

DEPARTMENT OF TRANSPORTATION

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Making Conservation
a California Way of Life.

10/28/2020

October 27, 2020

Governor's Office of Planning & Research

Oct 27 2020**STATE CLEARINGHOUSE**

Adam Noelting, Principal Planner
Metropolitan Transportation Commission (MTC)
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 of the Plan Bay Area (PBA) 2050 Notice of Preparation (NOP). We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the September 2020 NOP.

Project Understanding

MTC and the Association of Bay Area Governments (ABAG) are the joint Lead Agencies preparing PBA 2050 which seeks to ensure that the Bay Area is affordable, connected, diverse, healthy and vibrant for all by the Year 2050. The Lead Agencies' regional growth forecasts project the total population to increase by 2.7 million and housing units to increase by 1.4 million by the Year 2050. As part of the Blueprint process, PBA 2050 also seeks to meet or exceed State and federally-mandated Greenhouse Gas (GHG) emission reduction targets.

Modeling and Analysis

When analyzing scenario/project alternatives and their potential impacts, please note the following:

- Please consult Caltrans regarding the analysis of capacity-increasing projects on the State Highway System (SHS) as well as proposed land use projects that may impact the SHS. Per SB 743, Vehicle Miles Traveled (VMT) is the primary metric to assess potential transportation impacts. Caltrans SB 743 implementation information is available at

<https://dot.ca.gov/programs/transportation-planning/office-of-smart-mobility-climate-change/sb-743>;

- Please ensure that metrics and performance measures that address VMT, passenger and freight congestion (particularly with the expansion of the Express Lane Network), and mode choice take into account clean air/electric vehicles (passenger and truck), automated vehicles, and Transportation Network Companies (TNCs);
- The PBA 2050 Environmental Impact Report (EIR) should acknowledge COVID-19 impacts, regarding the prioritization, funding, and construction schedule of transportation projects, as well as opportunities related to telework;
- The PBA 2050 EIR should acknowledge and take into account California Executive Order (EO) N-79-20 which mandates that 100 percent of in-State sales of new passenger cars and trucks are zero emission by 2035, and EO N-19-19 which requires the redoubling of the State's efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy.

Relationship with Statewide Planning

Caltrans strongly encourages the Lead Agencies attain consistency with the goals and objectives of State plans which include, but are not limited to, the following:

- The Draft California Transportation Plan 2050, which seeks to combat climate change and the risks it imposes to infrastructure and communities (Final to be released Winter 2021). <https://ctp2050.com/>;
- The California Active Transportation Plan, *Toward an Active California*, which seeks to strengthen and reconnect local networks, improve safety, and expand multimodal access. <https://www.catplan.org/district-4>;
- The Interregional Transportation Strategic Plan (ITSP), which provides guidance for the identification and prioritization of interregional transportation projects for the Interregional Transportation Improvement Program (ITIP). (The 2021 ITSP is currently under development which will update the 2015 ITSP). <https://dot.ca.gov/programs/transportation->

planning/multi-modal-system-planning/interregional-transportation-strategic-plan;

- The California State Rail Plan, which provides a framework for California's rail network. <https://dot.ca.gov/programs/rail-and-mass-transportation/california-state-rail-plan>;
- The California Freight Mobility Plan, which seeks to provide a long-term vision for California's freight future. <https://dot.ca.gov/programs/transportation-planning/freight-planning/ca-freight-advisory-committee/cfmp-2020>;
- Comprehensive Multimodal Corridor Plans developed in coordination with partners and stakeholders for multimodal long-range corridor planning. <https://dot.ca.gov/programs/transportation-planning/multi-modal-system-planning/system-planning/corridor-planning>.

Alignment with the California Integrated Travel Project (Cal-ITP)

Cal-ITP seeks to make travel simpler and cost-effective for all. As part of the \$10 million cost estimate to develop the strategy to reform the regional fare policy, please include a discussion on its alignment with the Cal-ITP principles and standards, including payment options, data standards, and equity. Information about Cal-ITP can be found at <https://dot.ca.gov/cal-itp>.

Equity

Caltrans is committed to advancing equity by directing support, resources and protections to disadvantaged communities, while ensuring that transportation-related GHG emissions are reduced to improve the quality of life for all. Caltrans commends the Lead Agencies' efforts to sustainably accommodate future growth by reducing per capita GHG emissions and providing adequate housing for all income levels. The PBA 2050 EIR should discuss criteria pollutant reductions (including Particulate Matter (PM) 2.5) particularly for disadvantaged communities.

VMT Banking and Exchange

PBA 2050 should include VMT banking and exchange as an opportunity to coordinate land use mitigation strategies on a regional level. The Lead Agencies should explore the structural and legal considerations to enact policies and procedures to enable the creation of banks and exchanges across local jurisdictions within the Bay Area.

Climate Change

The SHS provides critical accessibility and mobility to those living in and passing through the Bay Area. Caltrans is committed to understanding the potential impacts of climate change, particularly sea level rise, to create a more resilient transportation network. While Caltrans recognizes that PBA 2050 is financially constrained and the strategies have been fully vetted through the public/stakeholder engagement process, sea level rise adaptation strategies will require a more significant investment. The PBA 2050 EIR should fully address sea level rise impacts and their constraints.

Environmental Considerations

The State Highway System within the Bay Area overlaps numerous protected and sensitive natural resources, including large tracts of protected open space, recreational trails, habitat for threatened and endangered species. Caltrans continues to seek opportunities to incorporate environmental considerations into its transportation planning and scoping processes. Integrating design features that enhance fish passage and wildlife connectivity across the highway system and avoiding impacts to wetlands and open space provide an opportunity to better integrate California's transportation system into the environment. Improving wildlife and fish passage can contribute to the enhancement and recovery of imperiled species and reduce offsite mitigation requirements. The PBA 2050 EIR should address potential impacts of planned transportation projects and their impacts on fish and wildlife passage. The PBA should further discuss and identify programmatic mitigation opportunities that best address adverse environmental impacts on a corridor-wide basis.

Freight Planning

The PBA 2050 EIR should consider the extraordinary significance of interregional and interstate travel, especially the role of freight and commerce, when reflecting upon the core elements of PBA 2050. Based upon the unique geography of the Bay Area, which has allowed the region to become a domestic, interregional and international gateway for freight distribution, the PBA 2050 EIR should address how freight sustainability is a key factor in meeting established goals and strategies related to equity, environment and economy. The California Freight Mobility Plan provides important information in this regard.

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Tribal Coordination

Per Code of Federal Regulations, 23 CFR § 450.316, Part C, the Lead Agencies shall appropriately involve the federally-recognized Tribal Governments and Tribes not federally recognized and other “interested Parties” that may have background and interest in Native American culture in the region. In addition, as mandated by Assembly Bill (AB) 52, the Lead Agencies must consult with Tribes regarding impacts to Tribal cultural resources as an impact under CEQA.

Early Coordination

Caltrans suggests that PBA 2050 clearly state that partner agencies should ensure early coordination with Caltrans in the planning process for projects that would entail any ongoing access issues, including work within, over, under or adjacent to State right of way.

Caltrans appreciates the opportunity to comment on the NOP. We look forward to our continued partnership in the development of PBA 2050. Should you have any questions regarding this letter, please contact me at (510) 960-0868 or by e-mail sent to Mark.Leong@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Mark Leong". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

District Branch Chief
Local Development- Intergovernmental Review

cc: State Clearinghouse