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Dear Mr. Corley:

As stated in the findings of SB 391 (Liu, 2009), “The state lacks a comprehensive, statewide, multimodal planning process that details the transportation system needed in the state to meet objectives of mobility and congestion management consistent with the state’s greenhouse gas emission limits and air pollution standards.” SB 391 requires the CTP 2040 to detail the California transportation system needed for consistency with our greenhouse gas emission limits and air pollution standards. The California Transportation Plan 2040 (CTP 2040) provides a great opportunity for the state to develop a plan better-aligned with current transportation priorities and policies, including Caltrans’ new mission statement, and chart a course to timely reach the statewide greenhouse gas emissions reduction goals for the transportation sector.

We appreciate the opportunity to comment on the draft CTP 2040. First, we want to commend Caltrans for their work thus far. We appreciate all of the significant progress that has been made in this multimodal planning process. The most recent CTP draft already demonstrates Caltrans’ commitment to transportation planning that better serves Californians, our environment, and our economy:

We support the overall direction and approach of the CTP 2040 with its focus on sustainability, climate, and mode shift.

The CTP 2040 reflects the state policy goals relating to climate mitigation and adaptation, reducing vehicle miles traveled (VMT), increasing accessibility, protecting natural and agricultural resources, and addressing social equity. In particular, we appreciate that the CTP 2040 focuses on strategies that reduce transportation greenhouse gas emissions (GHG) through all mode shift and reduced VMT strategies, not only through improved vehicle and fuel efficiency. As demonstrated by the analysis of the CTP 2040, the state must aggressively deploy all available strategies to reduce transportation GHGs.

The CTP 2040 includes some exemplary strategies and recommendations.

We are thrilled to see some specific recommendations informed by the CTP 2040 analysis. For example, we commend Caltrans for the recommendation under “Invest Strategically” to “[a]void funding projects that add road capacity and increased maintenance costs.” This recommendation is directly born out of the CTP 2040 Alternatives analysis and is specific enough to influence decision-making.



However, a number of actions are needed in order for the CTP 2040 to fulfill its promise. To improve the CTP 2040, we offer the following recommendations:

Recommendation #1: Revise all CTP 2040 Alternatives to be more specific, relevant and up-to-date

Recommendation #2: Strengthen the recommendations to promote social equity, shared use mobility, and SB 375

Recommendations #3: Help ensure that state transportation decisions will be aligned with the CTP 2040 with actionable recommendations, appropriate performance metrics, and a clear plan for tracking progress

Each of these recommendations is further explained below:

Recommendation #1: Revise all CTP 2040 Alternatives to be more specific, relevant and up-to-date

1a. Model specific actionable policies and programs that directly inform clear recommendations. The result of the CTP 2040 Alternatives analysis is clear: the state must transform the transportation system in order to meet the state's climate goals. However, the CTP 2040 Alternatives analysis models "Objectives" and some general "Policies," which are basically assumptions about a change in conditions (Table 17, draft CTP 2040). Because the Alternatives analysis models "Objectives" and general "Policies," rather than specific strategies that may be deployed, it is difficult to make specific recommendations based on the modeling that will ensure the state will meet its climate goals. For example, it may be a useful modeling exercise to assume a five percent increase in carpool vehicles, but it is even more valuable, to model specific policies, funding programs, and infrastructure that may achieve a five percent increase in carpool vehicles and provide clear policy recommendations to achieve that result. Simply assuming a change in outcome for modeling purposes leaves this process falling short of its intended potential and value.

1b. Integrate land use into the CTP 2040 Alternatives analysis. We understand that land use is controlled by local governments, not Caltrans. However, transportation and land use are inextricably related, and therefore any transportation model that does not incorporate land use will be sorely inaccurate. Caltrans should incorporate basic land use assumptions in the CTP 2040 to make the Alternatives analysis more accurate and relevant, and should plan to model land use projections for future California Transportation Plans.

