

DEPARTMENT OF TRANSPORTATION**DISTRICT 4****OFFICE OF TRANSIT AND COMMUNITY PLANNING**

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

PHONE (510) 286-5900

FAX (510) 286-5559

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life*

May 31, 2017

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BAG055

Mr. Adam Noelting
Metropolitan Transportation Commission
375 Beale Street, Suite 800
San Francisco, CA 94105

Dear Mr. Noelting:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Plan Bay Area 2040 RTP/SCS. Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the Draft Environmental Impact Report (DEIR) dated April 2017, followed by comments on the Plan Bay Area (PBA) 2040 Draft Plan. To reference our comments on the DEIR Notice of Preparation please refer to our June 15, 2016 comment letter.

DEIR***Executive Summary***

Based on the MTC *Goods Movement Land Use Study*, we suggest to add the following bullet under the Areas of Controversy section (Page ES-10): "Shortages in industrial land result in outward dispersion of industrial activities and related employment." Reductions in industrial land may result in increased truck vehicle miles traveled (VMT), trip shifts, pressure for longer truck routes, additional trucks on the highways and local streets, increased emissions, wear and tear on the surface transportation system, higher overall transportation costs, and job displacement outside the Northern California Mega Region.

The passage of Senate Bill (SB) 1 and any resulting changes to the regional revenue estimate should be addressed in the Project Overview (ES-6).

Climate Change and Greenhouse Gases

Caltrans is concerned that implementation of PBA 2040 "could substantially conflict with the SB

32 goal of reducing Greenhouse Gas emissions to 40 percent below 1990 levels by 2030.” (Impact 2.5-3). We urge MTC to explore all available mitigation strategies and look forward to continuing efforts with your agency and other regional stakeholders in the advancement of climate resiliency strategies and corridor planning efforts, especially in light of the new requirements outlined within SB 1 and the Congested Corridors Program (Mitigation Measure 2.1-3-3[a]).

Pedestrian and Bicycle Infrastructure

Plan Bay Area 2040 sets the target of increasing non-auto mode shares by 10 percent. Although PBA 2040 outlines how transit infrastructure and service will be improved, it lacks a strategy for increasing pedestrian and bicycle mode share. We encourage MTC to develop a comprehensive active transportation plan as a future action item; PBA 2040 should allocate funding for the development of a regionally connected active transportation network. Such a plan, led by MTC, can support network continuity across jurisdictional boundaries. The Regional Bicycle Plan for the San Francisco Bay Area was last updated by MTC in 2009. Caltrans District 4 is currently developing a bicycle plan for the Bay Area district, but this plan will be limited to the STN.

Sea Level Rise

Plan Bay Area 2040 could result in a net increase in transportation projects within areas vulnerable to sea level rise by midcentury. While we agree that more work is needed to identify vulnerabilities and risks to the transportation system, and look forward to continuing our partnerships with MTC and the Bay Conservation and Development Commission in developing those assessments, more needs to be done to mitigate against these impacts to ensure that any new transportation project, especially those with design lives of 50 to 75 years and longer, are resilient to increasing sea level rise and other climate change impacts (Impact 2.5-5).

Highway Operations

The RTP/SCS should clarify that lead agencies should consult with Caltrans on whether a safety analysis is needed for specific local land use projects. Potential safety concerns are not exempt from analysis under the California Environmental Quality Act.

System Planning

With the enactment of SB 743 and to meet our Strategic Management Plan Targets, Caltrans is focusing on transportation infrastructure that supports smart growth and efficient development. In order to maximize efficiency in the transportation network, Caltrans supports efforts by the Association of Bay Area Governments (ABAG) and MTC focused on dense, walkable and transit-oriented neighborhoods rather than sprawl pattern development when addressing the region's housing needs. We look forward to continuing efforts with MTC and other regional stakeholders in the advancement of corridor planning efforts, especially in light of the new requirements outlined within SB 1 and the Congested Corridors Program (Mitigation Measure 2.1-3-3[a]).

