



April 9, 2015

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

**SUBJECT: Comments on the Draft California Transportation Plan 2040**

Dear Mr. Corley:

Thank you for the opportunity to review the Draft CTP 2040. The following comments are offered for your consideration:

- AMBAG acknowledges that the CTP2040 is an aspirational document but we are concerned that Caltrans is moving beyond its role in developing the CTP2040 in a way that is setting policy that limits the region's flexibility and control over prioritizing projects and future funding. Additionally, AMBAG is concerned that Caltrans is including strategies and goals that are outside of its purview and responsibility.

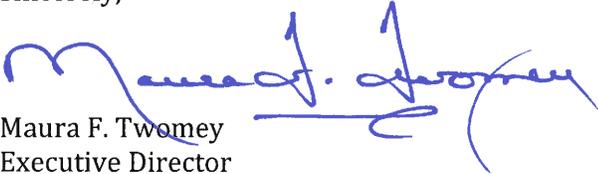
For example, in Chapter 8, a strategy states that we should avoid funding projects that add road capacity. This is a concern for AMBAG in that we still need to close the gaps and that our region relies heavily on our local roads and highways for goods movement. All strategies should be revised as to not limit region's flexibility in the types of investments that benefit both urban and rural areas as well as passenger and freight travel. AMBAG suggests re-wording to "Strategically fund projects that add road capacity."

- The CTP2040 document should better incorporate the established regional transportation planning process that is fiscally constrained, CEQA reviewed, and involves a much more cohesive public participation process.
- AMBAG is concerned that many of the CTP2040 strategies conflict with each other in terms of prioritizing the types of projects needed to meet the state's goals (e.g. reduce GHG and increase Active Transportation but expand goods movement and economic development). We suggest that the strategies be re-evaluated to eliminate such conflicts.
- The Draft CTP2040 contains a number of performance metrics relating to all various goals and strategies, however, all of the analysis and results in the document are focused on GHG and VMT. Since the CTP2040 is primarily a transportation plan, it should include a balance of all the performance metrics particularly the mobility and access goals.

- AMBAG is concerned that the CTP2040 assumes the entire GHG/VMT reduction mandate from Executive Order (EO) S-3-05 is coming from the transportation sector and not shared between all sectors.
- The CTP2040 should acknowledge that adequate funding resources are needed to implement the regions' Sustainable Communities Strategies. The CTP2040 should include strategies that provide adequate funding resources.
- Table 23 in the Draft CTP2040 indicates that there is an increase in GHG from 2040 to 2050. Please provide clarification as to why the GHG results increase from 2040 to 2050.

Thank you for the opportunity to review and comment on the Draft CTP2040. If you have any questions, please contact Heather Adamson of my staff at (831) 264-5086.

Sincerely,



Maura F. Twomey  
Executive Director