



Public Notice of the 30-day Public Review Period of the California Transportation Plan (CTP 2040)

Thank you for reviewing the Draft CTP 2040 statewide long-range transportation plan document. Listed below are directions for manually submitting your input, ideas and comments specific to the CTP 2040 plan. The public comment period for this document begins Monday, February 29, 2016 and ends Tuesday, March 29, 2016, 5:00 PM PST.

The CTP is a statewide, long-range transportation policy plan designed to meet California's future mobility needs and reduce greenhouse gas (GHG) emissions. The plan envisions a fully integrated, multimodal, sustainable transportation system that supports economic vitality, protects natural resources, promotes the health and well-being of all Californians, and meets people's needs equitably.

Directions for manually submitting comments:

1. Fill out your contact information (please print)
2. Fill out your plan comments individually, providing as much detail as possible (please print). Please reference chapter and page numbers.
3. Submit your comments via:
 - a. U.S. Mail:
Gabriel Corley, CTP Project Manager
Division of Planning, MS-32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001
 - b. Fax: (916) 653-1447
Attn: Gabriel Corley, CTP Project Manager
 - c. E-mail: Scan and send to ctp2040@dot.ca.gov
 - d. In person: 1120 N Street, Sacramento, CA

Attn: Gabriel Corley, CTP Project Manager - Division of Planning MS-32

Contact Information

We ask for your information so that we can contact you for clarification, if needed.

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Plan Comment

Please provide as much detail to your comment as possible (attach multiple pages if necessary).

Chapter: _____ Page: _____

Please see attached comments.

Tulare County Association of Governments (TCAG) CTP 2040 Comments



Chapter 1: Vision

The California Transportation Plan (CTP) is a statewide, long-range transportation plan to meet California's future multimodal mobility needs and reduce greenhouse gas (GHG) emissions. The CTP defines performance-based goals, polices, and strategies to achieve our collective vision for California's future statewide, sustainable, and integrated multimodal transportation system.

Key to this vision is considering the 3 Es of sustainability: a prosperous economy, human and environmental health, and social equity. These principles are interconnected and support a sustainable transportation system that encourages economic vitality, protects our natural resources, promotes the health and well-being of all Californians, and meets people's needs equitably. Caltrans has embraced these principles and incorporated them into the CTP. A commitment to the 3 Es calls for new approaches drawn from a full set of transportation strategies that include integrating transportation and land use to create more sustainable communities.

The CTP 2040 indicates that the 3 Es: Economy; Environment; Equity are interconnected, and implies (in graphic on page 18), that these considerations should be equally weighted. However, **considerations of environment and equity are indeed dependent on a robust and prosperous economy.**

The SJ Valley has yet to experience the prosperity of the coastal areas and it is difficult to argue that the coastal areas have better metrics than the SJ Valley with respect to environment and equity concerns.

It is interesting that the state requires the SJ Valley to develop integrated communities similar to the coastal areas of the state, but without the prerequisite of prosperity. Rather **the SJ Valley is relegated to adapting urban solutions in poor rural communities and small cities without the means to actually do so.**

Goals, Recommendations, and Next Steps (in Executive Summary)

Page 15 starts the list of overall CTP goals and implementation highlights. The first bullet highlights "Improve Transit." The only type of transit mentioned in this important summary of goals and implementation of the CTP is High Speed Rail. All types of transit should be included here.

Chapter 2: Transportation System

General Discussion

The CTP 2040 does a good job of describing the existing transportation system and documents the shift in mode percentage over the past decade with the CHTS (Table 10). The plan also documents the changing needs of the

millennial generation and an aging population. **More in depth discussion seems to be missing regarding different types of transit overall in the CTP.** Transit is implied as fixed route and rail throughout. There is a brief comment about carsharing, delivery services, etc., but they are quite understated. These populations, as one example, will rely on different types of transit such as community shuttles, paratransit, carsharing, bike sharing, etc. Paratransit is quite understated in the context of this CTP.

The plan recommends a fix-it first approach to the existing transportation system valued at \$1.2 trillion and an emphasis on developing transit and active transportation. It is important to consider that fix-it-first does not necessarily mean that capacity increasing projects do not qualify under this standard. **While most highway/freeway facilities in the urban areas of the state are built out, there are highly used facilities in the SJ Valley that have yet to be brought to an efficiently functioning level. In other words, fixing some existing routes does require capacity projects, specifically facilities with high, and growing, rates of goods movement traffic- particularly State Route 99.**

Figures 4 through 7: Transportation System Mapping

The addition of a bikeways map would be an excellent fit here.

High Speed Rail Discussion

Regarding discussion related to High Speed Rail, support should be included for communities planning connectivity to regional station areas, such as Tulare County communities connecting to Hanford in Kings County.

Tribal Transportation Discussion

What is the state's strategy for increasing attention and funding to transit and active transportation improvements on tribal lands and connections to nearby off-reservation highways and communities? The discussion about the need is here in Chapter 2, but without listed sources or strategies.

