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Mr. Gabriel Corley
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Dear Mr. Corley:

SUBJECT: Draft California Transportation Plan 2040

The San Diego Association of Governments (SANDAG) appreciates the opportunity to comment on the Draft California Transportation Plan 2040 (CTP 2040). SANDAG appreciates the time and effort that staff from the California Department of Transportation (Caltrans) has taken to conduct outreach regarding CTP 2040.

SANDAG previously submitted comments on the Draft CTP 2040 in a letter dated April 17, 2015. While Caltrans staff has answered many of the comments raised in the previous letter, a few issues remain which are outlined below:

San Diego Forward: The Regional Plan

On October 9, 2015, SANDAG adopted San Diego Forward: The Regional Plan, which serves as the region's combined long-range transportation and comprehensive planning document. SANDAG suggests revising references to this Sustainable Communities Strategy (SCS) throughout the CTP 2040 to reflect its adoption date. For example, in Table 4, the horizon year should be revised to read "January 2016," and SANDAG's "Status of SCS" should be revised to read "Adopted October 2015." The "MPO SCS GHG, 2020" and "MPO SCS GHG, 2035" columns should be amended to read "-15%" and "-21%," respectively.

Preface

The first full paragraph on page 6 includes the following statement:

"In 2008, the Legislature passed and Governor Schwarzenegger signed into law Senate Bill (SB) 375, legislation that required regions throughout California to improve their long-term Regional Transportation Plans (RTPs) to reflect...reduced vehicle miles traveled (VMT)."

While VMT reductions are undoubtedly one way in which regions can achieve greenhouse gas (GHG) reductions in their RTP/SCSs, it is inaccurate to state that the law requires reductions in vehicle miles traveled (VMT); no such requirement appears in SB 375. SANDAG suggests revising this statement (and any other statements in the CTP 2040) to reflect the actual text and requirements of SB 375. For example, the legislation refers to achieving GHG reductions from “changed land use patterns and improved transportation.” See SB 375 legislative findings in Section 1(c).

Greenhouse Gas Reduction Targets

SANDAG suggests editing the following sentence on page 14 to read as follows:

“With the recent passage of State legislation and Governor’s executive orders, California launched an innovative and proactive approach to addressing climate change and GHG emissions. Thus, the CTP 2040 ~~is the requirement of addressing~~ how the State will achieve maximum feasible emission reductions in order to attain a statewide reduction of GHG emissions to 1990 levels by 2020, and 80 percent below 1990 levels by 2050.”

The CTP 2040 is referring to Executive Order S-3-05 (EO S-3-05) goals, established under Governor Schwarzenegger, which states that by 2020, California should reduce its GHG emissions to 1990 levels, and by 2050, its GHG emissions should be reduced to 80 percent below 1990 levels.

Page 15 states that “modeling of the transportation scenarios was a theoretical exercise designed to test on specific path to reach AB 32 reduction targets.” Assembly Bill 32 (AB 32) requires a set target for the year 2020, whereas the CTP 2040 analyzes GHG emissions for the years 2020, 2040, and 2050. AB 32 does set a statewide GHG emissions limit for 2020 equal to 1990 levels, but the law does not establish statewide GHG emissions targets for any other year. The goal of reducing statewide GHG emission to 80 percent below 1990 levels by 2050 was set by EO-S-3-05. SANDAG suggests revising this statement (and any other statements in the CTP 2040) to reflect the actual text and requirements of AB 32 and to avoid any implication that the law requires targets beyond 2020.

Growth in Cleaner Vehicles

A reference on page 59 states that there are 1,900 electric vehicle charging stations (EVCS) statewide. SANDAG suggests updating this number to reflect more current information. The Alternative Fuels Data Center (AFDC) currently shows over 3,000 public EVCS and over 500 private EVCS. Furthermore, SANDAG suggests incorporating a discussion of the lack of alternative fuel infrastructure to support the millions of vehicles the state anticipates to be on the road in the years 2020, 2030, and 2050.

Scenario 3

On pages 67 to 68, Scenario 3 states that a large increase in the number of Zero Emission Vehicles is required by 2050 in order to reach state GHG reduction goals. However, the document does not have much discussion on the electric vehicle infrastructure needed and does not reference the investments from the California Energy Commission (CEC) in this area.

SANDAG suggests referring to the following resources to make updates to Scenario 3:

- CEC Alternative Fuels Investment Plans
- National Renewable Energy Lab for the CEC's "California Statewide Plug-In Electric Vehicle Infrastructure Assessment"
- U.S. Department of Energy AFDC
- Information from utility charger programs at various utilities, including San Diego Gas & Electric, Pacific Gas & Electric, and Southern California Edison

Smart Growth

SANDAG appreciates the discussion on smart growth in Figure 21 on page 80. While highlighting the economic benefits of smart growth is important, SANDAG encourages incorporating information on the other benefits of smart growth throughout the draft CTP. SANDAG's "Designing for Smart Growth" is a good resource for how good design can contribute to the quality of life not only in the San Diego region, but throughout the state.

Highways and Roads

Page 93 includes the following sentence: "While new highway and road capacity will be built where it is the most cost-effective and policy-effective solution, most of the emphasis in the coming decades should be on (1) maintaining the existing highway and road system, and (2) maximizing the effectiveness of the existing capacity." SANDAG suggests incorporating language throughout the CTP 2040 that includes new managed, express, HOV, and carpool lanes that support public transit service and ridesharing as a part of the overall policy of creating a more efficient highway and road system that reduces greenhouse gas emissions. For example, the adopted RTP/SCS for the San Diego region relies on new managed, express, HOV, and carpool lanes in order to provide bus rapid transit service.

Shared Mobility

On page 95, under the discussion for Policy 1 Recommendations, consider adding the following shared mobility services to the third bullet: car-sharing, bike-sharing, real-time ride-sharing, shuttles/jitneys, and Transportation Network Companies (e.g., Uber, Lyft).

Alternative Fuel Infrastructure

SANDAG suggests integrating information on alternative fuel vehicles into the draft CTP in the following areas:

- Page 7 – A reference to the CEC's Alternative and Renewable Fuel and Vehicle Technology Program should be included in the "Other State Programs" table.
- Page 39 – Integrating alternative fuel vehicle and infrastructure information between the narratives on "State Highway System" and "Sustainable Freights and Ports" could show positive solutions, such as no/low tailpipe emissions, improved air quality, and GHG reductions. SANDAG's Refuel Readiness Plan and the CEC are good sources for this information.

- Page 53 – An additional paragraph could be added within the “Regional and Local Land Use Considerations” section regarding infrastructure needs, such as alternative fueling stations and EVCS.

Thank you for the opportunity to comment on the Draft CTP 2040. If you have any questions or comments, please contact me at (619) 699-6945 or via e-mail at muggs.stoll@sandag.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Stoll", written in a cursive style.

CHARLES “MUGGS” STOLL
Director of Land Use and Transportation Planning

MST/KHE/asa