ATTACHMENT B

AFFILIATED AGENCIES

Orange County Transit District

Local Transportation Authority

Service Authority for Freeway Emergencies

Consolidated Transporation Service Agency

Congestion Management Agency

October 22, 2020

Ms. Jeanie Ward-Waller
Deputy Director of Planning and Modal Programs
California Department of Transportation
P.O. Box 942873
Sacramento, CA 94273-0001

Re: **Draft California Transportation Plan 2050**

Dear Ms. Ward-Waller:

The Orange County Transportation Authority (OCTA) appreciates the opportunity to review and comment on the Draft California Transportation Plan (CTP) 2050 statewide transportation policy planning document. The California Department of Transportation (Caltrans) has been charged with developing a CTP that identifies goals, policies, strategies, and performance measures that demonstrate how the statewide transportation system can reduce transportation sector greenhouse gas (GHG) emissions to 1990 levels by 2020, and 80 percent below 1990 levels by 2050. The statutory GHG goals are complicated by recently announced executive orders, which are likely to facilitate further legislative proposals on this subject. OCTA commends Caltrans for producing a Draft CTP and taking a difficult challenge.

Given that the purpose of the CTP is to inform transportation policy and planning decisions, the CTP 2050 and the forthcoming related report from the Strategic Growth Council, as required by AB 285 (Chapter 605, Statutes of 2019), will impact subsequent local and regional plans, including Regional Transportation Plans/Sustainable Communities Strategies (RTP/SCSs). Therefore, to provide clarity to all stakeholders, OCTA requests that Caltrans:

- Further emphasize how the CTP, which serves as an aspiration vision, is different from financially constrained RTP/SCSs;
- Daylight the assumptions included in the CTP 2050;
- Commit to conducting a feasibility analysis; and
- Update the modeling analysis to account for Executive Order N-79-20.

At a minimum, the CTP should accurately describe key differences between the CTP and regional plans in the areas of financial constraint analysis, scrutiny of planning assumptions, and lack of environmental review. The CTP should acknowledge its reliance on assumptions that cannot be included in an RTP/SCS, particularly with respect to transportation conformity. A list of CTP 2050 assumptions should be created with a description of how and why the assumptions differ from the most recent RTP/SCS. OCTA believes this will help prevent misunderstandings that could result from the different planning assumptions used in the CTP 2050 versus regional plans. These details and shared understanding will improve the ability of local, regional, state, and other stakeholders to have constructive conversations about how best to achieve the CTP 2050's vision.

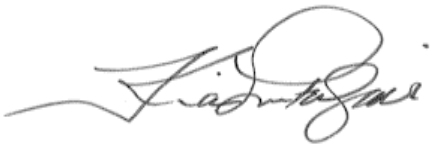
OCTA recommends daylighting the assumptions used in the CTP 2050 to meet the GHG emission reduction goals and CTP 2050's vision. As the California Air Resources Board's SB 150 (Chapter 646, Statutes 2017) report concluded, California at the state, regional, and local levels is not on track to meet GHG emission reduction goals and will need to employ increasing aggressive strategies to meet mandates for 2030 and beyond. The State of California cannot achieve aggressive climate goals without an honest and open conversation about costs, impacts, and tradeoffs.

Government Code Section 65072.2(a) requires the CTP to address "how the state will achieve maximum feasible emissions reductions" consistent with state goals. However, feasibility is not considered in the Draft CTP despite this statutory language. The CTP does not estimate the costs, nor truly assess the likely availability of funds. Nor does the Draft CTP evaluate the statutory authority needed to implement several of the assumptions in the plan. As a result, it cannot be ascertained from the information provided if the plan achieves maximum feasible emissions. OCTA recommends that Caltrans commit to conducting a feasibility analysis of its various strategies within twelve months of finalizing the CTP 2050 to ensure the information can inform the Strategic Growth Council report. The feasibility analysis should also be developed in "cooperative process involving local and regional government, transit operators, congestion management agencies, and the goods movement industry" consistent with Government Code Section 65070(a).

