

## Draft 2016 Regional Transportation Plan Guidelines Comment Form

Thank you for reviewing the Draft 2016 Regional Transportation Plan Guidelines document. Listed below are directions for submitting your input, ideas and comments specific to the Draft 2016 Regional Transportation Plan Guidelines document. The public comment period for this document begins Wednesday, September 21, 2016 and ends Friday, October 14, 2016, 5:00 PM PST.

Directions for submitting comments:

1. Fill out your contact information (type preferred)
2. Fill out your comments individually, providing as much detail as possible (type preferred). Please reference chapter and page numbers.
3. Submit your comments via:
  - a. E-mail: [RTP.Guidelines.Update@dot.ca.gov](mailto:RTP.Guidelines.Update@dot.ca.gov)
  - b. U.S. Mail:  
Priscilla Martinez-Velez  
Division of Transportation Planning, MS-32  
California Department of Transportation  
P.O. Box 942874  
Sacramento, CA 94274-0001
  - c. Fax: (916) 653-0001  
Attn: Priscilla Martinez-Velez
  - d. In person: 1120 N Street, Sacramento, CA  
Attn: Priscilla Martinez-Velez - Division of Transportation Planning MS-32

### Contact Information

We ask for your information so that we can contact you for clarification, if needed.

First Name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Title: \_\_\_\_\_

Organization: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Email address: \_\_\_\_\_

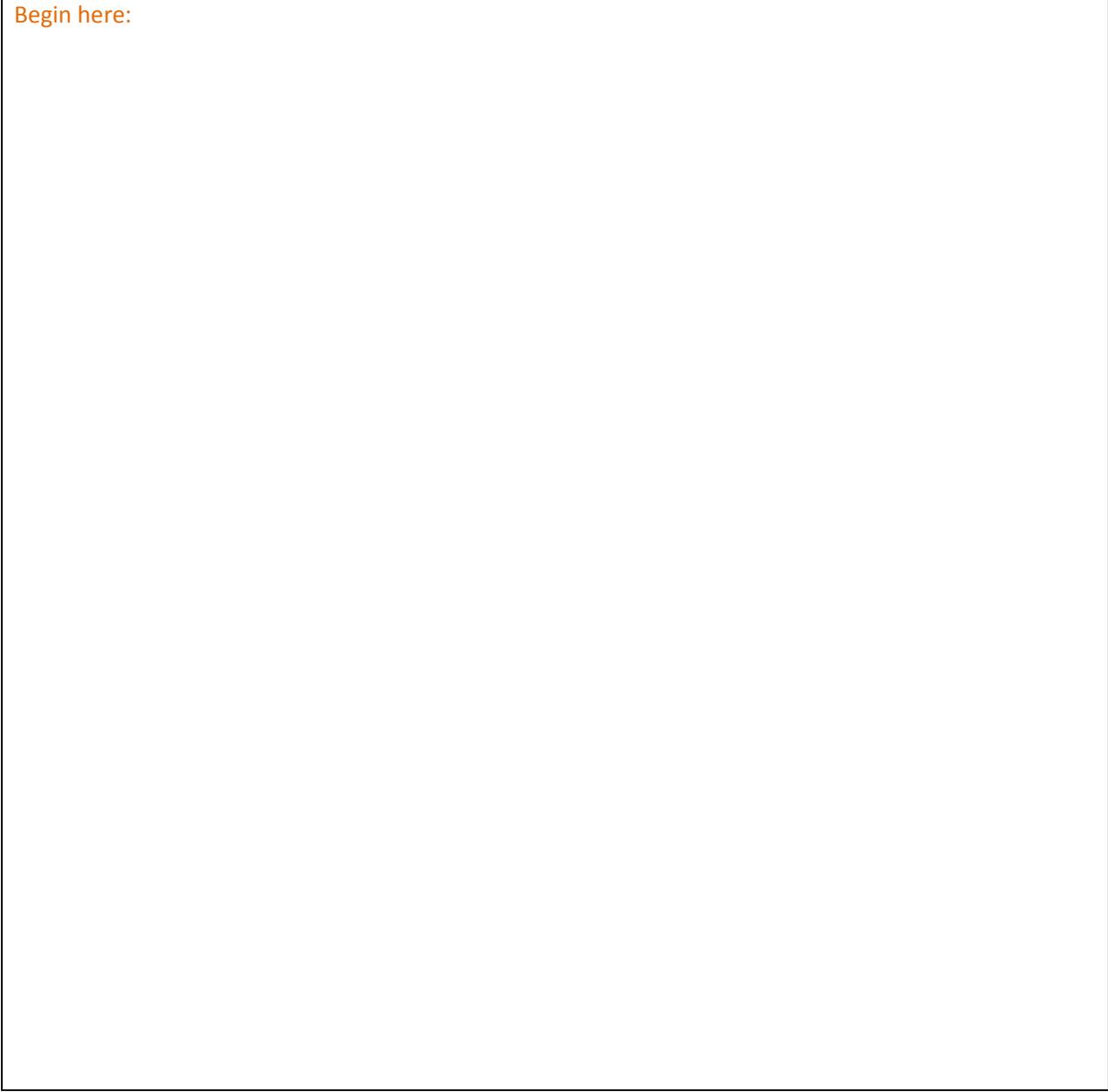
**Draft 2016 Regional Transportation Plan Guidelines  
Comment Form**

