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April 17, 2015

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

Re: **Draft California Transportation Plan 2040**

Dear Mr. Corley:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to review and comment on the draft California Transportation Plan (CTP) 2040 statewide transportation policy planning document. Since the inception of SB 391 (Chapter 585, Statutes of 2009) into law in 2010, the California Department of Transportation (Caltrans) has been charged with developing a CTP that identifies goals, policies, strategies, and performance measures that demonstrate how the statewide transportation system can reduce transportation sector greenhouse gas (GHG) emissions to 1990 levels by 2020, and 80 percent below 1990 levels by 2050. This is a difficult task, and OCTA commends Caltrans for producing the first draft CTP to take on this challenge.

OCTA is a transit operator and service provider charged by the public with providing transit services to disadvantaged and other communities in Orange County. In this role, OCTA is committed to meeting the CTP goal areas through aggressive multimodal plans, investments, and services. This is underscored by our fleet of over 500 clean-fuel buses serving more than 50 million passengers a year; over 450 vanpools serving more than 850,000 passengers a year, 650 miles of planned bikeways, a countywide network of over 2000 synchronized signals, and an ongoing investment in Metrolink commuter rail service.

OCTA also serves as the county transportation commission. In this role, the public has charged OCTA with stewardship of our local transportation sales tax measure. Future transportation sales tax measures, whether extensions or new measures, will rely on maintaining voter trust and commitments.

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Therefore, we respectfully request that the plan goals be broadened to include public support, public accountability and public transparency. These additional goals will greatly enhance the utility of the plan, and also tie to many of the strategies listed in the draft plan that acknowledge the need to renew or approve sales tax measures for local transportation purposes.

OCTA supports the proposed policies that would expand multimodal travel choices through strategic transportation investments that are included in Regional Transportation Plans/Sustainable Communities Strategies (RTP/SCS). The Southern California Association of Governments' 2012 RTP/SCS includes a number of aggressive strategies to reduce GHG compared to the previous RTP. These regional strategies are dependent on new funding and other innovative financing, and the draft CTP 2040 "Alternative 1" reflects these investments. The draft CTP 2040 also suggests additional strategies under "Alternative 2" that go beyond the financially-constrained RTP/SCSs. Although we recognize that the CTP must consider these kinds of strategies to meet the statutory requirements of SB 391, the CTP 2040 needs to clearly state that the feasibility of many of these additional strategies is dependent on increasing public support and new funding options.

While the draft CTP 2040 does recommend new funding options, the recommendations in Chapter 8 appear to disregard earlier discussions of collaborating with stakeholders to develop funding strategies that meet the needs of the transportation system. OCTA understands the need for stable and reliable revenue sources to benefit transportation performance and to maintain the infrastructure. However, as noted on page 71, identifying and ensuring the success of future revenue sources will require close collaborations with stakeholders, including the public, as well as regional and local agencies. Additionally, the draft CTP 2040 does not demonstrate the extent to which the recommendations address funding and transportation needs. New funding proposals are successful when a direct nexus is determined to exist between the revenues and transportation benefits.

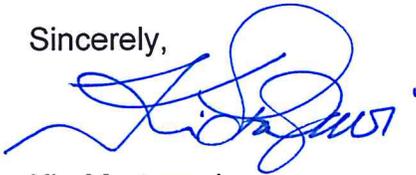
The effect on the statewide, regional, and local economies is also of concern to OCTA. The economic impacts of Alternative 1 and Alternative 2 are not clearly explained or depicted in the draft CTP 2040. Table 24 shows an increase in job creation in the short-term; however, it appears to show job losses through the mid- and long-term. It may help to clarify how the forecasts compare by adding a chart illustrating the gross economic impacts of each alternative. Additionally, the narrative explanation should be expanded to more clearly describe the economic impacts of each alternative and how the results compare between the alternatives.

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Finally, please clearly state that the role of the CTP is as a policy-level document. We recommend that any specific strategies in Alternative 1 or 2, and any future projects, be identified through the RTP/SCS process, which includes programmatic environmental evaluations and input directly from local agencies. This will ensure that planned implementation of strategies and projects are tailored to local needs and conditions. Additionally, the environmental evaluation will address issues that could impact air quality; biological and cultural resources; climate change; land use and open space; population, employment and housing; transportation systems; and other important resources. Each RTP/SCS also includes robust public outreach that engages the broadest and most diverse audiences possible in the regional planning process to ensure public disclosure, support, and accountability.

Again, thank you for the opportunity to comment on the draft CTP 2040.

Sincerely,



Kia Mortazavi  
Executive Director, Planning

KM:kb