

DEPARTMENT OF TRANSPORTATION

OFFICE OF THE DIRECTOR
P.O. BOX 942873, MS-49
SACRAMENTO, CA 94273-0001
PHONE (916) 654-6130
FAX (916) 653-5776
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life.

January 18, 2021

Ms. Hillary Norton
Chair
California Transportation Commission
1120 N Street, MS-52
Sacramento, CA 95814
P.O. BOX 942873

Dear Ms. Norton:

The California Department of Transportation (Caltrans) would like to thank the California Transportation Commission (CTC) for taking the time to provide comments on the Public Draft of the California Transportation Plan (CTP) 2050. We want to ensure that the CTP is a cohesive planning document that can be utilized by all our state, regional, and local partners. Your valued input improves our efforts to create a visionary long-range plan that implements innovative transportation policies to help California reach its ambitious goals.

Caltrans has prepared a response to the comments provided from your recent letter. Caltrans looks forward to working together with the CTC to complete the CTP 2050.

Please see the following responses to CTC comments. CTC comments are shown in italic:

- 1. In order to help facilitate a pragmatic and fruitful conversation with stakeholders around implementation of the plan, Caltrans should publicly disseminate a simple outline of the underlying planning assumptions associated with the 2050 Baseline, Transportation Focus, Land Use Focus, and Combined Scenarios. This will help local and regional partners as well as other state agencies and advocacy organizations better understand the magnitude of effort and partnership needed to implement the plan.*

Response: Caltrans developed a modeling assumption factsheet and released it to our partners to aid in reviewing the public draft. The factsheet is available on the CTP website and will continue to be available during the plan's life.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

2. *Caltrans should consider modifying planning assumptions to ensure that they are reasonable considering the COVID-19 pandemic. For example, on p. 73 the plan includes an assumption that 50 percent of all Californians will telework by 2050 - yet at the height of the COVID-19 pandemic, it was estimated that only 34 percent of Californians were in fact teleworking. Telework is an important strategy; however, it is also important to consider that not all jobs are suitable for telework and not all home environments are conducive to remote work.*

Response: The CTP modeling assumptions are geared towards meeting Greenhouse Gas (GHG) emission reductions targets. Caltrans reevaluated some of the modeling assumptions to reflect Executive Order (EO) N-79-20 and reduced telework assumptions to 25 percent, based on lessons learned from the COVID-19 pandemic.

3. *Caltrans should consider modifications to planning assumptions and strategies that may be needed to address the issuance of Governor's Executive Order N 79-20 requiring 100 percent of new passenger vehicles to be zero-emission by 2035. For example, in light of the future greenhouse gas emissions reductions associated with increased zero-emissions vehicles mandated by the EO, is a Vehicle Operating Cost increase of 50 percent associated with Recommendation #10 "Pricing Roadways to Improve the Efficiency of Auto Travel" still necessary to meet climate goals?*

Response: As stated in response to Comment #2, Caltrans explored the mix of strategies in CTP 2050 in response to the new EO. We reviewed the Draft California Air Resources Board (CARB) Mobile Source Strategy 2020 for the deployment of new ZEV fleet-mix. Within the EO and the CARB Mobile Source Strategy, it is noted that the increase in ZEV vehicles alone will not meet emissions targets. The strategies within the CTP are designed to work together to encourage mode shift away from single-occupancy vehicles. This shift is critical not only to reduce GHG emissions but also supports all CTP 2050 goals and helps create a transportation system that meets the vision of the plan. While reviewing this data, it became apparent that Caltrans must continue to collaborate with CARB to better understand the impacts of N-79-20. The next iteration of the CTP will fully incorporate changes to the fleet as outlined by N-79-20. Caltrans is dedicated to fully understanding the GHG impacts of the new EO.

- 4. The plan is truly a visionary document that pushes California to create a transportation system that delivers benefits to safety, climate, economy, quality of life & public health, equity, accessibility, environment and infrastructure. The financial and technical resources needed to achieve this vision are significant. The public, as well as our transportation partners, should understand the cost of this vision so that we may all rise to the occasion and work together to achieve it. Clear messaging around the fiscally unconstrained nature of the CTP 2050 would be helpful. For example, inclusion of a high-level analysis of what the plan would cost to implement and a clear statement of what we need to achieve the vision, such as more revenue and better tools, would help set the tone for implementation efforts.*

Response: Caltrans expanded on the nature of the CTP and its role as a fiscally unconstrained plan. The plan elaborates on this discussion within the financial and economic elements to illustrate the magnitude of changes necessary to meet the state's vision. As a fiscally unconstrained planning guidance document, high-level policy discussion differentiates between the unconstrained nature of the CTP from a fiscally constrained Regional Transportation Plan (RTP) on a statewide scale.

- 5. Caltrans should consider modifications to revenue assumptions and strategies that may be needed to address the issuance of EO N-79-20, which requires 100 percent of new passenger vehicles be zero-emission by 2035. For example, the EO will presumably result in a decline of federal and state fuel tax revenues, which will impact our ability to operation and maintain our road system and an already insolvent federal Highway Trust Fund.*

Response: CTP 2050 includes recommendations that support implementing a revenue and Vehicle Miles Traveled (VMT) neutral replacement to the gas tax, specifically the Road Charge Program. Staff coordinated with the Road Charge Program to ensure the CTP is consistent with their efforts.

