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June 18, 2015

Malcolm Dougherty, Director
California Department of Transportation
P.O. Box 942873
Sacramento, CA 94273-0001

Dear Mr. Dougherty:

Subject: Comments on the Draft California Transportation Plan 2040.

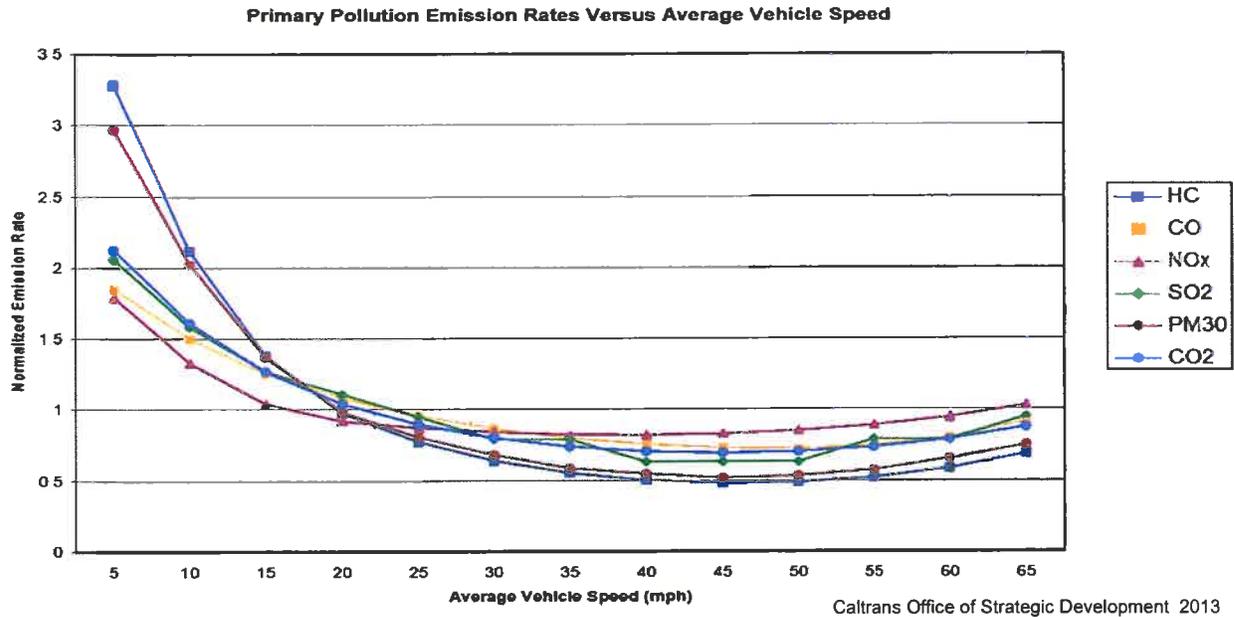
Thank you for the opportunity to review and comment on the Draft California Transportation Plan (CTP) 2040. The Nevada County Transportation Commission (NCTC) is acutely aware of the CTP's intended purpose to propose goals, policies, strategies, and establish performance measures to address the needs of California's transportation system while addressing Greenhouse Gas (GHG) reduction goals. However, based on review of the proposed strategies included in the CTP, the document does not acknowledge the transportation needs of the entire state, as identified in the Regional Transportation Plans developed and supported by the regions. In order for this plan to meet the challenges of improving California's transportation system and reducing GHG emissions, it must take a reasonably balanced and educated approach to address California's future mobility needs, support a growing economy, and achieve environmental goals.

SB 391 (2009, Lui) charged Caltrans in development of the CTP to address how the transportation sector will assist in achieving statewide reductions in GHG emissions to 1990 levels by 2020 and 80 percent below 1990 levels by 2050. SB 391 also directed Caltrans in the development of the CTP to take into consideration the use of alternative fuels, new vehicle technology, tailpipe emission reductions, and expansion of public transit, commuter rail, intercity rail, bicycling, and walking in reducing GHG emissions.

The CTP assumes all GHG reduction mandated from Executive Order B-30-15 are to be derived from the transportation sector and this is not a realistic assumption. The CTP should identify how transportation related strategies based on existing and projected financial constraints can contribute to realistic reductions in GHG emissions in conjunction with reductions forecasted from other sectors. It also should address the anticipated GHG emission reductions and strategies in relation to California Air Resources Board's Low Carbon Fuel Standard, Draft Sustainable Freight Initiative, and Greenhouse Gas Reduction Fund.

The CTP focuses primarily on methods to reduce overall vehicle miles traveled (VMT) for purposes of reducing statewide transportation related GHG emissions. One would assume that reducing VMT would lower GHG emissions by a similar percentage, but it is not that simple.

Multiple studies, as well as the chart below, prepared by Caltrans, have shown that GHG emissions are directly related to fuel consumption and fuel efficiency, in direct correlation to the speed of a vehicles operation.



The CTP strategies ignore the fact that as traffic congestion increases and speeds are reduced resulting in additional acceleration and deceleration, vehicle idling, and reduced fuel efficiency; these congestion related vehicle emissions of CO₂ are higher per vehicle mile traveled. Statements included in the CTP, such as “avoid projects that add road capacity” and “any transportation projects on State Highway System or on local streets that are capacity increasing should not be supported for funding” should be removed. These types of strategies will actually result in increased GHG emissions and are in direct conflict with adopted Regional Transportation Plans and with statewide goals to improve safety, mobility, goods movement, and reduce GHG emissions.

Most people recognize that driving contributes to GHG emissions, but they erroneously conclude the best way to measure reduction of these emissions is a direct correlation with reducing VMT, without accounting for how carbon emissions change with vehicle speed and congestion. While certain strategies within the CTP may result in reduced VMT, they might also have the unintended consequence of actually increasing congestion related GHG emissions.

NCTC supports the letter submitted the California Transportation Commission and believes that it critical that information presented in this document should be as accurate as possible. NCTC supports the recommendation for peer review by industry or other experts be performed.

Thank you again for providing the opportunity to comment on the Draft CTP 2040.

Sincerely,

Daniel B. Landon
Executive Director

cc: Katie Benouar, Chief
Caltrans Division of Planning

Assemblyman Brian Dahle
First Assembly District

Ms. Lucetta Dunn, Chair
California Transportation Commission

Senator Ted Gaines
First Senate District

Will Kempton, Executive Director
California Transportation Commission