

**Transmitted Electronically**

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RE: Final Review Draft California Transportation Plan 2040

Dear Mr. Corley:

Thank you for the opportunity to comment on the California Transportation Plan 2040 (CTP2040). There are many elements of the final draft plan that represent forward progress for mobility and transportation in California. The Department has continued to use a well-facilitated process that includes an inclusive stakeholder group. As a result, CTP2040 acknowledges the important role different modes of transportation play in moving goods and people.

While we appreciate the progress the plan has made to incorporate a multi-modal transportation vision, there are several areas where the final draft can be improved.

**A. General Policy Comments**

**A-1. More Clearly Distinguish CTP2040 from Regional Transportation Plans**

A clear distinction should be made between the CTP2040 and Regional Transportation Plans/Sustainable Community Strategies (RTP/SCS). The CTP2040 takes a step in the right direction to distinguish the CTP2040 from Regional Transportation Plans/Sustainable Community Strategies on page 28. But it does not go far enough because the draft does not sufficiently describe those differences. Our April 17, 2015 letter commented "*while CTP2040 is a closely related document, insofar as it provides a vision for the future of the transportation system goals, it does not provide the same programmatic direction for the transportation network*". CTP2040, as a financially unconstrained vision plan, should more clearly distinguish CTP2040 from Regional Transportation Plans/Sustainable Community Strategies, as financially constrained investment plans.

A regional transportation plan is a fiscally constrained document; meaning that it cannot include more projects than can be expected from a realistic revenue forecast. In non-attainment areas, RTPs (including all of its forecasts relating to revenue, population, job growth, and development) must be reviewed by U.S. Environmental Protection Agency for reasonableness, ensuring consistency with air quality conformity requirements. In Metropolitan Planning Organization (MPO) regions, the plans are further reviewed to determine whether they will achieve greenhouse gas reductions targets. They are subject to the California Environmental Quality Act and have a defined programmatic effect as expenditures in transportation improvement programs (TIP) must be consistent with them.

CTP2040 describes itself as a policy framework designed to guide transportation related decisions for the betterment of all who live, work, and conduct business in California (CTP2040 page 18). CTP2040 page 8 further highlights the document as a framework for guiding principles for transportation decision makers at all levels of government and the private sector and emphasizes the importance of partnerships to develop and implement future transportation policies and programs. As a policy framework, the CTP2040 is aspirational in its goals, not fiscally constrained, and requires partnerships for its implementation.

To clearly distinguish CTP2040 from Regional Transportation Plans, we recommend adding a new chapter entitled “Partnerships For Success”. This chapter should:

1. Clearly distinguish the CTP2040 and the regional transportation plan.
2. Highlight the role regional and local agencies play in delivery of the transportation system. CTP2040 requires partnerships of state, regional, and local agencies in its implementation.
3. A matrix that identifies where partnerships to implement the CTP2040’s policy framework exist.
4. Identify strategies the state may employ to encourage stronger collaboration with regional and local agencies, particularly when the Department is not the lead decision making entity (see table).

<b>Policy</b>	<b>Requires Regional Partnership</b>	<b>Requires Local Partnerships</b>	<b>Existing Partnerships</b>	<b>Strategies for Enhanced Partnerships</b>
Goal 1, Policy 1 – Manage and Operate an Efficient Integrated System	Yes	Yes	Regional/Local	Partner/coordinate with local and regional agencies during the development of state, regional, and local plans.

**A-2. CTP2040 Under-Emphasizes the Role of Partnerships and Collaboration**

CTP2040 underemphasizes the role partnerships and collaboration with regional and local governments play in the development of the future transportation system. CTP2040 integrates RTP/SCSs and rural land use visions with statewide long range plans in order to meet the mobility, safety, sustainability, and economic objectives. Without collaborative partnerships with regional and local agencies, the CTP2040's Policy Framework will face significant implementation challenges. Each regional and local agency has a unique role in the delivery of the transportation system, which must be highlighted as necessary to the success of meeting CTP2040 goals.

CTP2040 would benefit from expanding the discussion of the role regional and local agencies play in the delivery of the transportation system. Strong partnerships between the state and these agencies will be required to meet the state's economic and greenhouse gas emissions reductions goals. With roughly 75 percent of all transportation funding generated from non-state (federal, regional, and local) revenue sources, the strong need for the state to partner with regional and local agencies is obvious.

**A-3. More Clearly Articulate Policy Choices**

Figure 12 indicates CTP2040 goals, policies, and recommendations are developed based on a discretionary GHG emissions reduction policy (proportional share). CTP2040 clearly articulates the law does not require a proportional share reduction from each sector.

Recognition of the CTP2040's GHG emissions reduction targets (2020, 2030, and 2050) as policy decisions is needed. A discussion describing the policy decision as well as the implications/tradeoffs of the policy should be incorporated within the plan. That policy decision has been used to inform the goals, policies, and recommendations in chapter 4.

CTP2040 should also clearly distinguish between CTP2040's aspirational statewide GHG performance goals for 2020, 2030, and 2050 (measured from a 1990 baseline for the entire transportation sector) and the legislatively enacted regional per capita targets created under SB 375. This is an important and fundamental difference between CTP2040 and the RTP/SCS.

