



March 29, 2016

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

SUBJECT: Comments on the Final California Transportation Plan 2040

Dear Mr. Corley:

Thank you for the opportunity to review the Final CTP 2040. The following comments are offered for your consideration:

- The CTP2040 too strongly limits its discussion of highways and roadways to "maintaining the existing highway and roadway system" and maximizing the efficiency and effectiveness of the existing capacity". While we agree that maintaining the existing roadway network while maximizing the efficiency and effectiveness of the existing capacity are important goals as we move forward in time, the heavy focus on existing roadways and highways limits CTPs focus when solving the age old question "How do we reliably move people and goods to their destinations?" which is critical in the AMBAG region and throughout California. Investments in roads serve electric vehicles, automated vehicles, transit vehicles, and trucks moving goods and help to ensure fundamental life needs are met (for example travel to education and medical services).

Additionally, in the AMBAG region, roadway investments are needed to support freight and economic activities, particularly along and connecting to the U.S. 101 corridor. The CTP2040 needs to more strongly identify the need for flexibility for the regions in prioritizing projects.

- The CTP2040 under-emphasizes the role partnerships and collaboration with local and regional governments play in the development of the future transportation system.
- The CTP2040 should more clearly distinguish CTP2040 from Regional Transportation Plans. The CTP2040 document should better incorporate the established regional transportation planning process that is fiscally constrained, CEQA reviewed, and involves a much more cohesive public participation process. This discussion should be included so the public understands why some things may be included in the CTP2040 but that are difficult to include in an RTP-MTP/SCS.
- The CTP2040 goals, policies, and recommendations developed based on a discretionary proportional share GHG emissions reduction policy. CTP2040 identifies a GHG reduction

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goal of 40% reduction from the transportation sector. This should be consistent with ARB's Scoping Plan which identifies a 29.5% GHG reduction target from the transportation sector. CTP2040 should explain the policy basis for this decision as well as the implications/tradeoffs of this policy decision. This is a difference between CTP2040 and RTP/SCS. RTP/SCSs were built to be consistent with the AB 32 Scoping Plan's 29.5% reduction.

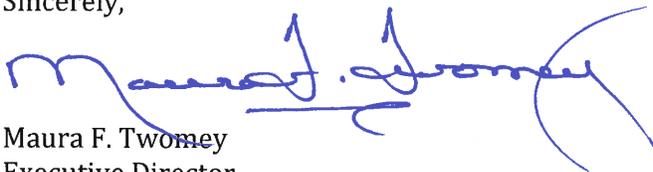
- The Final CTP2040 contains a number of performance metrics relating to all various goals and strategies, however, all of the analysis and results in the document are focused on GHG and VMT. Since the CTP2040 is primarily a transportation plan, it should include a balance of all the performance metrics particularly the mobility and access goals. A very small and limited discussion of non-GHG/non-VMT performance measures is included in Appendix 3. This is not enough. A discussion and analysis of the mobility and access performance measure results should be included in the Chapter 3 and Table 18 in the main document.

Additionally, the short-range/ongoing recommendation in Appendix 8 under the *Advanced Modeling and Data* section (p.23) should be modified to include "Secure stable funding for statewide, regional and local data collection, model development, documentation and data visualization activities support policy making activities."

- The CTP2040 should acknowledge that adequate funding resources are needed to implement the regions' Sustainable Communities Strategies. The CTP2040 should include strategies that provide adequate funding resources to implement the regional plans. For example, in Appendix 8, a short-range recommendation should be added under the *Foster Livable/Healthy Communities and Social Equity* section (p. 5) to "Identify new funding sources to implement the Sustainable Communities Strategies."

Thank you for the opportunity to review and comment on the Final CTP2040. If you have any questions, please contact Heather Adamson of my staff at (831) 264-5086.

Sincerely,



Maura F. Twomey
Executive Director