

DRAFT 2016 Regional Transportation Plan Guidelines - Comments Log

Organization	Chapter	Ch. Page	Comment	Staff Response
American Cancer Society Cancer Action Network	2.6	30	Include local public health plans, such as the Community Health Improvement Plans required under public health department accreditation, among the locally prepared documents considered in Section 2.6, "Consistency with other planning Documents." These plans almost always include content on local collaborative efforts to address obesity and promote physical activity	Comment incorporated
American Cancer Society Cancer Action Network	2.7	30	Include in Section 2.7 and 6.13 on Active Transportation, Safe Routes to School, a public health strategy connecting communities to schools, that includes but is not limited to child safety, reducing traffic congestion, sidewalks, crosswalks and bike lanes. Efforts like Safe Routes to School should be included in discussions on complete streets and active transportation. Also, include additional language about the state Active Transportation Program (ATP). Adequate funding is needed to promote more walkable and bikeable communities, and ATP is the primary source of funding for walking and bicycling in the state.	Comment incorporated
American Cancer Society Cancer Action Network	2.10	43	Enhance discussions of equity, perhaps through an equity dedicated chapter, to include content on the following topics. Integrate the equity topics below into the RTP Checklist (Section 2.10, Appendix C). Environmental justice Ensuring active transportation, transit, and other transportation investments are coupled or coordinated with anti-displacement policies and protections that stabilize housing market conditions for vulnerable residents. The systematic consideration of disadvantaged communities and public health disparities in the prioritization of transportation investments The potential for strategically implemented regional transportation policies to support economic empowerment in vulnerable communities, such as through the priorities of transit and active transportation infrastructure that connects such communities to job opportunities or through local hiring practices for transportation projects in vulnerable communities	Comment incorporated
American Cancer Society Cancer Action Network	3	46	Throughout Chapter 3, "Regional Transportation Plan Analysis and Modeling," integrate public health and equity impacts into scenario modeling and enhance incorporate of active transportation variables into models, as exemplified by the Integrated Transport and Health Impact Modelling (ITHIM) tool	
American Cancer Society Cancer Action Network	4	97	ACS CAN enthusiastically supports efforts to promote public participation in RTPs as described in Chapter 4, "RTP Consultation and Coordination," including those required under Title 23 CFR (Code of Federal Regulations) part 450.316, such as the use of convenient meeting times, convenient locations, and language access. Such approaches could be enhanced by including Guideline recommendations that promote language-appropriate outreach to vulnerable communities, expand public comment periods beyond the 45-day minimum, and call for the formation of a community-focused equity and environmental justice advisory group to provide early and ongoing visioning and input	Comment incorporated
American Cancer Society Cancer Action Network	4.1	99	Strengthen promotion of the presence and participation of public health stakeholders in regional transportation conversations. The Guidelines should require, or at least strongly recommend, engagement with public health departments and public health non-governmental organizations to enhance the potential of Regional Transportation Plans (RTP) to promote community health.	Comment incorporated
American Cancer Society Cancer Action Network	4.4	102	Strengthen promotion of the presence and participation of public health stakeholders in regional transportation conversations. The Guidelines should require, or at least strongly recommend, engagement with public health departments and public health non-governmental organizations to enhance the potential of Regional Transportation Plans (RTP) to promote community health.	Comment incorporated
American Cancer Society Cancer Action Network	Apx. L	293	Enhance Appendix L to include or augment examples of the health promoting approaches below. Integrate these health promoting concepts into the RTP Checklist (Section 2.10, Appendix C). Improving connectivity between regional transit modes and active transportation infrastructure Improving the regional, inter-city connectivity of the complete street networks and active transportation infrastructures, particularly bikeways Improving the completeness of neighborhoods, particularly those around regional and local transit modes and active transportation infrastructure, through various means, such as zoning or incentives. Neighborhood completeness is enhanced when key community assets, institutions, resources, and services are located in or near neighborhoods, which increases opportunities for trips taken by active transportation.	In process of incorporation
American Cancer Society Cancer Action Network	NA	NA	RTPs should closely align with the state's Sustainable Freight Action Plan guiding principles to ensure that cleaner air and reduction in carcinogenic diesel emissions from the freight sector are considered. Diesel exhaust from the freight sector is responsible for approximately \$20 billion in health damages annually in California. Communities must be better protected from local pollution from the freight sector	Comment incorporated
Association of Monterey Bay Area Governments	2.2	24	The comment that transportation represents half of GHG emissions is misleading.	Comment incorporated
Association of Monterey Bay Area Governments	2.3	26	Paragraph 3 – Data/evidence to support such broad statements and conclusions is needed regarding the link between access and overall public health.	Comment incorporated
Association of Monterey Bay Area Governments	3	46	Chapter 3 (Modeling) needs to be revised to address what is required by statute (shall) and recommendations (should). Many of the "shalls" included in this section are not required by statute and they need to be identified as recommendations instead. This chapter needs to also include a discussion of the different types of modeling tools and resources used across the various California MPOs. Previously, this chapter had requirements and recommendations that were based on statute and what was reasonable given the capacity for small and large sized MPOs. The changes to this chapter have dramatically increased the modeling requirements for RTPs which would have a huge cost and resources impact that smaller MPOs such as AMBAG cannot meet.	
Association of Monterey Bay Area Governments	3	46	Chapter 3 – The entire modeling chapter has become too prescriptive and needs to be revised to include statute requirements and recommendations.	
Association of Monterey Bay Area Governments	5.5	122	Growth Related Impacts – Need to clearly define and detail what data is sufficient to conclude that RTP has no effect on climate change.	Comment incorporated
Association of Monterey Bay Area Governments	6.11	147	Chapter 6, Section 11 – Need to reference California Freight Mobility Plan.	Comment incorporated
Association of Monterey Bay Area Governments	6.13	157	Need to define "low stress" trips.	Comment incorporated
California Air Resources Board	1	1	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.) 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. See attachment.	Comment incorporated and performance measures are addressed in Chapter 7; workgroups will further discuss incorporation of comments

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CA Air Resources Board	1.1	3	Change "is evolving" to "has evolved"	Comment incorporated
California 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)	Comment incorporated and performance measures are addressed in Chapter 7; workgroups will further discuss incorporation of comments
CA Air Resources Board	1.1	3	Change "recommends that State shall" to "directs state agencies to"	Comment incorporated
CA Air Resources Board	1.1	3	Delete section 1.1 paragraphs 1, 2, 4, 5, 6, 7, 8, 9	Comment incorporated and performance measures are addressed in Chapter 7
California 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.	Comment incorporated and performance measures are addressed in Chapter 7
California 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).	Comment incorporated and performance measures are addressed in Chapter 7
CA Air Resources Board	1.1	4	Add "integrated land use planning" and "to achieve"	Comments from multiple stakeholders requested that this language be removed for modified
California Air Resources Board	1.2	5	1.2 Performance Measurement to Reflect Goals Insert completely new 1.2 sub-chapter, title, and add: (paragraph 5 of 6) 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."	Comment incorporated and performance measures are addressed in Chapter 7; workgroups will further discuss incorporation of comments
California 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.	Comment incorporated and performance measures are addressed in Chapter 7; workgroups will further discuss incorporation of comments
California Air Resources Board	1.2	5	Change 1.2 sub-chapter to 1.4	Performance measures are addressed in Chapter 7; workgroups will further discuss incorporation of comments
California Air Resources Board	1.2	5	Insert completely new 1.2 sub-chapter, title, and add: (paragraph 1 of 6) 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. Clearly established state goals include: <ul style="list-style-type: none"> • Greenhouse gas reduction • Improved air quality • Natural resources protection • Smart growth (sustainable land use development) • Affordable housing • Jobs/housing balance • Social equity • Economic development • Safety and security 	Performance measures are addressed in Chapter 7; workgroups will further discuss incorporation of comments

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California Air Resources Board	1.2	5	1.2 Performance Measurement to Reflect Goals Insert completely new 1.2 sub-chapter, title, and add: (paragraph 2 of 6) 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."	Performance measures are addressed in Chapter 7; workgroups will further discuss incorporation of comments
California Air Resources Board	1.2	5	1.2 Performance Measurement to Reflect Goals Insert completely new 1.2 sub-chapter, title, and add: (paragraph 3 of 6) 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.	Comment incorporated and performance measures are addressed in Chapter 7; workgroups will further discuss incorporation of comments
California Air Resources Board	1.2	5	1.2 Performance Measurement to Reflect Goals Insert completely new 1.2 sub-chapter, title, and add: (paragraph 4 of 6) 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.	Performance measures are addressed in Chapter 7; workgroups will further discuss incorporation of comments
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."	Comment incorporated
CA Air Resources Board	1.2	6	Add "FHWA is still in the process of finalizing the rules for implementation of..."	Comment incorporated
California Air Resources Board	1.3	6	1.3 Performance Measures Insert completely new 1.3 sub-chapter, title, and add: (paragraph 4 of 4) BEST PRACTICES for performance measurement The following documents contain best practices for performance based planning, and should be referenced in the RTP Guidelines. <ul style="list-style-type: none"> • 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. http://www.transformca.org/resource/creating-healthy-regional-transportation-plans • The Nature Conservancy report entitled "Sustainable Communities Strategies and Conservation" includes model policies and best practices for conservation policies in SCSs. http://www.southernsierrapartnership.org/scs-policy-report.html • US DOT: Management & Operations in the Metropolitan Transportation Plan: A Guidebook for Creating an Objectives-Driven, Performance-Based Approach http://www.ops.fhwa.dot.gov/publications/moguidebook/index.htm • FHWA Model Long-Range Transportation Plans: A Guide for Incorporating Performance Based Planning (2014) http://www.fhwa.dot.gov/planning/performance_based_planning/mlrtp_guidebook/ 	Performance measures best practices are incorporated in the new Appendix M.
California 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"> • GHG emissions reduction • Accessibility • VMT reduction • Public health/air quality • Connectivity • Mobility (including transit and active transportation mode shift) • Equity (including affordable housing) • Prosperity (including job creation, cost savings) • Land conservation (including more compact urban form) • Infrastructure investment priorities • System reliability and safety 	Performance measures are addressed in Chapter 7; workgroups will further discuss incorporation of comments
California 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.	Performance measures are addressed in Chapter 7; workgroups will further discuss incorporation of comments
California 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.	Performance measures are addressed in Chapter 7; workgroups will further discuss incorporation of comments
CA Air Resources Board	1.3	7	Add "There..."	Comment incorporated
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."	Comment incorporated

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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."	Comment incorporated
CA Air Resources Board	1.4	11	Add "land use and..."	Comments from multiple stakeholders requested that this language be removed for modified
CA Air Resources Board	1.4	11	Add "non-auto mobility strategies, and land use projections..."	Comments from multiple stakeholders requested that this language be removed for modified
CA Air Resources Board	1.4	12	Add "and future growth patterns;"	Comment incorporated
CA Air Resources Board	1.4	12	Add "and land use policies"	Comments from multiple stakeholders requested that this language be removed for modified
CA Air Resources Board	1.4	12	Add "has been identified by the Governor's Office as the preferred metric"	Comments from multiple stakeholders requested that this language be removed for modified
CA Air Resources Board	1.4	12	Add "and land use"	Comments from multiple stakeholders requested that this language be removed for modified
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."	Comments from multiple stakeholders requested that this language be removed for modified
CA Air Resources Board	1.6	13	This should also mention that there are public participation requirements in state law, SB 375	Comment incorporated
CA Air Resources Board	2.1	22	Add "EO B-30-15"	Comment incorporated
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	Comment incorporated - added a paragraph on public health to the Introduction, Section 1.1
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?	Comment Acknowledged
CA Air Resources Board	4.2	78	Add "California Government Code section 65080(b)(2)(E)"	Comment incorporated
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?	Comment acknowledged
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?	Comment incorporated
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."	Comment incorporated
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."	Comment incorporated
CA Air Resources Board	4.10	90	Change "Game" to "Wildlife"	Comment incorporated
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.	Comment incorporated
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."	Comments from multiple stakeholders requested that this language be removed for modified
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."	Comment incorporated

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CA Air Resources Board	6.1	112	Add "and land use"	Comments from multiple stakeholders requested that this language be removed for modified
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."	Comment incorporated
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."	Comment incorporated in Section 6.19
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"	Comment incorporated
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."	Comment incorporated
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. "	Comment incorporated
CA Air Resources Board	6.1	113	This language in this section did not match what's in the statute, so I revised it	Comment incorporated
CA Air Resources Board	6.7	123	The following aren't really "modes" (e.g. highways, good 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.	Comment Acknowledged
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.	Comment incorporated
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.	Comment incorporated in Chapter 7 - in process of adding more background on national performance measures.
CA Air Resources Board	6.23	146	Add "September 2018"	Comment incorporated
CA Air Resources Board	6.23	146	Add "update to"	Comment incorporated
CA Air Resources Board	6.23	146	Add "In 2010, the first targets were..."	Comment incorporated
CA Air Resources Board	6.23	146	CA Air Resources Board will add more language about the upcoming target setting process.	Comment incorporated
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.	Comment incorporated
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)"	Comment incorporated
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).	Comment incorporated
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."	Comment incorporated
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)	Comment incorporated

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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)]"	Comment incorporated
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."	Comment incorporated
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)."	Comment incorporated
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).	Comment incorporated
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, RTPs 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	Comment incorporated
CA Department of Public Health	1	13	Recommendation: Replace the term "citizen" with "resident" or "community member" 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." (pgs. 13, 79, 84, 125)	Comment incorporated
CA Department of Public Health	2	22-23	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. 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. 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.	Comment incorporated
CA Department of Public Health	3	79	Recommendation: Replace the term "citizen" with "resident" or "community member" 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." (pgs. 13, 79, 84, 125)	
CA Department of Public Health	3	84	Recommendation: Replace the term "citizen" with "resident" or "community member" 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." (pgs. 13, 79, 84, 125)	
CA Department of Public Health	4	97	Recommendation: Strengthening the engagement of communities most affected by health inequities, especially communities of color. 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. 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. 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 promotor/a 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.	Comment incorporated
CA Department of Public Health	5	125	Recommendation: Replace the term "citizen" with "resident" or "community member" 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." (pgs. 13, 79, 84, 125)	Comment incorporated

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CA Department of Public Health	Apx. L	293	Suggested Outline: Appendix L (in compliance with AB411)	Comment incorporated
CA Department of Public Health	NA	NA	<p>Suggestions for Process and Logistics Request: Extend timeline for RTP and CTP Guidelines finalization.</p> <p>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>	Comment Acknowledged
CA Department of Public Health	NA	NA	<p>Suggestions for General Content Recommendation: Strengthen context and improve usability.</p> <p>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>	Comment incorporated
CA Department of Public Health	NA	NA	<p>Recommendation: Improve transparency (peer review and open data) and provide examples of best practices in modeling to capture health impacts.</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>	Comment Acknowledged
CA Department of Public Health	NA	NA	<p>Recommendation: Include public health in lists of stakeholders to consider for coordination and collaboration.</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>	Comment incorporated
CA Department of Public Health	NA	NA	<p>Recommendation: Enhance information about strategies and best practices for effective cross-sectorial coordination and collaboration.</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>	Comment incorporated
California Association of Councils of Governments	3	46	<p>Federal and State Requirements Differ by MPO Size and Region.</p> <p>The guidelines must clearly identify where requirements differ by MPO. Chapter 3: Modeling would benefit from a clear distinction of requirements by MPO size, region, etc. We have identified approximately 5 sections, covering roughly 20 pages, where this occurs. One example, Chapter 3, Section 3.4 - "Regional Travel Demand Modeling consistency and quality control is tool used to determine a regions air quality conformity status and to effectively implementing SCS. The conformity 40 CFR 93.105 requires that an interagency consultation process involving MPOs, State and local air quality planning agencies, State and local transportation agencies, EPA, and the USDOT..." This section fails to identify that interagency consultation requirements, as referenced, are requirements of nonattainment MPOs only. Attainment MPOs are not subject to the requirements of 40 CFR 93.105.</p> <p>We are happy to coordinate with you to provide language for inclusion in the guidelines.</p>	
California Association of Councils of Governments	3	47	<p>Modeling Chapter Goes Beyond Requirements with No Recognition of Size or Cost.</p> <p>The modeling chapter is trying to do too much. As a result, its structure does not match the rest of the document. The current version is a hodgepodge of federal and state requirements, transportation research board studies, and other research. The RTP Guidelines, however, are a regulatory document to the extent that RTPs must be consistent with the "shalls." To be sure, the Guidelines should encourage regional transportation planning agencies to stay abreast of and implement best current practices when applicable and feasible. But including an overview of the current state is over-reach. This information is better in a stand-alone document that is referenced in the Guidelines.</p> <p>We recommend discussions regarding industry practices and professional studies be drafted in a stand-alone document that is either cross-referenced in the draft or included in an appendix. This structural change will reduce duplication and provide clarity on what is required per statute, what is recommended by statute, and what is recommended based on best practices. We appreciate the work already underway to address comments raised at the 1st working group meeting around this topic and encourage a complete revision consistent with this approach</p>	
California Association of Councils of Governments	3.4	51, 159	<p>ARB's Mobile Source Strategy.</p> <p>There are several indirect references to VMT reductions contained in ARB's Mobile Source Strategy. The first reference appears on page 4 of the draft guidelines - Modeling undertaken by the California Air Resources Board (ARB) shows that Vehicle Miles Traveled (VMT) will have to be kept to a 5.5 percent increase through 2030 in order to not violate the executive order. Additional references are contained on pages 5 and 16.</p> <p>References to the Mobile Source Strategy should be rewritten to reflect the following:</p> <p>a. ARB used the VMT reduction as a proxy for GHG reductions (e.g. the Mobile Source Strategy goals reflect VMT and/or GHG reductions).</p> <p>b. Reductions are anticipated to be achieved from SB 375 plus non-SB 375 strategies and reductions. This is articulated in the second full paragraph on page 51 of the Mobile Source Strategy.</p> <p>We recommend the following language to assure that the approach in the Guidelines is consistent with the approach taken by the Air Resources Board in the Mobile Source Strategy (Page 51 and Figure 19, page 159): SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt Sustainable Communities Strategies that integrate land use and transportation planning to achieve passenger vehicle GHG emission reductions. Per capita GHG emission reduction targets for each MPO are established by ARB. The 15 percent reduction in light-duty VMT in 2050 included in the Cleaner Technology and Fuels scenario provides a top-down framework for how transportation efficiencies can put California on a trajectory to meet climate goals. ARB and the MPOs will be working on a comprehensive bottom-up process to update SB 375 targets. MPO recommendations will be considered as part of the SB 375 target setting process, along with broader policy recommendations to achieve the overall VMT and/or GHG reductions identified in the scenario as part of the Scoping Plan Update.</p>	

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California Association of Councils of Governments	5.1	117	Senate Bill 743 and Federal Performance Measure Guidelines Are Still in Development. Putting performance measures related to information included in draft SB 743 Guidelines is putting the performance cart before the regulatory horse. The SB 743 guideline development process is not complete. The guidelines should reflect the requirements of the statute and not an incomplete guideline/rulemaking process. In the context of the guidelines, this is compliance with CEQA. We believe Section 5.1 of the guidelines adequately reflects CEQA requirements.	Comment incorporated
California Association of Councils of Governments	5.5	124	Climate Change and CEQA. To recognize the discretion lead agencies have in determining thresholds of significance under CEQA, the following text (page 124) should be removed from the guidelines: "Simply demonstrating that an RTP can achieve the GHG reduction targets set by ARB is not sufficient to conclude that the RTP has no impact on climate change." The text provided in the preceding sentences provides an appropriate reference to the required CEQA process. The RTP Guidelines should not be written to trump the CEQA Guidelines.	Comment incorporated
California Association of Councils of Governments	6.16	161	Transportation Projects Exempted from Senate Bill 375. We are unsure why the text contained on page 161 of the guidelines was stricken. Projects programmed for funding in sales tax expenditure plans reflect multi-year programs of projects. References to California Government Code Section 65080 (b)(2)(L) should remain.	Comment incorporated
California Cleaner Freight Coalition	1.1	4	The Draft RTP Guidelines should be edited to include the following language after the first paragraph on page 4: In addition, the executive order recommends that the State shall Executive Order B-32-15 also directs State agencies to take climate change into account in planning and investment decisions, and employ full life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives. Planning and investment shall be guided by the following principles: As a result of state legislation and executive orders, GHG emission reduction, transportation electrification, and climate resilience have also has become one of the key priorities in the statewide and regional transportation planning process in addition to improving transportation mobility, addressing federal air quality criteria pollutants and ensuring that the statewide regional transportation system addresses tribal, local, regional, and statewide mobility and economic needs.	Comment incorporated in Section 1.1 and 2.2
California Cleaner Freight Coalition	1.1	4	Add and Delete language: As a result of state legislation and executive orders, GHG emission reduction, transportation electrification, and climate resilience have also has become one of the key priorities in the statewide and regional transportation planning process in addition to improving transportation mobility, addressing federal air quality criteria pollutants and ensuring that the statewide regional transportation system addresses tribal, local, regional, and statewide mobility and economic needs.	Comment incorporated
California Cleaner Freight Coalition	2.3	26	CCFC proposes the language below for a new section describing the importance of MPOs promoting transportation electrification via RTPs. 2.3 Promoting Transportation Electrification Transportation electrification will play a critical role in reducing greenhouse gases and criteria air pollutants throughout California, and the MPOs in turn will play a critical role in facilitating widespread transportation electrification. SB 350 clearly describes the importance of widespread transportation electrification for meeting climate goals and federal air quality standards. MPOs are encouraged to invest in and plan for widespread transportation electrification and the infrastructure necessary to support it. The language of SB 350 focuses on "widespread" transportation electrification. The use of the word widespread is important because adhering to existing patterns of investment in wealthier communities relative to low- or moderate-income communities would result in underinvestment in low-income communities and overinvestment in wealthier communities. SB 350 notes that "widespread transportation electrification requires increased access for disadvantaged communities, low- and moderate-income communities, and other consumers of zero-emission and near-zero-emission vehicles." MPOs, as "agencies designing and implementing regulations, guidelines, plans, and funding programs to reduce greenhouse gas emissions,"25 are required to incorporate the directives from SB 350 in their planning processes. MPOs shall prioritize widespread transportation electrification by including significant investment in transportation electrification in their plans for disadvantaged communities, as well as low- and moderate-income communities. These investments must be sufficient to develop infrastructure to support widespread transportation electrification that will advance California toward the standards and goals outlined in Public Utilities Code Section 740.12(a)(1). These include: <input type="checkbox"/> Reducing emissions of greenhouse gases to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050. <input type="checkbox"/> Achieving the goals of the Charge Ahead California Initiative (Chapter 8.5 (commencing with Section 44258) of Part 5 of Division 26 of the Health and Safety Code). <input type="checkbox"/> Meeting air quality standards, reducing petroleum use, improving public health, and achieving greenhouse gas emission reduction goals. <input type="checkbox"/> Attracting investments and high quality jobs. Requirements (Shalls) Federal: None State: Pub. Util. Code § 740.12, Health and Safety Code Section 44258. Recommendations (Shoulds) Federal: None State: California Sustainable Freight Action Plan.	Comment incorporated in Section 2.2
California Cleaner Freight Coalition	5.1	117	CCFC recommends the following edits to the 4th paragraph of section 5.1: A change to transportation analysis in environmental review under CEQA occurred with the Governor's approval of SB 743. 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 ARB Vision Model results, reductions in VMT growth and widespread transportation electrification are needed to achieve sufficient greenhouse gas emissions reduction for climate stabilization, as reflected in executive orders on 2030 and 2050 greenhouse gas targets. when determining significant transportation impacts. This helps better support active transportation, greenhouse gas emission reduction, and smart growth. 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.	Comment incorporated

