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August 4, 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 Draft California Metropolitan Planning Organization Regional Transportation Plan Guidelines

Dear Ms. Martinez-Velez:

Thank you for the opportunity to comment on the State's 2016 Draft California Metropolitan Planning Organization (MPO) Regional Transportation Plan (RTP) Guidelines. The Southern California Association of Governments (SCAG) appreciates the State's leadership in updating the RTP Guidelines to reflect recent legislative initiatives. SCAG recognizes the challenges associated with ensuring that State guidance accurately reflects current state and federal requirements for MPOs that are developing and implementing their RTPs.

We have completed our review of the Draft RTP Guidelines and have several concerns regarding the proposed changes. A list of our concerns, comments, and recommendations is included in the attached spreadsheet.

SCAG looks forward to our continued involvement in the State's process for updating the RTP Guidelines. Should you have any questions, please contact Naresh Amatya, Acting Director of Transportation, at 213-236-1885 or amatya@scag.ca.gov.

Sincerely,

HASAN IKHRATA
Executive Director

HI:ca

Attachment: SCAG 2016 Draft MPO RTP Guidelines Comments

The Regional Council consists of 86 elected officials representing 191 cities, six counties, six County Transportation Commissions, one representative from the Transportation Corridor Agencies, one Tribal Government representative and one representative for the Air Districts within Southern California.

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2016 Draft California Metropolitan Planning Organization Regional Transportation Plan Guidelines

#	Chapter/ Appendix	Section	Page	Comment
1	Overall Minor Comment	N/A	N/A	Throughout the document, please review grammar and uses of acronyms to ensure they are consistent in their usage (typically spelled out in full on first instance and consistently – US DOT versus U.S. DOT, AB or Assembly Bill). Please also review references to ARB (sometimes preceded by "the" other times not), the use of % versus percent, the capitalization of State or not, spelling out greenhouse gas or not (GHG), numbering of lists, etc.
2	Overall Comment	N/A	N/A	Throughout the MPO guidelines, there is language stating that the RTP should include all of the strategies, actions, and improvements identified in the Caltrans system planning documents (e.g., TCR or CSMP). These statements do not account for fiscal constraints and the fact that the county transportation commissions decide where to program state dollars. Thus, the guidelines should state that these strategies, actions, and improvements are to provide guidance and should be considered in the development of the RTP.
3	Overall comment	N/A	N/A	Regarding regional needs- It is important to communicate within the guidelines that RTP goals and policies are primarily reflective of local and regional needs, which are developed in consideration of state and federal requirements and recommendations.
4	Overall comment	N/A	N/A	Regarding the relationship to state goals- It is equally important to communicate that, while the RTP goals and policies consider state requirements and recommendations, the development of state goals and policies must also consider priorities identified in RTPs.
5	Chapter 1	1.1	4	The end of the first paragraph states that "Modeling undertaken by the California Air Resources Board (ARB) shows that Vehicle Miles Traveled (VMT) will have to be kept to a 5.5 percent increase through 2030 in order to satisfy the Executive Order (i.e. EO B-30-15)." Please note that ARB is still in the process of updating the Scoping Plan and the SB 375 GHG reduction targets for MPO regions considering Executive Orders. The RTP Guidelines should focus on RTPs meeting the current and future updated SB 375 targets and should not state or imply that regions place a cap or target on absolute VMT or on VMT growth.

#	Chapter/ Appendix	Section	Page	Comment
6	Chapter 1	1.1.	4	The text currently reads: "And more recently, in 2015, Governor Brown issued Executive Order B-30-15 establishing a California GHG reduction target of **40** percent below 1990 levels by **2050** which is being addressed through the **development** of the statewide long-range transportation plan, the California Transportation Plan (CTP) 2040." To be factually correct, it should read: "And more recently, in 2015, Governor Brown issued Executive Order B-30-15 establishing a California GHG reduction target of **40** percent below 1990 levels by **2030** which is being addressed through the **implementation** of the statewide long-range transportation plan, the California Transportation Plan (CTP) 2040." **The RTP Guidelines should also make it clear that the Governor's Executive Order applies to all sectors, not just transportation.**
7	Chapter 1	1.1.	4	The text currently reads: "Transportation infrastructure investment **affect** travel patterns, mode choice, and VMT. Numerous studies show that investments in roadway capacity **increase tend** to cause increases in VMT and GHGs." Please revise to read: "Transportation infrastructure investment **affects** travel patterns, mode choice, and VMT. **In general, the guidelines recognize that studies show that investments in roadway capacity tend to cause increases in VMT and GHGs, however, there are exceptions depending on project location and the current transportation network."**
8	Chapter 1	1.2	5	The text currently reads: "In addition, SB 391 **requires** Caltrans to update the CTP by December 31, 2015, and every 5 years thereafter." Please revise text to read: "In addition, SB 391 **required** Caltrans to update the CTP by December 31, 2015, and every 5 years thereafter."
9	Chapter 1	1.3	8	Please delete the following sentence: "The latest Federal surface transportation reauthorization bill called the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) was signed into law in 2005." More recent surface transportation bills (MAP-21 and the FAST Act) have been adopted.

