

**CTC Staff Comments on the March 2015 Draft CTP**

CTC staff would appreciate a meeting with Caltrans staff to review and discuss once Caltrans CTP staff has had an opportunity to review comments received on the draft CTP, and determine “next steps” on the final development of the document

**General Comments**

- The CTP should be able to connect how the other various Caltrans modal planning efforts (such as the CA Freight Mobility Plan) relate to the overall CTP effort once this plan is adopted. This information should be presented in a clear and concise format for the reader to understand.
- The recommendations in Chapter 8 are so broad it is hard to tell what Caltrans is exactly planning to implement and when.
- We are not sure how the CTC could use the CTP when adopting programs in the future and setting investment priorities. We are also not sure how Caltrans and others will use this as their subsidiary plans and investment priorities are developed
- Federal regulations section 23 CFR Part 450.214 outlines the requirements for the development and content of a long-range statewide transportation plan. FHWA has stated in the past California must prepare a statewide plan in order for Caltrans to continue to receive State Planning and Research Funds. There appears to be no mention of the requirements of 23 CFR Part 450.214 referenced in the CTP; in addition some of these federal requirement seem to not be addressed within the document.

**SB 391 (2009) Requirements**

- Caltrans must complete the CTP by Dec. 31, 2015, and updated every five years thereafter.
- The CTP is required to include the following:
  1. Policy Element – describes the state’s transportation policies and system performance objectives.
  2. A Strategies Element – Incorporate the broad concepts from RTPs.
  3. A Recommendations Element – includes forecasts and recommendations.

Does the CTP meet these Element requirements?

- Does CTP staff feel that RTPs were sufficiently integrated in the CTP?
- The CTP is to address how the state will achieve maximum feasible emission reductions in order to attain a statewide reduction of GHG emissions to 1990 levels by 2020. The CTP does not clearly state what actions would have to take place to meet this goal.
- The CTP should consider the following subject areas for the movement of people and freight:
  1. Mobility and accessibility
  2. Integration and connectivity
  3. Efficient system management and operation
  4. Existing system preservation

5. Safety and security
6. Economic development
7. Environmental protection

Does the CTP address all these items?

- SB 486 (2014) specified that starting with the 2020 update of the CTP, the CTC may prepare guidelines for the preparation of this document.

#### Chapter 1

- Table 2, Page 8 – The table should be updated to reflect the completion of California Freight Mobility Plan.
- Page 13, The discussion on the ARB’s “Sustainable Freight Transport Initiative” should also include a reference to Caltrans’ recently completed Freight Mobility Plan”. Plus a reference should be made how these two respective state agency freight planning efforts will complement one another.
- Page 13, Should a reference to Caltrans’ Asset Management Plan be included in this section?
- Page 15, Table 4 reference to the “California Transportation Commission” on the listing of the PAC groups and agencies should be changed to “California Transportation Commission Staff”.

#### Chapter 3, Pages 25 to 27

- The description of transportation funding should also include a discussion that funding will be negatively impacted as more zero emission vehicles enter California’s fleet. Transportation funding is being heavily impacted as a result of more fuel efficient vehicles and this trend will continue as more zero emission vehicles are purchased.
- This section does not discuss current efforts underway in the development of a road charge pilot program. SB 1077 (2014) requires the CTC and CalSTA to create a Road Charge Technical Advisory Committee. The purpose of this committee is to guide in the development and evaluation of a road charge pilot program as an alternative for mileage-based revenue collection as an alternative to the per gallon gas tax.
- The 1<sup>st</sup> column on page 27 discusses Prop 1B and the wisdom of utilizing bonds to pay for transportation projects. We would suggest that Caltrans CTP staff seek direction from Caltrans management on the opinion regarding bond funds. Although it’s a correct statement, upper management and the Administration may not want to make such a statement.
- We would also suggest this section discuss the majority (approximately 50%) of all transportation funds are from local sales tax measures. As these locally financed transportation projects are constructed, Caltrans does not receive any additional funds to maintain this additional infrastructure.
- The last sentence in the first column on page 31 is incomplete.

#### Chapter 5

- Page 55 – The “Pay-As-You-Go Taxes and Fees” section gave the following overview of AB 2032: *“California’s Legislature has begun to take the initiative to address this issue with the passage of AB 2032 (2004), which, for a fee, permits single-occupancy vehicles in selected areas to use designated high-occupancy vehicle lanes (carpool lanes) during peak commute periods.”* The bill allowed several regional transportation agencies to utilize HOT lanes and requiring the net toll revenue generated by each program after payment of direct expenses to be allocated to the

construction of high-occupancy vehicle facilities and the improvement of transit services. The HOT lane program under this legislation allowed each agency to operate the HOT lanes for a period not to exceed 4 years after the agency first collects revenues for any of the authorized corridors, and would required a report to the Legislature by each sponsoring agency within 3 years. We would suggest that follow-up of those reports would be worthwhile to see if revenue generated from this pilot program met expectations.