**Comment**

Please provide as much detail to your comment as possible (attach multiple pages if necessary).

Chapter: \_\_\_\_\_ Page: \_\_\_\_\_

**Begin here:**





October 14, 2016

Priscilla Martinez-Velez  
Division of Transportation Planning, MS-32  
California Department of Transportation  
P.O. Box 942874  
Sacramento, CA 94274-0001

RE: Comments on the RTP Guidelines Second Draft

Dear Ms. Martinez-Velez and CTC Staff:

Thank you once again for providing us the opportunity to engage in the process to update the California Transportation Commission's (CTC) Guidelines for Regional Transportation Plans (RTPs).

Our organizations represent a broad constituency that supports inclusive, transparent, and accountable regional planning. Our experience has consistently demonstrated that good regional planning is crucial to protecting our environment, strengthening our economy, and improving the health and well-being of all the residents of our regions, including the most disadvantaged residents and neighborhoods. We have previously submitted written comments on the [process itself](#)<sup>1</sup> (see

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<sup>1</sup> [http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index\\_files/6StakeholderGroupCommentLetter\\_June29.pdf](http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/6StakeholderGroupCommentLetter_June29.pdf)

June 29 letter), a list of [guiding principles](#)<sup>2</sup> (see July 17 letter) and comments on the [first draft](#)<sup>3</sup> (see August 5 letter). Several of our organizations have also submitted separate comment letters addressing specific issues.<sup>4</sup>

We write again to comment on the second draft, but especially to thank you for making many of the changes we suggested in our previous comment letters. We are pleased to see that additional language has been added to elevate social equity, civil rights, environmental justice, workforce and jobs, active transportation, public health, conservation and rural issues, among other issues, and we strongly support the inclusion of this language in the final draft. We have also appreciated being able to participate in the workgroups conducted thus far and plan to continue our engagement over the rest of this process.

Below we outline a few areas where we are pleased with the changes made between the first and second draft, followed by a few recommendations for strengthening this draft. Several of our organizations will also be providing separate comments on specific issues, including Appendix L on Public Health and Appendix M on Examples of Planning Practices. Some of these comments will come at a later date but in advance of the workgroups scheduled for November 3.

**First, we strongly support the following changes:**

- 1. Including stronger Title VI, civil rights, social equity factors, public engagement strategies, and environmental justice language in Chapter 4, the RTP Checklist and other parts of the document:** Our previous comment letters have urged the CTC staff to revise the RTP Guidelines with stronger language on these important issues. Public Advocates submitted a [chapter](#)<sup>5</sup> on civil rights and environmental justice. While a new chapter has not been included, as requested, we are pleased to see that a significant portion of that language has been incorporated into Chapter 4, Sections 4.1 to 4.4, including language on public engagement strategies. We are also supportive of the changes made to the RTP Checklist to add several new questions on these issues. Overall, we strongly recommend retaining the language that has been added, and adding in some omitted language, noted below in the recommendations section, in the final version of the RTP Guidelines to elevate equity and environmental justice in the planning of transportation investments and the SCS.

