

**Transmitted Electronically**

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RE: Comments on the Draft California Transportation Plan 2040

Dear Mr. Corley:

Thank you for the opportunity to comment on the California Transportation Plan 2040 (CTP 2040). There are many elements of the draft plan that represent a step forward for mobility and transportation in California. The Department did well to design a collaborative and well-facilitated process that included an inclusive group of stakeholders. The feedback of the working group was largely incorporated into the scenario modeling process. This produced elements that contain good information. The plan also acknowledges the important role that different modes of transportation play in moving goods and people.

While we appreciate what the plan represents, there are several areas where the final draft can be improved.

**A. GENERAL POLICY COMMENTS**

**A-1. More Clearly Distinguish CTP 2040 from Regional Transportation Plans**

The regional agencies in California have developed transformative regional transportation plans (RTPs) that are multi-modal and provide benefits beyond the transportation system. While CTP 2040 is a closely related document insofar as it provides a vision for the future of the transportation system goals, it does not provide the same programmatic direction for transportation network.

The short description of the relationship between RTPs and CTP 2040 on Page 9 is not sufficient. This discussion should make the following points so that the public will understand why some things may be included in the CTP 2040 that are difficult to include in an RTP.

- A regional transportation plan is a fiscally constrained document, meaning that it cannot include more projects and programs than what could reasonably be expected from realistic revenue forecasts

- In non-attainment areas, RTPs (including all of its forecasts relating to revenue, population, job growth, and development), must be reviewed by the U.S Environmental Protection Agency for reasonableness, which assures consistency with air quality conformity requirements.
- In Metropolitan Planning Organization, the plans are further reviewed to determine whether they will achieve a greenhouse gas reduction target.
- All RTPs are subject to the California Environmental Quality Act.
- RTPs have a defined programmatic effect insofar as expenditures in transportation improvement programs (TIPs) and the annual overall work program (OWP) must be consistent with the RTP.

None of these constraints apply to the CTP 2040. None. The CTP 2040 is an aspirational document. As such, it may include very aggressive goals and assumptions that cannot be included in an RTP. As pointed out in the letter by the Riverside County Transportation Commission, the CTP 2040 plan includes aggressive assumptions that include road pricing, transit service, and bus rapid transit. Further analysis in the plan shows that the transportation sector will not achieve GHG reduction goals without applying the plan's most aggressive recommendations, including an assumption that nearly all cars and trucks will become zero emission vehicles.

Many of the aggressive CTP 2040 assumptions would not even be permissible in a RTP for two reasons. First, the regional agency would have to show the funding sources that could be used to implement the strategies. As the Funding Chapter helps document, it is unrealistic to that all of the strategies could be achieved in a fiscally constrained plan. Second, many of the assumptions (road pricing, transit, and electric vehicle) would be rejected in a conformity analysis. We would expect the US EPA would require the region to revise the forecasted result to something more certain to assure that appropriate policies were in place to protect air quality.

The CTP 2040 serves a parallel but very different purpose to the RTP. It is a visionary document that highlights what we can become as a state that need not be grounded in the rigors of reality. Such documents are important to developing policy. But given the relationship between the two documents and the potential for public confusion in their comparison, the CTP 2040 should take the time to describe this relationship more clearly. Our members would gladly assist in drafting this language to assure that the roles of the two documents are clear.

## **A-2. Partnership and Collaboration with Local and Regional Governments**

The CTP 2040 should clearly embrace existing partnerships with local and regional government. For example, the Air Resources Board specifically recognized local and regional governments in the Scoping Plan as "essential partners" in the achievement of the AB 32 goals. But CTP 2040 only recognizes these relationships inconsistently.

Here is an illustration. The CTP 2040 raises several issues that are not within the Department's direct authority. While it is appropriate for the plan to note these relationships, it should frame policies in a way that recognizes the agency's authority (state, regional, or local) that has primary responsibility. Take, for example, the recommendation in the first column on page 111 to "*promote efficient infill housing development and redevelopment opportunities to reduce urban sprawl.*" The policy itself is fine (although the choice of the word "redevelopment" is ironic), but that the recommendation does not acknowledge that the Department must partner with local government in order to achieve the goal. In so doing an opportunity to build partnership is lost.

