



April 17, 2015

Gabriel Corley, CTP Project Manager
Division of Planning, MS-32
California Department of Transportation
1120 N Street
Sacramento, CA 95814

Submitted via email to ctp2040@dot.ca.gov

Re: comments on the California Transportation Plan (CTP 2040)

Dear Mr. Corley:

I am submitting these comments on the California Transportation Plan (CTP 2040) on behalf of more than 150,000 Sierra Club members statewide. Our members have a keen interest in transportation issues, particularly given transportation's impacts on habitat, air and water quality, and climate disruption.

Our comments begin with the Planning Framework (pages 7-15) where "California's Climate Future: The Governor's Environmental Goals and Policies Report" is cited. That report begins with a quote from "Scientists' Consensus on Maintaining Humanity's Life Support Systems for the 21st Century" (May 2013):

"By the time today's children reach middle age, it is extremely likely that Earth's life-support systems, critical for human prosperity and existence will be irretrievably damaged by the magnitude, global extent, and combination of these human-caused environmental stressors, unless we take concrete, immediate actions to ensure a sustainable, high-quality future."

We commend Caltrans for their extensive effort and CTP 2040's overall narrative of setting context (chapter 1), defining principles and strategies (chapter 6), modeling a solution that can meet the goals (chapter 7), and articulating next steps toward that solution (chapter 8).

However, CTP 2040 should be reshaped towards beginning now – not five or ten years from now – on "concrete, immediate actions" to tackle the issues of Climate Change. The following are specific comments on report content, arranged by chapter.

Chapter 1, Purpose and Context.

Goal number 6, "Practice Environmental Stewardship" should be supplemented with a reference to EO B-16-2012, where "It is further ordered that California target for 2050 a reduction of greenhouse gas emissions from the transportation sector equaling 80 percent less than 1990 levels." CTP 2040 should put California onto a path that will meet the Executive Order.

"Purpose of the Plan" should be supplemented with a statement that achieving the 2050 EO target is a key purpose.

The statement on page 3 that CTP 2040 shifts the state transportation system “from a focus on infrastructure, capital improvements, and delivery, to a more sustainable focus that supports economic prosperity in concert with GHG emission reductions” is welcome.

The note on page 4 that the shift will “require a fundamental, holistic transformation of the transportation systems” appears to be correct, and is another reason to begin serious work now.

The four strategies listed on page 4 – reduce vehicle miles traveled; efficient management; elimination of nearly all emissive vehicles from California’s roads; and technology improvements – are sound.

Returning to the Planning Framework (page 9), there is a statement that CTP 2040 only “addresses connectivity and/or travel between regions” and leaves Metropolitan Planning Organizations and Regional Transportation Planning Agencies to be solely responsible for transportation planning activities in their areas, which encompass most of the population of the state. CTP 2040 will not be able to achieve the four strategies listed on page 4 if it is only concerned with “connectivity and/or travel between regions.”

Further support for this broad view is contained on page 2:

“The CTP 2040 is a policy framework designed to guide transportation-related decisions for the betterment of **all** who live, work, and conduct business in California. Its aim is to help ensure that policy decisions and investments made at **all** levels of government and within the private sector will work congruently to enhance the State’s economy, improve social equity, support local communities, and protect the environment.” (emphasis added)

This section should add Governor Brown’s 2015 inaugural address goal to “within the next 15 years ... [r]educe today’s petroleum use in cars and trucks by up to 50 percent”, which is also embodied in the pending SB 350. The entire plan must focus on how that goal will be accomplished by this plan.

The Sierra Club Board adopted the similar goal of “50% reduction in oil consumption by 2030” last November. That leads us to three areas of solutions for cars and trucks:

- Healthy communities for less driving – compact and convenient, vibrant and verdant, with great transit, biking, and walking;
- Electric vehicles for other trips, powered by clean renewable electricity;
- Increased heavy truck mpg, electric local trucks and buses, and shifting freight and passengers to electric rail.