**A-4. CTP2040 Too Strongly Limits Discussion of Highways and Roadways**

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*". We agree these are worthwhile goals. Unfortunately, this language indicates a subtle, but direct bias toward capacity enhancing projects without examining whether individual projects meet the goals of the plan. 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?" (CTP Pg. 38). CTP2040's language should be updated to articulate the goals, policies, and recommendations without bias toward specific strategies. This is consistent with the design of SB 375, which sets a goal, but allows broad discretion in achieving it.

## **B. Additional Technical Comments**

Please find below an additional list of technical comments to the document. Please note, this list does not include all technical comments, but rather a summary of the maintenance planning related comments. We anticipate additional comments will be submitted directly from our member agencies. We encourage you to work with them as you incorporate these as well as other comments received.

- B-1 Chapter 1, page 15: "Reduce long-run repair and maintenance costs by using "fix it first," smart asset management, and life-cycle costing, to maintain our transportation infrastructure in good condition...."
- a. This bullet should also mention the specific need for ongoing preventative maintenance—that needs to take place following a "fix."
  - b. This bullet should describe what is included in "infrastructure" (e.g., the growing need for IT infrastructure, including communications, software and hardware, operator interface modules, TMC equipment and not just the capital infrastructure in the field.) Life-cycle cost planning needs to take into account all aspects of infrastructure to ensure long-term health and sustainability of the transportation network.
- B-2 Chapter 1, page 20, Key state legislation and administration direction: Given the importance and frequent mention of the move towards risk-based transportation asset management plans, it would be useful to include reference to SB 486 and any corresponding administration direction in this section. (SB 486 is referenced later in Chapter 4, page 99, but should also be identified in Chapter 1.)
- B-3 Chapter 1, page 20, Key state legislation and administration direction: Given the growing importance of Transportation System Management and Operations (TSM&O), it would be useful to include any administration direction here (e.g., Draft Director's Policy #DP-08-R1).
- B-4 Chapter 2, p. 38: On pages 36-37, Figures 4-7 identify major capital transportation assets ((e.g., road miles, bridges, airports). However, on page 38, there is only a mention of ITS assets. Recommend adding additional figures that identify a) ITS assets (e.g., number of CMSs, ramp meters, detector stations, and CCTVs); b) TMC locations; c) communication assets (including ISDN, fiber optics) and d) IT infrastructure needed to support ITS assets and TMCs. Oftentimes, these "behind the scenes" needs are not fully identified. Budgeting for these critical items is often not fully estimated. These should be more prominently referenced, as are the capital assets.

- B-5 Chapter 4, page 89; 4<sup>th</sup> paragraph: This paragraph discusses “fix-it-first” activities and provides a brief overview of SHOPP.
- a. It would be useful to identify actual next steps for asset management, including the **planned development of an “Asset Management Performance Report”** for pavements, bridges, culverts, and ITS infrastructure. It would also be useful to indicate **how/when local agencies, including MPOs, can be involved in the process to identify prioritization criteria for asset management.**
- B-6 Chapter 4, pp. 90-91: Summary of steps taken to transform the CTP Vision into action: This section should also mention the need for ongoing maintenance after “fix-it-first.” Specifically, as described in the 2016 SHOPP (released 1-29-16), this section should mention Caltrans’ plans to increase the effectiveness of ITS contracts by addressing system maintenance (not just installation).
- B-7 Chapter 4, page 98, Goal 2, Policy 1, Recommendation 1: This bullet recommends exploring “alternatives to traditional transportation funding...” This is a great recommendation and should remain. However, as included in the March 2015 Draft CTP 2040, on page 68, Strategy 3 actually called out the SHOPP program (“Acquire sustainable funding for maintenance and preservation (e.g., the SHOPP program).” As discussed in Item 5a, there is a plan to align budget with the “fix-it-first” policy, especially anticipated for the 2018 SHOPP. Recommendation 1 in the 2016 CTP 2040 should continue to mention SHOPP, as it had in the March 2015 Draft CTP 2040
- B-8 Chapter 4, page 99, Goal 2, Policy 2, Recommendations: As discussed in Item 1b and 4, it is critical to include communication and all IT infrastructure costs (e.g., hardware, software, TMC equipment) as part of overall transportation infrastructure asset management and life-cycle costing.
- B-9 Chapter 4, Goal 4, Policy 1, Recommendations: Please add the following recommendations
- a. Research efforts to standardize and update the incident reporting software used by the California Highway Patrol. With greater consistency in reporting (e.g., standardized drop-down menu selections for certain incident parameters), agencies throughout the state could have access to consistent incident data. Right now, incident analyses rely on manual review; much of this could be automated with improved and standardized incident reporting. This could assist in corridor analyses and recommendations for improvements, based on reviews of incident data.
  - b. Convene regional incident management task forces, including multi-disciplinary teams (coroners, emergency responders, Caltrans, CHP) to share relevant information about relevant legislation, local transportation initiatives, tools available for shared use. (The Bay Area convenes quarterly meetings with over two dozen agencies.)

## C. Conclusion

Thank you for inclusion of so many of our members in the CTP2040 process and providing us further opportunity to comment. Please contact me should you have any questions or desire to follow up with any of our members that have expertise in the issues raised in this letter. In particular, we request you coordinate with our member agencies in the development of the recommendations contained in A-1 (development of the Partnerships for Success chapter).

Sincerely,



Tanisha Taylor  
California Association of Councils of Governments