



October 13, 2016

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

Subject: 2016 Second 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 second 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. In addition, SCAG appreciates the State's efforts towards addressing our agency's concerns, comments, and recommendations as part of the recently revised second Draft MPO RTP Guidelines. SCAG again 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 second Draft MPO RTP Guidelines and have additional 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,

A handwritten signature in black ink, appearing to read 'Hasan Ikhata', written in a cursive style.

HASAN IKHRATA
Executive Director

HI:dt

Attachment: SCAG 2016 Second Draft MPO RTP Guidelines Comments

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2016 Second Draft California Metropolitan Planning Organization Regional Transportation Plan Guidelines Comments

#	Chapter/ Appendix	Section	Page	Comment
1	Chapter 2	2.2	29	The Guidelines would benefit from referencing Governor Brown's signing of SB 32 in September 2016. SB 32 requires the State to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030, and essentially codifies Executive Order B-30-15.
2	Chapter 2	2.3	30	<p>Additional information was added to Section 2.3. However this section could be better organized and refined to explain additional focus areas. Currently it focuses primarily on what MPOs have traditionally done and does not include more innovative work pursued by MTC, SCAG, and SANDAG.</p> <p>Appendix L does a very good job of outlining these opportunities. SCAG recommends a bulleted list here to highlight these areas. In the appendix, SCAG recommends a separate bullet to specifically focus on Affordable Housing.</p>
3	Chapter 2	2.3	30	<p>Section 2.3 provides only a cursory look at the connection of land use and health as it relates to community cohesion. A discussion should be included on how MPOs can work with local jurisdictions to support land use patterns that provide access to open space, a mix of uses, access to jobs, affordable housing, etc.</p> <p>Additionally, there should be a discussion about how MPOs can work with local jurisdictions to reduce the negative impacts of climate change on health such as reducing the heat island effect, vector borne illnesses, etc.</p>
4	Chapter 2	2.3	30	<p>The following is a previously submitted comment which was noted as comment incorporated in Appendix L: "Definitions for Health in All Policies, Health Equity, and Social Determinants of Health should be included and discussed." However, the definitions were not added to Appendix K or discussed in Section 2.3.</p> <p>Appendix L includes these definitions. SCAG recommends adding them to Appendix K as well. SCAG recommends contacting the Office of Health Equity for a health equity definition as well.</p>
5	Chapter 2	2.3	30	<p>The following is a previously submitted comment which was noted as comment incorporated in Appendix L: "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." There is no discussion of this in Section 2.3. It will be important to at least outline what is in Appendix L in Section 2.3 so that readers who browse through this section realize there is additional detail there.</p>

2016 Second Draft California Metropolitan Planning Organization Regional Transportation Plan Guidelines Comments

#	Chapter/ Appendix	Section	Page	Comment
6	Chapter 2	2.3	30	Regarding the following statement: "However, local jurisdictions primarily lead the planning and implementing of active transportation infrastructure and supportive land uses, and land use patterns play at least as large a role in encouraging more active mode choices." The way this is currently worded implies that MPOs have very little power to influence rates of active transportation. SCAG recommends that it be reworded to state: "MPOs can play an important role in setting regional priorities and providing access to funding to local jurisdictions for active transportation projects. In addition, they can provide resources and technical assistance to access statewide funding such as the Active Transportation Program. Finally, they can encourage local cities to develop land use patterns that are supportive of walkable and bikeable communities by providing planning funding and including supportive policies or guidance in their SCS."
7	Chapter 2	2.3	30	The section is now titled, "Promoting Public Health and Public Health Equity," but it does not include a discussion on equity. At a minimum, it should include Disadvantaged Communities and how MPOs can ensure that the investments they are making are benefiting disadvantaged communities. It could also discuss how investments will affect low income and minority populations, ensuring that these communities have the resources they need to have a high quality of life and access to needed destinations. For assistance on Health Equity language contact the California Office of Health Equity via email at OHE@cdph.ca.gov or (916) 445-4139.
8	Chapter 2	2.3	30	This section outlines what local and state agencies can do, but these guidelines are intended to help MPOs develop strategies and actions. SCAG recommends adding language that illustrates how MPOs can assist local jurisdictions in achieving their goals, and how the MPOs can assist in implementing the state and federal requirements through policies or funding opportunities.