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California Cleaner Freight Coalition	5.7	126	<p><u>Federal and State Clean Air Act</u> The Clean Air Act as amended in 1990 is the primary federal law that governs air quality. This law mandates the US EPA to establish sets the standards for the quantity concentrations of pollutants that can be in the air. Subsequently, the The US EPA must review revises the standards from time to time every five years and revise them as necessary to protect public health and welfare. These standards are called National Ambient Air Quality Standards (NAAQS). Standards have been established for six criteria pollutants that have been linked to health concerns; the criteria pollutants are: carbon monoxide (CO), nitrogen dioxide (NO2), ozone (O3), particulate matter (PM), lead (Pb), and sulfur dioxide (SO2). The State Implementation Plan (SIP) is the statewide plan for achieving the goals of the Clean Air Act and describes how the NAAQS will be met. The SIP has both statewide and regional components. The California Air Resources Board is responsible for submitting the SIP to the U.S. Environmental Protection Agency (EPA), and for developing and implementing statewide control measures such as those related to on-road mobile sources (vehicle emission controls). <u>Local air pollution control and air quality management districts (APCD or AQMD) are responsible for regional control measures, which may also include measures that affect mobile sources (e.g., fleet rules, indirect source review requirements).</u></p> <p>There is a California Clean Air Act in the Health and Safety Code that is generally similar in concept to the Federal Clean Air Act. Under the California Clean Air Act, the California Air Resources Board sets and updates State air quality standards. The State air quality standards are usually more stringent than the Federal, but the State air quality planning structure does not include the fixed attainment deadlines and conformity process found in the Federal program.</p> <p>Air-pollution control and air quality management districts (APCD or AQMD) <u>APCD and AQMD</u> perform regional air quality planning in consultation with the MPO/RTPA, including development of on-road mobile source emission budgets that are part of the State Implementation Plan (SIP) required by the Federal Clean Air Act. APCDs and AQMDs are the main implementation agencies for stationary source emission control programs.</p> <p>The U.S. EPA designates an area as "attainment" if the area meets the national ambient air quality standards (NAAQS) mandated by the Clean Air Act. If the area does not meet the NAAQS, it is designated as a non-attainment area. Once a non-attainment area attains a NAAQS, if the area may develop a maintenance SIP and submits <u>submit</u> a re-designation request, the U.S. EPA can re-designate the area as a "maintenance" area. The shaded areas on the map below illustrate the areas of the State that have not attained, or have attained with a maintenance SIP, the National Ambient Air Quality Attainment Standards. All of California except Lake County fails to attain one or more of the State ambient air quality standards.</p>	Comment incorporated
California Cleaner Freight Coalition	5.9	130	<p>CCFC recommends the inclusion of a new section 5.9 to describe the environmental considerations around transportation electrification in RTPs.</p> <p><u>5.9 Transportation Electrification</u> <u>State law requires MPOs to encourage the development of transportation electrification and the deployment of electric vehicles in their RTPs. Section 740.12 of the Public Utilities Code describes the importance of transportation electrification for meeting greenhouse gas emission reduction targets and air quality standards. Section 740.12 demands that agencies developing plans that address greenhouse gas emission reductions consider the findings included in the law, and promote greater adoption of transportation electrification.</u> <u>Transportation electrification is essential to meeting the targets established in Section 44258 of the Health and Safety Code. That section, otherwise known as the Charge Ahead California Initiative, sets a target of one million zero-emission and near-zero-emission vehicles on the road by 2023. MPO RTPs must include an evaluation of how the RTPs advance the goals described in Section 740.12 and in the Charge Ahead California Initiative.</u></p> <p><u>Requirements (Shalls)</u> <u>Federal: None</u> <u>State: Public Utility Code Section 740.12, Health and Safety Code Section 44258.</u></p>	Comment incorporated in Section 6.19
California Cleaner Freight Coalition	6.1	133-134	<p>The Summary of RTP Components must include a reference to the requirements of SB 350 that apply to MPOs as they develop their RTPs. The following language should be added to Section 6.1:</p> <p>At page 134: A. Measures of mobility and traffic congestion; B. Measures and needs for road and bridge maintenance and rehabilitation; C. Measures of means of travel; D. Measures of safety reliability and security; E. Measures of equity and accessibility; F. Other sources of data and information may also be used, such as a regions own source/s of information and data. <u>G. Measures of the need for infrastructure supporting transportation electrification</u> <u>H. Measures of infrastructure supporting transportation electrification in disadvantaged communities</u></p>	Comment incorporated
California Cleaner Freight Coalition	6.1	136	<p>Recommendations (Shoulds) Federal: None State: <u>California Public Utilities Code Section 740.12</u></p>	Comment incorporated
California Cleaner Freight Coalition	6.8	144-145	<p>The Draft RTP Guidelines should include a recommendation that MPOs encourage the development of infrastructure for zero emission vehicles in highway projects so that California complies with the requirements of SB 350, Executive Order B-32-15, Executive Order B-16-12, and SB 1275. CCFC recommends the following sample language, to be added to page 145: <u>9. Consider investing strategically to reduce greenhouse gas emissions, by promoting the use of zero-emission vehicles on highways.</u> <u>10. Consider investing strategically to advance widespread transportation electrification.</u></p> <p><u>Recommendations (Shoulds)</u> Federal: None State: <u>Pub. Util. Code Section 740.12; Health and Safety Code Section 44258.4(b); Executive Order B-32-15; Executive Order B-16-12.</u></p>	Comment incorporated

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California Cleaner Freight Coalition	6.8	144-145	<p>Highway projects deeply impact communities adjacent to highways, and those communities deserve the opportunity to contribute their opinions and ideas to projects that will shape their environment. CCFC recommends that the RTP Guidelines include community participation processes as best practices. Agencies must significantly improve their efforts to incorporate community-developed alternatives. In the case of the I-710 expansion project, the Coalition for Environmental Health & Justice developed an alternative that the agencies fought vigorously. When outside entities develop reasonable alternatives, agencies should be more open to evaluating these in the California Environmental Quality Act and/or National Environmental Policy Act environmental reviews.</p> <p>CCFC recommends adding the following language to this section, on page 145:</p> <p>5. Data collection and other infrastructure requirement for ITS; and,</p> <p>6. Unmet highway needs</p> <p>7. Consider CTP policy suggesting to invest strategically to optimize performance; and</p> <p>8. Consider CTP policy suggesting for the application of sustainable preventative maintenance and rehabilitation strategies.;</p> <p>9. Emissions from highways, and their impact on adjacent communities; and</p> <p>10. Community participation in the design and development of highway transportation projects.</p>	Comment incorporated
California Cleaner Freight Coalition	6.11	147-48	<p>On page 147, the RTP Guidelines note that “the CTP recognizes the importance of enhancing freight mobility, reliability, and global competitiveness...” CCFC recommends that freight efficiency be added here, and that the term (i.e., “freight efficiency”) be defined here and throughout the document according to its definition in the California Sustainable Freight Action Plan: “a measure of the value of goods transported divided by the amount of greenhouse gas emissions generated from its transportation.” This definition of freight efficiency based on the value of goods transported and associated emissions should replace or at least be added to items 4 and 13 on page 148.</p> <p>To encourage and facilitate development of RTPs that benefit overburdened communities, CCFC recommends inclusion of a disaggregated analysis of the impacts of freight. This would include a comprehensive analysis -- disaggregated by race, place, and income -- of air quality standards and health impacts in the State’s major freight corridors. (More recommendation in letter)</p>	Comment incorporated
California Cleaner Freight Coalition	6.11	147	<p>CCFC recommends the following edits to the Goods Movement section, on page 147:</p> <p>MPO and RTPAs must plan for the goods movement infrastructure in the same way they plan the transportation infrastructure for the movement of people to support projected population growth and economic development. Goods movement planning is in the public interest because of the potential economic benefits to the regional economy, environment, public health, and community well-being. Improvements to the goods movement transportation system often can result in co-benefits to the overall system when planners consider California’s economic, equity, and environmental goals simultaneously. The CTP recognizes the importance of enhancing freight mobility, reliability, and global competitiveness, which is why MPOs should consider deploying cost-effective technologies that can help expedite goods movement and reduce congestion at our ports. As a rail improvement project takes trucks off the highway, congestion is reduced and potentially reduces greenhouse gas emissions. A seamless, efficient,</p>	Comment incorporated
California Cleaner Freight Coalition	6.11	148	<p>(Page 148)</p> <p>and low-emitting, well-maintained, multi-modal transportation system is paramount to the state’s economic strength and its citizens’ residents’ quality of life. Planning this system involves a broad base of stakeholders, including affected community representatives, local organizations agencies in charge of seaports and airports, trucking associations, Class 1 and short line railroads, and freight shippers, local air districts, electric and gas utilities, and multiple state agencies (e.g., California Air Resources Board, California Energy Commission, Caltrans, California Public Utilities Commission).</p> <p>Given that freight facilities can account for a relatively large share of pollution within a regional air district and may be located near residential developments, CCFC suggests adding language to the Recommendations (Shoulds) section to encourage MPOs to follow General Plan Guidelines used for the siting of industrial facilities. That is, the California Government Code Section 65040.12 stipulates that General Plan Guidelines must “[p]ropose methods for providing for the location, if any, of industrial facilities [e.g., ports, rail yards, intermodal freight transfer stations, and warehousing and distribution centers] and uses that, even with the best available technology, will contain or produce material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant hazard to human health and safety, in a manner that seeks to avoid over concentrating these uses in proximity to schools or residential dwellings.”</p> <p>In order to ensure limited direct emissions in environmental justice communities, the Draft RTP Guidelines should provide guidance to curb logistics sprawl, particularly sprawl that will increase socioeconomic and/or environmental burdens in environmental justice communities. The Draft RTP Guidelines should provide clear criteria, based on socioeconomic, health, and air quality assessments, to ensure that infrastructure planning deters future logistics centers from being placed within or adjacent to overburdened communities. It would follow that the Draft RTP Guidelines should provide explicit guidance on necessary mitigation measures for sensitive land uses such as schools, hospitals, and housing.</p>	Comment incorporated
California Cleaner Freight Coalition	6.11	149	<p>Specifically, CCFC recommends the following language on page 149:</p> <p>Recommendations (Shoulds)</p> <p>Federal: None</p> <p>State: Government Code Section 65040.12 (General Plan Guidelines must “[p]ropose methods for providing for the location, if any, of industrial facilities [e.g., ports, rail yards, intermodal freight transfer stations, and warehousing and distribution centers] and uses that, even with the best available technology, will contain or produce material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant hazard to human health and safety, in a manner that seeks to avoid over concentrating these uses in proximity to schools or residential dwellings.”)</p>	Unable to incorporate as the government code is not specific to RTP development
California Cleaner Freight Coalition	6.11	149	<p>CCFC recommends the following language for the Best Practices segment of section 6.11, beginning on page 149:</p> <p>Best Practices: The state’s Goods Movement Action Plan (GMAP) California Freight Mobility Plan (CFMP) is a policy and action agenda document that supports the improvement of California’s goods movement infrastructure while preserving the environment. MPOs and RTPAs are encouraged to review the GMAP CFMP for guidance, and ensure consistency while addressing goods movement within their RTPs. The RTPs and the GMAP CFMP will ideally function in a feedback loop, as the goods movement strategies and projects identified in RTPs will be incorporated into the next update of the GMAP CFMP. MPOs are also encouraged to consider developing or updating freight plans for their region, as these plans can help MPOs improve the efficiency and sustainability of goods movement in their regions.</p> <p>http://www.dot.ca.gov/hq/tpp/offices/ogmlinks_files/gmap-1-11-07.pdf</p> <p>http://www.scag.ca.gov/rtp2008/index.htm</p> <p>http://www.mtc.ca.gov/planning/rfgm</p> <p>http://www.sandag.org/index.asp?projectid=292&fuseaction=projects.detail</p> <p>http://www.dot.ca.gov/hq/tpp/offices/ogm/</p> <p>http://rtpsc.scag.ca.gov/Pages/default.aspx</p> <p>http://www.alamedact.org/goodsmovement</p> <p>http://www.ops.fhwa.dot.ca.gov/freight/infrastructure/nfn/index.htm</p> <p>http://www.sandag.org/index.asp?classid=13&fuseaction=home.classhome</p>	Comment incorporated

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California Cleaner Freight Coalition	6.18	164	<p>The Draft RTP Guidelines give examples of performance measures that MPOs can include. Missing from the list is a performance measure that addresses and seeks to remedy the inequities that have resulted in communities of color and low-income communities being disproportionately burdened by pollution from transportation. CCFC recommends that the Draft RTP Guidelines add "Health Equity" to the list of examples of performance measures on page 164.</p> <p>A Health Equity performance measure introduces a consideration of the public health disparities that have been neglected in the Draft RTP Guidelines. The Environmental Quality performance measure addresses the air pollution, land use, and other environmental impacts associated with transportation, but fails to address the disparities in how the public experiences these impacts. Investment Equity seeks to ensure equity in the funds and attention that various communities and transportation projects receive, but will not necessarily result in a reduction or elimination of the disparate health impacts that low-income communities and communities of color experience. CCFC recommends that the Draft RTP Guidelines also include criteria that address health disparities due to transportation impacts. Specifically, the Guidelines should include the following language in the list of sample criteria to "measure the performance of specific projects": "Reduction of the disparity in health impacts in the most impacted communities relative to health impacts in less impacted communities."</p> <p>On page 165, the Draft RTP Guidelines continue on to give sample criteria for "measuring cost-effectiveness of specific projects in the RTP." CCFC recommends that the Guidelines include this language as one of the criteria to measure the cost-effectiveness of the Health Equity performance measure: "Decrease in air pollution emissions and greenhouse gas (GHG) emissions in highly impacted communities per thousand dollars."</p>	Comment incorporated in Chapter 7
California Cleaner Freight Coalition	6.24	180	<p>On page 180, under the heading "Designing a Forecasted Development Pattern in the SCS," the Draft RTP Guidelines should list "Design and layout of transportation facilities to facilitate access to charging in low- and moderate-income neighborhoods, as well as wealthier neighborhoods" as one of the factors to consider when creating the forecasted development pattern. MPOs must consider access to electric vehicle infrastructure in the development of their Sustainable Communities Strategies and transportation plans, with the goal of expanding access to electric vehicles and electric vehicle infrastructure to lower-income communities and communities of color.</p>	Comment incorporated
California Cleaner Freight Coalition	6.24	180	<p>On page 180, under the heading "Considering Social Equity in the SCS," the Draft RTP Guidelines note that MPOs must "encourage" the use of tools that demonstrate social equity impacts of different policies. SB 350 requires MPOs, as agencies that develop plans to reduce greenhouse gas emissions, to understand that "[w]idespread transportation electrification requires increased access for disadvantaged communities." The text under the "Considering Social Equity in the SCS" heading should be altered as follows:</p> <p>The inclusion of the entire range of community interests in the development of the RTP (including the SCS) is a key element in the process, and is required by state and federal law. Providing more transportation and mobility choices such as increased transit, bicycle, and pedestrian facilities, as well as appropriate housing choices near job centers increases opportunities for all segments of the population at all income levels. Each MPO is encouraged to develop, enhance, and use visioning tools during the SCS development process enabling the public and policy makers to clearly see social equity impacts of various planning scenarios and make informed choices. These include impacts on air quality, access to transit, access to electric vehicle charging, household transportation costs, housing costs and overall housing supply. Additional information regarding specific statutory requirements for social equity and environmental justice considerations in the RTP is available in Section 4.2 and additional information regarding social equity and environmental justice issues in the public participation process is available in Section 4.3.</p>	Comment incorporated
California Coastal Commission	6.13	157	<p>under the sub-heading "SB 1396—California Coastal Trail," first paragraph, modify the last line to read "...development of the coastal trail. The law also requires that Regional Transportation Plans include provisions for the coastal trail. As RTPs are updated, the CCT provisions from each respective certified LCP Land Use Plan's policies, programs and maps should be integrated into the RTP updates."</p>	Comment incorporated
California Coastal Commission	6.13	158	<p>same sub-heading, second paragraph, add after last sentence "Prioritization of projects within RTPs should include consideration of connecting the CCT across identified critical gaps in the coastal trail system."</p>	Comment incorporated
California Coastal Commission	6.13	158	<p>list of links, add www.yourcoast.org [provides access to content featured in the <i>Coastal Access Guide</i>, as periodically updated and published by the UC Press]; also, delete http://scca.ca.gov/webmaster/pdfs/CCT_Siting_Design.pdf [does not work], and add http://www.coastal.ca.gov/access/ctrail-access.html</p>	Comment incorporated
California Natural Resource Agency	NA	NA	<p>Section-I: Climate Adaptation in the RTP Guidelines</p> <p>We thank the RTP Guidelines writers for offering a solid foundation for climate adaptation policy and implementation. CNRA wishes to further operationalize what climate adaptation means in the transportation context. We hope that this clarity helps land use and transportation planners, project managers, and engineers better incorporate these suggestions into planning, design and construction.</p>	Comment Acknowledged
California Natural Resource Agency	NA	NA	<p>Section-I: Climate Adaptation in the RTP Guidelines</p> <p>We suggest adding these sources of authority:</p> <p>Senate Bill 246</p> <p>Creates the Integrated Climate Adaptation and Resiliency Program in the Governor's Office of Research and Planning, as well as a climate adaptation clearinghouse that will include climate adaptation tools, research reports, funding opportunities, etc.</p>	Comment incorporated
California Natural Resource Agency	NA	NA	<p>Section-I: Climate Adaptation in the RTP Guidelines</p> <p>We suggest adding these sources of authority:</p> <p>Senate Bill 379</p> <p>SB 379 amends Section 65302 of the California Government Code to require a legislative body of a city or county to adopt a comprehensive, long-term general plan that includes a safety element. This safety element provides protection of the community from unreasonable risks associated with the effects of various geologic hazards, flooding, and wildland and urban fires. When creating this safety element, the legislative body shall consider advice provided in the Governor's Office of Research and Planning General Plan Guidelines and include a variety of sources of climate scenarios, including Cal-Adapt and the most recent version of the Adaptation Planning Guide.</p>	Comment incorporated
California Natural Resource Agency	NA	NA	<p>Section-I: Climate Adaptation in the RTP Guidelines</p> <p>As State Agencies begin to fulfill EO B-30-15's mandate to take climate change into account in all planning and investment decisions as well as climate adaptation legislation, we suggest adding the following tools. The following are guidance documents that serve as tools to incorporate climate change impacts into planning and investments:</p> <ul style="list-style-type: none"> California Climate Adaptation Planning Guide (APG) <ul style="list-style-type: none"> The California Natural Resources Agency, California Emergency Management Agency, with support from California Polytechnic State University- San Luis Obispo, and with funding through the Federal Emergency Management Agency and the California Energy Commission developed this guidance document. The APG provides a step-by-step process for local and regional climate vulnerability assessment and adaptation strategy development. The following are companion documents: <ul style="list-style-type: none"> APG: Defining Local and Regional Impacts APG: Understanding Regional Characteristics APG: Identifying Adaptation Strategies State of California Sea Level Rise Guidance Document <ul style="list-style-type: none"> The Coastal and Ocean Working Group of the California Climate Action Team (CO-CAT) developed the Sea Level Rise Guidance Document in 2013, basing its recommendations on the National Research Council's 2012 findings for anticipated sea-level rise and coastal impacts. Addressing Climate Change Adaptation in Regional Transportation Plans Prepared by Cambridge Systematics, Inc. for Caltrans, the report provides information for both a basic user (MPO or RTPA conducting climate vulnerability and risk assessments for the very first time) and an advanced user (a MPO or RTPA that has experience and strong interagency, cross-sector partnerships in making these assessments and addressing them). 	Comment incorporated

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California Natural Resource Agency	NA	NA	<p>Section-I: Climate Adaptation in the RTP Guidelines Here are a number of plans that can also serve as tools to plan in light of climate change projections:</p> <ul style="list-style-type: none"> • Safeguarding California: Reducing Climate Risk o Relevant to the RTP Guidelines, the 2014 report includes recommendations for how California’s transportation system can adapt to climate change. • Safeguarding California: Implementation Action Plans8 o In March 2016, the California Natural Resources Agency published an overarching strategy for, most relevant to the RTP Guidelines process, how the State’s transportation system can, and will, prepare for climate change. The implementation action plans also includes actions for how the land use and community development sector can, and will, prepare for climate change. 	Comment incorporated
California Natural Resource Agency	NA	NA	<p>Section-I: Climate Adaptation in the RTP Guidelines We suggest including one or two examples to show how state grant programs are operationalizing the Executive Order B-30-15’s mandate while also providing funding opportunities to local stakeholders and tribal governments. For example, we suggest adding the Strategic Growth Council’s Affordable Housing and Sustainable Communities grant program (AHSC) on page 187. Funded by the California Climate Investments, (formerly Greenhouse Gas Reduction Fund), AHSC awards points based on the grantee’s efforts to reduce GHG emissions and prepare for the anticipated changes in the environment. State agency reviewers are able to learn how MPOs are conducting vulnerability assessments of the transportation infrastructure and users of the system.</p>	Comment incorporated
California Natural Resource Agency	NA	NA	<p>Section-I: Climate Adaptation in the RTP Guidelines We encourage Caltrans and CTC to highlight some of the State tools that can help identify the region’s most vulnerable populations. Tools such as Cal-Adapt, funded by the California Energy Commission, and CalEPA’s Urban Heat Island index, a way to measure differences in temperature between urban areas and their respective rural areas9, provide information on what California’s environment will be in the future. We also point to the Climate Action Team’s Public Health Workgroup’s subcommittee, the Heat Adaptation Workgroup’s report, <i>Preparing California for Extreme Heat: Guidance and Recommendations</i> .</p> <p>Tools such as the Public Health Alliance of Southern California’s Health Disadvantage Index, the California Department of Public Health’s CalBRACE, and CalEPA’s Cal EnviroScreen 2.0 identify social and environmental indicators to help give a sense of how these climate change impacts will affect people. The California Department of Public Health’s Division of the Office of Health Equity’s Climate Change and Health Equity Team explains that climate change will disproportionately affect the very young, elderly, those with chronic diseases and disabilities, communities of color, immigrants, tribal nations, and those with limited resources, noting that existing health inequities will be magnified.</p>	Comment incorporated
California Natural Resource Agency	NA	NA	<p>Section-II: Conservation Efforts in the RTP Guidelines The RTP Guidelines can include strategies to curb the construction of transportation infrastructure that will lead to sprawling development. For example, the people of the City of Sonoma approved an Urban Growth Boundary (UGB) in its General Plan13. Based on population projections and job forecasting, the UGB encourages the creation of walkable and bikable neighborhoods and protection of the natural environment and the town’s thriving agricultural industry by directing future urban development inside the UGB. The people of Sonoma also want to improve the quality of life for residents, particularly low-income and transit-dependent residents (such as children, seniors and people with disabilities) by directing housing development into areas where services and infrastructure can be provided in a cost-effective manner.</p>	Comment Acknowledged
California Natural Resource Agency	NA	NA	<p>Section-II: Conservation Efforts in the RTP Guidelines Lastly, we want to highlight the work that California Department of Fish and Wildlife and Caltrans has done on addressing habitat connectivity. While many think of the large-scale Highway 101 overpass project, we point to tools that can help speed along habitat corridor projects in a cost-effective way during the initial phases of project planning and design.</p> <ul style="list-style-type: none"> • California Essential Habitat Connectivity Project o The Project serves as a planning tool for conservation and transportation, identifying essential connectivity areas (important areas for maintaining connectivity between large blocks of habitat). • Western Governors Association’s Crucial Habitat Assessment Tool (CHAT) o This mapping tool identifies crucial habitats, designed to reduce conflicts and surprises while ensuring wildlife values are better incorporated into land use planning, particularly for large-scale linear projects. • California State Wildlife Action Plan, Transportation Companion Plan o The Companion Plans to the State Wildlife Action Plan provide information for connected, yet distinct, sectors. The transportation plan includes strategies, tools and information in order to protect and enhance California’s habitats. 	Comment incorporated
California Natural Resource Agency	NA	NA	<p>Section-III: Council of Environmental Quality’s NEPA Guidelines On August 1, 2016, CEQ issued new guidance to assist Federal agencies in their considerations of the effects of GHG emissions and climate change when evaluating proposed Federal actions in accordance with the National Environmental Policy Act (NEPA) and the CEQ Regulations Implementing the Procedural Provisions of NEPA (CEQ Regulations).</p> <p>In light of the ± 75 percent of federal transportation funding being allocated directly to MPOs and the remaining ± 25 percent being allocated through CTC, CNRA finds the CEQ guidance critically important to incorporating in Sections 5.1 and 5.2, 5.5, and 6.28. We understand the timing of the release provides a challenge to the RTP Guidelines staff and would be happy to collaborate with you on how we can better incorporate the White House guidance into the RTP Guidelines.</p>	Comment incorporated
California Natural Resource Agency	NA	NA	<p>Section-IV: Names and Definitions We thank you for your attention to detail throughout the proposed RTP Guidelines. Below are some updates to names, acronyms:</p> <ul style="list-style-type: none"> • Please replace Fish and Game with Fish and Wildlife (CDFW). • Please replace California Natural Resources Agency to CNRA. • Please include environmental justice in the brackets for positive outcomes instead of the brackets for negative outcomes on page 147. 	Comment incorporated
California Pan-Ethnic Health Network	2.3	26	<p>Section 2.3: Promoting Health 1. Strengthen connection between community health, health equity and transportation planning.</p>	Comment incorporated
California Pan-Ethnic Health Network	2.3	26	<p>Section 2.3: Promoting Health Recommendation 1: Strengthen connection between community health, health equity and transportation planning. The draft RTP Guidelines include a new section detailing ways transportation planning is important for promoting health. We appreciate the introduction this new section and commend the clear explanation of the direct health benefits associated with equitable and strategic transportation planning. However, this section may be strengthened with a deeper analysis of the role transportation planning plays in community health and equity.</p>	Comment incorporated

