



Automobile Club of Southern California

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Mr. Gabriel Corley
CTP Project Manager
Division of Planning, MS-32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001

Subject: Comments on California Transportation Plan (CTP 2040) Final Draft

Dear Mr. Corley:

The Automobile Club of Southern California, with over 6 million members in the 13 Southern California counties, appreciates the opportunity to review the final draft of the CTP 2040 document. Although the document has undergone a significant redrafting, the major thrust remains the same, so we would like to re-state some comments we provided in response to the previous 2015 draft CTP 2040.

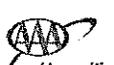
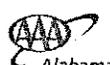
As with last year’s draft, the final draft CTP 2040 provides a good source of basic information regarding the separate modal plans that Caltrans produces and the status of the overall state transportation system. The discussions of demographic trends, financial constraints, and greenhouse gas emission reduction goals highlight the issues and challenges facing Californians as we attempt to address the travel demands of a growing state.

Prior CTPs focused on goods movement and interregional connectivity issues, while this draft CTP 2040 is focused primarily on greenhouse gas emissions. Based on state and federal planning requirements, a long-range planning document for the state would be expected to include equal treatment for other issue areas such as mobility, safety, economic development, connectivity and accessibility.

Regarding the future of the state highway system, this draft plan clearly focuses on a “fix it first” strategy stressing the use of available resources to maintain and rehabilitate the existing system. The Auto Club supports this general approach. The state has fallen behind when it comes to keeping our transportation network – highways, transit facilities, and local roads – in a good state of repair. We

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concur that maintaining the huge investment that has already been made in our transportation infrastructure must be a priority.

However, we are concerned that the plan’s “fix it first” strategy could become a “fix it only” strategy for the state’s highways. We appreciate the changes that have been made in this draft of the plan that would allow for cost-effective highway improvements; however, the language regarding such improvements stresses improved management strategies and multimodal corridor solutions, which are important, but, in some cases, additional lanes may be warranted. With the possible exception of freight-related projects, the plan clearly steers away from any added highway capacity and relies on transit, bicycle and pedestrian improvements to meet the travel needs of the 10 million additional people that are expected to live in California by 2040. While we do support improvements to, and better integration of, all modes to enhance the overall transportation system, it’s hard to imagine that a 26% increase in population (38 million today to 48 million in 2040 as stated in the plan) can be served without at least some added capacity to the state highway system.

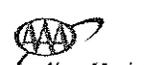
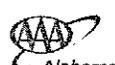
The main focus area of the plan is clearly the issue of reducing greenhouse gas emissions. The plan contains many strategies and recommendations related to reducing vehicle miles traveled (VMT) and charging motorists to pay for improvements to alternative modes in an effort to reduce greenhouse gas emissions. We do appreciate the recognition given in the plan to reducing vehicle hours of travel (VHT) and vehicle hours of delay (VHD) as effective ways to reduce greenhouse gases and improve mobility and accessibility. Free flowing roadways have a demonstrated positive effect on reducing greenhouse gas emissions.

It was interesting to note that, in the “theoretical” analysis of the three alternative scenarios for meeting the state’s greenhouse gas reduction goals in Chapter 3, even with some extremely ambitious assumptions regarding increased driving costs, the addition of bicycle and pedestrian facilities, and a huge expansion of transit services, the greenhouse gas reduction goals would not be achieved. The analysis showed that a more direct approach involving a major turnover of the vehicle fleet to electric and other alternative fuel vehicles would play a much more significant role in meeting the established goals - and most likely in a much more cost-effective manner as well, although the analysis in the plan did not consider the relative cost-effectiveness of the strategies being recommended. The addition of such a cost-effectiveness measure, such as the cost per ton of GHG reduced, as part of the analysis would be useful to determine which of the various strategies proposed offer the best “bang for the buck.”

The Clean Air Act requirements were met over the last several decades, not by shifting significant numbers of people into alternative modes and reducing auto travel, but by making major technological

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improvements to vehicle engines and fuels. The same approach may be the best way of meeting the greenhouse gas reduction goals as well. As vehicles become cleaner and cleaner over time, the relationship between reducing VMT and reducing greenhouse gases will become weaker and weaker. The plan's recommendations and strategies should more clearly address the benefits of accelerating the transition to cleaner, more efficient vehicles and cleaner fuels. In the technology area, the plan also should more fully consider the impacts of autonomous vehicles in terms of safety, mobility, capacity, and related issues.

Finally, we have a basic concern about the various strategies involving increasing charges on motorists to fund other programs and services. We believe that transportation fees, tolls, and taxes charged to motorists must fairly represent their use of the system and that all transportation system users and beneficiaries (including commercial trucks, transit riders, and landowners) should bear a proportionate share of financing the system.

Thank you for the opportunity to provide our comments on CTP 2040. We hope that you will take our comments into consideration.

Sincerely,

Craig H. Scott
Principal Transportation Policy Specialist

