



April 17th, 2015

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

Dear Mr. Corley:

I am writing to comment on the California Transportation Plan 2040 (CTP) on behalf of the California Bicycle Coalition and our network of local bicycle advocacy organizations with aggregate dues-paying membership of over 30,000 people who support our mission of enabling more bicycling. Our goal is to triple bicycling by 2020 for safer, healthier, and more prosperous communities for all Californians.

I reiterate our support of the recommendations in the April 17 letter from Climate Plan. Those comments reflect a broad consensus among bicycling advocates and our allies that the CTP 2040's focus on sustainability, climate, and mode shift represents a great direction for California's transportation system, but that its specific recommendations fall somewhat short of that promise. We deeply appreciate the opportunity to comment on the draft and look forward to working with you as you complete the final California Transportation Plan to hone its recommendations.

In this letter, I submit comments to call attention to two important specific changes not mentioned in the Climate Plan letter that we would like to see in the final draft.

1. The CTP's assumptions about bicycle mode share are too modest and the analysis of potential VMT shift is inaccurate.

The plan assumes a doubling in the number of trips by bike by 2040. This contradicts Caltrans' strategic goal of a tripling in such trips by 2020. It also represents a decline in the growth of bicycle mode share, considering that bicycling has nearly doubled in California in the last decade alone (from .8% in 2000 to 1.5% in 2010-12, according to the CA Household Transportation Survey). Some cities in California have experienced a tripling of bicycle mode share in the last decade and have plans in place to achieve a mode share of 20% by 2040. The CTP should establish a higher mode share goal in conformance with the plans of the state Department of Transportation and many of the state's local jurisdictions. *We suggest an ambitious goal of 10% by 2040 and a modest goal of 6%, a quadrupling of the current rate and modest compared to Caltrans goal of 4.5% by 2020.*

The plan's transportation model is flawed in its estimate of VMT reduction as a result of an increase in bicycle trips because it only takes into account the impact of that mode shift on personal, short-distance trips. In fact, bicycling improvements in a neighborhood entice people to replace *longer* trips. Take the example of a shopping trip: when a short bicycle trip is unpleasant or dangerous, people choose to drive; and once in the car, people choose to drive longer distances to larger discount store because the marginal cost of that longer trip is trivial. If that shopper's neighborhood were made safer for bicycling, she would replace that longer automobile trip with one or more short bicycle trips. Furthermore, by enabling residents to accomplish many kinds of goals with short bicycle trips, safely connected bicycle networks permit many people to get rid of a car or a second car, saving money and freeing up real estate for other uses.

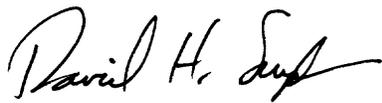
Making improvements to a community's bicycle network has cascading effects that are not reflected in the California Statewide Travel Demand Model. A better model would consider the VMT impact of improved bicycling connections on changes in car ownership and changes in trip demand, not just trip mode. *With regard to the impact of bicycle mode share on VMT, the CSTDM is so inaccurate that planners should not rely on its conclusions and nor should the CTP.*

2. An objective related to active transportation should be included in the goal "Support Economic Vibrancy."

Elsewhere in the CTP the plan recognized the impact of active transportation on the local economy. This sentence on page 69 reflects this brilliantly: "The integration of non-motorized modes can also induce Californians to support and shop at local businesses. The implementation of complete streets can serve as an attractor for local investment, business opportunities, and consumption, leading to a stronger local economy." *Therefore, a specific objective related to an increase in active transportation access to local business districts should be included in the CTP.*

Thank you for this opportunity to comment. If you have any questions, please do not hesitate to follow up with me at 916-251-9433.

Sincerely,



Dave Snyder
Executive Director