



INYO COUNTY LOCAL TRANSPORTATION COMMISSION



P.O. DRAWER Q
INDEPENDENCE, CA 93526
PHONE: (760) 878-0201
FAX: (760) 878-2001

Clint Quilter
Executive Director

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

SUBJECT: Inyo County Local Transportation Commission (ICLTC) comments on the 2016 Draft California Regional Transportation Planning Agency (RTPA) Regional Transportation Plan (RTP) Guidelines

Dear Ms. Priscilla Martinez-Velez,

California has a multi-faceted system of transportation planning agencies that reflect the diversity of the State. State law has managed to cleverly bend itself to use different requirements for vastly different areas. Please carefully consider the differences in regulatory frameworks for RTPAs in the creation of the 2016 Guidelines. Most relevant to the ICLTC are the large differences between requirements for an RTPA within a Municipal Planning Organization (MPO) compared to RTPAs. The ICLTC is the transportation planning agency for Inyo County and it is not inside of an MPO.

Inyo County is the second largest county in the State of California though it has one of the smallest populations. Only about 1.7% of Inyo County is in private ownership. The remainder of land is owned by a range of federal agencies (92.0 percent), the State of California (2.4 percent), and the Los Angeles Department of Water and Power (3.9 percent). Over 60% of the County is currently designated as federal wilderness. In particular the pattern of land ownership patten in the Owens Valley where the majority of the County's population resides has created a situation suburban sprawl is limited and existing communities maintain distinct and separate boundaries. The population growth in Inyo County between the 1980 census and the current population is less than the margin of error in the census. The imposition of certain modeling or sustainable community strategies requirements in Inyo County is a needless exercise that would struggle to replicate the existing *de facto* blueprint.

Page 45 – Introduction

The introduction makes several misstatements related to the applicability of SB 375 to Regional Transportation Planning Agencies (RTPAs). RTPAs that are not located within the boundaries of a metropolitan planning organization (MPO) are not subject to the provisions of SB 375 that

require addressing regional greenhouse gas (GHG) targets in the RTP and preparation of sustainable community strategies (SCS). This is an important distinction that is blurred in the text.

Pages 45-94 - Modeling Discussion

Though this section does reference the requirements for RTPAs not included in an MPO on page 66, it is done so in such an order where it creates ambiguity especially as to what requirements are in place for an RTPA not included inside of an MPO.

Page 26 and Page 287 – RTIP Acronym Distress

The acronym RTIP is used to describe two or three different things in the document. The acronym described in the glossary (Appendix K) on page 287 refers to something else than the RTIP that is referred to in Appendix A and B. On page 26, on page 191 of Appendix A, and on page 195 of Appendix B the acronym is associated with the STIP. This is the acronym that transportation agencies will be familiar with. It refers to a program proposal of projects presented by each region to the California Transportation Commission for inclusion in the STIP. The acronym on page 7 and 287 for RTIP is used as another name for the FTIP applicable to RTPAs. This creates unnecessary confusion. I made the following comments for pages 101, 112, 116, and 123 before discovering the new use of this acronym. If you look carefully at the use of the RTIP acronym on page 101, it appears that the acronym is used in a third way to refer to the TIP required for MPOs. There are other places in the document such as pages 134, 139, 158, and 162 where the RTIP acronym is also referenced to in this new and confusing way. Please use a more suitable acronym when referring to the FTIP and the TIP and apply the changes globally.

Page 101 - Participation Plan.

The second new paragraph on this page reads “Title 23 CFR Part 450.316(a)(1)(iii) requires the participation plan to use visualization techniques to describe the RTP and **FRTIP**.” This is an incorrect reference to the RTIP. Non-MPO RTPAs do not have the same requirements as MPOs for the creation of a TIP. If you look at the Code referenced to it refers to the TIP. For RTPAs the TIP is presented in the Action Element of the RTP. Therefore, the words “and RTIP” should be deleted from the sentence. The proposed projects are included in the RTP.

Pages 112 - Coordinated Public Transit / Human Services Transportation Plans

This section includes language that states “As with all FTA programs, transit projects selected for funding must be consistent with the RTP and **FRTIP**.” The consistency requirement is switched from the FTIP to the RTIP. This is not correct. The language should still refer to the FTIP. The RTIP is specifically programmed for the State Transportation Improvement Program every two years and only includes projects that require action by the California Transportation Commission. In the case of a rural RTPA such as the ICLTC the FTIP is maintained by the Rural, non-MPO Area Coordinator who updates the FTIP several times a year and in coordination with the Federal transit grant award process.

Page 115 – Introduction to RTP Environmental Considerations

It is premature to include requirements for SB 743 since OPR has not yet released its guidance for the implementation of this bill. It is unclear how SB 743 will influence rural areas like Inyo County where there is no congestion management agency.

Page 116 - Changes to the RTP/FRTIP****

This section reads “When the MPO/RTPA modifies its RTP/RTIP, it must determine whether the proposed changes have the potential to impact the environment and trigger CEQA review.” Again the author has a misunderstanding of the role of an RTIP. The RTIP is produced specifically as a proposal for the STIP. The STIP is exempt from CEQA. CEQA review is required for the RTP and for RTP updates, including an amendment to the Action Element. The reference to the RTIP should be deleted or the text could be revised to read “modifies project lists described in the RTP, it must determine...”

Page 123 – 5.6 Project Intent Statements, Bullet #1

The RTIP is again incorrectly referenced here. The RTIP is not part of the RTP. The Action Element is the place for a financially constrained project list in the RTP.

Page 134 through 141– Financial Overview

There are some differences in the requirements for the creation of a TIP for RTPAs from MPOs that should be further explored in this section. An example of where there is a discrepancy is in the **Potential Funding Shortfall** section where the “Action Plan” is referred to. This does not apply to RTPAs that are not in an MPO.

Page 158 – Coordination with Programming Documents

What? The STIP is now going to become part of the RTIP? Again this is an un-necessary and confusing realignment of acronyms.

162 – Performance Measures

Low traffic volumes make the implementation of performance measures problematic in rural areas. Additionally, the addition of performance measures to grant programs such as the Active Transportation Program negatively impacts the ability of rural area to obtain transportation funding.

Don’t hesitate to contact Executive Director Clint Quilter (cquilter@inyocounty.us) or me, if you have any questions or concerns regarding this matter.

Sincerely,



Courtney Smith, Transportation Planner
Inyo County Local Transportation Commission
PO Drawer Q
Independence, CA 93526
(760) 878-0207
cquilter@inyocounty.us