#	Chapter/ Appendix	Section	Page	Comment
10	Chapter 1	1.6	16	Regarding the following: "The regulatory language (CEQA Guidelines changes) to implement the law are pending, though VMT has been identified by the Governor's Office as the **preferred** metric to determine significant impacts." Since implementation details of SB 743 are still pending, the term "preferred" should be revised to "**potential.**"
11	Chapter 2	2.3	26	SCAG recommends a broader look at how the transportation system and land use patterns affect public health outcomes beyond active transportation. SCAG included seven focus areas in its 2016 RTP/SCS related to health. 1. Access to Essential Destinations: Improve access for the region to a variety of essential destinations and employment hubs. 2. Affordable Housing: Promote residential infill development with proximity to jobs and essential services in mind. 3. Air Quality: Reduce criteria pollutants and greenhouse gas emissions by reducing vehicle miles traveled (VMT) per capita and supporting clean vehicle technologies and new mobility options. Also, promote reduced exposure to emissions through land use decisions. 4. Climate Adaptation: Support efforts to mitigate climate change and make the region more resilient to future changes with reductions in VMT and greenhouse gas emissions. 5. Economic Opportunity: Support economic activity by providing regional competitiveness and jobs through the construction of transportation projects. 6. Physical Activity: Support increased rates of activity with better access to transit, improved conditions for walking and bicycling, improved access to parks and more compact development patterns. 7. Transportation Safety: Improve transportation safety with increased rates of transit, walkable and bikeable neighborhoods, and improvements to the regional roadway network.
12	Chapter 2	2.3	26	SCAG recommends incorporating a broader discussion of how the SCS works in tandem with the RTP to address health issues. This is especially relevant given the new General Plan Guidance by OPR on how cities can incorporate health into their general plans. https://www.opr.ca.gov/docs/DRAFT_General_Plan_Guidelines_for_public_comment_2015.pdf

#	Chapter/ Appendix	Section	Page	Comment
13	Chapter 2	2.3	26	Definitions for Health in All Policies, Health Equity, and Social Determinants of Health should be included and discussed.
14	Chapter 2	2.3	27	SCAG appreciates the strong focus on active transportation and access but would suggest expanding this portion to include additional focus areas. SCAG conducted extensive research on the intersection of the built environment and public health as part of the 2016 RTP/SCS and recommends CTC review this information. http://scagrtpscs.net/Documents/2016/proposed/pf2016RTPSCS_PublicHealth032816.pdf
15	Chapter 2	2.3	27	Guidance should be provided on the use of performance measures that can be used to evaluate public health outcomes. Data sources should also be provided.
16	Chapter 2	2.6	30	In the first bulleted list there is no mention of consistency between county-wide LRTPs. Please consider adding "Long Range Transportation Plans (LRTPs)" as part of the list of documents.
17	Chapter 2	2.6	30	In the second bulleted list, please consider adding "District System Management Plans (DSMPs)."
18	Chapter 2	2.7	32	In the section under Complete Streets, we suggest that commercial vehicles also be recognized as important players within the framework of Complete Streets. Vibrant urban environment cannot function without commercial vehicles delivering goods that sustain the economic activities that take place. Inclusion of commercial vehicles and their operational needs within the context of Complete Streets will provide additional considerations to what safety, street designs, or roadway geometry may mean, thereby complementing and completing the concept it stands for.
19	Chapter 2	2.7	36	Please consider adding the following language as referenced from the California Corridor Mobility webpage: "A CSMP results in a listing and phasing plan of recommended operational improvements, Intelligent Transportation System (ITS) strategies, and system expansion projects to preserve or improve performance measures within the corridor."