Fortunately, we need not look far for an appropriate model. The policy immediately to the right of the above example, in the second column on page 111, recommends that the Department "*work with local and regional agencies to apply considerations of health, equity, and sustainability to transportation decision-making.*" This is a better statement of what is needed and will appropriately focus the Department's efforts to work with the appropriate lead agency.

Phrasing that respects the authority of other agencies should be applied consistently throughout the document. Accordingly, all the goals and policies should be reviewed to determine whether the overlapping partnerships that the Department has with fellow agencies and local and regional governments are identified. Having the direction at the outset to cooperate with appropriate partners should greatly improve the success for all involved.

### **A-3. Road Capacity May Be A Strategic Investment.**

As a member of the Advisory Committee, we were more than a little taken aback at the breadth of the recommendation on page 122 to "*avoid funding projects that add road capacity and increased maintenance costs.*" It may be fair to consider the impacts of increased capacity and maintenance costs of a project, but "avoid" goes much too far.

Many good projects that are consistent with the plan's goals will be capacity increasing: High Occupancy Toll (HOT) lane projects anticipate increasing capacity to fund the additional lane; freight projects may increase road capacity by addressing critical freight needs; bridge repair may increase road capacity if bike lanes and other "complete street" facilities are added; and autonomous vehicle investment may increase the capacity and maintenance costs of the current network by allowing more cars to drive on the same roadway more efficiently. Is the intention for the CTIP to limit capacity increasing projects in all these instances?

Road enhancing projects may induce some travel—but the goal should be to reduce GHG system-wide. As California continues to grow, there will be instances when other goals, such as safety and mobility, suggest that some capacity increasing projects should proceed. A better approach, which conflicts with the language above, can be found on page 59: which acknowledges that "*investments are needed for capacity enhancements, and to manage the system and demand efficiently, provide viable transportation choices, and increase connectivity among all modes.*" The language on Page 122 should be amended to reflect the intent on Page 59.

#### **A-4 Performance Metrics Will Need Support.**

The performance framework used for CTP 2040 recognizes the benefits associated with building upon the well-vetted set of performance measures drafted by SANDAG for the Strategic Growth Council. In particular, the inclusion of measures related to non-auto mode share, accessibility to destinations, and land use impacts are valuable metrics. A number of MPOs have used either these exact performance measures or closely related measures to evaluate the RTP/SCS. At the same time, several rural agencies lack the resources, data, and capacity to apply a robust performance system.

Given the different capacities and fiscal resources of individual agencies, the CTP 2040 should commit to funding at every level of performance measurement. The infrastructure of a performance metric system—including the collection and maintenance of data and the processing systems to make the data accessible and understandable—is costly. For example, on page 110 includes a policy to “improve data” without a mention of funding. However, the reference in relation to modeling on page 125 calls for “secure stable funding.” The CTP 2040 should include policies for properly resourced performance evaluation consistently throughout in the document.

#### **A-5 Several Trends are Not Sufficiently Considered in the CTP 2040**

The plan should consider including more emerging technologies and programs that support the plan’s goals for expanding multi-modal transportation. Some of the items to consider incorporating include:

- *Expansion of Shared Mobility Services.* The plan addresses car sharing but this should be expanded to support all forms of shared mobility (car sharing, bike sharing, real-time ridesharing, Transportation Network Companies, scooter share, shared neighborhood electric vehicles, and on-demand shuttle and jitney services). Given the recent market expansion of these strategies, including car-pooling features that allows trips to be combined, and the very real possibility that such services will become part of the fabric of the transportation system (if they are not already), their exclusion is a glaring omission. The CTP 2040 could include a short-range recommendation such as: “Create supportive policies and secure funding for the promotion of shared mobility.” Additionally, the plan touches on autonomous vehicles but should consider the opportunities for shared autonomous vehicles.
- *High-occupancy toll (HOT) lanes.* HOT lanes as a strategy for reducing greenhouse gas emissions does not appear to have been included in modeling the alternatives. HOT lanes should be considered a viable strategy.
- *Active Traffic and Demand Management (ATDM).* The CTP 2040 deals with TSM and TDM separately but should consider bringing these concepts together (ATDM). ATDM builds on Integrated Corridor Management to dynamically monitor, control, and influence travel demand, traffic demand, and traffic flow of key highway corridors.

