



October 12, 2016

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

SUBJECT: Comments on the September 2016 Draft California Regional Transportation Plan Guidelines for Regional Transportation Planning Agencies

Dear Ms. Martinez-Velez:

Thank you for the opportunity to review the September 2016 Draft California Regional Transportation Plan (RTP) Guidelines for Regional Transportation Planning Agencies (RTPAs). The Rural Counties Task Force has the following comments and concerns regarding the September 2016 Draft California RTP Guidelines for RTPAs:

Executive Orders

- Interpretation of Executive Orders as law in these RTP Guidelines is premature given that this issue is currently under legal review by the California Supreme Court.
- Executive Order B-30-15 is a requirement for state agencies, not for RTPAs. This needs to be referenced as such and not included as a "shall" in Chapters 6 and 7.

Other Legislation Included in RTP Guidelines with No Direct RTP Requirement

- A number of recently adopted bills are included in Chapter 2 of the RTP Guidelines. Inclusion in the RTP Guidelines implies a requirement (shall) but there is not requirement for the RTP. These bills should be removed or language added to clarify that this is for context purposes only and is not a requirement.
 - AB 1452 – Climate Adaptation
 - AB 246 – Climate Change Adaptation
 - SB 350 – Transportation Electrification
 - SB 379 – Land Use: General Plan: Safety Element (for General Plan Guidelines not for RTPs)

Modeling

- We agree in principle in having comprehensive Modeling guidelines for rural area RTPAs so long as they are reasonable and NOT mandatory.
- Model development, maintenance and applications is challenging for rural RTPAs from a resource and technical capabilities perspective. The RTP Guidelines must recognize this.
- As per the federal regulation (23 USC 135: Statewide and Nonmetropolitan Transportation Planning), it is state's responsibility to coordinate transportation planning efforts for

nonmetropolitan planning areas. We recommend including respective Caltrans District offices, as a responsible party for model development for rural areas, as well.

- A number of specific text comments are included below:
 - Page 56 – In the last paragraph, the sentence starting with “However, the application of...,” the word MPO needs to be replaced with RTPA.
 - Page 57 – We recommend removal of Pricing and Demand management requirements, since they are difficult to model and may not be sensitive in rural areas as they are in urbanized areas.
 - Page 61 – Delete duplicate bullet – “For models with a mode choice step...”
 - Page 66 – Gov. Code 65080(b)(1) – Reference to exceeding 200,000 population, please define this. Is this for an urbanized area or entire county or rural planning area?

Inclusion in Future RTP Guidelines

- Connected Vehicle Program (page 135) – Add a sentence that “a future update of the RTP Guidelines will capture any “should” or “shalls” resulting the rulemaking process.”
- Assessment of Capital Investment and Other Strategies (page 140) – Since it will take years to implement this new federal requirement, the RTP guidelines need to specify what is required for this RTP Guidelines update and what will be included in future RTP Guidelines updates.

RTP Checklist

- Remove item #2 under the Title VI and Environmental Justice section of the RTP Checklist (page 172). Providing mini-grants to local groups for RTP participation is a best practice and is not a requirement and therefore does not belong in the RTP Checklist. Many RTPAs do not have funding to do this.

Performance Measures

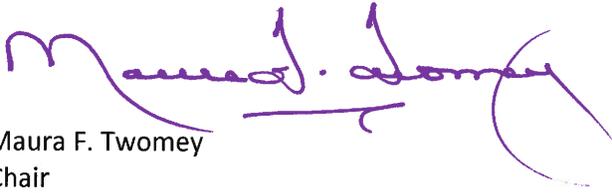
- There is a lot of duplication between Sections 6.1 and 7.1 of the RTP Guidelines (page 107 vs. page 153). Additionally, there is overlap of the discussion of performance measures related issues in Sections 6.19, 6.20, 6.21 and Chapter 7. These sections should be combined into one location.
- The performance measures included in Chapter 7 should be revised to a “should” instead of a “shall” (page 154). The regions must maintain flexibility in what is included as performance measures as it is widely dependent on data availability, modeling capability and priorities of each region. This is not mandated under CGC §14522. The language discussing the potential performance measures needs to be revised to allow more flexibility and remove the references to “shall” (page 156).
- The use of project evaluation criteria is not a requirement of CGC §14522. This language needs to be revised to reflect this as a “should” and not be as prescriptive as to what the evaluation criteria should be.
- Federal performance targets discussed in Section 7.2 (page 156) needs to be revised to clarify and acknowledge that many of these new requirements may not be in current RTP guidelines will be in future RTP planning efforts given the continuing changing dates and timelines slipping. It’s too soon and inclusion is premature.

Public Health

- The public health language on pages 28-29 is too prescriptive. Transportation and the built environment is not the only solution to public health issues. This language needs to be revised to reflect that it is transportation and the built environment is a solution to public health issues.

The Rural Counties Task Force looks forward to continued participation in the update of the RTP guidelines. Thank you for the opportunity to review and comment on the September 2016 Draft California RTP Guidelines for RTPAs. If you have any questions, please contact me at (831) 264-5100.

Sincerely,



Maura F. Twomey
Chair