



Public Notice of the 45-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, March 2, 2015 and ends Friday, April 17, 2015, 5:00 PM PST.

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) 653-4570
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.

First Name: Shirley

Last Name: Medina

Title: Planning and Programming Director

Organization: Riverside County Transportation Commission

Address: 4080 Lemon St, 3rd Floor

City: Riverside, CA Zip Code: 92502



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Contact Information, cont'd.

Telephone Number: 951-787-7141

Email address: Smedina@rtc.org

45 Day Review Comment Form Plan Comment

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

Chapter: _____ Page: _____

Comment: See attached letter.



Riverside County Transportation Commission

April 16, 2015

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

Subject: Draft California Transportation Plan 2040

Dear Mr. Corley:

The Riverside County Transportation Commission (RCTC) appreciates the public workshops held by Caltrans staff throughout the state and particularly in the city of Riverside. The workshop provided an overview of the goals of the document and other related roles and functions of Caltrans. We also thank you for the opportunity to review and comment on the Draft California Transportation Plan (CTP) 2040. The CTP 2040 is required by SB 391 to show how the state will achieve statewide GHG emissions reduction that meet the goals of AB 32 and Executive order S-3-05, which requires a more stringent standard of 80 percent GHG emissions reductions below 1990 levels by 2050. This effort is the first of its kind and RCTC is committed to working with Caltrans on the development of the draft CTP 2040.

RCTC was created by state law in 1976 to oversee the funding and coordination of all public transportation services within Riverside County. RCTC is charged with setting policies, establishing priorities, and coordinating activities among the County's various transit operators, subregional agencies, and local jurisdictions. Measure A was originally approved by the County's electorate in 1988 imposing a half cent sales tax to fund specific transportation projects and programs including, but not limited, highways, regional arterials, transit, rail, and commuter assistance (vanpooling/carpooling). In addition to the administration of Measure A, RCTC is also responsible for allocating federal, state, and local funds for highway, transit, rail, non-motorized travel (bicycle and pedestrian), and other transportation activities.

Riverside County is a pioneer in sustainability. In the early 2000's, anticipating future growth, the County adopted one of the nation's largest Multi-Species and Habitat Conservation Plans (MSHCP) in the Western Riverside County and Coachella Valley subregions. These plans mitigate for all future highway capacity projects in Measure A and future development, with buy-in from state and federal resource agencies. The MSHCPs are an essential element of the 2009 Measure A extension that was approved by the voters in 2002, renewing the 1988 Measure through 2039. Also linked to Measure A is a Transportation Uniform Mitigation Fee (TUMF) to ensure that new development pays its fair share of the infrastructure needed to accommodate growth. The Riverside Transit Agency (RTA) was one of the first and largest bus fleets in the United States to convert to an all-Clean Natural Gas (CNG) fleet and is now in the process of fully replacing those buses with

2nd generation CNG vehicles. SunLine Transit Agency in the Coachella Valley has led the way in experimenting with hydrogen fuel cell buses.

Since the inception of Measure A, we have successfully partnered with Caltrans in delivering projects that improve the economy, mobility, and quality of life for Riverside County residents in a manner that provides transportation solutions that meet the communities' needs.

Riverside County is one of the fastest growing counties in the state of California. In the past few years, four cities have incorporated. There are various infrastructure needs and many cities throughout Riverside County have Disadvantaged Communities as identified in the state's CalEnviroScreen tool. Due to the infrastructure needs to accommodate current and future growth, we are concerned with some of the assumptions and recommendations presented in the Draft CTP 2040 plan.

VMT Reduction Strategies –

Road Pricing: The assumption of 75 percent increase in auto operating cost is too high and unrealistic. We suggest lowering this percentage to reflect realistic levels that other MPOs included in their respective adopted RTP/SCS.

Transit Service Improvements: Doubling transit services including speeds, free transfers, and reduced transfer wait times is an optimistic objective. However, San Francisco and Los Angeles are the only areas that might be in a position to achieve doubling of transit. Most of the urban areas outside of these larger metropolitan areas do not contain land use densities and services at this level. Achieving such densities face many obstacles beyond the jurisdiction and authority of transportation agencies, and MPOs, not to mention likely public opposition from the diverse parts of the state, including Riverside County, where agricultural, rural, and suburban lifestyles are highly valued and have historical and economic significance. Transit service improvements should be discussed further with transit operators, RTPAs, and local land use authorities so the assumptions reflect realistic goals and objectives.

High Speed Rail: Reducing HSR fares by 50 percent is an aggressive target and requires subsidizing fares at a very high level. Given the high costs associated with operating and maintaining the system the identification of a dedicated funding stream that does not impact existing fund sources should be described in the plan.

Bus Rapid Transit: The assumption that 20 percent of local bus routes would be converted to BRT is also unrealistic especially in a large and diverse county such as Riverside. Much of the bus routes in Riverside County serve extremely disadvantaged communities with transit-dependent populations that are in sparsely populated rural communities. It is important for the state to note that Riverside Transit Agency (RTA) has the second largest service area in the United States. For clarification: is the 20 percent goal a state

average, or MPO average? It would be extremely difficult to achieve at a regional level, and therefore, we would recommend the MPOs agree on a target that can be achievable.