Finally, OCTA recommends that the Final CTP 2050 conduct an analysis of the impacts Executive Order N-79-20 and revise the plan accordingly.

Again, thank you for the opportunity to comment on the Draft CTP 2050.

Sincerely,



Kia Mortazavi
Executive Director, Planning

KM:ww
Attachment

OCTA Comments on Draft California Transportation Plan 2050

California Transportation Plan 2050 – Main Document

- General. Unclear if references to "Los Angeles" is to the city or county or to the "Los Angeles Area" as defined in Figure 7. The same Los Angeles Area is defined as "SCAG Coastal" in the Technical Analysis Element.
- Executive Summary, Page 4: CTP 2050 Goals. Equity – consider expanding to reflect USDOT's definition of Environmental Justice.
- Executive Summary, Page 6: Plan Benefits. Economy – clearly state that the economic impacts are for the year 2050 alone. The source should also reference the economic impact analysis.
- Executive Summary, Page 8: Implementation. Expand on the differences between RTPs and the CTP. For instance, the CTP does not include a project list and is not required to conduct a CEQA analysis on the plan nor meet federal transportation conformity requirements.
- Introduction, Page 11. Note that only "hundreds of Californians" have participated in the development of the CTP while "thousands" are typical of RTPs.
- Introduction, Page 12: A Call to Action. Clarify how resources will be redirected to marginalized communities.
- Introduction, Page 13: Our Challenges. Important to highlight that the CTP 2050 is required by law to show how the transportation sector will contribute to the mandatory statewide GHG emission reduction target for 2050.
- Introduction, Page 19: How the Plan was Developed. Documentation of the off-model techniques is missing and is not sufficiently addressed in the Technical Analysis Element. Clarify what off-model analysis was conducted and how it influenced the recommendations.
- Our Diverse State, Page 25: Our Geography. Note that many urban and suburban areas also struggle with poor connectivity and access to multimodal options.
- Our Diverse State, Page 27: Table 1. Roadway congestion should also be listed as a challenge in the Urban Geography. Lack of travel options and projects often uncompetitive for grant funding should also be listed as challenges in the Suburban Geography.
- Our Diverse State, Page 28: Population. Explain the difference between the MPO forecasted growth and that from DOF. Is part of the difference due to using latest DOF and older MPO forecasts? In the case of the SCAG region, it appears that the 2016 RTP/SCS was used in development of the CTP 2050. However, the local input on the 2016 RTP/SCS is from 2014 – meaning that the assumptions on growth will be over six years old by the time the CTP is finalized.
- Our Diverse State, Page 30: Demographic Trends. An Aging Population – It may be worth noting the impacts on revenue sources from an aging population.
- Our Multimodal System, Page 40: Figure 14. Consider retitling the figure to better match was is in the graphic. Also, add a reference to VMT for the upper part of the graphic as it is not clear otherwise.

