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October 13, 2016

Ms. Susan Bransen
Executive Director
California Transportation Commission
1120 N Street
Sacramento, CA 95814

Re: CSAC Comments on September 2016 Draft Regional Transportation Planning Guidelines

Dear Ms. Bransen:

The California State Association of Counties (CSAC) submits the following comments for your consideration as the California Transportation Commission (CTC) updates the Regional Transportation Plan Guidelines (RTP Guidelines). We sincerely appreciate the opportunity to provide feedback, as well as the very open, transparent and robust public process the CTC has undertaken for this update. CSAC also recognizes the challenge the CTC faces in terms of consolidating and reconciling the feedback it receives with respect to the guidance and direction contained within the RTP Guidelines.

The development of Regional Transportation Plans (RTPs) and related planning processes undertaken by Regional Transportation Planning Agencies (RTPAs) and Metropolitan Planning Organizations (MPOs) are already highly complex. This level of complexity is necessary in order to develop a unique regional vision and goals for transportation investments and the mobility of goods and people. This is especially true given competing policy mandates, differing priorities across a region, and the ongoing statewide transportation funding crisis. State, regional and local transportation programs are all experiencing multi-billion dollar shortfalls in funding to preserve and maintain our existing transportation infrastructure, let alone improve it and transform it to better provide transportation options that facilitate compact development, reduce vehicle miles travelled, promote active modes of transportation and reduce greenhouse gas emissions (GHGs).

Despite a clear lack of resources to remake our transportation system, RTPAs and MPOs must develop these plans to meet specific transportation goals related to efficiency, safety, congestion, and maintenance. In addition, they must also meet state GHG reduction targets. Moreover, RTPs are updated every four or five years so it's a continual planning process. RTPs

are fiscally constrained documents and provide a land use forecast for the region based on anticipated growth set forth within local general plans.

But increasingly, MPOs and RTPAs are also being asked to address other goals and co-benefits—such as access to affordable housing, a jobs-housing balance, supporting economic growth, overall quality of life, public health, and social equity—that are in addition to their specific statutory mandate. While CSAC supports all of the complementary goals and co-benefits recommended in the Draft RTP Guidelines, CSAC is concerned that RTPs continue to become too cumbersome and overly-burdened with additional aspirational goals that are not required by state or federal law.

We recognize that RTPs are very important planning documents, but these documents and the agencies developing them face limitations. By way of example the Draft RTP Guidelines add to the list of other plans RTPAs/MPOs should consult and try to be consistent with another 14 state and local plans. This is in addition to the 15 plans already provided for in the current RTP Guidelines, for a total of 31 plans. Given the multitude of issues RTPs must consider and plan for, as well as the importance of the regional plans in terms of a region's overall economy and future growth, CSAC believes it is critical that the RTP Guidelines recognize and maintain a clear difference between what is required by federal and state law and regulations, and other aspirational goals and best practices.

The number of instances where current language is changed from "should" to "shall" within the draft document, particularly in Chapter 7: Performance Measures, is concerning. The use of "shall" should be strictly limited to instances where state or federal laws or regulations explicitly require a specific RTPA/MPO action. Furthermore, the addition of a number of provisions outlining what an RTP "should" do, as well as the inclusion of directives for state agencies within the RTP Guidelines are of concern to CSAC. For instance, Chapter 2: Regional Transportation Plan Process adds the following to the background information on State Climate Change Legislation and Executive Orders: SB 32 (Chapter No. 249, Statutes of 2016), AB 1482 (Chapter No. 249, Statutes of 2016), AB 246 (Chapter No. 606, Statutes of 2016), SB 350 (Chapter No. 547, Statutes of 2016), and SB 379 (Chapter No. 608, Statutes of 2016), in addition to the new Executive Orders adopted since the last RTP Guidelines update. While these may be important information for RTPAs/MPOs to have in terms of background and the overall policy landscape in which RTPs are developed, many of the recent bills signed into law direct state action and do not specifically mandate action by RTPAs/MPOs in the context of RTPs.

CSAC adamantly believes that if the State wants to mandate or encourage RTPAs/MPOs to meet aspirational goals in addition to the existing federal and state requirements for RTPs, there must be a commensurate investment of resources. Funding must be allocated to the specific projects and plans that will allow RTPs to implement the long-term vision they set forth within the documents. This includes, at minimum, a transportation funding and reform package that invests in maintaining and preserving the existing state and local surface transportation systems, key freight corridors, transit, active transportation infrastructure, and regional projects that will help the state meet its GHG reduction goals. Furthermore, access to affordable housing and fixing the jobs-housing imbalance – another cornerstone of RTPs under SB 375 – requires the State to adopt a permanent source of funding for the development of affordable housing.

California's counties remain committed to doing our part at the local level to raise revenues for transportation, make cost-effective investments in the local street and road system, upgrade these facilities to better accommodate transit, bicycle and pedestrian activities, and use alternative technologies that reduce costs and impacts on the environment and climate. CSAC is also actively working to explore way in which counties can expedite the housing planning and permitting process to reduce the cost of housing development in our communities. These local initiatives are intimately tied with the regional goals included in RTPs, but neither local nor regional efforts will be successful without a strong state partnership. Accordingly, CSAC urges the CTC to take an approach to the RTP guidelines that is focused primarily on the mandates of existing state and federal law, and which recognizes that the achievement of additional, aspirational policy goals will be contingent on the allocation of resources in partnership with regional and local agencies.

Again, thank you for the opportunity to provide our perspectives on the Draft RTP Guidelines. If you need any further information regarding our position or would like to discuss our feedback in greater detail, please do not hesitate to contact me (916.650.8185 or kvalentine@counties.org).

Sincerely,

Kiana Valentine
Legislative Representative
California State Association of Counties