ATDM facilitates the use of transportation alternatives through real time traveler information at the corridor level, dynamic ridesharing, dynamic pricing, etc.

- Unified Transportation Payment Account. A unified or universal transportation account combines all forms of public transportation payments including transit fares, municipal parking and toll collection into a single user-friendly system. By offering rewards based on frequent use, toll discounts and other incentives, the system can lead to a shift from driving alone to using public transit or ridesharing.
- Mobility Hubs. The plan references Transit Oriented Development but could expand on this to incorporate support for the Mobility Hub concept. Mobility hubs provide an integrated suite of transportation services, amenities, and urban design enhancements that bridge the distance between transit and an individual's origin or destination. Mobility hubs are places of connectivity, where different modes of travel come together seamlessly, and where there is a concentration of employment, housing, shopping, and/or recreation. Mobility hubs feature a range of coordinated transportation services including: bike share, car share, neighborhood electric vehicles, bike parking, dynamic parking management strategies, real-time traveler information, real-time ridesharing, demand-based shuttle or jitney services, bicycle and pedestrian improvements, way finding, urban design enhancements, and supporting systems like mobile applications, electric vehicle charging, smart intersections, and a universal payment system to make it easy to access a wide range of travel choices.
- Parking Management: The plan mentions parking but could expand on this to encourage parking policies and management strategies that support transit oriented development and alternative transportation choices.
- Autonomous Vehicles. The focus by the State on connected vehicles should be placed on following and supporting the U.S. Department of Transportation Connected Vehicle Model Deployment Programs to prepare for connected vehicle deployment applications, only because over the next several years there will be significant activity and new developments by the State and by the US DOT on connected vehicles. Thus, we suggest a strategy recommendation under Chapter 8 also be added to demonstrate/continued support for coordinated connected vehicle efforts and perhaps leave the long-term recommendation as is which focuses on actual deployment "exploration" activities.

## **B. FUNDING & FUNDING NEEDS FOR RTP IMPLEMENTATION**

B-1 at Pg. 9: Suggest expanding to reflect local funding sources that help accomplish regional planning activities (in addition to only state and federal).

B-2 at Pg. 26: Figure 1 should also add revenues to the graph to show the historical reduction in available revenues.

B-3 at Pg. 27: First paragraph – discussion should go into a bit more detail about how over time the state has passed several bond measures to fund transportation, but that these measures are one-time only; that there is a need for sustainable and predictable funding stream that keeps up with inflation, changes to driving behavior, and vehicle efficiencies. It also might help to quantify the deficit as a whole and/or for certain categories. For instance Caltrans' 2015 Mile Marker report shows that there is a \$19 billion 10-year unfunded need for bridge work.

B-4 at Pg. 48: Should update the proposed decreased level in state excise tax for FY 2016. May also note how the volatility of ups and downs is causing potential for disruption in the transportation planning and implementation process.

B-5 at Pg. 49: Second paragraph on bonding...not sure if this is supposed to be an example or one highlight. The state also uses TIFIA to fund transportation projects – maybe say state uses other funding mechanisms such as GARVEE or TIFIA.

B-6 at Pg. 50: Cap & Trade paragraph and table 15 – although true, should be updated as the call for projects for some of these programs are done for a 2-year timeframe.

B-7 at Pg. 52: The threshold to pass local sales tax measures is two thirds, not 65 percent.

B-8 at Pg. 52: Under Highways, there should be a more up to date expenditure period than 2001-2011.

B-9 at Pg 54. Under “Funding Challenges: Decreasing Revenue” (page 54), there is some discussion on declining revenue due to better fuel efficiency and economic downturns. Additional points to add include: (1) price-based excise tax (former sales tax on gasoline) fluctuates with price, and with no floor, can (and has) cause significant swings in revenue; and (2) a stable revenue source is necessary to keep awarded projects under construction and planned projects on track for delivery.

B-10 at Pg. 55. The “Strategies to Reduce the Funding Gap” section focuses mainly on existing use and sales taxes. There should be a discussion on other potential sources of revenue, such as goods movement fees, container fees, and tolling.

