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April 2, 2015

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Re: SBCAG Comments on the Draft California Transportation Plan 2040

Dear Mr. Ratekin:

The Santa Barbara County Association of Governments (SBCAG) commends Caltrans on the completion of its draft California Transportation Plan 2040. The CTP 2040 states a comprehensive vision for the future of transportation in California and puts the state on a course to solve many of the central transportation issues confronting us. The plan addresses the core issues of projected population growth and the resulting increase in transportation demand, as well as important social equity, public health and environmental challenges, especially vehicle greenhouse gas emissions and climate change adaptation. Critically, it highlights the central problem of the massive shortfall in funding needed both to maintain our existing infrastructure and to retool our transportation system to address the myriad challenges we face.

SBCAG offers the following specific comments and suggestions:

1. **Preferred Alternative.** The analysis in Chapter 7 indicates that, of the three alternatives studied, Alternative 3 would be the most effective in achieving plan goals and is the only alternative that would meet the ambitious greenhouse gas targets of SB 391. Does the plan embrace Alternative 3 as the preferred alternative and commit to implementing it? If so, the conclusion and executive summary should clearly so state. By solving several problems simultaneously, the combination of road pricing strategies and greatly enhanced transit envisioned by this alternative makes intuitive sense: the pricing mechanisms reduce vehicle emissions, congestion and road wear-and-tear while at the same time providing revenue for road maintenance and active transportation. This alternative proposes greatly enhanced transit to reduce VMT and in response to the concern that road pricing strategies may be regressive and disproportionately burden low income groups.

2. **Consistency with adopted RTP-SCSs.** We are pleased that all alternatives analyzed incorporate and reflect the adopted regional SCSs and recognize their central importance to the CTP 2040.

3. **Road Pricing Strategies as Key.** The CTP 2040 should highlight up front the connection between the funding problem, achievement of plan goals and roadway pricing strategies. Roadway pricing strategies appear to be the key in that they simultaneously solve both the operational challenges and the funding issues. Caltrans' modeling indicates that by far the most effective measure for reducing VMT, roadway congestion and vehicle emissions is road pricing strategies, which alone achieve 17% reductions in VMT by 2040 against the 2010 baseline. The plan does not make sufficiently explicit, however, that roadway pricing strategies also solve the funding issue, or make the connection between the funding issues and achievement of the plan goals.

4. **Systematic Application of Performance Measures.** The draft CTP 2040 should be revised to include a comprehensive and systematic application of the performance measures described in Chapter 6 to the plan alternatives evaluated in Chapter 7. As drafted, Chapter 7 shows only selected performance measures, such as VMT and GHG emissions. Either in the body of the plan or in an appendix, the plan should include a table or tables showing how the three alternatives performed against <u>all</u> listed Chapter 6 performance measures, organized by plan goal. New performance measures should be added to assess the plan alternatives' performance with respect to meeting the funding shortfall challenge.

5. **MAP-21 Performance Measures and Target-Setting.** MAP-21's requirements for specific performance measures and setting of targets by the State are addressed only in Chapter 1 in general terms. Although MAP-21 performance measures have yet to be finalized, they should also be addressed in Chapter 6, together with the plan's other performance measures. How will the State set targets for these performance measures that support State goals and statutory requirements?

6. **Baseline Comparison**. Caltrans should consider comparing plan performance against a future 2040 "business as usual" baseline, as well as a current baseline. A future 2040 baseline may provide a more meaningful basis of comparison than the current baseline in some instances. Caltrans should also consider including comparison to a back-cast 2005 base year to allow for direct comparison with regional SCSs, which typically use 2005 as their base year. By the same token, the CTP 2040 should include model results for 2035, which is an SB 375 target year. Right now, the draft plan evaluates alternatives performance in 2040, but not 2035, and so is not in sync with SB 375 and does not allow direct comparison to regional SCS forecasts.

7. **Technical Model Documentation.** The CTP 2040 should make available all relevant model documentation. It should state in more detail exactly what modeling was performed, using what network and land use assumptions. Chapter 7 states "CTP 2040 analytics were conducted "using software tools such as" the CSTDM, ARB's Vision Model and TREDIS, but does not give much by way of details.

8. **Implementation.** How will the plan be implemented concretely? Right now the CTP 2040 is long on generalities, but short on specifics. Without more concrete discussion of implementation steps, it is not clear what practical effect, if any, the plan will have.

The plan needs to be made real by, among other things, finding funding for SCS planning and implementation. The plan does a good job of identifying the state's transportation funding needs and the imperative to find new funding sources.

9. **California Environmental Quality Act (CEQA) Compliance.** The plan should describe how it will comply with CEQA and reference any environmental document or applicable CEQA exemption.

Thank you for the opportunity to comment on the draft CTP 2040. Please feel free to contact SBCAG Planning Division Deputy Director Peter Imhof at pimhof@sbcag.org with any questions.

Sincerely yours,

Jim Kemp
Executive Director

cc: File (SP 60-01)