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TRANSPORTATION
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Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105
415.778.6700
www.mtc.ca.gov

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Diana Campbell
Acting Manager, Asset Management
California Department of Transportation
1120 N. Street, MS-82
Sacramento, CA 95814-5680

RE: Comments on Draft 2026 California Transportation Asset Management Plan

Dear Ms. Campbell:

Thank you for the opportunity to comment on the **Draft 2026 California Transportation Asset Management Plan**. MTC appreciates our long-standing partnership with Caltrans District 4 and the California Transportation Commission (CTC) to advance projects that improve safety, reliability, and multimodal access throughout the nine-county San Francisco Bay Area. We value the collaborative approach Caltrans has taken in working with regional and local agencies to align limited state, regional, and local resources toward shared safety, climate, and mobility goals. As we continue maturing our collective asset management practices, MTC sees the TAMP as both a planning document and an ongoing partnership. We look forward to continued exchanges — beyond written comment responses — to ensure the TAMP reflects the best available regional knowledge, consistent data assumptions, and coordinated strategies that support the State's responsibilities for managing the State Highway System under federal asset management requirements.

Transportation Management System Assets

MTC applauds the Department for its continuing commitment to managing more than 20,000 California Transportation Management System (TMS) assets through maintaining a TMS inventory database to strategically and systematically operate, assess, preserve, repair, rehabilitate and replace TMS assets that enable a sustainable infrastructure lifecycle. These investments provide the foundational infrastructure necessary to maximize the performance of the State Highway System (SHS), enable seamless and reliable system operations, and support both the traveling public and the staff of the Department's Transportation Management Centers, who monitor traffic conditions and facilitate incident response.

MTC values our partnership with District 4 in reviewing and evaluating TMS needs to enhance regional system safety and reliability. We look forward to understanding Caltrans's plans to address the 21.9% of TMS elements identified as being in "poor" condition, including interim performance targets and outcomes of recent TMS improvement projects and device upgrades. MTC also encourages

consideration of full lifecycle costs for TMS elements listed in Table 4.18, including costs for traffic controller upgrades, transportation management system software, Transportation Management Center system integration, and the communications infrastructure required to connect field elements back to the TMC.

Given the Department's 10-year SHS performance target of maintaining 90% of primary TMS assets in good condition, MTC strongly supports the Department in seeking additional dedicated funding for the preventative and corrective maintenance of existing and new TMS assets, as well as the associated controller upgrades, communications systems, and software necessary to ensure full functionality and a safe and reliable transportation network.

Local Jurisdiction Assets

MTC appreciates the acknowledgement of the various priorities placed on local jurisdictions' transportation dollars from federal, state, and local policies and regulations. The section on Managing Risks and Building Resilience rightly identifies the need to explore additional and alternative funding for asset management. However, the suggestions included in the Closing the Performance Gaps on the National Highway System (NHS) portion of the TAMP (Section 8.4.2) focus almost solely on redirecting existing funding from non-NHS priorities to NHS priorities. This suggestion would gravely impact non-NHS state of repair if funding were redirected. Therefore, MTC recommends this section also include a discussion of generating new net revenue to fund NHS asset management priorities, rather than depending on redirecting funding from other critical needs.

MTC also appreciates Caltrans' acknowledgement of the concern related to the inability of the Federal Highway Administration (FHWA) established metric to accurately gauge pavement conditions on local streets and roads, largely due to its inclusion of a "roughness" measure. This issue not only leads to inaccurate condition reporting but also effectively eliminates the option for MTC to set its own locally owned NHS pavement targets (apart from the state's) since there is no accurate way to track progress against those targets.

As a potential future remedy, MTC supports Caltrans' suggestion to develop stakeholder working groups committed to advancing asset management initiatives including coordination on performance measurements.

Bay Area Toll Bridges

The Bay Area Toll Authority (BATA) appreciates our partnership with Caltrans in maintaining the region's seven toll bridges and your collaboration in adopting the first Toll Bridge Asset Management Plan (Asset Plan) in January 2026. This plan, grounded in industry best practices and incorporating Caltrans' policies, will guide long-term investments to keep these bridges in a state of good repair. In the draft

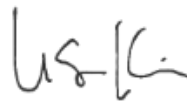
Transportation Asset Management Plan, Caltrans thoughtfully acknowledges a range of transportation plans and supporting documents. As Caltrans updates the TAMP, BATA requests confirmation on the role of the Asset Plan as a source for information related to the Bay Area toll bridges.

MTC strongly believes that California benefits most when transportation asset management is practiced through coordinated, recurring engagement among Caltrans, regional agencies, FHWA, and the CTC. As the federally designated owners and stewards of the SHS, Caltrans is uniquely positioned to maintain a consistent, statewide TAMP framework. MTC stands ready to collaborate through regular meetings, technical working sessions, and joint review processes to support future updates, and ensure that responses to FHWA and the regional users of the assets in the Bay Area reflect coordinated regional and state-level priorities.

MTC looks forward to continuing close coordination with Caltrans and CTC as the 2026 TAMP advances toward adoption and implementation. The region remains eager to work together to ensure that the Bay Area's safety, state-of-good-repair, operational, and multimodal needs are fully considered and assessed. Thank you once again for including MTC in the TAMP process and for providing this opportunity to comment.

Please feel free to contact me (lklein@bayareametro.gov) or Theresa Romell (tromell@bayareametro.gov), MTC's Section Director for Funding Policy and Programs, or David Man (dman@bayareametro.gov), MTC's Section Director for Capital Delivery, Asset Management, and Roadside Tolling, should you have any questions or wish to discuss these comments further.

Sincerely,



Lisa Klein
Deputy Executive Director, Mobility

LK:DM

cc: David Ambuehl, Acting District Director, Caltrans District 4
Tanisha Taylor, Executive Director, California Transportation Commission
David Man, Theresa Romell, Kenneth Kao, Sarah Burnworth,
Rosalyynn Chongchaikit, Nadia Chan, MTC