



August 8, 2016

Katie Benour
Chief, Caltrans Division of Planning
MS-32
P.O. Box 942874
Sacramento, CA 94274-0001

SUBJECT: Comments on the 2016 Draft California Regional Transportation Planning Agency Regional Transportation Plan Guidelines

Dear Ms. Benour:

Thank you for the opportunity to review the 2016 Draft California Regional Transportation Planning Agency (RTPA) Regional Transportation Plan (RTP) Guidelines.

AMBAG has the following comments and concerns regarding the 2016 Draft California RTPA RTP Guidelines:

- AMBAG supports the separation of the MPO and RTPA RTP guidelines.
- The guidelines structure needs to identify specific mandates from statute as “shalls” and potential best practices as “shoulds” throughout the RTP Guidelines.
- Chapter 3 (Modeling) needs to be revised to address what is required by statute (shall) and recommendations (should). Many of the “shalls” included in this section are not required by statute and they need to be identified as recommendations instead. This chapter needs to also include a discussion of the different types of modeling tools and resources used across the various California MPOs and RTPAs. Previously, this chapter had requirements and recommendations that were based on statute and what was reasonable given the capacity for small and large sized MPOs/RTPAs. The changes to this chapter have dramatically increased the modeling requirements for RTPs which would have a huge cost and resources impact that smaller MPOs/RTPAs do not have the resources to meet. Additionally, many of the RTPAs do not have modeling capabilities and often use consultant services or the MPOs for modeling needs.
- Best practices should not be included as a baseline of what is required, but instead provide representative examples from small and large RTPAs of excellent planning work that other MPO can emulate. This is particularly important as it relates to modeling analyses and social equity/environmental justice analyses.
- AMBAG believes it is premature to include requirements for SB 743 as the guidance for this has not been finalized by OPR.

Additionally, AMBAG has specific concerns regarding the following sections:

- Chapter 2, Section 2 – The comment that transportation represents half of GHG emissions is misleading.

- Chapter 2, Section 3, Paragraph 3 – Data/evidence to support such broad statements and conclusions is needed regarding the link between access and overall public health.
- Chapter 3 – The entire modeling chapter has become too prescriptive and needs to be revised to include statute requirements and recommendations.
- Chapter 5, Section 5, Growth Related Impacts – Need to clearly define and detail what data is sufficient to conclude that RTP has no effect on climate change and what statute this requirement is from.
- Chapter 6, Section 11 – Need to reference California Freight Mobility Plan.
- Chapter 6, Section 13 – Need to define “low stress” trips.

AMBAG looks forward to participating in the update of the RTP guidelines. Thank you for the opportunity to review and comment on the 2016 Draft California RTPA Regional Transportation Plan Guidelines. If you have any questions, please contact Heather Adamson of my staff at (831) 264-5086.

Sincerely,



Maura F. Twomey
Executive Director