

**DRAFT 2016 Regional Transportation Plan Guidelines - Comments Log**

Organization	Chapter	Ch. Page	Comment
American Cancer Society Cancer Action Network	NA	NA	<a href="#">American Cancer Society Cancer Action Network</a>
CA Air Resources Board	1.1	3	Change "is evolving" to "has evolved"
CA Air Resources Board	1.1	3	Change "recommends that that State shall" to "directs state agencies to"
CA Air Resources Board	1.1	3	Delete section 1.1 paragraphs 1, 2, 4, 5, 6, 7, 8, 9
CA Air Resources Board	1.1	3	Replace section 1.1 paragraph 1: Every Metropolitan Planning Organization (MPO) is required by law to conduct long range planning to ensure that the region’s vision and goals are clearly identified and to ensure effective decision making in furtherance of the vision and goals. The long range plan, known as the Regional Transportation Plan (RTP), is an important policy document that is based on the unique needs and characteristics of a region, and helps shape the region’s economy, environment and social future. As fundamental building blocks of the State’s transportation system, the RTP must also support state goals for environmental, economic, and social equity.
CA Air Resources Board	1.1	3	Replace section 1.1 paragraph 2: “At the statewide, nonmetropolitan, and metropolitan levels, the transportation plan is envisioned by regulation to be a central document that establishes agreed upon goals, policy decisions, and strategic investment to achieve the goals. It coordinates with investment plans, related planning documents and processes (e.g., Strategic Highway Safety Plans, Asset Management Plans, Congestion Management Process, State Freight Plans, etc.), and programming documents, including the State and metropolitan Transportation Improvement Programs (STIP/TIP). As a result, a performance-based transportation plan sets the foundation of goals, objectives, performance measures, and targets that support decisions for long-range investments and policies, and guide programming, as well as shorter-range decisions that move toward achievement of the desired system performance outcomes.” (FHWA, 2014)
CA Air Resources Board	1.1	3	Replace section 1.1 paragraph 4: If long range transportation plans are intended to achieve stated goals, then it is necessary to have a means to measure the effectiveness of the plan in achieving desired outcomes. Performance-based planning is the application of performance management within the planning process to help agencies achieve desired outcomes for the multimodal transportation system. Performance management helps ensure efficient and effective investment of transportation funds by refocusing on established goals, increasing accountability and transparency, and improving project decision-making (CTP 2040, Appendix 1, Performance Measures).
CA Air Resources Board	1.1	4	Add "integrated land use planning" and "to achieve"
CA Air Resources Board	1.2	5	Change 1.2 sub-chapter to 1.4

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CA Air Resources Board	1.2	5	<p>Insert completely new 1.2 sub-chapter, title, and add: (paragraph 1 of 6)</p> <p>1.2 Performance Measurement to Reflect Goals The State of California has articulated through statute, regulation, executive order, and legislative intent language, numerous state goals for the environment, the economy, and social equity. RTPs are developed to reflect regional and local priorities and goals, but they are also regional instruments for achieving federal and state transportation system goals. Therefore, they must be able to demonstrate how the RTP will achieve those goals.</p> <p>Clearly established state goals include:</p> <ul style="list-style-type: none"> <li>• Greenhouse gas reduction</li> <li>• Improved air quality</li> <li>• Natural resources protection</li> <li>• Smart growth (sustainable land use development)</li> <li>• Affordable housing</li> <li>• Jobs/housing balance</li> <li>• Social equity</li> <li>• Economic development</li> <li>• Safety and security</li> </ul>
CA Air Resources Board	1.2	5	<p>1.2 Performance Measurement to Reflect Goals Insert completely new 1.2 sub-chapter, title, and add: (paragraph 2 of 6)</p> <p>The CTP 2040, Caltrans Smart Mobility Framework, and 2015-2020 Strategic Management Plan are statewide policy documents that reflect the above goals and identify additional priorities such as location efficiency, reliable mobility, accessibility for all people, and fostering livable and healthy communities. The Smart Mobility Framework integrates transportation and land use by applying principles of location efficiency, complete streets, connected multimodal networks, housing near destinations for all income levels, and protection of parks and open space. This is consistent with the goals of sustainable and livable communities that are reflected in SB375. The Strategic Management Plan reflects Caltrans’ mission to “provide a safe, sustainable, integrated, and efficient transportation system to enhance California’s economy and livability “and identifies five key goals, among them, sustainability, livability and economy. This goal is defined as “making long-lasting, smart mobility decisions that improve the environment, support a vibrant economy, and build communities, not sprawl.”</p>
CA Air Resources Board	1.2	5	<p>1.2 Performance Measurement to Reflect Goals Insert completely new 1.2 sub-chapter, title, and add: (paragraph 3 of 6)</p> <p>It is critical that RTPs be developed and evaluated based on a clearly defined set of performance measures to assess a plan’s performance and determine whether the plan is making progress toward achieving the stated goals. Performance measures serve as a basis for comparing alternative improvement strategies, for tracking performance over time, and identifying funding priorities. The selection of performance measures will guide the analysis and selection of policies and investment strategies.</p>
CA Air Resources Board	1.2	5	<p>1.2 Performance Measurement to Reflect Goals Insert completely new 1.2 sub-chapter, title, and add: (paragraph 4 of 6)</p> <p>Performance measurement can be qualitative as well as quantitative. In some regions, the availability of data and tools may limit the ability of an MPO to quantify an RTP’s performance. For each goal, the MPO shall develop appropriate performance measures against which the RTP/SCS will be evaluated, and provide qualitative information if the measures cannot be quantified.</p>
CA Air Resources Board	1.2	5	<p>1.2 Performance Measurement to Reflect Goals Insert completely new 1.2 sub-chapter, title, and add: (paragraph 5 of 6)</p> <p>Collaborative efforts by California MPOs have resulted in documentation of commonly used performance measures, and additional recommended performance measures. In addition, the Caltrans Smart Mobility Framework contains recommended performance measures for use in transportation planning to identify high-performance, cost-effective investments aligned with State and federal goals. Furthermore, Caltrans’s 2016 RTP Review Report recommends that “The CTC should continue collaboration with MPOs, state agencies and Tribal Governments to complete the development of a core set of standardized performance measures and indicators that align with federal and state requirements.”</p>

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CA Air Resources Board	1.2	5	1.2 Performance Measurement to Reflect Goals Insert completely new 1.2 sub-chapter, title, and add: (paragraph 6 of 6)  The benefits of well-designed and appropriately used performance measures are transparency about the benefits of the RTP, not only for transportation system performance, but also for other regionally important priorities such as improved public health, affordable housing, farmland conservation, habitat preservation, and cost-effective infrastructure investment. Performance measures enable greater understanding of the effect of MPO decisions about project selection and funding priorities. Those same performance measures can also demonstrate support for statewide goals, which facilitates public acceptance of the RTP and the State's acceptance of the RTP as part of the State Transportation Improvement Plan. A robust performance measurement system is also useful for analyzing environmental impacts of the RTP/SCS as required by NEPA and CEQA.
CA Air Resources Board	1.2	6	Add "In addition, the 2016 update reflects the data and analysis needs of the CA Air Resources Board to evaluate the Sustainable Communities Strategy component of an MPO's RTP."
CA Air Resources Board	1.2	6	Add "FHWA is still in the process of finalizing the rules for implementation of..."
CA Air Resources Board	1.3	6	Insert completely new 1.3 sub-chapter, title, and add: (paragraph 1 of 4)  1.3 Performance Measures Each MPO must select performance measures through a process involving public input and an assessment of feasibility and appropriateness. The following are broad performance measures that every MPO should use, which are closely related to the above goals. This is not an exclusive list, and each MPO is encouraged to establish additional measures appropriate for their region. <ul style="list-style-type: none"> <li>• GHG emissions reduction</li> <li>• Accessibility</li> <li>• VMT reduction</li> <li>• Public health/air quality</li> <li>• Connectivity</li> <li>• Mobility (including transit and active transportation mode shift)</li> <li>• Equity (including affordable housing)</li> <li>• Prosperity (including job creation, cost savings)</li> <li>• Land conservation (including more compact urban form)</li> <li>• Infrastructure investment priorities</li> <li>• System reliability and safety</li> </ul>
CA Air Resources Board	1.3	6	1.3 Performance Measures Insert completely new 1.3 sub-chapter, title, and add: (paragraph 2 of 4)  The RTP shall discuss the performance measures used, and how the MPO monitors plan performance through the use of these measures. The RTP shall show how the plan performs based on performance measures that are consistently measured by the MPO from one RTP to the next. Plan performance shall be monitored over time to demonstrate how the region is changing in the long term. MPOs shall, with each 4-year RTP update, publish progress reports on short term gains to meeting long term goals.
CA Air Resources Board	1.3	6	1.3 Performance Measures Insert completely new 1.3 sub-chapter, title, and add: (paragraph 3 of 4)  In the context of SB375, performance measures are essential to assessing and comparing alternative transportation and land use scenarios before selecting the preferred RTP/SCS scenario that not only meets the region's GHG reduction target, but also provides substantive co-benefits while supporting social equity. They are also critical for tracking the progress of an SCS. CA Air Resources Board staff analyzes performance measures that are related to the land use and transportation strategies in the SCS to determine whether they provide supportive, qualitative evidence that the SCS could meet its GHG targets. The more robust the MPO's performance measurement, the better an MPO can substantiate its GHG determination. MPOs shall communicate in a transparent way the elements of the SCS (both strategies and investments) that are driving change in the region and resulting in the forecasted outcomes.

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CA Air Resources Board	1.3	6	<p>1.3 Performance Measures Insert completely new 1.3 sub-chapter, title, and add: (paragraph 4 of 4)</p> <p>BEST PRACTICES for performance measurement The following documents contain best practices for performance based planning, and should be referenced in the RTP Guidelines.</p> <ul style="list-style-type: none"> <li>• Transform report entitled “Creating Healthy Regional Transportation Plans” (2012) contains a chapter explaining what the RTP Guidelines are, how they support healthy outcomes, and best practices for public participation. <a href="http://www.transformca.org/resource/creating-healthy-regional-transportation-plans">http://www.transformca.org/resource/creating-healthy-regional-transportation-plans</a></li> <li>• The Nature Conservancy report entitled “Sustainable Communities Strategies and Conservation” includes model policies and best practices for conservation policies in SCSs. <a href="http://www.southernsierrapartnership.org/scs-policy-report.html">http://www.southernsierrapartnership.org/scs-policy-report.html</a></li> <li>• US DOT: Management &amp; Operations in the Metropolitan Transportation Plan: A Guidebook for Creating an Objectives-Driven, Performance-Based Approach <a href="http://www.ops.fhwa.dot.gov/publications/moguidebook/index.htm">http://www.ops.fhwa.dot.gov/publications/moguidebook/index.htm</a></li> <li>• FHWA Model Long-Range Transportation Plans: A Guide for Incorporating Performance Based Planning (2014) <a href="http://www.fhwa.dot.gov/planning/performance_based_planning/mlrtp_guidebook/">http://www.fhwa.dot.gov/planning/performance_based_planning/mlrtp_guidebook/</a></li> </ul>
CA Air Resources Board	1.3	7	Add "There..."
CA Air Resources Board	1.3	8	Add "The California Government Code sets forth the requirements for an RTP to be an internally consistent document that contains a Sustainable Communities Strategy (SCS) in addition to the policy, action and financial elements. With the added requirement for an SCS in 2008, state law placed new emphasis on the RTP as an integrated planning document that promotes sustainable land use and increases mobility options, This heightens the importance of the MPOs as regional leaders to bring together local governments in a collaborative discussion about alternate scenarios for the region’s future."
CA Air Resources Board	1.4	11	Add "Current travel models are not always sensitive to the land use and transportation strategies in an SCS; therefore, MPOs have had to find alternative methods to quantify the GHG emissions reduction benefits of these strategies. Off-model methods are discussed further in Chapter 3."
CA Air Resources Board	1.4	11	Add "land use and..."
CA Air Resources Board	1.4	11	Add "non-auto mobility strategies, and land use projections..."
CA Air Resources Board	1.4	12	Add "and future growth patterns;"
CA Air Resources Board	1.4	12	Add "and land use policies"
CA Air Resources Board	1.4	12	Add "and land use"
CA Air Resources Board	1.4	12	Add "has been identified by the Governor’s Office as the preferred metric"

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CA Air Resources Board	1.4	12	Add "but in the meantime MPOs can look for guidance in the final "Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA" document when it is released."
CA Air Resources Board	1.6	13	This should also mention that there are public participation requirements in state law, SB 375
CA Air Resources Board	2.1	22	Add "EO B-30-15"
CA Air Resources Board	2.3	23	This section is very important, but it is buried in a chapter on the plan "process". We recommend moving this section on promoting health to Chapter 1 which talks about why we plan and the purpose of the RTP
CA Air Resources Board	2.9	39	We are confused about this sentence
CA Air Resources Board	4.1	77	This section appears to describe federal requirements but does not reflect the consultation requirements of state law (SB 375, GC 65080). How is this section on Consultation & Coordination different than the later section on Participation Plan? Can the two sections be combined?
CA Air Resources Board	4.2	78	Add "California Government Code section 65080(b)(2)E)"
CA Air Resources Board	4.4	82	The reader has to go to other sections of the document to see all the consultation requirements. Can all requirements be consolidated in one place?
CA Air Resources Board	4.4	82	Here is a summary of the public participation requirements of SB 375 (GC 65080). Why isn't this mentioned in section 4.1?
CA Air Resources Board	4.8	87	Add "CA Air Resources Board must exchange technical information with MPOs, local air districts, and local governments in developing the regional GHG reduction targets for the MPOs. MPOs are strongly encouraged to participate in the target update process by providing CA Air Resources Board with region-specific target recommendations supported by modeling, technical data and analysis."
CA Air Resources Board	4.10	89	Add "As part of SCS development, MPOs must gather and consider the best available scientific information on resource areas and farmlands within the region which may be impacted by the RTP. State and federal resource agencies may be able to assist MPOs by providing data, maps, or other information."
CA Air Resources Board	4.10	90	Change "Game" to "Wildlife"
CA Air Resources Board	5.5	100	This discussion focuses on federal NEPA requirements but it should also address state CEQA requirements. Including the need to analyze greenhouse gas emissions.

