



October 17, 2017

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

Dear Ms. Martinez-Velez:

On behalf of the Sacramento Area Council of Governments I am submitting these comments on the September 2016 draft of the MPO RTP Guidelines. The RTP is a programmatic document with a very specific area of control and influence, which is defined in federal and state statute. The comments in this letter therefore encourage the CTC to keep requirements in the Guidelines relevant to things under control or influence of MPO, within the scope of the RTP, and at a scale that is compatible with a programmatic document.

Global Comments on the RTP Guidelines

The RTP Guidelines should help guide RTP development and should be spare with regard to specific guidance on transportation project design features. The guidelines should acknowledge that many projects included in the RTP have not even begun the project development process. Guidelines should, whenever possible, remain broad enough so that the level of analysis required is suitable for a programmatic document.

The RTP Guidelines should guide MPOs through the myriad statutory requirements (federal and state) and optional but beneficial steps that constitute the RTP update process so that MPOs can meet their statutory obligations and align the RTP with the larger state goals. To that end, the State – as the CTC and other state agencies with interest in the RTP process – should use its own plans to inform its participation in RTP processes. The state must act in partnership with MPOs by implementing its own statewide plans in its local acts of participation in RTP updates. For example – Caltrans local districts, in partnership with Caltrans headquarters and the CTC, should use these state plans to inform their participation in the RTP update during their regular consultation, partnering, and comment opportunities. These opportunities include review of RTP policy priorities, the submission and review of transportation investments during RTP scenario development, and during regular outreach conducted by MPOs with state and local partners.

Comments on Chapter 2: Regional Transportation Plan Process

Guidance suggesting incorporation of other state and local planning documents into the RTP should leave room for the MPO to use more recent or accurate information, account for varied update schedules, allow for regional priority setting, and avoid conflicts with financial constraint requirements on the RTP. Additionally, planning documents, such as CSMPs that create new analysis areas, may not be aligned or compatible with the analysis areas used during the creation of an RTP. The guidelines should take this into account when suggesting that MPOs provide detailed information for analysis areas used in other planning documents.

Pages 26-29, Section 2.2, Background on State Climate Change Legislation & Executive Orders, lists and describes a number of executive orders and legislative actions that influence transportation planning at the state level but, generally, do not directly address the development of regional transportation plans (e.g. AB 1482 and SB 379). Notable exceptions include AB32 and SB375. Consider highlighting legislation that provides specific guidance or requirements to MPOs developing RTPs so that these items are more readily apparent. For other legislation, consider adding language that MPOs are encouraged to consider and incorporate, where relevant, policies and strategies that support requirements placed on the state. In general, information and background provided in the guidelines should be directly and obviously tied to how that information needs to be incorporated into the RTP.

Pages 34-35, Section 2.6, Consistency with Other Planning Documents, has the addition of 14 planning documents to the list of 17 plans that should be consulted during the RTP update process. With regard to state-prepared planning documents, we recommend that the State determine how best it should use these plans in its interface with the RTP update process. For each plan the State creates, what is it going to do to support regions in implementing that State plan? How much alignment is there already between the 11 state planning documents that already exist? If there is substantial alignment between all of these plans, consider how the state could work with MPOs to translate those plans into its own role in interacting with MPOs on the RTP updates.

Comments on Chapter 3: Regional Transportation Plan Analysis and Modeling

SACOG is providing comments to the CTC on Chapter 3 through the Modeling workgroup.

Comments on Chapter 6: Regional Transportation Plan Content

Page 135, Section 6.1, Policy Element: The RTP is not an aggregation of local transportation and land use policies. Although all RTPs should be developed in consultation with local jurisdiction transportation and land use policies, as financially constrained plans, RTPs will not necessarily reflect all of the transportation and land use policies of local jurisdictions. For this reason, recommend removing "of the local jurisdictions" as shown below:

The Policy Element should clearly convey the region's transportation and land use policies ~~of the local jurisdictions~~. As part of this Element, the discussion should: (1) relay how these policies were developed, (2) identify any significant changes in the policies from the previous plans and (3) provide the reason for any changes in policies from previous plans. The Policy Element should clearly describe the SCS strategies, including land use, transportation, and other measure intended to reduce ~~per capita~~ GHG emissions from passenger ~~vehicles travel~~. It should also explain how the financial commitments are consistent with and support the land use pattern and personal mobility objectives of the RTP.

Page 147, Section 6.8, Highways: Project level design and development does not occur as part of the RTP update, which would make this comment irrelevant. For this reason, recommend removing Item 12 as shown below:

~~12. Include community participation in the design and development of highway transportation projects.~~

Page 151, Section 6.11, Bicycle & Pedestrian: This section identifies a number of bicycle and pedestrian issues that should be discussed in the RTP. An example was added to Item 2 in the list (Safe Routes to School). While this is a notable example, it is the only example listed in the list of 5 issues. If it is to be kept, each issue should have examples to illustrate each point and, as with other specific policies or programs, they are not required by state or federal law, they should be listed in Appendix M instead of in the Guidelines so as to clarify required versus recommended activities.

Page 153, Section 6.12, Goods Movement: Section 6.12 identifies goods movement as an important component of the planning process for an RTP and lists a number of issues or activities that should be included in the RTP discussion on goods movement. This list includes a number of new activities from the previous set of guidelines. Please specify these activities as a list of best practices or things that "may be included" or "are encouraged" in the discussion on goods movement, to emphasize that these are recommendations rather than requirements. Where any requirements exist for including goods movement in RTPs, those should be identified under the subheading of "requirements" as in other sections of the guidelines.