- Page 56 – The brief explanation on SB 1077 is not correct in that it states the DMV is responsible to develop a road charge pilot program by July 2015. In fact, CalSTA was directed to implement a pilot program by January 2017. We would also suggest a more thorough description of SB 1077 be included as well.
- Page 45 – Although the breakdown is still approximately the same, DOF has a document titled: “Overview of Transportation Funding” dated February 23, 2015 that should be used to reflect updated information.
- Page 47 – The second column on this page states California’s excise taxes generates approximately \$6 billion. The next paragraph says in FY 14-15, the State excise tax will generate \$2 billion. These two statements seem to conflict.
- Page 53 – Under the Local Assistance Program, Caltrans oversees an annual \$1.7 billion program, not \$1 billion as stated in the draft.
- Page 53 – Under the Intercity Rail heading, the first sentence should read: “Caltrans manages two of the three state-supported intercity routes collectively known as Amtrak California.
- Page 56 - dated information and this plan should be careful in this regard Page 59 - statement that adding auto capacity is not an answer appears definitive and is not realistic when looking out to 2040 if we have a growing population and economy. Statement could be framed as a laudable goal I suppose Page 60 - box: statements are not factual Page 62 - second paragraph - word "predominately"

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## Chapter 6

- The chapter outlines the policies, strategies and performance measures for each of the six goals that are discussed within the chapter. Given a key hurdle in developing new performance measures (PM’s) is a lack of data, have these PM’s been vetted with the appropriate subject matter experts at Caltrans to ensure the PM’s are achievable?
- Chapter 6, Page 60 – A box on this page highlights “California’s Mileage Based Pricing Strategy.” We suggest this box be moved to Goal #2 – “Preserve the Multimodal Transportation System.” The reason being a discussion on the Road Charge Pilot Program is more appropriate in Goal #2 since this goal is more funding related. The primary intent of a road charge is to generate a more equitable/sustainable funding source, not as a measure to reduce VMT.
- Page 60, box on “California’s Mileage Based Pricing Strategy” – Suggest this be re-titled to: “California’s Road Charge Pricing Strategy”.
- Page 87, “The Tools” – In addition to summarizing the four models, this section should also discuss the limitations of those tools.

## Chapter 7

- This chapter discusses the CTP alternatives. It is very difficult to understand and determine what would be the impacts if any of these alternatives were implemented. The information is not presented in a way the general public (or most professional transportation planners) would understand.
- The language in SB 391 stated the CTP shall identify the statewide integrated transportation system needed in order to achieve the GHG emission reduction goals specified in AB 32 (2006). The chapter outlines three very high-level alternatives. The three alternatives are:
  - 1) Alternative #1 - Planned MPOs RTPs/SCSs and State Modal Plans
  - 2) Alternative #2 - Planned and Proposed Strategies (MPOs RTPs/SCSs and State Modal Plans plus the 15 CTP transportation strategies
  - 3) Alternative #3 – Includes Alternatives #1 & #2, plus future vehicle and fuel technologies
- According to the AAA, the average cost to operate an automobile is 59.2 cents per mile, or \$8,876 per year, based upon 15,000 miles of annual driving. CTP Alternative #2 assumes a 75% increase in automobile operating costs in order to reduce VMT. If these operating costs were increased by 75%, it would cost approximately \$1.05 per mile and \$15,533 annually. Would this be acceptable to the voting public? Is Caltrans suggesting state government institute a 75% increase? What would this do to the low income drivers?
- The CTP VMT reduction strategies assumed transit service levels would double, transit speeds for all services doubled, and transit rider fees would be free. Are these realistic assumptions? How would the State fund a 100% transit subsidy?
- The CTP attempts to address the impacts to low income if private vehicle operational costs increased 73 or 75%. However no mention was made to the impacts to rural or other areas where transit is not a reliable option.
- It was difficult to ascertain if the any of the three alternatives could actually achieved AB 32 GHG reduction goals. We suggest the three alternatives be described in a more understandable way. Plus, it was very difficult to determine if AB 32 goals could be achieved. Lastly, a better description of what changes should have to take place in order to achieve AB 32 goals. For example, according to the U.S. Bureau of Transportation Statics, 73.4% of Californians drive along for their work trips. How much would this percentage have to be reduced to achieve AB 32 goals? This type of information needs to be presented in a format that is understandable to the general public.
- What is the estimated cost to implement the 15 VMT reduction strategies in Alternative #2? What would be the impact to the state's economy?
- Both Alternatives #2 and #3 show an overall reduction in VMT. Do both of these alternatives take into consideration population growth? Would it be better to express this reduction in terms of a per capita VMT reduction?
- Many of the tables in Chapter 7 state GHG emission reduction in terms of “MMT CO<sub>2</sub>e/yr” or million metric tons of carbon dioxide equivalent per year. Will most non-technical readers know what a million metric ton of CO<sub>2</sub> looks like? How many cars does it take to produce a MMT of CO<sub>2</sub>?