OCTA Comments on Draft California Transportation Plan 2050

- Public Transportation, Page 44: Our Transit and Rail Systems. Sparse land use that makes it difficult to provide efficient transit service is not limited to exurban and rural communities – it is also an issue for many areas within urban counties.
- Active Transportation, Page 47: Figure 17. Consider a different graphic rather than the map, which better illustrates the current state of active transportation. The map reflects on a very small aspect of active transportation and fails to acknowledge the statewide coverage of other shared micromobility.
- Active Transportation, Page 49: Our Active Transportation System. Personal safety can remain a significant concern even in locations with access to sidewalks and bike lanes. The speed differential between motor vehicles and active transportation users can be a determent to more active transportation use.
- Goods Movement, Pages 53-58. Consider addressing the relationship between goods movement and land use – particularly warehousing space and manufacturing space – as that also has significant impact on California communities.
- Over Travel Patterns, Page 61: By 2050. It seems important to caveat the MPO growth forecasts as they can be considerably older that the DOF numbers. It may be important to note the expected increase in VMT per capita in the Northern California region and Sierra compared to the rest of the state when developing recommendations for the CTP.
- Goals and Objectives, Page 68: Climate Performance Measures. Consider refining or augmenting the GHG emissions from transportation sector to more closely align with the SB 391 requirement such as indicating the percent difference from 1990 levels. Clarify how carbon capture and sequestration are addressed in the CTP. Consider restructuring the number of system improvements addressing climate vulnerability to a potentially more meaningful measure of the degree of know transportation system climate vulnerability not addressed or significantly at risk.
- Goals and Objectives, Pages 68-69: Equity Performance Measures. Clarify what destinations access will be measured to and how access will be measured. Consider evaluating the comparative benefits by income quintile and race for travel time and travel distance for work and non-work trips. Consider expanding the performance measures to evaluate the potential impacts of roadway pricing by income quintile and race. Consider adding access to destination by mode and by travel cost by income quintile and race.
- Goals and Objectives, Page 69: Accessibility Performance Measures. Clarify what destinations access will be measured to and how access will be measured. Consider expanding the households with access to transit service to include a breakdown of households by income quintile and race.
- Goals and Objectives, Page 70: Quality of Life & Public Health. Consider removing “as the COVID-19 pandemic has shown, this also means making sure that transit and shared modes can be accessed with minimal risk of infectious disease transmission” as it is already covered under “minimize safety risks”. Additionally, this sentence raises several questions such as: who decides; how it this enforced; which guidelines or regulations take precedence; how is physical distance on transit or shared modes decided?

OCTA Comments on Draft California Transportation Plan 2050

- Goals and Objectives, Page 71: Environment. Clarify how the differences between protected open space, natural habitat, and agricultural uses. Consider restructuring the number of fish passages mediated to a potentially more meaningful measure of the degree to which fish passages remain unmediated.
- Goals and Objectives, Pages 71-72: Economy. Consider refining the annual employment growth to reflect new jobs supported by improved economic competitiveness (indirect) and new jobs supported by transportation system investments (direct).
- Goals and Objectives, Page 73: Infrastructure. Consider restructuring culvert rehabilitated to reflect the degree of culverts needing to be rehabilitated. Clarify repurposed lane-miles. Consider shifting the bicycle safety analysis to the Safety goal.
- Making Progress, Pages 80-82: Figures 32-34. Specify all of the component assumptions of each scenario. The description here is not consistent with the Technical Analysis Element so it is unclear if new assumptions were introduced. For example, excluding the lowest income quintile from increased AOC appears to be a new assumption.
- Making Progress, Page 85: Scenario Analysis Results. See comments on Technical Analysis Element. For example, telework strategies may conflict with land use strategies, but this does not appear to be considered.
- Making Progress, Page 87: GHG Emissions Reduction. What impact will Executive Order N-79-20 have in meeting the target? Will inclusion of the EO allow for future growth more in line with the MPO forecasts, or will the state need to pursue additional growth management strategies to limit growth to meet the 2050 targets?
- Making Progress, Page 92: Economic Benefits. What are the economic analysis results associated with the full Combined Scenario with lower future growth and expanded ZEVs necessary to meet the GHG emission reduction target?
- Making Progress, Page 93: Development Recommendations. Although strategies may not be quantitatively evaluated, a qualitative assessment can be conducted to determine if strategies centered on social equity, public health, and quality of life would substantial improve the likelihood of the state achieving the GHG emission reductions target.
- Our Path Forward, Page 97: Reaching Our Climate Targets. The reference to SB 391 is missing the critical component of feasibility. Without feasibility, SB 150 Reports will likely continue to show that the state is not on progress to meeting emission reduction targets.
- Our Path Forward, Page 98: Figure 48. Clarify the component assumptions included in this figure as it is unclear from the language provided.
- Our Path Forward, Pages 109-110: Price Roadways to Improve the Efficiency of Auto Travel. A clear distinction between Recommendations 10 and 14 is needed. Where Recommendation 14 is focused on a replacement for current transportation funding mechanisms like the gas tax, Recommendation 10 is focused on influencing behavior. The inclusion of a means-based fee structure ignores that fact that every low-income drivers can significantly contribute to congestion, VMT, and GHG emissions.