B-11 at Pg. 108: Investing in public awareness for safety is good strategy, but often there are no funds for those activities – funding has been specific to capital projects and not for outreach or operations. We did not read in the above funding chapter anything about including those as eligible activities.

B- 12 at Pg. 113: The short-term recommendation seems more general when compared against the long term that is more specific. Creating a tax increment district would lead to disparity among jurisdictions, the state may want to advocate for consistent infrastructure conditions not varying differences like we have today in “self help” and non “self help” counties.

B-13 at Pg. 113: The recommendations under the Permanent Funding section could be enhanced. The report itself identifies a lack of indexation of fuel taxes as a cause of the lack of funds in today's environment, and yet, an indexation of fuel taxes is not included in the proposal. Likewise, the Road Usage Charge is discussed in the report, but no mention of it in the recommendation. Perhaps it is being included obliquely under the first bullet "Support efforts of a pricing strategy". If the state feels inhibited to be more specific about funding options, it should include all strategies, including indexation and mileage-based fees as options to be explored with policy makers leading to eventual adoption of one or more of them, not as recommendations to be implemented. Should VLF's and Speaker Atkins' idea be included in the report? Putting TIF as a strategy for long-term financing as a fund source is not adequate or reliable for future needs. The recommendations for this section should be strengthened to meaningfully address what the focus groups identified as one of the important challenges: the lack of funds.

B-14 at p.122, Invest Strategically. [SHOPP] funding levels are not sufficient to meet all maintenance and rehabilitation needs." Agreed, would be good to mention some alternative revenue source ideas in this section

### **C. OTHER TECHNICAL & IMPLEMENTATION RECOMMENDATIONS**

C-1 at Chapter 1: Purpose and Context: CTP 2040 Goals. The six goals do not align 100% with the five new Caltrans and CalSTA goals (developed in response to the SSTI findings, 2014). Should they be aligned? For example, CTP 2040's sixth goal is "Practice environmental *stewardship*" whereas the second Caltrans/CalSTA goal is "Stewardship and efficiency" (Responsibly manage California's transportation assets). The use of similar terms for different goals in these two documents can be confusing.

C-2 at Pg. 5, Table 5: Consider including some data for miles of transit service operated (perhaps separated by heavy rail, light rail, bus). Is there any bike information available at a statewide level, perhaps miles of Class I facilities?

C-3 at Pg. 11: Although the statement that "eventually, the (HSR) system will extend to Sacramento and San Diego" is consistent with the CHSRA's business plan, we'd like to see CTP 2040 address the Phase 2 HSR corridors. Phase 2 is only briefly mentioned in the CHSRA business and only focuses on the implementation of Phase 1 which will be complete in 2028. It is reasonable to assume Phase 2 could be built by 2040. We recommend that CTP 2040 include Phase 2 of the HSR system in Alternative 1 or at least in a minimum in Alternative 2.

C-4 at Pg. 15. We are the California Association of Councils of Governments, not the California Council of Governments.

C-5 at Pg. 19. Similarly as the Seaports are highlighted, there should be a section for Land Ports of Entry (POEs) naming all the commercial land POEs: San Ysidro (rail), Otay Mesa and Tecate (trucks), Calexico (rail), and Calexico East and Andrade (trucks). Additionally, please consider using the US Bureau of Transportation Statistics data for trucks/truckloads and/or trade value for these

C-6 at Pg.101: Under “Greenhouse Gas Emissions section,” the sentence reads, “AB32 requires that the 2020 total GHG inventory be the same as the 1990 GHG inventory, then 80 percent below the 1990 GHG inventory by 2050.” This needs to be clarified. AB 32 does not require the 80 percent below 1990 level by 2050. It is the Executive Order – EO S-3-05 that included the 80 percent below 1990 goal.

C-7 at Pg. 103 We read Alternative 1 in Figure 12 (Statewide GHG Emission Changes Relative to 2020) to show that greenhouse gas emissions will increase by approximately 11 percent between 2040 and 2050. Please help us understand to what we can attribute this increase (e.g. population growth).

