

Santa Clara County  
Roads Commission

Comments regarding the  
California Transportation Commission's  
2011 Statewide Transportation System Needs Assessment

Unanimously recommended by the Roads Commission on November 8, 2012

1. Page 1-3. It would be helpful for purposes of analysis to have the cost and revenue information shown in Table 1.1 broken-out by transportation mode and operation level (state/local).
2. Page 1-7. Ped/Bike Mode Share: increase in 5 regions, decrease in 2, no change in 10. (5 + 2 + 10 = 17; this appears to be an error, as only 14 MPOs were said to report on this measure.)
3. Page 1-8 to 1-10. Policy Recommendations should include congestion reduction (volume/capacity and delay time LOS) as the primary focus of future expenditures because it saves fuel, saves travel time, reduces air and heat pollution, fosters economic development, and improves quality of life. (See Page 2-15, below.) Congestion reduction (LOS improvement) is a *direct* measure of cost-effectiveness in transportation investment. It allows direct and fair comparison of the cost-effectiveness of transportation options. If congestion reduction was made our primary focus, transportation investment would more appropriately reflect user preferences and needs.
4. Page 1-8 to 1-10. Policy Recommendations should include consideration of rapid advances in vehicle fuel efficiency. VMT may be less important than a more meaningful and comprehensive measure like passenger miles per unit of energy (kWh or Btu) consumed. Even passenger miles per gallon would be a better metric than VMT. (See Page 7-8: "...*planning and implementation of measures that have the potential to reduce emissions and improve public health, such as new vehicle technologies, alternative fuels, clean transit vehicles...*")
5. Page 1-8 to 1-10. Cost reduction/control should receive greater and more immediate emphasis than revenue increases (new taxes), which are not currently supported by voters.
6. Page 2-15. Performance Analysis and Policy Recommendations and Performance Measures should give top priority to addressing the facts in this declarative statement: "*Traffic congestion is a serious challenge in all of our metropolitan areas... It is essential that resources are focused on reducing metropolitan traffic congestion, as well as maintaining and improving mobility between California's many regions. These efforts will support California's economy and the traveling public.*"
7. Pages 2-20 and 2-35. For purposes of analysis, this report should list daily (or annual) *linked* trips for each mode so direct comparisons can be made.
8. Page 3-2. As a growing share of funding has shifted to the local level, states should be allowed to test alternative revenue options and more flexibility should be supported for local operations.
9. Page 3-10, Table 3-1. Congestion reduction is not mentioned among performance goals listed for our State Highway System.
10. Page 3-18. Obtaining legislative relief for the cost of complying with National Pollutant Discharge Elimination System (NPDES) should be a Policy Recommendation. Funding for compliance with any/all existing or future federal regulatory mandate should be added by amendment to or be included in federal statutes. (Also see #22, below.)

11. Pages 3-22 to 3-28. Obtaining legislative relief should be a Policy Recommendation for these other unfunded Congressional mandates that burden our transportation programs: (Also see #22, below.)

- Intercity rail fleet compliance with federal safety and emissions requirements (pg 3-22, 3-23)
- Seaport compliance with federal environmental requirements (pg 3-26, 3-27, 3-28)

12. Pages 3-22, 3-23. A critical review of original manufacturer's recommended maintenance and replacement schedules should be conducted. Compliance with federal requirements should be funded by the feds. (Also see #22, below.)

13. Page 3-46. Interregional Road System: The Interregional Transportation Improvement Program (ITIP) lists 17 high priority projects in two tiers. None of these are in Santa Clara County. Hwy 152 is not mentioned (undoubtedly because MTC is silent about it). Policy Recommendations should give high priority to constructing a safe, grade separated freeway between Hwys 101 and I-5 in the busy Hwy 152 corridor; 152 should be an ITIP Tier 1 project. (Also see Page 7-6, below.)

14. Page 3-56. The sum of ten year costs for System Management and System Preservation are shown at \$195-billion; the amount allocated to each program should be shown.

15. Page 6-1. Although Caltrans' *Smart Mobility 2010* includes hours of delay, congestion reduction (per se) is not one of the seventeen "Smart Mobility Performance Measures".

16. Page 6-12. We agree that uniform statewide performance measures should be developed and required for standards of good repair.

17. Chapter 7. The nine Policy Recommendations reveal tension between roads and transit, and between urban and rural needs. Policy Recommendations should include resolution of competition for or conflicts over the same limited funds.

18. Page 7-3. The 2009 (not 1909) National Transportation Financing Commission report concludes that "commitment and vision" are needed. A detailed set of recommendations should be developed for potential transportation financing initiatives.

19. Page 7-3. Strengthening the national commitment to transportation state of good repair should emphasize the need for capital/operating/maintenance cost reduction efforts and P3 competitive contracting. To ensure cost-effectiveness, funding of transportation facilities must be apportioned according to their use by the traveling public.

20. Page 7-6. Hwy 152 must be included as a Tier 1 priority in the list of Interregional Transportation Improvement Program projects that "Improve mobility between California's regions and between California and neighboring states and countries". (Also see Page 3-46, above.)

21. Page 7-7. Among environmental review and permitting process reforms (Paragraph 7, *How to Get There From Here*), recommend legislation that will delegate to local agencies the authority to conduct National Environmental Policy Act (NEPA) certifications.

22. Page 7-9. Recommend legislative changes to the Unfunded Mandates Reform Act (UMRA, 1995) that will:

- A. Eliminate (or significantly lower) the cost threshold(s) defining unfunded federal mandates;
- B. Require full funding for compliance with existing federal mandates; and
- C. Impose a broad prohibition against future unfunded and/or underfunded federal mandates.

[End]