2016 Second Draft California Metropolitan Planning Organization Regional Transportation Plan Guidelines Comments

#	Chapter/ Appendix	Section	Page	Comment
9	Chapter 5	5.1	115	<p>In the fourth paragraph under Section 5.1, we suggest including the CEQA exemption opportunity for certain residential, employment center, or mixed-use development projects with specific plans for which EIRs have been certified (Public Resources Code 21155.4). The statement should be revised as follows to include the text in bold: “A change to transportation analysis in environmental review under CEQA occurred with the Governor’s approval of SB 743, which requires an update in the metrics of transportation impact used in CEQA from Level of Service and vehicle delay to one that promotes the reduction of GHGs, the development of multimodal transportation networks, and a diversity of land uses for transportation priority areas. Except any of the events specified in Public Resources Code Section 21166, a residential, employment center, or mix-use development project, including any subdivision or any zoning change is exempted from SB 743 requirements if the project is (a) within a transit priority area; (b) to implement and consistent with a specific plan for which an EIR has been certified; (c) consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in an ARB-accepted sustainability communities strategy or alternative planning strategy (Public Resources Code Sections 21155.4 and 21099; Government Code Section 65080).”</p>
10	Chapter 5	5.5	124	<p>Regarding the following statements: "Agencies that take actions to control GHG emissions by reducing VMT will likely generate additional GHG reductions in the biological carbon pool. By modeling various scenarios, they will be able to estimate and take full credit for these additional GHG benefits." Please clarify if "Agencies" mean MPOs. Please provide a definition on the biological carbon pool in the Glossary. Please revise the statement to read: "Agencies MPOs that take actions to control GHG emissions by reducing VMT per capita (e.g., person, employee, or other appropriate unit) will likely generate additional GHG reductions such as in the biological carbon pool (See glossary for a definition of “biological carbon pool”), and will be able to take full credit for these additional GHG benefits. By modeling various scenarios, they will be able to estimate and take full credit for these additional GHG benefits.</p>

2016 Second Draft California Metropolitan Planning Organization Regional Transportation Plan Guidelines Comments

#	Chapter/ Appendix	Section	Page	Comment
11	Chapter 5	5.5	124	The RTP is a long-range plan about transportation infrastructure projects, not equipment; therefore, it does not seem appropriate for the RTP to discuss the public health impact association of the operations of on-highway, nonroad, marine and locomotive equipment. Also, we suggest revising the following statement as follows to include the text in bold: "In addition, RTPs can also identify how the transportation network has been designed to accommodate, and promote, new technology, alternative fuels, charging stations, zero-emission technology, and emerging technology such as automated vehicles ; include a discussion about incentives and implementation of these measures; and, identify how the proposed transportation network is meeting the goals and objectives of the State's Zero Emission Vehicle Action Plan."
12	Appendix L	N/A	314	Update safety statistics with 2014 OTS SWITRS data.
13	Appendix L	N/A	314	Remove the 10 at the end of this sentence. "Auto emissions impact air quality and contribute to impaired lung development, lung cancer, asthma and other chronic respiratory problems, and heart disease.10"
14	Appendix L	N/A	320	Regarding the following statement: "To address public health more broadly in its planning process, SCAG has established a Public Health Subcommittee, a Public Health Workgroup, and is developing a Public Health Work Plan:" The word "developing" should be revised to "developed."
15	Appendix L	N/A	326	The Safe Routes To Schools portion here seems pretty duplicative of the section on page 321.