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California Pan-Ethnic Health Network	2.3	27	<p>Amend Section 2.3 to add the following (p. 27):</p> <p>Improving transportation infrastructure in ways that encourages walking and cycling is an effective way to improve physical activity, decrease traffic collisions, and improve one's health status. But, transportation planning also has a tremendous impact on community health, safety, and neighborhood cohesion.</p> <p>For instance, health-focused transportation plans can help reduce the number of injuries and fatalities from collisions. Some research suggests that there is a multiplier effect: when streets are designed to safely accommodate walking and biking, more people do so, and as more people walk and bike the rate of collisions actually goes down as pedestrians and bicyclists become more visible to motorists. In addition, more people walking and biking in a neighborhood has an important public safety benefit, as it means there are more "eyes on the street" to deter criminal activity. Taking this a step further, studies have shown that people who live in neighborhoods with less traffic and higher rates of walking, bicycling, and transit use know more of their neighbors, visit their neighbor's homes more often, and are less fearful of their neighbors. When streets are inhospitable to pedestrians and bicyclists, residents don't feel safe walking or biking to nearby transit and their ability to access regional educational and employment opportunities is hampered. In short, improving traffic safety results in better public health beyond simply reduced injuries and fatalities.</p> <p>Additional examples of how transportation planning can promote health include:</p> <ul style="list-style-type: none"> • Transportation planning can help residents reach jobs, education, social services, and medical care by walking, biking or public transportation in a timely manner. • Reducing commute times and increasing public transportation reliability can reduce stress and improve mental health. • Affordable transportation options enables low income households to invest in savings, education, and healthier food options—all factors that contribute to greater individual and community health. 	Comment incorporated
California Pan-Ethnic Health Network	4.2	100	<p>Section 4.2: Social Equity Factors</p> <p>3. Strengthen best practices to encourage robust engagement of communities most affected by health inequities driven by planning and development, especially communities of color.</p> <p>4. Encourage local governments and MPOs to conduct education and outreach before beginning the formal input process.</p>	Comment incorporated
California Pan-Ethnic Health Network	4.3	101	<p>Section 4.3: Social Equity Factors</p> <p>The draft RTP Guidelines designate a new section for social equity factors. Within this section includes existing best practices for MPOs to ensure community involvement. While these practices are appropriate and proven strategies, this section could go much further in engaging the community in a robust and proactive manner.</p>	Comment incorporated
California Pan-Ethnic Health Network	4.3	101	<p>A. Amend Section 4.3 to encourage the following community engagement strategies and best practices as part of MPO planning processes (p. 101):</p> <ul style="list-style-type: none"> • 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. • Consider the needs to low-income and LEP individuals when translating outreach materials and ensuring that documents are easy to understand (i.e. evaluate the reading level of the materials and quality of translations) • Make sure that there is agreement between residents and the local planning authority about what community engagement includes • Educate and build capacity of community members on issues such as data, evaluation, storytelling, and mentoring community members new to the process • Use a community health worker or promotora model to identify resident leaders • Use facilitators with experience in race and power inequities at community meetings • Work with community-based and membership organizations across the region to jointly plan public workshops on the RTP, especially the Title VI and Environmental Justice analyses. They know the communities impacted by the RTP transportation projects and can assist with recruiting residents, businesses and other affected stakeholders. Be proactive in asking for their participation instead of waiting for them to come to you. 	Comment incorporated
California Pan-Ethnic Health Network	4.3	101	<p>B. Amend Section 4.3 to replace "minority households" with more specific terminology, such as "communities of color" (p. 101).</p> <p>California has long been a diverse state. By 2050, communities of color are expected to be 75% of California's population. Currently, Latinos are 38% of the population and by 2025 they are expected to reach 42%. Latino children are already 52% of the population age 12 and younger. Our state is also home to the largest Asian American and fifth largest African American populations in the nation. "Minority households" is an inaccurate way to describe communities of color in California. When referring to these communities, use more precise or specific terminology.</p>	Comment incorporated
California Pan-Ethnic Health Network	4.4	102	<p>Section 4.4: Participation Plan</p> <p>5. Include local public health departments as stakeholders the MPOs should engage in developing their participation plan.</p>	Comment incorporated
California Pan-Ethnic Health Network	4.4	103	<p>Section 4.4: Participation Plan</p> <p>Recommendation 4: Include local public health departments as stakeholders the MPOs should engage in developing their participation plan (p. 103).</p> <p>MPOs are required to consult with stakeholders and agencies when developing their plans for public participation. To prioritize health and health equity, public health departments must be considered a key agency for MPOs to consult. Public health departments can serve as critical partners to MPOs and MPOs should leverage their expertise. Public health departments can help inform the public participation plan so that it reaches experts and community members who can advise on the best mechanisms for transportation planning to help address or prevent chronic diseases such as obesity, hypertension, asthma and heart disease.</p>	Comment incorporated
California Pan-Ethnic Health Network	Apx. L	293	<p>Appendix L: Promoting Health and Equity in MPO RTPs</p> <p>Recommendation 2: Develop a framework and checklist to illustrate how MPO policies, projects and programs meet public health goals.</p> <p>Assembly Bill 441 requires the RTP Guidelines to include a summary of the projects, policies, and practices that MPOs are employing to promote health and health equity. While Appendix L does provide a summary of the projects, policies and practices, it misses an important opportunity to frame and analyze how these meet public health goals. Appendix L can provide a checklist to illustrate how each regions' RTP health-related strategies meet key public health goals.</p> <p>Take for example the Southern California Association of Governments' (SCAG) Public Health Appendix for its 2016 RTP. Their appendix includes a description of the RTPs goals and a checklist of how it addresses public health focus areas:</p> <p>In fact, similar to how a health impact assessment systematically evaluates data and inputs to determine the potential health impacts of a policy on a population, Appendix L could serve as a broad analysis on how the policies, practices and projects employed by each MPO actually meet public health goals. To achieve this, Appendix L should include a clear framework of why it is important to prioritize health and health equity in transportation planning and identify key public health and health equity goals. The policies, projects, and practices included in Appendix L, then, should be analyzed with a checklist of the identified public health goals so that readers can visually identify how each region's policies, practices and projects specifically address health and health equity.</p>	This information is being incorporated as an example for Appendix L

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California Pan-Ethnic Health Network	NA	NA	<p>Recommendation 3: Strengthen best practices to encourage robust engagement of communities most affected by health inequities driven by planning and development, especially communities of color.</p> <p>The communities that are most affected by health inequities linked to transportation, land use and development have been working to promote policy change locally for decades. Our recommendations for improving community engagement are grounded in these lessons learned and feedback from our community meetings.</p> <p>Moving forward it is critical that the communities experiencing health inequities are part of the planning process. Past efforts demonstrate the negative impact of such exclusion. There are numerous examples of transportation projects that have had negative consequences on predominately low-income communities of color, including significant numbers of displaced families, and this has led to distrust of local government among low-income, immigrant, Limited English Proficient (LEP), and communities of color. Below are recommendations for ensuring disadvantaged communities and those most impacted by environmental, land use, and transportation decisions are included in this and other key decision-making processes.</p>	Comment incorporated
California Pan-Ethnic Health Network	NA	NA	<p>Recommendation 4: Encourage local governments or MPOs to conduct education and outreach before beginning the formal input process.</p> <p>At our recent regional meetings, many community residents raised that they did not know where their MPO is in the process of revising their RTPs. Many felt that meetings were held behind closed doors, little outreach had been conducted, and that even if meetings were publicized they likely would not be able to attend.</p> <p>Additionally, organizations and individuals interested in providing comments and feedback on the RTPs felt they needed education about key terms and processes before they could truly inform the process. Therefore, we recommend that the RTP Guidelines suggest that MPOs provide an informational seminar/workshop for residents before the planning process to educate community members about the document, the process, and how they can be involved.</p> <p>As mentioned above, the quality and outcomes of the community engagement process is vitally important to successful community involvement and feedback. While the draft Guidelines provide clarity and insight into seeking community input, the document does little to guide MPOs on how to loop back to community members to share how and why their feedback was or was not included.</p>	Comment incorporated in Section 4.3
California Pan-Ethnic Health Network	NA	NA	<p>Additional Recommendation Recommendation 5: Create and include the civil rights section submitted by Public Advocates.</p> <p>The current draft Guidelines simply provide federal and state civil rights and environmental justice laws and requirements, but lack meaningful guidance on how to operationalize these requirements. Accordingly, we strongly urge you to include a separate chapter in the Guidelines to on federal and state requirements, as well as best practices, relating to civil rights and environmental justice. Additionally, CPEHN and many of our partner organizations have endorsed "Principles to Guide the RTP Guidelines Update." We look forward to working with you on integrating these principles throughout the update and urge you to integrate the separate Civil Rights chapter submitted by Public Advocates.</p>	Comment incorporated in Sections 4.2, 4.3, and 4.4.
Climate Plan	3	47	<p>MODELING</p> <p>1. MPOs should develop transportation models that adequately convey the benefits of compact growth and investments in transit, active transportation, and equitable communities. Models that fully convey the impacts of different scenarios and investments will help MPOs to select the most beneficial projects for their regions. Specifically, MPOs should:</p>	
Climate Plan	NA	NA	Below, we offer the following recommendations (organized by category) on leading practices from the RTP / SCS to include in the RTP guidelines:	Comment Acknowledged
Climate Plan	NA	NA	<p>SCENARIO CREATION AND DEVELOPMENT</p> <p>1. The scenario creation process should increase public engagement as a discussion focused on where and how the region should grow. As a result of this, MPOs will be more informed about – and better equipped to meet – the needs of the communities they serve. Specifically, MPOs should:</p>	In process of incorporation in Appendix M
Climate Plan	NA	NA	<p>SCENARIO CREATION AND DEVELOPMENT</p> <p>2. The land use scenarios and transportation investments should be consistent with protecting natural and working lands. Land use patterns that protect resource areas and farmland can help reduce greenhouse gas (GHG) emissions, while providing a range of benefits. Specifically, MPOs should:</p>	In process of incorporation in Appendix M
Climate Plan	NA	NA	<p>SCENARIO CREATION AND DEVELOPMENT</p> <p>3. The land use scenarios and transportation investments should prioritize the needs of vulnerable populations and underserved communities. The burdens of poor land use planning and lack of mobility are often heaviest in underserved communities. Without proactive effort, these disparities could be easily be overlooked. Specifically MPOs should:</p>	In process of incorporation in Appendix M
Climate Plan	NA	NA	<p>SCENARIO CREATION AND DEVELOPMENT</p> <p>4. Land use forecasts and transportation investments should take into account, and help to reduce, the threat of displacement. Displacement increases demand for cheaper housing on the periphery, which leads to longer commutes and higher per capita VMT. Incorporating displacement can help identify options to remedy this. Specifically, MPOs should:</p>	In process of incorporation in Appendix M
Climate Plan	NA	NA	<p>SCENARIO CREATION AND DEVELOPMENT</p> <p>5. Land use forecasts and transportation investments actively address and adapt to anticipated climate impacts. Land use scenarios and transportation investments that take the impacts of climate change into account can help ensure the effectiveness of transportation investments as conditions change. Specifically, MPOs should:</p>	In process of incorporation in Appendix M
Climate Plan	NA	NA	<p>PERFORMANCE TARGETS</p> <p>1. MPOs should adopt a focused list of performance targets to communicate to the public the impacts of the scenarios and how they measure up to the region's important goals. To understand the differences between scenarios, MPOs need clear performance targets that address their communities' wellbeing. Specifically, MPOs should:</p>	In process of incorporation in Appendix M
Climate Plan	NA	NA	<p>TRANSPORTATION</p> <p>1. MPOs should engage in a data-driven process, which includes robust public input, to select the best transportation projects that will reduce greenhouse gas emissions and meet community needs. Specifically, MPOs should:</p>	In process of incorporation in Appendix M
Climate Plan	NA	NA	<p>TRANSPORTATION</p> <p>2. MPOs should shift funds away from road expansion to transit, active transportation, and other programs that help lower per capita VMT. Historically, funding has prioritized road expansion and highway construction. Now, to meet the needs of the communities they serve, MPOs should prioritize transportation that meets the goals of the SCS process. Specifically, MPOs should:</p>	In process of incorporation in Appendix M
Climate Plan	NA	NA	<p>TRANSPORTATION</p> <p>3. Plan and prioritize investments that support active transportation. Providing transportation alternatives other than driving not only supports public health through increased physical activity and improved air quality, but also helps to reduce per capita VMT and GHG emissions. Specifically, MPOs should:</p>	In process of incorporation in Appendix M
Climate Plan	NA	NA	<p>AFFORDABLE HOUSING</p> <p>1. Collaborate with local jurisdictions and affordable housing developments to support implementation of the Regional Housing Needs Allocation (RHNA). Collaborating to implementation the RHNA can help to reduce displacement and lower VMT for workers who could not otherwise afford homes near their jobs. Specifically, MPOs should:</p>	In process of incorporation in Appendix M
Climate Plan	NA	NA	<p>NATURAL AND WORKING LANDS</p> <p>1. Include comprehensive regional mitigation for natural and working lands impacted by transportation projects. A regional advance mitigation planning (RAM) program can make transportation investments more cost-effective by linking it to science-based, regional conservation priorities. Specifically, MPOs should:</p>	In process of incorporation in Appendix M

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Organization	Chapter	Ch. Page	Comment	Staff Response
Climate Plan	NA	NA	RURAL COMMUNITIES 1. For rural communities, ensure that transportation planning and investments contribute to mobility, jobs/housing balance and fit, improved health and quality of life, and reduced per capita VMT in rural communities. The effectiveness and legitimacy of the SCS depend upon ensuring that land use and transportation decisions do not exclude these communities. Specifically, MPOs should:	In process of incorporation in Appendix M
Climate Plan	NA	NA	SCS IMPLEMENTATION 1. Use competitive planning grants and technical assistance programs to support implementation at the local level. With the exception of Tahoe, MPOs do not have land use planning authority. But incentives can support implementation of SB 375. Specifically, MPOs should:	In process of incorporation in Appendix M
Climate Plan	NA	NA	PUBLIC PARTICIPATION 1. Ensure broad community representation on committees and in the planning of public workshops. Local residents and community organizations must be involved in scenario development and evaluation, and in selection of transportation investments. Specifically, MPOs should:	In process of incorporation in Appendix M
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.	Comment Acknowledged
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.	Comment Acknowledged
County of Sacramento	2.3	26	5. Provide Guidance on Integrating Public Health Framework for Transportation Planning. Section 2.3 on Public Health seriously understates the scientific evidence of how the transportation system impacts health. It needs to be clearly stated that the biggest health impacts of the transportation system are on physical activity and chronic disease reduction. Transportation-related physical activity, air pollution, and road traffic injuries are inter-related, but, given prevailing levels of air pollution in California, the greatest health gains will be through active transportation accompanied by safety improvements for pedestrians and cyclist. I recommend that Section 2.3, Promoting Health, include additional discussion on the links between active transportation and public health, as well as additional language on the co-benefits of investing in transportation projects that reduce greenhouse gas emissions, provide for climate resiliency and improve and social determinates of health. This discussion can that be further expanded upon in the narrative and in the case studies in Appendix L. I also strongly recommend that the Guidelines require RTPs to include a Public Health element. This element would include, at a minimum, discussion of physical activity and related health outcomes, air pollution and related health and climate outcomes, and bicycle, pedestrian and motor vehicle injuries and fatalities related to traffic collisions. Additionally the element should include noise, access to essential services and health impacts associated with GHG emissions reductions and other transportation-related impacts on the social determinants of health.	Comment Acknowledged; unable to incorporate without statutory citation
County of Sacramento	Apx. L	293	6. Leverage Appendix L to Provide a Public Health Framework for RTP Analysis: The first draft of Appendix L does not provide any guidance to MPOs on how to intergrade public health approach to transportation planning, decision-making, and investments. I recommend Appendix L incorporate a broad discussion of transportation and its impact on public health and a discussion of recommended health-transportation performance indicators in addition to the current draft's summary of current MPO efforts. Additionally, utilizing the California Health Disadvantage Index http://phasocal.org/ca-hdi/ as a resource to prioritize targeted funding decisions will have further health benefits in connecting health to transportation investment	Comment incorporated
County of Sacramento	NA	NA	1. Increase Access and Public Participation to the RTP Process. I encourage Caltrans and CTC to incorporate public feedback, especially the recommendations for public participation in RTP process. Given the very short outreach, comment and adoption schedule adequate community member and stakeholder engagement, with meaningful inclusion cannot and is not occurring. I ask that the schedule be lengthened and adjusted to accommodate an intentional and inclusive process	Comment Acknowledged
County of Sacramento	NA	NA	2. Strengthen Complete Streets and Active Transportation Guidance to Empower MPOs and Incentivize Innovation. MPOs should be explicitly empowered to exchange increased local compliance with AB 1358 (Complete Street Act), as well as to encourage multimodal transportation investments, particularly in disadvantaged communities with higher health and income disparities.	Comment incorporated
County of Sacramento	NA	NA	3. Integrate First/Last Mile Considerations. I recommend the Guidelines include language and guidance on first and last mile connections to transit	Comment incorporated
County of Sacramento	NA	NA	4. Encourage Regional Funding for Active Transportation & Support Health: I recommend the Guidelines include a discussion of how active transportation projects are eligible for a variety of state and federal funding streams that are managed by the MPOs, including the Active Transportation Program, Congestion Mitigation and Air Quality (CMAQ) program, and the Surface Transportation Program (STP). Emerging practices such as including health benefits of projects should be included in all grant programs, and specifically award points to engaging with the local health department in responding to the questions and documenting the results of that contact (as what will occur in the 2017 Active Transportation program scoring rubrics)	Comment incorporated
County of Sacramento	NA	NA	7. Institutionalize Public Health Review of RTPs and Provide Funding for Health Participation. I RECOMMEND THAT IN THE Consultation & Coordination chapter, the Guidelines require, or at least strongly encourage, coordination and consultation with public health departments in preparing the RTP. Given the significant lack of funding Public Health (state and legally) receives, new funding for their participation is essential for their inclusion and participation to occur in a productive way.	Comment incorporated
County of Sacramento	NA	NA	8. Make the Modeling Process More Transparent and Inclusive of Active Transportation, Public Health and Social Equity. At a basic level, the models should incorporate non-auto modes of transportation and ensure that the models accurately estimate the impact of shifting more trips from cars to walking, bicycling and transit. The models should also estimate more than just trips from home to work, but also home to school (and work), trips to shopping and other destinations and more complex trip chains. Utilize and provide funding to utilize tools such as Urban Footprint, ITHIM and other innovative models that to model transportation and land use scenarios for improved health outcome decision-making. They integrate a range of health outcomes that can be helpful in assessing co-benefits of the RTP/SCS. Funding needs to accompany these tools to cover the costs of populating all the data points needed to utilize these tools	Comment Acknowledged
County of Sacramento	NA	NA	9. Shift funds away from road expansion to road maintenance, transit operations, active transportation, vanpools, and other programs that lower per capita VMT and meet the goals of SB 375.	Comment Acknowledged
County of Sacramento	NA	NA	10. Encourage Greater Consistency of the RTP with State, County, Local and other Plans. The ClimatePlan report recommends the following four things need to happen to encourage consistency: • Connect transportation decisions to their impacts on the climate and communities • Invest more and sooner in public transit, biking, and walking • Convene leaders and get better data to support action • Step: Regional planning is "bottom up," and this means that every county, city, and town must do its part for the region to succeed	Comment Acknowledged
County of Sacramento	NA	NA	11. Provide Greater Guidance for Rural Areas Within MPOs. The Guidelines should ensure that growth and transportation investments in rural communities reduce greenhouse gas emissions as well. An RTP/SCS should include policies and programs that direct investments to these communities to plan for growth in ways that improve sustainability and access to jobs and services. We don't want to see GHG reductions - and co-benefits - to more urban areas come at the expense of low income rural communities.	Comment incorporated in Section 6.26
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.	