Any congestion pricing program should reflect the actual congestion costs and associated externalities associated with each user of the system. A means-based approach would not treat all users fairly. Equity concerns should be addressed in how net congestion pricing revenues are invested (whether for alternatives to driving or for tax deductions), not in how they are collected. Limiting congestion pricing to only the largest MPO areas (with the addition of cordon pricing in select downtowns) will likely incentive sprawl for both business and households, especially as telework makes job location less important for higher wage earners, and reduces the economic competitiveness of these regional that are the core of California's economy. This section also does not address if the net revenues from congestion pricing are targeted for expenditure in the region it was generated. This approach also ignores that congestion, VMT, and GHG emissions are not limited to urban areas of the state and that significant areas within these MPO areas are not well served by transit or other alternatives to driving. For example, according to SCAG data, slightly more than two percent of the SCAG region lies within High-Quality Transit Areas—suggesting most residents of the regional would not likely have sufficient access to transit to avoid the increased VMT fees. Clarify how the legislation would be enacted. Clarify how much should be invested in "viable alternatives to driving?" Clarify if the recommendation and/or legislation would require investments be project-specific (like SB 127) or program-wide? Which agencies would be responsible for delivering pricing-based improvements? Explain why those unable to operate a vehicle would be subject to paying roadway pricing fees.

- Our Path Forward, Page 111: Encourage Efficient Land Use. Clarify limitations of using "existing funding programs, such as greenhouse gas reduction funds (GGRF) and SB1 funds, to elevate projects that support efficient land use and development patterns" including maintaining core tenants of the funding programs and that both of the listed sources are generally considered to have expired or have significantly reduced revenues by 2050.
- Our Path Forward, Page 113: Strategically Invest in State of Good Repair Improvements. Clarify the action "align funding for state of good repair and state highway operations projects with VMT-reduction projects such as tolling and express lanes". For example, will future SHOPP funding be prioritize for toll roads and SHS facilities with HOT lanes?
- Our Path Forward, Page 114: Seek Sustainable, Long-Term Transportation Funding Mechanisms. Revise "implement a statewide means-based road-user charge program as a replacement for the gas tax, based in the findings of the road-user charge study" to "develop a statewide road-user charge program as a replacement for the gas tax". The eventual road-user charge program should not be limited to the finding of the road-user charge study as several outstanding issues remained at the conclusion of the study. Additionally, the road-user charge should reflect the actual cost associated with each user to operate and maintain the transportation system. A means-based approach would not treat all users fairly. Equity concerns should be addressed in how transportation revenues are invested, not in how they are collected.
- Our Path Forward, Page 115: Implementation. A central theme of the Implementation Element should be feasibility. The Implementation Element should also be conducted

within twelve months of finalizing the CTP 2050 to ensure the information can inform the Strategic Growth Council report required per AB 285. The Implement Element/feasibility analysis should also be developed in "cooperative process involving local and regional government, transit operators, congestion management agencies, and the goods movement industry" consistent with Government Code Section 65070(a).

