

# Memorandum

To: CHAIR AND COMMISSIONERS

CTC Meeting: January 26-27, 2022

From: MITCH WEISS, Executive Director

Reference Number: 4.6, Action - *Replacement*

Prepared By: Brigitte Driller

Assistant Deputy Director

Published Date: January 21, 2022

Subject: Comments on Draft California Transportation Plan Implementation Report

## **Recommendation:**

Staff recommends the California Transportation Commission (Commission) approve the attached comment letter (Attachment A) for transmittal to Caltrans in response to the Draft California Transportation Plan Implementation Report (Report).

## **Issue:**

On January 20, 2022, Caltrans released the Draft California Transportation Plan Implementation Report (Report). The Report is available at: <https://dot.ca.gov/programs/transportation-planning/division-of-transportation-planning/state-planning-equity-and-engagement/california-transportation-plan>, and California Department of Transportation (Caltrans) is accepting comments through February 14, 2022. The Report is the first of its kind, and the Commission has requested that Caltrans report on implementation progress annually.

## **Background:**

Pursuant to federal regulation and state statute, Caltrans is required to prepare a statewide, long-range transportation plan every five years. On February 3, 2021, Caltrans published the California Transportation Plan (Plan) 2050, which establishes a policy roadmap to improve mobility and accessibility in the state while reducing greenhouse gas emissions related to transportation. The Plan also informs the goals and projects of Caltrans' six modal plans, which in turn help to implement the policy direction of the Plan. It is available at: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/ctp-2050-v3-a11y.pdf>.

Caltrans presented the draft Plan to the Commission at the October 21-22, 2020 Commission Meeting. The Commission transmitted formal comments to Caltrans via letter on October 22, 2020, which is included as Attachment B. In the letter, the Commission emphasized the importance of communicating and working closely with partner agencies on

implementation efforts and requested that “Caltrans report annually to the Commission on the status of plan implementation.”

On January 20, 2022, Caltrans released the Draft Report for public review and comment. Staff has reviewed the Report and a proposed comment letter is included as Attachment A. Here is a high-level summary of comments in the letter:

- The Report should include a description of how agencies other than Caltrans will support ongoing implementation activities.
- The Report should articulate the role that Regional Transportation Plans play in advancing implementation.
- In the Plan, each of the 14 recommendations has actions associated with it, but the actions are not discussed in the Report. Caltrans should explain how these actions will factor into implementation and reporting moving forward.
- The Report should describe how future Implementation Reports will incorporate more information on performance metrics.
- The section on Program Funding contains several errors and omissions that should be addressed prior to finalizing the Report.

Attachments:

Attachment A – California Transportation Commission Comment Letter on Draft California Transportation Plan Implementation Report

Attachment B – California Transportation Commission Comment Letter on Draft California Transportation Plan 2050

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SENATOR JOSH NEWMAN, Ex-Officio

MITCH WEISS, 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>

January 27, 2022

Mr. Toks Omishakin, Director  
California Department of Transportation  
1120 N Street, MS 49  
Sacramento, CA 95814

RE: California Transportation Commission Comments on the Draft California  
Transportation Plan Implementation Report

Dear Director Omishakin:

Thank you for the opportunity to provide comments on the draft California Transportation Plan Implementation Report (Report). We appreciate the California Department of Transportation's (Caltrans) efforts to reach this important milestone toward implementing the California Transportation Plan, consistent with the direction of the California Transportation Commission's (Commission) California Transportation Plan Guidelines. We also appreciate Caltrans' acknowledgement that while the California Transportation Plan is a fiscally unconstrained document, implementation will occur in a fiscally constrained environment.

The Commission respectfully provides the following comments, questions, and recommendations for your consideration:

1. The Plan provides in its Executive Summary an overview of what the Implementation Element will entail (p. 9). According to the Plan, "Caltrans will develop an Implementation Element, which identifies the requirements necessary to implement actions... including agency responsibilities, implementation steps, and timelines." However, many of the listed components – such as timeframes, details for each action, responsible parties, financial analysis, etc. – are absent from the Report. Caltrans should include the omitted implementation sections in the final report.