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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?	
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	46	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) we 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	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	Comment incorporated
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.	Comment incorporated
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.	Comment incorporated
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)	Comment incorporated
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) " may 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 MAY	Comment incorporated
El Dorado County, Community Development Agency	2	21	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	Comment incorporated
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.	Comment incorporated
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.	Comment Acknowledged
El Dorado County, Community Development Agency	4	97	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	Comment incorporated
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.	Comment incorporated
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) " may 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 MAY .	Comment incorporated
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.	Comment incorporated
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.	Comment incorporated

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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.	Comment incorporated
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.	Comment incorporated
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.	Comment incorporated
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	Comment incorporated
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.	Comment incorporated
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."	Comment incorporated
Fresno Council of Governments	2.1	23	Revise to provide section for "Section 65080 states RTPs shall include the following:"	Comment incorporated
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.	Comment incorporated
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.	Comment incorporated
Fresno Council of Governments	2.4	28	"For MPO non-attainment regions, the FHWA and FTA are responsible for making the RTP conformity determination. "	MPOs are responsible as well for the conformity analysis that leads to the 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.	Comment incorporated
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.	
Leadership Council for Justice & Accountability, Central CA Asthma Collaborative, Central CA Environmental Justice Network	3	47	Modeling With expected increases in population growth in the San Joaquin Valley, we must engage in smart growth planning that will mitigate that growth. We need to ensure that existing disadvantaged communities are not bearing the burden of this growth but are reaping the benefits. Community priorities, therefore, must be included when modeling for future growth patterns and developing growth scenarios. For example, during Fresno County's 2014 RTP modeling process, Scenario D reduced growth from proposed new town development and foothill communities and reallocated higher-density growth to existing cities and disadvantaged communities. Scenario D resulted in equal and greater greenhouse gas emission reductions, higher active transportation and transit usage, and decreased vehicle-miles traveled than the scenario that was ultimately selected. While this scenario was not selected for the county's RTP, it proves that equitable investment in existing communities over new communities produces social, economic and environmental benefits that SB 375 is intending to achieve. The RTP Guidelines should include language that directs MPOs to proactively work with community based organizations and community leaders to incorporate community priorities into scenarios for modeling. Additionally, we recommend language that directs MPOs to work together with community leaders to identify infill opportunities in existing communities - particularly in low income communities - and utilize the information to create alternative scenarios that when supported with adequate and sustainable transportation networks will result in greenhouse gas emission reductions and associated co-benefits	
Leadership Council for Justice & Accountability, Central CA Asthma Collaborative, Central CA Environmental Justice Network	3	NA	Sequencing of Plan Development To truly develop authentic RTPs, MPOs should work diligently to ensure that each component of the plan is developed through appropriate processes. Based on our engagement in the 2014 RTP/SCS plans in the San Joaquin Valley, many of the MPOs simply rolled over projects from the previous plan's financially constrained project list and then adjusted land use patterns to fit those transportation investments. This results in land use practices that are not well-integrated with transportation networks and do not improve conditions in existing disadvantaged communities. The language in the Draft (Section 3.3, pg. 49) currently provides this recommendation on the MPOs modeling of transportation and land use projects: "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." This could be made stronger by clearly listing the order in which the model should be developed; the final RTP Guidelines needs to ensure that land use patterns are studied before scoring criteria is adjusted and transportation network incorporated. We recommend that CTC include language in the guidelines that direct MPOs to first work with communities to develop land use scenarios, review and adjust scoring criteria to be consistent with state planning priorities and climate goals, review transportation projects in the list to determine consistency with adjusted scoring criteria and then develop alternative transportation investment scenarios for each land use scenario alternative.	

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Leadership Council for Justice & Accountability; Central CA Asthma Collaborative; Central CA Environmental Justice Network	NA	NA	<p>Improving Public Participation Meaningful public participation is essential for the development of robust and equitable RTPs. As organizations that work to engage communities in decision making processes related to the built environment we would like to emphasize the value of authentic community engagement through each stage of RTP/SCS development. We offer the following recommendations to be included in the guidelines:</p> <ul style="list-style-type: none"> ● Provide all materials related to the update with adequate time for public review and input. ● Provide early and ongoing drafts for public review to ensure transparency. Based on our experience, MPOs have been reluctant to release draft products of scenario development, documentation related to housing and employment growth allocations and transportation investments and thus leaving limited time for public review and input. ● Hold all meetings at accessible locations, provide interpretation in all necessary languages and translate all materials. We recommend all MPOs employ Fresno Council of Governments strategy of providing funds to local community based organizations to support authentic community engagement. ● We recommend including Fresno Council of Governments recently adopted 2018 RTP/SCS Public Participation Plan as a best practice. ● All MPOs should strive to meaningfully respond to every comment submitted at public workshops so that members of the public are aware of how their comments were meaningfully included throughout the decision making process. 	Comment incorporated in Section 4.3 and Appendix M
Leadership Council for Justice & Accountability; Central CA Asthma Collaborative; Central CA Environmental Justice Network	NA	NA	<p>Ensuring Co-Benefits in Rural Areas Within MPOs In the previous round of RTP adoption processes, we saw very little housing and employment growth as well as transportation investments allocated to low income, rural communities. Strategies to reduce greenhouse gas emissions must go beyond urban centers to ensure that all residents benefit from resources but also see reduction in pollution in their communities. When transportation related investments were included in the Plans, they were not placed in the communities that need them the most. The RTP Guidelines must include language that requires MPOs to include policies and programs that direct investment to lower income rural communities first to avoid greenhouse gas reductions and co-benefits from only occurring in urban areas at the expense of the rural communities who need it the most.</p>	Incorporated in Section 6.26
Leadership Council for Justice & Accountability; Central CA Asthma Collaborative; Central CA Environmental Justice Network	NA	NA	<p>Ensure Transportation Investments Reflect State Planning Priorities and Climate Goals As we discuss above MPOs must ensure that transportation investments are equitable and truly support shifts in travel modes, further state planning priorities and are consistent with state's climate goals. We recommend CTC include language in guidelines that direct MPOs to adjust scoring criteria to support projects that both reduce greenhouse gases and maximize social, economic and environmental benefits; review and analyze transportation projects to ensure consistency with revised scoring criteria; and develop alternative transportation scenario investments for modeling.</p>	Comment acknowledged
Metropolitan Transportation Commission	3	46	The overall organization of the modeling chapter is disjointed and would benefit from re-organization.	
Metropolitan Transportation Commission	3	46	The modeling chapter should contain requirements for modeling; guidance on things that modeling is used for should be in other chapters.	
Metropolitan Transportation Commission	3.4	50	Reference is made to using the same land use policy across regions, which conflicts with the concept of considering different land uses in the SCS. Recommend that this reference is updated to match the SCS.	
Metropolitan Transportation Commission	3.4	55	Model Calibration and Validation are very complex topics. The discussion of validation could do more harm than good by motivating the overfitting of models as opposed to a really good calibration process.	
Metropolitan Transportation Commission	3.6	67	Section 3.6 "RTP Travel Analysis Groupings" provides the clearest guidance. The rest of the chapter should be restructured to fit within those agency types.	
Metropolitan Transportation Commission	6.1	134	Strongly support the final prioritization as stated on p. 134, this is very important.	Comment Acknowledged
Metropolitan Transportation Commission	6.18	163	Staff is generally supportive of how MAP-21 and FAST Act requirements are being reflected in the guidelines as they are not yet defined. The State and the MPO must work together. It would be premature to include the congestion performance measures as they are far from being complete; however, the safety measures are now final and timeline for Caltrans to implement them has begun so they could be incorporated.	Comment acknowledged and incorporated in Section 6.20
Orange County Transportation Authority	1.1	3	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.	Comment incorporated
Orange County Transportation Authority	1.1	3	<ul style="list-style-type: none"> ● 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". ○ The goals are established at the local and regional levels, and can be influenced by state and federal requirements/recommendations. 	Comment incorporated
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> ● 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. ● The Guidelines state that SB 743 strengthens the connection between land use planning and transportation investments. ○ 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. 	Comment incorporated
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> ● B-30-15 has a target of 40% below 1990 levels by 2030, not 2050. ○ The EO recommendation to the "State" does not apply to MPOs. Please clarify this distinction. 	Comment incorporated
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> ● 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. ○ SCS-type strategies had a limited impact that dwindled over time. ○ 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. 	Comment incorporated
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> ● Consider removing the reference to CA Air Resources Board's model results showing VMT will have to be kept to a 5.5 percent increase. ○ This could easily change, as all modeling efforts include assumptions that can quickly change. ○ If it does stay in, please cite the source, so we know when it is outdated. 	Comment incorporated

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Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> • Again, consider stating that RTPs are used "to achieve local and regional goals", rather than "regional and state goals". 	Comment incorporated
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> • Please consider removing the phrase "substantial" when referencing the effect of transportation investments on travel patterns. o 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. 	Comment incorporated
Orange County Transportation Authority	1.1	4	<ul style="list-style-type: none"> • Again, in the last paragraph, it is not necessary to specify transportation investments, as there are many factors that influence travel. o 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. 	Comment incorporated
Orange County Transportation Authority	1.1	5	<ul style="list-style-type: none"> • 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. 	Comment incorporated
Orange County Transportation Authority	1.3	8	<ul style="list-style-type: none"> • 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. 	Comment incorporated - moved to Section 1.0
Orange County Transportation Authority	1.5	14	<ul style="list-style-type: none"> • Consider adding language preceding the list of SCS related actions, to clarify what this list contains. o 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... o Also under item 1, consider replacing the term "land use projections" with "land use strategies" or "scenarios". • Strike the addition of "and land use" in the last paragraph. o 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. 	Comment incorporated
Orange County Transportation Authority	1.5	15	<ul style="list-style-type: none"> o Under item 6 in the list, consider replacing "land use policies" with "land use strategies". 	Comment incorporated
Orange County Transportation Authority	1.6	16	<ul style="list-style-type: none"> • Consider striking the last line of the paragraph that states MPOs can anticipate guidance in the final proposal being developed by OPR. o MPOs should wait for the final rule before taking any action, as further public review and analysis is still required. 	Comment incorporated
Orange County Transportation Authority	2.2	24	<ul style="list-style-type: none"> • Consider changing the title of this section to "Background on State Climate Change Actions", since executive orders are not "legislation" 	Comment incorporated
Orange County Transportation Authority	2.2	24	<ul style="list-style-type: none"> • For item 2, under SB 375, consider revising the language from "will be achieved" to "can be achieved". 	Comment incorporated
Orange County Transportation Authority	2.3	27	<ul style="list-style-type: none"> • Please clarify that planning and implementing active transportation infrastructure, and supportive land uses, are primarily actions led by local jurisdictions. • 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. • 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. • Add language explaining the public health benefits associated with investments and strategies that improve air quality. o 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. o 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. 	Comment incorporated
Orange County Transportation Authority	2.7	32	<ul style="list-style-type: none"> • Consider beginning the Complete Streets discussion with "The term Complete Streets refers to a transportation network that is planned, designed..." o 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. 	Comment incorporated
Orange County Transportation Authority	6.13	157	<ul style="list-style-type: none"> The impact of land uses that support active transportation needs to be emphasized at least as much as the transportation network. 	Comment incorporated
Orange County Transportation Authority	6.14	159	<ul style="list-style-type: none"> Why change "operations & management" to "management and operations"? 	Comment Acknowledged
Orange County Transportation Authority	6.18	164	<ul style="list-style-type: none"> "Measured metrics" seems redundant. Consider just "metrics". 	Comment incorporated in Chapter 7

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Public Advocates (August 5)	2.6	30	First, we propose (for inclusion in chapter 2, section 6) this language on consistency of transportation projects, programs and plans with the RTP/SCS: 2. An MPO shall not incorporate into the RTP/SCS any project or program of projects proposed by an agency that is its subrecipient of federal or state funds unless that subrecipient, in its selection of that project, or its adoption of that program of projects, has (a) undertaken an accountable, inclusive and transparent process that complies with the region's adopted Public Participation Plan, (b) conducted an appropriate Title VI and Environmental Justice analysis of alternatives before selecting that project or adopting that program of projects, with the participation of affected low-income and minority residents, and, with respect to a program of projects, (c) determined that it will provide a fair and equally timely share of benefits to low-income residents and residents of color, and will not impose on them an unfair share of its burdens.	Comment incorporated in Section 4.2
Public Advocates (August 5)	2.6	30	First, we propose (for inclusion in chapter 2, section 6) this language on consistency of transportation projects, programs and plans with the RTP/SCS: 1. A non-exempt project included in an adopted Congestion Management Program or longrange countywide transportation plan is inconsistent with, and shall not be included by an MPO or RTPA in, the RTP/SCS, unless it will both (a) contribute to the RTP's reduction of GHG emissions and (b) demonstrably promote the land-use objectives of the RTP/SCS in general, and support transit-oriented affordable housing development in particular.	Incorporated in Section 6.16
Public Advocates (August 5)	4.1	99	Second, we propose the following best practice with respect to consistency of the RTP/SCS with local land use (for inclusion in chapter 4, section 1): <i>Best Practice: MPOs and RTPAs should provide financial incentives to those local governments that promote land-use and affordable housing production consistent with the SCS. Those incentives should make a portion of regional transportation funding available only to those local governments that (1) adopt an HCD-certified Housing Element and commit to implement its action programs and report annually on implementation progress, (2) produce a substantial portion of their lower-income RHNA need, and (3) adopt effective tenant protections and other anti-displacement policies to ensure that high-propensity transit riders are not displaced from transit-oriented locations.</i> <i>MTC's OneBayArea Grant Program (OBAG) has implemented elements of this best practice approach. As amended in July 2016, OBAG provides a policy framework for awarding federal funding to projects that reflect regional transportation priorities and that support the goals set forth in Plan Bay Area.</i>	Comment incorporated in section 6.25
Public Advocates (August 5)	NA	NA	SB 375 provides the legal basis for the first proposed provision, requiring consistency of projects with the SCS and its policies to reduce GHG emissions. As noted in the 2010 Guidelines, that section: provides that projects programmed for funding on or before December 31, 2011, are not required to be subject to the provisions required in Government Code Section 65080 (b)(2), a Sustainable Communities Strategy and Alternative Planning Strategy ... As a result, an MPO shall include exempted projects in their SCS for purposes of modeling the impacts of the RTP on regional greenhouse gas (GHG) emissions. These projects, however, are exempt from the internal consistency requirement. In other words, these projects may be included in the RTP even if they are inconsistent with the SCS or other policies to reduce regional GHG emissions. The July draft deletes this language and the entire section in which it appeared (2010 Guidelines § 6.16). That section should be restored and retained. In any event, the import of the statute is clear: projects that are not exempt from the internal consistency requirement may not be included in the RTP unless they are consistent with the SCS and its policies to reduce regional GHG emissions. The legal basis of the second proposed provision includes, among other federal sources, FTA's Title VI Circular, which provides that "[i]f the MPO passes planning funds through to one or more subrecipients, the MPO is responsible for ensuring those subrecipients comply with Title VI."	Comment incorporated - Section 6.16 was restored.
Public Advocates (July 29)	NA	NA	Public Advocates (July 29)	Comment incorporated
RTP Guidelines Stakeholder Group	NA	NA	RTP Guidelines Stakeholder Group Guiding Principles	Comment Acknowledged
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	3	45	Make the Modeling Process More Transparent and Inclusive of Active Transportation, Public Health and Social Equity (Ch. 3) We echo the comments made by Climate Resolve, Professor Bob Johnston and others on the modeling section of the Draft Guidelines. At a basic level, the models should incorporate non-auto modes of transportation and ensure that the models accurately estimate the impact of shifting more trips from cars to walking, bicycling and transit. The models should also estimate more than just trips from home to work, but also home to school (and work), trips to shopping and other destinations and more complex trip chains. The models should also incorporate equity and environmental metrics — these should not be run in a separate analysis for just the EJ analysis, but should be a core part of the scenario modeling. MPOs must provide a clear explanation of the modeling and analytical techniques applied in assessing the implications of the land use scenarios or other alternatives studied. The explanation should include a comprehensive list of assumptions and limitations of the data and modeling techniques. Open source data modeling tools provide the best opportunities for in-depth public participation. Finally, MPOs should analyze and transparently disclose the confidence and error levels associated with forecasted housing growth, as well as the consequences for GHG reduction and other performance measures of achieving less transit-oriented housing growth than their models predict. <i>Recommendations:</i> <ul style="list-style-type: none"> ● Identify tools such as Urban Footprint, ITHIM and other innovative models that MPOs are using to model transportation and land use scenarios. They integrate a range of health outcomes that can be helpful in assessing co-benefits of the RTP/SCS. ● Develop and employ best available travel-demand modeling to ensure accurate estimate of travel demand and support better decision-making about land use and transportation projects. ● Include basic economic equity measures in base year and in scenarios, such as distribution of household incomes, rent paid by household by income or by household income group, travel costs by trip purpose by household income group. ● Scenarios should also address impacts on disadvantaged communities. In order to assess impacts on disadvantaged communities it will be necessary for MPOs to identify data sources, survey data, or independently collect data that includes income data, race, ethnicity, and primary language data, as well as other demographic data. ● Community priorities must be included in the model and through off model strategies. In Fresno, Scenario D which came from community priorities did better in terms of GHG reductions and per capita co benefit than the scenario that was ultimately selected. 	

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RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	3	45	<p>Make the Modeling Process More Transparent and Inclusive of Active Transportation, Public Health and Social Equity (Ch. 3) <i>Recommendations:</i></p> <ul style="list-style-type: none"> ● Bicycle and walking behaviors are highly gender and age dependent. Many travel demand models are insensitive to demographic characteristics that make walking or cycling more or less likely. Models should explicitly take this into account. ● 11In the mode choice step, walk, bicycle, and drive access to and from transit should be explicitly represented. Calculating the duration of a transit trip should include, walk time, bicycle time, drive time, wait time, and in-vehicle travel time. ● Apply post-processing to adjust model outputs where the models lack capability, or are insensitive to a particular policy or factor. The most commonly referred to Post-processors include a "D's" post-processor for land use and health impacts models, but Post-processors could be developed for other non-D factors and policies, too. ● The section on calibration and validation is overly focused on motorized modes. This calibration and validation should apply to every mode. If walk and bicycle mode is not included, it may not be easy to identify situations in which mode switching to transit may have an unintended consequence of decreasing active travel. The average trip length by mode and purpose should be validated both in terms of time and distance. In addition trip length frequency distribution by mode should be validated with the observed data. Validation must include walking and bicycling travel, not just motorized modes, and validation documentation for all modes should be made publicly available. ● In the Co-Benefits of SCS section:12 <p>○ The language does not acknowledge the availability of validated models available for quantifying the health co-benefits and harms from different transportation strategies. ○ There needs to be a separate health and injury bullet in this section that refers to benefits of physical activity and air pollution reduction and potential injury risks to pedestrians and cyclists. ○ All MPOs should incorporate at least these three health impacts into their scenario assessments and modeling. Models that integrate these three health impacts are more informative than models that look at physical activity, air pollution, and road traffic injuries in isolation. Models that assess only physical activity without consideration of the unintended injury consequences are inadequate and misleading. ○ Models that examine health and other co-benefits of SCSs, when possible, should examine differential impacts in disadvantaged populations. Microsimulation is becoming increasingly available and affordable and offers opportunities to leverage exist TDM and ABM output for health and equity analyses.</p> <ul style="list-style-type: none"> ● MPOs should have an explicit process to assess the quality of the input data used in models and communicate data quality problems of statewide data sources to a central repository. They should also state how they dealt with data quality issues. For example, the California Household Travel Survey 2012 reports sample person 2529635-01 taking a 2,672 mile walk trip. There are many other examples of implausible trips in CHTS 2014. Errors of this magnitude are likely to impact calibration data for MPO models, as well as raise concerns on the integrity of the models. Procedures to impute missing and erroneous data should consider the national guidelines for processing travel surveys 	
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	1.4	10	<p>Support Inclusion of SB 743 Implementation in the Guidelines Section 1.4 regarding the "Purpose of the Regional Transportation Plan" includes a new section on changes to transportation analysis required by SB 743 (Steinberg, 2013). We support references to SB 743 here and other places in the Draft Guidelines, even though it is still going through rulemaking. SB 743 is a fundamental tool in the implementation of SB 375 because it removes Level of Service, and thereby congestion from cars, from consideration in environmental review of transportation projects. It replaces LOS with Vehicle Miles Traveled, which tracks closely with greenhouse gas emissions and thus promotes coordination between State climate goals and local implementation of the RTP/SCS. Many of our groups have been engaged in the process to develop the changes to CEQA regulations impacted by SB 743, and have submitted comment letters, including one in March 2016, to support and strengthen the guidelines. SB 743 will help promote active transportation, public health, social equity and infill, and transit-oriented development, which are also goals of the SCS. Thus, we encourage CTC and Caltrans to keep reference to SB 743 in the final RTP Guidelines document.</p> <p>We also recommend expanding the guidance in Section 1.4 to ensure regional agencies comply with SB 743 in analyzing the VMT impacts of the transportation investments in their RTPs. The Air Resources Board's VISION model, which was used for development of the CTP 2040, demonstrates that statewide VMT cannot exceed roughly a 5 percent increase by 2030, in addition to reasonable fuel and vehicle efficiency improvement predictions, in order for the state to reach the GHG reduction target established in Executive Order B-30-15. Each MPO should develop a VMT reduction target for their RTP based on this statewide maximum allowable VMT increase to ensure that the state will meet its goal across all regions and transportation investments.</p>	Comment acknowledged
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	2.3	26	<p>Provide Guidance on Integrating Public Health Framework for Transportation Planning (Sec. 2.3 and Appendix L) Section 2.3 on Public Health seriously understates the scientific evidence of how the transportation system impacts health. It needs to be clearly stated that the biggest health impacts of the transportation system are on physical activity and chronic disease reduction.6 Transportation-related physical activity, air pollution, and road traffic injuries are inter-related, but, given prevailing levels of air pollution in California, the greatest health gains will be through active transportation accompanied by safety improvements for pedestrians and cyclists.7 Specific recommendations for improving Sections 2.3 and Appendix L include:</p>	Comment incorporated
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	2.3	26	<p>Provide Guidance on Integrating Public Health Framework for Transportation Planning (Sec. 2.3 and Appendix L) ● Require Public Health Element in RTPs: While Appendix L of the draft Guidelines is a good start, we desire to see public health better integrated into the planning process as intended by AB 441 (Chapter 365, Statutes of 2012), Gov. Code 14522.3. At a minimum, we recommend that Section 2.3, Promoting Health, include additional discussion on the links between active transportation and public health, as well as additional language on the co-benefits of investing in transportation projects that reduce greenhouse gas emissions and improve the social determinants of health. This discussion can then be further expanded upon in the narrative and in the case studies in Appendix L. We also strongly recommend that the Guidelines require RTPs to include a Public Health element. This element would include, at a minimum, discussion of physical activity and related health outcomes, air pollution and related health outcomes, and bicycle, pedestrian and motor vehicle injuries and fatalities related to traffic collisions. Additionally the element should include noise, access to essential services and health impacts associated with GHG emissions reductions and other transportation-related impacts on the social determinants of health.</p>	Unable to incorporate without statutory citation
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	2.3	26	<p>Provide Guidance on Integrating Public Health Framework for Transportation Planning (Sec. 2.3 and Appendix L) ● Leverage Appendix L to Provide a Public Health Framework for RTP Analysis: The first draft of Appendix L does not provide any guidance to MPOs on how to integrate a public health approach to transportation planning, decision-making, and investments. Instead, the current Appendix L simply summarizes examples of what MPOs are already doing to promote public health, namely investments in active transportation and Safe Routes to School. This approach misses the opportunity to provide a primer to transportation planners on the social determinants of health and how transportation directly impacts public health and social equity. For example, while transportation planning has historically viewed its role impacting health as limited to air quality and safety impacts, there are a plethora of other situations where transportation directly and indirectly impacts population, including but not limited to: transportation affordability (particularly in terms of accessing employment, health care services, and other critical community destinations) and the limited mobility and disconnected transportation networks created by highways and freight corridors that physically and psychologically separate communities, impacting social cohesion and connectedness. We recommend Appendix L incorporate a broad discussion of transportation and its impact on public health and a discussion of recommended health-transportation performance indicators8 in addition to the current draft's summary of current MPO efforts. Additionally, utilizing the California Health Disadvantaged Index (http://phasocal.org/ca-hdi/) as a resource to prioritize targeted funding decisions will have further health benefits in connecting health to transportation investment.</p>	Comment incorporated