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CA Air Resources Board	5.5	102	Add "Climate Change/GHG Emissions State CEQA regulations require an analysis of the impacts of greenhouse gas (GHG) emissions on climate change. The transportation sector is a significant source of GHG emissions and therefore the analysis of these emissions indirectly resulting from the implementation of RTPs is especially important to analyze and mitigate. Each MPO must identify thresholds of significance for GHG emissions, disclose whether the RTP could result in an exceedance of those thresholds, and propose feasible and enforceable mitigation measures to reduce or minimize the emissions. Simply demonstrating that an RTP can achieve the GHG reduction targets set by the CA Air Resources Board is not sufficient to conclude that the RTP has no impact on climate change."
CA Air Resources Board	5.8	108	Add "5.8 Achievement of SB375 GHG Targets State law requires that an MPO demonstrate that its SCS would, if implemented, achieve the GHG reduction targets set by CA Air Resources Board. These targets are established for each MPO region, for the years 2020 and 2035. MPOs are required to submit their final SCSs and quantification of the GHG emissions reductions to CA Air Resources Board for review and concurrence with the MPO's determination. If the SCS would not achieve the targets, then the MPO must prepare and adopt an Alternative Planning Strategy, describing the obstacles to achievement of the targets and alternative measures that would need to be taken to achieve the targets."
CA Air Resources Board	6.1	112	Add "and land use"
CA Air Resources Board	6.1	112	Add "The Policy Element should clearly describe the SCS strategies, including land use, transportation, and other measure intended to reduce GHG emissions from passenger travel. It should also explain how the financial commitments are consistent with and support the land use pattern and personal mobility objectives of the RTP."
CA Air Resources Board	6.1	112	Add "While maintaining the current transportation network is often a priority for MPOs, MPOs need to be planning ahead for a future in which technology will transform the way that people move and live. MPOs are ideally positioned to anticipate and be responsive to the needs of future generations."
CA Air Resources Board	6.1	113	Add "Although not required by law, MPOs should identify a set of indicators that will be used to assess the performance of the RTP"
CA Air Resources Board	6.1	113	Add "In addition, the RTP should identify the criteria that the MPO used to select the transportation projects on the constrained and unconstrained project lists."
CA Air Resources Board	6.1	113	Add "...must describe the programs and actions necessary to implement the RTP, including the SCS, and assigns implementation responsibilities. The action element may describe the transportation projects proposed to be completed during the RTP plan horizon, and must consider congestion management activities within the region. The action element is critical to providing clear direction about the roles and responsibilities of the MPO and other agencies to follow through on the RTP's policies and projects. "
CA Air Resources Board	6.1	113	This language in this section did not match what's in the statute, so I revised it
CA Air Resources Board	6.1	114	Good
CA Air Resources Board	6.7	123	The following aren't really "modes" (e.g. highways, goods movement) Suggest that they change the order in which the modes are listed. They put highways and roads first, and Bike/Ped at the very end.
CA Air Resources Board	6.13	132	Bike and ped discussion should be moved up closer to the front of the list, next to transit.

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CA Air Resources Board	6.18	139	Please include a paragraph for anticipated future changes to performance measures as a result of the FHWA's Performance Measure NPRM as you did for SB 743 transportation analysis.
CA Air Resources Board	6.23	146	Add "September 2018"
CA Air Resources Board	6.23	146	Add "update to"
CA Air Resources Board	6.23	146	Add "In 2010, the first targets were..."
CA Air Resources Board	6.23	146	CA Air Resources Board will add more language about the upcoming target setting process.
CA Air Resources Board	NA	NA	<p>The following are comments of the California Air Resources Board on Chapter 1 of the MPO RTP Guidelines. (The California Air Resources Board will submit comments on Chapter 3 of the MPO RTP Guidelines separately.)</p> <p>Chapter 1 does not provide the appropriate emphasis on the RTP as a performance-driven plan for which performance measures must be developed and used by the MPO for plan development, implementation, and monitoring. The attached comments include revisions to section 1.1, and language for new sections 1.2 and 1.3. Finally, the attached comments identify several reference documents that discuss best practices for performance based planning and which may be a valuable resource for MPOs.</p> <p>See attachment.</p>
Association of Monterey Bay Area Government	NA	NA	<a href="#">Association of Monterey Bay Area Governments</a>
California Association of Councils of Governments	NA	NA	<a href="#">California Association of Councils of Governments</a>
California Cleaner Freight Coalition	NA	NA	<a href="#">The California Cleaner Freight Coalition</a>
California Coastal Commission	NA	NA	<a href="#">California Coastal Commission</a>
California Natural Resources Agency	NA	NA	<a href="#">California Natural Resource Agency</a>
California Pan-Ethnic Health Network	NA	NA	<a href="#">California Pan-Ethnic Health Network</a>

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CA Department of Public Health	2	22/23	<p>Suggestions for Public Health Content:  Feedback and Recommendations: Section 2. Promoting Health  We commend CTC and Caltrans staff on writing a strong introduction to the “Promoting Health” section. This is a very strong first draft and we have only a couple of recommendations to strengthen it at this time.</p> <p>The connection between the direct health impacts is well articulated, and we recommend building out the connection between transportation and the indirect or secondary public health impacts. For example, secondary health benefits of affordable, accessible transportation and especially active transportation include impacts such as reduced societal and household costs. Extensive public health research demonstrates that health outcomes improve and people live longer when individuals or families have more disposable income.</p> <p>Below is text from a document that CA Department of Public Health wrote with TransForm in 2012 about the connection between health and transportation. Please feel free to use any of the language or examples below. The HiAP team is also available and eager to help wordsmith section 2.3 more directly if needed.</p>
CA Department of Public Health	TBD	TBD	<p><b>Suggestions for Process and Logistics</b>  Request: Extend timeline for RTP and CTP Guidelines finalization.  We request that the timeline for the RTP and CTP Guidelines update process to be extended by 6 months with the goal of finalizing the document by July 1, 2017. We recognize that the current timeline is in response to a request from the Commission, and would request that CTC/Caltrans staff convey our request to the Commission. The three documents in their current form contain more than 350 pages of fairly technical information. Considering the time alone that it takes to read 350 pages, not to mention, do additional research, analysis, coordination and collaboration with other stakeholders, and then to write comments, two 30 day comment periods are likely inadequate for stakeholders to provide meaningful feedback.</p> <p>At a minimum, we suggest extending the first comment period to 60 days, but would more broadly suggest that the process be extended to a full year-long process. Extending the timeline to a year will allow agency/department stakeholders as well as public stakeholders more time to do their due diligence in terms of research, analysis, and engagement and provide more constructive input. Additionally, extending the timeline would likely allow the staff to better align the RTP Guidelines with the CA Air Resources Board’s target setting for the MPO SCS (Jan 2017) and the finalization of SB 743 (calendar year 2017).</p>
CA Department of Public Health	TBD	TBD	<p><b>Suggestions for General Content</b>  <b>Recommendation: Strengthen context and improve usability.</b>  The guidelines in their current state provide a comprehensive overview of what the various requirements and considerations are for an RTP. Given the sheer size and complexity of RTPs, additional language and examples of how to implement the requirements and best practices would likely be useful for both MPO/RTPA staff as well as public and local jurisdiction stakeholders. Additionally, the RTP Guidelines update presents an opportunity for state agencies and departments to not only to update the laws, but to better align other relevant administrative rules, policies, and best practices, making it easier for MPO/RTPA staff to do their jobs and for stakeholders to understand and participate in the process.</p> <p>For example, the draft mentions relevant legislation and policies such as AB 32 and the Governor’s Executive order B-30-15, but provides relatively limited information about how these policies can and should be integrated or considered in the RTP process. In particular, B-30-15 is a newer executive order that establishes very aggressive GHG reduction targets, and many MPOs/RTPAs will likely need additional guidance on how to integrate these new targets into the RTP and SCS process.</p> <p>Another possible example of how to provide additional guidance on implementation is through the use of the “best practices” for each section. Currently many sections either do not have examples for best practices or only contain a handful of examples. These could be built out to provide a couple of sentences of context in addition to links for more information. The additional context sentences will hopefully help users more easily identify which best practices will be most relevant and useful for their own work. While the RTP Guidelines length would increase, this expansion could maximize the efficiency and utility for MPO/RTPA staff.</p>

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CA Department of Public Health	TBD	TBD	<p><b>Recommendation: Improve transparency (peer review and open data) and provide examples of best practices in modeling to capture health impacts.</b></p> <p>The technical nature of modeling makes it challenging from a broader stakeholder transparency standpoint. Many stakeholders will never be able to fully understand the models and how end numbers are generated. Those of us without technical modeling knowledge must rely on the peer review process to ensure that MPOs/RTPAs are using the best and most appropriate models given the available data. We recommend including language or standards for the peer review process for modeling including the reporting of modeling methodologies, making data publically available, etc. While not every community or resident will have the capacity to validate the models, providing the data and methodology publically will enable those with the capacity to do independent modeling verification.</p> <p>Additionally, we recommend including tools to assist with public health modeling. Recognizing that most planners do not have experience modeling the public health impacts of various transportation and land use decisions, there are a number of tools publically and privately available to support MPOs/RTPAs. We highlight the Integrated Transport and Health Impacts Model (I-THIM) later as an example.</p>
CA Department of Public Health	TBD	TBD	<p><b>Recommendation: Include public health in lists of stakeholders to consider for coordination and collaboration.</b></p> <p>Public health partners can provide important data and information about communities’ priorities and vulnerable populations, can assist with stakeholder and community engagement, and can support best practices for promoting equity and health.</p>
CA Department of Public Health	TBD	TBD	<p><b>Recommendation: Enhance information about strategies and best practices for effective cross-sectorial coordination and collaboration.</b></p> <p>Coordination and collaboration are often encouraged in government process, however government staff often need additional assistance in knowing how to build these relationships and operationalize partnerships. The HiAP team has a number of resources on this topic and can provide short but useful tips that could be included.</p>
CA Department of Public Health	TBD	TBD	<p><b>Recommendation: Strengthening the engagement of communities most affected by health inequities, especially communities of color.</b></p> <p>Below are suggestions to strengthen Chapter 4: Consultation and Coordination. The overarching recommendations include: Increased accountability and transparency in decision-making; Greater education of stakeholders before beginning the formal planning process; Creation of a feedback loop to stakeholders about their input; Clearer, more extensive policies to ensure accessibility for stakeholders.</p> <p>Specifically we recommend strengthening the engagement of communities most affected by health inequities, especially communities of color. Below are strategies for ensuring that disadvantaged communities and those most impacted by environmental, land use, and transportation decisions are included in this and other key decision-making processes: Provide adequate notification (and early education efforts) to all residents about important meetings, especially those related to transportation projects that have the potential to increase health inequities, and ensure notifications are reader-friendly, accessible to low literacy levels, and in multiple languages that reflect the language assistance needs of the local community; Provide professional interpretation services at hearings; Ensure that meetings of decision-making bodies are held during times when residents are able to attend, such as after work hours, and in areas that are accessible via public transportation; Create resident advisory committees or roles within existing committees with decision-making authority and identify opportunities for disadvantaged communities to serve as representatives on decision-making bodies; Expand the list of potential partners to include: schools, the faith community, agriculture and food hubs, local business or chambers of commerce, health providers and public health sectors, funders/philanthropy, academia, and environmental health/justice advocates, libraries, law enforcement, parks and recreation, and the technology industry; Create a feedback loop to provide community members information about how their input was included in any drafts and reasons for including/excluding the input.</p> <p>Other ways to improve community engagement and have communities determine their own needs may include: Making sure that there is agreement between residents and the regional planning authority about what community engagement includes; Educating and building capacity of community members on issues such as data, evaluation, storytelling, and mentoring community members new to the process; Using a community health worker or promotora model to identify resident leaders (the California Department of Parks and Recreation does this); Using facilitators with experience in race and power inequities at community meetings.</p>
CA Department of Public Health		13	<p><b>Recommendation: Replace the term "citizen" with "resident" or "community member"</b></p> <p>The word “citizen” implies a legal status and does not encompass all of the people who live in our communities and contribute to California’s growth and development. Therefore, we recommend replacing the term “citizen” with “resident” or “community member.” (pg 13, 79, 84, 125)</p>
CA Department of Public Health		79	<p><b>Recommendation: Replace the term "citizen" with "resident" or "community member"</b></p> <p>The word “citizen” implies a legal status and does not encompass all of the people who live in our communities and contribute to California’s growth and development. Therefore, we recommend replacing the term “citizen” with “resident” or “community member.” (pg 13, 79, 84, 125)</p>

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CA Department of Public Health		84	<b>Recommendation: Replace the term "citizen" with "resident" or "community member"</b> The word "citizen" implies a legal status and does not encompass all of the people who live in our communities and contribute to California's growth and development. Therefore, we recommend replacing the term "citizen" with "resident" or "community member." (pg 13, 79, 84, 125)
CA Department of Public Health		125	<b>Recommendation: Replace the term "citizen" with "resident" or "community member"</b> The word "citizen" implies a legal status and does not encompass all of the people who live in our communities and contribute to California's growth and development. Therefore, we recommend replacing the term "citizen" with "resident" or "community member." (pg 13, 79, 84, 125)
CA Department of Public Health			Suggested Outline: Appendix L (in compliance with AB411)
Climate Resolve	3	49	The bullet point that reads: "Consider developing land use models that are sensitive to transportation scenarios so the effects of land use and transportation policies can interact with feedback in an integrated transportation model." should be strengthened so that it is not an option, but rather a requirement to use modeling best practices.  The whole point of the RTP/SCS planning exercise is to analyze the relation between transportation and land use developments, and so in order to properly do that, such feedback inputs on induced demand are essential.
Climate Resolve	4	107	A key aspect of 'Consultation with Interested Parties' is that such public interest groups be allowed access to the data itself so they can conduct analysis and be able to really engage in substantive dialogue on the topic. Rather than adding additional hurdles to access data, as is the case in SCAG's latest 2016 RTP/SCS, robust engagement around methodologies employed and assumptions made -- aka. "groundtruthing" -- should be encouraged and even facilitated.
Climate Resolve	5	129	In order to improve accountability towards achieving SB375 GHG targets, MPOs should show more specifically where the GHG reductions are coming from. As it is now, with only information presented on the programmatic 'Build vs. No Build' scale, the black box does inspire assurance that GHG targets are actually being met. Greater transparency and greater accountability are needed.
ClimatePlan	NA	NA	<a href="#">Climate Plan</a>
County of Sacramento, Office of Sustainability	NA	NA	<a href="#">County of Sacramento</a>
El Dorado County, Community Development Agency	1	4	Third Full Paragraph: first sentence should be edited as follows: The Regional Transportation Plan (RTP), also called a Metropolitan Transportation Plan (MTP) or Long-Range Transportation Plan is the mechanism used in California to conduct long-range (minimum of 20 years) transportation planning <u>in conjunction with local jurisdictions land use planning</u> in their regions to achieve regional and state goals
El Dorado County, Community Development Agency	1	14	Last paragraph: RTP's should only include land use as provided by jurisdictions. The RTP cannot usurp the land use authority of the local jurisdiction. The first sentence should be edited as follows: The RTPs are developed to provide a clear vision of the regional transportation goals, objectives and strategies.

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El Dorado County, Community Development Agency	1	15	Items #6 and #8: Remove "And land use policies". RTP's have no control of land use policies.
El Dorado County, Community Development Agency	1	15	Last paragraph under <u>Anticipated Future Change to Transportation Analysis</u> : add to sentence that starts on page 15 and end on page 16, "for transit priority areas" (see comment for page 19)
El Dorado County, Community Development Agency	1.1	19	Item #3 , Section 1.1: add to the end of the sentence "for transit priority areas". SB 743 only says (emphasis added) " <b>may</b> adopt guidelines, pursuant to Section 21083 establishing alternative metrics to the metrics used for traffic levels of service for transportation impacts outside transit priority areas." The key word is <b>MAY</b>
El Dorado County, Community Development Agency	2	36	Corridor System Management Planning (CSMP): El Dorado County does not agree with portions of the current CSMP for US 50. Engagement or partnership means actively soliciting comments or input from local jurisdictions and actually taking into consideration their comments and concerns during the draft phase up through completion of the final document. This is not always done in our experience.
El Dorado County, Community Development Agency	2	NA	General Comments: 1) The Guidelines should be edited for spelling, grammatical errors and punctuation 2) MPO's have no land use authority; any reference to land use policies need to clearly state that the ultimate land use authority is the local jurisdiction
El Dorado County, Community Development Agency	2.2	24	Background on Climate Change Legislation, second paragraph: 37% is not approximately half; it is closer to a third. Revise to say one third.
El Dorado County, Community Development Agency	3	52	The text states "Every component of a model must be validated as well as the entire model system." The term "component" is rather vague. This language could be referring to modes, time frames, inputs or outputs, geographical regions, roadway classification, etc. We suggest inserting more specific language.
El Dorado County, Community Development Agency	3	55	Static Validation Criteria and Thresholds Table - We request that the model validation criteria and a brief explanation of the process use to review/develop the criteria be provided in the next round of draft guidelines, so that stakeholders have an opportunity to review and comment on any proposed changes to the validation criteria.
El Dorado County, Community Development Agency	3	60	"The VMT by facility type and by county should be compared against the observed data (e.g. HPMS or observed data)." - VMT cannot be measured today, VMT can only be estimated through statistical analysis. This statement should be revised to reflect that.
El Dorado County, Community Development Agency	3	60	bullet 4 under "Best Practices" - change the word "from" to "since"
El Dorado County, Community Development Agency	3	60	bullet 6 under "Best Practices" is a repeat of the paragraph under the "Model Peer Review/Peer Advisory Committee"
El Dorado County, Community Development Agency	3	60	Best Management Practices - this section seems misplaced. It does not have anything to do with modeling. Perhaps move to a different chapter?

