, Southern California needs to maintain a robust freeway network and feeder systems (interchanges, arterials, and first/last mile connections) to major logistics centers and intermodal facilities that make their home here. At the same time, on Page 122, the CTP contains a recommendation to “*Avoid funding projects that add road capacity and increased maintenance costs.*” This recommendation seems to counter to the stated need to maintain mobility for freight, and Caltrans should consider removing the statement from the CTP 2040.
 5. Highway capacity - The addition of highway capacity is vital to accommodating the movement of freight and the growth in this sector that the CTP, itself, anticipates. The first line of Table 10 states: “*Total shipments by weight (into, out of, and within CA) are projected to grow approx. 180% statewide between 2012 and 2040.*” This is enormous growth, yielding economic benefits that we must seek to accommodate. Statistics are also provided on high future population growth rates for inland counties (Table 8). The SCAG RTP/SCS and other RTPs throughout the state have substantial capacity-related projects that

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are needed to keep Southern California (already the most congested urban area in the U.S.) functional from a mobility standpoint. The survey data cited in Figure 6 reinforces the importance of dealing with congestion. The two greatest concerns the public has about travel are highway congestion and the cost of travel (e.g. auto operating cost). Transit and non-motorized modes play an important role, but improving the highway system cannot be neglected, and this point should be acknowledged in the CTP.

HOV lanes - Page 94 of the CTP states: *“Based on discussions with the TAC and PAC, it was assumed that the completion of the statewide HOV network will not result in additional highway capacity; rather, new HOV lanes will be converted from existing mixed flow lanes. These new HOV lanes will be primarily added in interregional corridors so carpool vehicles can travel on HOV lanes in a seamless manner between regions.* Text on Page 150 further states: *“Based on consultation with the CTP TAC and PAC, no new freeway lanes will be added; mixed flow traffic lanes will be converted to HOV in all cases.”* A policy of this nature would run counter to long-standing practice throughout the state, would significantly increase congestion, and would be met by strong public opposition. The highly controversial “take-a-lane” experience on the Santa Monica freeway several decades ago taught transportation agencies important lessons on how to implement an HOV network, the foremost lesson being, never take a general purpose lane in a congested corridor.

6. Page 94 also states that *“The CTP 2040 assumes implementation of fully utilizing the existing capacity in the HOV and HOT lanes for complete system operational efficiencies.”* The statement implies that even toll express (HOT) lanes need to be carved out of existing capacity. It should be noted that the SCAG RTP/SCS contains a network of express lanes, none of which take a general purpose lane away. This network benefits freight and the general public, not just those able to pay a toll. We respectfully request that the language in the CTP be modified.
7. The goal of 80% reduction in GHGs is met only by Alternative 3, as explained in Chapter 7. Fuel efficiency and related fuel/vehicle technology improvements account for $\frac{3}{4}$ of the reductions needed to reach the 80% target by 2050, per Table 23 of the CTP. The other strategies listed in Table 17 account for the other $\frac{1}{4}$ of the reductions needed. We support the types of transportation strategies described in Chapter 7, as well as transit oriented land use strategies, wherever practical. However, we respectfully request that Caltrans re-look at some of the assumptions that may not be consistent with the feasibility criteria in AB 32, as stated earlier, as an even greater portion may be needed from vehicle and fuels technology than identified in CTP 2040.

In closing, we fully appreciate the challenge that the Caltrans and CARB analysts were facing in conducting this analysis. It has been a very difficult, yet useful and important exercise. It is a first step to determining how, in practical terms, the State and its public and private sector partners can go about addressing the ambitious goal of 80% GHG reduction reflected in the Executive Orders.

ATTACHMENT

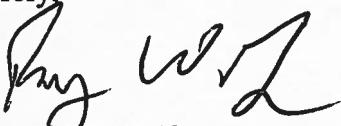
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It is important to define an achievable path to GHG reduction that both the broad array of public agencies and the private sector can endorse. The CTP 2040 can set the stage for this type of pragmatic collaboration. It can bring together both the “top down” 80% goal with the “bottom up” analysis of feasibility. Work is still needed from both ends of the spectrum, and we view the CTP 2040 to be important vehicle for continuing that discussion.

It should also be noted that achieving the GHG reduction goals in the transportation sector will be greatly dependent on the choices made by individuals and businesses (e.g. through buying zero and near-zero emission vehicles, modifying travel choices, creating fueling infrastructure, choosing locations for homes and businesses, etc.). It will be critical to understand these market dynamics as we collaboratively define a path forward on GHG reduction, in a way that is balanced with the economic needs of San Bernardino County and the remainder of the state.

We look forward to a continuing partnership in creating a mobile, sustainable, and economically vibrant California.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Wolfe", written in a cursive style.

Raymond W. Wolfe
Executive Director