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RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	2.6	30	<p>Encourage Greater Consistency of the RTP with State, County, Local and Other Plans (Sec. 2.6-7) As noted in Section 2.6, it is "very important that the RTP be consistent with other plans prepared by local, state, federal agencies and Native American Tribal Governments." The RTP should be a shared vision for the future of each region, and as such it should both align with other plans and encourage compliance with the RTP. Local accountability and implementation of the RTP/SCS has been a major challenge, as many of us have seen a lack of nexus between the RTP/SCS and local plans and policies. In multi-county regions, the RTP/SCS policies and recommendations for reducing GHG emissions, shifting to alternative transportation and growing more compactly are not always reflected in local and county plans. For instance, ClimatePlan released a report in May entitled "Toward a Sustainable Future: Is Southern California On Track?" that looked at the implementation of the SCAG RTP/SCS since 2012 and found that the county transportation commissions had not incorporated many of the GHG reduction strategies in their own long-range transportation plans. We respect local control over land use and that many transportation investment decisions are "bottoms up," but we also see a need to hold local and county governments more accountable to the RTP/SCS and share a commitment to reducing GHG emissions and VMT. We will not achieve the State's ambitious climate goals and the mandates of SB 375 if there is no incentive for compliance with RTPs from counties and municipalities that comprise them.</p> <p>The ClimatePlan report recommends the following four things need to happen to encourage consistency:</p> <ul style="list-style-type: none"> ● Connect transportation decisions to their impacts on the climate and communities; ● Invest more and sooner in public transit, biking, and walking; ● Convene leaders and get better data to support action; ● Step up: Regional planning is "bottom up," and this means that every county, city, and town must do its part for the region to succeed. 	Comment Acknowledged
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	2.6	30	<p>Encourage Greater Consistency of the RTP with State, County, Local and Other Plans (Sec. 2.6-7) With the new California Transportation Plan 2040, we have a guiding framework for the entire state's transportation investments, and we are encouraged that additional language has been added to the RTP Guidelines referring to that document and its goals and strategies. There are many other plans referenced in the document (and also in the CTP) that show how all of these various plans and processes are aligned, but ultimately, they depend on implementation and we are not seeing it to the level it needs to happen.</p> <p>We support the recommendations made by Public Advocates in their separate comment letter on consistency. Specifically, the RTP should be consistent with the CTP, 14 local projects & plans, 15 the RHNA16 and local land use. 17 The new guidelines should, at a minimum, specify standards against which regional and state agencies can assess and ensure consistency in each of these four areas. The Guidelines should also encourage compliance by identifying incentives for local and county planning agencies to align their investments with the RTP/SCS. We support Public Advocates' language suggestions that</p> <p><i>MPOs and RTPAs should provide financial incentives to local governments that promote land-use and affordable housing production consistent with the SCS by making a portion of local transportation infrastructure or other funding sources available only to those local governments that (1) adopt an HCD-certified Housing Element and commit to regular reporting and public hearings on implementation, (2) produce a substantial portion of their lower-income RHNA need, and (3) adopt effective tenant protections and other anti-displacement policies to ensure that high-propensity transit riders are not displaced from transit-oriented locations.</i></p> <p><i>MTC's OneBayArea Grant Program (OBAG) has implemented elements of this best practice approach. As amended in July 2016, OBAG provides a policy framework for awarding federal funding to projects that reflect regional transportation priorities and that support the goals set forth in Plan Bay Area.</i></p> <p>There is also no mention of Safeguarding California or guidance issued by State agencies on climate change including the Coastal and Sea Level Rise Guidance; Extreme Heat Guidance. The coordination of climate mitigation and adaptation should be an explicit part of the RTP/SCS planning process. Smart growth in areas impacted by sea level rise will not achieve greenhouse reduction targets. Compact development that exacerbates urban heat island production needs to be considered as well as making transportation infrastructure resilient (e.g. cool pavement, tree shading of sidewalks and bicycling lanes).</p>	Comment incorporated in section 6.25
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	2.7	30	<p>Strengthen Complete Streets and Active Transportation Guidance to Empower MPOs and Incentivize Innovation (Sec. 2.7 Complete Streets, Sec. 6.13 Modal Discussions)</p> <ul style="list-style-type: none"> ● Alignment with General Plan Guidelines: We support the inclusion of the recent update to the General Plan Guidelines, the state's complete streets requirement (AB 1358), and the overview of the benefits of complete streets. ● Strengthen Complete Streets Guidance: We support the direction to MPOs to integrate complete streets where feasible (p. 33) that has been incorporated into the current draft Guidelines; however, this neither goes far enough nor recognizes what many MPOs are already doing to advance complete streets. For example, many MPOs have incorporated complete streets principles into their RTP/SCS, while some have even made local compliance with AB 1358 a prerequisite for accessing regional funds. MPOs should be explicitly empowered to encourage increased local compliance with AB 1358, as well as to encourage multimodal transportation investments. Accordingly we recommend revising the language on p. 33 to read "To the maximum extent feasible." 	Comment incorporated
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	2.7	30	<p>Strengthen Complete Streets and Active Transportation Guidance to Empower MPOs and Incentivize Innovation (Sec. 2.7 Complete Streets, Sec. 6.13 Modal Discussions)</p> <ul style="list-style-type: none"> ● Integrate First/Last Mile Considerations: The current draft Guidelines lack mention of providing first and last mile connections to public transportation. The first and last mile are often overlooked yet fundamentally important to increasing transit mode share and reducing vehicle miles traveled. We recommend the Guidelines include language and guidance on first and last mile connections to transit in the Modal Discussion section, as well as reference emerging examples of such planning around the state. 5 We have included a list of emerging practices, resources, case studies in Appendix A to this letter. ● Encourage Regional Funding for Active Transportation: We recommend the Guidelines include a discussion of how active transportation projects are eligible for a variety of state and federal funding streams that are managed by the MPOs, including the Active Transportation Program, Congestion Mitigation and Air Quality (CMAQ) program, and the Surface Transportation Program (STP). Emerging practices such as the OneBayArea Grant program should be highlighted, as well as including health benefits of projects in grant programs (as the ATP does). ● Update Best Practices Section: Many of the resources listed in the active transportation and complete streets sections are several years old, and many new reports and best practices have been created since 2010. We have recommended a series of new reports and case studies in Appendix A. 	Comment incorporated in Section 6.10 and Appendix M
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	4.1	99	<p>Increase Access and Public Participation to the RTP Process (Sec. 4.1 and 4.4) The Guidelines should identify both what to do and what to avoid in conducting public participation. In addition to the list of items in Section 4.1 (top of p. 100), we also recommend the following be added:</p> <ul style="list-style-type: none"> ● Proactively work with and/or provide financial support to community-based and membership organizations across the region to help engage low-income residents and residents of color in the public process and to jointly plan public workshops or other engagement opportunities. The Fresno COG competitively awarded small amounts (\$1,000 - \$3,000) of competitive funding to such organizations during the development of their 2014 regional transportation plan/sustainable strategy for this purpose and the results were promising. ● Form an advisory group on Environmental Justice, Social Equity and/or Disadvantaged Communities that includes policy and community-based organizations that are focused on social equity in the region to provide feedback throughout the RTP process. ● Ensure that community residents have the opportunity to deliberate together to achieve consensus on their most pressing needs and recommendations. 	Comment incorporated in Section 4.3 and Appendix M
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	4.1	99	<p>Increase Access and Public Participation to the RTP Process (Sec. 4.1 and 4.4)</p> <ul style="list-style-type: none"> ● Ensure Meetings are Convenient and Accessible: Hold multiple public meetings at times and locations that allow a diverse range of individuals and organizations, including communities with various family and work schedules, to attend such as meetings in the evening and on the weekends. Consider holding meetings at public facilities such as libraries, community centers, or neighborhood organizations that people are already familiar with and which are convenient to other destinations they may have to go before or after the meeting. Avoid holding public meetings during the day if feedback from the community is sought. Avoid government office buildings that require photo ID and security to enter. Ensure that interpreters are available when holding meetings in communities with a large population of people with English as a second language or who do not speak English at all. Translate materials, including electronic communications and invitations, to Spanish and other languages where appropriate. ● Technology and the Internet can reach many people, but recognize that not everyone has access to the Internet and an email address and that efforts should be made to reach individuals in other ways. As noted above, community groups should be resourced to conduct outreach. Other strategies for notifying low-income communities of public meetings that should be encouraged include posting flyers in multiple languages as needed, in high-foot traffic areas, schools, and community events, and mailing invitations in multiple languages as needed. 	Comment incorporated in Section 4.3 and Appendix M

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RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	4.1	99	<p>Increase Access and Public Participation to the RTP Process (Sec. 4.1 and 4.4)</p> <ul style="list-style-type: none"> ● Provide childcare, food, and other amenities, or resource local community groups to do so. ● Add to the meeting agendas of neighborhood/community based organizations to facilitate a meeting where residents will be available, providing resources to the organization to assist. ● Use meeting locations within access to public transportation, walking and biking routes in addition to parking when selecting a facility. Many times agencies choose locations based on access to parking and busy routes like freeways, which are not as convenient for people who depend on public transportation or other modes. Neighborhood and community based organizations and schools may let you use their meeting space. ● Consider neutral professional facilitation of public meetings to manage conflict and keep the meetings running on time. ● As part of public process materials should be provided ahead of time and draft work product should be shared. In the past, even with special committees to guide the process, organizations were receiving materials right before the meeting and then expected to make decisions on the spot. In some cases, modeling data wasn't shared until it was finalized. ● Public participation should also include ability to access underlying data on populations (household and person files) and travel patterns (trip lists with time and distances of trip segments) to statistically describe the baseline and alternative scenarios by mode and other characteristics. This approach may better address specific questions of the public and complement limited analytic resources of MPOs. 	Comment incorporated in Section 4.3 and Appendix M
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	4.2	100	<p>Need for Robust Guidance on Equity, Civil Rights, & Environmental Justice (Sec. 4.2, 4.3 and 4.4)</p> <p>The current draft Guidelines simply quote from federal civil rights and environmental justice laws and requirements, but provide no meaningful guidance on how to operationalize these requirements. Accordingly, we strongly urge you to include a separate chapter in the Guidelines to provide the space necessary for discussing the federal and state requirements, as well as best practices, relating to civil rights and environmental justice. Many of our organizations have endorsed Principles to Guide the RTP Guidelines update, and we look forward to working with you to integrate the separate Civil Rights chapter submitted by Public Advocates, with additional text as appropriate. We also have the following recommendations:</p> <ul style="list-style-type: none"> ● Update RTP Checklist to Meaningfully Screen for Compliance with Title VI & Environmental Justice Laws: The current RTP checklist contains a single yes/no question for whether a MPO has met its Title VI and Environmental Justice obligations. As these issues are complex and multifaceted, using a single question to capture compliance is not sufficient. The Checklist should have detailed questions on how the needs of low-income and minority households were solicited and considered, as well as how the plan overall works to ensure that low-income and minority households are receiving equal benefits, on an equally timely basis, as other populations. We support the sample language for the Checklist submitted by Public Advocates as a starting point, and have several other suggestions in the Appendix B to this letter. ● Address Jobs-Housing Fit, Economic Opportunity and Development. The Guidelines do not provide much information on how MPOs should address regional jobs and economic development. While some MPOs do prepare an analysis of jobs-housing fit, jobs generated by transportation projects in the RTP and return on investment of making the RTP/SCS decisions, the Guidelines could provide a clearer framework for MPOs to address economic issues. In our meetings with local stakeholders, we heard loud and clear that economic and workforce issues are very important, and the Guidelines need to address that. RTPs are long-range plans that will take our regions through multiple booms and busts, and they should ensure that the transportation system can handle these cycles and ensure that everyone can access jobs with a reasonable, affordable commute. 	Comment incorporated in Appendix C
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	4.2	100	<p>Need for Robust Guidance on Equity, Civil Rights, & Environmental Justice (Sec. 4.2, 4.3 and 4.4)</p> <ul style="list-style-type: none"> ● Prioritize Economic Benefits for Communities of Greatest Need. The RTP Guidelines can also result in economic benefits to low-income communities and communities of color across California through workforce development opportunities and job creation. Transportation investments have the potential to achieve triple bottom line returns to communities and regions across the state by increasing transportation access while expanding economic opportunity for communities with high levels of unemployment and poverty. Specifically, the RTP Guidelines can and should encourage MPOs to target training and employment opportunities to youth and young adults that need them the most. For example, in the development of an RTP, MPOs should prioritize transportation projects that recruit, train, and/or hire individuals with barriers to employment and that utilize workforce development and hiring strategies that are designed to achieve these outcomes such as: <ul style="list-style-type: none"> ● Project labor agreements with targeted hire commitments ● Community workforce agreements ● High-road agreements ● Caltrans' Local Labor Hiring Program ● Partnerships with community-based workforce development and job training entities that have a track record of success serving disadvantaged populations and/or have demonstrated a high job placement rate among trainees from disadvantaged communities. ● Partnerships with pre-apprenticeship, state certified community conservation corps, "earn-while-you-learn" models, and/or YouthBuild programs; and/or registered apprenticeship programs that lead to industry recognized credentials, certifications and/or references for the long term unemployed. ● Partnerships with local Workforce Development Board programs serving disadvantaged populations. <p>This will ultimately boost education and employment outcomes for the state, grow local and regional economies, and support our national transportation objective to create ladders of opportunity as directed by Secretary Foxx through DOT's Local Hire Pilot Program. This also creates greater alignment with the workforce goals of California's Sustainable Freight Action Plan and the Workforce Innovation Opportunity Act state plan administered by the California Workforce Development Board.</p>	Comment incorporated in Section 4.3
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	6.11	147	<p>Identify the Impacts of Freight Investments on Health Outcomes in Disadvantaged Communities (Sec. 6.11 on Goods Movement, other sections throughout)</p> <p>We reiterate the comments submitted by the California Clean Freight Coalition (CCFC) on the RTP Guidelines. The Guidelines present a unique opportunity to go beyond the traditional confines of guidance documents and direct comprehensive freight emissions reductions that would generate positive health outcomes in the communities which would most benefit from improved land use planning and infrastructure investments.</p> <p>Communities located in the center of trade corridors, near freight facilities, experience heightened risk of a myriad of negative health outcomes. Freight equipment accounts for nearly half of statewide emissions of diesel particulate matter and nitrogen oxides (NOx) as well as compounding to hazardous ozone levels. According to the American Lung Association, inhaling ozone can lead to shortness of breath, chest pain, coughing, wheezing, inflammation of the lungs, asthma attacks, and premature death. Ozone pollution can also cause permanent scarring of the lungs. In addition to these findings, EPA has found a "suggestive" causal relationship between ozone and harm to the central nervous system and reproductive system. Those at greatest risk of suffering from the adverse consequences of breathing ozone include children, the elderly, and individuals with asthma, and people who work or exercise outside.</p> <p>Detrimental impacts on Air Quality are only a facet of the multiple challenges that should be integral components of guidance provided on goods movement in the Draft Guidelines. Numerous studies clearly demonstrate the strongest correlation between a community and air quality is race, not income. The overwhelming majority of residents living in close proximity to freight hubs are communities of color. The Goods Movement industry and the detrimental air pollution have long been and continue to be significant environmental justice issues.</p> <p>We advise the Guidelines include all recommendations presented by CCFC as well as the following:</p> <ul style="list-style-type: none"> ● Disaggregated analysis of the impacts of Freight: The sections related to the goods movement should include a comprehensive analysis disaggregated by race, place and income of air quality standards and health impacts in the State's major freight corridors. ● Guidance to curb logistics sprawl, particularly in disadvantaged communities: Land use as it related to goods movement should place particular emphasis on ensuring logistics centers do not increase socio-economic and/or environmental burdens in the State's Disadvantaged communities. The Guidelines should provide clear criteria, based on socio-economic, health and air quality assessments, that ensure future logistics centers are not placed within or adjacent to over-burdened communities. ● Guidance for sensitive land use mitigation: As cited, vulnerable populations are at greater risk from suffering from the detrimental health outcomes related to freight. It would follow that the Guidelines should provide explicit guidance on necessary mitigation measures for sensitive land uses such as schools, hospitals and housing. 	Comment incorporated

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RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	6.11	147	<p>Identify the Impacts of Freight Investments on Health Outcomes in Disadvantaged Communities (Sec. 6.11 on Goods Movement, other sections throughout)</p> <p>Best Practices: The Community of Mira Loma Village, in Western Riverside County, was situated in close proximity to industrial development, one community survey identified over 800 freight vehicles per hour circulating less than 30 feet from homes. Community Based organizations presented litigation challenging the approval of industrial development by the County of Riverside prior to the City's incorporation. As a result of the litigation the City of Jurupa Valley's Environmental Justice (EJ) element was adopted November 6, 2014. The outcomes provided mandatory reductions in disproportionate environmental burdens affecting low-income and minority population. Some examples of enforceable requirements are:</p> <ul style="list-style-type: none"> • The City is instituting a mitigation measure by developing a Restricted truck route that will remove 800 trucks an hour off the street less than 30 feet of homes. • The City participated in the Installation of High Performance Air Filtration systems in homes of the targeted area resulting in a 90% reduction of exposure to diesel pollution. • All proposals for new sensitive land uses incorporate adequate setbacks, barriers, landscaping or other measures as necessary (such as high performance air filters) to minimize air quality impacts; and are located adequate distances from freeways and major roadways. 	Comment incorporated
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	6.18	163	<p>Identify Consistent Performance Measures for All MPOs to Use (Sec. 6.18)</p> <p>In addition to the new federal performance measures, some of which are still going through rulemaking, we encourage Caltrans and CTC to identify performance measures that are consistent with the CTP and SB 375, and that also address social equity, environmental justice, alternative transportation modes, public health and safety. In addition to the list provided in Section 6.18, the Guidelines should also provide sample indicators and recommended baseline measures so that MPOs are consistent with the performance measures they are using and also reporting their progress in the same way. Performance measures can also help to see if the regions are meeting the goals of SB 375 and other policies and strategies identified in the RTP/SCS, and allow MPOs to report on a regular basis to the public on how they are doing.</p> <p>We also know that some of the federal performance measures will not go far enough, and may even be contrary, to many of the State's climate goals and transportation policy goals. For example, the system performance measures currently in rulemaking focus solely on congestion. Some of our organizations, including the Safe Routes to School National Partnership submitted comments to encourage a more people-based measure and also to focus on VMT and GHG emission reductions instead of on travel time delay. In the event that the FHWA keeps the performance measures as is, we still encourage Caltrans and CTC to identify measures that will actually meet our goals and be aligned with state policy so that we have adequate measurement of how we are doing.</p> <p>In addition, the Health in All Policies Task Force developed a list of Healthy Communities Indicators using a healthy communities framework. These should be explicitly referenced in the Performance Measures section or listed as a Best Practice.</p>	Comment incorporated in Chapter 7
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	6.22	170	<p>Incorporate Best Practices from Existing Sustainable Communities Strategies (Sec. 6.22-6.28; Appendix I)</p> <p>When SB 375 was adopted in 2008, it transformed how regions would plan for land use and transportation by mandating regions to adopt a greenhouse gas emission reduction target. In addition to reducing greenhouse gas emissions, these targets also provide meaningful health and equity co-benefits. In the past eight years, regions have developed visionary plans that include a number of strategies to meet the goals of SB 375 — as well as the state goals, including the Governor's Executive Order B-30-15, AB 32, and countless others. The RTP guidelines should elevate the best practices from these visionary documents to provide guidance to MPOs so they can meet our state's ambitious climate goals.</p> <p>Key best practices that should be included in the RTP guidelines are:</p> <ul style="list-style-type: none"> • Better guidance on scenario development: MPOs should use the scenario development process to host a discussion with community residents — and interested stakeholders — on how and where the region should grow. As a part of this process, the scenarios should prioritize the needs of the most vulnerable populations and underserved communities. This will ensure that the regional transportation plan is informed by community residents, and is better equipped to meet the needs of the community. Specifically, we recommend: <ul style="list-style-type: none"> ○ Inviting stakeholders to create and/or define the scenarios ○ Ensure the scenarios represent distinct visions ○ Tailor the transportation project lists for the scenario, versus using the same transportation list for each scenario ○ Ensure data and modeling assumptions are transparent and accessible to the public ○ We recommend reviewing (and potentially including) MTC's Equity, Environment, and Jobs (EEJ) scenario in 2013 as one way to achieve this recommendation. • MPOs use performance targets: MPOs should adopt a focused list of performance targets to communicate to both policymakers and community residents the impact of various scenarios and how it compares to the region's goals. This will help members of the public understand the differences between scenarios, and the impact on the region. Specifically, we recommend: <ul style="list-style-type: none"> ○ Performance targets should be selected with extensive public input ○ There should be a clear distinction between these targets and the performance measures ○ The performance targets should be presented as a short list, understandable, and targeting impacts in topic areas such as public health, equity, and conservation versus transportation metrics 	In process of incorporating in Appendix I/M
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	6.22	170	<p>Incorporate Best Practices from Existing Sustainable Communities Strategies (Sec. 6.22-6.28; Appendix I)</p> <p>We recommend reviewing (and potentially including) MTC project performance assessment, which includes performance targets; Fresno COG's focused list of performance measures, as well as SANDAG's Integrated Transportation and Health Impacts Model (ITHIM) as ways to achieve this recommendation.</p> <ul style="list-style-type: none"> • Shift funds away from road expansion to road maintenance, transit operations, active transportation, vanpools, and other programs that lower per capita VMT and meet the goals of SB 375: Historically transportation funding has prioritized road expansion and highway construction. To achieve the goals of SB 375 — and meet our ambitious climate laws — MPOs will need to prioritize transportation funding for road maintenance, and accelerate investments in transit operations and maintenance, active transportation, and other transportation programs that will reduce VMT. • Accounting for GHG emissions in the SCS: At the center of SB 375 and the joint RTP/SCS is the goal to reduce vehicle miles travelled through more compact and smarter land use and the corresponding transportation mode shift to accommodate that improved land use pattern. These GHG reductions are to be beyond that of other GHG reduction mandates and mechanisms in other sectors, and are disproportionately important because of the many co-benefits to ecological and human health that improved land use can provide. However, in the many admirable RTP/SCSs that have been adopted thus far, there has been an extreme lack of illustration in the respective EIRs of where the ultimate projected GHG reductions are coming from exactly — specifically, which GHG reductions can be attributed directly to land use change and VMT reducing strategies vs. non-VMT oriented strategies (for example, increased EV use). Recognizing the complexity involved, guidance is greatly needed for how MPOs can and should be able to better account for what strategies their GHG reductions are associated with to ensure effectiveness of the SCS, in accordance with the goals of SB 375. In terms of reducing greenhouse gas emissions and vehicle miles traveled, the Guidelines should facilitate greater mode shifts to active and public modes of transportation, as well as land use recommendations that promote equitable infill and transit-oriented development for all income levels instead of sprawl. • Addressing Housing Needs in the SCS (p. 175): SB 375 mandated shifts to more concentrated development patterns that reduce sprawl in favor of urban density. However, these shifts are also causing and, in many cases, exacerbating affordable housing and displacement issues by concentrating investment for infill in low income areas that are mostly communities of color. Planning and investment in transportation must explicitly account for, and to the greatest extent possible, seek to avoid or mitigate displacement and lack of affordable housing. Especially since research shows that when existing residents are displaced due to unaffordable housing near transit, GHG emissions increase due to higher income residents — with cars — moving into those spaces. The guidelines should provide greater guidance and assistance on how to address housing needs in each region, especially in light of HUD's new rule on Affirmatively Furthering Fair Housing. We recommend the Guidelines state that land use forecasts and transportation investments should take into account, and help reduce the threat of displacement. Fully incorporating displacement into SCS scenario modeling can help to identify land use and transportation options that could help to address displacement and other disparities. We recommend reviewing (and potentially including) ABAG and MTC displacement analysis as one way to achieve this recommendation. • Considering Social Equity in SCS (p. 180): As mentioned above, we encourage Caltrans and CTC to include additional language on social equity and environmental justice in the Guidelines and to add a separate chapter. We also encourage MPOs to use the public participation process to shape the social equity sections of the RTP and ensure that they adequately address community needs, benefits and burdens. 	Comment in process of incorporating in Appendix I/M