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El Dorado County, Community Development Agency	3	61	second bullet under "Travel Demand Models" - limits presented are not reasonable for rural areas. TAZ's representing rural areas may have a population of 200 and cover 20 square miles. We would suggest revising this guidance to accommodate models for rural areas. Perhaps it would be most effective to only reference the upper limit on the daily trips (i.e. a TAZ "should not generate more than 15,000 person trips per day").
El Dorado County, Community Development Agency	3	62	bullet 3 - Auto operating costs are only an important input if there are other modes readily available. In rural areas, where biking, walking, and or taking transit to your destination is often infeasible, auto operating costs do not affect travel. Auto ownership should be factored in, but that is already discussed in other areas of this chapter. We recommend changing this "shall" to a "should"
El Dorado County, Community Development Agency	3	62	bullets 6, 10, and 13 are repeated paragraphs. They should be deleted. Same with the first bullet on page 63.
El Dorado County, Community Development Agency	3	NA	General Comments: 1) The Guidelines should be edited for spelling, grammatical errors and punctuation 2) This chapter is difficult to read and understand. The addition of summary tables, re-formatting, re-organizing, and adding explanatory statements before the bulleted list may help with clarity. 3) e respectfully disagree with comments made at the July 13, 2016 RTP Guidelines workshop that stated the RTP Guidelines should focus only on how the guidelines affect the development of RTP's. The RTP Guidelines, specifically the Modeling chapter, are regularly used as the benchmark for development of regional/local agency's models. Additionally, transportation planners/engineers refer to the RTP Guidelines for guidance on any sub-area validation that is performed for development-driven or infrastructure projects. We request that this audience and application is kept in mind when drafting language for the RTP Guidelines.
El Dorado County, Community Development Agency	4	99	The second paragraph discussion of the agencies and entities with legal standing should be incorporated into the first paragraph discussion. MPO's cannot project future land use without the agencies and entities that actually have the authority to do so.
El Dorado County, Community Development Agency	4	NA	General Comments: 1) The Guidelines should be edited for spelling, grammatical errors and punctuation 2) MPO's have no land use authority; any reference to land use policies need to clearly state that the ultimate land use authority is the local jurisdiction
El Dorado County, Community Development Agency	5	117	fourth paragraph, second sentence add the following to the end of the sentence, "in transit priority areas." SB743 only says (emphasis added) " <b>may</b> adopt guidelines, pursuant to Section 21083 establishing alternatives metrics to the metrics used for traffic levels of service for transportation impacts outside transit priority areas." The key word is <b>MAY</b> .
El Dorado County, Community Development Agency	5	NA	General Comments: 1) The Guidelines should be edited for spelling, grammatical errors and punctuation 2) MPO's have no land use authority; any reference to land use policies need to clearly state that the ultimate land use authority is the local jurisdiction
El Dorado County, Community Development Agency	6	133	The Policy Element, third paragraph: The first sentence should be edited as follows: The Policy Element should clearly convey the region's transportation and land use policies <u>of the local jurisdictions</u> . The MPO's have no land use authority.
El Dorado County, Community Development Agency	6	NA	General Comments: 1) The Guidelines should be edited for spelling, grammatical errors and punctuation 2) MPO's have no land use authority; any reference to land use policies need to clearly state that the ultimate land use authority is the local jurisdiction

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El Dorado County, Community Development Agency	NA	NA	General Comments: 1) The Guidelines should be edited for spelling, grammatical errors and punctuation 2) MPO's have no land use authority; any reference to land use policies need to clearly state that the ultimate land use authority is the local jurisdiction
Fresno Council of Governments	1	3	The long range transportation planning process in metropolitan areas is uniquely suited to address a number of state and regional goals, from supporting economic growth to achieving environmental goals and promoting public health and quality of life. Comment: RTPs are also created to meet federal goals too, not just state and regional goals as stated in this paragraph.
Fresno Council of Governments	1	4	The Regional Transportation Plan (RTP), also called a Metropolitan Transportation Plan (MTP) or Long-Range Transportation Plan is the mechanism used in California for Metropolitan Planning Organizations (MPOs) to conduct long-range (minimum of 20 years) integrated land use and transportation planning in their regions to achieve regional and state goals. Because transportation infrastructure investments have substantial effects on travel patterns, smart investments play a key role in meeting climate targets." Comment: RTP is and has been a long range transportation planning document. MPOs do not have the jurisdiction for land use planning, which still rests with the local governments, as stipulated by the SB375 legislation. Although the SCS is a product of integrated land use and transportation planning, integration of forecasted land use pattern is done through the collaboration with local land use agencies. Again, the RTP is developed to achieve federal, state and regional goals, not just state and regional.
Fresno Council of Governments	1	8	The 2010 update was prepared to incorporate new planning requirements as a result of SB 375 and to incorporate the addendum to the 2007 RTP Guidelines. SB 375 requires the 18 MPOs in the state to identify a forecasted development pattern and transportation network that, if implemented, will meet greenhouse gas emission reduction targets specified by the California Air Resources Board (CA Air Resources Board) through their RTP planning processes.
Fresno Council of Governments	1	9	paragraph 4: Comment: the Planning Final Rule has been published, and should be incorporated in the 2016 RTP Guideline
Fresno Council of Governments	1	9	paragraph 6: "The FTIP is defined as a constrained four-year prioritized list of regionally significant transportation projects that are proposed for federal, state and local funding." Comment: FTIP include both regionally significant and non-regionally significant projects.
Fresno Council of Governments	1	13	last paragraph: "Transportation planning by MPOs is a collaborative process, led by the MPO, state, tribal, and other key stakeholders in the regional transportation system." Comment: rewrite: The regional transportation planning process led by the MPOs is a collaborative process that is widely participated by the federal, state, local, and tribal governments/agencies, as well as key stakeholders and the general public.
Fresno Council of Governments	1.6	15	"The State of California and federal transportation agencies allocate millions of dollars of planning funds annually to help support California's transportation planning process. The RTP establishes the basis for programming local, state, and federal funds for transportation projects within a region. State and federal planning and programming legislation has been in place and is periodically revised to provide guidance in the use of these funds to plan, maintain and improve the transportation system."
Fresno Council of Governments	2.1	23	"Section 65080 states RTPs shall include the following:"
Fresno Council of Governments	2.2	25	"5. Requires the California Transportation Commission (CTC) to maintain guidelines for the use of travel demand models used in the development of regional transportation plans that, taking into consideration MPO resources, account for: 1.) the relationship between land use density, household vehicle ownership, and vehicle miles traveled (VMT), consistent with statistical research, 2.) the impact of enhanced transit service on household vehicle ownership and VMT, 3.) likely changes in travel and land development from highway or passenger rail expansion, 4.) mode splitting that allocates trips between automobile, transit, carpool, bicycle and pedestrian trips, and 5.) speed and frequency, days, and hours of operation of transit service." Comment: Please provide the section code for this citation.

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Fresno Council of Governments	2.3	27	"Transportation decisions can prioritize active transportation investments, and that in turn increase walk and bike mode shares and help a community to lower its rates of obesity, hypertension, and other chronic diseases" Suggested wording: If a higher level of investment is made on the active transportation, the walk and bike mode share could be increased, which will help a community lower its rates of obesity, hypertension and other chronic diseases.
Fresno Council of Governments	2.4	28	"For MPO non-attainment regions, the FHWA and FTA are responsible for making the RTP conformity determination. "
Fresno Council of Governments	2.5	29	"3. Federal Transportation Improvement Program - The FTIP is a financially constrained four-year program listing all federally funded and regionally significant projects in the region. " Comment: again, the FTIP includes both regionally significant and non-regionally significant projects.
CA Department of Housing and Community Development	2	22	4. . . .Housing element updates are moved from five year cycles to eight year cycles for member jurisdictions of all MPOs classified as non-attainment or maintenance required to adopt an updated RTP every four years and for jurisdictions within other MPOs and RTPAs that elect to change the RTP adoption schedule from five years to every four years pursuant to Government Code Section 65080 (b)(2)(M). The State Department of Housing and Community Development’s (CA Department of Housing and Community Development) RHNA process, that subsequently triggers each local government’s housing element process, is first triggered based on the requirement for regional planning agencies to notify CA Department of Housing and Community Development of the estimated RTP adoption date 12 months before the adoption date. Regional planning agencies should carefully estimate a realistic RTP adoption date in providing the 12 month notice to CA Department of Housing and Community Development and not adopt a RTP at a later date. State housing law requires RHNA and housing element schedules to align. SB 375 amendments require alignment among RHNA, housing element, and RTP schedules. An RTP adopted past the estimated date creates a schedule and planning period conflict between RHNA and housing elements. This is because the RHNA planning period and amount of new housing units allocated to local government to plan for in updating the housing element is set based on the estimated RTP adoption date whereas the housing element start date and planning period is set 18 months from the actual RTP adoption date. RTP adoption past the estimated adoption date relied on by CA Department of Housing and Community Development in determining new housing unit allocation for a specific planning period shifts the housing element planning period to an ending period that lacks a requisite housing unit allocation.
CA Department of Housing and Community Development	2	26	Time/Horizon Contents Update Requirements - RTP - RTPAs – Every 5 Years, add "(State law allows option to change update schedule from 5 to 4 years)"
CA Department of Housing and Community Development	2	27	Consistency with Other Planning Documents (CA Department of Housing and Community Development note for consideration: regional planning agencies indicate desire for term “consistency” to be defined).
CA Department of Housing and Community Development	2	38	MPOs may revise the transportation plan at any time using the procedures in this section without a requirement to extend the horizon year. Add, "Regional planning agencies should consult with local governments well in advance of adopting an RTP to ensure an RTP adoption date facilitates alignment of the RTP schedule, Regional Housing Need Allocation schedule and planning period, and local government housing element update schedule and planning period, pursuant to SB 375 amendments."
CA Department of Housing and Community Development	2	38	An MPO that is required to adopt a regional transportation plan not less than every five years, may elect to adopt the plan not less than every four years in order that their member cities and counties can revise their housing elements every 8 years pursuant to Government Code Sections 65080 (b)(2)(M) and 65588(b). Delete language as this deadline passed for this option? (CA Department of Housing and Community Development comment: Don’t delete: option is still available to a few RTPAs remaining on 5-year RTP schedule)

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CA Department of Housing and Community Development	2	35-36	RTP Development Sequencing Process Add last sentence, "SB 375 amended the law to require regional planning agencies to estimate the RTP adoption date and provide CA Department of Housing and Community Development a notice at least 12 months before the estimated adoption date. [GC 65588(e)(5)]"
CA Department of Housing and Community Development	6	147	In developing an SCS, an MPO shall consult with cities and counties about their existing general plans and foreseeable changes to their general plans over the period covered by the RTP, add, "particularly regarding regional housing need allocation (RHNA), residential zoning, and programmatic actions addressed in the local housing element and status of housing element update requirements."
CA Department of Housing and Community Development	6	148	Regional Transportation Plans are to be updated at least every four years for non-attainment areas, and every five years for attainment areas - add, "unless an election was made to update every four years pursuant to GC 65580(b)(2)(M)."
CA Department of Housing and Community Development	6	149-150	(CA Department of Housing and Community Development re-order and revision) 1. Consultation with Department of Housing and Community Development (CA Department of Housing and Community Development) regarding CA Department of Housing and Community Development's determination of Regional Housing Need Allocation (RHNA) (at least 26 months) prior to local governments' housing element due date: The regional planning agency is required to distribute RHNA shares to each local government at least 12 months prior to local governments' housing element due date (GC 65584.01(c)(1)). 2. Methodology Development for COG's RHNA Plan (at least 24 months before housing element due date): the COG, with survey information and participation of its local governments, develops methodology for the Regional Housing Need Plan and distribution of all of the region's RHNA (GC 65584.04). 3. Distribution of draft Regional Housing Need Plan and new housing unit allocations (at least 18 months before the due date for adoption of the housing element): the COG, based on the Draft RHNA Plan, distributes a draft RHNA of new housing unit need to each city and county government in the region. The Draft RHNA Plan must allow the prescribed number of days for a local government to first request revision to its shares of RHNA and next appeal its shares of RHNA at a public hearing.(GC 65584.05 This plan is developed concurrently with development of the RTP, including the SCS. 4. RHNA Plan Adoption (adopted at least one year before the housing element due date): the COG is required to adopt a Final RHNA Plan and within three days submit the RHNA Plan to CA Department of Housing and Community Development [GC 65584.05(h)]. 5. CA Department of Housing and Community Development Approval of Final RHNA Plan (CA Department of Housing and Community Development's review and finding of the adopted RHNA Plan is due within 60 days of the adoption date): the final RHNA Plan is subject to CA Department of Housing and Community Development approval or revision to ensure the RHNA Plan is consistent with the region's existing and projected housing need [GC 65584.05(h)]. 6. Local Government Housing Element (must be updated within 18 months of adoption of the RTP): each local government within the region must adopt an updated housing element specifying housing sites, capacity, policies, and programs that will accommodate all of its shares of RHNA distributed based on the Final RHNA Plan approved by CA Department of Housing and Community Development (GC 65583, 65588).
CA Department of Housing and Community Development	6	154-155	Government Code Section 65080(b)(2)(C), (D) and (N) assigns certain responsibilities and collaboration requirements or options for the development of an SCS in multi-county MPO regions and in the San Joaquin Valley. The AMBAG and SACOG multi-county MPO regions are not specifically addressed in 65080(b)(2)(C), (D) or (N) however, RTPAs within these regions should work closely with the appropriate MPO when developing their RTPs for inclusion in the MPOs RTP, as these multi-county MPO regions are still required to fully comply with the SCS requirements outlined in 65080(b)(2)(B). Retain or delete this sentence? CA Department of Housing and Community Development Comment: Delete
Humboldt County Association of Governments	3	50-59	There are many, many typos in the draft. I started at chapter 3; I highlighted where there is incorrect syntax (e.g. wrong verb tense), missing words, or wrong punctuation.  I also noticed typos on page 27, 103, and 105.  I haven't read other parts. It's discouraging to read a draft that doesn't seem ready yet for public review.  I will read the RTPA draft. I won't read any more of the MPO draft, so I don't have any more comments on it.  Thanks.

