

April 16, 2015

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

Dear Mr. Corley:

The San Luis Obispo Council of Governments (SLOCOG) appreciates the opportunity to provide comments on the Draft California Transportation Plan 2040 (Draft CTP 2040) during the 45-day public review period.

As the MPO for the San Luis Obispo County area, SLOCOG's mission is to establish and maintain an effective transportation system, and enhance the high quality of life in San Luis Obispo County by providing resources and solutions and promoting collaborative intergovernmental relationships. The connection between the CTP 2040 and our Regional Transportation Plan (an update of which was recently adopted by our Board), as well as the other planning functions SLOCOG carries out in partnership with Caltrans, is a great example of such a collaborative intergovernmental relationship.

We commend Caltrans on creating a forward-thinking and fundamentally multimodal Draft 2040 CTP. The plan does not shy away from recognizing the substantial need for improving the maintenance and safety of our transportation system while providing options for Californians to get from point A to point B with a lower GHG footprint. With that said, we have identified a number of ways in which the draft can be strengthened. Our attached list of comments addresses big-picture policy themes and also offers a few editorial corrections.

This list represents SLOCOG's specific input. We are also signatory to a letter submitted by the US 101 Central Coast Coalition that provides additional input.

Thank you again for this opportunity to comment.

Sincerely,



Ronald L. DeCarli  
Executive Director



**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](mailto: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.

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Title: EXECUTIVE DIRECTOR

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**Public Notice of the 45-day Public Review Period of the California Transportation Plan (CTP 2040)**

**Contact Information, cont'd.**

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**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.

## Draft CTP 2040 comments – SLOCOG

### Policy comments

#### Chapter 3

1. P. 31: paragraph on connected/autonomous vehicles seems to be cut off.

#### Chapter 6

2. P. 59, G1, para. 1: We generally support and agree with this section and the sentence: “Additionally, investments are needed for capacity enhancements, and to manage the system & demand efficiency...” We believe the next sentence – “...make the case that adding automobile capacity is not the answer” – must be qualified. Interregional road capacity, such as widening Highway 46 between Paso Robles and Fresno; or widening Highway 101 between Santa Barbara and Ventura is justifiable for statewide travel mobility. Similarly, Caltrans defines interchange improvements as capacity increasing. Substandard and deficient interchanges must be acknowledged and recommended for improvement in the CTP. No matter how efficient the system becomes, there still will be a need to add capacity, especially in rural areas, and to support goods movement. Please modify this section with these types of examples.
3. P. 60, G1, Traffic Management System:
  - a. Add “auxiliary lanes and channelization (turn lanes) and managed shoulders” as TMS examples. Also add discussion on integrated park-and-ride lots as another TMS tool to enhance the efficiency of the system.
  - b. Add a statement regarding focusing investment on “operational improvements” as a component of the “Fix It First” policy.
4. P. 61, G1, Transportation Demand Management”
  - c. Add discussion of ridesharing programs and integrated park-and-ride lots as TDM strategies. Ridesharing is a cost-effective demand reduction strategy. Park-and-ride lots reduce SOV demand and increase efficiency. They are a key component in Caltrans tools and must be addressed in the CTP.
  - d. Pp. 61-62: Add integrated park-and-ride lots with freeway interchange bus stops as an example in this sentence: “This system must also be truly multi-modal with...”
  - e. Add discussion of new on-call shuttle services such as Uber and Lyft. These have the potential for significantly transforming local shuttle services. The VMT

reduction in Chapter 7 is woefully understated due to the exponential growth in this area. Please add a corresponding strategy to assist the growth of these concepts, such as reducing regulations, eliminating the need for commercial driver's licenses, etc.

5. P. 62: Active Transportation and Transit should get their own section headings
6. P. 62, Transit and Active Transportation, para. 1:
  - f. Under discussion, “transit services (often inefficient)” and under, “Many transportation agencies throughout the State recognize the inherent value in transit and are looking at improving transit”, add discussion of BRT and Express Bus Services.
  - g. Under Express Bus Services provide discussion on the concept of Freeway Interchange Express Bus Stops (with park-and-ride lots) to reduce transit stand time on major corridors and truly integrate transit into highways. Numerous examples include US-101 north of Golden Gate Bridge, Victoria, British Columbia. See attached images.
  - h. Address this again in paragraph #3 following: “transportation options work even better when combined with a comprehensive transit system”.
7. P. 64, Strategies:
  - i. P1-S2: Add ridesharing and park-and-ride lots
  - j. Add a new strategy for transit: “Integrate public transit into the state freeway system through transit signal overrides, HOV bypass on-ramps, and ramp meter override improvements; integration of bus stops in freeway interchanges; and BRT improvements in major travel corridors.
  - k. Add new strategy: Simplify the environmental and permitting process to more easily integrate bike, pedestrian, and transit improvements into maintenance projects.
  - l. Add new strategy: Develop updated Caltrans standards to retrofit state highways that serve as arterials and collectors in existing urban areas to serve as complete streets serving all modes of transportation.
8. P. 64: Strategies P1-S2 and P1-S3 reference parking policies. Add a new strategy: Review parking requirements in representative jurisdictions across the state, and prepare a report on potential parking pricing strategies, in order to discourage short auto trips, reduce congestion, support infill development, and encourage a “park once” philosophy in appropriate local contexts.