HOV lanes:

The plan assumes completion of the HOV network would be achieved by converting mixed flow lanes to HOV, not by adding HOV lanes. As previously mentioned, Riverside County continues to be one of the fastest growing counties and the need for additional capacity for HOV and mixed flow lanes is crucial to achieve mobility and economic vitality. We request that the plan revise the language regarding HOV lanes by stating the HOV lanes will be implemented by either adding HOV lanes or converting existing mixed flow lanes.

The plan also states that HOV lanes will be added to the Interregional Transportation Strategic Plan so carpools travel on HOV lanes in a seamless manner between regions. The ITSP currently has gaps in the system, specifically in the urbanized areas. Based on this concept, there should not be gaps in the ITSP as interregional trips traverse through several regions and through urbanized areas, which does not change the nature of interregional trips.

Road Capacity
Enhancing
Strategies:

On page 90, it states "Road capacity enhancing strategies were rejected due to concerns these would ultimately increase VMT. In addition, transportation strategies were intended to be assessed on a statewide basis – and not just in specific regions." Capacity enhancements are critical in growing counties, urban, suburban, and rural areas. These capacity enhancements address gaps in the system, chokepoints, interregional connectivity, operational and safety issues. In addition, capacity enhancements have the ability to reduce VMT if the improvement reduces trip length. Capacity is also necessary for accommodating bus lanes and bike and pedestrian facilities to ensure public safety and efficient operations for multi-modal use. The economic vitality and quality of life of a region will also benefit from capacity enhancement projects that address heavily congested areas.

Population growth and the need for housing development to accommodate such growth is an ongoing statewide challenge. Counties such as Riverside are forced to accept much of that growth as a result of built-out conditions in urban Los Angeles and Orange Counties. Density in the urban core eventually has limitations, not the least of which is a lack of affordable housing, another chief policy goal of the state Legislature and Administration. Riverside County's economy has largely been driven by affordable housing for middle-class Californians who are priced out of the urban housing market that the state appears most interested in accommodating in terms of providing infrastructure. However, economic and demographic realities mean that roadway capacity is a prerequisite for labor to access employment in the urban core, in addition

to making way for the densification and natural growth of those areas that today are outside of the urban core. Therefore, the state should not dismiss the need for *any* roadway capacity.

Finally, as the plan indicates, vehicle technology improvements will result in ZEV or near ZEV vehicles that do not emit GHG. These ZEVs will still create congestion that will need to be mitigated. Given the Governor's ambitious new goals for the ZEV fleet, VMT will logically constitute a lesser environmental concern while the quality of life and economic productivity concerns of congestion will remain.

Below are other topics in the CTP 2040 plan that we would like to offer our input.

- Economic:** Page 71 indicates the support for a cost-effective transportation system that is supportive of a vibrant economy. One strategy listed is to develop and promote efforts to improve reliability and efficiently through optimization of existing street and freeway capacity. This assumes that existing streets and freeways are sufficient. In Riverside County, there are several areas that are in need of capacity enhancements to function at acceptable levels. We agree with optimizing existing roadways, however, there needs to be recognition there are numerous roadways that need to be improved to meet standards so the roadways function at acceptable levels.
- Freight:** Page 71 states "Seek creation of national, state, and regional dedicated funding programs for freight transportation." RCTC supports this policy/strategy. Riverside County is heavily impacted by freight/goods movement on its rail corridors and freeways as it is home to major logistic centers and intermodal facilities. However, later in the document (page 122) it states "Avoid funding projects that add road capacity and increased maintenance costs". As previously mentioned, road capacity enhancements are necessary to ensure a vibrant economy, quality of life, and safety. Statements should not be made that would prevent regions from implementing road improvements that address community needs.
- Land Use:** Land Use is a critical component to addressing the VMT strategies. Integrating land use and transportation planning should be emphasized in the plan. Several local jurisdictions in Riverside County have worked with SCAG on developing land use scenarios that reduce VMT and address climate change. This effort and many other similar efforts throughout the state are taking place and should be recognized as models for addressing VMT reduction at the local level ensuring community needs are integrated in this effort.
- Market Demand:** Many components and assumptions of the CTP 2040 plan are heavily reliant on market demand and public acceptance, such as ZEV/near ZEV, TOD, telecommuting, housing, and transit usage to name a few. The term "if we build it, they will come", doesn't

multi-modal system is the key to providing the public more options to travel. When and how the public shifts to other modes, housing preference, and commute options is solely based on assumptions. The plan should highlight the assumptions are based on estimates for the purpose of developing a policy framework on a statewide level and that the MPO RTP/SCS plans are the guiding documents for project investments.

Funding: We support the funding recommendations identified in the plan that bring in new revenues to fund transportation so that all modes can benefit from new revenues. However, the plan is based on certain funding assumptions (sales tax/RUC) being in place. The plan needs to emphasize that the assumptions would require legislative and policy actions, and without these actions many of the strategy recommendations will not be feasible.

RCTC supports the state's efforts to achieve a more sustainable transportation system and we would like to commend Caltrans in preparing the Draft CTP 2040. We look forward to working with you on this important document. If you have any further questions, please contact me or Shirley Medina at (951) 787-7141.

Sincerely,

A handwritten signature in black ink, appearing to read "Anne Mayer". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Anne Mayer
Executive Director