



**Kern Council
of Governments**

March 29, 2016

Gabriel Corley
CTP 2040 Project Manager Division of Planning, MS-32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001

Electronic Submission: www.californiatrainingplan2040.org

Dear Mr. Corley:

Kern Council of Governments (COG) appreciates the opportunity to review and comment on the California Transportation Plan 2040 (CTP 2040). Kern COG is the Regional Transportation Planning Agency and the Metropolitan Planning Organization for Kern County which coordinates with the eleven incorporated cities and the County of Kern to optimize the existing and future transportation systems.

A. GENERAL POLICY COMMENTS

1. More Clearly Distinguish CTP 2040 from Regional Transportation Plans (RTPs)

Regional Transportation Planning Agencies in California have developed aggressive RTPs that are multi-modal and provide benefits beyond the transportation system. While CTP 2040 is a closely related document in that it provides a vision for the future of the transportation system goals, it does not provide the same programmatic direction for the transportation network.

The description of the relationship between RTPs and CTP 2040 on Page 9 is insufficient. The discussion should make the following points so that the public and regional stakeholders understand why some things may be included in the CTP 2040 that would not be permissible in an RTP:

- a. A Regional Transportation Plan is a fiscally constrained document, meaning that it cannot include more projects and programs than could reasonably be expected from realistic revenue forecasts.
- b. 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.
- c. In Metropolitan Planning Organizations, the plans are further reviewed to determine whether they will achieve a greenhouse gas reduction target.
- d. All RTPs are subject to the California Environmental Quality Act.

- e. RTPs have a defined programmatic effect in that the 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. 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.

The CTP 2040 serves a parallel but very different purpose than the RTP. It is a visionary document that highlights what may be done if everything were perfect, but it is not grounded in the rigors of reality and fiscal constraint. Due to the distinct potential for public confusion in comparing the CTP 2040 to a region's RTP, more time should be taken to describe the relationship more clearly.

2. Maintain State Partnership Commitments

Restore funding for the Focus Route Development Strategy of past California Transportation Plans. This funding was critical to develop multi-regional partnerships that provided for critical safety improvements in rural areas.

3. Maximize the Economic Benefit of Transportation Investment for Californians First

Priority should be placed on goods movement infrastructure facilities that reduce the cost to export California products out of state and overseas. Efficient, cheaper transport for California products, lowers retail costs, increases demand, and reduces trade deficits, while providing manufacturing and processing jobs for California residents. These types of projects have a much higher cost-effectiveness rating than simply providing infrastructure for out-of-state Class I railroad companies to push shipping containers through the state. Also, efficiency gains substantially reduce greenhouse gas emissions.

Kern COG appreciates that the CTP 2040 recognizes the importance of enhancing freight mobility, reliability and global competitiveness and the associated recommendations (Policy 2). Kern COG also appreciates that the CTP 2040 recognizes that sustainable and flexible funding to maintain and improve the system is critical to the success of the system (Policy 3).

4. Expand Road User Charge Pilot Program to Trucking

Eighty percent of the wear and tear on the state highway system is from heavy duty trucks. Truck tolling using a mileage/weight based system can both improve revenue while providing an incentive to reduce wear and tear. This concept was presented to Congress in 2013 <http://www2.itif.org/2013-oct-house-testimony-atkinson.pdf>.

B. OTHER TECHNICAL RECOMMENDATIONS

1. Page 43, first paragraph states: "If the State can encourage vibrant and intensive station area development and regional planning (e.g., SCSs) that channels the increased development into infill rather than sprawl, substantially greater VMT and GHG savings could result."

Comment: Please note that the current Draft High-Speed Rail Business Plan 2016 describes its initial operating system (IOS) will begin in metro-San Jose and terminate approximately 17 miles northwest of Bakersfield in a rural, pistachio orchard. Even if an interim station is built, the road access is insufficient to accommodate 1,000 high-speed rail passengers alighting every hour for the first scheduled service. Additionally, the 1,000 alighting passengers per hour will require a fleet of electric buses to move the passengers to their final destinations. This planning does not align with Kern County's SCS and creates unnecessary sprawl in rural Kern County.

2. Page 95, first bullet state: "Increase the supply of green transportation services to meet the needs of future population in a manner that reduces GHG emissions, such as EVs and charging infrastructure, clean fuels and fueling infrastructures."

Comment: For public transit agencies throughout the State to accomplish this practice, need to have CalSTA and Caltrans procurement methods updated to offer the procurement of such vehicles through the existing funding programs (i.e., FTA Section 5310, 5311, and 5311f capital programs).

3. Page 98, third paragraph, last sentence state: "Simply put, California needs a dedicated funding source that can keep up with preservation needs."

Comment: State gasoline excise tax has remained at 1997 levels and has not been adjusted for inflation. Without increasing existing funding streams to modern level of need, this statement is useless.

C. CONCLUSION

Thank you once again for providing this opportunity to comment on the Final Review Draft of the California Transportation Plan 2040. Please contact me if you have any questions or concerns.

Sincerely,



Ahron Hakimi
Executive Director