CTP2040
CALIFORNIA TRANSPORTATION PLAN

Public Notice of the 45-day Public Review Period of the California Transportation Plan (CTP 2040)

Thank you for reviewing the Draft CTP 2040 statewide long-range transportation plan document. Listed below are directions for manually submitting your input, ideas and comments specific to the CTP 2040 plan. The public comment period for this document begins Monday, March 2, 2015 and ends Friday, April 17, 2015, 5:00 PM PST.

Directions for Manually Submitting Comments

1. Fill out your contact information (please print)
2. Fill out your plan comments individually, providing as much detail as possible (please print). Please reference chapter and page numbers.
3. Submit your comments via:
   a. U.S. Mail:
      Gabriel Corley, CTP Project Manager
      Division of Planning, MS-32
      California Department of Transportation
      P.O. Box 942874
      Sacramento, CA 94274-0001
   b. Fax: (916) 653-4570
      Attn: Gabriel Corley, CTP Project Manager
   c. E-mail: Scan and send to ctp2040@dot.ca.gov
   d. In person: 1120 N Street, Sacramento, CA
      Attn: Gabriel Corley, CTP Project Manager - Division of Planning MS-32

Contact Information

We ask for your information so that we can contact you for clarification, if needed.

First Name: Tami

Last Name: Grove

Title: Statewide Development & Transportation Program Mngr

Organization: California Coastal Commission

Address: 725 Front St., Ste 300

City: Santa Cruz, CA Zip Code: 95060

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Contact Information, cont'd.

Telephone Number: 831-427-4871

Email address: Tami.Grove@coastal.ca.gove

45 Day Review Comment Form Plan Comment

Please provide as much detail to your comment as possible (attach multiple pages if necessary).

Chapter: _____ Page: _____

Comment:

See attached memo

STATE OF CALIFORNIA—NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *GOVERNOR*

CALIFORNIA COASTAL COMMISSION

45 FREMONT ST., STE. 2000
SAN FRANCISCO, CA 94105-2219
VOICE (415) 904-5200
FAX (415) 904-5400

MEMORANDUM April 17, 2015

To: Gabriel Corley
Caltrans CTP Project Manager

From: Tami Grove
Statewide Development and Transportation Program Manager

Subject: Draft CTP 2040

Thank you for providing Coastal Commission staff the opportunity to comment on this statewide long-range transportation plan document. We appreciate being included in the Policy Advisory Committee for this effort.

Our comments on the March 2015 draft follow:

1) **Add Executive Summary.** We strongly recommend adding an Executive Summary to convey the main points of this important but lengthy document. The Executive Summary should: explain the role of the plan in helping achieve the State's greenhouse gas (GHG) emissions targets; summarize the three alternatives analyzed for the reduction of vehicle miles traveled (VMT); make clear the assumptions needed to achieve the targeted VMT reductions (e.g. free public transit with doubled availability, etc.); and, highlight the most important next steps for Caltrans to take. This will allow readers, including decision-makers, to quickly grasp the future changes necessary to meet the required GHG reductions.

2) **Update references to estimated sea level rise.** California's Sea Level Rise Guidance Document, which was developed by the Coastal and Ocean Working Group of the California Climate Action Team (CO-CAT) and revised in 2013, represents the most updated sea level rise estimates at this time. Therefore, we recommend that the State's Sea Level Rise Guidance Document's estimates (see below) be used in the CTP 2040. Also, the draft CTP only references estimates as far in the future as 2030. This estimate is not adequate to address expected impacts over the duration of the planning period, nor does it represent the long-term planning that is critical for transportation infrastructure projects (generally 100+ years). We recommend references to estimates for 2030, 2050 and 2100 be provided in the relevant text sections of the report to alert readers to the anticipated risks from SLR.

Table 1. Sea-Level Rise Projections using 2000 as the Baseline

Time Period	North of Cape Mendocino	South of Cape Mendocino
2000 - 2030	-4 to 23 cm (-0.13 to 0.75 ft)	4 to 30 cm (0.13 to 0.98 ft)
2000 – 2050	-3 to 48 cm (-0.1 to 1.57 ft)	12 to 61 cm (0.39 to 2.0 ft)
2000 – 2100	10 to 143 cm (0.3 to 4.69 ft)	42 to 167 cm (1.38 to 5.48 ft)

3) **Climate Change and Greenhouse Gas Reduction Section (Page 28); we recommend revising language as follows:**

Sea-level rise (SLR) is one of the most widely documented risks of climate change, and it will affect all modes of transportation. Sea levels are expected to rise up to almost one foot~~an estimated average of 6.7 inches~~ by 2030, two feet by 2050, and over five feet by 2100. If SLR increases to the highest projected levels, it will put almost half a million Californians along the ocean coastline and the San Francisco Bay at risk from a 100-year flood event. ~~Adaptation will~~These risks require that we use the best available science to estimate SLR impacts and that we use a variety of adaptation strategies, including managed retreat and other nature-based approaches, to avoid vulnerabilities and build a resilient transportation system. ~~These~~ To achieve adaptation strategies, SLR impacts must be addressed at all project planning stages, not just at final project delivery.