1c. Update the Alternatives to include the latest Regional Transportation Plans / Sustainable Community Strategies. Alternative 1 purportedly demonstrates the GHG



reduction from existing state and regional plans. However, it does not include the latest Sustainable Community Strategies from the San Joaquin Valley, which represents roughly 11% of the state’s current population. Moreover, the Valley is the fastest growing region in the state, with the population expected to grow to more than 7.5 million residents by 2050. Travel in the San Joaquin Valley region is currently heavily automobile-oriented with few transit and active transportation options. By omitting this critical region of the state, the Alternatives are outdated and likely overstate the quantified GHG reductions. Therefore, the model should be updated to include the eight RTPs/SCSs from the San Joaquin Valley. In addition, one of the big critiques of the Valley SCSs is that they do not include interregional trips within the Valley. The CTP 2040 provides the unique opportunity to analyze interregional trips and recommend interregional VMT reduction strategies.

Recommendation #2: Strengthen the recommendations to promote social equity, shared use mobility, and SB 375 implementation.

2a. Strengthen social equity analysis and recommendations. We appreciate that the CTP 2040 includes a goal to promote social equity. However, we recommend that the CTP 2040 clearly define “equity.” For example, a robust and forward-looking definition of “equity” is: “Full and equal access to opportunities and amenities, regardless of race, ethnicity, gender, place, age or wealth.” In addition, in accordance with the CTP 2040 Goal 5 to promote social equity, the CTP 2040 should explicitly prioritize the transportation needs of disadvantaged communities, including better-connecting communities that lack safe and reliable transportation to jobs, affordable housing, amenities, and other health-promoting resources, setting a minimum target for future investment that is no less than the 25% standard currently in place for new funding programs (e.g.GGRF, ATP). Although equity is woven into various chapters, the current draft does not give equal emphasis and equal weight between environment, economy and equity, as the governing three E’s would presuppose. Other comments here address the need to strengthen the Environment chapter. The Economy chapter currently stands strong. A stand-alone Equity chapter is needed to give full weight to both the importance and role of Equity in solving California’s current transportation challenges and making the most of our current opportunities. In addition, the CTP 2040 needs to:

- **Strengthen analysis and mitigation of impacts on low-income and disadvantaged communities.** We recommend that the CTP 2040 improve its equity analysis by including discussion of travel costs by household income groups, statewide and by region. Further analysis of travel costs by trip purpose, which the California State Transportation Demand model makes possible, can lead to recommendations for best serving low-income residents. In addition, we expect that the new Regional Transportation Plan guidelines will include health criteria recommendations, as directed by AB 441 (Monning, 2011.) The state should consider these recommendations and incorporate them as appropriate in the CTP.



Based on more robust equity analysis, we recommend the CTP 2040 clearly define actions that should be taken to mitigate economic and environmental burdens on disadvantaged communities, and to ensure those communities receive their fair share of the benefits of transportation investments. For example, CTP strategies related to transit-oriented development should promote anti-displacement measures that include meaningful community engagement to incorporate a wide representation of impacted communities; a comprehensive no-net loss policy (a policy wherein CTP 2040 pledges to implement strategies to preserve future housing at the same levels of affordability in a given area as exists in the present); and other tools to ensure existing communities benefit from the development.

- **Promote equitable investment of transportation funds.** We recommend that the CTP 2040 promote equitable growth and development by targeting infrastructure jobs and projects to people and communities most in need of jobs, and create opportunities for local- and minority-owned businesses. For example, local hire provisions can be modeled off the recently deployed [Geographic-Based hiring preference](#) from the U.S. Department of Transportation. In addition, transportation investments should be informed by dedicated and thorough community engagement with the residents that are impacted by transportation projects. The CTP should encourage full analysis of new revenue streams' economic impact on low-income communities. The CTP 2040 should make clear that new revenue streams (e.g., road user fees, new transportation bonds or taxes, high-occupancy toll lanes and other road pricing strategies) should be reinvested in the communities affected by the strategies, with a priority on disadvantaged communities who may be burdened by the strategies.

2b. Add recommendations on the following topics:

- **Shared use mobility**—Shared use mobility options—including car-sharing and real-time ride-sharing—are providing more transportation options for Californians and have potential to reduce car ownership and single occupancy car travel. The CTP 2040 includes shared use mobility options in the Alternatives yet lacks concrete recommendations to expand shared use mobility options. The CTP should include more recommendations on how the state can leverage these services.
- **SB 375 implementation**—The Sustainable Communities and Climate Protection Act (SB 375) provides the state's most robust existing policy framework for transportation planning that results in GHG emissions reductions. Surprisingly, the draft CTP does not provide any recommendations on how to better support SB 375 implementation. For example, the Air Resources Board is currently updating the regional GHG emissions reduction targets. As the CTP 2040 Alternatives analysis



concludes that existing plans result in only limited GHG reductions, the CTP 2040 should provide policy guidance to strengthen these targets. In addition, the Alternative analysis clearly underscores the need for the SB 375 targets to continue beyond 2035 in order to achieve long-term emissions reductions.