Page 178, Section 6.26, SCS Development, Visualization and Mapping: A new paragraph was added that cites Urban Footprint as the planning tool for visualization and mapping. Urban Footprint is certainly a planning tool, but there are other planning tools (Envision Tomorrow, Envision Tomorrow +, Community Viz, UrbanSim) that should be described alongside Urban Footprint as planning tools, and any text describing different examples and applications of planning tools should be moved to Appendix M.

Page 179, Section 6.26 SCS Planning Assumptions: Section 6.26 discusses the topics on which MPOs must consult cities and counties. Edits were made to the section that emphasize RHNA over all other factors. While RHNA and related issues are important topics on consultation, they should identified with equal weight to other general plan factors. Recommend editing the language to equally emphasize general plans and RHNA as shown in strike-out/underline, below.

In developing an SCS, an MPO shall consult with cities and counties about their existing general plans and foreseeable changes to their general plans over the period covered by the RTP, ~~particularly including regarding RHNA, residential zoning, and programmatic actions addressed in the local housing element and status of housing element update requirements~~ MPOs are also required by Government Code Section 65080(b)(2)(G) to consider spheres of influence that have been adopted by the Local Agency Formation Commissions (LAFCOs) within the region during development of the SCS. Further, MPOs should consult with LAFCOs within the region regarding municipal service review boundaries, foreseeable changes to those boundaries and service capacities over the period covered by the RTP as well as any local LAFCO adopted policies regarding preservation of agricultural and open space land, island annexations, annexations, service extensions and sphere changes. MPOs are also encouraged to request the most recent Municipal Service Reviews for local agencies providing services in the region, as well as, LAFCO-prepared GIS maps, if available, for all local agency boundaries and spheres of influence in the region.

Page 185-186, Addressing Resource Areas and Farmland: Recommend moving text describing MPO examples and all "best practice" examples to Appendix M, consistent with the format of the rest of the Guidelines document.

Comments on Chapter 7: Performance Measures

Given that the RTP Guidelines will be updated before federal rule-making is complete on performance management, we propose that Chapter 7 RTP Guidelines define the way that performance measures and associated targets should be created, rather than defining the performance measures and targets themselves.

The Guidelines should distinguish between the performance measure categories that will be required by federal transportation performance rule-making first introduced by MAP-21 and additional categories of performance measures not explicitly related to federal rule-making. The RTP guidelines is an opportunity to emphasize the value of MPOs collaborating together and with Caltrans in selecting performance measures and setting targets.

Many MPOs in California are committed to performance-based planning and decision-making. We use many performance measures to understand the performance of our RTPs and their effect on different issues. We make a good faith effort to improve our capacity to better measure effects

and measure new effects with every update of the RTP. We have a track record of doing this with the engagement of the stakeholders interested in and affected by the RTP. The RTP update process engages a broad range of stakeholders at all levels of the public and private sector. Consequently, MPOs are acutely aware of the importance of developing performance measures and targets that are meaningful for policy development in our respective regions. Performance-based planning works best when a collaborative process is used to reach agreement on a focused and useful set of measures and targets.

The effectiveness of performance measures is also determined by the type of data and analytical tools, such as a travel model, available – and this varies widely across MPOs. The process for defining the specific metric for the SB 375 GHG targets is an excellent case study to inform and guide readers through an understanding of what it means to set a performance target:

1. MPOs analyzed their adopted RTP for the performance indicator of interest (GHG emissions) and in doing so worked with the regulating state agency – ARB – to ensure that the analysis used consistent long-range planning assumptions statewide and to the degree practicable.
2. ARB used the results of Step 1 to compile GHG emissions estimates for each MPO in a base year and target years. This involved learning and accounting for differences in results to ensure consistency in comparing across MPOs.
3. MPOs worked through a bottom up process from regional and local officials and stakeholders to develop parameters for preparing sensitivity analyses and multiple scenarios to test effectiveness of various approaches to help identify targets.
4. MPOs analyzed alternatives scenarios to provide a range of acceptable targets for ARB to use in developing a statewide target.
5. ARB considered feedback from MPOs and other stakeholders on the target.
6. ARB staff recommended draft targets to its Board.
7. ARB, MPOs and others continued to exchange technical information and modeling results prior to final target setting.

It should be noted that this process of target setting also created a *common understanding* from which the ARB, MPOs and stakeholders could interact on the evaluation of future RTPs and the update of the targets.

Similarly, the process that SCAG, SACOG, OPR, SGC, and DPH went through to develop the public health module was a collaborative effort to develop an analytical tool on the health effects of transportation and land use form. The module was developed using the best available data, a world class consultant team, and a technical advisory committee of transportation, land use, and public health experts. In their RTP SCS process SCAG used this module to estimate health effects related to some of the sub areas in the region. Separating the transportation and land use effects from the more dominant contributing effects, particularly demographics, was a difficult process but very useful not only to SCAG but to all MPOs as a fine example of groundbreaking planning.

Priscilla Martinex-Velez
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Thank you for your consideration. If you have any questions regarding these comments, please contact Kacey Lizon at (916) 397-5272 or klizon@sacog.org.

Sincerely,



Mike McKeever
Chief Executive Officer