California has achieved worldwide acclaim for its GHG emission reduction efforts. However, given the expected range of climate change impacts, public agencies throughout California, including Caltrans, are assessing the risks posed by potential SLR. Affected planning agencies need to address potential climate change-related vulnerabilities and incorporate climate change resiliency into their long-range transportation documents to reduce the likelihood, magnitude, duration, and cost of disruptions associated with extreme weather, increased fire danger, sea level rise and other effects of changing climatic conditions.

Climate change will significantly increase the challenge for transportation managers who will need to ensure that reliable transportation routes are available. To effectively address the challenges that a changing climate will bring, climate adaptation and GHG reduction policies must complement one another. National efforts to reduce GHG emissions in transportation explore the use of alternative fuels, new vehicle technologies, pricing strategies, public transportation expansion, and increased use of bicycling and walking as transportation modes. These mitigation efforts need to be combined with climate adaptation measures that also support a sustainable and resilient transportation system. For example, shoreline protection devices often require substantial maintenance investments and cause significant adverse impacts on coastal resources, including loss of

sandy beaches and other sensitive habitats. Therefore, careful consideration should be given to employing effective managed retreat and nature-based solutions (such as use of dunes and wetlands for protection) as adaptation strategies wherever appropriate. Supporting a sustainable environment also requires the minimization and mitigation of negative impacts emanating from necessary shoreline protection strategies.

Transportation decision-makers at all levels are beginning to consider how climate change may affect the transportation system and the levels of investment required to produce successful "co-benefits" or "wins" simultaneously across economic, environmental, and social measures from within a strategy. How these considerations are incorporated into the transportation planning process is emerging as an area of concern.

State-certified Local Coastal Programs (LCPs) operate alongside general plans in the coastal zone and are the ~~only~~ primary standard of review for coastal development permits in their respective jurisdictions. Coastal communities should utilize LCPs to plan for and implement climate change adaptation measures in the coastal zone, where the impacts of SLR are most intense. Communities will be challenged with implementing many of the climate change adaptation measures to protect both infrastructure and coastal communities, as many of the strategies can be implemented only at the local level through changes in local development policies, including LCP and general plan updates. Successful implementation of adaptation measures to reduce SLR and other climate-change-related ~~these~~ impacts will require additional funding in the future.

4) **Various recommendations for Chapter 6 *The Plan* (beginning on page 58)**

Goal 1: Improve Multimodal Mobility and Accessibility for All People

- The strategies for Goal 1 should include providing support for revising local coastal programs and general plans, in concert with regional transportation plans, when updates are necessary to allow for active, sustainable transportation and transit projects.

- The California Coastal Trail will eventually provide a continuous, non-vehicular transportation route along the entire coast of California. The Coastal Trail often includes multiple parallel strands, serving a variety of users, and may be in various forms, from unpaved hiking trails to Class I bike paths. The Coastal Trail is therefore a key resource for multi-modal transportation in the coastal zone. Given the importance of the coastal zone both in terms of its popularity and in terms of its value to California's economy, it is critical that the Coastal Trail be provided and enhanced whenever possible. Caltrans' guidelines for RTPs also note that along the shoreline of coastal counties, one element of the Complete Streets program should be the Coastal Trail. Accordingly, we recommend that a strategy be added to Goal 1 providing support for development and enhancement of the Coastal Trail.

Goal 2: Preserve the Multimodal Transportation System

- Revise the eighth paragraph, as follows:

    - *Climate change is another serious threat to California's infrastructure. Extreme weather, including events such as heatwaves, droughts, and torrential rains, is predicated for the future, which will add even more stress to pavement and bridge infrastructure. Sea level rise (SLR) is perhaps the best documented and most accepted impact of climate change, putting all modes of transportation near the coast, Delta, and Bay at risk of flooding and erosion. The level of change remains uncertain but is estimated to rise ~~an average of 6.7 inches~~up to almost one foot by 2030, two feet by 2050, and over five feet by 2100. To improve public access planning efforts, ~~more information is needed about how SLR could affect public access areas and recreation throughout the state~~these estimates should be used through SLR mapping tools to assess vulnerabilities. If shoreline armoring is allowed to occur, ~~M~~many currently accessible beach areas have the potential to become inaccessible ~~due to impacts from~~ as SLR advances. Moreover, ~~S~~shoreline armoring and emerging headlands could isolate connected beaches with sea-level rise, which will block lateral access.*

- Add a strategy requiring projects to avoid sea-level rise hazards if possible, and minimize hazard exposure if avoidance is infeasible. (Note that such as approach is also consistent with the design philosophy of Caltrans' Highway Design Manual at Section 871.2 which notes that "(t)he simplest way and generally the surest of success and permanence, is to locate the facility away from the erosive forces.") If it is not feasible to site or design a structure to be safe from sea-level rise over the anticipated life of the structure, the alternatives analysis for the project should include potential sea-level rise adaptation strategies, including steps to relocate or modify the development as needed to prevent or reduce risks to the development as well as to coastal or other natural resources. In the coastal zone, new development should not in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

- We recommend revising P1-S2 as follows: "Develop and implement a risk-based asset management plan, using cost-benefit analysis that accounts for the full cost of natural resource impacts to prioritize investments."