- 6. We applaud Caltrans on the development of an Implementation Element and urge thorough, robust stakeholder engagement on this effort. The Implementation Element development process should clearly acknowledge that while the plan itself is not fiscally constrained,*

implementation of the plan will happen in a fiscally constrained environment. As such, Caltrans must clearly identify the gap between Regional Transportation Plans and the statewide plan and focus implementation efforts on working with local, regional, state, and federal governments as well as energy and broadband partners to leverage policy, financial, and technical resources to bridge that gap.

Response: We will continue to refine our implementation efforts as we approach the completion of the plan. Following the completion of the CTP 2050, we will engage with stakeholders to refine performance metrics –to bridge the gap of incorporating recommended strategies of a fiscally unconstrained plan into actions that can be refined and adopted into fiscally constrained RTP strategies.

7. *The Implementation Element should reflect the horizon of the plan and it should identify near, mid, and long-term implementation activities from 2021–2050. Consistent with the 2017 California Transportation Plan Guidelines, the Implementation Element should also specify: The lead agency and parties responsible for implementation of the various recommendations and actions, an analysis of statutory changes that may be needed, as well as an estimated timeframe for completion. Simple, measurable, achievable, relevant, and timebound Performance Metrics should also be identified within the Implementation Element and utilized to demonstrate plan performance and progress. The Commission intends to have Caltrans report annually on the state’s progress toward the vision outline in the plan.*

Response: The CTP 2050 Implementation Plan will include information on lead agencies, parties responsible, and a timeframe for implementation for the Recommendations chapter. The CTP 2050 Implementation Plan will also identify performance metrics and actions requiring statutory changes. These are subject to change as implementation evolves through the stakeholder process identified in the response for Comment #6.

8. *Caltrans should work with stakeholders during the implementation process to minimize equity implications of the roadway pricing strategy. We recommend that Caltrans add privacy, data security, and consumer choice to the guiding principles of Recommendation #10 “Pricing*

Roadways to Improve the Efficiency of Auto Travel.” We also recommend that the plan acknowledge the previous Road Charge Pilot Program that was undertaken in 2015 as well as research that Caltrans has completed or is underway related to road usage charging. This would reflect the fact that studying roadway pricing is ongoing work for the state rather than an entirely new effort.

Response: An additional principle was added to ensure data security. CTP 2050 acknowledges the Road Charge in Recommendation 14: Seek Sustainable, Long-Term Transportation Funding Mechanisms. Considering the new EO, Caltrans expanded the discussion on the Road Charge in this recommendation. The Plan supports Road Charge (separate from congestion pricing and increased auto operating cost) as a revenue and VMT neutral replacement to the gas tax.

9. *During the implementation element development process, Recommendation #10 should be carefully discussed with local and regional partners responsible for implementing congestion pricing, cordon pricing, tolling, parking pricing, etc. This conversation is critical to ensure that this strategy does not disproportionately affect communities not served by transit and employment sectors not conducive to transit commutes. It is important to note that the concept of statewide roadway pricing as an infrastructure financing mechanism has mainly been studied in California, per statute, as a revenue neutral replacement for the current fuel tax structure. Any deviation from this policy trajectory should be clearly noted, discussed with stakeholders, and explained in the Implementation Element.*

Response: CTP 2050 supports Road Charge as a revenue and VMT neutral replacement to the gas tax. Congestion pricing and any other form of behavior pricing is a separate topic within the CTP 2050, and will require collaboration throughout the state. CTP 2050 sets the baseline for these conversations and will be expanded through various state and regional efforts, including CTP implementation.

10. *The plan notes that pricing revenues should fund alternatives to driving, it is also recommended that the plan acknowledge the need for this revenue to fund the operations and maintenance of the entire multimodal system including roadways which support all modes.*

Response: Caltrans clarified within CTP 2050 that funding generated by the Road Charge will fund the maintenance of roadways, whereas any potential revenue generated by congestion pricing will support the broader multimodal system to encourage mode shift and provide alternatives to single-occupancy vehicles. The resulting mode shift will further reduce VMT and GHG emissions.

11. The Commission's Road Charge Technical Advisory Committee provides an existing public forum of subject matter experts where some of these roadway pricing discussions should occur during plan implementation.

Response: Caltrans will work with CTC staff on how best to coordinate our efforts with the Road Charge Technical Advisory Committee.

12. To ensure transparency and accountability in the development and delivery of an Implementation Element, we request Caltrans report annually to the Commission on the status of plan implementation.

Response: Caltrans will work with our stakeholders including Strategic Growth Council and CTC staff to develop the format of this report. This collaborative process will be outlined in the Implementation Element.

13. During the October meeting there was also a verbal request for a copy of the CTP Policy Advisory Committee member list and further detail on the membership selection process.