Technical Analysis Element

- Socioeconomic Forecasts, Page 11. Clarify which RTP/SCS is being used for each MPO. Explain how MPO RTP/SCS population and employment forecasts were adjusted to CTP 2050 horizon years. The latest adopted RTP/SCS for the SCAG region at the time of the CTP development was the 2016 RTP/SCS, which had a horizon year of 2040 and most of the growth forecasts are over five years old.
- 2050 Baseline Scenario, Page 17. Clarify what was included from MPO RTP/SCSs in the Baseline Scenario. For example, SCAG's 2016 RTP/SCS included an assumed VMT fee of $0.028 per mile. Was this included?
- Sensitivity Testing, Page 23: Local Transit. Clarify how the transit assumptions were modeled? For example, was a 30-minute headway reduced to a 15-minute headway for doubling local transit service? How were speeds increased by 50 percent? Did this assume bus only lanes, which in many cases would have needed to entail converting a mixed flow arterial to bus only? How were free fares modeled? Clarify how "free" transit will be paid for?
- Sensitivity Testing, Page 24: Intercity Rail and High-Speed Rail? Where were the "several significant new rail lines added throughout the state" located? What alignment was assumed for the extension of HSR from Anaheim to San Diego?
- Sensitivity Testing, Page 25: Managed Lanes. In what model year was the minimum HOV occupancies raised to 3+? What assumptions were made for existing and planned express/HOT lanes included in MPO RTP/SCSs?
- Sensitivity Testing, Page 25: Freight and Goods Movement. Clarify where the truck only lanes were assumed to operate and if the lanes were new capacity or conversion of mixed flow lanes to truck only lanes.
- Sensitivity Testing, Page 26: Road User Charge. Provide additional explanation of assumptions behind the 50 to 100 percent. Even the low range appears to be significantly higher than was used in both the 2016 and 2020 SCAG RTP/SCS that included an AOC increase in the 25 to 30 percent range while also including the introduction of VMT fees. Given the presumed larger fleet share of ZEVs with lower AOC than MPOs are allowed to use for SB 375 purposes, the assumed AOC increase is significantly more than maintaining purchasing power with current fuel taxes at both the state and federal levels. Provide documentation of differential access to alternative modes between urban and rural travelers consistent the urban vs. rural counties split.

According to SCAG data, slightly more than two percent of the SCAG region lies within High-Quality Transit Areas—suggesting most residents of the regional would not likely have sufficient access to transit to avoid the increased VMT fees. What assumption was used for AOC for rural counties?

- Sensitivity Testing, Page 26: Cordon Pricing. Clarify the basis of the $10 cordon price—is it in 2020 dollars or 2050 dollars? Explain how the cordon pricing would work. Would the $10 charge be assessed for each crossing of the boundary; was there a maximum per day; any discounts for residents or for lower-income resident/workers? What geographies are included in the cordon areas? Does it include the SHS?
- Round 1 Modeling, Page 29: Figure 7. Specify all of the component assumptions of each scenario. For example, it is unclear if fare free transit is included in Scenario A.
- Round 2 Modeling, Page 36: Figure 8. Specify all of the component assumptions of each scenario. For example, what assumptions were made for local transit and pricing?
- Round 2 Modeling, Page 37: Modeling Land Use. Explain how the reallocation of growth between 2015 and 2050 accounted for actual development activity between 2015 and 2020 and entitled development projects.
- Round 2 Modeling, Page 44: Figure 11. The additional assumption of telework seems like it would likely reduce the benefits accrued to Land Use (and perhaps others like Rail Plan and Transit), as access to work and commute costs would have less influence on residential location. How was this accounted for in the analysis and assumptions?
- Round 2 Modeling, Page 50: Emissions – Reaching 2050 Targets. What impact will Executive Order N-79-20 have in meeting the target? Will inclusion of the EO allow for future growth more in line with the MPO forecasts, or will the state need to pursue additional growth management strategies to limit growth to meet the 2050 targets?
- Round 2 Modeling, Page 52: Key Takeaways. The need to reduce future growth is not listed in the summary points but was critical for meeting the 2050 targets are noted in Figure 13. Additional language addressing the feasibility of the “bold, transformative strategies” is also missing.
- Economic Forecasts and Analysis, Page 54: Methodology. Clarify if adjustments to housing costs were included in the modeling assumptions to reflect increased costs with reallocation of households from lower cost, lower density locations to higher cost, higher density locations and the associated need for additional subsidies to support affordable housing and anti-gentrification/displacement efforts. Which population forecast was used for this analysis? Describe how all assumptions used to the meet the 2050 target via the travel demand model were incorporated into the economic analysis. Was the telework assumption included in the economic forecast?
- Economic Forecasts and Analysis, Page 60: Fees Generated and Re-spent. The locations for imposition of cordon pricing is different than listed earlier. Is this intentional? What was modeled? The imposition of road user fees is listed only for the SCAG, MTC, SACOG, and SANDAG MPO areas. Is the same assumption in the travel demand modeling? Describe the analysis conducted to support the assertation that these MPO areas have sufficient transit coverage to mitigate the impact of the VMT fee.

