



October 13, 2016

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

RE: 2016 September Draft California Regional Transportation Planning Agency Regional Transportation Plan Guidelines

Dear Ms. Martinez-Velez:

Thank you for the opportunity to comment on the September draft of the 2016 California Regional Transportation Planning Agency Regional Transportation Plan Guidelines (Draft RTPA RTP Guidelines). As the Regional Transportation Planning Agency for Santa Cruz County, the Santa Cruz County Regional Transportation Commission (SCCRTC) develops the Regional Transportation Plan for Santa Cruz County and coordinates with the Association of Monterey Bay Area Governments (AMBAG) on the Metropolitan Transportation Plan - Sustainable Communities Strategy.

The following comments on the September Draft RTPA RTP Guidelines are respectfully submitted:

1. Overall – There are still many places throughout the document that reference “MPO”. Either remove reference to MPO or if appropriate replace with “RTPA”.
2. Overall – Still feel a lack of clarity in what is required for an RTPA within an MPO since the MPO is already performing many of the “shalls” or “shoulds” for the region and important that there is consistency between the MTP/SCS and the RTP. Add sections that differentiate for these counties that are RTPAs within MPOs.
3. Overall – The “shalls” in the RTP Guidelines should be revised to recommendations (i.e. “shoulds” or “consider”) unless required by statute for RTPAs. There are a number of places in the guidelines where there are specific requirements based on statutes for MPOs but there may not be statutes for RTPAs. The resources needed for this effort are already significant and each additional requirement adds considerably to the resources that are needed to develop this plan.
4. Section 1.0 (page 4) – The Santa Cruz County Regional Transportation Commission has been engaged for about a year in developing the 2040 RTP that will be finalized by June 2018 and a number of important milestones have already been approved by the commission (policy element, complete list of transportation projects and draft financial element will be completed soon). I am hopeful that the 2018 RTP will not have to conform to the 2016 guidelines but not sure how this will be assessed given the changes to the text as follows. “As RTP development is a continuous process, consideration is given to RTPAs that will be too far along in the planning process to conform their RTPs to the 2016 RTP Guidelines. All RTP updates started after the 2016 RTP Guidelines are adopted

by the CTC must use the new RTP Guidelines.” Who would I contact to be assured that the Santa Cruz County Regional Transportation Commission would not have to follow the 2016 guidelines for the 2040 RTP to be completed by June 2018?

5. Section 1.1 – Please clarify that State agencies are required by Executive order B-30-15 to determine full life-cycle costs to compare infrastructure investments but NOT the RTPAs.
6. Section 1.3 – Note in document says “Need to tailor for RTPAs within MPO boundaries – please provide feedback”. The CA government code section 65080 (a) “Each transportation planning agency designated under Section 29532 or 29532.1 shall prepare and adopt a regional transportation plan ....” And 65080 (d) specifies that SCCRTC as a regional transportation planning agency has to adopt and submit a regional transportation plan to the CTC and Caltrans every 4 years. I do not know of any text in the government code that distinguishes between RTPAs within MPOs and non-MPO RTPAs.
7. Section 1.7, page 17 – paragraph titled “Two New Planning Factors” states that RTPAs shall implement two new planning factors... In CFR 450.306 it refers to MPOs not RTPAs. Seems like this should be changed to a “should” rather than a “shall” unless it states this for RTPAs elsewhere. And similarly for all the paragraphs on page 17, does the CFR refer to RTPAs or MPOs?
8. Section 2.3, Page 28, paragraph starting with “Another role..” – Is an RTPA within an MPO required to demonstrate transportation air quality conformity? MPOs required but did not think an RTPA within an MPO has this requirement.
9. Section 2.7, 1<sup>st</sup> paragraph still refers to the MPO. Take out reference to requirements for MPOs where not relevant.
10. Section 2.8, page 40 – Discuss RTPAs within MPOs and requirement to update their RTP every 4 or 5 years but realistically best to update every 4 years at same time as MPOs that are required to be in sync with RHNA every 8 years.
11. Section 2.8 page 41 – Conformity considerations are only for non-MPO RTPAs correct?
12. Chapter 3, - The discussion on travel demand models and all related sections is geared towards non-MPO RTPAs. RTPAs within MPOs will not perform a separate model analysis from the MPO.
13. Chapter 3, page 60 – Counties 1 and 2 are labeled but not sure why these categories of counties are called out separate from others.
14. Chapter 3, page 61 change “shall” to “should” on first bullet regarding bike and ped mode share.
15. Chapter 3, page 65-66 – include Group D - RTPAs within an MPO.
16. Chapter 4, page 73 – “non-MPO RTPAs will also need to conform to the same coordination and consultation requirements as MPOs.” Is this specified in a CFR or should this be changed to a recommendation? Is it correct that RTPAs within an MPO are not required to “coordinate and consult” to the same level as the MPO since this would be duplicative of MPO efforts?
17. Chapter 4, section 4.4 – Is it correct that RTPAs within an MPO do not have to have a separate Public Participation Plan from the MPO? Can this be specified? SCCRTC has worked with AMBAG as the MPO to provide input on the public participation plan for the AMBAG region and has not developed a separate Public Participation Plan. See next point for recommendations on where to refine guidelines to distinguish requirements for RTPAs within MPOs and not in MPOs.
18. Chapter 4, page 75, 1<sup>st</sup> paragraph – discusses MPO requirements. What are RTPA requirements in regards to Title VI and EJ?

19. Chapter 4, page 76 – Are the list of “shalls” for MPOs or RTPAs? If a “shall” for an MPO than should move to the “shoulds”.
20. Section 4.3, page 76- discuss RTPA recommendations, not MPO.
21. Section 4.4, page 77 and 78 – CFR has requirements for MPOs but not for RTPAs – correct? Please change to a recommendation if not required by statute
22. Section 4.5, page 81 – Are the Requirements listed for RTPAs or MPOs? List only requirements for RTPAs and consider putting requirements for MPOs under recommendations and label as requirements for MPOs. And similarly for other requirement sections in Chapter 4.
23. Section 4.7, page 83 – Requirements “RTPAs shall comply as well”. If not required by statute, change to recommendation. If required by statute, specify requirements for RTPAs within MPOs separate from non-MPO RTPAs.
24. Section 4.8, page 84 – States that “An RTPA shall coordinate and consult with resource agencies...”. If not required by statute, change to recommendation. If required by statute, specify requirements for RTPAs within MPOs separate from non-MPO RTPAs.
25. Chapter 5 – Please differentiate requirements for RTPAs within an MPO versus requirements for non-MPO RTPAs.

Thank you again for the opportunity to comment on the 2016 RTPA RTP guidelines. SCCRTC takes pride in developing a regional transportation plan for Santa Cruz County to advance the sustainability goals of our region. The greater the flexibility that is allowed in developing this plan, the better we can serve the local needs of the residents, businesses, and visitors in our county. If you have any questions, please contact Ginger Dykaar, [gdykaar@scrtc.org](mailto:gdykaar@scrtc.org), 831-460-3213.

Sincerely,



George Dondero  
Executive Director