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<sup>2</sup> [http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index\\_files/7StakeholderGroupGuidingPrinciples\\_July17.pdf](http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/7StakeholderGroupGuidingPrinciples_July17.pdf)

<sup>3</sup> [http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index\\_files/6StakeholderGroupCommentLetter\\_Aug5.pdf](http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/6StakeholderGroupCommentLetter_Aug5.pdf)

<sup>4</sup> These letters include ones from Public Advocates

([http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index\\_files/3PublicAdvocates\\_July25.pdf](http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/3PublicAdvocates_July25.pdf) and [http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index\\_files/3PublicAdvocates\\_Aug5.pdf](http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/3PublicAdvocates_Aug5.pdf)); ClimatePlan ([http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index\\_files/25ClimatePlanCommentLetter\\_Aug5.pdf](http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/25ClimatePlanCommentLetter_Aug5.pdf)); CPEHN ([http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index\\_files/26CPEHNCommentLetter\\_Aug5.pdf](http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/26CPEHNCommentLetter_Aug5.pdf));

the California Cleaner Freight Coalition

([http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index\\_files/19CACleanerFreightCoalition\\_Aug5.pdf](http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/19CACleanerFreightCoalition_Aug5.pdf));

American Cancer Society

([http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index\\_files/13AmericanCancerSociety\\_Aug4.pdf](http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/13AmericanCancerSociety_Aug4.pdf)); and

Nature Conservancy/Sequoia Riverlands Trust

([http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index\\_files/12TNC\\_Aug3.pdf](http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/12TNC_Aug3.pdf))

<sup>5</sup> [http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index\\_files/3PublicAdvocates\\_July25.pdf](http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/3PublicAdvocates_July25.pdf)

**2. Adding language on workforce development and job training:**

In addition, we are pleased to see the inclusion of language that encourages regions to leverage transportation investments to increase access to workforce development and transportation jobs for low-income residents facing barriers to employment in Section 4.3 (p. 98). We understand that there was discussion at the October 7 meeting to remove this language and re-insert this in a local assistance guidance document. While we support inserting this language in an additional document(s), we believe it remains important for the RTP Guidelines to encourage regions to consider and prioritize projects with workforce and hiring strategies, including utilizing this criteria as a performance metric.

**3. Creating a new chapter dedicated to performance measures (Chapter 7):** Performance measures are tremendously important for tracking our progress toward a variety of goals, including the following:

- federal and state policy goals related to transportation, including those laid out by MAP-21 and the FAST Act;
- environmental and equity goals in SB 375, AB 32, SB 32, and AB 197; and
- state transportation plans that call for increasing the mode share of walking, biking and transit and advancing equity.

The Bay Area's MTC has led the way in moving toward a performance-based approach to selecting transportation projects, and our groups would like to see more MPOs go this route in selecting transportation projects. As mentioned at the workgroup meeting on Thursday, October 6, we support reorganizing this section to clearly identify which performance measures are statutorily required by MAP-21 and the FAST Act, and then also identifying recommended performance measures and examples of planning practices like the approach MTC is using.

**4. Revising the Public Health language, especially in Section 2.3 and Appendix L:** We thank the CTC staff for incorporating many of our comments on the public health language in the new draft. Specifically, Section 2.3 now contains language about "health equity" in addition to public health, as well as examples of how transportation planning can impact public health, and examples of how MPOs can incorporate public health into the RTP. There is also new public health language in Section 1.1, p. 6 and in Section 4.1 (p. 93) about consultation and coordination with public health departments. ***We support including the paragraph on page 31 that was discussed at the October 7 workgroup meeting, and agree to the changes recommended by the workgroup.*** Thank you for the opportunity to provide substantial new language to Appendix L. In the coming weeks, some of our groups will offer additional detailed comments to further refine and expand this Appendix as necessary. We look forward to discussing the Appendix in its entirety during the scheduled November 3 workgroup meeting.

**5. Adding language on active transportation, complete streets, and first/last mile issues:**

The sections dealing with pedestrian and bicycle issues, including 2.7 and 6.11, are significantly improved, including new language on complete streets, Safe Routes to School, and first and last mile issues. Section 6.9 on "Local Streets & Roads" also contains a new sentence saying the RTP should consider benefits of active transportation in planning road projects (top of p. 149), and Section 6.27 (p. 191) adds several types of active transportation plans to the section on "Land Use and Transportation Strategies to Address Regional GHG Emissions." We support these changes and hope they are retained in the final version of the

Guidelines.