- **Parking management**—The CTP makes clear that pricing strategies are one of the most effective transportation policies to reduce GHGs. The price of parking is central to the cost of driving; yet, the only recommendation regarding parking management is bundled with a ridesharing recommendation. The CTP should provide more recommendations on reforming parking requirements (such as eliminating mandatory parking minimums in local zoning codes) and implementing parking management (such as market-based variable parking or “performance parking”).

Recommendation #3: Help ensure that state transportation decisions will be aligned with the CTP 2040 with actionable recommendations, appropriate performance metrics, and a clear plan for tracking progress.

3a. Make the recommendations specific, actionable, and directly related to the Plan’s goals and analysis. Whether or not the modeling can be improved to include more specific strategies as suggested above, the recommendations must be more specific and actionable. The CTP should provide specific policy and investment recommendations directly related to the Plan’s Vision and analysis. Currently, one of the recommendations is: “Use the CA State Transportation Demand Model to make sound investments in communities.” This recommendation can be interpreted in many different ways. The CTP should be more specific—for example, this recommendation should be replaced with: “Apply performance metrics based on this CTP to all state transportation projects to ensure investments are consistent with the plan.” In addition, the recommendations based on the modeling analysis are the most critical piece of the CTP 2040. They should be integrated with the rest of the recommendations.

3b. Include a mechanism that will track the progress of the recommendations. The plan should also include mechanisms that will allow Caltrans to monitor and communicate to the public the progress of the recommendations over time. The CTP 2040 should be a living plan, and that will only happen if tools and mechanisms are set in place to track its progress.

3c. Include recommendations of what NOT to do. Many of the recommendations are aspirational and hard to operationalize. Providing recommendations of what NOT to do will help clarify and operationalize the Plan’s recommendations.



3d. Simplify performance metrics to easily analyze and ensure consistency of future transportation decision-making with the CTP 2040. Reduce the number of performance metrics to focus on those metrics that are most relevant to achieving state policy goals, including advancing equity. For example, as outlined by SB 743, metrics of vehicle congestion are inconsistent with the Plan and should be eliminated. Begin Chapter 8 with a simple list of project performance standards that can be used for project selection across the state. Currently, due to the unwieldy list of performance metrics, it will be very difficult to analyze consistency of transportation decisions with the CTP 2040. A simple list of standards will make it much easier to analyze and ensure consistency.

3e. Provide more specific recommendations for funding procedures and sources. The draft CTP 2040 includes some important recommendations for shifting the priorities for transportation investments. For example, there is a recommendation to “Prioritize funding toward transportation alternatives that enhance efficient and affordable mobility.” This recommendation should be complemented with more specific recommendations, such as:

- “Develop a simple list of project performance standards based on the CTP 2040 and apply them to all state investment decisions;”
- “Shift STIP funding away from roadway expansion toward multimodal safety improvements, maintenance, and smart mobility;”
- “Increase funding and staffing for the Active Transportation Program.”
- “Continue to fund Safe Routes to School projects, with a priority on those in disadvantaged communities.”
- “Prioritize funding for disadvantaged communities.”

3f. Provide an explanation of how the scenarios were developed. The history and thinking behind the scenario development is critical for future actions based on the CTP 2040. Currently, the draft CTP provides little explanation of how the scenarios were developed and how the Policy Advisory Committee informed the strategies identified in the draft Plan.

3g. Work to align other CalTrans documents with the targets and metrics of the CTP. We commend CalTrans’s new Strategic Plan, especially for including a VMT reduction target. The Strategic Plan is a good example of another state policy document well-aligned with the vision of the CTP. The CTP should directly inform this kind of target-setting and pursuant decision-making at the state.

Thank you for your work on the CTP 2040. We look forward to continuing to support the creation of a strong CTP 2040.



Sincerely

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