#	Chapter/ Appendix	Section	Page	Comment
20	Chapter 5	N/A	N/A	Since tiering off from a Programmatic EIR offers several benefits, and yet it has not been widely used by project-level EIRs, we suggest Chapter 5 provide guidance on the use of tiering from a programmatic EIR for the RTP, should the project-level lead agency chooses to use tiering to streamline the EIR process. Sample language regarding tiering: Tiering refers to environmental review of sequential actions, where general matters and environmental effects are examined in a broad EIR for a decision such as adoption of a policy, plan, program, or ordinance, and subsequent narrower or site-specific EIRs are prepared that incorporate by reference the prior EIR and concentrate on environmental effects that can be mitigated or that were not analyzed in the prior EIR. In such instances, the later narrow EIR "tiers" off the prior broad EIR. If a project-specific EIR tiers off from a broader prior EIR such as the Programmatic EIR prepared for a RTP, it could help eliminate repetitive discussions of the same environmental issues; facilitate project-level impact analysis by focusing on issues specific to the later project; reduce the burdens from duplicative reconsiderations of a program, plan or policy with a certified EIR; and reduce CEQA delay and paperwork at project level.
21	Chapter 5	5.1	117	Regarding the following statement: "The regulatory language (CEQA Guidelines changes) to implement the law are pending, though VMT has been identified by the Governor's Office as the preferred metric to determine significant impacts. A future update of the RTP Guidelines will capture any 'shoulds' or 'shalls' resulting from the formal rulemaking process." Since implementation details of SB 743 are still pending, the term "preferred" should be revised to "**potential.**"
22	Chapter 5	5.4	121	Page 121 references programmatic mitigation as an optional framework in federal environmental reviews "to address the potential environmental impacts of future transportation projects." In addition, the SB 743 Draft CEQA Guidelines and Technical Advisory references the potential use of programmatic approaches for evaluation of VMT impacts. It is suggested that the RTP Guidelines include reference to an option for a programmatic approach to the CEQA analysis of transportation impacts of transportation projects. A programmatic approach need not be required, but should be acknowledged as an option in the RTP Guidelines.

#	Chapter/ Appendix	Section	Page	Comment
23	Chapter 5	5.5	124	Regarding the following statement: "The transportation sector **is a significant source** of GHG emissions and therefore the analysis of these emissions **indirectly** resulting from the implementation of RTPs is especially important to analyze and mitigate." Revise the statement to read: "The transportation sector is **one of multiple significant sources** ~~a significant source~~ of GHG emissions and therefore the analysis of these emissions ~~indirectly~~ resulting from **new growth throughout California** ~~the implementation of RTPs~~ is especially important to analyze and **for RTPs to** mitigate. **As a result of cleaner fuel technology, the transportation sector may become a less significant source of GHG emissions in the future."**
24	Chapter 5	5.5	124	Regarding the following statement: "Each MPO must … propose feasible and enforceable mitigation measures to reduce or minimize the emissions." RTPs are intended to maximize the use of feasible mitigation measures to reduce or minimize greenhouse gas emissions. As noted in the previous comment, RTPs do not worsen greenhouse gas emissions which are contributed by new growth in the region and throughout California. While we recognize the importance of requiring each MPO to propose feasible and enforceable mitigation measures to reduce or minimize the emissions, it is important to recognize that some MPOs with no implementation authority cannot enforce mitigation measures. However, as permitted by CEQA Guidelines Section 15126.4 (a)(1)(B), MPOs may include performance standards-based mitigation measures in CEQA documents for the RTPs to fulfill the MPOs' CEQA obligations when they act as lead agency for the RTP/SCS. As such, we suggest the aforementioned sentence be revised to state: "Each MPO must … propose feasible and enforceable mitigation measures to reduce or minimize the emissions, where applicable and appropriate."

