



August 21, 2026

Scott Sauer, Office Chief
Caltrans Division of Transportation Planning
1120 N Street
Sacramento, CA 95814

via email: CTP@dot.ca.gov

RE: Comments on Draft California Transportation Plan 2050 Pathways

Mr. Sauer:

The Coalition for Responsible Transportation Priorities (CRTP) has reviewed the draft California Transportation Plan 2050 Pathways (CTP). We appreciate the effort that went into developing this document and the opportunity to comment.

The Importance of Modal Rebalancing of Infrastructure

The state will not meet its climate, safety, and equity goals for transportation without making significant changes to the existing transportation system, particularly existing infrastructure. The draft CTP includes many good ideas, policies, and strategies for improving or adding low-carbon, safe transportation options, but largely fails to recognize the need to correspondingly transition away from the state's historic overreliance on traditional vehicular infrastructure. We believe that, for both financial and practical reasons, a commitment to maintaining existing vehicular infrastructure—even if other modal options are also more accommodated in the future—will ensure that the current transportation system remains in its current unsafe, unsustainable, inequitable, car-dependent state. A long-term modal rebalancing is required.

Therefore, we request that the CTP's "Infrastructure" goal and supporting policies and recommendations include the need to convert some existing vehicular infrastructure—such as general travel lanes and parking lanes—into dedicated bicycle, pedestrian, and transit facilities. In addition to helping achieve the mode shift necessary to meet the state's targets, conversion of existing facilities is generally much cheaper than building entirely new infrastructure.

Climate and Vehicle Miles Traveled (VMT)

The CTP's "Climate Action & Environment" goal, rather than simply "advancing" a climate-neutral transportation system, must include the aim of actually achieving a zero-carbon transportation system, in line with the state's policies and the urgency of the climate crisis. We further request changes to the draft CTP to address certain

inaccurate conclusions and misplaced priorities around strategies and performance metrics for reducing greenhouse gas (GHG) emissions and VMT, as follows.

Ineffective or Counterproductive Strategies and Performance Metrics

- The draft CTP calls for using “annual hours of peak-hour excessive delay per capita,” as well as two highway “reliability” metrics that are proxies for congestion, as Performance Measures for Accessibility (p.60). As the state discovered over decades of using vehicular delay as a transportation impact metric under CEQA, this approach is counterproductive. Because of the phenomenon of induced demand, attempts to relieve congestion/reduce vehicular delay inevitably result in more driving and more hours stuck in traffic.¹ The state itself has extensively documented many of the reasons not to use vehicular delay as a performance metric.² Furthermore, a focus on vehicular delay runs counter to the explicit aims of the Accessibility goal, including “Increase the competitiveness of transit, shared mobility, and active transportation” and “Supporting compact land use and infill development” (p.59). We request that performance metrics related to vehicular delay be removed from the CTP.
- The draft CTP claims that roundabouts and signal improvements simultaneously reduce GHG emissions and increase VMT (see Table 10). It appears this claim is based on the assertion that roundabouts “reduce emissions from vehicles that would be idling at a stoplight” (p.72). The idea that reducing emissions from idling has the effect of reducing overall transportation system emissions, despite induced travel from increased intersection capacity, is part of the thoroughly debunked justification for using vehicular delay as an environmental impact metric (discussed above). Increased VMT from these intersection treatments will almost certainly produce more GHG emissions than would be avoided by reduced idling—particularly since an increasing number of modern cars utilize “start-stop systems” to turn off the internal combustion engine when the vehicle is stopped. There are other policy justifications for implementing roundabouts, but they certainly should not be considered a “high-performing” GHG reduction strategy.
- The draft CTP argues that a statewide VMT mitigation bank has a “high” VMT reduction potential (p.81), because credits can be applied where most needed. However, CEQA mitigation is required to be “roughly proportional” to the impacts of the project (Public Resources Code 20180.43). A mitigation bank has the effect of facilitating VMT-increasing projects by allowing them to fund VMT-reducing projects elsewhere. Since mitigation is proportional to impact, a bank would not allow a significant reduction of VMT below the existing baseline. A VMT mitigation bank should therefore not be considered an effective strategy for reducing VMT.
- There may be good reasons for “rural road rerouting” and “interagency partnerships” (p.82), but these are not strategies for reducing VMT. The VMT reduction argument appears to be that these actions can “minimize detours” and “reduce secondary congestion” from closed roads. This is essentially identical to the debunked argument that reducing travel time/delay reduces emissions. In fact, as Handy and Volker put it, “induced travel can be expected to occur anytime a project increases average travel speed,

¹ Handy, Susan and Jamie Volker. January 2025. Induced Travel Primer. <https://escholarship.org/content/qt0kj840w2/qt0kj840w2.pdf>.

² Governor’s Office of Land Use and Climate Innovation (LCI). 2020. Transportation Metrics: Disadvantages of LOS and Auto Delay. <https://lci.ca.gov/ceqa/sb-743/>.

increases travel time reliability, makes driving on the roadway appear safer or feel less stressful, or provides access to previously inaccessible areas,” and the effect may only be “slightly smaller in rural areas, at least in the short run.”³ These should not be considered VMT reduction strategies.

- Transportation System Management and Operations (TSMO) measures (p.83) involve increasing the effective capacity of existing infrastructure without adding lanes. As noted above, these measures will have a comparable induced travel effect to actually adding lanes, and therefore cannot be considered VMT reduction strategies.

