

California Department of Transportation

DISTRICT 4
P.O. BOX 23660, MS-1A | OAKLAND, CA 94623-0660
(510) 286-5900 | FAX (510) 286-6301 | TTY 711
www.dot.ca.gov



September 24, 2025

Andrew Fremier, Executive Director
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

Dear Mr. Fremier:

The California Department of Transportation (Caltrans) appreciates the opportunity to partner with the Metropolitan Transportation Commission (MTC) in the development of the Next Generation Bay Area Freeways Study (NGFS), an effort partially funded through a Caltrans Sustainable Transportation Planning Grant. Caltrans supports the work that has been completed over the past four years and appreciates MTC for the opportunity to collaborate. The initial phases of the NGFS examined efficient, equitable, and transformational mobility strategies, such as roadway pricing and transit service enhancements or incentives, to offer users more effective and reliable travel options and non-motorized alternatives to driving.

Caltrans expects MTC to expand on topics described in the attached Technical Companion and address them in future phases of the NGFS including focused studies on top performing pathways:

- Continue to emphasize the importance of equity goals and community and partner engagement.
- Improve public transportation service before implementing all lanes tolling, including communication and consensus-building with all transit agencies, so the public has viable alternative transportation options.
- Clarify NGFS goals and keep them consistent throughout the study to set clear expectations for both users and implementers.
- Continue to refine top performing pathways and modeling assumptions.
- Consider dual express lanes as a feasible intermediary step to the implementation of a pricing pathway.

Mr. Andrew Fremier
September 24, 2025
Page 2

Caltrans looks forward to continued coordination and partnership with MTC and reaching shared goals of improving safety and reducing congestion, greenhouse gas (GHG) emissions, and vehicle miles traveled, while promoting equity, prosperity, and sustainability in the region and State. As identified within the NGFS final implementation roadmap as a near-term action, Caltrans will work closely with MTC to update the Bay Area Express Lanes Strategic Plan to ensure consistency with District 4 Managed Lane System Plan. If you would like more information or to discuss further, please contact me, or Aung Maung, Deputy District Director of Operations, at aung.maung@dot.ca.gov or (916) 664-2687.

Sincerely,

David Ambuehl
David Ambuehl (Sep 26, 2025 14:35:19 PDT)

DAVID D. AMBUEHL
Acting District Director

Attachment: Next Generation Bay Area Freeways Study Technical Companion
cc: Next Generation Bay Area Freeways Study Ad-Hoc Executive Group

The Next Generation Bay Area Freeways Study (NGFS) seeks to identify equitable and politically acceptable pricing strategies that will work simultaneously to enhance safety, improve reliability, and reduce congestion, greenhouse gas (GHG) emissions, and vehicle miles traveled (VMT), all while promoting equity, prosperity, and sustainability in the region and State. The initial phases of the NGFS examined and identified top performing mobility strategies to offer Bay Area freeway users more effective and reliable travel options and non-motorized alternatives to driving. Within the future phases of the NFGS, where top performing pathways will be examined in greater detail, it is suggested to further expand on the following:

Continue to emphasize the importance of equity goals and community and partner engagement

The California Department of Transportation (Caltrans) is supportive of the NGFS objective to, “advance outcomes that support Equity Priority Communities,” and Metropolitan Transportation Commission (MTC) engagement with historically underserved communities as well as other potential highway users. The California Transportation Plan 2050, Climate Action Plan for Transportation Infrastructure, and Caltrans 2024-2028 Strategic Plan all identify equitable roadway pricing as one of the top priorities in the State.

As community members and partners in the Bay Area will be impacted by potential roadway pricing, continue to engage with those who will be impacted from all nine Bay Area counties. The Bay Area County Transportation Agencies develop and implement strategies to reduce congestion and improve transportation within each of their respective counties and should all be important stakeholders to advocate for the needs of the community members within their counties.

Improve public transportation service before implementing all lanes tolling, including communication and consensus-building with all transit agencies, so the public has viable alternative transportation options

Caltrans supports transit as a viable low-emission option that provides communities an alternative to single-occupant travel. The success of tolling strategies to increase transit ridership while reducing VMT and GHG emissions is reliant upon improving public transit system capacity and service in coordination with all agencies that provide public transportation services to

meet user expectations within the tolled corridors. Caltrans expects that a substantial investment would be needed to meet user expectations on par with solo driving. In defining, “transit-rich corridors,” to be considered for implementation of pilot corridors, user expectations such as five- to ten-minute peak period headways in addition to reliable and comparable travel times to driving are most note-worthy. Continued engagement with transit agencies in all nine Bay Area counties should occur throughout the NGFS final implementation roadmap to ensure agency support, implementation viability, and route connectivity that allows for mode shift. Long-term equitable mode shift away from solo driving cannot be achieved without offering the public convenient and reliable options to meet their transportation needs.

Clarify goals and keep them consistent throughout the study to set clear expectations for both users and implementers

Public acceptance is critical for the success of this initiative and is partially dependent upon the messaging of the motive behind the implementation of roadway pricing. Ensure goals identified in the beginning of the NGFS planning process are at the forefront of all activities moving forward, to set clear expectations for both users and implementers. While it is recognized that any pricing strategy will become a revenue source, managing congestion while reducing VMT and GHG emissions should remain the primary goals of roadway pricing, which helps incentivize behavior change and encourage mode shift.

Continue to refine top performing pathways and modeling assumptions

General:

Caltrans supports the continued exploration of the identified top performing pathways. During the second stage studies of the pathways, consider developing consistent criteria for all pathways, introduced early in the studies, to measure the success and impacts of tolling strategies and to allow for equitable comparison. Caltrans will support MTC to create a more in-depth explanation about assumptions made in the NGFS report regarding the expected amount of GHG emissions reduction as result of certain pricing rates.

As the pathways are further developed, a Concept of Operations (ConOps) will be needed to clearly define the operational parameters of a pricing strategy.

Caltrans is committed to working closely with MTC and other stakeholders on the development of the ConOps.

All-Lane Tolling:

Caltrans is looking forward to identifying corridors and/or subareas for further study in a collaborative manner.

Milage-Based User Fee:

Caltrans continues to have concerns and questions regarding the results and assumptions made in the model used in the NGFS and is looking forward to further collaboration regarding modeling and final calculations about benefits and costs.

Consider dual express lanes as a feasible intermediary step to the implementation of a pricing pathway

Caltrans supports dual express lanes as an intermediary step in the roadway pricing structure. Caltrans does not agree that conversion from general-purpose lanes to express lanes will increase GHG emissions as indicated in the report.

All lane tolling can be perceived by the public as a form of additional taxation. To overcome this negative perception, Caltrans strongly suggests the completion of the Bay Area Express Lanes Network, which would include closing gaps in the existing network, along with pricing an adjacent general-purpose lane. This would allow examination of how well an expanded Bay Area Express Lanes Network could achieve the intended goals of reducing demand, influencing user behavior, and reducing VMT and GHG emissions without taking away toll-free access of freeways in the Bay Area.