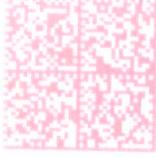




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Mr. Gabriel Corley
CTP Project Manager
Division of Planning, MS-32
California Department of Transportation
P.O. Box 942874
SACRAMENTO, CA 94274-0001

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April 10, 2015

Mr. Gabriel Corley
CTP Project Manager
Division of Planning, MS-32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001

Subject: California Transportation Plan (CTP 2040)

Dear Mr. Corley:

The Automobile Club of Southern California, with over 6 million members in the 13 Southern California counties, appreciates the opportunity to review and provide comments on the draft CTP 2040. The draft CTP 2040 is a good source of information on the separate “modal” plans that Caltrans produces and the status of the overall state transportation system. The sections on demographic trends, financial constraints, and greenhouse gas (GHG) emissions highlight the issues and challenges facing California as the state attempts to address the travel demands of a growing population.

Prior CTPs focused on goods movement and interregional connectivity issues. This draft plan is much more focused on GHG emissions and policies and strategies related to multimodal (non-automotive) travel and active transportation (bicycling and walking). We support improvements to, and better integration of, all modes of travel to enhance the overall transportation system and to improve the travel experience and safety of our members and all Californians.

The draft plan clearly focuses on a “fix it first” strategy, stressing the importance of using available resources to maintain and rehabilitate the existing state highway system. The Auto Club supports repairing damaged roads, replacing deficient bridges, and adequately maintaining the state’s highways. This, along with safety improvements, should be top priorities.

However, we are concerned that the plan’s “fix it first” strategy is effectively a “fix it only” strategy for the state’s highways. With the possible exception of freight-related projects, the plan clearly steers away from any added highway capacity. Highway improvement projects – including the addition of capacity in some places – are needed in addition to improving transit and active transportation to meet the travel needs of the 10 million additional people that are expected to live in California by 2040. In fact, many regional transportation plans and county transportation sales tax measures approved by voters include these needed highway improvements.

Strategic highway improvement projects are needed to serve the mobility needs of a population that is expected to increase by 26% over the next 25 years. The language in the plan should be modified to allow for cost-effective highway expansion projects supported and approved by local

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and regional transportation agencies to help reduce congestion and improve safety. Reducing congestion will also reduce fuel use, vehicle emissions, and GHG.

One of the main focus areas of the plan is an attempt to reduce GHG emissions by reducing vehicle miles traveled (VMT) and charging motorists more to pay for improvements to alternative modes. In the analysis of three alternative scenarios (Chapter 7), GHG goals are not achieved despite extremely ambitious assumptions regarding increasing the cost of driving, increasing bicycle and pedestrian facilities, and a dramatic expansion of transit services.

The analysis shows that a more effective approach to reducing GHG emissions is through increasing fuel efficiency and alternative fuel vehicles. This approach is how air quality was dramatically improved over the last several decades – not by shifting significant numbers of people into alternative modes and reducing auto travel, but by making major technological improvements to vehicle engines and fuels. As vehicles become cleaner over time, the relationship between reducing VMT and reducing GHG will become weaker. The plan should reflect this approach and not focus on reducing VMT and increasing motorist taxes in an attempt to reduce GHG.

The Auto Club supports and undertakes efforts to reduce the emissions and other environmental impacts of vehicle use. For example, our Automotive Research Center (ARC) is a state-of-the-art facility that publishes the annual AAA Green Car Guide, conducts electric vehicle tests and safety research, and developed groundbreaking new mileage testing procedures adopted by the U.S. Environmental Protection Agency that resulted in more accurate fuel economy information for consumers.

Finally, we are concerned about strategies to increase charges on motorists to substantially fund other programs and services. Motorist taxes, fees, and tolls must fairly represent their use of the system. Motorists should benefit if they are asked to pay more or in new ways. And all transportation system users and beneficiaries (including commercial trucks, transit riders, and landowners) should bear a proportionate share of financing the system.

Thank you for the opportunity to provide comments on CTP 2040. We believe our suggestions will improve the plan and more effectively achieve the goals of enhancing mobility, safety, and the environment in ways that are fair and achievable.

Sincerely,



Craig Scott
Principal Transportation Policy Specialist