



March 29, 2016

Gabriel Corley, CTP Project Manager
Division of Planning, MS-32
California Department of Transportation
1120 N Street
Sacramento, CA 94274-0001

Re: Comments on California Transportation Plan 2040 Final Review Draft

Transmitted Electronically: ctp2040@dot.ca.gov

Dear Mr. Corley:

The California Building Industry Association (CBIA) and the California Business Properties Association (CBPA) appreciate the opportunity to submit these comments on the California Department of Transportation *California Transportation Plan 2040 Final Review Draft*. CBIA is a statewide trade association representing thousands of member companies, including homebuilders, land developers, trade contractors, architects, engineers, designers, suppliers and other industry professionals. CBPA is the designated legislative advocate for the International Council of Shopping Centers (ICSC), NAIOP of California, the Commercial Real Estate Developers Association (NAIOP), the Building Owners and Managers Association of California (BOMA), the Retail Industry Leaders Association (RILA), the Institute of Real Estate Management (IREM), the Association of Commercial Real Estate – Northern and Southern California (ACRE), the National Association of Real Estate Investment Trusts (NAREIT), the California Downtown Association (CDA), and the California Association for Local Economic Development (CALED). CBPA currently represents over 10,000 members, making it the largest consortium of commercial real estate professionals in California.

The draft correctly points out that the CTP 2040 is required under State law (SB 391 - 2009) to analyze how California can achieve its various GhG emissions reduction targets in the transportation sector. Also, as noted, those emissions reductions have to come by way of “feasible” strategies. To attempt to address this, the draft poses three theoretical transportation scenarios focused broadly on strategies to achieve VMT and GHG reductions. While certainly well-intended, we believe many of the strategies are presented without clear (or in some cases *any*) evidence of their market-acceptance or feasibility – both of which are necessary to ensure basic, minimum standards of success.

The reason this is important is that, as noted in the document, “...while the modeling is a theoretical exercise, the recommendations are intended to transform the CTP’s Vision for a low carbon transportation system into actions.” Absent clear evidence of acceptance and feasibility, the goal of turning the strategies into “actions” to achieve the vision may never be realized.

Pricing Strategies & Transit

The manner in which the draft treats both travel costs and mode shifts illustrates our concerns.

By far one of the most effective strategies identified in the draft is to “implement expanded pricing policies.” The economic analysis section of the draft acknowledges that under the CTP 2040 there

will be an increase in vehicle operating costs that will have to be borne by motorists. What is less clear is *how much* those specific costs are and what those increases are likely to be.

(An earlier iteration envisioned a 73% increase in the cost of auto use over the projected 2040 baseline costs.) For purposes of clarity and transparency, the document should clearly describe the various pricing and vehicle fees and then be transparent about the anticipated cost increases to California motorists. A substantial (73%?) increase in the cost of auto use calls into question whether the strategy is feasible in light of the massive cost increases that could be visited on Californians --- particularly lower-income households. Rather than directly address this issue, the draft punts to a response strategy identified as "improved transit services."

Under this mode shift strategy, a number of assumptions about transit service, ridership and improvements are speculated in the draft. For example: Transit speeds will increase by 50%; transit headways will be doubled; transit fares will be reduced; High Speed Rail will be maximized; wholesale transit service improvements statewide will be realized. Again, the feasibility and acceptability of these assumptions must be called into question.

A recent article in the Los Angeles Times *Billions spent, but fewer people are using public transportation in Southern California* (See, <http://www.latimes.com/local/california/la-me-ridership-slump-20160127-story.html>) notes that despite significant increases in transit funding, ridership is in decline. According to the article, the Los Angeles County Metropolitan Transportation Authority, the region's largest carrier, lost more than 10% of its boardings from 2006 to 2015, a decline that appears to be accelerating. Despite a \$9-billion investment in new light rail and subway lines, Metro has fewer boardings than it did three decades ago when buses were the county's only transit option. Other agencies have fared no better. In Orange County, bus ridership plummeted 30% in the last seven years while some smaller operators across the region experienced declines approaching 25%. A Metro study found that 16 transit providers in Los Angeles County saw average quarterly declines of 4%- 5%.

Further north in the state, a 2015 study by the Metropolitan Transportation Commission found that per capita usage of transit in the 9-county Bay Area has dropped a whopping 14% since 1991. In the Sacramento region, Sacramento's RT system reports over a 9% slippage in ridership this past year and is proposing a 20% hike in fares or face major --- possibly debilitating --- operating losses.

The fact of these real world situations are clearly at odds with the rosy, vision analysis offered in the CTP draft. Questions are fairly raised of whether the improved transit mode strategy -- like the expanded pricing strategy -- is feasible and likely to be embraced in the marketplace.

Land Use

We acknowledge the effort, under SB 375, to integrate transportation planning with land use and housing policy. Our organizations have worked locally to ensure that the sustainable community strategy growth forecasts are carried out equitably and according to law as regional transportation plans are updated. That said language in the "call-out" box on page 69 under the heading *ROLE OF LAND USE* prompts a comment. In part it states "*Recent research has shown that transportation efficient land uses can reduce auto dependency and improve public health through more use of active transportation and safer streets. Caltrans recognizes that even more transportation efficient land uses can provide even greater reductions in GhG emissions beyond those modeled in the CTP 2040.*"

In a perfect world this would best be characterized as simply stating the obvious: *The more you give the more you get.* What this pleasantry fails to account for though is that we don't live in a perfect world and *more* of something is not always met with appreciation or acceptance.

Based upon a comprehensive analysis of all published court decisions from 1997 to 2012 in which a CEQA lawsuit was filed challenging the validity of a development project's environmental impact report , 59% of challenged projects involved what we and Caltrans and others might consider socially desirable, infill development projects. Additionally, more than a third of all projects challenged were public works projects – primarily transit and renewable energy projects. According to the Holland & Knight *In The Name Of The Environment* report, the most commonly-challenged type of project involved public infrastructure and mixed-use developments.

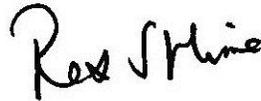
While land use certainly can and should play a role in moving the state towards its GhG reduction goals, such a Pollyannaish strategy is troubling, particularly in light of the clear, real world evidence to the contrary and when coupled with the recent Office of Planning & Research CEQA guideline proposal to reduce roadway capacity and encourage congestion and delay as a way to add additional considerations to the CEQA process in the name of reducing VMT.

Thank you for the opportunity to offer these comments.

Respectfully,



Richard Lyon
CBIA Senior Vice President



Rex Hime
CBPA President & CEO