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RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	NA	NA	<p>Institutionalize Public Health Review of RTPs</p> <p>We recommend that in the Consultation & Coordination chapter, the Guidelines require, or at least strongly encourage, coordination and consultation with public health departments in preparing the RTP. Public health departments can provide valuable feedback throughout the process and ensure that public health is integrated throughout the RTP. This has worked well in the Active Transportation Program, where public health departments have been actively engaged in many regions with helping ATP applicants prepare their applications and address the public health questions. Public health departments can also assist with emerging practices, such as comprehensive health impact assessments in scenario modeling, project-level health impact assessment, and identification of project-level health and climate impacts and health and climate resiliency benefits. The modeling should include, at a minimum, the health impacts associated with air pollution, physical activity related to active transportation, and pedestrian and bicyclist injuries/fatalities. Health outcomes should at a minimum include asthma and other respiratory diseases, cardiovascular disease (including stroke, ischemic heart disease, hypertensive heart disease), diabetes, osteoporosis, lung-colon-and breast cancer, depression, dementia, and obesity. For climate resiliency, consider language on the importance of shading, cool pavements (e.g. bike lanes/walk infrastructure) and shading for bus stops, etc. to foster active transportation even in the face of rising temperatures, as well as drinking water access.</p>	Comment incorporated
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	NA	NA	<p>Incorporate Conservation of Natural and Working Lands into the RTP Guidelines (multiple sections)</p> <p>Conservation of natural and working lands can help meet SB 375's stated goal of reducing per capita greenhouse gas (GHG) emissions through "changed land use and improved transportation." A recent study from American Farmland Trust, for example, found that reducing California's rate of farmland conversion by half within a decade "would avoid the emission of a cumulative total of 55 million metric tons of greenhouse gases, equivalent to avoiding emissions from more than 129 billion vehicle miles traveled." Other studies have found that per-acre emissions from rangeland are up to 217 times lower than those from urbanized areas; that more compact patterns of development are likely to support lower per household vehicle miles traveled (VMT) in seven of the eight metropolitan planning organization (MPO) regions of the San Joaquin Valley; and that natural landscapes such as oak woodlands can sequester millions of tons of carbon.</p> <p>Natural and working lands provide other benefits as well. Eight percent of the U.S. food supply by value is produced in California's Central Valley, and crop receipts alone bring billions of dollars a year into many MPO regions, underlining the importance of working landscapes to both food security and job creation. Resource areas and farmland also support groundwater recharge, water treatment and wildlife habitat, make communities more livable, and contribute to public health.</p> <p>In order to realize these benefits, we strongly support the recommendations made in the August 3, 2016 comment letter submitted by The Nature Conservancy (TNC) and Sequoia Riverlands Trust (SRT). These include, but are not limited to, incorporating best practices identified in Sustainable Communities Strategies and Conservation: Results from the First Round and Policy Recommendations for Future Rounds (available at http://www.southernsierrapartnership.org/scs-policy-report.html). Like TNC and SRT, we urge you to incorporate this valuable resource into the RTP Guidelines.</p>	Comment incorporated
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	NA	NA	<p>Require Greater Transparency in Sequencing of Transportation Projects in the RTP</p> <p>The Guidelines should ensure that the regional investments and policies that are expected to achieve the mandates of SB 375 are specified clearly and transparently, and are front-loaded in the early years of the plan. Where actions are assumed to be taken by others, the basis for that assumption should be made clear.</p> <p>For example, in many Central Valley MPO RTPs, transportation projects were simply rolled over to the financially constrained project list, and scoring criteria and land use patterns were revised to justify those projects. We recommend the Guidelines add language that MPOs should do the opposite: look at land use patterns, adjust scoring criteria and then incorporate the transportation network.</p> <p>The RTP Guidelines should also state that MPOs transparently list the timing of major investments, so it is clear which are front-loaded. A financial plan that clearly enumerates early horizon projects should be clearly present. This plan should also identify those projects which are 'rolling' over from previous plans.</p>	Comment incorporated in Section 6.2
RTP Guidelines Stakeholder Group Comment Letter (August 5, 2016)	NA	NA	<p>Provide Greater Guidance for Rural Areas Within MPOs</p> <p>SB 375, Cap and Trade, and various existing programs and policies offer sophisticated definitions, CEQA incentives and financing instruments for equitable "transit oriented development" in an urban setting. Yet, an equivalent regulatory framework has not been provided for small towns and rural communities where high frequency transit and/or high density development, as defined in an urban setting, may never exist. Much greater guidance and incentives are needed for development of alternative low-VMT land use and transportation strategies specific to a rural setting.</p> <p>The Guidelines should ensure that growth and transportation investments in rural communities reduce greenhouse gas emissions as well. An RTP/SCS should include policies and programs that direct investments to these communities to plan for growth in ways that improve sustainability and access to jobs and services. We don't want to see GHG reductions - and co-benefits - to more urban areas come at the expense of low income rural communities.</p>	Incorporated in Section 6.26
RTP Guidelines Stakeholder Group Comment Letter (June 29, 2016)	NA	NA	RTP Guidelines Stakeholder Group Comment Letter (June 29, 2016)	Comment Acknowledged
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 an 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>	Comment incorporated
Sacramento Metropolitan Air Quality Management District	4.6	107	The MPO shall provide the following interested parties with reasonable opportunity to comment on the proposed RTP Add: "Representatives of local public health"	Comment incorporated
Sacramento Metropolitan Air Quality Management District	5.7	115	<p>Transportation Control Measures</p> <p>In section 5.7 addressing air quality and transportation conformity, the District recommends including text to recommend transportation control measures (TCMs) that support State Implementation Plan (SIP) implementation through mechanisms to promote movement from single occupancy vehicles to more sustainable modes of transportation. This could be added to the paragraph on best practices on page 129, as follows: <i>Metropolitan Planning Organizations should work with local air districts to develop transportation control measures that include mechanisms to promote movement from single occupancy vehicles to more sustainable modes of transportation, in support of State Implementation Plans.</i></p>	Comment incorporated

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Sacramento Metropolitan Air Quality Management District	6.1	131	<u>Performance Measures</u> The District recommends adding public health and air quality to list of performance measures, for examples in chapter 6, sections 6.1 and 6.18. In earlier correspondence we recommended adding measures of public health to the list in section 6.1; we also recommend adding "Public Health" to the first list in section 6.18. Further, we recommend adding "Measures of environmental quality such as air quality" to the list in section 6.1 Measures of public health outcomes in RTPs must be easily obtainable, with easily measurable indicators. The District recommends those provided in the California Health Interview Survey (CHIS). Following is example text to add to section 6.18's best practice discussion: <i>Public health performance measures must be easily obtainable and measurable, such as those provided by the California Health Interview Survey (CHIS) a random-dial telephone survey with representative public health data on all 58 counties in California. This CHIS is available at http://healthpolicy.ucla.edu/chis/about/Pages/about.aspx</i>	Comment incorporated in Chapter 7
Sacramento Metropolitan Air Quality Management District	6.1	134	Although not required by law, MPOs should identify a set of indicators that will be used to assess the performance of the RTP, including, but not limited to, all of the following: Add "Measures of impact on public health"	Comment incorporated
Sacramento Metropolitan Air Quality Management District	6.9, App C	145, 199	<u>Modal Discussion</u> The District recommends that the "Modal Discussion" section in chapter 6, section 6.9, and in the Appendix C checklist include a public health listing as follows Section 6.9: <i>The benefits of active transportation and how the RTP supports active transportation planning</i> Appendix C, first section: <i>Does the RTP include a discussion of public health, including active transportation and reduction of mobile source air toxics exposure?</i>	6.9 suggestion comment incorporated; unable to incorporate RTP Checklist question without statutory citation
Sacramento Metropolitan Air Quality Management District	6.13	157	<u>Mobile Source Air Toxics</u> The District recommends discussion of mobile source air toxics (MSATs) in the Draft Guidelines, including near-roadway exposure. Following is example text that could be inserted as a section entitled "California Air Resources Board Air Quality and Land Use Handbook," under the "Modal Discussion" (possibly at the end of the discussion, as a new section between 6.13 and 6.14): <i>The association between respiratory and other non-cancer health effects, and proximity to high traffic roadways, is addressed in the California Air Resources Board's (CARB's) Air Quality and Land Use Handbook (Handbook). Diesel exhaust and other cancer-causing chemicals emitted from cars and trucks, known as mobile source air toxics (MSATs), are responsible for much of the overall cancer risk from airborne toxics in California. CARB community health risk assessments have resulted in information that should be considered when siting new "sensitive land uses," including residences, schools, day care centers, playgrounds, and medical facilities. Sensitive land uses deserve special attention because children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Properly addressing these siting situations is important preventative action. Any section of the RTP discussing highways, freight corridors, and other transportation facilities, should include the following:</i> <i>Mobile Source Air Toxics</i> <i>1. Discussion of the siting of new freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities, near sensitive land uses. The CARS Handbook contains siting recommendations.</i> <i>2. Discussion of MSA Health risk and exposure reduction at sensitive land uses, where sensitive land uses are sited near highways, freight corridors, and other transportation facilities associated with high MSA T exposure (within the minimum distances indicated in CARB's Handbook). Local air districts often have protocols for discussion of health risk, and best management practices for exposure reduction. The Federal Environmental Protection Agency has also released Recommendation for Constructing Roadside Vegetation on Barriers to improve Near-Road Air Quality.</i>	Comment will be considered for incorporation in Appendix L
Sacramento Metropolitan Air Quality Management District	6.26	183	In section 6.26, we recommend explicitly listing "Create active transportation plans" as a transportation strategy	Comment incorporated
Sacramento Metropolitan Air Quality Management District	Apx. I	276	Transportation Planning and Investment Strategies Add: 7. In setting priorities, consider transportation projects that provide public health co-benefits.	Comment incorporated
Sacramento Metropolitan Air Quality Management District	Apx. I	276	In Appendix I under "Transportation Planning and Investment Strategies," the District recommends including "Fix It First" policies, for example with the following text: <i>Employ "Fix It First" policies to ensure that preventive maintenance and report of existing roads are the highest priority for spreading, to reduce overall maintenance costs, and to support development in existing centers and corridors.</i>	Comment incorporated
San Diego Association of Governments (SANDAG)	3	46	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.	
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.	

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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)	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 http://www.CA Air Resources Board.ca.gov/cc/scoping plan/2013_update/first_update_climate_change_scoping_plan.pdf). The RTP Guidelines should be consistent with the CA Air Resources Board's Scoping Plan.	Comment incorporated
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.	Comment incorporated
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.	Comment incorporated
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.	Comment incorporated
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.	Comment incorporated
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."	Comment incorporated
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: http://www.CA Air Resources Board.ca.gov/research/seminars/zhu2/zhu2.htm	Comment Addressed
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.	Comment incorporated
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.	Comment incorporated
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.	Comment incorporated
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.	Comment incorporated
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.	Comment incorporated
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.	Comment incorporated
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.	Comment incorporated in Section 6.19; text also modified.
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.	Comment incorporated

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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."	Comment incorporated
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: http://www.CA Air Resources Board.ca.gov/cc/sb375/staff_report_sb375_targets_update.pdf The June 2016 Scoping Plan Update Concept Paper can be found here: http://www.CA Air Resources Board.ca.gov/cc/scopingplan/document/2030_sp_concept_paper2016.pdf	ARB revised language
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: http://www.sdforward.com/pdfs/RP_final/AppendixH-SocialEquityEngagementandAnalysis.pdf	Comment incorporated
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.	Comment incorporated
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: http://www.sandag.org/uploads/publicationid/publicationid_1910_18614.pdf	Comment incorporated
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".	Comment incorporated
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: http://www.sdforward.com/pdfs/RP_final/AppendixQ-WhitePapers.pdf	Comment incorporated
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.	Comment Acknowledged
Santa Barbara County Association of Governments	3.4	50	5. Simplify the discussion on modeling: Section 3.4 RTDM Quality Control and Consistency, does into significantly more depth than is needed for RTP Guidelines. Many aspects of the section are not relevant to developing RTPs. Others, such as the discussion on validating models, should be left to the referenced material. Section 3.4, up to Calculating VMT, could be replaced with a statement such as: <i>Models used for analysis performed in support of developing an RTP or SCS shall be validated and calibrated in accordance with the latest FHWA guidance. MPOs should consult with Air Resources Board staff early in the SCS development process and on a continuing basis.</i>	
Santa Barbara County Association of Governments	1.3	9	3. Clarify the date when the revised guidelines will become applicable: A paragraph was added to page 9 of the draft RTP Guidelines to state when the update RTP Guidelines will become applicable. As drafted, the paragraph is ambiguous and confusing and does not satisfy its intended purpose. We suggest revising the paragraph to state simply, for example, "All RTPs adopted after December 31, 2017 are subject to the updated RTP Guidelines."	Comment incorporated
Santa Barbara County Association of Governments	NA	NA	1. Explicitly state that MPOs that are also RTPAs need only follow the MPO version of the RTP Guidelines: SBCAG is unique in that it is one of a handful of California Metropolitan Planning Agency (RTPA). Once of the primary changes proposed with this revision of the RTP Guidelines is splitting the document into two separate documents, one each for MPOs and RTPAs. SBCAG previously sought clarification on how this change would impact our organization. According to CTC staff, MPOs also serving as RTPAs would need only follow the MPO version of the RTP Guidelines. SBCAG requests that applicability of the Guidelines be explicitly stated in both versions of the RTP Guidelines. This clarification is important because having to refer to and follow two, separate sets of Guidelines would be unduly burdensome for MPOs that are also RTPAs.	Comment incorporated
Santa Barbara County Association of Governments	NA	NA	2. Distinguish clearly between statutory requirements and best practices: The RTP Guidelines should clearly distinguish between contents required by statute/regulation and those that are merely recommendations or best practices. The RTP checklist in Appendix C should be re-organized into separate lists of legal requirements ("shalls") and recommendations/best practices. Legal requirements should include a reference to applicable statute or regulatory authority. SBCAG thinks that the word "should" in the text is too strong for optional or "best practices" items, because it implies an obligation or requirement. If something is not a legal requirement, it should be described as "recommended", "may include" or might consider including", rather than "should".	For workgroup discussion; Appendix C is limited to statutory requirements; Appendix M was added to compile all "best practices;" Section 1.0 was inserted to define the use of "shalls" and "shalls."
Santa Barbara County Association of Governments	NA	NA	4. Limit the inclusion of SB 743-related requirements: Incorporating elements of SB 743 has been noted as one the bigger changes in the draft RTP Guidelines. The SB 743 Guidelines are not final yet. Any SB 743-related requirements for MPOs in the RTP Guidelines should only be included where expressly required by the SB 743 statute and the statutory reference should be given, such as the identification of high-quality transit corridors (Gov. Code 65088.1(e)). While MPOs may be required to apply new SB 743 CEQA standards to projects for which they are the lead agency, SB 743 does not give MPOs broader responsibility for SB 743 implementation through the RTP development process.	Comment acknowledged
School Facilities and Transportation Services Division California Department of Education	4.7	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, biking, pedestrian/bike safe routes to schools, etc.). Approximately 10% of the state's public schools are charter 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."	Comment incorporated
School Facilities and Transportation Services Division California Department of Education	6.26	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 bussing 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)."	Comment incorporated
School Facilities and Transportation Services Division California Department of Education	Apx. E	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."	Comment incorporated

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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."</p> <p>http://www.CA Air Resources Board.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf</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>	
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>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>	Comment Acknowledged
Southern California Association of Governments	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>	Comment incorporated
Southern California Association of Governments	1.1	4	<p>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.</p>	Comment incorporated
Southern California Association of Governments	1.1	4	<p>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."</p>	Comment incorporated
Southern California Association of Governments	1.2	5	<p>The text currently reads: "In addition, SB 391 requires Caltrans to update the CTP by December 31, 2015, and every 5 years thereafter."</p> <p>Please revise text to read: "In addition, SB 391 required Caltrans to update the CTP by December 31, 2015, and every 5 years thereafter."</p>	Comment incorporated
Southern California Association of Governments	1.3	8	<p>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.</p>	Comment incorporated
Southern California Association of Governments	1.6	16	<p>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."</p>	Comment incorporated

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Southern California Association of Governments	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.	Comment incorporated in Apx. L
Southern California Association of Governments	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. https://www.opr.ca.gov/docs/DRAFT_General_Plan_Guidelines_for_public_comment_2015.pdf	Comment incorporated in Apx. L
Southern California Association of Governments	2.3	26	Definitions for Health in All Policies, Health Equity, and Social Determinants of Health should be included and discussed.	Comment incorporated in Apx. L
Southern California Association of Governments	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. http://scagrtpsc.net/Documents/2016/proposed/pf2016RTPSCS_PublicHealth032816.pdf	Comment incorporated in Apx. L
Southern California Association of Governments	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.	Comment incorporated in Apx. L
Southern California Association of Governments	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.	Comment incorporated
Southern California Association of Governments	2.6	32	In the second bulleted list, please consider adding "District System Management Plans (DSMPs)."	Comment incorporated
Southern California Association of Governments	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.	Comment incorporated
Southern California Association of Governments	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."	Comment incorporated
Southern California Association of Governments	5	115	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.	Comment incorporated
Southern California Association of Governments	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."	Comment incorporated
Southern California Association of Governments	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.	Comment Acknowledged; once CEQA Guidelines are final, the RTP Guidelines will be amended and will use this comment
Southern California Association of Governments	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."	Comment incorporated
Southern California Association of Governments	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."	Comment incorporated
Southern California Association of Governments	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."	Comment incorporated
Southern California Association of Governments	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.	Comment incorporated

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Southern California Association of Governments	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.	Comment incorporated
Southern California Association of Governments	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.	Comment incorporated
Southern California Association of Governments	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.	Comment incorporated
Southern California Association of Governments	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.	Comment incorporated
Southern California Association of Governments	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.	Comment incorporated in Chapter 7 - in process of adding more background on national performance measures.
Southern California Association of Governments	6.19	166	Please revise this section to reflect the requirements of the Safety Performance Management Measures Final Rule.	Comment incorporated in Section 6.20
Southern California Association of Governments	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."	Comment incorporated
Southern California Association of Governments	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.	Comment incorporated
Southern California Association of Governments	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	Comment incorporated
Southern California Association of Governments	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.	Comment acknowledged
Southern California Association of Governments	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.	Comment incorporated
Southern California Association of Governments	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.	Comment incorporated
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	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	1.1	3	Changed "nearly forty percent" to "approximately half"	This section was revised to reflect the ARB 2014 Scoping Plan
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)"	This section was revised to reflect the ARB 2014 Scoping Plan
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,..."	Comment incorporated
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"	Comments from multiple stakeholders requested that this language be removed for modified
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"	Comments from multiple stakeholders requested that this language be removed for modified

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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: http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf "	Comments from multiple stakeholders requested that this language be removed for modified
Strategic Growth Council/Governor's Office of Planning & Research	1.1	5	Add "Air Resources Board Brief: http://www.CA.Air.Resources.Board.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf Air Resources Board Technical Background Document: http://www.CA.Air.Resources.Board.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_bkgd.pdf "	Comments from multiple stakeholders requested that this language be removed for modified
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."	Comments from multiple stakeholders requested that this language be removed for modified
Strategic Growth Council/Governor's Office of Planning & Research	1.2	8	Add "sufficient"	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	1.2	8	Add "reductions"	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	1.2	8	Add "and SB 391"	Comment incorporated
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. "	Comments from multiple stakeholder requested the language to be removed and left in Chapter 5
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	Comment Acknowledged
Strategic Growth Council/Governor's Office of Planning & Research	1.6	14	This entire section should be updated to reflect FAST Act http://www.fhwa.dot.gov/fastact/factsheets/metropolitanplanningfs.cfm	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	1.6	14	Agree-language update needed	Comment Acknowledged
Strategic Growth Council/Governor's Office of Planning & Research	1.7	16	Change "Summarizes" to "Acknowledges"	Comment incorporated
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	Comment Acknowledged
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	Comment Acknowledged
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"	Comment Acknowledged; please provide specific language.
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	Comment incorporated
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	Comment Acknowledged
Strategic Growth Council/Governor's Office of Planning & Research	2.2	22	Change "37%" to "approximately half"	Revised to reflect the 2014 ARB Scoping Plan

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Strategic Growth Council/Governor's Office of Planning & Research	2.2	22	Add "[including tailpipe emissions, which themselves comprise 37% of state emissions]."	Revised to reflect the 2014 ARB Scoping Plan
Strategic Growth Council/Governor's Office of Planning & Research	2.2	23	Add "Governor Brown's executive orders: B-16-2012: https://www.gov.ca.gov/news.php?id=17472 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." B-30-15: https://www.gov.ca.gov/news.php?id=18938 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. 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. 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."	Comment incorporated
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.	Comment incorporated
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	Comment Acknowledged
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	Comment Acknowledged
Strategic Growth Council/Governor's Office of Planning & Research	2.3	24	We suggest providing a more comprehensive list here	Comment Acknowledged
Strategic Growth Council/Governor's Office of Planning & Research	2.3	25	Add "prioritize"	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	2.3	25	Add "investment"	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	2.3	25	Add "increase walk and bike mode shares and..."	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	2.3	25	OPR strongly recommends include recommendations for actions to implement this law	Comment Acknowledged
Strategic Growth Council/Governor's Office of Planning & Research	2.4	26	What about 49 USC 5303?	Comment incorporated
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.	Comment Acknowledged
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	Comment Acknowledged
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	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	2.7	29	Add "reflects"	Comment incorporated

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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	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	2.7	29	Add "the need for access to destination for people and goods"	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	2.7	31	Add "better transportation mode choices;"	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	2.7	31	Include guidance on how this might this best be accomplished	Comment Acknowledged
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.	Comment Acknowledged
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"	Comment incorporated
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."	Comment incorporated
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	Comment Acknowledged
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	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	2.9	39	FHWA and FTA jointly work on planning	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	2.9	40	We recommend updating this section	Comment Acknowledged
Strategic Growth Council/Governor's Office of Planning & Research	4.1	77	Enhance language on coordination with local general plans	Addressed in Section 2.6
Strategic Growth Council/Governor's Office of Planning & Research	4.1	78	Check 49 USC 5303 for transit consultation requirement as well	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	4.4	82	Word choice?	Comment Acknowledged
Strategic Growth Council/Governor's Office of Planning & Research	4.6	85	Update for FAST Act: "Consultation with other planning officials 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))"	Comment incorporated
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?	Correct, not related to RTPs

