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To: ctp2040@DOT
Subject: CTP2040 45-day Public Review Period Comments

Below is the result of your feedback form. It was submitted by Steve Smith (ssmith@sanbag.ca.gov) on April 17th, 2015 at 03:06PM (PDT).

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comments: 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:

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 th!

at 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 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 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 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.

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. submit: Submit Comments