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Leadership Counsel for Justice and Accountability	NA	NA	<a href="#">Leadership Council for Justice &amp; Accountability; Central CA Asthma Collaborative; Central CA Environmental Justice Network</a>
Orange County Transportation Authority	1.1	3	<ul style="list-style-type: none"> <li>Where the Guidelines state that the long range transportation planning process is uniquely suited to address state and regional goals, consider revising to read “local and regional goals”.                             <ul style="list-style-type: none"> <li>The goals are established at the local and regional levels, and can be influenced by state and federal requirements/recommendations.</li> </ul> </li> </ul>
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> <li>Clarify that SB 375 and SB 743 have a common goal of encouraging higher-density development, and use GHG emission reductions, in part, as a means to achieving that goal.</li> <li>The Guidelines state that SB 743 strengthens the connection between land use planning and transportation investments.                             <ul style="list-style-type: none"> <li>It could be argued that SB 743 creates more of a divide between land use and transportation planning, as it encourages infill development, while reducing or eliminating the need to provide transportation infrastructure that may be needed to support associated increases in travel demand.</li> </ul> </li> </ul>
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> <li>B-30-15 has a target of 40% below 1990 levels by 2030, not 2050.                             <ul style="list-style-type: none"> <li>The EO recommendation to the "State" does not apply to MPOs. Please clarify this distinction.</li> </ul> </li> </ul>
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> <li>The CTP 2040 has already been developed, and it demonstrates that the best long-term method for reducing GHG emissions is through integration of zero- and near-zero emission technologies.                             <ul style="list-style-type: none"> <li>SCS-type strategies had a limited impact that dwindled over time.</li> <li>Further, the reference to the specific CTP 2040 should be avoided, as a new CTP will probably be developed before these Guidelines are updated again, making the reference dated.</li> </ul> </li> </ul>
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> <li>Consider removing the reference to CCA Air Resources Board's model results showing VMT will have to be kept to a 5.5 percent increase.                             <ul style="list-style-type: none"> <li>This could easily change, as all modeling efforts include assumptions that can quickly change.</li> <li>If it does stay in, please cite the source, so we know when it is outdated.</li> </ul> </li> </ul>
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> <li>Again, consider stating that RTPs are used “to achieve local and regional goals”, rather than “regional and state goals”.</li> </ul>
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> <li>Please consider removing the phrase "substantial" when referencing the effect of transportation investments on travel patterns.                             <ul style="list-style-type: none"> <li>It can be argued that land use development has, at least, as great an impact on travel patterns as transportation investments. The use of "substantial" seems to imply that transportation investments are the primary driver.</li> </ul> </li> </ul>
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> <li>Again, in the last paragraph, it is not necessary to specify transportation investments, as there are many factors that influence travel.                             <ul style="list-style-type: none"> <li>The studies cited don't say with certainty that capacity causes VMT to increase. At best it shows that there is a correlation between the two (VMT tends to increase with capacity, and capacity tends to increase with VMT). They also don't seem to discuss how the facilities would perform (in terms of level of service) without capacity increases.</li> </ul> </li> </ul>
Orange County Transportation Authority	1.1	5	<ul style="list-style-type: none"> <li>There does not appear to be a clear assessment in the Mobile Source Strategy that identifies the allowable VMT growth without exceeding the 2030 and 2050 GHG emission goals. There is only an assumption of a reduced VMT growth rate as part of a scenario that includes many other assumptions, which results in exceeding the 2030 goal.</li> </ul>
Orange County Transportation Authority	1.1	NA	This section focuses on climate change goals and glosses but does not discuss the many other reasons for developing an RTP; namely, the federal transportation conformity requirements.

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Orange County Transportation Authority	1.3	8	<ul style="list-style-type: none"> <li>The references to the federal surface transportation bills seem out of place. Consider working these in to the following paragraph as part of the discussion regarding the need for the 2016 update.</li> </ul>
Orange County Transportation Authority	1.5	14	<ul style="list-style-type: none"> <li>Consider adding language preceding the list of SCS related actions, to clarify what this list contains.                             <ul style="list-style-type: none"> <li>Under item 1, consider using the term "mobility strategies" (rather than "non-auto mobility strategies") to better capture the full range of strategies that may be incorporated to reduce GHG emissions. These could include planning for additional ZEV charging facilities, promoting services like shared vehicles or rideshare options with ride sourcing, etc...</li> <li>Also under item 1, consider replacing the term "land use projections" with "land use strategies" or "scenarios".</li> </ul> </li> <li>Strike the addition of "and land use" in the last paragraph.                             <ul style="list-style-type: none"> <li>Land use planning authority is with local jurisdictions. Additionally, the next line states that the vision must be realistic and within fiscal constraints. The SCS land use exercise is not required to be realistic nor fiscally constrained.</li> </ul> </li> </ul>
Orange County Transportation Authority	1.5	15	<ul style="list-style-type: none"> <li>Under item 6 in the list, consider replacing "land use policies" with "land use strategies".</li> </ul>
Orange County Transportation Authority	1.6	16	<ul style="list-style-type: none"> <li>Consider striking the last line of the paragraph that states MPOs can anticipate guidance in the final proposal being developed by OPR.                             <ul style="list-style-type: none"> <li>MPOs should wait for the final rule before taking any action, as further public review and analysis is still required.</li> </ul> </li> </ul>
Orange County Transportation Authority	2.2	24	<ul style="list-style-type: none"> <li>For item 2, under SB 375, consider revising the language from "will be achieved" to "can be achieved".</li> </ul>
Orange County Transportation Authority	2.2	NA	<ul style="list-style-type: none"> <li>Consider changing the title of this section to "Background on State Climate Change Actions", since executive orders are not "legislation"</li> </ul>
Orange County Transportation Authority	2.3	27	<ul style="list-style-type: none"> <li>Please clarify that planning and implementing active transportation infrastructure, and supportive land uses, are primarily actions led by local jurisdictions.</li> <li>Please clarify that investments in active transportation infrastructure generally provide for more attractive facilities that may lead to a shift in mode share and health benefits; however, land use patterns play at least as large a role in encouraging more active mode choices.</li> <li>Add language explaining that the role of the RTP, in addressing public health, is to demonstrate transportation conformity, and to set goals and strategies that encourage implementing agencies to make investments that benefit public health.</li> <li>Add language explaining the public health benefits associated with investments and strategies that improve air quality.                             <ul style="list-style-type: none"> <li>Particularly those that address criteria pollutants, which are scientifically shown to be detrimental to health. Key strategies controlled by local implementing agencies include pricing, carpooling, transit, signal synchronization, and other TDM/TSM improvements.</li> <li>Add language explaining that some key strategies that benefit air quality and public health are controlled at the state and federal levels, such as vehicle emission and fuel standards, as well as incentive programs to expedite the penetration of clean technologies. These have been shown to be by far the most effective strategies for reducing the public's exposure to harmful pollutants, as well as for reducing greenhouse gas emissions.</li> </ul> </li> </ul>
Orange County Transportation Authority	2.7	32	<ul style="list-style-type: none"> <li>Consider beginning the Complete Streets discussion with "The term Complete Streets refers to a transportation network that is planned, designed..."                             <ul style="list-style-type: none"> <li>This helps to clarify that "complete streets" is not about every facility providing for every mode. Rather, the goal is to provide a network that ensures mobility and accessibility for all users.</li> </ul> </li> </ul>
Orange County Transportation Authority	6.13	157	The impact of land uses that support active transportation needs to be emphasized at least as much as the transportation network.

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Orange County Transportation Authority	6.14	159	Why change "operations & management" to "management and operations"?
Orange County Transportation Authority	6.18	164	"Measured metrics" seems redundant. Consider just "metrics".
Public Advocates	NA	NA	<a href="#">Public Advocates (July 29)</a>
Public Advocates	NA	NA	<a href="#">Public Advocates (August 5)</a>
Sacramento Area Council of Governments	NA	NA	<p>Regarding "Best Practice" recommendations in the draft guidance: We recommend changing the reference from "best practice" to "exemplary practice". We request adding to the introduction of the document the process and criteria used to identify best practices. The concern here is that the specific listed best practices may be interpreted as a limiting list (i.e. that CTC has comprehensively reviewed all practices for a particular topic area, that the identified sources were determined to be the best, and that all other potential sources for practices on that topic are less relevant or valuable to developing an RTP). Based on the limited listings, we presume that the listings are a few examples of best practices, and that many other sources may be appropriate or relevant for preparation of an RTP.</p> <p>We suggest that in each section of the guidelines where there are "shoulds" and best practices referenced, that the reader is simply directed to an appendix of recommendations and best practices, rather than identifying the reference in text.</p> <p>Regarding the SB375 GHG target setting: those targets will not be set prior to adoption of these guidelines. There's currently a note in the draft (p.171) that is a placeholder about the targets. We could make a similar comment to the SB 743 comment – to state legislative intent, with no statement about what is required.</p> <p>There are statements throughout that the California Transportation Plan should be used as a reference for particular components of the RTP update process or the RTP itself (e.g. in the "public participation" and "asset management" sections), but there's no explanation as to why or how. Where the CTP is suggested as a reference to be explicitly included in the RTP, please clarify how the CTP should be referenced. The concern here is in part based on the CTP as a unconstrained plan (RTP's are by definition constrained), and a plan with 2050 horizon (as opposed to the variable 20 year horizons for the RTP's)</p>
Sacramento Metropolitan Air Quality Management District	NA	NA	<a href="#">Sacramento Metropolitan Air Quality Management District</a>
San Diego Association of Governments (SANDAG)	1.1	3	The last paragraph on page 3 states that, "As approximately half nearly forty percent of GHG emissions in California come from the transportation sector...". Similar language is also provided on page 24 of Section 2.2. The Draft Guidelines do not include a source for this statement. In contrast, the CA Air Resources Board Scoping Plan (2014) states that, "California's transportation system accounts for about 36 percent of California's GHG emissions..." (see page 46 at <a href="http://www.CA Air Resources Board.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf">http://www.CA Air Resources Board.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf</a> ). The RTP Guidelines should be consistent with the CA Air Resources Board's Scoping Plan.
San Diego Association of Governments (SANDAG)	1.1	4	The first line on page 4 says, in part, that the "...transportation planning process in metropolitan areas has evolved to address climate change goals". SANDAG agrees that the statement is true, but suggests the RTP Guidelines also include language acknowledging the many other goals that RTPs are required to balance alongside climate change goals.

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San Diego Association of Governments (SANDAG)	1.1	4	The first paragraph on page 4 ends with this sentence: "Modeling undertaken by CA Air Resources Board shows that Vehicle Miles Traveled (VMT) will have to be kept to a 5.5 percent increase through 2030 in order to satisfy the Executive Order (B-30-15)." The Draft Guidelines do not include a source for this statement. SANDAG requests that this statement and other similar statements about CA Air Resources Board modeling in the Guidelines (e.g., top of page 5, top of page 16) be removed for the following reasons: 1. SB 375 establishes the role of RTPs/SCSs in statewide greenhouse gas (GHG) reduction goals. SB 375 sets regional per capita GHG reduction targets (not VMT reduction targets) for passenger vehicles. 2. CA Air Resources Board is currently preparing an update to the Scoping Plan to reflect the 2030 target established by Executive Order (EO) B-30-15. Among other things, the second update to the Scoping Plan is expected to show the amount of GHG reductions needed from RTPs/SCSs in order to achieve the statewide 2030 target set by EO B-30-15. The second update to the Scoping Plan will go through the public comment process. 3. CA Air Resources Board is also currently in the process of updating SB 375 regional targets. These are expected to go into effect in 2019, thus applying to the RTP/SCS that SANDAG plans to adopt in 2019. SANDAG assumes the updated targets will have a strong relationship to the Scoping Plan update currently underway. This statement does not provide guidance that will help MPOs prepare RTPs/SCSs or help the public understand the purpose of an RTP/SCS. Furthermore, it could confuse the public about the role of RTPs/SCSs in statewide GHG reduction goals.
San Diego Association of Governments (SANDAG)	1.1	4	The second to last paragraph on page 4 states, in part, that MPOs "...conduct long-range (minimum of 20 years) integrated land use and transportation planning". The word "conduct" should be removed from this statement, as MPOs do not have authority to conduct land use planning. The role of local jurisdictions in land use planning is specifically protected under SB 375. Please revise this statement to reflect the roles of both MPOs and local land use authorities in conducting coordinated land use and transportation planning.
San Diego Association of Governments (SANDAG)	1.2	5	In the discussion of the relationship between RTPs and the California Transportation Plan (CTP), please provide greater explanation of the differences between the two documents. For example, the Draft RTP Guidelines could include clear statements that the CTP is "aspirational," and is not fiscally constrained, is not project specific, and is not subject to both federal air quality conformity regulations and the California Environmental Quality Act. As a result, the CTP is not required to support its assumptions with substantial evidence.
San Diego Association of Governments (SANDAG)	1.7 2.4	16 ; 27	In both chapters (Chapter 1.7, page 16, and Chapter 2.4, page 27), update "changes to federal planning factors" to include new Planning Final Rules factors, such as: "Improve resiliency and reliability of the transportation system and reduce or mitigate stormwater impacts of surface transportation; and enhance travel and tourism."
San Diego Association of Governments (SANDAG)	2.7	32	The third paragraph states: "The benefits of Complete Streets include: Safety; Health; Greenhouse Gas Emission Reduction; and Economic Development and Cost Savings." Please provide a citation for this statement (and other such qualitative statements) regarding the benefits of Complete Streets in this section. The CA Air Resources Board Research Seminar "Effects of Complete Streets on Travel Behavior and Exposure to Vehicular Emissions" found that, "overall, the findings of [the] study, although preliminary and difficult to generalize, suggest that the complete streets have favorably impacted some, but not all, tested parameters and the differences between complete and incomplete streets are site-specific and vary greatly depending on the location and function of the complete streets." The study can be found here: <a href="http://www.CA Air Resources Board.ca.gov/research/seminars/zhu2/zhu2.htm">http://www.CA Air Resources Board.ca.gov/research/seminars/zhu2/zhu2.htm</a>
San Diego Association of Governments (SANDAG)	2.8	40	The RTP Development flowchart includes the following step: "MPO takes 1-2 years to gather data, run models, prepare draft RTP, SCS (and APS if applicable), RHNA allocation, and the environmental document to comply with CEQA". SANDAG requests that this step be changed to 2-3 years duration, which better reflects the complexity and level of effort involved in this step. The four-year RTP development cycle is now essentially continuous, with development of the next RTP starting as soon as the current RTP is adopted.
San Diego Association of Governments (SANDAG)	3	NA	At a meeting between CTC staff, MPO representatives, and other state agencies on August 1st, 2016, CTC indicated it will be making significant alterations to Chapter 3 of the Draft 2016 RTP Guidelines. Since it is likely that Chapter 3 will change, SANDAG is only providing general comments on Chapter 3 at this point in time. Once the updated chapter is re-released, SANDAG will review and may choose to provide more detailed comments at this time. The modeling section should be streamlined to reduce redundancy in the discussion of the requirements and recommendations. For example, interagency consultation in the context of 40 CFR Section 93.110(a) is discussed on pages 50, 51, 52, 56, 59, and 69. Streamlining the guidelines around regulatory and legislative requirements will make the guidelines more useful to MPOs and more accessible to the general public.

