

Transportation Solutions Defense and Education Fund

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By E-Mail to:
ctp2040@dot.ca.gov

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

Re: Overview Comments on the California Transportation Plan 2040

Dear Mr. Corley:

The Transportation Solutions Defense and Education Fund (TRANSDEF) is an environmental non-profit focused on reducing the impacts of transportation on climate change. Our two decades of advocacy for the regional planning of transportation, land use and air quality, along with our work on Caltrans' *Smart Mobility* and the AB 32 and SB 375 updates of the CTC's *Regional Transportation Plan Guidelines*, have prepared us well to comment on the draft *California Transportation Plan 2040* (the Plan). This letter is intended to convey our general comments on the Plan, with more detailed comments coming later.

TRANSDEF commends the Plan as the much-needed first step in transforming Caltrans into a 21st Century agency. The *SSTI Assessment and Recommendations Report* (2014) observed that "... Caltrans today is significantly out of step with best practice in the transportation field and with the state of California's policy expectations." The Plan is the first Caltrans policy document we are aware of since the SSTI report to correct that mismatch. The Plan is perfectly aligned with Caltrans' new goal #3:

Make long-lasting smart mobility decisions that improve the environment, support a vibrant economy, and build communities, not sprawl.

It is an exceptionally comprehensive work, taking more factors into consideration than is typically seen in such products. It even seriously considers the long-term implications of the millennial generation's significantly different travel habits. Best of all, it lays out an actual path towards achieving the 80% reduction in GHG emissions called for in SB 391 (2009).

Culture Change in the Transportation Field

TRANSDEF is exceedingly pleased with the Plan's focus on VMT/GHG reduction strategies. We have long believed that transportation planning in the Age of Climate Change must be directed towards producing mode shift away from drive-alone, using the tools of pricing and convenient transportation alternatives. [We urge Caltrans to update the CTP 2040 Fact Sheet to highlight VMT reduction and mode shift as key.]

The Plan's most striking component is its recognition that achievement of the mandated 80% reduction in GHG emissions by 2050 will require ending Caltrans' historic role as highway builder: "Road capacity enhancing strategies were rejected due to concerns these would ultimately increase VMT." (p. 90)

This change in focus--away from the ever-increasing highway capacity of past plans--is an extraordinarily profound transformation. Transportation planning in California has always assumed drive-alone to be the default mode choice. Highways were designed to provide enough capacity for most users to drive alone. Climate change and congestion have finally forced a reconsideration of this conventional wisdom, as transportation networks cannot be expanded further in urban areas to adequately support the drive-alone mode during peak periods. Instead of the individual vehicle, the building blocks of the networks of the future will be clusters of people.

This Plan changes the paradigm to one where the State is instead funding system expansion of travel in groups, whether via carpool, transit or active modes. Despite the individualism that has long dominated the culture, the Plan gently hints that we are all in this together. California's urban areas will become more like Europe and Japan, with their prominent transit and active modes.

Ending highway widening will be a major shock to the contractor/local government/CMA/MPO/CTC/Legislature ecosystem. While Caltrans will still have the considerable responsibility of maintaining its aging facilities, the political attention that accompanies new highway projects will necessarily shift to transit projects. The State's capacity expansion program will maintain transportation construction spending levels, but will build transit instead. This may require new skill sets and possibly new vocabularies. This change to the status quo will inevitably encounter resistance and backlash.

TRANSDEF proposes the addition of an Implementation chapter to the Plan, to deal proactively with that backlash. Detailed planning is needed for explaining this massive shift in state policy to the public and to transportation stakeholders.

It's often been said in the advocacy community that climate change requires a mobilization on the scale of the response to the attack on Pearl Harbor. During World War II, all production was shifted to the war effort. Rationing and other wartime requirements resulted in significant shifts in how people lived. Californians have not yet been asked to mobilize to support a reduction in GHGs. They need leaders that can explain why our lives need to shift now, and what that will entail. The political will for climate-oriented policies will require a learning process and motivation-building.

In the optimal roll-out scenario, Governor Brown would take the lead in promoting the Plan, as it offers the specifics on how to accomplish the goals he set in his Executive Order B-16-12.

The degree of upset and controversy that will come to transportation culture requires individuals that are personally committed to leading on climate change. It is critical that Legislators personally endorse the Plan by passing a bill that approves the direction set in the Plan as fulfilling the requirements of SB 391 (2009). It will be necessary to enact structural changes--perhaps including a Constitutional Amendment--to allow highway funding to be used for transit construction and operations.

Change is likely to be especially difficult at the CMAs and at the CTC. These bodies have very conservative practices, by which projects remain on their lists for decades. Now that state policy is changing to no longer support road capacity expansion, project lists will need to be reviewed and reoriented. The CTC's *Statewide Transportation Systems Needs Assessment* (2011) included approximately \$103 billion for highway and local road system expansion, which is roughly 39% of the total infrastructure need. That is a very large sum to reprogram, especially since transportation project selection typically involves interest-trading. Breaking long-standing promises is likely to result in bitter fights. However, because the no-capacity-expansion policy is to be applied across-the-board, no one individual project can raise the "Why single me out?" defense.

Transportation leaders will need to shift their focus to improving mobility without increasing VMT. (Recent countywide transportation plans in the Bay Area show a 35% increase in VMT between now and 2040. These trends must be reversed.) Leaders of general-purpose governments will need to shift their focus to planning for development that does not increase VMT. This policy shift will greatly expand the need for planning funds, and for planners with appropriate recent multimodal training (or retraining).

HOT Lanes

TRANSDEF has only one policy disagreement with the Plan. We have consistently opposed HOT lanes, whether they are called HOT lanes or repackaged as managed lanes or Express Lanes. The sole purpose for such lanes is to facilitate the drive-alone mode). Over-dependence on the drive-alone mode is at the heart of the congestion crisis faced in California's metropolitan areas. HOT lanes were obviously invented to forestall the equally obvious need to change driver behavior--in a shortsighted attempt to push the discomfort of culture change further down the road.

To provide a seemingly legitimate policy rationale, HOT lanes have been promoted as a baby-step towards road pricing. However, climate change required policy implementation a decade ago: there is no longer any time to wait to "ease" drivers into mileage charges. If the State is to be serious about GHG emissions reductions, road pricing is needed now. TRANSDEF is partial to the revenue-neutral form of road pricing, where gas taxes or sales taxes are reduced as road pricing is implemented. The added benefit is that road pricing is the single most effective method of reducing congestion. To

ensure that drivers in urban areas have a reasonable choice, pricing must be phased in, when new convenient transit alternatives become available.

The Plan calls for the State to be doing everything possible to encourage mode shift. We believe that HOT lanes send a conflicting message to the public that "CMAs and MPOs are helping you continue to drive alone." Caltrans should oppose the authorization and funding of HOT lanes.

Conclusion

TRANSDEF is extremely pleased with the draft Plan. It will be essential in steering transportation policy into a direction that is coherent with adopted State GHG emissions reduction goals. We thank Caltrans for its excellent work. We will later be issuing a second letter, with detailed comments on the Plan.

Sincerely,

/s/ DAVID SCHONBRUNN

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