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October 22, 2020

Mr. David Kim, Secretary
California State Transportation Agency
915 Capitol Mall, Suite 350 B
Sacramento, CA 95814

Attention: Deputy Secretary Darwin Moosavi

RE: Draft California Transportation Plan 2050

Dear Secretary Kim:

The Madera County Transportation Commission (MCTC) is providing comments on the Draft California Transportation Plan 2050 (CTP 2050). MCTC acknowledges and appreciates your efforts and the efforts of Governor Newsom's administration to work with us in crafting a strategy that reduces the negative impacts of greenhouse gas (GHG) emissions while respecting the challenges faced in the Madera Region. We also, like you, want to advance economic development in the San Joaquin Valley for the betterment of our communities and our residents.

MCTC continues to be a part of the effort in this State to reduce greenhouse gas emissions. We have adopted two rounds of Sustainable Community Strategies that demonstrate the ability to meet targets for GHG emission reductions set by the California Air Resources Board. MCTC also participates in programs designed to reduce not only harmful air pollutants, but greenhouse gas emissions. Public transit infrastructure, zero emission vehicles, work from home, and active transportation opportunities are just a part of our efforts to make a difference.

MCTC encourages the State to maximize the use of technology strategies to combat GHG emissions. California has been successful in its efforts to reduce air pollution emissions through this strategy and it should be used as a model for GHG emissions reductions. This would involve the encouragement of alternatives to the internal combustion engine, investments in infrastructure such as charging stations, autonomous vehicle enabling strategies, near and zero emission vehicles etc. The Governor's recent Executive Order is one that advances the argument for technological change in our approach to GHG emission reductions, and a thoughtful reexamination of the question of VMT reductions and its efficacy should be undertaken immediately.

Member Agencies: County of Madera, City of Madera, City of Chowchilla

MCTC will team with the State to manage VMT efforts to minimize the negative impacts on rural areas; areas that struggle economically compared to the State as a whole, and on populations that have historically struggled to share in the economic prosperity of California. VMT reduction cannot negatively impact areas attempting to grow jobs and increase the quality of life in the Madera Region.

Our long-range planning metrics need to recognize the diminishing value of VMT in light of a successful technology approach. We must realistically assess the marginal improvements in VMT to be gained through incremental land use changes.

MCTC requests the State to:

- ✓ Continue its emphasis on the widening of Highway 99 in the San Joaquin Valley to three lanes in each direction.
- ✓ Continue to promote highway improvements that expand the capacity to handle goods movement activity in the San Joaquin Valley such as truck lanes.
- ✓ Invest in roadway widening projects that improve the operation, safety, and management of traffic on heavily congested corridors to address long distance commutes, freight movement and rural agricultural travel needs.
- ✓ Invest in short haul rail lines and teaming that effort for enhanced passenger rail service.
- ✓ Invest in public transit services that enhance mobility and meet the social equity needs of our small town and rural populations.

Caltrans should provide clarification on how the CTP 2050 can be used in tandem with RTPs to achieve State goals. This includes a more detailed description of how the CTP 2050 is different from RTPs, including a list of all planning assumptions within the CTP 2050 that cannot be included in an RTP.

The CTP 2050 lacks a “fiscal constraint” analysis. In contrast, an RTP estimates each revenue source over the 20 year planning period. MCTC is in a non-attainment area and cannot add a strategy to its plan without identifying adequate funding to support it. The Federal Clean Air Act requires this kind of “conformity” to assure that the anticipated improvements in air quality will materialize.

The CTP 2050 is also not subject to environmental review under the California Environmental Quality Act (CEQA). RTPs are required to review alternatives and identify all adverse environmental impacts that require feasible mitigation measures.

We wish to conclude with an encouragement for an aggressive approach to technological solutions to address GHG reductions and to carefully and cautiously consider VMT management strategies. It is MCTC’s conclusion that a State investment strategy that eschews improvements such as widening and operational improvements will negatively impact the Madera Region.

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Please contact Patricia Taylor, Executive Director if you have any questions at patricia@maderactc.org or (559) 675-0721.

Sincerely,

Max Rodriguez, Chair
Madera County Transportation Commission