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San Diego Association of Governments (SANDAG)	3.2	47	Consider adding to the language in the third "Technical Tools" bullet so that it reads as follows: "This typically involves comparing "no build" or existing conditions with alternatives...". Also, consider deleting the words "the no-build and" from the third sentence.
San Diego Association of Governments (SANDAG)	3.3	49	Under the "EMFAC Model" header, there is a statement that reads: "The most recent approved version is EMFAC2014". Please revise this statement to note that "approved" means approved for air quality conformity purposes. There is no "approved" version of the model with respect to other uses of EMFAC, such as in CEQA documents for RTPs. For example, during the preparation of SANDAG's most recent RTP/SCS, CA Air Resources Board had published the most recent version of EMFAC, but it had not yet been approved for air quality conformity purposes by the US EPA. As a result, the RTP Guidelines should provide guidance for such a situation, since there is likely to be an RTP/SCS update underway when CA Air Resources Board next updates EMFAC. SANDAG suggests editing the original statement to read as follows: "For purposes of air quality conformity, MPOs shall use the most recent version of EMFAC approved by the US EPA. In cases where the CA Air Resources Board has published a new version of EMFAC that has not yet been approved by the US EPA for air quality conformity, MPOs may choose to use that version as part of the RTP/SCS or related analyses, except for air quality conformity."
San Diego Association of Governments (SANDAG)	3.4	50	Chapter 3.4, Page 50 - Reverse the order of the words "is tool" in the first sentence.
San Diego Association of Governments (SANDAG)	3.4	53	Chapter 3.4, Page 53 - Change CMP references to 450.322(d)(3). The CMP reference on page 70 should be changed to 450.322(d)(3), as well.
San Diego Association of Governments (SANDAG)	3.4	58	The federal or state legislative mandate for all modeling requirements should be clearly and specifically identified. For example, on page 58, the guidelines state: "Each MPO model shall include auto operating cost in forecasting the travel. Auto operating cost is a key parameter in various steps of the travel demand model. Auto operating cost shall consist of fuel (primarily gasoline) cost and non-fuel-related costs, including repair, maintenance, tires, and accessories. This shall also include the effective fuel efficiency of the vehicle fleet (SB 375, Chapter 7286)." The RTP Guidelines should cite more specifically where this and other requirements are located in the California Government Code, or similar legislative or regulatory documents. Similar examples of undocumented "shalls" occur on pages 61 and 62 in the description of model components such as TAZ characteristics, trip purpose requirements, and network characteristics. If these are new regulatory requirements, SANDAG requests that the CTC document the intent of these new requirements and why these requirements are necessary at this point in time.
San Diego Association of Governments (SANDAG)	3.6	69	The guidelines list Government Code 65080(b)(1) as a requirement when the plain language of the government code states that "transportation planning agencies with populations over may quantify the following set of indicators with the policy element of their RTP". SANDAG encourages the guidelines to use a consistent standard for the use of words such as "shall", "should", and other mandatory language.
San Diego Association of Governments (SANDAG)	4.4	102	Update CFR reference 450.316 to match the Final Rule text exactly; the addition of "public ports" is out of place.
San Diego Association of Governments (SANDAG)	4.4	103-104	Please provide a more precise description of AB 52 requirements related to tribal cultural resources. The current text does not accurately describe the situations in which lead agencies are required to initiate tribal consultation under AB 52. It may be helpful to reference the discussion on tribal consultations (Chapter 4.9, pages 109-110) here, as well.

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San Diego Association of Governments (SANDAG)	4.10	113	Thank you for the description of SANDAG's TransNet Environmental Mitigation Program (EMP). As part of the description, please note that the EMP is funded by local sales tax dollars.
San Diego Association of Governments (SANDAG)	5.1	117	In the discussion of SB 743, please make it more clear that the proposed changes to the CEQA Guidelines are not yet in effect, and that the timing and location of when the changes will be effective is unknown. The current text does not clearly state what lead agencies should do before the conclusion of a formal rulemaking related to SB 743. Please include clear guidance that lead agencies should refer to (e.g., existing CEQA statutes, regulations, case law) when performing CEQA analysis for their RTPs/SCSs.
San Diego Association of Governments (SANDAG)	5.5	124	Under the "Climate Change/GHG Emissions" section, please make the following revisions: -In the second sentence, when referencing mitigation requirements, please clarify that mitigation is required for "significant" impacts -Please change the third sentence to read as follows: "Each MPO must identify whether the RTP/SCS would result in significant GHG emissions impacts, and identify feasible mitigation measures for significant impacts." -Please delete the last sentence. Contrary to what is implied by this sentence, many MPOs are going beyond the SB 375 consistency analysis in their EIRs.
San Diego Association of Governments (SANDAG)	6.1	133	Please expand upon the recognition of transportation technology and the planning that is occurring for future transportation technologies with examples and best practices, including references to connected and autonomous vehicles. In the second to last paragraph, replace "reduce GHG emissions from passenger travel" to "reduce GHG emissions from passenger vehicles" in order to better align the text with SB 375 requirements. Please add "per capita" before "GHG emissions" in the Policy Element discussion.
San Diego Association of Governments (SANDAG)	6.11	147	Consider changing the second sentence of the first paragraph to the following: "For many reasons, including its proximity to Asian markets and Mexican near-shoring markets, its strong agricultural economy,...". The rail improvement project described in the last two sentences on page 147 seems out of place. Is this an example referring to the sentence prior? There are many other freight technologies and operational changes that are available for implementation in rail modes, as well as highway, maritime, and air.
San Diego Association of Governments (SANDAG)	6.11	148	Consider changing the second sentence to read as follows: "Planning the system involves a broad base of stakeholders, including affected community representatives, local organizations, agencies in charge of seaports and airports, trucking associations, Class I and short line railroads, and freight carriers and shippers."
San Diego Association of Governments (SANDAG)	6.22	170	The first sentence in this section states that CA Air Resources Board will provide updated SB 375 targets for 2020 and 2035 no later than September 2018. Please confirm that CA Air Resources Board will, in fact, provide updated targets for both years. Recent documents from CA Air Resources Board, such as the October 2014 staff report on the target update process and the June 2016 Scoping Plan Update Concept Paper indicate that CA Air Resources Board is only looking to update the 2035 target. The October 2014 staff report can be found here: <a href="http://www.CA Air Resources Board.ca.gov/cc/sb375/staff_report_sb375_targets_update.pdf">http://www.CA Air Resources Board.ca.gov/cc/sb375/staff_report_sb375_targets_update.pdf</a> The June 2016 Scoping Plan Update Concept Paper can be found here: <a href="http://www.CA Air Resources Board.ca.gov/cc/scopingplan/document/2030_sp_concept_paper2016.pdf">http://www.CA Air Resources Board.ca.gov/cc/scopingplan/document/2030_sp_concept_paper2016.pdf</a>
San Diego Association of Governments (SANDAG)	6.24	180	Consider adding an additional appendix (similar to the new Appendix L) highlighting best practices in Social Equity from the MPOs. An example from SANDAG can be found at: <a href="http://www.sdforward.com/pdfs/RP_final/AppendixH-SocialEquityEngagementandAnalysis.pdf">http://www.sdforward.com/pdfs/RP_final/AppendixH-SocialEquityEngagementandAnalysis.pdf</a>
San Diego Association of Governments (SANDAG)	Apx. I	277	Page 277 - Consider expanding the description of Transportation Demand Management (TDM) strategies to include innovative and emerging shared mobility services such as bikeshare, carshare, and on-demand rideshare services.
San Diego Association of Governments (SANDAG)	Apx. I	278	Page 278 - Consider including a link to SANDAG's Regional Parking Management Toolbox among the list of best practice resources for parking and demand management. The Regional Parking Management Toolbox can be found here: <a href="http://www.sandag.org/uploads/publicationid/publicationid_1910_18614.pdf">http://www.sandag.org/uploads/publicationid/publicationid_1910_18614.pdf</a>

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San Diego Association of Governments (SANDAG)	Apx. K	291	Consider a more comprehensive definition of TDM that does not just focus on reducing highway congestion and shifting peak travel hours, such as, "TDM refers to policies, programs, and actions that encourage the use of transportation alternatives to driving alone and reduce vehicle miles traveled".
San Diego Association of Governments (SANDAG)	Apx. L	293	Consider including the Public Health White Paper from SANDAG's RTP, which informed the inclusion of health throughout the Plan, in the Appendix. Also consider including a more in-depth discussion of the determinants of health, as well as incorporating health into all policies. The white paper can be found here: <a href="http://www.sdforward.com/pdfs/RP_final/AppendixQ-WhitePapers.pdf">http://www.sdforward.com/pdfs/RP_final/AppendixQ-WhitePapers.pdf</a>
San Diego Association of Governments (SANDAG)	NA	NA	The Draft 2016 MPO Guidelines purport to be in 'track changes' format, with changes shown in red (red strikethrough indicating deletions and normal red text indicating additions) and unchanged sections from the 2010 Guidelines shown in black. However, there are large sections of the 2010 Guidelines that have been deleted or moved that are not shown in the red strikethrough text. Doing a side-by-side comparison of the final 2010 Guidelines and the draft 2016 Guidelines makes this readily apparent. Reviewers are lead to believe that all changes are shown in red, when in fact, they are not. Either a faithful representation of the changes needs to be presented or reviewers should be instructed to compare the two documents side by side.
Santa Barbara County Association of Governments	NA	NA	<a href="#">Santa Barbara County Association of Governments</a>
School Facilities and Transportation Services Division California Department of Education	NA	108	Last paragraph Add: "Some school districts use a School Facilities Master Plans (SFMP) as a way to compile comprehensive data on the district's long-term facilities including the general location of planned new schools and the expansion, revitalization and reuse of existing schools. A SFMP may also contain Board of Education adopted policies related to joint use and the district's sustainability efforts which can dovetail with community and regional efforts (e.g. infill, reuse, busing, pedestrian/bike safe routes to schools, etc.). Approximately 10% of the state's public schools are charters schools. Many are operated separately from the district and do not have defined attendance areas allowing students from a large geographic area to attend the school. Consultation with charter school operators may provide additional information on future charter school locations and the way charter school students arrive and depart from the school."
School Facilities and Transportation Services Division California Department of Education	NA	183	Last bullet under Transportation strategies Add: "A school district may provide bussing to students based on the distance from a school, other hazards to walking to the school, or other district criteria. Consider opportunities to incorporate existing and planned school district busing to supplement and complement public transit options.  Consider opportunities to protect or improve designated and proposed school district safe routes to school in community wide transportation strategies and investments (e.g. transit improvements bifurcating neighborhoods near schools disrupting pedestrian/bike access)."
School Facilities and Transportation Services Division California Department of Education	NA	276	Transportation Planning and Investment Strategies, item 4 Add: "Consider school districts' facilities master plans and transportation policies in the coordination of regional planning efforts."
Strategic Growth Council/Governor's Office of Planning & Research	1.1	3	This paragraph is fundamental and should be restored and kept in this location at the beginning of the document
Strategic Growth Council/Governor's Office of Planning & Research	1.1	3	Contact Steve Cliff (Air Resources Board) for details and reference: <a href="mailto:Steve.Cliff@CA">Steve.Cliff@CA</a> Air Resources Board.gov

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Strategic Growth Council/Governor's Office of Planning & Research	1.1	3	Changed "nearly forty percent" to "approximately half"
Strategic Growth Council/Governor's Office of Planning & Research	1.1	4	Add "(approximately forty percent from tailpipe emissions alone, and additional emissions from road construction and maintenance, petroleum refining for transportation fuel, and vehicle manufacture)"
Strategic Growth Council/Governor's Office of Planning & Research	1.1	4	Add "And more recently in 2013, the connection between land use planning, transportation infrastructure investment, and greenhouse gasses was strengthened further yet with the passage of SB 743, required an update in CEQA transportation metric towards alignment with climate and planning goals. And more recently,..."
Strategic Growth Council/Governor's Office of Planning & Research	1.1	4	Add "Air Resources Board shows that VMT will have to be kept to a 5.5 percent increase through 2030 in order not to violate the executive order"
Strategic Growth Council/Governor's Office of Planning & Research	1.1	4	Add "Because transportation infrastructure investments have substantial effects on travel patterns, smart investments play a key role in meeting climate targets"
Strategic Growth Council/Governor's Office of Planning & Research	1.1	4	Add "Transportation infrastructure investment affect travel patterns, mode choice, and VMT. Numerous studies show that, generally speaking, investments in roadway capacity increase cause increases in VMT and GHGs, These studies are summarized in materials available on Caltrans' and CA Air Resources Board's websites: National Center for Sustainable Transportation Research Brief: <a href="http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf">http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf</a> "
Strategic Growth Council/Governor's Office of Planning & Research	1.1	5	Add "Air Resources Board Brief: <a href="http://www.CA Air Resources Board.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf">http://www.CA Air Resources Board.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf</a> Air Resources Board Technical Background Document: <a href="http://www.CA Air Resources Board.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_bkgd.pdf">http://www.CA Air Resources Board.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_bkgd.pdf</a> "
Strategic Growth Council/Governor's Office of Planning & Research	1.1	5	Add "Accurate assessment of VMT resulting from transportation infrastructure investments is important for a variety of reasons, including assessing environmental impact, including VMT. In its recent Mobile Source Strategy, the California Air Resources Board has assessed the statewide VMT growth possible without exceeding California's science-based 2030 and 2050 GHG emissions targets. Infrastructure investments in the state should not lead to an exceedance of those GHG levels."
Strategic Growth Council/Governor's Office of Planning & Research	1.2	8	Add "sufficient"
Strategic Growth Council/Governor's Office of Planning & Research	1.2	8	Add "reductions"

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Strategic Growth Council/Governor's Office of Planning & Research	1.2	8	Add "and SB 391"
Strategic Growth Council/Governor's Office of Planning & Research	1.4	12	Assume this will be updated?
Strategic Growth Council/Governor's Office of Planning & Research	1.4	13	Add "SB 743 (Steinberg, 2013) changed transportation analysis in environmental review under CEQA. It requires an update in the metric of transportation impact used in CEQA from Level of Service and vehicle delay .to one that promotes the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. Per CA Air Resources Board Vision Model results, reductions in VMT growth are needed to achieve sufficient GHG emissions reduction for climate stabilization, as reflected in executive orders on 2030 and 2050 GHG targets, The implementation of SB 743 will play a fundamental role in achieving that VMT and GHG reduction. "
Strategic Growth Council/Governor's Office of Planning & Research	1.4	13	We strongly recommend working with OPR to provide in the draft currently under development
Strategic Growth Council/Governor's Office of Planning & Research	1.6	14	This entire section should be updated to reflect FAST Act <a href="http://www.fhwa.dot.gov/fastact/factsheets/metropolitanplanningfs.cfm">http://www.fhwa.dot.gov/fastact/factsheets/metropolitanplanningfs.cfm</a>
Strategic Growth Council/Governor's Office of Planning & Research	1.6	14	Agree-language update needed
Strategic Growth Council/Governor's Office of Planning & Research	1.7	16	Change "Summarizes" to "Acknowledges"
Strategic Growth Council/Governor's Office of Planning & Research	1.7	16	OPR would like to work with Caltrans and the CTC to develop helpful language on 743 for this draft of the RTP Guidelines
Strategic Growth Council/Governor's Office of Planning & Research	2	19	This chapter lists laws, executive orders, policies, and documents that should guide and inform RTP development, but it stops there. It should provide guidance on how to implement those laws, executive orders, policies, and documents in RTPs
Strategic Growth Council/Governor's Office of Planning & Research	2.1	21	There is substantial language in this code that adheres closely with state goals, including public transit usage, active transportation, jobs/housing balance, and VMT, that is not referenced here. It's a long passage, but perhaps a note that there is much more to it than "to reduce growth in traffic congestion"

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Strategic Growth Council/Governor's Office of Planning & Research	2.2	22	This is confusing
Strategic Growth Council/Governor's Office of Planning & Research	2.2	22	We suggest adding to this section how the RTP can achieve alignment with AB 32. Specifically, the state will need to reduce transportation GHGs by 80% by 2050. This is mandated by Executive Order B-16-12
Strategic Growth Council/Governor's Office of Planning & Research	2.2	22	OPR requests the opportunity to work with Caltrans and the CTC to provide best practices on implementing state policy in RTPs
Strategic Growth Council/Governor's Office of Planning & Research	2.2	22	Change "37%" to "approximately half"
Strategic Growth Council/Governor's Office of Planning & Research	2.2	22	Add "(including tailpipe emissions, which themselves comprise 37% of state emissions)."
Strategic Growth Council/Governor's Office of Planning & Research	2.2	23	This is yet to be done, correct?
Strategic Growth Council/Governor's Office of Planning & Research	2.2	23	<p>Add "Governor Brown's executive orders:                      B-16-2012: <a href="https://www.gov.ca.gov/news.php?id=17472">https://www.gov.ca.gov/news.php?id=17472</a>                      Key language:                      "IT IS FURTHER ORDERED that California target for 2050 a reduction of greenhouse gas emissions from the transportation sector equaling 80 percent less than 1990 levels."</p> <p>B-30-15: <a href="https://www.gov.ca.gov/news.php?id=18938">https://www.gov.ca.gov/news.php?id=18938</a>                      Key language:                      1.A new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 is established in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050.</p> <p>2.All state agencies with jurisdiction over sources of greenhouse gas emissions shall implement measures, pursuant to statutory authority, to achieve reductions of greenhouse gas emissions to meet the 2030 and 2050 greenhouse gas emissions reductions targets.</p> <p>6.State agencies shall take climate change into account in their planning and investment decisions, and employ full life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives."</p>

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Strategic Growth Council/Governor's Office of Planning & Research	2.2	24	Add references and links to, and summaries of, Governor Brown's executive orders on climate.
Strategic Growth Council/Governor's Office of Planning & Research	2.2	24	Seems like there are some "shalls" missing, or at the very least, best practices
Strategic Growth Council/Governor's Office of Planning & Research	2.2	24	OPR recommends adding a section describing the connection between transportation infrastructure investments and VMT, expanding on the mention of the research we recommend above. Also, we believe it is critical that The RTP Guidelines include recommendations on reducing the GHG emissions pursuant to executive orders
Strategic Growth Council/Governor's Office of Planning & Research	2.3	24	We suggest providing a more comprehensive list here
Strategic Growth Council/Governor's Office of Planning & Research	2.3	25	Add "prioritize"
Strategic Growth Council/Governor's Office of Planning & Research	2.3	25	Add "investment"
Strategic Growth Council/Governor's Office of Planning & Research	2.3	25	Add "increase walk and bike mode shares and..."
Strategic Growth Council/Governor's Office of Planning & Research	2.3	25	OPR strongly recommends include recommendations for actions to implement this law
Strategic Growth Council/Governor's Office of Planning & Research	2.4	26	What about 49 USC 5303?
Strategic Growth Council/Governor's Office of Planning & Research	2.4	26	Again, will this be updated?