Please note, the I-80 ICM is already operational, not “Planned” (Proposed Expansion to Transportation System Capacity, Page 2.1-22).

Please specify which agency operates each high-occupancy toll lane segment not planned to be operated by MTC (Proposed Expansion to Transportation System Capacity, Page 2.1-24).

Goods Movement

Please add State Routes (SR) 13 (ALA) and 84 (SM, ALA, SOL) to the listing of Major Limited-Access Highways in the Bay Area as both of these facilities feature significant limited-access segments (Table 2.1-1, Page 2.1-2).

I-580 does not terminate in Tracy. The route terminates closer to the San Joaquin/Stanislaus county line to the south in unincorporated San Joaquin County (Table 2.1-1 Major Limited-Access Highways in the Bay Area, Page 2.1-2).

SR 160 does not actually go through Solano County. It crosses from Contra Costa County into Sacramento County at the Antioch Bridge and continues northward on the Sacramento County side of the Sacramento River (Table 2.1-1 Major Limited-Access Highways in the Bay Area, Page 2.1-2).

The sentence, "These seaports are supported by freight railroad services operated by Union Pacific and Burlington Northern Santa Fe" should be revised to, "*These seaports are supported by Class I freight rail services and intermodal yards operated by the Union Pacific Railroad and the BNSF Railway.*" This revision aligns with current corporation titles (Seaports and Airports, Page 2.1-6).

Similarly, Caltrans suggests rephrasing the sentence, "The regional goods movement infrastructure includes... major rail lines and terminals operated by Union Pacific and Burlington Northern Santa Fe Railway, and highways that carry high volumes of trucks (MTC 2016c)" to "*...major rail lines and terminals operated by Union Pacific Railroad and BNSF Railway, and trade corridors that carry high volumes of trucks (MTC 2016c)*" (Page 2.1-6, Goods Movement).

Minor edits

- Page 1.2-3, Regional Location and General Setting: South Bay, Santa Clara County: The 1,782,000 county population seems low given the 1.8 million figure from the 2014 US Census. Please verify population numbers for all cities and counties.
- Page 2.1-2, Table 2.1-1: *Major Limited Access Highways in the Bay Area*. Add SR 84 to the table.
- Page 2.1-6, Figure 2.1-3: *Bicycle Facilities*: The map seems to show the Posey Tube between Alameda and Oakland as a bicycle trail, but it is actually a pedestrian trail, and bicyclists may walk their bikes here. Please revise accordingly.
- Page 2.1-10, *Mode Share and Daily Trips*: Text states, "Napa County residents have the longest average one-way commute distance (18.2 miles)" yet Table 2.1-6 shows Solano commute distance as 20.2 miles; please resolve this discrepancy.
- Page 2.1-11 & 12: Table 2.1-7 shows 2015 Bike share at 4%, while Table 2.1-8 shows 2015 Bike Share of 2%; please resolve.
- Page 2.1-26, Table 2.1-15 *Typical Weekday Daily Person Trips*: Please verify the number of bicycle trips. The numbers and percentage seem low considering the increase in bicycling to work reported early in the document as well as various plans and efforts to promote bicycle travel at State, regional and local levels.
- Page 2.3-4: "*Of these approximately 2.3 million acres of agricultural land, over 70*

percent...are used for grazing. Field crops...represent approximately 62 percent of Bay Area agricultural land..." One of these figures appears to be wrong (grazing 70% + field crops 62% = 132%).

PBA 2040

General

Caltrans appreciates MTC's analysis of State Highway Needs in the *Draft Local Streets and Roads, Bridges, and State Highway Needs Assessment* supplemental report of the draft RTP and we look forward to collaborating with MTC to address these needs.

Caltrans recognizes that PBA 2040 is a limited and focused update, however an evaluation of the previous PBA approach and its contribution to the current housing crisis would help identify needed modifications in the current PBA 2040 to address housing needs (Page 25).