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Strategic Growth Council/Governor's Office of Planning & Research	5.1	96	<p>Changes in FAST Act can be found here: http://www.fhwa.dot.gov/fastact/factsheets/metropolitanplanningfs.cfm</p> <p>And include: Scope of planning process The FAST Act expands the scope of consideration of the metropolitan planning process to include—</p> <ul style="list-style-type: none"> • improving transportation system resiliency and reliability; • reducing (or mitigating) the stormwater impacts of surface transportation; and • enhancing travel and tourism. [23 U.S.C. 134(h)(1)(I) & (I)] <p>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)]</p>	Comment incorporated
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. "	Comment incorporated
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	Comment Acknowledged
Strategic Growth Council/Governor's Office of Planning & Research	5.3	98	Update for FAST act: http://www.fhwa.dot.gov/fastact/factsheets/metropolitanplanningfs.cfm	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	5.7	107	Update	Comment Acknowledged
Strategic Growth Council/Governor's Office of Planning & Research	6.1	113	stress consistency with local general plans and zoning as well	Comment addressed in Section 2.6
Strategic Growth Council/Governor's Office of Planning & Research	6.7	122	Change "condition and performance" to "maintenance"	Comment incorporated
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"	Comment incorporated
Strategic Growth Council/Governor's Office of Planning & Research	6.23	145	Delete "shall"	Comment incorporated
The Nature Conservancy	2.2	24	<p>Ensure Consistency with State Law and Policy</p> <p>The CTP and RTP Guidelines should go beyond simply requiring compliance with the law by actively incorporating California's planning priorities and climate, health and equity goals. Along with many other participants in the CTC's workshop kicking off the Guidelines Update process, we believe that transportation has a tremendous impact on the ability to achieve these goals.</p> <p>Currently, however, some RTPs include legacy projects that conflict with the state's climate, conservation, health, equity and affordable housing policies. To avoid this disconnect in the future, we respectfully recommend that the CTP and RTP Guidelines stress the importance of aligning transportation projects and plans with state policy goals.</p> <p>Executive Order B-30-15</p> <p>An excellent place to start is Executive Order B-30-15 (EO 30-15),16 which we are pleased to see is explicitly referenced in the Draft CTP and RTP Guidelines. The Governor's Office of Planning and Research, in consultation with Caltrans and other state agencies, is developing guidance on implementation of this Executive Order, including direction on prioritizing natural infrastructure in addressing climate impacts. We respectfully recommend that this guidance be incorporated into the final version of the RTP Guidelines or amended into them when complete. In addition, we respectfully recommend expanding the "key language" from EO 30-15 in Section 2.2 of the Draft RTP Guidelines to include the seventh and eighth sections of the Executive Order:</p> <p>7. State agencies' planning and investment shall be guided by the following principles:</p> <ul style="list-style-type: none"> • Priority should be given to actions that both build climate preparedness and reduce greenhouse gas emissions; • Where possible, flexible and adaptive approaches should be taken to prepare for uncertain climate impacts; • Actions should protect the state's most vulnerable populations; and • Natural infrastructure solutions should be prioritized. 	Comment incorporated

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The Nature Conservancy	2.7	30	<p>Incorporate Conservation into Transportation Planning and Project Development Early and Robustly</p> <p>Examples of where this strategy can be incorporated include the following:</p> <ul style="list-style-type: none"> ● RTP Guidelines Section 2.7: Include in the Transportation Concept Reports integration and alignment with the SWAP, habitat conservation plans and regional greenprints (where applicable). ● RTP Guidelines Section 2.7: Highlight opportunities to develop programmatic mitigation plans as described in Section 1311 of MAP-21 and refined in the FAST Act. ● RTP Guidelines Section 2.8: Add a box in the flowchart to say, "Interagency coordination begins with state and federal agencies (CDFW, USFWS, Army Corps of Engineers, USEPA, NOAA) on natural resource issues. Consider developing programmatic mitigation plans, habitat conservation plans or Regional Advance Mitigation Plans." ● RTP Guidelines Section 4.10 (page 112): Add the California Ocean Protection Council to the list. ● RTP Guidelines Section 4.10 (bottom of p. 111): Add "The FHWA's Eco-Logical and Integrated Ecological Framework and the state's Regional Advance Mitigation Planning model provides a process by which early consultation with resource agencies and conservation non-profit organizations to develop regional greenprints or conservation plans that identify of areas of conservation value can satisfy federal requirements for early consultation and result in benefits for both transportation agencies and environmental protection. Programmatic mitigation plans, Natural Communities Conservation Plans and Habitat Conservation Plans can provide early consultation and identification of natural resources that need to be avoided or minimized in order to reduce risk and streamline project delivery," and add as a best practice SCAG's recently approved SCS Appendix on Natural and Farm Lands. 	Comment incorporated
The Nature Conservancy	3.3	48	<p>Ensure that Modeling Takes Conservation and Climate Concerns into Account</p> <p>To facilitate the inclusion of conservation and land use data into transportation models to identify potential impacts on conservation values, we recommend including the following guidance in Section 3.3 of the RTP Guidelines (starting on page 49):</p> <p><i>Consider using models to analyze and evaluate the effects of various land use-related transportation scenarios on changes in biological carbon, such as the Climate Action through Conservation model. Include areas identified in the California Protected Areas Database, 29 wetlands and water resource areas, habitat connectivity, habitat conservation plans and regional greenprint layers, where available.</i></p> <p><i>Consider using integrated scenario reporting models to measure and report on impacts of different scenarios to key metrics, such as the Urban Footprint model.</i></p>	
The Nature Conservancy	3.5	61	<p>Ensure that Modeling Takes Conservation and Climate Concerns into Account</p> <p>The benefits of land use and transportation patterns that avoid and reduce GHG emissions from the biological carbon pool—and the value of models that accurately quantify these benefits— could also be noted in Sections 3.5 (under "Regional Economic & Land Use Model") and 6.1 (in element 8 of the SCS components listed on page 134).</p>	
The Nature Conservancy	5.5	122	<p>Ensure that Modeling Takes Conservation and Climate Concerns into Account</p> <p>Similarly, after the first paragraph under "Climate Change/GHG Emissions" in Section 5.5, we recommend the following additional language:</p> <p>Agencies that take actions to control GHG emissions by reducing VMT will likely generate additional GHG reductions in the biological carbon pool. By modeling various scenarios, they will be able to estimate and take full credit for these additional GHG benefits.</p>	Comment incorporated
The Nature Conservancy	5.5	124	<p>Encourage Comprehensive Regional Mitigation</p> <p>Mitigating the impacts of transportation projects on natural and working lands is both a legal requirement and a significant expenditure of taxpayer funds. To help MPOs maximize the predictability, connectivity and long-term effectiveness of mitigation investments, we recommend the following changes to Section 5.5 of the RTP Guidelines, starting with the final paragraph on page 124 (additions in italics):</p> <p>Voluntarily <i>and thoroughly</i> addressing all of the applicable topics noted above during the preparation of the RTP would be considered as a best practice. As a best practice to comply with the requirements of CA Government Code Section 65080(b)(2)(b) as well as Title 23 CFR Parts 450.3224(f)(710), 450.3224(g)(1) and (2), MPOs may <i>are strongly encouraged to 1)</i> develop a Regional Open Space and Conservation Area Framework that identifies and considers "resource areas" and "farmland" defined in Government Code Section 65080.01(a) and (b), <i>as well as other key resources identified in HCPs, NCCPs and input from leading conservation organizations, 2) consider developing an NCCP to aid in streamlining project permitting and delivery, 3) use the Regional Open Space and Conservation Area Framework to set priorities for a regional advance mitigation planning (RAMPP) program or a programmatic mitigation plan as described in MAP-21, and 4) require, as a condition of transportation funding and consistency with the SCS, that projects provide mitigation according to these priorities, including any advance acquisitions and restoration work necessary to avoid temporal gaps in habitat function. Any conservation easements acquired as part of this program should be held by an organization whose mission includes the acquisition and stewardship of conservation easements, such as a Land Trust Alliance-accredited land trust.</i></p> <p><i>An excellent example of this approach is San Diego's Environmental Mitigation Program (EMP), which is funded through the region's TransNet sales tax measure. The EMP directs mitigation resources to habitat identified in adopted conservation plans, leverages funding from conservation partners, and saves additional money by acquiring habitat "early, at lower prices, and in larger parcels" (http://www.keepsandiegomoving.com/EMP/EMP-intro.aspx). For more information, please see San Diego Forward: The Regional Plan (http://www.sdforward.com/).</i></p>	Comment incorporated
The Nature Conservancy	5.5	122	<p>Encourage Climate Adaptation</p> <p>We are pleased to see the attention given to climate change in the Draft RTP Guidelines. In addition to incorporating EO-30-15 and other state climate policies as discussed above, we respectfully recommend that the RTP Guidelines incorporate specific guidance on climate adaptation and suggest models that can predict future conditions, especially sea level rise and increased flooding. Built infrastructure should be planned, designed and constructed to be resilient to climate change impacts for the full use life of the project and to at least 2050 for especially durable projects. Further guidance on scenarios and timeframes will be provided by OPR and should be amended into the RTP Guidelines (and if possible, individual RTPs) at that time. In addition, "full-life cycle accounting" should include an economic estimate of all of the benefits of a project, including those typically considered "non-market." Strategic retreat, or relocating facilities out of harm's way if threatened by future inundation due to sea level rise, should be one alternative that is considered where its use is possible. As a step in this direction, we respectfully recommend that the third sentence in the second paragraph under "Context Sensitive Solutions" in Section 2.7 be changed as follows (new text in italics):</p> <p>When considering the context, issues such as funding feasibility, maintenance feasibility, needs of all users, needs of the community, traffic demand, impact on alternate routes, impact on safety, <i>predicted climate change impacts</i> and relevant laws and regulations should be addressed.</p> <p>Similarly, at the end of the second paragraph under Wetlands in Section 5.5, please add <i>"Strategic retreat or relocation shall be one alternative to be considered."</i></p>	Comment incorporated

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The Nature Conservancy	5.5	122	<p>Expand Key Environmental Considerations for Best Practices Finally, after the subsection on "Threatened and Endangered Species" in Section 5.5., we respectfully recommend insertion of the following language on habitat connectivity:</p> <p><i>Section 1797.5 of the California Fish and Game Code expresses the State's policy to promote the voluntary protection of wildlife corridors and habitat strongholds in order to enhance the resiliency of wildlife and their habitats to climate change, protect biodiversity, and allow for the migration and movement of species by providing connectivity between habitat lands. In order to further these goals, it is the policy of the State to encourage voluntary steps to protect the functioning of wildlife corridors through various means, such as the acquisition or protection of wildlife corridors as open space through conservation easements; the installation of wildlife-friendly or directional fencing; siting of mitigation and conservation banks in areas that provide habitat connectivity for affected fish and wildlife resources; and the provision of roadway undercrossings, overpasses, oversized culverts, or bridges to allow for fish passage and the movement of wildlife between habitat areas. Transportation facilities should be designed, engineered, planned, and programmed with habitat connectivity in mind in keeping with these State goals in order to maintain healthy ecological function and climate change resiliency in and between habitat areas.</i></p>	Comment incorporated
The Nature Conservancy	6.1	133	<p>Ensure that Modeling Takes Conservation and Climate Concerns into Account The benefits of land use and transportation patterns that avoid and reduce GHG emissions from the biological carbon pool—and the value of models that accurately quantify these benefits— could also be noted in Sections 3.5 (under "Regional Economic & Land Use Model") and 6.1 (in element 8 of the SCS components listed on page 134).</p>	Comment incorporated
The Nature Conservancy	6.24	179	<p>Incorporate a Regional Open Space and Conservation Area Framework We recommend the following changes to Section 6.24 of the RTP Guidelines, starting on page 179 (additions in italics):30</p> <p>As a best practice to comply with the requirements of CA Government Code 65080 (b)(2)(B), MPOs, based on locally and regionally significant considerations, may are strongly encouraged to develop a regional conservation framework. <i>Regional Open Space and Conservation Area Framework</i> that identifies and considers "resource areas" and "farmland" as defined in Government Code Section 65080.01(a) and (b). To demonstrate consideration of resource areas and farmland, the SCS could 1) identify regional priority areas for conservation and mitigation efforts, based upon existing publicly available information and developed in consultation with the appropriate resource agencies including cities and counties, 2) adopt a land use forecast structured around spatially explicit, complementary networks of priority conservation areas and priority development areas, and 3) commit discretionary funding for conservation and development incentives for such areas. For an example of this approach, see Plan Bay Area (http://planbayarea.org/the-plan/adopted-plan-bay-area-2013.html).</p> <p><i>Another way to demonstrate consideration of resource areas and farmland is to 1) incorporate layers representing all categories of "resource areas" listed in Government Code Section 65080.01(a) and (b), as well as other key resources identified in HCPs, NCCPs and input from leading conservation organizations, and 2) treat these layers as constraints to development in land use scenarios and the adopted land use forecast. This low-cost, straightforward approach was pioneered by the Santa Barbara County Association of Governments (using a "Regional Greenprint" of GIS layers representing habitat, agricultural resources and other open space areas), and the Tulare County Association of Governments (using layers from the San Joaquin Valley Greenprint). For more information, see Santa Barbara's 2040 Regional Transportation Plan and Sustainable Communities Strategy (http://www.sbcag.org/rtp.html) and the 2014-2040 Regional Transportation Plan & Sustainable Communities Strategy for Tulare County (http://www.tularecog.org/rtp2014/).</i></p>	Comment incorporated
The Nature Conservancy	6.24	179	<p>We further recommend that Section 6.24 include examples of best practices for visualization and mapping. For example, Urban Footprint can reveal outcomes ranging from household costs, water and energy use, to loss or retention of open space. In the same section, after the third paragraph under "SCS Planning Assumptions," we recommend the following additional language:</p> <p><i>MPOs should incorporate protected areas identified in the California Protected Areas Database (http://www.calands.org) and any other natural resource areas and farmland information gathered in order to avoid impacting or fragmenting areas of high conservation value and to reduce risk to project delivery.</i></p> <p><i>In addition, MPOs should make use of models that predict climate impacts like sea level rise, and that estimate changes in carbon stocks from alternative project or land management activities. Recent research shows that changes in land use and management can generate GHG benefits by avoiding and reducing emissions, and by increasing carbon storage. MPOs are encouraged to refer to the Climate Action through Conservation (CATC) report at http://scienceforconservation.org/downloads/climate_action_through_conservation. The model, method and tool presented in this report is usable at the county or regional scale, and can help MPOs to provide a more comprehensive account of their progress toward meeting the state's GHG reduction goals.</i></p>	Comment incorporated
The Nature Conservancy	6.24	179	<p>Incorporate a Regional Open Space and Conservation Area Framework We recommend the following changes to Section 6.24 of the RTP Guidelines, starting on page 179 (additions in italics):</p> <p><i>To support and expand upon these practices, MPOs are strongly encouraged to help local jurisdictions integrate HCPs, NCCPs and other conservation plans into their general plans, and incorporate the results into future land use forecasts. Prior to preparing its 2012 MTP/SCS, for example, the Butte County Association of Governments (BCAG) helped four of six local jurisdictions update their general plans to be consistent with one another, and with the Butte Regional Conservation Plan (BRCP) then in development. Based in part on these plans, its 2012 land use forecast directs most new growth into a network of Urban Permit Areas designed to minimize conflict with the BRCP. Thus, by working on a voluntary basis with those who have land use planning authority, BCAG was able to lay the groundwork for a land use pattern that will help protect some of its region's most important habitat and open space. For more information, see Butte County Metropolitan Transportation Plan & Sustainable Communities Strategy. (http://www.bcag.org/Planning/RTP-SCS/Index.html).</i></p> <p>The following represent additional best practice examples of how MPOs have conducted regional conservation planning efforts focusing on resource areas and farmland:</p> <p>North County Multiple Habitat Conservation Program (MHCP) coordinated by SANDAG: http://www.sandag.org/index.asp?projectid=97&fuseaction=projects.detail</p> <p>Rural-Urban Connections Strategy (RUCS) developed by SACOG: http://www.sacog.org/rucsc/</p> <p><i>Natural and Farm Lands Appendix prepared by SCAG for its 2016 RTP/SCS: scartrpscs.net/Documents/2016/final/2016RTPSCS_NaturalFarmLands.pdf</i></p> <p><i>Regional Greenprint Analysis prepared by AMBAG for its 2014 MTP/SCS: http://www.ambag.org/programs-services/planning/metro-transport-plan</i></p> <p><i>San Joaquin Valley Greenprint, sponsored by Fresno COG: www.fresnocog.org/san-joaquin-valley-greenprint-program</i></p>	Comment incorporated

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The Nature Conservancy	Apx. A	191	<p>Appendix A</p> <p>Sample Language, Implementation Steps and Performance Measures for Selected Best Practices (adapted from Livingston, 2016)</p> <ul style="list-style-type: none"> Identify priority areas for conservation and development and use discretionary funding to support conservation or development in these areas. <p>o Sample language: "Conservation and compact growth play complementary roles in reducing per capita GHG emissions, strengthening our region's economy and providing a host of additional benefits. To maximize these benefits, the land use forecast and funding allocations in this RTP/SCS [or MTP/SCS] are designed to support the protection of habitat, agricultural land and open space in Priority Conservation Areas (PCAs) and to direct growth and transportation investments to Priority Development Areas (PDAs). During the term of this RTP/SCS, \$ million in new funding will be provided for the conservation of PCAs, and \$ million in new funding will be devoted to incentives for growth in PDAs."</p> <p>o Implementation steps: Adopt a land use forecast structured around a spatially explicit framework of PCAs and PDAs, with funding for protection of PCAs and incentives to direct new development to PDAs. This framework should be designed with 1) an emphasis on habitat connectivity and maintaining the integrity of human communities (i.e., not dividing established communities or displacing their residents), 2) attention to the needs of both rural areas and urban centers, and 3) a focus on conserving areas that will still be viable in light of expected impacts of climate change, water availability and other factors.</p> <p>o Suggested performance measures: 1) Presence of spatially explicit framework of PCAs and PDAs in RTP/SCS; 2) levels of funding for protection of PCAs and growth incentives in PDAs; 3) factors used to select PCAs; 4) percentage of PCA land permanently protected during term of RTP/SCS; and 5) percentage of PCA land converted to development or otherwise degraded during term of RTP/SCS (ideally zero).</p>	Comment incorporated into Appendix M
The Nature Conservancy	Apx. A	191	<p>Appendix A</p> <p>Sample Language, Implementation Steps and Performance Measures for Selected Best Practices (adapted from Livingston, 2016)</p> <ul style="list-style-type: none"> Integrate resource data layers into land use scenario modeling and use those layers to direct investment into existing communities to meet fiscal, transportation, health, equity and conservation goals. <p>o Sample language: "Conservation of natural and working lands supports development patterns that reduce GHG emissions, while providing co-benefits ranging from food security and a robust agricultural economy to wildlife habitat, clean and affordable water and access to the outdoors. In addition, conservation of natural and working lands can avoid GHG emissions of carbon from plants and soil from land use change and eliminate the future carbon sequestration benefits that these natural systems would provide. To realize these and other benefits, the land use forecast in this RTP/SCS treats all categories of 'resource areas' listed in Cal. Gov. Code § 65080.01(a), as well as all prime farmland, farmland of statewide importance and unique farmland, as constraints to development."</p> <p>o Implementation steps: Comprehensively map resource areas and farmland, including but not limited to 1) all categories of "resource areas" listed in Cal. Gov. Code § 65080.01(a), 2) all areas needed to maintain connectivity within and between the region's habitats and habitat types, and 3) all prime farmland, farmland of statewide importance and unique farmland in the MPO region according to the most recent data available from the California Department of Conservation's Farmland Mapping and Monitoring Program. Include maps of all categories of resource areas and farmland in the RTP/SCS, and treat these areas as constraints to development when designing a land use pattern, such that the final adopted land use pattern excludes resource areas and farmland from development.</p> <p>o Suggested performance measure: Absence of new development on resource areas and farmland during term of RTP/SCS.</p> <ul style="list-style-type: none"> Provide comprehensive regional mitigation based on conservation priorities, including areas identified in HCPs and NCCPs. <p>o Sample language: "Mitigating the impacts of transportation projects on natural and working lands is both a legal requirement and a significant expenditure of taxpayer funds. In order to maximize the predictability, connectivity and long-term effectiveness of mitigation investments, it is the policy of [MPO] to require science-based, comprehensive regional mitigation for all transportation projects. To make this possible, [MPO] has developed [or is incorporating] a comprehensive Greenprint offering a spatially explicit set of conservation priorities for a regional advance mitigation planning (RAMP) program. As a condition of transportation funding and consistency with this RTP/SCS, all transportation projects are required to provide mitigation in accordance with these priorities, including any advance acquisitions and restoration work necessary to avoid temporal gaps in habitat function. This mitigation will also meet the following standards:</p> <ul style="list-style-type: none"> Mitigation ratios of at least one-to-one for farmland and higher ratios as necessary for other natural resources; Adherence to the mitigation hierarchy (avoidance first, minimization second and offsets third) in all cases; and Mitigation for each project that addresses the specific conservation values impacted by that project within the framework of RAMP priorities. 	Comment incorporated into Appendix M
The Nature Conservancy	Apx. A	191	<p>Appendix A</p> <p>Sample Language, Implementation Steps and Performance Measures for Selected Best Practices (adapted from Livingston, 2016)</p> <ul style="list-style-type: none"> Provide comprehensive regional mitigation based on conservation priorities, including areas identified in HCPs and NCCPs. <p>Any conservation easements acquired as part of this program will be held by organizations whose mission includes the acquisition and stewardship of conservation easements."</p> <p>o Implementation steps: Develop a "Greenprint" resource analysis, including at a minimum 1) all categories of "resource areas" listed in Cal. Gov. Code § 65080.01(a), 2) all prime farmland, farmland of statewide importance, unique farmland and grazing land in the MPO region according to the most recent data available from the California Department of Conservation's Farmland Mapping and Monitoring Program, 3) habitat identified in any applicable Habitat Conservation Plans (HCPs) or Natural Community Conservation Plans (NCCPs), 4) resource areas in any local or regional "Greenprint" (such as the San Joaquin Valley Greenprint), and 5) input from leading conservation organizations. Use this analysis to set priorities for RAMP and require, as a condition of transportation funding and consistency with the SCS, that projects provide mitigation accordingly.</p> <p>o Suggested performance measures: 1) Presence of comprehensive regional mitigation policy (including Greenprinting and RAMP) in RTP/SCS; 2) extent to which Greenprint and resulting RAMP priorities address all categories of resource areas and agricultural land noted above, while incorporating existing resource analyses and input from conservation organizations; 3) connectivity of areas selected as RAMP priorities; 4) compliance with RAMP program and other mitigation standards (e.g., ratios, mitigation hierarchy and relevance to conservation values impacted by specific project) for all projects approved during term of RTP/SCS; and 5) maintenance of habitat function, agricultural productivity and other conservation values impacted by transportation projects during and after term of RTP/SCS.</p>	Comment incorporated into Appendix M
The Nature Conservancy	NA	NA	<p>Incorporate Conservation into Transportation Planning and Project Development Early and Robustly</p> <p>Protecting natural and working lands is a state planning priority, as well as a strategy to achieve other climate and health policy goals. In transportation planning and project development, incorporating conservation early and robustly can yield more effective project delivery, better project outcomes, reduced risk, shortened environmental review, and protection of critical natural resources. We therefore recommend that the CTP and RTP Guidelines reflect the work that transportation interests and research institutions have done on this subject.</p> <p>Examples of relevant reports include the Federal Highway Administration's Eco-Logical: An Ecosystem Approach to Implementing Infrastructure Projects, and the Transportation Research Board's Practitioner's Guide to the Integrated Ecological Framework, which helps agencies at the state, regional and local levels achieve their project delivery goals and conservation goals. Our recommendation is also consistent with provisions in SAFETEA-LU,12 MAP-2113 and the FAST Act14 requiring early consultation with environmental agencies and stakeholders.</p>	Comment incorporated in Section 5.2