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Strategic Growth Council/Governor's Office of Planning & Research	2.4	26	OPR recommends addition of recommendations that would help MPOs apply federal requirements in a manner that achieves state objectives like GHG reduction, increasing active transportation, reducing agricultural land consumption, etc.
Strategic Growth Council/Governor's Office of Planning & Research	2.6	28	During the General Plan Guidelines outreach process, we heard over and over (and received numerous comment letters) that people want stronger relationships between General Plan and SCS, and better guidance on how to create that relationship
Strategic Growth Council/Governor's Office of Planning & Research	2.7	29	The CTP takes land use as a given. It does not explore the effect of smarter land use patterns on transportation
Strategic Growth Council/Governor's Office of Planning & Research	2.7	29	Add "reflects"
Strategic Growth Council/Governor's Office of Planning & Research	2.7	29	Mention the Smart Mobility Learning Network underway by Caltrans Office of Sustainable Community Planning
Strategic Growth Council/Governor's Office of Planning & Research	2.7	29	Add "the need for access to destination for people and goods"
Strategic Growth Council/Governor's Office of Planning & Research	2.7	31	Add "better transportation mode choices;"
Strategic Growth Council/Governor's Office of Planning & Research	2.7	31	Include guidance on how this might this best be accomplished
Strategic Growth Council/Governor's Office of Planning & Research	2.7	31	Describe best practice programs that combine pavement maintenance and complete street retrofit. An incomplete street should not be repaved and restriped incomplete. Describe strategies and actions necessary to create synergies between maintenance and complete street improvements.
Strategic Growth Council/Governor's Office of Planning & Research	2.7	32	Retain, but replace "to the extent feasible" with "at every opportunity, with particular attention on opportunities for low-cost complete-streets improvements arising out of roadway maintenance"

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Strategic Growth Council/Governor's Office of Planning & Research	2.7	32	Add " taking advantage of opportunities for synergies and cost savings such as restriping when repaving."
Strategic Growth Council/Governor's Office of Planning & Research	2.7	33	Agree-needs update
Strategic Growth Council/Governor's Office of Planning & Research	2.7	34	Helpful description, but also describe how these bear on development of an RTP
Strategic Growth Council/Governor's Office of Planning & Research	2.7	35	This seems to provide useful information. OPR recommends retaining and, if needed, updating this list
Strategic Growth Council/Governor's Office of Planning & Research	2.9	39	agree
Strategic Growth Council/Governor's Office of Planning & Research	2.9	39	FHWA and FTA jointly work on planning
Strategic Growth Council/Governor's Office of Planning & Research	2.9	40	We recommend updating this section
Strategic Growth Council/Governor's Office of Planning & Research	4.1	77	Enhance language on coordination with local general plans
Strategic Growth Council/Governor's Office of Planning & Research	4.1	78	Check 49 USC 5303 for transit consultation requirement as well
Strategic Growth Council/Governor's Office of Planning & Research	4.11	92	This is a bit confusing - if this is a federal program, there are some shalls, but perhaps not as they related to RTPs?

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Strategic Growth Council/Governor's Office of Planning & Research	4.4	82	Word choice?
Strategic Growth Council/Governor's Office of Planning & Research	4.6	85	<b>Update for FAST Act: "Consultation with other planning officials</b> The FAST Act continues to encourage MPOs to consult with officials responsible for other types of planning activities. It adds to the list of such activities tourism and the reduction of risk of natural disasters. (23 USC 134(g)(3)(A))"
Strategic Growth Council/Governor's Office of Planning & Research	5.1	96	Changes in FAST Act can be found here: <a href="http://www.fhwa.dot.gov/fastact/factsheets/metropolitanplanningfs.cfm">http://www.fhwa.dot.gov/fastact/factsheets/metropolitanplanningfs.cfm</a>  And include: Scope of planning process The FAST Act expands the scope of consideration of the metropolitan planning process to include— <ul style="list-style-type: none"> <li>• improving transportation system resiliency and reliability;</li> <li>• reducing (or mitigating) the stormwater impacts of surface transportation; and</li> <li>• enhancing travel and tourism. [23 U.S.C. 134(h)(1)(I) &amp; (J)]</li> </ul> Resilience and environmental mitigation activities The FAST Act expands the focus on the resiliency of the transportation system as well as activities to reduce stormwater runoff from transportation infrastructure. In addition, it newly requires strategies to reduce the vulnerability of existing transportation infrastructure to natural disasters. [23 U.S.C. 134(d)(3) & (i)(2)(G)]
Strategic Growth Council/Governor's Office of Planning & Research	5.1	96	Add "SB 743 (Steinberg, 2013) changed transportation analysis in environmental review under CEQA. It requires an update in the metric of transportation impact used in CEQA from Level of Service and vehicle delay to one that promotes the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. Per CA Air Resources Board Vision Model results, reductions in VMT growth are needed to achieve sufficient GHG emissions reduction for climate stabilization, as reflected in executive orders on 2030 and 2050 GHG targets, The implementation of SB 743 will play a fundamental role in achieving that VMT and GHG reduction. The regulatory language (CEQA Guidelines changes) to implement the law are pending, though Vehicle Miles Traveled (VMT) is the metric identified to determine significant impacts. A future update of the RTP Guidelines will capture any "shoulds" or "shalls" resulting from the formal rulemaking process. "
Strategic Growth Council/Governor's Office of Planning & Research	5.1	96	Again, we strongly recommend working with OPR to provide guidance in this draft
Strategic Growth Council/Governor's Office of Planning & Research	5.3	98	Update for FAST act: <a href="http://www.fhwa.dot.gov/fastact/factsheets/metropolitanplanningfs.cfm">http://www.fhwa.dot.gov/fastact/factsheets/metropolitanplanningfs.cfm</a>
Strategic Growth Council/Governor's Office of Planning & Research	5.7	107	Update
Strategic Growth Council/Governor's Office of Planning & Research	6.1	113	stress consistency with local general plans and zoning as well

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Strategic Growth Council/Governor's Office of Planning & Research	6.23	145	Delete "no later than June 30, 2010 the California Air Resources Board (CA Air Resources Board) shall release draft GHG emissions reduction target for each region and no later than September 30, 2010"
Strategic Growth Council/Governor's Office of Planning & Research	6.23	145	Delete "shall"
Strategic Growth Council/Governor's Office of Planning & Research	6.7	122	Change "condition and performance" to "maintenance"
Smart Mobility, Inc.	3	64	<p>Research done for the California Air Resources Board provides a basis for estimating of the impacts of the road expansion projects on future VMT and GHG. Susan Handy and Marlon Boarnet reviewed the literature on induced travel and concluded:</p> <p>"Thus, the best estimate for the long-run effect of highway capacity on VMT is an elasticity close to 1.0, implying that in congested metropolitan areas, adding new capacity to the existing system of limited-access highways is unlikely to reduce congestion or associated GHG in the long-run."  <a href="http://www.CA Air Resources Board.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf">http://www.CA Air Resources Board.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf</a></p> <p>After bullet point beginning "Consider using feedback loops..." add:</p> <p>"Demonstration that the Travel Demand Model properly accounts for induced demand is of the utmost importance in proper accounting of roadway performance metrics and GHG. This requirement is more critical than many of the other recommendations including the recommendation for Activity-Based Models (ABMs)."</p> <p>In my detailed review of the California ABMs done for the Air Resources Board, I found that the current ABMs fail to account for induced travel any better than the older trip-based models. To date, the added complexity and cost of the ABMs has not been justified by improved regional planning capability. Travel model development should be re-prioritized towards improved accounting of induced travel and better sensitivity of mode shares to land use variables. The question of trip-based models vs. ABM is secondary to these overarching requirements.</p> <p>Then add a new bullet:</p> <p>"The large increases in population forecast throughout California cause the future static assignment models to forecast impossibly high traffic volumes, especially on freeways. This problem makes all future estimates of VMT, VHT and GHG invalid. Added freeway capacity always shows benefits in static assignment models even though research has shown that there likely are no benefits. Replacing static assignment with dynamic traffic assignment (DTA) or microsimulation is recommended."</p> <p>The long-term goal of modelers has been to marry ABM with microsimulation. Microsimulation likely is still impractical (at least in the larger regions), and the travel demand models are still relying on a 50-year old algorithm implemented when computers were much less powerful. DTA offers a practical middle ground for much more realistic estimation of induced travel and roadway metrics that can be implemented today.</p>

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Smart Mobility, Inc.	3	64	<p>Change 1st bullet from:</p> <p>"Consider developing economic, market-based land use models that recognize the effects of transportation on development location."</p> <p>to:</p> <p>"Consider developing land use models that account for the effects of transportation on development location."</p> <p>In my review of land use models for the Air Resource Board, I found that the primary focus in recent land use modeling efforts has been on modeling the economy and prices rather than on induced development. This is problematic in two respects. First, the models are not really successful at modeling the economy and prices. Second, this focus on economics has diverted attention from the critical policy issue of induced land development, and the models do not realistically account for induced land development.</p> <p>If time and money resources are limited, it likely would be better to focus on improved scenario planning tools and efforts, rather than attempting predictive land use modeling. If resources are spent on predictive land use modeling, the issue of induced land development should be emphasized.</p>
Smart Mobility, Inc.	NA	NA	<p>The Plan vs. No Plan framing used in current RTPs and perpetuated in the Draft Guidelines is inadequate for informed planning.</p> <p>Recently-published California RTPs represent a mix of elements. Some of these elements would reduce future VMT and GHG (or at least reduce the growth of VMT and GHG). These elements include more compact mixed-use development, transit investments, bike investments, pedestrian investments and travel demand management activities. On the other hand, the road investments and particularly the freeway investments would increase future VMT and GHG.</p> <p>+R206</p> <p>The RTPs provide performance measures only for the entire package - indicating that the entire package would reduce future VMT GHG relative to a No Plan alternative. This approach is a comparison between two unrealistic scenarios. The No Plan scenario without freeway expansion is modeled as a sprawl scenario, and the Plan scenario with freeway expansion is modeled as a compact land use scenario. This ignores induced development and resulting induced travel.</p> <p>At minimum, a third scenario should be presented that eliminates roadway expansion. For example, the recently finalized SCAG RTP reports a 14.2% increase in regional VMT between 2012 and 2040 for the Plan scenario. The Plan scenario includes a 9.3% in regional lane miles of capacity. Applying the elasticity of 1.0 referenced in my 1st comment page: if no new roadway capacity was added, the expected regional growth in VMT between 2012 and 2040 would drop to only 4.5%. If VMT were to grow by only 4.5%, there would be little or no need for roadway expansion. By 2040, adoption of new autonomous vehicle technologies likely will make added roadway expansion even less necessary.</p> <p>The Draft RTP Guidelines appear to assume that the freeway projects in the Plan are carefully selected by MPO staff based on the individual performance of each project. This is certainly not true. Projects that are planned for and funded for by other entities are placed in the Plan without any careful review. Automatic inclusion of these projects undermines regional planning goals and State of California goals, especially in the area of GHG. If individual roadway expansion projects really are necessary, they should be justified with analysis. Then a fourth scenario could be added to the RTP that includes only this subset of the roadway projects.</p>
Southern California Association of Governments (SCAG)	1.1	4	<p>The end of the first paragraph states that "Modeling undertaken by the California Air Resources Board (CA Air Resources Board) shows that Vehicle Miles Traveled (VMT) will have to be kept to a 5.5 percent increase through 2030 in order to satisfy the Executive Order (i.e. EO B-30-15)."</p> <p>Please note that CA Air Resources Board is still in the process of updating the Scoping Plan and the SB 375 GHG reduction targets for MPO regions considering Executive Orders. The RTP Guidelines should focus on RTPs meeting the current and future updated SB 375 targets and should not state or imply that regions place a cap or target on absolute VMT or on VMT growth.</p>

