

March 29, 2016

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

**Subject: California Transportation Plan 2040**

Dear Mr. Corley,

Thank you for the opportunity to provide comments on the California Transportation Plan 2040. This letter specifically responds to the California Transportation Plan 2040, Final Review Draft dated February 29, 2016 (hereafter referred to as "CTP 2040").

The mission of the San Diego Unified Port District (District) is to protect the Tidelands Trust resources by providing economic vitality and community benefit through a balanced approach to maritime industry, tourism, water and land recreation, environmental stewardship and public safety. The District was created with the San Diego Unified Port District Act (hereafter "Port Act") adopted by the California State Legislature in 1962 and as amended. The Port Act recognizes the Public Trust Doctrine, and states that tidelands and submerged lands are only to be used for statewide purposes. To this end, the District is charged with management of the tidelands and diverse waterfront uses along San Diego Bay that promote commerce, navigation, fisheries, and recreation on granted lands. When issuing discretionary permits and/or project approvals for projects and activities located within tidelands, the District often times serves as the lead agency under CEQA.

The District has strong interest in integrated planning, mobility, and sustainability. We find the goals of CTP 2040 are consistent with the District's long-term planning, mobility, and sustainability aspirations. Areas of common alignment include: 1) Increased access to multi-modal transportation opportunities; 2) Implementation of transit system improvements; and 3) Improved resiliency planning for transportation networks. The District has recently adopted a Climate Action Plan and we find the CTP 2040 parallels our efforts to reduce vehicle miles travelled and corresponding greenhouse gas emissions. The goals of CTP 2040 are also consistent with the District's long-term Integrated Planning Vision and Guiding Principles; specifically, the District's commitment to incorporate state of the art sustainability practices across the organization.

Pursuant to the Port Act (Port Act Section 87) and the Public Trust Doctrine, it is the District's duty and obligation to develop a balance of such uses. In addition, the California Coastal Act recognizes the unique role of ports and requires the District to continue to develop and modernize our resources and also maintain and improve those same vital resources for the entire State of California.

Like all ports, the District's land holdings include a wide range of land uses including maritime, commercial, industrial uses, and public recreation. While a portion of the District's land holdings are open space and/or conservation areas, the remaining lands are predominately urban in character. These urbanized areas represent a continuum of uses from high-density development to undeveloped parcels. The diversity in character requires an infrastructure, including a multi-modal mobility network to support these different uses.

We support the CTP 2040 Smart Mobility Framework ("SMF") and use of "context sensitive solutions" where the District can develop solutions that correspond directly to our unique needs (p. 107). We encourage implementation of policies recommendations, including:

**Goal #1: Improve Multimodal Mobility and Accessibility for All People**

*Policy #3: Provide viable and equitable multimodal choices, including active transportation*

- Support and implement projects and policies, including Complete Streets that increase biking and walking, especially short trips, first/last mile transit trips, and school trips.

**Goal #5: Foster Livable Communities**

*Policy #2 Integrate multimodal transportation and land use development*

- Work with local jurisdictions to apply SMF principles to optimize locational efficiencies in land use considerations;
- Ensure that transportation plans and project reflect strategies to efficiently connect people, goods, and services to housing, work, recreation, and other destinations while at the same time avoiding negative impacts to agricultural production areas and sensitive land and water resources (p. 108).

We are also highly supportive of CTP 2040's acknowledgement of freight, including several recommendations that seek to promote and prioritize this important component of the State's transportation system, as listed below (p. 103).

**Goal #3: Support a Vibrant Economy.**

*Policy 2: Enhance freight mobility, reliability and global competitiveness.*

- Prioritize investment on freight corridors to support the objectives of the CFMP.
- Complete the Sustainable Freight Action Plan with Go-Biz, CNRA, and CalEPA, per EO B-32-15, including development of pilot freight projects.
- Research, develop, demonstrate, and deploy cost-effective technologies and operational strategies to expedite goods movement, improve safety and reduce congestion.
- Improve the State's 12 deep-water ports with active freight rail connections to the National Rail System.

The District would like to highlight the importance of protecting and improving maritime assets as essential elements within the transportation network. These maritime assets are critical to job creation and stimulation of economic activity. The State, in collaboration with Ports and other stakeholders,

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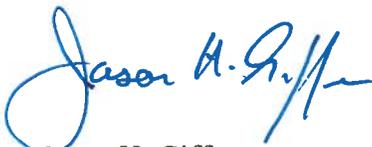
should be encouraged to identify and work toward improving key gateways and corridors, including “last mile” infrastructure.

The District acknowledges the uncertainty surrounding the impacts of climate change and the challenges they may create for transportation managers (i.e., Goal #2: Preserve the Multimodal Transportation System). We also agree more information is needed about how sea level rise, resulting from a changing climate, could substantially affect public access areas and recreation. As Caltrans and other agencies work to “ensure reliable transportation routes are available (including freight infrastructure impacts on harbors and ports) and provide a network in “good repair”, it is important to identify “a dedicated funding source that can keep up with preservation needs.” As the District prepares to adapt to a changing climate, we encourage Caltrans to “explore alternatives to traditional transportation funding” in an effort to protect and preserve our shared infrastructure (p. 98).

On December 4, 2015, President Obama signed into law the Fixing America's Surface Transportation Act, or "FAST Act" - the first Federal law in over ten years to provide long-term funding certainty for surface transportation. The District supports a statewide, collaborative effort to capture FAST Act funding to implement projects that support the CTP 2040 goals. We look forward to partnering with Caltrans as we collectively address this important issue.

Thank you for the opportunity to review and provide comments on Caltrans CTP 2040. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Jason H. Giffen". The signature is stylized with a large initial 'J' and a long horizontal stroke at the end.

Jason H. Giffen  
Assistant Vice President  
Planning and Green Port

LH/mh

cc: Randa Coniglio, CEO/President