Chapter 3, Trends and Challenges.

Maintenance of the state’s existing transportation system is a key to a successful future. Page 3 (mentioned above) is clear that focusing on capital projects is no longer the right thing to do, but instead transportation authorities should respond to the mobility needs of the state’s “growing population and underserved groups...and address climate change. The aging physical system needs modernization, upkeep, and maintenance to meet expected demand increases.” (page 25)

There is further support in CTP 2040 for not building more highways and freeways. Chapter 6, The Plan, states that (to improve mobility) “the need to reduce GHG emissions make the case that adding automobile capacity is not the answer.”

Housing and Land Use (page 36) is a vexing issue. Housing unit growth is not keeping up with demand in transit priority areas, and rents and home prices are climbing. This makes it difficult to realize the GHG reduction goals of the Sustainable Communities Strategies within the state, as well as the oil reduction target. Incentivizing jurisdictions to meet their Regional Housing Needs Assessment targets to the CTP 2040 could be promising.

Goods Movement (freight mobility) is shown on page 29 to be a significant problem for California residents. Any plan to make improvements to what is a broken system should both reduce GHG and toxic emissions and be equitable to disadvantaged communities.

Chapter 5, Revenues and Expenditures.

Maintenance funding under the current financial regime is inadequate to the task. In fact, studies show that minor maintenance expenditures now can eliminate need for expensive rebuilding later. CTP 2040 must show that construction funding will be moved to SHOPP and other maintenance funding sources.

Chapter 6, The Plan.

G1: Improve Multimodal Mobility and Accessibility for All People

Transportation Demand Management (page 61) – Add pricing incentives, such as would result from “unbundling” parking pricing for jobs and multifamily residences vs. “free” parking, and working with localities to eliminate minimum parking requirements.

Transit and Active Transportation (page 62) – Plans for most new growth should be in infill compact livable communities that are well-served with transit, bicycling, and walking.

G5: Foster Livable and Healthy Communities and Promote Social Equity (page 74) – We strongly agree that “Solutions must support community aesthetics, the natural and built environment, and sustainable living.” How does the CTP influence these largely-local actions?

Chapter 7, Analysis and Outcomes.

Alternative 1 must be altered to remove unbuilt capacity expansion projects from MPO and RTPA long range transportation plans. Capacity expansion is clearly ruled out in Chapter 3.

Chapter 7 makes it clear that a lot of work needs to be done to put California on the EO B-16-2012 path to 2050. Unbuilt projects that add to the GHG problem should be stopped now and funds invested in new projects and programs that will help reduce GHGs and help improve “the betterment of all who live, work, and conduct business in California.”

In Table 17 (page 91), a missing option under Pricing – Road Pricing Strategy would be to consider pricing parking (“unbundling”) for workplaces and multifamily residences and removing off-street parking requirements. The table also references Bus Rapid Transit, but not the electric light rail / trams / streetcars that are growing in many cities in California, the U.S., and abroad.

Can Alternative 3 achieve the Governor's goal of 50% less oil by 2030?

Chapter 8: Recommendations and Next Steps.

We would highlight some especially vital recommendations:

Foster Livable/Healthy Communities and Social Equity

- Promote efficient infill housing development and redevelopment opportunities to reduce urban sprawl .
- Implement the Smart Mobility Framework principles statewide to integrate the transportation system and encourage non-motorized forms of transportation and Complete Streets.

Practice Environmental Stewardship

- Continue to promote policies that reduce air pollution such as the 2013 Zero Emission Action Plan, which directs the State to accelerate the market for zero-emission vehicles (ZEVs) in California. This also includes a goal of 1.5 million ZEVs in California by the year 2025.
- Support electrification of passenger rail, mode shift from planes and autos to high speed rail, and investments in renewable energy sources for transportation.

Active Transpor[t]ation System *[typo]*

Manage Transportation Demand

Thank you for your consideration of these comments.

Sincerely,



Kathryn Phillips
Director