Is the economic analysis sensitive to the additional AOC costs in theses selected urban area such that it would incentivize other parts of the state due to lower costs? It appears that travel demand model runs were conducted for 2015, 2020, 2030, 2040, and 2050 but only 2050 results were reported. Why not other years for economic impacts, especially for 2030 and 2040 after imposition of the additional fees? Describe the allocation approach for net revenues from cordon pricing and road user fees. Where net revenues distributed across the state? Were any return-to-sources assumptions included? Describe how the use of net revenues from transportation users is allowable for non-transportation uses such as education, affordable housing, and heath care based on Article 19 of the California Constitution. Describe how revenues from cordon pricing and VMT fees were adjusted down to account for costs associated.

- Economic Forecasts and Analysis, Pages 63, 65, and 66: Figure 20, 22, and 23. Assuming that the economic analysis did not incorporate the increased costs associated with reallocation of households from lower cost, lower density locations to higher cost, higher density locations and the associated need for additional subsidies to support affordable housing and anti-gentrification/displacement efforts—if these costs were included, would the land use scenario continue to return positive results compared to the 2050 Baseline?
- Economic Forecasts and Analysis, Pages 78-82: Impact by Urban/Rural Setting and Equity. Consider updating the discussion to clarify that the SCAG, MTC, SACOG, and SANDAG MPO areas are assumed to subsidize investments in the rest of the state. This is illustrated in Figure 38, which shows rural areas outperforming urban areas across scenarios. Had the additional housing costs particularly in urban areas also been incorporated into the analysis, rural areas would likely have fared even better.
- Economic Forecasts and Analysis, Pages 82-83: Key Takeaways. As the economic analysis does not appear to actually consider the full breadth of strategies needed to achieve the GHG emission reductions target, it is unclear how the economy would be impacted. For example, telework assumptions, reduced population growth, and increased housing costs due to reallocation of future development activity do not appear to be considered.
- COVID-19 Analysis, Page 91: Key Takeaways: Consider expanding the “advancing social equity” item to include the need to examine how to ensure telework strategies are effective across income groups. Additional analysis would also be valuable to explore the impact of remote work strategies on home and business location choices, especially to consider relationship between other strategies like land use and pricing.

Financial Analysis Element

- Introduction, Page 1: Short to Medium-Term Impact of COVID-19. Transit cost also significantly increased due to the need to limit passenger loading on vehicles to support social distancing, including the need to dispatch additional vehicles of higher ridership lines. Whether former public transportation users return to transit is not simply an issue of trust or opting for more active modes. The research by UCLA and

SCAG on transit ridership declines in Southern California reflect the critical role of increased auto ownership in the decline in transit ridership. It is likely that this recently observed trend will also be applicable going forward.

