



March 29, 2016

Mr. Gabriel Corley
CTP Project Manager
Division of Planning, MS-32
California Department of Transportation
P.O. Box 942874
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Subject: Comments Regarding Final Draft Review of the California Transportation Plan 2040

Dear Mr. Corley:

The Riverside County Transportation Commission (RCTC) appreciates the opportunity to comment on the Final Draft of the California Transportation Plan 2040 (CTP 2040). Caltrans' effort to develop a first-of-a-kind plan demonstrates how the state will achieve statewide Greenhouse Gas (GHG) emissions reductions and we commend Caltrans for developing a plan that provides a vision and strategies that will guide local and regional efforts towards achieving the goals of AB 32 and Executive Order S-3-05. RCTC has concerns on how this document is perceived by legislators and the general public and hope that clarifications to the document can be made to remove any misunderstandings on the process local and regional governments undertake to meet GHG emissions targets set by the California Air Resources Board (CARB).

In addition to associating ourselves with the comments you are receiving from the Southern California Association of Governments (SCAG), San Diego Association of Governments (SANDAG), San Bernardino Association of Governments (SANBAG), and the Orange County Transportation Authority (OCTA), we are requesting the following clarifications be outlined in the document:

Regional Transportation Plan/Sustainability Communities Strategy (RTP/SCS)

Under SB 375, Metropolitan Planning Organizations (MPOs) are required to develop an SCS component as part of its RTP. The SCS component captures local and regional efforts that are in place, such as land use and GHG emissions reductions strategies, in addition to planned and future actions that demonstrate GHG emissions targets are met. Since California is such a large and diverse state, each MPO has worked with its constituents to develop strategies that work for its respective region. There are inherent differences in the types of strategies the MPOs employ to meet its respective GHG reduction target. Yet, the CTP 2040 hones in on strategies that are geared towards higher population densities. *The CTP 2040 should build upon the already approved RTP/SCS's instead of using a top-down approach.*

Capacity

We understand the concern associated with capacity improvements inducing vehicle miles travelled (VMT). However, areas that have experienced high population growth in the past few decades, like those in the Inland Empire (Riverside and San Bernardino counties), have not completed a full and efficient system of state and regional arterials. These two counties are incorporating many of the GHG reduction strategies in the Southern California Association of Governments (SCAG) RTP/SCS, but in order to provide an adequate transportation system that will carry transit, freight, automotive vehicles, and bikeways, capacity improvements are still necessary for mobility, economic, and quality of life purposes. The CTP 2040 promotes transit, rail, High Occupancy Vehicle (HOV), toll lanes, and active transportation, which is an integral part of Riverside County's multimodal network. However, areas that provide affordable housing per the State's Regional Housing Needs Assessment process are in dire need of capacity improvements to accommodate multimodal travel.

For example, Riverside County covers 7,303 square miles. In some areas, cities and towns can be 20 to 30 miles away from neighboring communities. In order to connect these cities and towns, new corridors must be implemented. These corridors will provide a more direct connection between cities providing them access to employment centers, hospitals, schools, shopping, etc. This direct connection will eliminate longer, circuitous routes that are currently driven by cars, buses and trucks. The planned corridors will include bus rapid transit, HOV and/or HOT lanes, and bicycle and pedestrian facilities in addition to general purpose lanes. These improvements will allow Riverside County to meet the demands for affordable housing, and address jobs/housing balance, transit and interregional freight movement – all of which are consistent with the CTP 2040 priority on economic prosperity. Therefore, *we request the CTP 2040 recognize the need for capacity improvements that incorporate VMT reduction strategies, such as transit, HOV/HOT, and bicycle and pedestrian improvements.*

VMT Reduction Strategies

The VMT reduction strategies are most appropriate for linking high density employment areas with high density population areas. Lower density areas are implementing strategies that are best suited for their future. One of the stated goals in the CTP 2040 is preserving the unique character of California's communities. *The CTP 2040 should recognize that the housing market will not support the densities needed to support some of the VMT reduction strategies, nor will those strategies preserve the unique character of some of Riverside County's communities.*

Additionally, in several places, including the Preface, the CTP 2040 mentions that Californians drive more VMT than any state in the nation. Given California is by far the most populous state in the Union, this data point is not surprising. *It should be clarified as to whether this statistic refers to VMT per capita or total volume.*

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Funding

Funding should reflect realistic assumptions. We are concerned that the overall funding amount identified to meet GHG emissions reductions will be misconstrued. Although the SCAG region is adopting its second RTP/SCS, the state has yet to create a funding source that adequately funds the GHG-reducing projects contained therein. *The CTP 2040 should reflect the realities of available funding, and highlight that the document reflects a financially unconstrained plan for demonstration purposes.*

Other Criteria Pollutants

The CTP 2040 is focused on meeting GHG reduction goals. However, the RTP/SCS is required to meet other criteria pollutant standards. The document should strengthen this discussion and reflect the significance of RTP/SCS's meeting National Ambient Air Quality Standards in addition to GHG reduction targets. It can be argued that in the Inland Empire, the issue of criteria pollutants is a much more apparent and pressing public health concern. *The CTP 2040 should also include an analysis of the other criteria pollutants or indicate that meeting GHG emissions reductions goals alone may offset other criteria pollutants that must be met under federal air quality conformity requirements.*

CTP 2040 Recommendations

It is unclear how the recommendations are to be implemented, especially since the plan is financially unconstrained and has only a singular focus on reducing GHG. *Since the RTP/SCSs govern and guide local and regional land use and transportation decisions and actions, and the RTP/SCSs already incorporate some of these recommendations, the CTP 2040 recommendations should only serve as guidance.*

Technological Advances

Vehicle fuel technology advances are assumed at an accelerated level and will be the primary strategy to meet GHG reduction. *Therefore, the emphasis on VMT reduction strategies, including pricing strategies not included in RTP/SCSs, should be revisited to be more aligned with the realities of what can be achieved through VMT reduction strategies.*

Public Involvement

We concur that mobility choices are essential to planning sustainable and prosperous communities. The Preface to the CTP 2040 makes some overly broad statements about what Californians want that are not supported by findings in Riverside County. A statistically valid public opinion survey conducted by RCTC in 2015 showed that 58 percent of voters felt that "widening congested highways in the county" was a high priority, while only 29 percent of voters felt that building new bike lanes was a high priority. Expanding rail options was a high priority for 33 percent of respondents. While the data does reflect the desire of many Riverside County voters to diversify their mobility options, they remain strongly in favor of increasing the capacity of the highway system. *The CTP 2040 Preface should avoid*

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the colorful manner in which it over-generalizes the attitudes of all Californians towards congestion reduction strategies.

Finally, RCTC public opinion data supports the conclusions in CTP 2040 that maintenance of the existing road network is of paramount importance. Voters in Riverside County consistently place "fix it first" projects as their highest priority.

Thank you for the opportunity to provide comments on the CTP 2040. We look forward to working with Caltrans in achieving the goals and objectives set forth by SB 391. If you have any further questions please contact me or Shirley Medina at (951) 787-7141.

Sincerely,



Anne Mayer
Executive Director