- We recommend adding the following strategy: Evaluate SLR and potential adaptation responses to anticipated SLR in new construction, as well as repair and replacement projects, and factor these considerations into the selection of the preferred alternative to meet the project purpose and need.

- P3-S11 should be revised to specify that adaptation strategies for sea level rise must be carried out in a manner that protects natural resources. For example, the following phrase could be added to the end of the sentence: "while protecting natural resources"

- We recommend additional performance measures, such as "facilities designed and sited outside of shoreline erosion areas accounting for sea level rise and not dependent on protective structures." Specific ways to measure this, for example, could include: number of existing lane miles in vs. out of expected 2100 SLR inundation areas, number of repaired or replaced lane miles moved out of 2100 SLR inundation areas (both through inland realignment or elevation), as well as miles of beach covered/not covered with structures protecting transportation infrastructure.

Goal 6: Environmental Stewardship

- Revise language on page 80 as follows:

    - *Depletion of fossil fuels is a greater conservation and stewardship discussion beyond just California's transportation planning. GHG emissions produced from fossil fuel use have a direct link to the environment through global warming and climate change. More than 30 million Californians living in coastal communities are vulnerable to accelerated sea level rise and shoreline erosion--threats to major transportation corridors and ports as well as other critical infrastructure along the coast. Adaptation strategies will be necessary to protect this infrastructure while preserving natural resources. California is also vulnerable to rising temperatures, changing precipitation patterns, and increased storm surge and intensity. Substantial reductions in GHG emissions are essential to combat these negative consequences of climate change.*

- **Additional Policy:** We recommend adding a policy as follows: Adapt transportation facilities to avoid future sea level rise hazards and protect coastal resources.

- **Revise Strategies:**

    - Revise strategy P2-S5 as follows: "Encourage and facilitate partnerships that integrate conservation and infrastructure planning at regional scales (such as watershed planning, Corridor Management Plans, and Natural Community Conservation Plans)…

    - Revise strategy P3-S10 as follows: "Improve links between land use planning and climate adaptation planning by using the tools such as the previous California Regional Blueprint Program and SCSs to better integrate adaptation strategies into regional plans, General Plans, and Local Coastal Programs."

- **Additional Performance Measures:** We recommend adding performance measures requiring monitoring of acreage losses/increases of wetlands and other important habitats, including sandy beaches. Other measures should include numbers of additional wildlife corridors protected, acreages of restored habitats from the removal/replacement of existing transportation facilities causing habitat harm (such

as fill of wetlands and streams), numbers of fish barriers removed, reductions in water use, acres of native vegetation planted, percentage changes in amount of stormwater runoff from roadway pavement being treated, increases in the amount of impervious surface in new and repaired transportation projects, etc.

5) Various recommendations for Chapter 8 *Recommendations and Next Steps* (beginning on page 108)

- We strongly suggest that the introduction to Chapter 8 specifically explain the overall purpose of these recommendations and relate them to the previous sections of this report that focus on GHG reduction targets and strategies. The introductions and recommendations contained in this chapter would be significantly improved by clearly laying out how the various proposed actions contribute toward (and will be evaluated by their performance in) meeting the estimated target reductions of GHG, particularly relative to VMT, as well as their relationship to the discussion of "Alternative 2" for meeting GHG reduction goals.

- To the short-range Safety recommendations, we recommend adding: Emphasize planning and funding for projects that provide a safer network of both rural and urban bike and pedestrian routes.

- 3) To the Sustainability recommendations, we suggest adding the following recommendation: Ensure that Corridor System Management Plans, Regional Transportation Plans, and other related transportation plans reflect strategies to connect the transport/access of people, goods and services in efficient ways to housing, work, recreation and public institution needs while at the same time avoid negative impacts to agricultural production areas and sensitive land and water resources; create funding decision priorities for projects that contribute toward these goals.

- In the Environmental Stewardship mid-range recommendations we suggest adding: Assist local communities in the development of integrated transportation and land use strategies to resiliently respond to climate change through their General Plans, Regional Transportation Plans and Local Coastal Programs.

- In the Climate Adaptation short-range recommendations, we recommend changing the statement to: "Coastal communities must utilize Local Coastal Programs (LCPs) alongside General Plans and Regional Transportation Plans to reduce GHG emissions and implement climate change adaptations (giving first priority to where the impacts of SLR are most intense)."

- Also in the Climate Adaptation recommendations, we suggest adding another mid-to long-range bullet: Continue planning, funding and implementing long-term solutions that will ensure that the State's transportation/access needs will be met through

sustainable transportation choices that account for, and help to mitigate, changing climate conditions.

Again, thank you for the opportunity to provide comments. As noted on the cover comment sheet, please feel free to contact me if you have any questions. My office number is (831) 427-4863.