9. P. 64: P3-S8 wording – replace “interface with and complement a multimodal transportation system” with “connect to destinations and transit routes”
10. P. 65, G2, Preserve the Multimodal Transportation System: We take major exception with the 3<sup>rd</sup> paragraph, sentence [emphasis added]: “CalSTA recommends **regions and local governments** fully implement the ‘fix-it-first’ policy to preserve the **state highway system**”. Maintaining the state highway system is a state responsibility, not a responsibility to be shifted to regional agencies or local governments. We highly recommend you delete the last part and the sentence: “...to preserve the state highway system”. This would be consistent with the last sentence on p. 66 that states the need for a large increase in capital investments by all levels of government. We also recommend you modify the next sentence from: “the new focus is on system maintenance rather than expansion” to “the new focus is on system maintenance and operational improvements rather than expansion”.
11. P. 67, Strategies:
  - m. P1-S3: Add: “and local streets and roads” following “...SHOPP program)”.
  - n. P2-S6: Modify partnership discussion to: “Actively seek partnerships with regional and local agencies to leverage RTIP and-or local funding with SHOPP funding improvements”. Currently, the SHOPP is programmed independently. Caltrans could partner with local agencies to further enhance a SHOPP project with improvements desired by local or regional governments in a single integrated process.
  - o. Add new strategy for transit capital replacements: “Provide a competitive capital program for transit capital replacement, acquisition and the development and construction of transit centers and bus maintenance facilities”. Currently bus capital funding has been integrated into Sec. 5307 formula funding. This funding is insufficient in many smaller counties that may need high-cost maintenance facilities, transit centers, and bus replacements.
12. P. 73, G-4: Improve Public Safety and Security:
  - p. We believe this is a good broad perspective on the issue. We also agree with the draft “policies”. However, we believe the “strategies” are weak and need to be strengthened. Almost every strategy focuses on “improving outreach and education”. These strategies could be strengthened by calling out more detailed actions, such as a more robust inventory of accidents, prioritization, and the need for new dedicated funding stream to focus improvements in identifiable high priority problem areas.

13. P. 74, G5: “Foster Livable and Healthy Communities...”: We support the discussion, the Smart Mobility Framework, the recommended policies, and the strategies, and have integrated them into our RTP.

We also caution Caltrans and suggest this section clearly identify roles and responsibilities. Caltrans has little to no role in land use. The state can encourage, but the regions and locals implement. The state can best encourage these concepts by providing planning funds, such as funding the Regional Blueprints, funding for complete streets, and incentive funds for transportation projects linked to land uses that foster these concepts.

We recommend this section include another strategy to “Provide funding to local and regional agencies to plan and implement the concepts in this section”. State funding is necessary to supplement local funding and encourage these concepts while also providing the revenue to collect, analyze, and track the desired performance measures.

## **Chapter 7**

We appreciate and support the analysis, general alternatives and assessment.

We have a number of concerns over some of the assumptions used in the analysis.

14. P. 90, VMT Reduction Strategies: We cannot agree with a blanket rejection of road capacity enhancing strategies. This statement is inconsistent with many of Caltrans’ own Route Concept Reports that Caltrans implements. There are places throughout the state where road capacity is needed to close gaps, add linkages, and improve interchanges. This is critically important for interregional travel, goods movement, and access from rural areas. We believe this should be revised to state that it endorses selectively and strategically funding projects that add road capacity, including improving functionally obsolete interchanges, where such projects would serve broader goals.
15. P. 91, Table 17: Assuming a doubling of bike share by 2040 means only 3% of trips taken by bike in horizon year (current share 1.5%). We do not believe this is an ambitious enough objective. Our region’s bike mode share for commute trips alone, according to the Census, increased 62% from 2000 to 2013 (1.2% share to 2.1% share).
16. P. 92, Telecommuting: The assumption used in this analysis shows a mere 2.1% increase in work at home over the next 25 years. The Census shows this is the greatest change over the past decade. Nationally, working from home increased 35% from 1997 to 2010. In California, working from home increased from a 3.8% mode share in 2000 to a 5.2% mode share in 2013, a 37% increase. With increases in technology “work at home” will continue to increase significantly. Please reassess this assumption.
17. P. 92, Carpooling Strategy: This assumption is also incredibly low. Our US 101 Mobility Study indicated this is the most cost-effective strategy to implement. The CTP indicates

a mere increase of 5%. This assumption should also be reassessed for validity given the aggressive strategies added in Chapter 6, such as a state emphasis and financial support for ridesharing, 511, and park-and-ride lots. Please add more aggressive strategies as we recommended in Chapter 6 and reassess this percentage assumption.