C-8 at Pg. 30: Table 10: Freight Forecast and Trends – “Total shipments by weight (into, out of, and within CA) are projected to grow approx. 180% statewide between 2012 and 2040.” The SANDAG Freight Gateway Study Update utilizes the Freight Analysis Framework (FAF) Version 3.5 Tool. Considering the time period for the state of California, the total growth would be 55% according to FAF. This is most likely due to the fact that in FAF domestic inbound, outbound and internal is projected to grow near 1% per year; these moves by tonnage are highly substantial when compared to exports/imports. Lastly, “tonnage” is more appropriate rather than “weight.”

C-9 at Pg. 60: Traffic Management System: The title and reference throughout the text in this section seems to infer continued focus on "traffic," which seems to be in conflict with overall theme of this goal where focus should be multi-modal mobility.

C-10 at Pg. 60: A key point that could be referenced here, to assure consistency with regional plans or assure that this plan maintains its support for moving forward with G1 - is that improving multimodal mobility and accessibility is based on the foundation of multi-modal system performance and optimization for all modes. These can include multi-modal network efficiencies that cut across multi-jurisdictional operational improvements that do not require significant funding for major capital intensive infrastructure needs. TSM strategies are among the most cost effective strategies for achieving immediate mobility benefits but that will require the State to work in partnership with local and regional agencies.

C-11 at p 67. The Goal 2 discussion of *Preservation of the Multimodal Transportation System* mainly discusses road infrastructure. While the recommended strategies include a process for transit asset maintenance (Strategy P2-S4), public transit investments should be included in additional strategies, such as “include transit as a recipient of a “sustainable funding for maintenance and preservation”. (The example of the SHOPP program in P1-S3 reinforces the roadway focus of the goal).

C-12 at Pg. 61: “The concept of Integrated Corridor Management (ICM) is also in development to improve traffic flow from highways to surface streets. Together, these technologies should pave the way for widespread deployment of fully automated vehicles.” Would like to suggest that clarification or distinction should be made to express that ICM can be considered as a near to midterm recommendation strategy under Chapter 8 recommendations.

*C-13 at Pg. 120:* See generally, comments made under for ICM and Connected Vehicles under Chapter 6 page 61. Additionally, and this may seem more of an observation for internal discussion, overall it is not clear on how the recommendations laid out under this Chapter translate to actual funding commitments as they seem to denote general and guiding activities or efforts and not project/program level efforts. That said, even the specific recommendations need improvement:

*C-14 at p.120-121, Systemize Traffic Management:* The CTP 2040 only includes mid- and long-range TMS investments. TMS should also be a short term investment. Adaptive traffic signals listed under the “mid to long-range” timeframe are already being installed and should also be a short term strategy. Likewise for connected vehicle and vehicle platooning, in which exploration is already under way.

*C-15 at Pg. 124:* The “Reduce VMT” recommendations are worded in a way that unnecessarily limits their scope to certain strategies. Generally they should be broadened to allow more flexibility. Here are three suggestions: First, expand the recommendation so that it reads: “*create policies to incentivize employers to develop commuter benefit programs that encourage transportation alternatives. Encourage parking management strategies at the workplace, such as parking cash-out or priority parking for HOVs that discourage drive-alone commuting to work. Provide greater telecommuting options, and alternative work schedules designed to reduce the number of daily commute trips*” and add “*create policies that incentivize developers to provide TDM programs and services that mitigate the traffic impacts of developments.*” Second, consider expanding recommendation to “*secure additional funding to implement significant transit improvement strategies, including, but not limited to, increasing speeds, decreasing fares, increasing BRT, and improving transfer times*” to include improved access/connections to transit as well as improving the technologies (real-time traveler information, universal transportation account) that increase the convenience and competitiveness of public transit thereby creating more a positive attitude towards public transit for choice riders. Third, consider expanding recommendation to “*implement substantial public outreach to publicize the GHG benefit of eco-driving, car sharing and telecommuting*” to include transit and ridesharing.

#### **D. CONCLUSION**

Thank you once again for the inclusion of so many of our members in the CTP 2040 process and providing this further opportunity to comment. Please contact me if you have any questions or desire to follow up with any of our members that have expertise in the issues raised in this letter.

Best Regards,



Bill Higgins  
Executive Director