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Southern California Association of Governments (SCAG)	1.1	4	The text currently reads: "And more recently, in 2015, Governor Brown issued Executive Order B-30-15 establishing a California GHG reduction target of 40 percent below 1990 levels by 2050 which is being addressed through the development of the statewide long-range transportation plan, the California Transportation Plan (CTP) 2040." To be factually correct, it should read: "And more recently, in 2015, Governor Brown issued Executive Order B-30-15 establishing a California GHG reduction target of 40 percent below 1990 levels by 2030 which is being addressed through the implementation of the statewide long-range transportation plan, the California Transportation Plan (CTP) 2040." The RTP Guidelines should also make it clear that the Governor's Executive Order applies to all sectors, not just transportation.
Southern California Association of Governments (SCAG)	1.1	4	The text currently reads: "Transportation infrastructure investment affect travel patterns, mode choice, and VMT. Numerous studies show that investments in roadway capacity increase tend to cause increases in VMT and GHGs." Please revise to read: "Transportation infrastructure investment affects travel patterns, mode choice, and VMT. In general, the guidelines recognize that studies show that investments in roadway capacity tend to cause increases in VMT and GHGs, however, there are exceptions depending on project location and the current transportation network."
Southern California Association of Governments (SCAG)	1.2	5	The text currently reads: "In addition, SB 391 requires Caltrans to update the CTP by December 31, 2015, and every 5 years thereafter." Please revise text to read: "In addition, SB 391 required Caltrans to update the CTP by December 31, 2015, and every 5 years thereafter."
Southern California Association of Governments (SCAG)	1.3	8	Please delete the following sentence: "The latest Federal surface transportation reauthorization bill called the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) was signed into law in 2005." More recent surface transportation bills (MAP-21 and the FAST Act) have been adopted.
Southern California Association of Governments (SCAG)	1.6	16	Regarding the following: "The regulatory language (CEQA Guidelines changes) to implement the law are pending, though VMT has been identified by the Governor's Office as the preferred metric to determine significant impacts." Since implementation details of SB 743 are still pending, the term "preferred" should be revised to "potential."
Southern California Association of Governments (SCAG)	2.3	26	SCAG recommends a broader look at how the transportation system and land use patterns affect public health outcomes beyond active transportation. SCAG included seven focus areas in its 2016 RTP/SCS related to health. 1. Access to Essential Destinations: Improve access for the region to a variety of essential destinations and employment hubs. 2. Affordable Housing: Promote residential infill development with proximity to jobs and essential services in mind. 3. Air Quality: Reduce criteria pollutants and greenhouse gas emissions by reducing vehicle miles traveled (VMT) per capita and supporting clean vehicle technologies and new mobility options. Also, promote reduced exposure to emissions through land use decisions. 4. Climate Adaptation: Support efforts to mitigate climate change and make the region more resilient to future changes with reductions in VMT and greenhouse gas emissions. 5. Economic Opportunity: Support economic activity by providing regional competitiveness and jobs through the construction of transportation projects. 6. Physical Activity: Support increased rates of activity with better access to transit, improved conditions for walking and bicycling, improved access to parks and more compact development patterns. 7. Transportation Safety: Improve transportation safety with increased rates of transit, walkable and bikeable neighborhoods, and improvements to the regional roadway network.
Southern California Association of Governments (SCAG)	2.3	26	SCAG recommends incorporating a broader discussion of how the SCS works in tandem with the RTP to address health issues. This is especially relevant given the new General Plan Guidance by OPR on how cities can incorporate health into their general plans. <a href="https://www.opr.ca.gov/docs/DRAFT_General_Plan_Guidelines_for_public_comment_2015.pdf">https://www.opr.ca.gov/docs/DRAFT_General_Plan_Guidelines_for_public_comment_2015.pdf</a>
Southern California Association of Governments (SCAG)	2.3	26	Definitions for Health in All Policies, Health Equity, and Social Determinants of Health should be included and discussed.
Southern California Association of Governments (SCAG)	2.3	27	SCAG appreciates the strong focus on active transportation and access but would suggest expanding this portion to include additional focus areas. SCAG conducted extensive research on the intersection of the built environment and public health as part of the 2016 RTP/SCS and recommends CTC review this information. <a href="http://scagrtpsc.net/Documents/2016/proposed/pf2016RTPSCS_PublicHealth032816.pdf">http://scagrtpsc.net/Documents/2016/proposed/pf2016RTPSCS_PublicHealth032816.pdf</a>
Southern California Association of Governments (SCAG)	2.3	27	Guidance should be provided on the use of performance measures that can be used to evaluate public health outcomes. Data sources should also be provided.

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Southern California Association of Governments (SCAG)	2.6	30	In the first bulleted list there is no mention of consistency between county-wide LRTPs. Please consider adding "Long Range Transportation Plans (LRTPs)" as part of the list of documents.
Southern California Association of Governments (SCAG)	2.6	32	In the second bulleted list, please consider adding "District System Management Plans (DSMPs)."
Southern California Association of Governments (SCAG)	2.7	36	In the section under Complete Streets, we suggest that commercial vehicles also be recognized as important players within the framework of Complete Streets. Vibrant urban environment cannot function without commercial vehicles delivering goods that sustain the economic activities that take place. Inclusion of commercial vehicles and their operational needs within the context of Complete Streets will provide additional considerations to what safety, street designs, or roadway geometry may mean, thereby complementing and completing the concept it stands for.
Southern California Association of Governments (SCAG)	2.7	36	Please consider adding the following language as referenced from the California Corridor Mobility webpage: "A CSMP results in a listing and phasing plan of recommended operational improvements, Intelligent Transportation System (ITS) strategies, and system expansion projects to preserve or improve performance measures within the corridor."
Southern California Association of Governments (SCAG)	5	NA	Since tiering off from a Programmatic EIR offers several benefits, and yet it has not been widely used by project-level EIRs, we suggest Chapter 5 provide guidance on the use of tiering from a programmatic EIR for the RTP, should the project-level lead agency chooses to use tiering to streamline the EIR process. Sample language regarding tiering: Tiering refers to environmental review of sequential actions, where general matters and environmental effects are examined in a broad EIR for a decision such as adoption of a policy, plan, program, or ordinance, and subsequent narrower or site-specific EIRs are prepared that incorporate by reference the prior EIR and concentrate on environmental effects that can be mitigated or that were not analyzed in the prior EIR. In such instances, the later narrow EIR "tiers" off the prior broad EIR. If a project-specific EIR tiers off from a broader prior EIR such as the Programmatic EIR prepared for a RTP, it could help eliminate repetitive discussions of the same environmental issues; facilitate project-level impact analysis by focusing on issues specific to the later project; reduce the burdens from duplicative reconsiderations of a program, plan or policy with a certified EIR; and reduce CEQA delay and paperwork at project level.
Southern California Association of Governments (SCAG)	5.1	117	Regarding the following statement: "The regulatory language (CEQA Guidelines changes) to implement the law are pending, though VMT has been identified by the Governor's Office as the preferred metric to determine significant impacts. A future update of the RTP Guidelines will capture any 'shoulds' or 'shalls' resulting from the formal rulemaking process." Since implementation details of SB 743 are still pending, the term "preferred" should be revised to "potential."
Southern California Association of Governments (SCAG)	5.4	121	Page 121 references programmatic mitigation as an optional framework in federal environmental reviews "to address the potential environmental impacts of future transportation projects." In addition, the SB 743 Draft CEQA Guidelines and Technical Advisory references the potential use of programmatic approaches for evaluation of VMT impacts. It is suggested that the RTP Guidelines include reference to an option for a programmatic approach to the CEQA analysis of transportation impacts of transportation projects. A programmatic approach need not be required, but should be acknowledged as an option in the RTP Guidelines.

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Southern California Association of Governments (SCAG)	5.5	124	Regarding the following statement: "The transportation sector is a significant source of GHG emissions and therefore the analysis of these emissions indirectly resulting from the implementation of RTPs is especially important to analyze and mitigate." Revise the statement to read: "The transportation sector is one of multiple significant sources a significant source of GHG emissions and therefore the analysis of these emissions indirectly resulting from new growth throughout California the implementation of RTPs is especially important to analyze and for RTPs to mitigate. As a result of cleaner fuel technology, the transportation sector may become a less significant source of GHG emissions in the future."
Southern California Association of Governments (SCAG)	5.5	124	Regarding the following statement: "Each MPO must ... propose feasible and enforceable mitigation measures to reduce or minimize the emissions." RTPs are intended to maximize the use of feasible mitigation measures to reduce or minimize greenhouse gas emissions. As noted in the previous comment, RTPs do not worsen greenhouse gas emissions which are contributed by new growth in the region and throughout California. While we recognize the importance of requiring each MPO to propose feasible and enforceable mitigation measures to reduce or minimize the emissions, it is important to recognize that some MPOs with no implementation authority cannot enforce mitigation measures. However, as permitted by CEQA Guidelines Section 15126.4 (a)(1)(B), MPOs may include performance standards-based mitigation measures in CEQA documents for the RTPs to fulfill the MPOs' CEQA obligations when they act as lead agency for the RTP/SCS. As such, we suggest the aforementioned sentence be revised to state: "Each MPO must ... propose feasible and enforceable mitigation measures to reduce or minimize the emissions, where applicable and appropriate."
Southern California Association of Governments (SCAG)	5.5	124	Regarding the following statement: "Simply demonstrating that an RTP can achieve the GHG reduction targets set by the CA Air Resources Board is not sufficient to conclude that the RTP has no impact on climate change" - As noted in the previous comments, growth has an impact on greenhouse gas emissions. RTPs do not worsen the emissions, and the transportation sector is one of many significant sources of the greenhouse gas emissions. While growth is evitable, the RTPs serve to mitigate climate change impacts to the extent that is feasible and practicable. As such, we suggest the sentence be revised to read: "Given that growth is largely inevitable and the RTP maximizes the use of measures to mitigate adverse impacts from growth, simply demonstrating that an RTP can achieve the GHG reduction targets set by CA Air Resources Board is not sufficient to conclude that the RTP has no impact on climate change."
Southern California Association of Governments (SCAG)	6.11	147	Under the first Goods Movement paragraph, we suggest following changes to positive impacts and negative impacts as currently identified: Consider improvements to truck speed and reliability, freight bottleneck relief, access to goods and product diversity as positive impacts, and add roadway congestion and delays as negative impacts.
Southern California Association of Governments (SCAG)	6.11	147	Under the second Goods Movement paragraph where a revised sentence is inserted, we would like to highlight that, in Southern California, our Ports and individual terminal operators make decisions on deployment of new technologies or implementation of projects that take place within the port properties. We work closely and collaboratively with our Ports, however, MPO's limitations should also be recognized so as not to place non-implementable responsibilities. Regarding the sentence that immediately follows this new insertion- while we agree that moving goods via rail would likely reduce truck emissions, we would like to state that the modal split decisions between rail and trucks are generally driven by goods' consumption points, and are made by either cargo owners or logistics providers. It does not make sense to move goods that are locally consumed via rail as rail movements are more suitable for long-distance trips. Also, in Southern California, much of our freight rail mainline system is shared with commuter rail service. To increase the service frequency for freight or commuter rail requires a careful consideration to balance demand for both services.
Southern California Association of Governments (SCAG)	6.11	148	Regarding Item 5- while the bullet point identifies the region's projected population growth as a factor that affects the demand for goods movement, we would like to provide additional considerations for drivers of goods movement, especially for regions that serve as international gateways. These include national population growth, consumption patterns, manufacturing practices and purchasing power of the region, nation, and the world. These factors influence global supply chain practices, ultimately influencing how goods are moved locally. While we recognize that not all regions in the State deal with global commerce, these are important considerations to be given as we look into our region's and the State's ability to continue moving goods effectively.
Southern California Association of Governments (SCAG)	6.11	148	Regarding Items 4 and 8, we would like to clarify the nexus and subsequent planning considerations between seaport and airport cargo handling capabilities and their implications to the land side freight transportation system. The ability for seaports and airports to handle increased volume of cargo has direct impacts on the volume of cargo that would be moved through the land side infrastructure. Similarly, the land side freight transportation system's ability to handle increased volume of cargo could be a constraint on seaports and airports ability to handle cargo. While the access to these facilities are critical to move goods, the symbiotic relationship between ports capacity and land side capacity should be more clearly identified as an important planning consideration. To this end, Items 4 and 8 could be presented in tandem to highlight the nexus between system bottlenecks and gaps to addressing overall freight transportation system capacity.

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Southern California Association of Governments (SCAG)	6.12	154	Please remove Items 3, 6, and 7. Though military airfields and installations should be consulted as a part of the MPO planning process, it seems premature to require MPOs to take an active role in the planning of these facilities.
Southern California Association of Governments (SCAG)	6.18	163	Please revise this section to note that the Federal Highway Administration is in the process of developing and finalizing the national performance management measure regulations to assess the performance of the National Highway System, Freight Movement on the Interstate System, and the Congestion Mitigation and Air Quality Improvement Program.
Southern California Association of Governments (SCAG)	6.19	166	Please revise this section to reflect the requirements of the Safety Performance Management Measures Final Rule.
Southern California Association of Governments (SCAG)	6.20	180	There should be a suggestion to include disadvantaged groups that are not defined by the traditional parameters of the low income and minority groups, such as groups identified as disadvantaged due to environmental impacts identified under CalEnviroScreen (SB 535). A good place to put it might be in the section on "Social Equity in the SCS."
Southern California Association of Governments (SCAG)	Apx. L	293	These sections should be compiled by topic instead of by MPO to help readers address desired focus areas for inclusion in their RTP/SCSs. In addition, the focus areas are very active transportation heavy. Additional recommended focus areas should be included.
Southern California Association of Governments (SCAG)	NA	NA	<a href="#">Southern California Association of Governments</a>
Southern California Association of Governments (SCAG)	NA	NA	Throughout the document, please review grammar and uses of acronyms to ensure they are consistent in their usage (typically spelled out in full on first instance and consistently – US DOT versus U.S. DOT, AB or Assembly Bill). Please also review references to CA Air Resources Board (sometimes preceded by “the” other times not), the use of % versus percent, the capitalization of State or not, spelling out greenhouse gas or not (GHG), numbering of lists, etc
Southern California Association of Governments (SCAG)	NA	NA	Throughout the MPO guidelines, there is language stating that the RTP should include all of the strategies, actions, and improvements identified in the Caltrans system planning documents (e.g., TCR or CSMP). These statements do not account for fiscal constraints and the fact that the county transportation commissions decide where to program state dollars. Thus, the guidelines should state that these strategies, actions, and improvements are to provide guidance and should be considered in the development of the RTP.
Southern California Association of Governments (SCAG)	NA	NA	Regarding regional needs- It is important to communicate within the guidelines that RTP goals and policies are primarily reflective of local and regional needs, which are developed in consideration of state and federal requirements and recommendations.

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Southern California Association of Governments (SCAG)	NA	NA	Regarding the relationship to state goals- It is equally important to communicate that, while the RTP goals and policies consider state requirements and recommendations, the development of state goals and policies must also consider priorities identified in RTPs.
Stakeholder Group	NA	NA	<a href="#">RTP Guidelines Stakeholder Group Comment Letter (June 29, 2016)</a>
Stakeholder Group	NA	NA	<a href="#">RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)</a>
Stakeholder Group	NA	NA	<a href="#">RTP Guidelines Stakeholder Group Guiding Principles</a>
The Nature Conservancy	NA	NA	<a href="#">The Nature Conservancy</a>
Transportation Solutions Defense and Education Fund	NA	NA	<a href="#">Transportation Solutions Defense and Education Fund</a>
UC Davis	3	1 of 2	<p>1. Section 3.6. Please add an explicit reference to the Federal requirements for AO Conformity Analysis (40CFR93.122(b)) on pg. 69. Your 2016 Draft (no date) quotes the California statute that refers to 23CFR450, which , by looking it up, leads to the requirements for AO Conformity Analysis in 23CFR450.322(1). This subsection then leads to 40CFR93.122(b) , which covers analysis in Serious and Worse Ozone Nonattainment areas. This rule is important because it covers most of the urban counties in California and this AO Conformity Analysis modeling mandate is the only specific requirement for travel demand modeling and for land use modeling in the RTP Guidelines.</p> <p>2. Your RTP Travel Analysis Groupings seem to be incorrect. The Federal Conformity Analysis modeling mandates for Serious and Worse areas applies to SCAG, MTC, and SACOG in that they have one or more counties or parts of counties that are in this classification. It also applies to all 8 counties in the San Joaquin Valley (except E. Kern Co.). Because this rule requires that all SJ Valley counties run network-based travel models, run to equilibrium across all steps , validated against traffic counts, with capacity-sensitive assignment, with peak and non-peak periods, and sensitive to changes in time and costs, you should be explicit about this in your RTP Travel Analysis Groupings. Currently, your Group B.2 leaves out MCAG, MCTC, and KCAG, which fall under the Conformity Analysis rule for Serious and Worse areas. Furthermore, all 8 of the SJ Valley counties fall into the Extreme Ozone Nonattainment Federal category, and so it is unlikely any of them will become Moderate or better in the next 20 years. Please place these three counties into your Group C.2. so that the higher-level modeling requirements and recommendations will apply to them.</p> <p>3. In 3.2.E, I'd keep the Interregional Modeling three paragraphs. Interregional modeling is poorly done in many MPOs and is especially important in the SJ Valley counties . Caroline Rodier at UC Davis has published a paper showing the inaccuracy of intercounty trip projections in some of these county travel models. UC Davis built the current Statewide Travel Model (CSTDM) which Caltrans wanted in order to get better projections of long-distance travel and shipping to use for calibration of MPO models.</p>