#	Chapter/ Appendix	Section	Page	Comment
25	Chapter 5	5.5	124	Regarding the following statement: "Simply demonstrating that an RTP can achieve the GHG reduction targets set by the ARB is not sufficient to conclude that the RTP has no impact on climate change" - As noted in the previous comments, growth has an impact on greenhouse gas emissions. RTPs do not worsen the emissions, and the transportation sector is one of many significant sources of the greenhouse gas emissions. While growth is evitable, the RTPs serve to mitigate climate change impacts to the extent that is feasible and practicable. As such, we suggest the sentence be revised to read: "Given that growth is largely inevitable and the RTP maximizes the use of measures to mitigate adverse impacts from growth, simply demonstrating that an RTP can achieve the GHG reduction targets set by ARB is not sufficient to conclude that the RTP has no impact on climate change."
26	Chapter 6	6.11	147	Under the first Goods Movement paragraph, we suggest following changes to positive impacts and negative impacts as currently identified: Consider improvements to truck speed and reliability, freight bottleneck relief, access to goods and product diversity as positive impacts, and add roadway congestion and delays as negative impacts.
27	Chapter 6	6.11	147	Under the second Goods Movement paragraph where a revised sentence is inserted, we would like to highlight that, in Southern California, our Ports and individual terminal operators make decisions on deployment of new technologies or implementation of projects that take place within the port properties. We work closely and collaboratively with our Ports, however, MPO's limitations should also be recognized so as not to place non-implementable responsibilities. Regarding the sentence that immediately follows this new insertion- while we agree that moving goods via rail would likely reduce truck emissions, we would like to state that the modal split decisions between rail and trucks are generally driven by goods' consumption points, and are made by either cargo owners or logistics providers. It does not make sense to move goods that are locally consumed via rail as rail movements are more suitable for long-distance trips. Also, in Southern California, much of our freight rail mainline system is shared with commuter rail service. To increase the service frequency for freight or commuter rail requires a careful consideration to balance demand for both services.

#	Chapter/ Appendix	Section	Page	Comment
28	Chapter 6	6.11	148	Regarding Item 5- while the bullet point identifies the region's projected population growth as a factor that affects the demand for goods movement, we would like to provide additional considerations for drivers of goods movement, especially for regions that serve as international gateways. These include national population growth, consumption patterns, manufacturing practices and purchasing power of the region, nation, and the world. These factors influence global supply chain practices, ultimately influencing how goods are moved locally. While we recognize that not all regions in the State deal with global commerce, these are important considerations to be given as we look into our region's and the State's ability to continue moving goods effectively.
29	Chapter 6	6.11	148	Regarding Items 4 and 8, we would like to clarify the nexus and subsequent planning considerations between seaport and airport cargo handling capabilities and their implications to the land side freight transportation system. The ability for seaports and airports to handle increased volume of cargo has direct impacts on the volume of cargo that would be moved through the land side infrastructure. Similarly, the land side freight transportation system's ability to handle increased volume of cargo could be a constraint on seaports and airports ability to handle cargo. While the access to these facilities are critical to move goods, the symbiotic relationship between ports capacity and land side capacity should be more clearly identified as an important planning consideration. To this end, Items 4 and 8 could be presented in tandem to highlight the nexus between system bottlenecks and gaps to addressing overall freight transportation system capacity.
30	Chapter 6	6.12	154	Please remove Items 3, 6, and 7. Though military airfields and installations should be consulted as a part of the MPO planning process, it seems premature to require MPOs to take an active role in the planning of these facilities.
31	Chapter 6	6.18	163	Please revise this section to note that the Federal Highway Administration is in the process of developing and finalizing the national performance management measure regulations to assess the performance of the National Highway System, Freight Movement on the Interstate System, and the Congestion Mitigation and Air Quality Improvement Program.
32	Chapter 6	6.19	166	Please revise this section to reflect the requirements of the Safety Performance Management Measures Final Rule.

#	Chapter/ Appendix	Section	Page	Comment
33	Chapter 6	6.2	180	There should be a suggestion to include disadvantaged groups that are not defined by the traditional parameters of the low income and minority groups, such as groups identified as disadvantaged due to environmental impacts identified under CalEnvironScreen (SB 535). A good place to put it might be in the section on "Social Equity in the SCS."
34	Appendix L	-	293	These sections should be compiled by topic instead of by MPO to help readers address desired focus areas for inclusion in their RTP/SCSs. In addition, the focus areas are very active transportation heavy. Additional recommended focus areas should be included.