Effective Strategies Deserving More Emphasis

- As noted above, the CTP’s “Infrastructure” Goal should include specific recommendations on the need to convert some existing vehicular infrastructure—such as general travel lanes and parking lanes—into dedicated bicycle, pedestrian, and transit facilities. This is a crucially important strategy for achieving the state’s VMT, climate, and equity goals.
- The draft CTP identifies three primary approaches as “especially important” for meeting state transportation goals (p.52). Each of the three approaches is important, but at least two equally important approaches are missing:
 - While “safe, reliable, affordable” transit is critical, high-quality transit service by itself is not sufficient to ensure mode shift. There is stronger evidence for significantly reduced VMT from density, land use mix, and parking management than from transit accessibility and transit service improvement.⁴ These approaches must be given equal emphasis in the CTP. For the same reason, “land use location requirements” should be considered to have a high—not “low-medium” (p.76)—VMT reduction potential.
 - As noted elsewhere in the draft CTP and in these comments, high-quality bicycle facilities are effective at facilitating mode shift. This should be a high-priority strategy in the CTP.
- “Rural transit strategies” are not limited to on-demand or special tourist services (p.83). Rural transit can include high-quality, traditional fixed-route service, particularly in small towns where population is concentrated. Additionally, rural transit improvements don’t require a “long” timeframe for implementation (see Table 18). When funding is available, it doesn’t take long for rural transit agencies to get buses on the road. Investments in high-quality rural transit should be a highly prioritized strategy.
- Tables 7, 11, and 12 inexplicably conclude that much greater reductions in GHG emissions and VMT can be expected from a new bike lane (presumably Class II) than a new separated bike lane (presumably Class IV) or shared use path (presumably Class I). This flies in the face of research that demonstrates that protected bike lanes and other low-stress facilities induce significantly more bike travel than standard bike lanes.⁵ Implementation of protected bike lanes should be a prioritized strategy in the CTP.

³ Handy and Volker 2025

⁴ Handy, Susan, Jamie Volker, and Reyhane Hosseinzade. 2024. Assessing the Effectiveness of Potential Vehicle-Miles-Traveled (VMT) Mitigation Measures. <https://escholarship.org/uc/item/1pf307sp>.

⁵ See for example: Ferencsik, Nicholas N. and Wesley E. Marshall. 2025. The link between low-stress bicycle facilities and bicycle commuting. *Nature Cities* 2: 555-559. <https://www.nature.com/articles/s44284-025-00255-5>.

Safety

- Rates of fatalities and serious injuries should be measured by population, not by VMT (p.54). It has been commonly noted that measuring rates of traffic fatalities by VMT is like measuring rates of cancer per cigarette smoked. Reducing the population-level burden of deaths and injuries is the goal, regardless of how many miles people drive.
- Reduced driving is not something that “could” improve safety (p.72). In fact, VMT is the strongest predictor of population-level road safety outcomes, and reducing overall VMT concurrently increases road safety.⁶
- Because VMT is one of the strongest predictors of safety outcomes, it must be questioned whether the improved safety performance of intersection treatments like roundabouts outweighs the increased safety risk resulting from induced travel (see p.72).

Economics & Fairness

- The CTP’s “Economic Prosperity” goal should include specific mention of the creation of streetscapes in urban, suburban, and small town environments that foster local businesses and a sense of place. Such improvements have been shown to support economic growth.⁷
- Truck and rail throughput (p.61) are not good indicators of an effective freight transportation system. From a transportation system perspective, what matters is the ability of freight to reach destinations, not the volume of freight transported. Freight volumes are out of the control of transportation system operators like Caltrans and likely not the best indicator of economic prosperity and well-being.
- The CTP’s discussion of the fairness implications of dynamic (“surge”) pricing for parking should address not just what drivers pay at the meter (or in the app), but how that pricing affects the net public subsidy for parking, which is paid by nondrivers and drivers alike.

Recommendations

Despite extensive discussion of potential strategies, the draft CTP does not make clear what criteria were used to decide which specific strategies to recommend. Nevertheless, we provide the following comments on the recommended strategies listed in Table 23.

- The Transit Funding strategy must be more ambitious than simply “assessing potential funding programs.” Rather, the goal must be to actually identify and establish a sufficient and reliable funding source. The CTP should also call out the need for transit funding in rural, suburban, and urban communities.

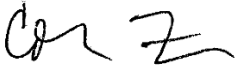
⁶ Ferencak, Nick, Abbas Sheykhfard, and Todd Litman. 2026. Is Reducing Exposure to Motor Vehicles a Road Safety Strategy? SSRN. <https://ssrn.com/abstract=7037279>.

⁷ Smart Growth America and National Complete Streets Coalition. 2026. Complete Streets, Stronger Economies. https://wordpress.smartgrowthamerica.org/wp-content/uploads/2026/07/SGA-Complete-Streets-Stronger-Economies_Web.pdf.

- Selling naming rights and establishing VMT mitigation banks (as discussed above) have no real potential to support the CTP's goals, and should be removed from the list of recommendations.
- A number of highly effective measures to support the CTP's goals are missing from the list of recommendations, and should be added. These include:
 - Conversion of vehicular facilities to serve other modes (as discussed above)
 - Building new bicycle infrastructure
 - Building new EV charging infrastructure
 - Benefits for no-car households
 - Road pricing
 - Large employer Transportation Demand Management programs

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colin Fiske', with a stylized flourish at the end.

Colin Fiske
Executive Director & President
Coalition for Responsible Transportation Priorities
colin@transportationpriorities.org