- Page 105, Table 24 – This table indicates an overall reduction in GDP, jobs and wages in the outer years of the CTP with Alternatives #1 and #2. Will this be acceptable to our elected officials and the general public?

## Chapter 8

### General Comments:

- There are a total of 172 individual recommendations contained within the 20 general categories within Chapter 8. We suggest Caltrans review these 172 recommendations to determine if this number could somehow be paired down to make this very important chapter of the CTP more understandable to the reader.
- We would also suggest Caltrans give some thought as to what the level of expectation is regarding these recommendations. As currently written, the 172 recommendations are so general they may not be of value to either regional agencies or Caltrans regarding future policy direction. And specifically, will the CTP recommendations be able to be utilized by Caltrans during the preparation of other plans and programs?
- We suggest the recommendations be divided into two sections: one directed to agencies outside of Caltrans providing suggestions on addressing the 20 general category areas; and another section directed specifically to recommendations that should be adopted by Caltrans.
- We suggest Caltrans review the recommendations listed to ensure the timeframe (either short-range [within next 2 years], mid-range [3-5 years], or long-range [5-10 years]) is reasonable. Unreasonable expectations regarding the implementation of the recommendations could diminish the usefulness of those recommendations.

### Comments on Specific Items within Chapter 8:

- Safety Recommendations, Pages 108 to 110 – The collection and distribution of transportation related safety data is important. However given the complexity of the subject, it is reasonable to assume the recommendations identified will not be able to be achieved with the two-year timeframe as listed.
- Safety Recommendations, Pages 108 to 110 – There are no long-range safety recommendations identified. Some new vehicle technological improvements such as automatic braking, are starting to enter the market now, however it will take 5 to 10 years (or more) to see any measurable numbers of vehicles in the overall fleet, and to determine the impacts of this technology. Autonomous vehicles and their respective impact on the transportation system are expected to be 10 years or more before being available for market.
- Practice Environmental Stewardship, Pages 111 to 112 – This category does not contain any long-range recommendations as well. It is reasonable to assume Caltrans and other transportation agencies will still be addressing environmental stewardship issues 5 to 10 years from now.
- Practice Environmental Stewardship, Pages 111 to 112 – We would suggest CTP staff review the considerable work that other Caltrans staff have already spent on the new Caltrans goals, specifically goal #3 – “Sustainability, Livability and Economy”. Some of the new strategies within this goal are applicable to this particular CTP recommendation category.
- Practice Environmental Stewardship, Pages 111 to 112 – We would suggest CTP staff also include continuing efforts to increase the numbers of zero emission vehicles in the California

fleet. A recommendation on Caltrans targets for a cleaner Caltrans vehicle fleet would also be a good recommendation.

- Obtaining Permanent Funding, Pages 113 to 114, We suggest all of the recommendations within this category be reviewed for their relevancy. Transportation funding reform is a key element necessary to address our transportation infrastructure needs; a well thought through list of recommendations would help provide some direction on this item. An important item missing from this category is a reference to a road charge.
- Address Climate Adaptation and Resiliency of Infrastructures to Ensure Reliable Transportation, Page 114 – The description for this category explains that sea level rise is a significant climate change risk. We would suggest that other climate change related impacts be included as well such as intense storm activity (causing flooding and washouts), more forest fires and higher temperatures.
- Address Climate Adaptation and Resiliency of Infrastructures to Ensure Reliable Transportation, Page 114 – One of the recommendations states the following: “Require climate change resiliency in SHOPP and STIP programs and projects.” Given there is currently insufficient funds to pay for existing maintenance needs, what would be the impact if Caltrans and MPOs/RTPAs were required to include climate change?
- Address Climate Adaptation and Resiliency of Infrastructures to Ensure Reliable Transportation, Page 114 – Another recommendation states: “Avoid planning, developing, or building in places where structures will require significant protection from sea level rise, storm surges, or coastal erosion during the expected life of the structure.” Is this recommendation beyond the scope of the CTP? Should this statement be more focused on the development or on-going maintenance of transportation infrastructure?
- Address Climate Adaptation and Resiliency of Infrastructures to Ensure Reliable Transportation, Page 114 – Given the immense scope of addressing transportation related climate change issues, there must be more mid to long range recommendation regarding climate change adaptation. The only mid to long range recommendation is a GHG mitigation strategy, not an adaptation strategy.
- Address Climate Adaptation and Resiliency of Infrastructures to Ensure Reliable Transportation, Page 114 – One of the recommendations within this category should state the need for uniform climate change assumptions for federal, state and local agencies. It is difficult to conduct proper climate change planning activities if just within state government different agencies are using different assumptions such as the level of sea level rise, or intensity of storm activity.
- Active Transportation System (Bicycling and Walking), Page 115 to 116 – Although this category is supposed to address bike and ped issues, six of the recommendations are specifically targeted to transit. We would recommend these be moved to the “Expand Transit Services and Operations” category.