Please discuss the California Transportation Plan 2040 (CTP 2040), specifically how PBA 2040 is consistent with the CTP 2040's goals and policies, and how local, regional and State governments can work together to achieve state-wide performance targets (Page 26).

Please clarify what the two congestion pricing projects in San Francisco are that are mentioned on Page 49.

Aeronautics

Plan Bay Area 2040 does not mention anything about airport planning or airport access, despite the requirement in Government Code, Section 65081.1, where it states: "*Regions that contain a primary air carrier airport (defined by the Federal Aviation Administration as an airport having at least 10,000 annual scheduled passenger boardings) shall work collaboratively to include an airport ground access improvement program with the RTP. This program shall address airport access improvements projects, including major arterial and highway widening and extension project, with special consideration given to mass transit.*"

Airports are missing from all maps in the document and the planned improvements on page 50. Are there any planned improvements around the region's airports? Could airport projects be identified as ground access improvements?

Plan Bay Area 2040 excludes any mention of airport land use compatibility considerations within the airport influence area, which is defined as a two-mile radius around an airport, or is designated by local land use agencies. Such planning is needed to protect both on- and off- airport uses, and is addressed in various sections of the Public Utilities, Government, Education, Public Resources, and Business, and Professions Codes.

While the action plan section mentions the region's vulnerability to natural disasters, the contribution airports provide to disaster recovery and regional resilience is omitted (Chapter 5, Page 70-77). ABAG's *2014 Cascading Failures Study* provided an in-depth look at the region's airport capabilities and vulnerabilities; please include mention of their value in this section. The

study is available online at: http://resilience.abag.ca.gov/projects/transportation_utilities_2014/.

The discussion on climate adaptation does not mention any of the regions six airports that are vulnerable to sea level rise (SLR). The airports are: San Francisco and Oakland International Airports, Rio Vista Municipal, Hayward Executive, Gness Field, and Moffett Federal Airfield, and should be referenced (Chapter 5, Page 78).

Travis Air Force Base is a major military installation for both incoming and outgoing troop and military cargo movements; the PBA 2040 does not include any mention or discussion of this important west coast military gateway. A brief mention of this Department of Defense installation, and its needs should be summarized.

RTP Checklist

Consultation/Cooperation

The *Public Engagement Report* should summarize the Port of Oakland, major airports, and the goods movement industry's (i.e., trucking and rail) involvement in the development of the draft RTP and also reference the *Freight Emissions Reduction Action Plan*.

Programming/Operations

The RTP Checklist refers to the *Investment Strategy Report* (Page 3) for a discussion of the federal Congestion Management Process required pursuant to Title 23 Code of Federal Regulations (CFR) Part 450.320. The report provides a brief description of the State's voluntary Congestion Management Program; however, the State's Congestion Management Program differs from the federal Congestion Management Process. Please clarify whether the federal requirement is satisfied.

Environmental

The RTP Checklist refers to the Environmental Impact Report (Pages ES-11 to 49) for a discussion of potential mitigation activities. As specified in Title 23 CFR Part 322(f)(7), the RTP shall include: "*A discussion of types of potential environmental mitigation activities and potential areas to carry out these activities. . . The discussion may focus on policies, programs, or strategies, rather than at the project level. The discussion shall be developed in consultation with Federal, State, and Tribal land management, wildlife, and regulatory agencies.*" Please summarize potential mitigation activities to satisfy this federal requirement.

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Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jean Finney, Deputy District Director, Transportation Planning and Local Assistance, at (510) 286-6196 or jean.finney@dot.ca.gov.

Sincerely,



BIJAN SARTIPI
District Director

c: State Clearinghouse
 Mr. Art Dao, ACTC
 Mr. Randell Iwasaki, CCTA
 Ms. Dianne Steinhauser, TAM
 Ms. Kate Miller, NCTPA
 Ms. Tilly Chang, SFCTA
 Ms. Sandy Wong, C/CAG
 Ms. Nuria Fernandez, SCVTA
 Mr. Daryl Halls, STA
 Ms. Suzanne Smith, SCTA