



Central Coast Coalition
Moving California's Economy

April 16, 2015

Chris Ratekin
Acting Office Chief
Office of State Planning
Division of Transportation Planning
California Department of Transportation
P.O. Box 942874, MS-32
Sacramento, CA 94274-0001

Re: Central Coast Coalition Comments on the Draft California Transportation Plan 2040

Dear Mr. Ratekin:

The Central Coast Coalition would like to submit comments to the California Department of Transportation on the Draft California Transportation Plan 2040. The Coalition consists of the regional transportation planning agencies in San Benito, Santa Cruz, Monterey, San Luis Obispo and Santa Barbara Counties and the Association of Monterey Bay Area Governments.

The Central Coast Coalition offers the following specific comments and suggestions:

Comment #1 – Projects that increase road capacity should not be limited in blanket fashion

The Coalition acknowledges that the CTP 2040 is an aspirational document, but we are concerned that Caltrans is moving beyond its role in developing the CTP 2040 in a way that sets policy and may limit the regions' flexibility and control over prioritizing projects and future funding. Additionally, the Coalition is concerned that Caltrans is including strategies and goals that are outside of its purview and responsibility.

For example, in Chapter 8, a strategy states that the State should avoid funding projects that add road capacity. This is a concern for the Coalition in that regions have proposed some projects that add road capacity and are needed to close the gaps or add linkages. While some capacity-increasing projects may have a demand-inducing effect that runs counter to plan goals, such as reducing VMT and emissions, other capacity-increasing projects (for example, projects that upgrade interchanges, or include HOV or HOT lanes or that complete long-planned local network segments that would reduce trip distance) serve these CTP 2040 goals and should be promoted.

The draft CTP 2040 should be revised to state that it endorses selectively and strategically funding projects that add road capacity, where such projects would serve broader goals. All strategies should be revised so as to not limit region's flexibility in the types of investments that benefit both urban and rural areas as well as passenger and freight travel.

Comment #2 – Preferred Alternative

The analysis in Chapter 7 indicates that, of the three alternatives studied, Alternative 3 would be the most effective in achieving plan goals and is the only alternative that would meet the ambitious greenhouse gas targets of SB 391.

Does the plan embrace Alternative 3 as the preferred alternative and commit to implementing it? If so, the conclusion and executive summary should clearly so state. By solving several problems simultaneously, the combination of road pricing strategies and greatly enhanced transit and mode shift options, envisioned by this alternative makes intuitive sense: the pricing mechanisms reduce vehicle emissions, congestion and road wear-and-tear while at the same time providing revenue for road maintenance, mode shift options, and active transportation. This alternative proposes greatly enhanced transit and other mode improvements to reduce VMT. It also provides a response to the concern that road pricing strategies may be regressive and disproportionately burden low income groups.

Comment #3 – Systematic application of Performance Measures

The Draft CTP2040 contains a number of performance metrics relating to all various goals and strategies. However, all of the analysis and results in the document are focused on GHG and VMT. Since the CTP2040 is primarily a transportation plan, it should include a balance of all the performance metrics particularly the mobility and access goals. The draft CTP 2040 should be revised to include a systematic application of the performance measures described in Chapter 6 to the plan alternatives evaluated in Chapter 7.

Comment #4 – Funding resources for implementation of the CTP and Sustainable Communities Strategies

The funding recommendations outlined in Chapter 8 should offer solutions to the state's transportation funding crisis. The Coalition recommends this section be upgraded substantially to lay out a strategy for funding transportation in California. We believe the CTP should include strong recommendations to the Legislature to provide a dedicated long term sustainable revenue source(s) that address the significant transportation deficiencies identified in the plan.

As a requirement of SB 375, Metropolitan Planning Organizations in California are required to develop and adopt Sustainable Communities Strategies. The CTP2040 should acknowledge that adequate funding resources are also needed to implement the regions' Sustainable Communities Strategies. The CTP2040 should also include strategies that provide adequate funding resources for this purpose.

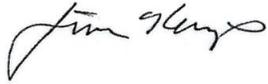
Comment #5 – Inconsistencies in funding recommendations and VMT reduction Strategies.

Chapter 7 provides three alternatives and corresponding VMT/GHG reduction strategies. These VMT/GHG strategies have been emphasized throughout the plan. The Coalition believes that the results of many of these VMT/GHG strategies outlined on Table 17 (page 91) are significantly understated. These include, for example, only a 2% increase in working at home, a 5% increase in ridesharing, and a 5% increase in car sharing. We believe the assumptions used in most of these strategies are very low and should be reassessed, especially given the increasing focus on these efforts in the CTP and regional planning efforts. We also believe the

strategies and funding recommendations pertaining to these measures in the CTP could and should be strengthened.

Thank you for your consideration of these comments and suggestions. If you have any questions, please contact SBCAG Planning Division Deputy Director Peter Imhof at pimhof@sbcag.org.

Sincerely,



Jim Kemp, Executive Director
Santa Barbara Association of Governments



Ron DeCarli, Executive Director
San Luis Obispo Council of Governments



Debra L. Hale, Executive Director
Transportation Agency for Monterey County



George Dondero, Executive Director
Santa Cruz Co. Regional Transportation Commission



Mary Gilbert, Interim Executive Director
San Benito Council of Governments



Maura Twomey, Executive Director
Association of Monterey Bay Area Governments