- Introduction, Page 2: Magnitude of Funding Needs. The description of RTPs should be updated for accuracy. For example, RTPs must cover a 20+ year horizon and often plan for 25 years. RTPs also must include the cost to build, operate, and maintain the SHS regardless of funding source. In the case of the incorrectly listed SCAG 2020 RTP/SCS (which was adopted in September 2020 not April 2020), the $638.9 billion (in year of expenditure dollars) plan includes well over $100 billion in assumed expenses on the SHS. Additionally, the statement that the RTPs did not include expenses to retrofit infrastructure to handle additional electric vehicle or connected vehicles seems a likely overstatement as this is one of the limited areas MPOs may take credit for efforts that reduce GHG emissions under SB 375. The SCAG 2020 RTP/SCS includes over $8 billion (in year of expenditure dollars) just associated with electrification strategies. It is also worth noting why the SCAG 2020 RTP/SCS values were included for this section, whereas the SCAG 2016 RTP/SCS information was used in other parts of the CTP 2050.
- Introduction, Pages 5-6: Importance of Self-Help Funding in California. This section is an inaccurate representation of local option sales tax measures. For example, the statements, “With self-help funding, the sales tax revenues are retained by the county and spent primarily on projects of local benefit. This approach allows counties to fund projects that meet local mobility needs…” is incorrect as both Measure M1 and M2 in Orange County committed 43 percent of Orange County resident-funded sales tax revenues to the SHS. The “Move So Cal / Vision 2020/2022” should be removed as it lacks critical support.
- Introduction, Page 6: Role of Transit and Active Modes of Transportation in Reducing Congestions. This section should be revised to acknowledge that transit and active transportation provide alternatives to driving on congestion roadways but do not in themselves reduce congestion as any users switches to these modes would likely induce trips to fill any excess capacity.

Plan Development Element

- Footers and page number is not set up correctly. References to page numbers below reflect what is on the pdf.
- Regulatory Requirements, Pages 2-ii: State Regulations Addressing Climate Change. The final plan should include EO N-79-20.
- Regulatory Requirements, Pages 2: Checklist of Requirements for Statewide Planning. The section describing California Government Code Section 6502.2 is missing critical language, which is underlined here: “The department shall address in the California Transportation Plan how the state will achieve <u>maximum feasible</u> emissions reductions in order to attain a statewide reduction of greenhouse gas emission…”.

- Plan Consistency, Page ii: Regional Plans. Language should be added to indicate that the RTPs listed in Table 4 were the currently adopted plans during the development of the CTP 2050 as some of the information in the table is obsolete now.
- Outreach and Engagement, Page 28: Public Workshops. Describe how equivalent input that would have been received through public workshops will be sought prior to finalizing the CTP 2050.
- Oversight, Pages 15-14, Committee Membership. Language should be added to indicate that tables reflect organization representation at the time of the CTP 2050 development as a number of the members are no longer affiliated with listed organization.

Strategies Element

- Strategy Inputs, Page 5: Regional Transportation Plans and Sustainable Communities Strategies. Language should be added to indicate that the plans listed in Table 2 were the currently adopted plans during the development of the CTP 2050 as some of the information in the table is obsolete now.
- Strategy Inputs, Page 7: Describe how equivalent input that would have been received through public workshops will be sought prior to finalizing the CTP 2050.
- Strategy Inputs, Page 8: Other Statewide Plans. Clarify which listed strategies were screened for effectiveness at achieving CTP goals and for consideration in the Recommendations Element and which were removed from further consideration.
- Climate, Page 15: Promote the adoption of Zero-Emission Vehicles (ZEVs). Subsidies for clean and electric vehicle transportation should not be limited to rural areas just as poverty is not limited to rural areas.
- Equity, Page 20: Improve accessibility and economic vitality in underserved and disadvantage communities. Add “support” to the beginning of “safeguard against displacement by incorporating tenant protection policies, affordable housing production, and affordable housing preservation in the initial phases of transportation planning” as many transportation planning agencies have not authority over land use and/or housing.
- Equity, Page 21: Improve environmental and public health in disadvantage communities. Remove “rural” as other urban areas may also have needs that are not well addressed by population-based allocation – “Develop a needs-based funding mechanism (rather than population-based) to better-assist ~~rural~~ areas that struggle to obtain funding for critical infrastructure projects”
- Accessibility, Page 24: Incentivize more accessible land use. The item “use road pricing revenues to fund affordable housing and non-auto modes” fails to account for unclear authority to use transportation-generated revenues for non-transportation uses and for road pricing in general. Significant additional research is needed to explore road pricing. This item should be revised to “explore use of road pricing revenues to support non-auto modes and affordable housing” and moved under the “expand research on changing travel behavior and preferences” section.

