



Tuolumne County Transportation Council

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California Transportation Plan 2040 Comments

Thank you for extending the comment period for the Draft California Transportation Plan 2040. We are writing to Caltrans to strongly **oppose** the following recommendation in the Draft CTP 2040, “avoid funding projects that add road capacity and increase maintenance costs,” from page 122 in the Invest Strategically section. Investing in road capacity projects has provided tangible benefits that have helped improve the economy, congestion, safety, and air quality in Tuolumne County and other rural areas.

We highlighted the vital fiscal importance of adding road capacity projects to the Interregional Road System in a joint comment letter we sent along with Alpine, Amador, and Calaveras to Caltrans on the 2015 Interregional Transportation Strategic Plan (ITSP).

- Interregional Recreational travel is a key component of the economy of Tuolumne County. Recreational travel was not used as criteria for determining the 11 Interregional Strategic Corridors listed in the 2015 ITSP.
- Experience has shown that unaddressed congestion on rural State Highways often leads to high fatality and accident rates resulting from unsafe passing movements. Road and intersection capacity improvements on rural highways have contributed to improved safety.
- Increased congestion and travel time delay along rural routes causes additional greenhouse gas (GHG) emissions which are in direct conflict with AB 32 and Governor Brown’s Executive Order B-30-15 to reduce GHG emissions.
- We do not currently have passenger rail or public transit service available for interregional travel along the SR 108/120/49 corridor from Tuolumne County to our nearest urbanized area in Stanislaus County (City of Modesto). We look forward to working with Caltrans to find funding options to help provide alternative modes of transportation along the SR 108/120/49 Corridor.

The CTP 2040 should be a well-balanced multi-modal transportation system that is reflective of the entire State. We agree with the California Transportation Commission's staff CTP Comment Letter that summarizes the Draft CTP 2040. "Issues related to ensuring mobility, connectivity and economic development as required by Government Code Section 65071 appear secondary to the plan objectives. To promote a robust economy and quality of life, the plan must balance statewide goals and objectives to provide for a comprehensive multimodal transportation network well into the future." Unfortunately, the plan divests from their goal by proposing urban solutions in rural areas.

The recommended policy "avoid funding projects that add road capacity" is inconsistent with Government Code Section 14529.4, "the commission may include capacity-increasing projects in the adopted State Transportation Improvement Program (STIP)." Avoiding road capacity projects is inconsistent with the 2015 ITSP which focuses on expanding the capacity of the State's Interregional Road System (IRRS) "that are outside the boundaries of an urbanized areas of a population of more than 50,000," to supplement rural areas' lack of funding. This policy would be more appropriate in a large metropolitan organization's (MPO's) Regional Transportation Plan. MPO's have access to reliable forms of passenger rail and public transit and would be better suited place for this type of language than a statewide policy.

Adding road capacity projects in the future will not prevent California from reducing greenhouse gases or achieving its ambitious B-30-15 goals in the future because of the increase in more fuel efficient cars and an increase in Zero Emission Vehicles (ZEV).

- The Air Resources Board (ARB) is soliciting ideas (June 17, 2015) to reduce petroleum use by 50% in our cars and trucks over the next 15 years.
- The State's aggressive Zero Emission Vehicles (ZEV) Action Plan plans to increase ZEV's to 1.5 million by 2025. This should significantly reduce GHG emissions from the transportation sector. With the significant increase in ZEV's anticipated, the relationship between reducing vehicle miles traveled and reducing greenhouses gases will change in the future.
- It must be understood that in many rural areas a new road or bypass connection (East Sonora Bypass Stage II) can significantly reduce regional and interregional vehicle miles traveled, travel time delay, and greenhouse gas emissions.
- Increasing service or expanding infrastructure for alternative modes of transportation in rural areas cannot be completed without a substantial funding increase. No such funding program exists for rural areas with Cap & Trade funds being disproportionately allocated to the metropolitan areas.

- The CTP 2040 focuses on achieving this ambitious goal by recommending policies that will reduce greenhouse gas emissions such as Vehicles Miles Traveled (VMT). While Tuolumne County has identified opportunities to potentially reduce VMT, (Regional Blueprint Greenhouse Gas Study), there is a significant need for more funding towards alternative modes of transportation. Rural areas are not seeing their complete Cap and Trade funds “returning to the source” and without more funding, the CTP 2040 will not see their VMT reduction policy attained in rural areas.

If you have any questions about Tuolumne County’s plans to reduce GHG emissions our lack of funding, to implement such plans, or opportunities for the State partner with rural transportation agencies to positively reduce GHG emissions, please contact me at 209-533-5583.

Sincerely,



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C: Katie Benouar Chief – Division of Transportation Planning
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