Regional and Local Land Use Considerations

Preservation of agricultural land, especially in the Central Valley, should be considered as a state-wide opportunity and challenge for long-range transportation system planning. For example, taking into consideration the efficiency of agricultural goods movement on a regional level as well as state-wide.

Chapter 3: Modeling Theoretical Transportation Scenarios

The CTP 2040 analyzes three transportation scenarios utilizing the Caltrans CSTDM travel demand model; ARB's EMFAC and VISION air quality models; and the TREDIS transportation/economic development impact model. The basic metrics used for comparison are vehicle miles traveled (VMT); vehicle hours of travel (VHT); and vehicle hours of delay (VHD). The plan stresses that strategies that reduce VMT resulting in GHG emission reductions can also have the benefit of improving VHT and VDH.

Fundamentally the CTP 2040 is based upon the goal of several state laws (AB 32) and executive orders to significantly reduce GHG emissions by the year 2050. Each scenario is based upon a corresponding level of reductions called for by the various state actions. The CTP also incorporates the features of several other statewide long-range plans including: Interregional, Freight, Rail, Aviation, Transit, and Bike/Ped Plans (Table 3).

Scenario 1 Comments

Scenario 1 contains the RTP/SCS assumptions of land use and transportation investments of the various MPO regions of the state consistent with AB 32 and SB 375 goals. The “big four” MPOs focused on:

- Expansion of transit capacity, frequency and connectivity;
- Higher proportion of funding for walking and biking projects;
- More investment in “managed lanes” on the state highway system;
- Greater focus on more efficient land use and denser development near transit;
- Support for streamlined CEQA review of eligible projects; and
- Greater coordination between government and stakeholders.

The CTP, however, only takes into consideration and notes the major elements these four RTP/SCSs; all San Joaquin Valley RTP/SCSs were adopted in 2014 and not taken into consideration this directly. While the majority of the “big four” points above (less the managed lanes bullet point) were encompassed in all RTPs, SJ Valley MPOs have much different needs and scenario limitations relative to the very rural and relatively small communities that exist in the region. Great focus in many SJ Valley RTP/SCSs is also directed to alternative types of transit, such as vanpooling, increasing mode choice and availability, improving goods movement on roads (local and state) and rail lines, considering agricultural conversion and protections, and many other issues not highlighted in those of the “big four” noted here.

Economic Analysis- Impact of Transportation GHG Reduction Strategies

It is stated that “[...] the increase in vehicle operating cost would have short-term negative impacts from increased costs of driving borne by motorists. However, along with modeled enhanced transit service and free fares, is reduced congestion, improved travel conditions, and opportunity for spatial agglomeration of markets and labor that expand economic activity.” Again, much of this is not applicable to the SJ Valley and would cause inequality in costs borne by motorists. Rural and agricultural region layouts are not conducive to seeing great improvements in travel patterns, congestion, and travel conditions by increased transit service, at least certainly not to the same degree.

Policy 3 (page page 113, first bullet)

● Use SCSs to continue the Regions’ lead role in in managing transportation and land use to meet regional GHG targets. **It is an important distinction; MPOs manage transportation planning and projects, but land use is managed by local jurisdictions. Ultimately, the land-use related GHG reductions, while are modeled and planned for in SCSs, are the responsibility of local land use authorities.**

Modeling Assumptions and Policies

Overall the CTP 2040 modeling assumptions are consistent with the state of practice used by MPOs for RTP/SCS GHG analysis. And it is understood that these are theoretical scenarios built to meet the state GHG reduction goals. But **certain policy strategies have limited applicability in the SJ Valley or may indeed have a disproportionate impact on SJ Valley residents:**

Urban Congestion Charge (Appendix 7 page 11) has limited applicability as the SJ Valley does not experience significant urban congestion.

ZEV Assumptions (Appendix 7 page 21) It is unlikely that the SJ Valley will have the disposable income required to enter the ZEV market at the same rate as our wealthy coastal neighbors. **The assumption that ZEVs will make up 20% of fleet sales in the SJ Valley by 2030 does not seem economically achievable in this region. Additionally, with the rural and agricultural structure of the SJ Valley, a small electric vehicle with limitations on mileage is**

less functional. This would be coupled with fewer charging stations and/or available stations at greater distances.

HSR Ridership (Page 77) Scenario 2 &3 HSR ridership doubling is highly questionable.

VMT Tax (Page 32) A VMT tax, especially a progressive version, would likely have a disproportionate effect on the SJ Valley both from a rural community and agriculturally based economy perspective and from a Bay Area commuting perspective. Revenues from a VMT tax could conceivably be allocated to the coastal areas per state formula and/or under grant guidelines that favor urban areas over rural with respect to transit oriented development and complete streets projects.

Chapter 4: Achieving Success

Thank you for the opportunity to submit comments on the draft California Transportation Plan 2040. TCAG looks forward to working with the state, regions, and all partners on continuous transportation improvement- moving goods and people throughout a prosperous California.