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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>

December 3, 2020

Mr. Toks Omishakin, Director
California Department of Transportation
1120 N Street
Sacramento, CA 95814

RE: Draft 2020 California Aviation System Plan

Director Omishakin:

Thank you for the opportunity to provide comments on the Draft 2020 California Aviation System Plan (plan). The California Department of Transportation (Caltrans) has not substantively updated this plan in ten years and the Commission appreciates the efforts to prepare a comprehensive plan that aligns with state statutory requirements, federal regulations, and the objectives of the California Transportation Plan 2050. The Commission strongly advises that Caltrans adhere to the statutory requirement to update the plan every five years to ensure that statewide aviation system planning remains current and of relevance to California's airports. Once finalized, the 2020 California Aviation System Plan will help inform aviation planning and funding decisions that will shape how both general and commercial aviation functions within the overall multi-modal transportation system. The Commission offers the following comments and recommendations to inform the final plan and its implementation.

Clearly Addressing Statutory Requirements

California Public Utilities Code Section 21702(a) – (h) provides clear and specific direction for the contents of the plan. Within the draft plan it is difficult to determine how each of these elements and requirements are being addressed. In particular, the plan would benefit from more detailed information regarding the aviation elements of regional transportation plans.

Conveying the Importance of Aviation to Decisionmakers and the Public

It is important the plan positively demonstrates that aviation is an integral part of California's multimodal transportation system. The plan should serve as a tool for the public and decisionmakers at all levels of government to understand the value of general and commercial aviation in California. In order to achieve this objective, we recommend:

- The plan should avoid the use of jargon whenever possible and should place technical information in appendices to improve document readability. The plan is an important document that can be used to identify the role and importance of aviation to California. Although the plan should supply technical information, the document should also be written in a way that informs decisionmakers who may not be well versed in aviation issues.
- The Executive Summary should incorporate simple graphics to convey important facts and messaging about the impact and importance of aviation in California as well as key policy recommendations. The Washington State Aviation System Plan Executive Summary provides a good example of simple, effective messaging for decisionmakers and the public:
<https://wsdot.wa.gov/sites/default/files/2015/12/08/aviation-washington-aviation-system-plan-summary.pdf>
- The Executive Summary should include a simple explanation of the difference between general and commercial aviation as well as a map or other graphic of the general aviation airports in the state.
- The Executive Summary should include a statement highlighting the amount of economic output and number of jobs that aviation generates in California, similar to the statement in Chapter 2, page 46. The economic impact of aviation (number of jobs, value of air cargo etc.) in California should be clearly articulated and easily understood by decisionmakers.
- Caltrans should work with the Federal Aviation Administration to analyze and better understand the impacts of COVID-19 on the aviation industry and California's economy. Once updated aviation forecasts are available, this information should be considered in the next plan update.

Addressing Aviation Air Quality Challenges

The plan should include the most applicable and accurate data regarding aviation emissions of greenhouse gases and aircraft criteria pollutant emissions in California. While we understand that using 1990 emissions data as the baseline for measure is consistent with the direction of Executive Order B-32-15 and subsequent legislation on climate change goals, Caltrans should acknowledge the existing growth in aviation air pollution and greenhouse gas emissions reported by the California Air Resources Board. Aviation Air Quality should be identified as a “challenge” under Section 6.6.5, Address and Adapt to Climate Change, and this section should include policy recommendations and measures to align the plan with air quality and climate goals outlined in the California Transportation Plan 2050.

Prioritizing and Highlighting the Financial Needs of Aviation

Chapter 2 outlines significant financial needs for aviation in the state of California as well as potential revenue sources that could help close the funding gap.

Please include an analysis and discussion of how needs are prioritized and how funding could be consolidated and focused to result in strategic improvements with meaningful impact. The plan should help decision makers better understand where additional aviation facilities are most needed and if the consolidation of existing facilities could result in improved investment efficiencies.

Consolidating Policy Recommendations

The plan contains many innovative and crosscutting policy recommendations to improve aviation in a manner that supports the goals of the California Transportation Plan 2050. Consolidating policy recommendations into a single section or chapter could help decisionmakers focus on the breadth of need for the system. This is consistent with Public Utilities Code Section 21702(h) which directs the plan to include a summary and conclusion element containing findings and recommended courses of action.

The Commission appreciates the opportunity to provide comments for consideration. If you have any questions please contact Laura Pennebaker, Acting Deputy Director, at (916) 654-4245.

Sincerely,

HILARY NORTON
Chair

c: Commissioners, California Transportation Commission

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REVISED ATTACHMENT A

David Kim, Secretary, California State Transportation Agency
Jeanie Ward-Waller, Deputy Director of Planning and Modal Programs, Caltrans
Amy Choi, Aeronautics Division Chief, Caltrans