- 6. Creating a new Appendix (M) on Planning Practice Examples:** A significant change in this draft is that all the Best Practices have been moved to this new Appendix on “Examples and Practices that Exceed Statutory Authority.” While we have some concerns with this reorganization, we hope that it will allow for a more robust list of planning practices than the original Guidelines document would allow. ClimatePlan, for instance has provided detailed comments in a report that they will be releasing soon, and we strongly recommend utilizing that document as you write this section. We are also including a list of planning practices from our August 5 comment letter as an Appendix to this letter to suggest including in the final document. Some of our groups will also attend the workgroup meeting on November 3 devoted to this topic.
- 7. Adding language on Conservation:** We appreciate you incorporating the comments made on behalf of our partners The Nature Conservancy and Sequoia Riverlands Trust on these sections, mostly in Chapters 5 and 6, and support their retention in the final draft.
- 8. Updating the list of legislation in Section 2.2 that affects regional transportation planning.** This past legislative session was a busy one for bills that affect regional transportation planning, including SB 32 and AB 197, which extend our climate targets to 2030. We are glad to see that these bills will be added in the second draft of the Guidelines. While we understand the concerns raised at the October 7 workgroup meeting about some of this legislation not directly impacting RTP preparation, it is still helpful to reference pieces of legislation that affect state and local planning, in order to promote coordination and consistency between different levels of planning and achieve our state climate and active transportation goals. We recommend keeping these bills in here and possibly reorganizing to categorize bills by their impact on state, regional and local planning. For local plans, we strongly support retaining references to SB 379 and adding SB 1000, which just recently passed and was signed by the Governor on September 26. SB 1000 addresses environmental justice issues in general plans, and should be referenced as another piece of legislation that must be factored into the RTP decision-making process. We also suggest adding SB 535 and AB 1550, which deal with the identification of disadvantaged communities in the Greenhouse Gas Reduction Fund and targeting meaningful benefits to these communities. MPOs should be aware of these requirements and can be proactive identifying these communities in their RTPs and prioritizing transportation investments within and that directly benefit them, in order to make them more competitive for GGRF funding.
- 9. Adding several types of plans to the “Consistency” section (2.6), including pedestrian and bicycle plans, public health plans, countywide LRTPs and habitat conservation plans:** Consistency between local, regional, and state plans is a major issue, and this language can promote greater coordination by listing more types of plans that affect regional transportation planning.
- 10. Restoration of Sec 6.16 on Consistency:** This is a critical section and we are supportive of adding it back in, and recommend retaining the language provided by Public Advocates in a previous comment letter.

- 11. Adding language on the sequencing of projects:** Section 6.2 now includes a sentence about the timing of projects in RTPs (p. 140): “MPOs are encouraged to provide the timing or year of construction for major investments, as practicable.” We have previously commented that this is a major issue in many of our regions, and while we would have liked to see stronger language about this issue, we are pleased to see a reference to it here.
- 12. Considering rural communities in the SCS:** We are pleased to see that our recommendation to add language about planning for rural areas has been incorporated into Section 6.26 on p. 187.
- 13. Adding language about climate adaptation:** We are also supportive of the new language in Section 6.30 (pp. 193-98) dealing with Adaptation of Regional Transportation Systems to Climate Change, given the threat that climate change poses to our regions and past and future transportation investments.