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2. The California Transportation Plan (Plan) 2050 correctly highlights that successful implementation “will require the sustained commitment and cooperation of [Caltrans] and other State agencies, and the visionary leadership of local and regional partners” (p. 3). However, the Report focuses almost exclusively on Caltrans-led activities. Please update the report to include a description of how other agencies will and are supporting ongoing implementation activities.
3. To better highlight the implementation link between local and regional partnership efforts, Caltrans should articulate the role Regional Transportation Plans play in advancing implementation of the California Transportation Plan.
4. In the Plan, each of the 14 recommendations has actions associated with it, but the actions are not discussed in the Report. Caltrans should provide an update on the 14 recommendations and associated actions in future annual reports to the Commission.
5. Please add reference to the Assembly Bill 285 (2019, Friedman) report that is under development and how the findings might influence implementation efforts in the future.
6. What is the timeline for the activities detailed in the Data Monitoring and Display section? In addition, the Report should describe how future Implementation Reports will incorporate more information on performance metrics.
7. In the section on Program Funding, Caltrans should articulate that in addition to state programs there are other funding sources that support transportation, including federal and local sources. In addition, there are several errors and omissions in this section. Please address the following issues:
  - a. The Trade Corridor Enhancement Program also receives federal funds annually, which are not reflected in the annual funding amount.
  - b. The Local Partnership Program also has a formulaic portion that should be included in the Discretionary Program Funding table.
  - c. The regional portion of the State Transportation Improvement Program as well as the Local Streets and Roads Program should be listed in the Discretionary Program Funding table as local discretionary funding sources that support transportation infrastructure.

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The Commission appreciates the opportunity to provide comments for consideration. We look forward to receiving an update on how Commission comments informed the final Report at the March 16-17, 2022 Commission Meeting. If you have any questions please contact Laura Pennebaker, Deputy Director for Transportation Planning, at (916) 654-4245 or email [Laura.Pennebaker@catc.ca.gov](mailto:Laura.Pennebaker@catc.ca.gov).

Sincerely,

HILARY NORTON

Chair

c: Commissioners, California Transportation Commission

Elissa Konove, Acting Secretary, California State Transportation Agency

Jeanie Ward-Waller, Deputy Director, Caltrans Planning and Modal Programs

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JOSEPH TAVAGLIONE

STATE OF CALIFORNIA



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

MITCH WEISS, Executive Director

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SACRAMENTO, CA 95814  
P. O. BOX 942873  
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FAX (916) 653-2134  
<http://www.catc.ca.gov>

October 22, 2020

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

RE: Draft California Transportation Plan 2050

Director Omishakin:

Thank you for the opportunity to provide comments on the Draft California Transportation Plan (Plan) 2050. The Commission recognizes that in addition to significant federal and state requirements to address areas such as safety, economy, and equity, the plan must also meet ambitious greenhouse gas emissions reduction targets and support clean transportation goals that have been established in California. The plan identifies a policy framework for multimodal integration that strives to meet climate change goals while improving mobility and accessibility for all. This is no easy task, and we commend Caltrans and other stakeholders for their extensive efforts to prepare this document.

Once finalized, the plan will guide long-term multimodal planning and form the basis for future investment decisions that will shape California's transportation system. Therefore, it is important for the plan as well as implementation efforts associated with it to 1) clearly articulate planning assumptions and acknowledge financial resource constraints the state may encounter in the future and 2) work with stakeholders to address the challenge of implementing the plan and meeting climate, equity, and other goals in a fiscally constrained planning and project delivery environment.

It is with this understanding that the Commission offers the following comments and recommendations to inform the final plan and its implementation.

### **Planning Assumptions and Fiscal Constraint**

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.
2. Caltrans should consider modifying planning assumptions to ensure that they are reasonable in light of the COVID-19 pandemic. For example, on p. 73 the plan includes an assumption that 50% of all Californians will telework by 2050 - yet at the height of the COVID-19 pandemic, it was estimated that only 34% 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.
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 (EO) requiring 100% 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 (VOC) increase of 50% associated with Recommendation #10 "Pricing Roadways to Improve the Efficiency of Auto Travel" the most effective and equitable mechanism to help achieve climate goals or could other strategies in the plan to promote mode shift be emphasized?
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

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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.

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% of new passenger vehicles be zero-emission by 2035. For example, the Executive Order will presumably result in a decline of federal and state fuel tax revenues, which will impact our ability to operate and maintain our road system and rely upon an already insolvent federal Highway Trust Fund.

### **Plan Finalization, Implementation & Performance Measurement**

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.
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 time-bound 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.
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.

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.
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.
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.
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.

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.

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RE: Draft California Transportation Plan 2050  
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Sincerely,



HILARY NORTON  
Chair

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