Response: A full list of the CTP Policy Advisory Committee (PAC) members is included with this letter. The PAC was formed by seeking a diverse group of representatives from various governmental agencies, stakeholders, tribal governments, and advocacy groups, in addition to meeting Government Code 65073 which requires that Caltrans consult with the following agencies during the CTP development process:

- California Transportation Commission
- Strategic Growth Council
- California Air Resources Board
- State Energy Resources Conservation and Development Commission

Ms. Hilary Norton
January 18, 2021
Page 7

- Air quality management districts
- Public transit operators
- Regional Transportation Planning Agencies

Again, we thank the CTC for its ongoing efforts to coordinate and partner with Caltrans. The comments provided by you have been crucial to the development of the CTP 2050.

If you have any further questions or concerns regarding the CTP 2050, please contact Marlon Fournoy, Chief, Division of Transportation Planning, at (916) 653-1818 or by email sent to Marlon.Fournoy@dot.ca.gov.

Sincerely,



TOKS OMISHAKIN
Director

Attachment
Policy Advisory Committee Member List

c: Commissioners, California Transportation Commission
David Kim, Secretary, California State Transportation Agency
Jeanie Ward-Waller, Deputy Director, Planning and Modal Programs,
Caltrans

EXTERNAL STAKEHOLDERS			
Name	Organization	Title	Committee
Rhonda Rabano	Manchester Point Arena	Tribal Govt	PAC
Margaret Park	Agua Caliente Band of Cahuilla Indians	Director of Planning and Natural Resources	PAC
Matt Maloney	MTC	Acting Director	PAC
Matt Carpenter	SACOG	Director of Transportation Services	PAC
Louise Bedsworth	Strategic Growth Council	Executive Director	PAC
Elizabeth O'Donoghue	The Nature Conservancy of California	Director of Sustainable Development Strategy	PAC
Antonio Johnson	FHWA	Planning Team Leader	PAC
Avital Barnea	CalSTA	DEPUTY SEC PRJ MGMNT & IMPDOT	PAC
Benjamin Kimball	TCAG	Deputy Executive Director	PAC
Margaret Cederoth	California High-Speed Rail Authority	Director of Planning and Sustainability	PAC
Eric Thronson	California State Assembly Committee on Transportation	Chief Consultant	PAC
Josh Rosa	Housing and Community Development	Staff Services Manager III	PAC
Randy Chinn	Senate Transportation Committee	Chief Consultant	PAC
Chris Ganson	Governor's Office of Planning and Research	Senior Advisor for Transportation	PAC
Chanelle Fletcher	Climate Plan	Executive Director	PAC
Kamyar Guivetchi	DWR	Division Chief Division of Planning	PAC
Jay Harris	DOR	Staff Services Manager I	PAC
Josh Meyer	Local Government Commission	Community Design Program Director	PAC
Kate Breen	SFMTA	Government Affairs Director	PAC
Julia Caplan	Public Health Institute	Program Director	PAC
Joshua Stark	Transform California	State Policy Director	PAC
Jeffrey Rosenhall	CDPH	Section Chief	PAC
Jared Sanchez	CalBike	Senior Policy Advocate	PAC
Heather Adamson	AMBAG	Director of Planning	PAC
Kelly Hargreaves	DOR	Chief Deputy Director	PAC
Jennifer Gress	Air Resources Board	Division Chief	PAC
Esther Rivera	California Walks	Deputy Director	PAC
Elizabeth Bugarin	MTC	Regional Planning Program	PAC
Connell Dunning	US EPA	Region 9 Staff	PAC
Steve Cliff	Air Resources Board	Deputy Executive Officer	PAC
Bill Sadler	Public Health Alliance of Southern California	Director of Operations	PAC
Brian Taylor	UCLA Institute of Transportation Studies	Director	PAC
David Zisser	Housing California	Associate Director	PAC
Coleen Clementson	SANDAG	Director of Planning and Land Use	PAC
Bill Higgins	CALCOG	Executive Director	PAC

Elisa Arias	SANDAG	Principal Regional Planner	PAC
Naresh Amatya	SCAG	Transportation Planning Manager	PAC
Nikita Sinha	California Walks	Program Manager	PAC
Sarah Jepson	SCAG	Director	PAC
Laura Pennebaker	CTC	Associate Deputy Director	PAC
Mike Woodman	Nevada County Transportation Commission	Deputy Executive Director	PAC
Maura Twomey	AMBAG	Executive Director	PAC
Mardy Thomas	Glenn County Planning and Public Works Agency	Principal Planner	PAC
Ted Link-Oberstar	Senate Office of Research	Policy Consultant	PAC
INTERNAL STAKEHOLDERS			
Reza Navai	Caltrans	Assistant Division Chief	PAC
Ellen Greenberg	Caltrans	Deputy Director of Sustainability	PAC
James Davis	Caltrans	Chief Deputy Director	PAC
Jeanie Ward-Waller	Caltrans	Deputy Director of Planning and Modal Programs	PAC
Chris Schmidt	Caltrans	Deputy Director	PAC
Blair Thompson	Caltrans	C.E.A. Range-A	PAC