**However, we are concerned about the following revisions and recommend the following changes:**

- 1. Omission of several of our recommendations for equity and affordable housing language.** While we are overall pleased with the added emphasis and content on social equity and environmental justice, much of the requested content -- which mirrors relevant federal and state legal requirements -- has not been included. Specifically, we noted two major discrepancies from the agreements that Public Advocates reached on their call with CTC staff that were reflected in the annotated version of the chapter that staff was kind enough to provide on Aug. 19. First, the section on “affirmatively furthering fair housing” (sec. 3.3) was to be referred to Chapter 6 in the SCS section on addressing housing needs. And second, the section on “A fair and timely share of the benefits” (sec. 3.5) was to be referenced in Ch. 6.27 Land Use and Transportation Strategies to Address Regional GHG Emissions. We strongly request that this language be incorporated. The language in sec. 3.3 is crucial to ensure that the land-use actions in the SCS are consistent with federal fair housing laws, on which HUD funding for local governments and the State of California depend. And the language in sec. 3.5 provides an important foundation for how the State has defined investment equity in the overlapping and analogous area of climate investments from the GGRF. We understand that the most recent workgroup meetings including a suggestion to add language defining equity, and would be happy to work with you to craft such a definition based on the ARB funding guidelines discussed in sec. 3.5.
- 2. Little mention of housing issues:** Many of our regions are facing significant housing pressures, or at risk of future housing pressures as populations move around the state in search of more affordable housing. We have previously submitted comments on the lack of mention of affordable housing, gentrification and displacement in the RTP Guidelines, and are disappointed that this draft does not address these topics except in the SCS section on “Addressing Housing Needs in the SCS.” As mentioned in a previous comment letter, SB 375 calls for more concentrated development patterns that reduce sprawl in favor of compact, walkable communities. However, without careful integration of robust social equity

strategies, concentrating investment for infill in low-income areas, which are often communities of color, can exacerbate issues of housing affordability and displacement. Transportation and land-use planning must explicitly account for, and to the greatest extent possible, seek to avoid or mitigate displacement and housing unaffordability. This is especially of interest in light of research that shows that when existing residents are displaced due to unaffordable housing near transit, increased rates of auto-usage among new higher-income residents can lead to increases in GHG emissions. 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.

- 3. Removing last sentence of first paragraph on page 3 that references how RTPs should support state goals:** We recommend against removing the last sentence of the first paragraph as suggested at the October 7 workgroup meeting. It is important to reference state goals and how they align with the RTP process.
- 4. Removal of language about induced demand:** We noticed that in Section 1.1, page 6, that the paragraph about induced demand (starting with "Numerous studies show...") has been struck. We recognize that there is disagreement amongst stakeholders about induced demand, but feel strongly that this paragraph should be added back in. For our regions and state to meet our climate goals, we need to be reducing vehicle miles traveled and promoting alternative forms of transportation, not trying to justify more investments in road projects by discounting studies about how adding lanes can actually increase congestion.
- 5. Removal of many references to SB 743:** We recognize that SB 743 is still in the rulemaking process, but are concerned that many of the references to it have been removed. SB 743 is a fundamental tool in the implementation of SB 375 because it transitions the state away from consideration of the automobile-throughput focus of "Level of Service" to vehicle miles traveled (VMT), in environmental review of transportation projects. VMT 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. 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 reasonably expected fuel and vehicle efficiency

improvements, in order for the state to reach the GHG reduction target established in Executive Order B-30-15. Each MPO should develop a strong 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.

- 6. Modeling:** The modeling chapter has been significantly revised but is still very much in development, so it is hard to tell what kind of changes have been made. Some of us have had conversations with staff about this section but we remain concerned about what the final version of this chapter will look like. We will continue to work with you by attending workgroup meetings and having conversations with staff over the coming months.

Thank you again for allowing us to participate in this process, and we look forward to working with you to finalize the RTP Guidelines in the coming months at the workgroups and other forums for providing input.

Sincerely,

Bill Sadler, California Senior Policy Manager  
Safe Routes to School National Partnership

Richard Marcantonio, Managing Attorney  
Public Advocates Inc.

Linda Rudolph, MD, MPH, Director,  
Center for Climate Change and Health, Public  
Health Institute

Matthew Marsom, Vice President for Public  
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Jeanie Ward-Waller, Policy Director  
California Bicycle Coalition

Kimberly Chen, Government Affairs Manager  
California Pan-Ethnic Health Network (CPEHN)

Wendy Alfsen, Executive Director  
California Walks

Matt Vander Sluis, Program Director  
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Benjamin D. Winig, Vice President of Law &  
Policy  
ChangeLab Solutions

Matthew Baker, Land Use and Conservation  
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Network

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Bonnie Holmes-Gen  
Senior Director, Air Quality and Climate Change  
American Lung Association in California

Angela Glover Blackwell, President and CEO  
PolicyLink

Nikita Daryanani  
Policy Coordinator  
Leadership Counsel for Justice and  
Accountability