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The Nature Conservancy	NA	NA	<p>Ensure Consistency with State Law and Policy 8. The state's Five-Year Infrastructure Plan will take current and future climate change impacts into account in all infrastructure projects.</p> <p>Similarly, the "General" subsection of the RTP Checklist in Appendix C (starting on page 201 of the Draft RTP Guidelines) should include the following question: "How does the RTP and its projects align with the specific principles and direction in Executive Order B-30-15?"</p> <p>The RTP Guidelines should also note that natural infrastructure, which ranges from wetland, floodplain and riparian restoration¹⁷ to urban forestry, bioswales and stormwater capture, can help solve transportation infrastructure problems efficiently—and often more cost effectively than new built infrastructure—while minimizing greenhouse gas (GHG) emissions, providing a suite of companion public benefits and enhancing quality of life and property values. Along with urban greening and complete streets, these approaches can bring the cost-effectiveness, efficiency, and multiple-benefit outcomes of natural infrastructure to urban areas where the environmental impacts of transportation investments are most strongly felt.</p>	Unable to incorporate as RTP checklist question without statutory citation
The Nature Conservancy	NA	NA	<p>Ensure Consistency with State Law and Policy <i>Safeguarding California Plan</i></p> <p>We also recommend that the CTP and RTP Guidelines be harmonized with the Safeguarding California Plan and its companion Safeguarding California Implementation Action Plans. As the most recent articulation of state policy on climate adaptation and resilience addressing the transportation sector, Safeguarding California should be integrated into Section 2.6 of the RTP Guidelines. In addition, the "Consultation/Cooperation" section of the RTP Checklist in Appendix C (starting on page 202 of the RTP Guidelines) should include the following question: <i>"Does the RTP reflect consultation with the Natural Resources Agency on conformity with the relevant provisions in the Safeguarding California plan and its companion Implementation Action Plans?"</i></p>	Comment incorporated in Section 2.3; Unable to incorporate as RTP checklist question without statutory citation
The Nature Conservancy	NA	NA	<p>Ensure Consistency with State Law and Policy AB 498</p> <p>We further recommend consistency with the state's policy on wildlife corridors as expressed in AB 498 (Levine). This statute articulates a statewide policy of protecting wildlife corridors and habitat strongholds in order to enhance their resilience to climate change, and of encouraging voluntary steps to protect the functioning of wildlife corridors.</p> <p>By referencing AB 498, the CTP and RTP Guidelines could help knit together local conservation efforts and transportation planning to support habitat connectivity, an ecological function that is particularly damaged by transportation facilities. This revision could also help to create an awareness of habitat connectivity among transportation planners who understand that climate change is a significant threat to biodiversity in California, but are less aware of opportunities to work toward connectivity enhancements that will build resilience in natural systems.</p> <p>Consistent with AB 498, we recommend that the CTP Guidelines provide guidance on protecting habitat connectivity and wildlife movement to increase safety, reduce animal-vehicle collisions and ensure healthy wildlife populations. Similarly, Chapters 2, 5 and 6 of the RTP Guidelines should emphasize the following approaches:</p> <ul style="list-style-type: none"> • Explicitly map habitat connectivity corridors (referencing the Essential Habitat Connectivity Project²¹ and/or regional habitat connectivity plans and projects where applicable, such as those used by SC Wildlands); • Invest in culverts, overpasses, fencing and other transportation project elements to enhance connectivity for wildlife movement and climate adaptation; and • Ensure consistency with habitat conservation plans, regional greenprints, and other regional conservation plans. 	Comment incorporated in Section 5.5
The Nature Conservancy	NA	NA	<p>Other Policies and Plans</p> <p>Other state policies and plans that should be referenced in the CTP and RTP Guidelines include the Draft Environmental Goals and Policy Report (EGPR) and the State Wildlife Action Plan (SWAP). The Draft EGPR identifies five elements of the state's strategy for a sustainable future, including stewarding natural and working landscapes and incorporating climate adaptation into plans and investments. The SWAP, updated in 2015, identifies the state's ecoregions and conservation goals and strategies. It also includes companion plans for the transportation and land use sectors, as well as strategies such as Regional Advance Mitigation Planning and Natural Community Conservation Plans that can be incorporated into individual regions' RTPs. To ensure that MPOs can benefit from this guidance, we respectfully recommend that the Draft EGPR and SWAP be integrated into Section 2.6 of the RTP Guidelines.</p>	Comment incorporated in Section 2.6
The Nature Conservancy	NA	NA	<p>Include Performance Metrics that Measure Impacts to Natural and Working Lands</p> <p>We recommend that the Draft CTP and RTP Guidelines include performance metrics that measure impacts to natural and working lands so that transportation projects can avoid and minimize these impacts. Transportation systems and facilities are among the biggest threats to the health of ecosystems that sustain life for nature and people. Caltrans and regional transportation agencies should establish performance metrics, such as habitat loss, degradation, and fragmentation; riparian corridors, seeps, and springs impacted; groundwater recharge areas impacted; and wildlife corridors protected or enhanced. These metrics can be used to track progress toward state and national goals.</p> <p>For the CTP Guidelines, we suggest a recently published Transportation Research Board report that identifies environmental performance measures for state-level transportation planning. For the RTP Guidelines, the TNC-commissioned report attached as Appendix B covers a range of conservation-related metrics that MPOs included in their SCs. We respectfully recommend that the RTP Guidelines reference the report, and incorporate the following performance measures into Section 6.18: (GRAPH CAN BE SEEN IN LETTER LINK)</p> <p>We further recommend that performance measures in Section 6.18 be consistent with national goals set forth in the FAST Act and state infrastructure planning priorities specified in AB 857 (Wiggins).</p>	Comment incorporated in Chapter 7

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The Nature Conservancy	NA	NA	<p>Incorporate a Regional Open Space and Conservation Area Framework <i>To realize the benefits of natural resource assessments like these, it is essential that they be thoroughly incorporated into land use scenarios and transportation project selection. In addition to the approaches taken by the Bay Area, Santa Barbara County, Tulare County and Butte County, MPOs are encouraged to follow an approach set forth in SLOCOG's first RTP/SCS: "Give conservation plans as much weight as general plans when planning transportation investments." For more information, see http://www.slocog.org/programs/regional-planning/2014-rtpscs.</i></p> <p>The following represent possible sources of information to can assist MPOs in gathering and considering the best practically available scientific information regarding resource areas and farmland:</p> <p>Survey of conservation best practices in SCSs, with sample language, implementation steps and suggested performance measures for specific practices:</p> <p>Sustainable Communities Strategies and Conservation: Results from the First Round and Policy Recommendations for the Future Round, by Adam Livingston http://www.southernsierrapartnership.org/scs-policy-report.html</p> <p>Natural Community Conservation and Habitat Conservation Planning Information:</p> <p>CA Department of Fish and Game Natural Community Conservation Planning information http://www.dfg.ca.gov/habcon/nccp/</p>	Comment incorporated
Transportation Solutions Defense and Education Fund	1.1	4	Change "required an update in CEQA transportation metric towards alignment with climate and planning goals." to "required an update in CEQA transportation metrics to align with climate and planning goals."	Comment incorporated
Transportation Solutions Defense and Education Fund	1.1	4	Add comma: "As a result of state legislation and executive orders, GHG emission reduction has become one of the key priorities in the statewide and regional transportation planning process, in addition to improving transportation mobility, addressing federal air quality criteria pollutants and ensuring that the statewide regional transportation system addresses tribal, local, regional, and statewide mobility and economic needs."	Comment incorporated
Transportation Solutions Defense and Education Fund	1.1	4	Change "Numerous studies show that investments in roadway capacity increase tend to cause increases in VMT and GHGs," to "Numerous studies show that investments in roadway capacity increase tend to cause increases in VMT and GHGs."	This section was removed at the request of various stakeholders
Transportation Solutions Defense and Education Fund	1.3	9	Establish context: "The 2016 RTP Guidelines update was prepared..."	Comment incorporated
Transportation Solutions Defense and Education Fund	2.3	27	Please break up the very long paragraph, starting new paragraphs at "As some health advocates have said..." and at "The design of the transportation system..."	Comment incorporated
Transportation Solutions Defense and Education Fund	3.1	47	Delete RTPA references.	
Transportation Solutions Defense and Education Fund	3.1	47	Change "...in large part depend on ..." to "...in large part dependent on ..."	
Transportation Solutions Defense and Education Fund	3.2	47	Change "The impacts are reported as performance measures..." to "The impacts are evaluated according to performance measures..."	
Transportation Solutions Defense and Education Fund	3.3	48	<p><u>Structural Suggestions</u> Instead of listing all the RTP requirements in one dense clump, how about extracting a phrase from each, and compiling a bulleted list with references to Guidelines page numbers? Turn it essentially into a checklist or Table of Requirements. e.g., 20-year planning horizon x page Most recent planning assumptions y page</p>	
Transportation Solutions Defense and Education Fund	3.3	48	Delete the second "used": "Regional transportation plan analysis is also used as a policy tool used to test..."	
Transportation Solutions Defense and Education Fund	3.4	59	<p><u>Structural Suggestions</u> There is a great deal of repetition in the update to Chapter 3. For example, the Interagency Consultation paragraph is a duplicate of the first bullet on p. 53. The last bullet on p. 61 is nearly identical with the 6th bullet on p. 62. With so many requirements to study, the process of taking them all in is harmed by running across them multiple times. Repetitions should be deleted. Select an unusual word in each paragraph and search for it to find repetitions.</p>	
Transportation Solutions Defense and Education Fund	3.4	50	Change this: "Regional Travel Demand Modeling consistency and quality control is tool used to determine a regions air quality conformity status and to effectively implementing SCSs. The conformity 40 CFR 93.105 requires that an interagency consultation process involving MPOs, State and local air quality planning agencies, State and local transportation agencies, EPA, and the USDOT for the following:" to this: "Regional Travel Demand Modeling consistency and quality control is a tool used to determine a region's air quality conformity status and to effectively implementing SCSs. The conformity rule 40 CFR 93.105 requires that an interagency consultation process involving MPOs, State and local air quality planning agencies, State and local transportation agencies, EPA, and the USDOT for the following:"	
Transportation Solutions Defense and Education Fund	3.4	51	Change this: "Model input assumptions are necessary part of running a transportation demand modeling and determining if the MPO will meet air quality conformity or its GHG emissions reductions targets. Assumptions must be derived from the estimates of current and future population, employment, travel, and congestion most recently developed by the MPO or other agency authorized to make such estimates and approved by the MPO." to this: "Model input assumptions are a necessary part of running a transportation demand modeling and determining if the MPO will meet air quality conformity or its GHG emissions reductions targets. Assumptions must be derived from the estimates of current and future population, employment, travel, and congestion most recently developed by the MPO or other agency authorized to make such estimates and approved by the MPO."	
Transportation Solutions Defense and Education Fund	3.4	51	Change this: "The results of the review of the planning assumptions and consultation process would evaluating and choosing assumptions that are documented in the conformity determination." to this: "The results of the review of the planning assumptions and consultation process would evaluating evaluate and choose choosing assumptions that are documented in the conformity determination."	
Transportation Solutions Defense and Education Fund	3.4	51	Shift this to the RTPA Guidelines: "The interagency consultation process is also the forum for used in conformity determinations in isolated rural nonattainment and maintenance areas (40 CFR 93.105(c)(1)(vi))."	

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Transportation Solutions Defense and Education Fund	3.4	51	Don't the bullet points belong under a Recommendations section, as a "should"? Also, these bullet points repeat what was stated in bullet points on the previous page. Maybe the p. 50 bullet points should be deleted as redundant.	
Transportation Solutions Defense and Education Fund	3.4	51	Note the apparent footnote 6 in the third lower bullet.	
Transportation Solutions Defense and Education Fund	3.4	52	Delete the space in "post- processing..."	
Transportation Solutions Defense and Education Fund	3.4	53	Change "date" to "data" in the second bullet.	
Transportation Solutions Defense and Education Fund	3.4	53	Insert "to" before "use" in the seventh bullet.	
Transportation Solutions Defense and Education Fund	3.4	53	Use the plural of "source" in the next-to-last bullet.	
Transportation Solutions Defense and Education Fund	3.4	50-53	Please review these pages for repetitions and delete redundant material.	
Transportation Solutions Defense and Education Fund	3.4	54	Insert a comma and a "the" before the first use of "MPO" in the first bullet. Insert a "the" before the other use of "MPO" in the first bullet.	
Transportation Solutions Defense and Education Fund	3.4	54	Change this: "...regional transportation agencies are encouraged consider ways to incorporated them..." to this "...regional transportation agencies are encouraged to consider ways to incorporated incorporate them..."	
Transportation Solutions Defense and Education Fund	3.4	55	Delete the first use of "For additional guidance see,"	
Transportation Solutions Defense and Education Fund	3.4	56	Insert "their" before "roadway network". Note that this paragraph is repeated on p. 61.	
Transportation Solutions Defense and Education Fund	3.4	56	Change the second bullet from this: "MPOs shall have minimum three trip purposes..." to this "MPOs shall have a minimum of three trip purposes..." Insert spaces before (HBS) and (HBU).	
Transportation Solutions Defense and Education Fund	3.4	57	Delete the space in "count- based."	
Transportation Solutions Defense and Education Fund	3.4	59	Insert "the" before the first use of SCS.	
Transportation Solutions Defense and Education Fund	3.4	60	Insert "to" before "review" in "expert peer advisory teams review"	
Transportation Solutions Defense and Education Fund	3.4	60	Change this: "...supported by the scientist literature and relevant case studies, where feasible and supported by data, the list should include elasticities associated with BMP." to this: "...supported by the scientist scientific literature and relevant case studies, where feasible and supported by data, the list should include elasticities associated with BMPs."	
Transportation Solutions Defense and Education Fund	3.4	60	We are unable to translate this into English: "Minimally, ARB is encouraged work with the land use and transportation technical experts to identify a range or general scale of the possible GHG benefits of the policies and practices identified in the BMP list."	
Transportation Solutions Defense and Education Fund	3.4	61	Pluralize "consist" on the first line.	
Transportation Solutions Defense and Education Fund	3.5	61	Structural Suggestions The heading RTP Modeling Improvement Program does not apply to the requirements for modeling groups listed in this section. We suggest you create a separate section with that heading, and move the appropriate material into in. The requirements can return to being titled "RTP Modeling."	
Transportation Solutions Defense and Education Fund	3.5	61	Structural Suggestions The concept of cumulative requirements seems to have gotten lost in the update process. For example, the last two bullets on p. 62 are repeated as the twelfth bullet on p. 63 and the tenth bullet on p. 64	
Transportation Solutions Defense and Education Fund	3.5	61-65	Formatting Suggestions The headings for the different MPO groupings are essentially invisible, even though they are bold. The bullet points are not readily distinguishable from the substantive bullet points. They need to have a higher hierarchy level as headings. I suggesting making each one a bold lettered heading.	
Transportation Solutions Defense and Education Fund	3.5	61	Change the comma to an apostrophe in "SB 375, SCS analysis."	
Transportation Solutions Defense and Education Fund	3.5	61	Insert "a" before "different" in the last bullet	

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Transportation Solutions Defense and Education Fund	3.5	63	Change this: "Vehicle ownership model shall be developed and used. Vehicle ownership model is critical to determine..." to this: " <u>A</u> vehicle ownership model shall be developed and used. <u>A</u> vehicle ownership model is critical to determine in determining ..."	
Transportation Solutions Defense and Education Fund	3.6	68-71	Structural Suggestions These pages have the same problem as was found on p. 48 (described above). The text is impenetrable. No one will learn from this section, as it is indigestible. In addition, it merely repeats the contents of the rest of the Guidelines. It is unclear what purpose it is intended to serve. To the extent that it is useful to divide up the requirements between the different MPO groups, then the suggestion above for p. 48 applies here, too.	
Transportation Solutions Defense and Education Fund	3.6	68	Change this: "Transportation planning agency designed under..." to this: "Transportation planning agency designed <u>agencies designated</u> under..."	
Transportation Solutions Defense and Education Fund	3.6	68	Change this: "...are required prepare and adopted a RTP that consider factors ..." to this: "...are required to prepare and adopted <u>adopt an</u> RTP that considers factors..."	
Transportation Solutions Defense and Education Fund	3.6	68	Change this: "...agencies other thank those..." to this: "...agencies other than those..."	
Transportation Solutions Defense and Education Fund	3.6	68	Delete the extra "o" between "development of."	
Transportation Solutions Defense and Education Fund	3.6	68	Verify that there are still triennial RTPs.	
Transportation Solutions Defense and Education Fund	3.6	68	Change this: "... as part the public..." to this: "... as part of the public..."	
Transportation Solutions Defense and Education Fund	3.6	69	Change this: "... base their updates the latest..." to this: "... base their updates <u>on</u> the latest..."	
Transportation Solutions Defense and Education Fund	3.6	69	Insert an apostrophe in the last two uses of "plans" in the first paragraph	
Transportation Solutions Defense and Education Fund	5.4	121	Please break up the very long paragraph, starting new paragraphs at "Eco-logical..." and "In addition, ..."	Comment incorporated
Transportation Solutions Defense and Education Fund	6.1	136	Because Section 6.16 has been deleted due to obsolescence, the last sentence in the first paragraph should be deleted.	Section 6.16 was restored
Transportation Solutions Defense and Education Fund	6.7	143	Please fix this sentence: "MAP-21/FAST establish limitations on federal funding flexibility if the aggregate bridge condition in California does not meet certain minimum conditions for National Highway System (NHS) bridges. MPOs shall monitor the current structurally deficient bridge deck area and make the necessary investment decisions that result in less than 10% of the agencies' NHS bridge deck area." At a minimum, insert at the end: "being structurally deficient."	Comment incorporated
Transportation Solutions Defense and Education Fund	6.8	145	Change "7. Consider CTP policy suggesting to invest strategically to optimize performance; and 8. Consider CTP policy suggesting for the application of sustainable preventative maintenance and rehabilitation strategies." to: "7. Consider CTP policy suggesting <u>strategic investing</u> to optimize performance; and 8. Consider CTP policy suggesting for the application of sustainable preventative maintenance and rehabilitation strategies."	Comment incorporated
Transportation Solutions Defense and Education Fund	6.11	148	Put a hyphen in "freight-related strategies."	Comment incorporated
Transportation Solutions Defense and Education Fund	6.11	149	The section on the FAST Act contains no recommendations. It should be given its own heading.	Comment Acknowledge
Transportation Solutions Defense and Education Fund	6.11	149	"Centerlines" should not be plural	Comment incorporated
Transportation Solutions Defense and Education Fund	6.12	150	"May 2016" should not be all caps	Comment incorporated
Transportation Solutions Defense and Education Fund	6.12	151	Change "who's" to "whose."	Comment incorporated
Transportation Solutions Defense and Education Fund	6.12	151	Delete the period: "Federal laws (Title 23 CFR Part 450.324(g) and. Title 23 CFR Part 450.316(a) (1))"	Comment incorporated
Transportation Solutions Defense and Education Fund	6.12	152	Move the "Military Airfields and Installations" heading to the next page.	Comment incorporated
Transportation Solutions Defense and Education Fund	6.12	153	Change "and sea leave rise." to "and sea level rise."	Comment incorporated

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Transportation Solutions Defense and Education Fund	6.12	153	The recommendation for RTPAs is probably intended to be for MPOs.	Comment incorporated
Transportation Solutions Defense and Education Fund	6.12	154	Are the underlinings in the bullet points intentional? They appear random.	Comment incorporated
Transportation Solutions Defense and Education Fund	6.13	157	Transit includes rail. It is redundant to write "transit and rail."	Comment Acknowledged
Transportation Solutions Defense and Education Fund	6.18	165	The Guidelines are intended to be comprehensive, containing all the relevant requirements. Because the Guidelines reference Attachment 1, the document would be more helpful if Attachment 1 was made into an appendix.	Comment Acknowledged; a link to the document is provided
Transportation Solutions Defense and Education Fund	6.21	169	Note the underlined phrase: "The RTP should include by corridor all strategies, actions and improvements identified in the adopted TCR or CSMP that are needed to <u>restore capacity</u> and describe how the corridor will be managed across jurisdictions and modes to <u>improve corridor performance</u> based upon performance measurement." This is an artifact from the previous versions' focus on congestion, and needs to be modified similar to the changes on p. 36.	Comment incorporated
Transportation Solutions Defense and Education Fund	6.28	187	This paragraph has run-on sentences: "The Safeguarding California Plan builds on the foundation of the CAS by identifying progress made on reducing emissions and addressing vulnerabilities, a review of new studies and policies, and specific actions needed to prepare for climate risks to the transportation sector. Some of these actions include research into new technology, climate science, and geophysics that could impact the transportation system, policies to improve planning and design for climate change adaptation, and an improved platform for sharing information." Better would be: "The Safeguarding California Plan builds on the foundation of the CAS by identifying progress made on reducing emissions and addressing vulnerabilities. It includes a review of new studies and policies, and specific actions needed to prepare for climate risks to the transportation sector. Some of these actions include Research is needed into new technology, climate science, and geophysics that could impact the transportation system. Also needed are policies to improve planning and design for climate change adaptation, and an improved platform for sharing information."	Comment incorporated
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>	
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>	
University of California, Davis	3	46	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;	
University of California, Davis	3	46	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;	
University of California, Davis	3	46	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);	
University of California, Davis	3	46	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;	
University of California, Davis	3	46	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;	
University of California, Davis	3	46	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;	
University of California, Davis	3	46	All costs should be part of consideration (e.g., health and environmental) -- not just vehicle operating costs;	

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University of California, Davis	3	46	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. PSRC's approach has now been peer reviewed. 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.	
University of California, Davis	3	46	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 to 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 recommendations 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.	
University of California, Davis	3.2	57	This sentence makes no sense; it says 'tools' are used as 'tools'. Please clarify. Transportation planners and engineers utilize various transportation analysis tools (models) as both policy and technical tools during the regional transportation planning process. 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." 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.	
University of California, Davis	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 associate with interregional travel trips.	
University of California, Davis	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.	
University of California, Davis	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.	
University of California, Davis	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.	
University of California, Davis	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.	
University of California, Davis	3.4	65	MPOs should provide the results of backcasting efforts in data form and these should be made publicly available.	

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University of California, Davis	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));	
University of California, Davis	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.	
University of California, Davis	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.	
University of California, Davis	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	
US Environmental Protection Agency, Region IX	2.6	30	Health Considerations 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. Please consider including the following: 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.	Title revised to align with AB 441; incorporated remaining suggestions
US Environmental Protection Agency, Region IX	5.7	126	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.	Comment incorporated in Section 5.5
US Environmental Protection Agency, Region IX	NA	NA	FAST Act Provisions/Federal Requirements 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. 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.	Comment incorporated in Section 6.1
US Environmental Protection Agency, Region IX	NA	NA	Analysis of Climate Change Impacts The Council on Environmental Quality (CEQ) has released final guidance (<<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.	Comment incorporated in Section 5.2
US Environmental Protection Agency, Region IX	NA	NA	Environmental Justice and Title VI of the Civil Rights Act 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	Comment incorporated in Section 4.2
US Environmental Protection Agency, Region IX	NA	NA	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 & Operation	Comment incorporated into Appendix M
US Environmental Protection Agency, Region IX	NA	NA	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. http://www3.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm http://www.CA Air Resources Board.ca.gov/msprog/onroad/optionnox/optionnox.htm	Unable to incorporate as the definitions are not specific to the RTP Process