- Accessibility, Page 27: Improve active transportation travel options. Revise “require a portion of pricing revenues to be invested in transit and active transportation” to “support dedication of a portion of net pricing revenues to be invested in transit and active transportation”.
- Accessibility, Page 28: Provide integrated and seamless travel connections. Revise “implement a statewide integrated fare payment system” to “evaluate a statewide integrated fare payment system” consider other proposals to eliminate fares and potentially incurring significant costs for no gain.
- Accessibility, Page 28: Provide integrated and seamless travel connections. Remove “develop a state-owned single platform to access all mobility options” as it would be addressed by the revision to the item above. Experience with HOT lanes and the RUC program suggest a single platform is not the best approach.
- Accessibility, Page 30: Adapt the system to evolving mobility needs. Add caveats to “raise minimum vehicle occupancy in HOV lanes to 3+” to recognize that changing the occupancy without also converting the lane to HOT may result in significantly underutilized managed lanes and increased delays in adjacent mixed flow lanes with unclear GHG impacts.
- Accessibility, Page 31: Pursue pricing strategies. Remove “with protections for rural and disadvantaged communities from “explore a mileage-based user fee…” as the exploration may yield other provisions that are more critical. If the mileage-based user fee is intended to be a replacement to existing fuel tax-based transportation revenue systems, all users should be paying their fair share. Equity considerations are more appropriately addressed under “explore congestion pricing…” but should not be limited to urban areas as congestion occurs in rural areas too (especially resort communities). Explain why those unable to operate a vehicle would be subject to paying roadway pricing fees.
- Quality of Life & Public Health, Page 33: Expand access to active transportation. Revise “direct investments in active transportation infrastructure toward disadvantaged communities and vulnerable populations, including those in isolated rural communities” to “expand investments in active….” to allow for a comprehensive, needs-based allocation of active transportation investments.
- Quality of Life & Public Health, Page 33: Reduce household transportation costs. Revise “make “last-mile” services free (subsidize rides to/from transit)” to “investigate ways to make…” as it may not be feasible or appropriate to subsidize all last-mile services.
- Quality of Life & Public Health, Page 35: Support enjoyable trip experience and vibrant public spaces. Revise “transform aging malls and office parks into mixed-use, transportation-efficient neighborhoods” to “support the transformation of aging malls and office parks…” to reflect that most public agencies do not actually own malls and office parks nor build neighborhoods.
- Environment, Page 37: Advance environmental justice. Revise “direct investments to communities most impacted by air and water pollution (AB 617)” to encourage investments that would likely improve local air and water pollution conditions.

- Environment, Page 37: Promote environmentally sensitive land use. Revise “Develop urban growth boundaries. Create priority development and conservation areas at the statewide level…” to “Support urban growth boundaries that prioritize development and conservation areas at the county, regional, and statewide levels…”. Since land use is controlled primarily at the local level, decisions about where growth should occur should not be limited to a state authority with no local accountability.
- Infrastructure, Page 48: Explore new dedicated funding opportunities. Revise “implement a statewide means-based road-user charge program as a replacement for the gas tax, based in the findings of the road-user charge study” to “develop a statewide road-user charge program as a replacement for the gas tax”. The eventual road-user charge program should not be limited to the finding of the road-user charge study as several outstanding issues remained at the conclusion of the study. Additionally, the road-user charge should reflect the actual cost associated with each user to operate and maintain the transportation system. A means-based approach would not treat all users fairly. Equity concerns should be addressed in how transportation revenues are invested, not in how they are collected.
- Infrastructure, Page 48: Explore new dedicated funding opportunities. Revise “direct pricing revenues to fund projects that improve access to high-quality, safe, and affordable mobility options for disadvantaged communities” to “direct pricing revenues to fund projects that improve access to high-quality, safe, and affordable mobility options, particularly for disadvantaged communities” as the negative impacts of pricing is not limited to disadvantage communities.