**Appendix:**  
**Recommended Examples of Planning Practices for Inclusion in Appendix M**

In addition to the above, we recommend adding the following documents to the best practices list in Sections 2.7 and 6.13, respectively:

*Examples of Planning Practices to Add to Complete Streets Section (2.7, p. 33):*

- Safe Routes to School National Partnership Complete Streets resources <http://saferoutespartnership.org/state/bestpractices/completestreets>
- The guide [Complete Streets: Making Roads Safe and Accessible for All Users](#) provides information on Complete Streets policies in underserved communities. Produced by the Safe Routes to School National Partnership (2013).
- The National Complete Streets Coalition provides success stories, frequently asked questions, examples, and resources including sample presentations: <http://www.completestreets.org/>
- A Complete Intersections Guide can be downloaded from the Caltrans Pedestrian Safety Resources Website: <http://www.dot.ca.gov/hq/traffops/survey/pedestrian/>
- Accommodating Bicycle and Pedestrian Travel: A Recommended Approach is a policy statement adopted by the United States Department of Transportation. USDOT hopes that public agencies, professional associations, advocacy groups, and others adopt this approach as a way of committing themselves to integrating bicycling and walking into the transportation mainstream: <http://www.fhwa.dot.gov/environment/bikeped/design.htm>
- America Bikes is an umbrella organization that advocates for bicycle funding and policies in the federal transportation bill. Complete streets is a key element of their platform: [http://www.americabikes.org/what\\_are\\_complete\\_streets](http://www.americabikes.org/what_are_complete_streets)
- The National Complete Streets Coalition shows a map with states and local jurisdictions that have adopted complete streets policies: <http://www.completestreets.org/complete-streets-fundamentals/complete-streets-atlas/>

*Examples of Planning Practices to Add to Transit (or Active Transportation) Modal Discussion (Section 6.12):*

- LA Metro, [First and Last Mile Strategic Plan](#), which identified strategies and potential funding sources for improving the areas surrounding transit stations to make it easier and safer for people to access them. SCAG incorporated some of these strategies into its 2016 RTP/SCS as well as short trips strategies to increase the number of trips under three miles that people take by foot or bike.

*Examples of Planning Practices to Add to Active Transportation Model Discussion (Sec. 6.13):*

- “At the Intersection of Active Transportation & Equity” by the Safe Routes to School National Partnership (2015): <http://saferoutespartnership.org/resources/report/intersection-active-transportation-equity>
- Any reason letter doesn’t include NACTO guides? “Urban Bikeway Design Guide” (2014), National Association of City Transportation Officials (NACTO)

- “Urban Street Design Guide” (2012?), NACTO, <http://nacto.org/publication/urban-street-design-guide/>
- We also recommend adding additional language to the active transportation section on emerging and evolving policies and initiatives including Safe Routes to School and Vision Zero. Safe Routes to School is highlighted in the Appendix L as one of the public health strategies, but it is also a critical part of complete streets and modal discussions on active transportation and references to it should be included in these sections as well. Vision Zero should also be mentioned as an emerging initiative that many cities are undertaking to reduce traffic deaths from walking, bicycling and driving. While not yet a regional endeavor, it likely will be before the next update to the Guidelines, and is related to performance measures that seek to reduce fatalities and injuries.

*Examples of Planning Practices to Add to Public Health Section (Appendix L):*

- American Planning Association, 2016. Health Impact Assessment's Role in Planning, <https://www.planning.org/nationalcenters/health/planninghia/>
- Transportation for America, 2016. Planning for a Healthier Future: <http://t4america.org/2016/06/22/introducing-planning-for-a-healthier-future/>

*Examples of Planning Practices to Add to Modeling Section (Ch. 3):*

- Safe Routes to School National Partnership, 2014. Improving Modeling & Data Collection for Active Transportation <https://saferoutescalifornia.files.wordpress.com/2014/06/data-collection-and-modeling-for-active-transportation-06-12-2014-1.pdf>

*Examples of Planning Practices to Add to SCS Section (Sec. 6.22-6.28):*

- Livingston, 2016: [Sustainable Communities Strategies and Conservation: Results from the First Round and Policy Recommendations for Future Rounds](#)
- ClimatePlan, 2016. [Toward a Sustainable Future: Is Southern California On Track?](#)