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UC Davis	3	2 of 2	<p>4. The draft is weak on discussing the use of land use models. The courts have increasingly required that MPOs utilize land use models, so that their population and employment projections are more accurate. The AO Conformity Analysis rule for Serious and Worse Ozone Nonattainment areas requires that in travel modeling, "Scenarios of land development and use must be consistent with the future transportation system alternatives for which emissions are being estimated." Adequate practice now include the representation of induced travel in regional models and in other analysis methods. Caltrans has done a good job of incorporating this concept in its reports and internal guidance and this phenomenon is quite well documented in research. Induced land development has also been documented in research and has been called for by the relevant NAS panels in recent years. This practice is recommended on the FHWA web site and many courts have invalidated MPO modeling and planning that ignored induced land development. The Big Four MPOs all use formal land use models. Microsimulation models work well with microsim travel models. The language in 3.5 RTP Modeling Improvement Program should be strengthened, changing advisory verbs to mandatory ones, since 6 years have passed since the old 2010 Guidelines were adopted. Also, please bring many of the recommended practices from the 2010 Guidelines, now made mandatory, into the 3.6 Travel Analysis Groupings. Currently, 3.6 is weak. It has lower requirements than what is commonly done in MPOs in each group. I can't take the time to recommend which methods should now be required in each Grouping, but I would at least require the best practice of any one MPO within each group, since there are no deadlines stated.</p> <p>5. The modeling guidelines must require analysis methods necessary for the analysis of Environmental Justice and recommend best practices. EJ analysis is required by both Federal and State law, both in executive orders and in agency rules. I don't have the time (or space on these forms) to go into the details, but have published a TRB paper on this topic.</p> <p>6. Last, I believe that the modeling guidelines should cover the methods recently developed for analysis of the health impacts of transport policies. For example, models that represent walk and bike explicitly and separately can be better used to project Active Transportation activities and then effects on obesity and health. Caroline Rodier at UC Davis has helped develop such methods.</p>
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3	NA	Throughout the document, there are references to off-model tool development that is encouraged. There should be a clear statement that all off-model tools must be documented and available to the public;
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3	NA	It should be clear that every scenario modeled and made available to the public must be consistently modeled and deviations must be well documented with strong rationale;
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3	NA	The groupings used for the RTP modeling levels is not correct; the Valley counties should be required to use higher levels of modeling practice (to be consistent with federal conformity guidelines);
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3	NA	The travel demand modeling community has not kept up with the most recent developments in the practice of modeling reproducibility and open source data. This new guideline should require MPO modelers to make available the data, modeling results and off-model information and assumptions such that any step in the modeling process is reproducible. There are significant funding and health determinations that emerge from these data – the public should be able to reproduce results;

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UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3	NA	MPOs should be required to identify which projects on the RTP are dependent on other projects and identify anticipated staging of RTP projects (i.e., which projects are likely to begin in which years;
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3	NA	Every RTP should have benefit-cost ratio for the RTP, and each project within the RTP should have an approximate benefit to cost assessment completed, and documented as part of the RTP documentation. These results should be directly tied to modeling results for the preferred scenario. The need for individual project assessments can be exemplified by the SCAG RTP. The regional benefit-cost ratio SCAG's 2012 RTP is approximately ~2.5, but the b/c ratio of the Tesoro Extension in Orange County was equal to about 0.5. And yet, because the project was on the RTP, it was aggressively pursued by the Toll Authority. Although it was ultimately cancelled, the entire effort of vetting the project was a waste of public time and resources;
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3	NA	All costs should be part of consideration (e.g., health and environmental) – not just vehicle operating costs;
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3	NA	The land use models are not well defined and required aspects to these models should be further elaborated upon. In particular, close links to affordable housing should be well described. In addition, the process should be expanded to include uncertainty estimates. In its last RTP update, the Puget Sound Regional Council (PSRC), estimated the 80% confidence intervals for its UrbanSim housing projections, both at an aggregate and sub-aggregate level.i,ii PSRC's approach has now been peer reviewed.iii The question of model uncertainty is particularly acute in large urban MPOs that are setting aside specific kinds of development areas, such as Priority Development Areas (PDAs), as a critical means for reducing vehicle miles traveled by concentrating new housing growth in certain transit-oriented places. These specifically defined areas play a critical role in helping regions to achieve SB 375 greenhouse gas (GHG) reduction mandates. For example, the transit priority project (TPPs) areas in the Bay Area include 74% of the PDA acreage and the TPPs were specifically targeted as important areas for emphasizing jobs-housing balances in order to reduce commute distances. Thus, understanding the uncertainties in housing predictions for the PDAs is fundamental to assessing the region's ability to meet the performance targets MTC and ABAG have adopted, including SB 375 mandates relating to GHG targets.
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3	NA	The discussion of social equity and environmental justice considerations contained in the draft guidelines is woefully inadequate and superficial considering the wealth of recent scholarship on the topic. It should be expanded. I have reviewed the proposed chapter prepared by Richard Marcantonio and strongly support its inclusion. In general, current MPO equity analysis practice tends to obscure, rather than illuminate, potential disproportionate and adverse effects on protected populations. But this does not need be the case. A paper by Alex Karner, just published in the journal Transport Policy,iv uses the 2011 RTPs prepared by all eight San Joaquin Valley MPOs as data to develop concrete recommendations and best practices that can be used to improve the consistency between equity analyses and real-world impacts. The ecommendations developed by Karner involve altering analytical choices rather than estimating new models or acquiring expensive datasets. As such, they can be implemented even in regions with few resources.
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3.2	57	<p>This sentence makes no sense; it says 'tools' are used as 'tools'. Please clarify.</p> <p><b>Transportation planners and engineers utilize various transportation analysis tools (models) as both policy and technical tools during the regional transportation planning process.</b></p> <p>This section in general is confusing. Is it supposed to be making the case for the modeling tools? I don't understand how policy tools provide a "clear explanation of the model and analytical techniques."</p> <p>Under the technical tools section, there seems to be a mixing of project-level and regional level modeling approaches. It would be very inappropriate to use a regional travel model for a project-level analysis. I would certainly not expect a regional model to be used to assess/prioritize project-level operational or management alternatives. The intent of this section should be clarified.</p>

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UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3.2	59	There are numerous grammatical errors and missing words throughout this document. One example appears here,  For MPOs to affect the emissions from interregional travel and share responsibly for reducing those emissions with bordering regions, it is critical that they have the ability to accurately capture VMT <b>associate</b> with interregional travel trips.
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3.4	60	Model consistency is not defined. There should be defined quantitative measures for acceptable consistency. For example, SCAG has consistency requirements for sub-area modeling which specify quantitative levels of acceptable divergence from estimates produced by the regional model.  Is the word ‘encourage’ meaningful in these statements? It would seem that these should be clear requirements, * The same land use used in the RTP modeling is encouraged [emp added] to be used in the impact assessment for the No Action alternative, the Proposed Plan alternative, and the Environmentally Preferable Alternative. * Assumptions, model inputs, data, and methodologies are encouraged [emp added] be the same for modeling for federal air quality conformity and for SB 375 GHG emission reduction targets. The results provided to the federal government for ozone, carbon monoxide, particulate matter and nitrogen dioxide are encouraged come from the same emissions model run as the GHG emissions provided to CA Air Resources Board  Under what circumstances would differing land use assumptions or different inputs/data and methodologies be acceptable?  Note also that there are missing words and confusing statements in the last two bullets, * MPOs are encouraged strive to use common data definitions, sources, and performance measures for date including but not limited to population, employment and house estimates, and provides, labor force ages, and VMT. * Post-processing of modeling results can be accompanied the modeling limitations being overcome and how the limitations were identified.
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3.4	61	The text under the modeling assumptions section seems to imply that only some (i.e. “key”) assumptions must be documented. All assumptions should be documented.  It should also be made clear that any factor that is not expressly modeled (e.g., race) cannot be used in any analyses that relies on the forecasted results.
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3.4	62	Please define ‘reasonable’ here (e.g., would it be considered ‘reasonable’ to run scenarios of all transit improvements)? The language used below would seem to preclude developing scenarios that focus on full investments in modes other than SOV.  The conformity determination must include reasonable assumptions about transit service and increases in transit fares and road and bridge tolls over time (40 CFR 93.110)  The boundaries of the application of the model are expressly derived by the limitations of the data as input. For example, if the greatest trip is 5 mi, then modeling results should not be considered reliable for any trip length greater than 5mi. The boundaries of the data used in each step of the modeling process should be documented.  All off-models should be made publicly available and the data be of the quality that replication of results can be achieved. Consider providing an explanation of what model limitations are being overcome and how the limitation are defined along with the post- processing results.

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UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3.4	64	Model Calibration/Validation All factors and parameters that are calibrated should be documented and results of validation at each step should be provided. Observed and modeled speeds and volumes should be provided for each link in data form and publicly available.
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3.4	65	MPOs should provide the results of backcasting efforts in data form and these should be made publicly available.
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3.4	66	Please define 'reasonable', Scenarios of land development and use must be consistent with the future transportation system alternatives for which emissions are being estimated. The distribution of employment and residences for different transportation options must be reasonable (40 CFR 93.122(b)(1)(iii));
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3.4	67	Please describe how calculation of model elasticities conforms to assessing model sensitivities, Disaggregate checks, such as the determination of model elasticities, are performed during model estimation.
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3.4	70	Peer reviews should include specialists familiar with travel models who do not have a conflict of interest (i.e., are independent of groups working on travel models for the state or the particular agency), Furthermore each agency is encouraged to formally seek out peer reviews from Californian transportation modelers including other agencies of similar size during model development and during forecasting at least every 10 years or after a major modeling enhancement. In addition to the review by peers, agencies are also encouraged to utilize FHWA's Travel Model Improvement Program peer review process.
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	3.4	77	How does the average size of an individual TAZ actually get calculated? TAZ structure is important for any travel demand model and it should contain homogenous land use as much as possible. The average population in each TAZ should be between 1200 and 3000 and it should not generate more than 15000 person trips per day. The average size of each TAZ should be between 0.25 and 1 square miles
UC DAVIS College of Engineering Department of Civil and Environmental Engineering	NA	NA	<a href="http://www.universityofcalifornia.edu/davis">University of California, Davis</a>

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US EPA Region IX	NA	NA	<p>FAST Act Provisions/Federal Requirements</p> <p>The FAST Act includes several provisions affecting the planning process. EPA recommends that the RTP Guidelines direct MPOs and RTPAs to identify how the RTPs are meeting the goals and objectives of these provisions. Programmatic mitigation plans and identifying mitigation opportunities available to reduce impacts are important elements of an RTP.</p> <p>We note that Title 23 USC 134 states that a long-range transportation plan “shall include a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan” and that the discussion of mitigation “shall be developed in consultation with Federal, State, and tribal wildlife, land management, and regulatory agencies.” This should be noted as a “shall” in the RTP Guidelines.</p>
US EPA Region IX	NA	NA	<p>Analysis of Climate Change Impacts</p> <p>The Council on Environmental Quality (CEQ) has released final guidance (&lt;&lt;Insert link to Federal Register notice due Aug. 5th, 2016) for Federal agencies on how to consider the impacts of their actions on global climate change in their National Environmental Policy Act (NEPA) reviews. This final guidance provides a framework for agencies to consider both the effects of a proposed action on climate change, as indicated by its estimated greenhouse gas emissions, and the effects of climate change on a proposed action. While EPA understands that RTPs are not subject to NEPA, EPA recommends that MPOs refer to this guidance because transportation projects within the RTP may receive federal funds at some point in the future and referring to this guidance in the development and analysis of the RTP will be helpful. EPA notes that the CEQ website for the guidance also links to a list of greenhouse gas accounting tools.</p>
US EPA Region IX	NA	NA	<p>Environmental Justice and Title VI of the Civil Rights Act</p> <p>Elements of an RTP may have the potential for localized public health and environmental impacts to surrounding communities which may include environmental justice (EJ) populations. EPA recommends the Draft PEIS consider the potential for any associated disproportionate adverse impacts and benefits to minority and low-income populations that may occur as a result of recommended projects in the RTP. Further, recipients of federal assistance, which in addition to funding may include the sale, lease or use of federal property, have an obligation to ensure that their programs do not result in discriminatory effects or burdens on populations protected under the Civil Rights Act. Because projects within the RTP may receive federal funding in the future, it is important to include a discussion of possible impacts, and measures to address them, in the RTP</p>
US EPA Region IX	NA	NA	<p>Health Considerations</p> <p>As written, the Draft RTP Guidelines are heavily focused on active transportation and what actions MPOs and RTPAs are taking to promote health. EPA recommends that the RTP Guidelines also address the impact of transportation networks (current and proposed) on health. Chapter 2.3 page 26 title “Promoting Health” should be revised to read “Promoting Health and Pursuing Better Health Outcomes” to accommodate this important perspective.</p> <p>Please consider including the following:</p> <p>RTPs should: 1) Identify the current near-roadway health impacts from the existing transportation system (for example, where are there high volume freight corridors adjacent to communities? Where, and at what time, are there conflicts between agricultural trucking and communities?); 2) Identify how the proposed transportation network (new roadways and legacy projects that have been in the RTP for several years) was designed to minimize near-roadway health effects to communities; and 3) Identify specific mitigation measures that the MPO or RTPA is taking to reduce health impacts from the transportation sector.</p>

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US EPA Region IX	NA	NA	<p>Air Quality Impacts                      Reducing emissions is critical to achieving improved health outcomes and meeting air quality standards. Section 5.7 should be revised to include a discussion of air quality impacts and measures to reduce those impacts (rather than just focusing on conformity). The regional planning process provides an excellent forum to promote measures to improve health and reduce emissions.                      Please consider including the following:                      RTPs shall discuss the public health impact associated with the operations of on-highway, nonroad, marine and locomotive equipment and seek to promote the implementation of the lowest emission technologies available to provide the needed utility for a proposed transportation network. SCAG included a comprehensive list of air quality mitigation measures in the PEIR for the 2012-2035 RTP/SCS, and these should be noted in the best practices section. RTPs shall 1) Identify how the transportation network has been designed to accommodate, and promote, new technology, alternative fuels, charging stations, and zero-emission technology. Include a discussion about incentives and implementation of these measures. 2) Identify how the proposed transportation network is meeting the goals and objectives of the Zero Emission Vehicle Action Plan.</p>
US EPA Region IX	NA	NA	<p>Please include these recommendations as “best practices” for MPOs to highlight for project proponents who will ultimately construct and operation projects in the RTP:                      Deploy Low Emission Technologies for NEPA Project Construction &amp; Operation</p>
US EPA Region IX	NA	NA	<p>Definition of “clean truck”                      US EPA suggests defining the term “clean truck” in relation to current vehicle emissions standards. One option for defining this technology would be to compare it to the US EPA exhaust emission standards for model year 2010 and newer heavy-duty on-highway engines, or the CCA Air Resources Board optional low NOx emission standards for on-road heavy-duty engines.  <a href="http://www3.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm">http://www3.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm</a>  <a href="http://www.CA Air Resources Board.ca.gov/msprog/onroad/optionnox/optionnox.htm">http://www.CA Air Resources Board.ca.gov/msprog/onroad/optionnox/optionnox.htm</a></p>