



October 12, 2016

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**SUBJECT: Comments on the September 2016 Draft California Regional Transportation Plan Guidelines for Metropolitan Planning Organizations**

Dear Ms. Martinez-Velez:

Thank you for the opportunity to review the September 2016 Draft California Regional Transportation Plan (RTP) Guidelines for Metropolitan Planning Organizations (MPOs). AMBAG has the following comments and concerns regarding the September 2016 Draft California RTP Guidelines for MPOs:

**Executive Orders**

- Interpretation of Executive Orders as law in these RTP Guidelines is premature given that this issue is currently under legal review by the California Supreme Court.
- Executive Order B-30-15 is a requirement for state agencies, not for MPOs. This needs to be referenced as such and not included as a “shall” in Chapters 6 and 7.

**Modeling**

- AMBAG does not fall within any of the identified categories of Regions 1-4. A new category needs to be established that includes the following characteristics that have reduced modeling requirements that fall somewhere in between the current Region 2 and Region 3.
  - MPOs with attainment air quality
  - Slow growth in population and jobs
  - Little to some congestion
  - No significant capacity enhancing projects
  - Contain an urbanized area less than 200,000
- Group A is for RTPAs only and does not belong in the RTP Guidelines for MPOs (page 75).
- Under the State Requirements for Group B MPOs – No TMAs (1) Attainment Areas (page 79), Gov. Code §65080(b)(1), the text should be updated to allow flexibility in the types of performance measures included in the RTP.
- The modeling requirements for RTPs have dramatically increased. This would have a huge cost and resources impact to smaller MPOs such as AMBAG. We cannot meet these requirements given our limited funding resources.

### **Other Legislation Included in RTP Guidelines with No Direct RTP Requirement**

- A number of recently adopted bills are included in Chapter 2 of the RTP Guidelines. Inclusion in the RTP Guidelines implies a requirement (shall) but there is not requirement for the RTP/SCS. These bills should be removed or language added to clarify that this is for context purposes only and is not a requirement.
  - AB 1452 – Climate Adaptation
  - AB 246 – Climate Change Adaptation
  - SB 350 – Transportation Electrification
  - SB 379 – Land Use: General Plan: Safety Element (for General Plan Guidelines not for RTPs)

### **Project Selection Criteria Used**

- The sentence regarding the project criteria used to select constrained and unconstrained project lists needs to be revised because not all MPOs are responsible for prioritizing projects. (page 136). Suggested language: *“In addition, the RTP should identify the criteria that the MPO or RTPA/County Transportation Commission, used to select the transportation projects on the constrained and unconstrained project lists.”*

### **Inclusion in Future RTP Guidelines**

- Connected Vehicle Program (page 169) – Add a sentence that “a future update of the RTP Guidelines will capture any “should” or “shalls” resulting the rulemaking process.”
- Assessment of Capital Investment and Other Strategies (page 173) – Since it will take years to implement this new federal requirement, the RTP guidelines need to specify what is required for this RTP Guidelines update and what will be included in future RTP Guidelines updates.
- Designing a Forecasted Development Pattern in the SCS (page 187) – *“Design and layout of transportation facilities to facilitate access to charging in low- and moderate-income neighborhoods, as well as wealthier neighborhoods.”* is not a requirement. Please remove. Transportation Electrification is adequately discussed on page 170.

### **RTP Checklist**

- Remove item #2 under the Title VI and Environmental Justice section of the RTP Checklist (page 222). Providing mini-grants to local groups for RTP participation is a best practice and is not a requirement and therefore does not belong in the RTP Checklist. Many MPOs do not have funding to do this.

### **Best Practices**

- There are a number of best practices still included in Chapter 6 (Section 6.26). These should be moved to Appendix M to ensure consistency throughout the document.
  - Visualization and Mapping
  - Addressing Resource Areas and Farmland

### **Performance Measures**

- There is a lot of duplication between Sections 6.1 and 7.1 of the RTP Guidelines (page 136 vs. page 202). Additionally, there is overlap of the discussion of performance measures related issues in Sections 6.20, 6.21, 6.22 and Chapter 7. These sections should be combined into one location.
- The performance measures included in Chapter 7 should be revised to a “should” instead of a “shall” (page 202). The regions must maintain flexibility in what is included

as performance measures as it is widely dependent on data availability, modeling capability and priorities of each region. This is not mandated under CGC §14522. The language discussing the potential performance measures needs to be revised to allow more flexibility and remove the references to “shall” (page 204).

- The use of project evaluation criteria is not a requirement of CGC §14522. This language needs to be revised to reflect this as a “should” and not be as prescriptive as to what the evaluation criteria should be. Additionally, it should be acknowledged that not all MPOs have the authority to prioritize projects. This is often done at the RTPA or County Transportation Commission level.
- Federal performance targets discuss in Section 7.2 (page 204) needs to be revised to clarify and acknowledge that many of these new requirements may not be in current RTP guidelines will be in future RTP planning efforts given the continuing changing dates and timelines slipping. It’s too soon and inclusion is premature.

### Miscellaneous

- With the added requirements in the new Draft Guidelines, has there been a cost assessment or feasibility analysis of these new requirements? Given AMBAG’s limited resources and the fact that we do not receive any state funding for planning unless it’s through a competitive grant. All of our planning work for the MTP/SCS is funded by federal PL funding and that is limited as well.
- The public health language on pages 30-32 is too prescriptive. Transportation and built environment is not the only solution to public health issues. This language needs to be revised to reflect that it is transportation and the built environment is a solution to public health issues.
  - Remove last bullet “identify specific mitigation measures that the MPOs is taking to reduce health impacts from the transportation sector.” Often MPOs are not the responsible agency to implement such measures.

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

Sincerely,



Maura F. Twomey  
Executive Director