

BOB ALVARADO, Chair  
DARIUS ASSEMI, Vice Chair  
YVONNE B. BURKE  
LUCETTA DUNN  
JAMES EARP  
JAMES C. GHIELMETTI  
CARL GUARDINO  
FRAN INMAN  
CHRISTINE KEHOE  
JAMES MADAFFER  
JOSEPH TAVAGLIONE

STATE OF CALIFORNIA

EDMUND G. BROWN Jr., Governor



SENATOR JIM BEALL, Ex Officio  
ASSEMBLY MEMBER JIM FRAZIER, Ex Officio

WILL KEMPTON, Executive Director

## CALIFORNIA TRANSPORTATION COMMISSION

1120 N STREET, MS-52  
SACRAMENTO, CA 95814  
P. O. BOX 942873  
SACRAMENTO, CA 94273-0001  
(916) 654-4245  
FAX (916) 653-2134  
<http://www.catc.ca.gov>

March 21, 2016

Mr. Malcolm Dougherty  
Director, California Department of Transportation  
1120 N Street  
Sacramento, CA 95814

Dear Director Dougherty,

The California Transportation Commission (Commission) considered the final draft of the California Transportation Plan 2040 (CTP) at its March 16 – 17, 2016 meeting. While we have been concerned about the delayed release of this document, the Commission commends the California Department of Transportation (Caltrans) and other stakeholders for their extensive efforts in responding to landmark legislation impacting how the state must plan for the future of transportation. The Commission appreciates that Caltrans addressed many of the comments we provided last June regarding the prior draft version of the CTP.

The CTP must plan for multimodal integration of the state's transportation system through 2040 while meeting many objectives, including greenhouse gas emissions (GHG) reduction and other environmental goals, promoting economic vitality, and improving mobility and accessibility for all Californians. The Commission recognizes the complexity and challenges of balancing environmental goals with economic and mobility needs, particularly in a state as large and diverse as California.

Pursuant to Senate Bill (SB) 486 (DeSaulnier, 2013), the Commission looks forward to working with Caltrans on the development of CTP Guidelines to promote conveyance of the full spectrum of State and Federal requirements for the CTP planning process and plan content. The Commission looks forward to adopting the CTP Guidelines to inform the next iteration of the CTP due in five years. The Commission acknowledges that there is limited ability to further amend this document given the short time frame to finalize the plan. With the exception of our

first comment regarding the clarity of the CTP recommendations, the majority of our input is primarily intended to inform the development of the CTP Guidelines.

### **Clarity of CTP Recommendations**

The Commission suggests that Caltrans review the policy recommendations in Chapter 4 to ensure they are understandable to a majority of the readers. Some examples of the unclear policy recommendations include:

Goal 2, Policy 1 (page 98) – *“Explore alternatives to traditional transportation funding to support maintenance of the existing system and operational improvements, and professional capacity to develop transformational projects that shift the existing transportation footprint and performance.”* An explanation of the meaning of “professional capacity” and “existing transportation footprint and performance” should be provided.

Goal 3, Policy 3 (page 103) – *“Support efforts to implement a road pricing strategy with consideration of accounting for equity impacts contingent upon capacity to simultaneously improve transit services.”* Clarification should be provided as to whether the recommendation is intended to support a road charge only if a designated portion of the funds is dedicated to transit.

### **State and Federal Requirements**

To promote a healthy economy, environmental stewardship, and quality of life, the plan must acknowledge and balance all statewide goals and objectives. As required by SB 391 (Liu, 2009), the CTP focuses on methods to reduce statewide transportation related GHG emissions. However, objectives related to ensuring mobility, connectivity, and economic development as required by California Government Code Sections 65071 et seq. and Federal regulation, i.e., 23 CFR Section 450.214 and 23 USC Section 135, are not as clearly articulated in the plan.

### **CTP Implementation**

To facilitate understanding of how the policy framework of the CTP is implemented, the “Guiding Transportation Policy” section of the Preface should discuss the unconstrained nature of the CTP, specify the statutory limitation prohibiting the inclusion of projects, and explain how the statewide plan interacts with Regional Transportation Plans/Sustainable Community Strategies (RTP/SCS). Additionally, while the modal plans are listed in Chapter 1, Chapter 2 should discuss how those modal plans could be applied in the context of the entire statewide transportation network. For example, the State Highway System section in Chapter 2 would benefit from discussion of the Interregional Transportation Strategic Plan (ITSP).

### **Economic Impacts**

The CTP 2040 is the first long-range, statewide planning document to consider the economic impacts of implementing the strategies outlined in the plan. The overview provided in Chapter 3 and detailed in Appendix 7 is helpful to identify the scope of the analysis and the modeling tools available. For the next iteration of the CTP, the Commission recommends that Caltrans continue to refine the economic modeling tools and data available and ensure that necessary strategies are incorporated to support robust economic growth through 2040 and beyond.

Mr. Malcolm Dougherty  
March 21, 2016

### **Technology and Innovation – Connected and Autonomous Vehicles**

Technology should be a key component of the transportation system vision for 2040. The discussion of innovative technology in the “Opportunities and Challenges” section of Chapter 2 is important given the recent efforts underway within State government to develop regulations for the operation of autonomous vehicles on public roadways. The deployment of connected vehicle to vehicle (V2V) and autonomous (AV) vehicles represents an important emerging area of transportation operations policy that should be highlighted in the CTP 2040 document and future iterations of the plan. Policy recommendations associated with the implementation of this new technology should be included in all applicable sections, and as data sources become available the GHG emissions reduction potential associated with the deployment of V2V and AV technology should be considered in future iterations of the plan. Additionally it would be helpful if the CTP aggregated regional information from RTP/SCS’s regarding the deployment of V2V and AV technology and infrastructure to illustrate the statewide implications and policy considerations.

The CTP 2040 references Governor Brown’s goal to reduce petroleum use by up to 50 percent by 2030 with targets for 1.5 million Zero Emission Vehicles (ZEVs) in California by 2025. The CTP 2040 states that California is poised to meet these goals with over 160,000 ZEVs on California’s roads today. However, without more aggressive action, the Commission is concerned that achieving the goal of 1.5 million ZEVs in California by 2025 will not be met. As a result, the CTP 2040 should also refer to the anticipated release of the Governor’s updated Zero Emission Action Plan and call for greater investment in visible, convenient electric vehicle charging facilities adjacent to state routes and other key strategic locations as an immediate measure to support this important environmental objective.

The Commission appreciates the opportunity to provide comments for consideration. If you have any questions please contact Garth Hopkins, Deputy Director, at (916) 653-3148.

Sincerely,



BOB ALVARADO  
Chair

c: Commissioners, California Transportation Commission  
Brian Kelly, Secretary, California State Transportation Agency  
Kome Ajise, Caltrans Chief Deputy Director