18. P. 92, Carsharing Strategy: This strategy is similarly incredibly low, at a mere 5%. Uber has become a \$4 billion company in three years. The references used in this analysis are dated. Uber and Lyft were not yet operational or were in their infancy. Please use recent data and recalculate their potential VMT reduction. As noted in our comments, please add a more definitive discussion of these new technologies and how they are transforming transportation in Chapter 6, and reflect new projections in this chapter.
19. P. 93, Transit Service Improvements Strategy: The CTP notes that the aggressive growth in transit identified in the plan as potentially unrealistic. The CTP has not, however, identified what Caltrans can do to further enhance transit services. We advocate that the state should take a very strong role in areas they have direct responsibility. An example is duplicating the freeway transit and park-and-ride lot system that exists on US 101 north of the Golden Gate Park on a statewide basis. Currently any freeway express stops must go through a rigorous standard exception process with locals having to prove to Caltrans that they are safe versus Caltrans developing the standards and requiring such improvements where applicable to integrate transit into the freeway and expressway system. A state emphasis in this area would directly influence the CTP goal of increasing transit and the “speed of transit”.
20. Pp. 93; Chapter 8, pp. 115-116, 124: Expand language to include express bus stops on ramps and include in Chapters 7 and 8 where BRT is mentioned. Specifically:
  - a. Include express bus stop language under BRT strategy on p. 93 in Ch. 7
  - b. Include express bus stop language on p. 115 in Ch. 8 and p. 116 under Expand Transit Services and Operations
  - c. Include express bus stop language on p. 124 in Ch. 8 under Reduce VMT
21. P. 94, Expansion of Bicycle Use Strategy: As stated above, a doubling of bike share from 1.5% to 3.0% by 2040 is not necessarily aggressive. A key obstacle in the Fix-It-First strategy is any rehabilitation project requires bringing the road up to current standards. Due to the cost and the goal of reducing the centerline miles of distressed highways the emphasis will be maintenance overlays over rehabilitation, without the corresponding improvement of bike lanes. Addressing this conflict would allow the CTP to meet and likely exceed the goal of doubling the bicycle mode share.
22. P. 95 Operational Improvements: TSM: The plan assumes a nominal saving of 1%. It is largely based on the Caltrans System Management Strategy. With a more aggressive focus Caltrans should be able to increase the savings as noted in our recommendations

in Chapter 6. To recap, we suggest under the Fix-It-First the CTP should include a strategy to place a major emphasis on operational improvements to the current system, improving its efficiency and effectiveness. Examples would be auxiliary lanes, roundabouts, channelization, and freeway-managed shoulders (during peak congested hours). The latter example is one Caltrans District 5 is now assessing on US 101 in the Pismo Beach area to allow the use of enhanced median shoulders for mixed use traffic during peak hours.

23. P. 98, Table 20: Is CSTDM figure of 264 billion VMT accurate?
24. P. 99, Fig. 10: Typo, should be 2040 Alts 2 & 3 in rightmost bar
25. P. 100, Fig. 11: Same typo as previous
26. P. 102, Table 23: Alt. 3 % reduction target should be 80%, not 8%

## Chapter 8

Assure key strategies discussed in the prior sections are integrated into recommendations. They are currently inconsistent and not comprehensive. Suggestions include:

27. Page 109, Safety: Add a recommendation: “Seek funding to increase railroad crossing safety improvements and grade separations”. The nominal state funding currently available is insufficient to make a dent in railroad crossing accidents.
28. Pp. 109-110, Safety – Improve Public Safety and Security: Include a recommendation relating to how roadway and bike-ped facility design influences safety. Examples include improving obsolete or otherwise deficient designs on freeways and highways, implementing proven safety countermeasures, arterial traffic calming on state-maintained “main streets”, intersection safety, and addressing safety for vulnerable road users.
29. P. 111, Sustainability: Add a recommendation: “Modify Highway Design Standards to retrofit state highways that serve as collectors, arterials and Main Streets in urban areas to implement Complete Streets for all users and Main Streets in downtown areas.”
30. P. 112, Environmental, bullet #5: add ridesharing
31. P. 113, Economic Vibrancy:
  - q. First bullet: unclear intent.
  - r. Add a bullet: Support the modification of design standards to implement the Main Street Guidelines.
32. P. 113: Obtaining Permanent Funding:

- s. Funding is identified as one of the key constraints in this plan. The discussion in this section only nominally summarizes this. It should also be expanded to discuss local funding and transit system funding needs in addition to state highway needs.
  - t. Expand recommendations. The noted recommendations are sorely deficient. Please identify a mix of recommendations to push the legislature and the public into providing stable, dedicated funding source(s) for the operation, maintenance and improvement of all modes of transportation.
  - u. Move up the bullet for dedicated funding source for non-motorized from long-to short range.
33. P. 114, Climate Adaptation: Move up bullet under “mid- to long-range” to “short-range” as it applies to “Accelerate... Public transportation expansion, more bicycling and walking...” and add ridesharing. The CTP notes the importance of these mode expansions. Please emphasize this priority in the “short range”.
34. P. 115, Multi-Modal System Enhancement Recommendations:
- v. P. 115, Active Transportation Recommendations. This discussion pertains to multi-modal enhancements; modify and add an introductory section on Active Transportation.
  - w. The recommendations in this section must be reworked and focus on Active Transportation. They currently address both Active Transportation and Transit.
  - x. Add recommendations we noted on pp. 64, 94, and 111, re: complete streets, Main Streets, SHOPP maintenance vs rehab.
35. P. 116: Typo in heading
36. P. 116, Transit Recommendations:
- y. Add prior recommendations noted in our comments on pp. 61, 62, 67 and 93 pertaining to Express Bus system with freeway express stops linked to PnR lots, BRT, and transit capital needs. Focus recommendations on what Caltrans can do to expand transit and better integrate into the state system. Suggestions include: implement freeway express stops, transit capital replacement funding, HOV on-ramp priorities, and signal priorities. Work with Mass Transit staff to identify specific recommendations Caltrans can do to influence this mode shift.
37. P. 117, bullet #5: Add Freeway Express stops as a success story of better integrating transit into the freeway system as provided by Golden Gate Transit on Highway 101 in Marin County.

38. P. 117: Move up bullet #3, re: expanding funding for transit service from mid and long-range to short-range. This would be consistent with the aggressive transit mode shift recommended on P. 93.

39. P. 118, Multi-Modal recommendations:

- z. Add recommendations that we previously identified in our comments in Chapter 6. These include: adding a comprehensive system of park-and-ride lots; integrating public transit into the freeway system through freeway bus stops at interchanges linked with park-and-ride lots; modify highway design standards as noted above to retrofit existing highways in urban areas to implement “complete streets”; provide funding to enhance and Rideshare activities, vanpools, and better multimodal connections.
- aa. Accelerate almost all the recommendations from mid- and long-range to short. If the CTP is to be aggressive in reducing GHG these recommendations must be accelerated.
- bb. Modify Bullet #5, re, TDM, to: Provide funding and emphasize Transportation Demand Strategies such as ridesharing, vanpooling, park-and-ride lots, transportation information dissemination, and employer outreach programs.
- cc. Bullet #3 in mid-range, re: increasing efficiency and reliability of transit...: add freeway express stops, BRT-related improvements, and move up in priority from mid to short-range.
- dd. Bullets #3, 4, and 6: Move up in priority from mid to short-range.

40. P. 119, Sustainability in Rural Communities

- ee. Short range, add: Implement a system of park-and-ride lots to maximize efficiency of the system.
- ff. Integrate express bus stop concepts appropriate for rural areas, such as express runs, linking communities, expressway or freeway express bus stops, comprehensive bus stops, ridesharing services.
- gg. New bullet to: Emphasize comprehensive system improvements vs capacity enhancements as laid out in our US 101 Mobility Plan: demand reduction strategies, transit and vanpooling, extensions of local freeway frontage and parallel roads, operational improvements, channelization, roundabouts, etc.
- hh. New Bullet: provide funding to improve sight distance, add channelization, and provide wider shoulders on rural roads to enhance safety for both motorists and cyclists.



**Transit Stops  
On Ramps**

**Planned  
Relocation of  
SB Stop**

**San Diego, CA  
SR 15, PM 4.76  
@ El Cajon**



**Marin County, CA  
US 101, PM 5.69  
@ Tiburon Blvd (SR 131)**



**Sacramento, CA**  
**I-5, PM 19.27**  
**@ Seamas Ave / Fruitridge Rd**