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October 14, 2016

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

RE: September 2016 Draft Regional Transportation Plan Guidelines for MPOs

Dear Ms. Martinez-Velez:

Thank you for the opportunity to comment on the proposed changes to the Regional Transportation Plan (RTP) Guidelines for Metropolitan Planning Organizations (MPOs), which were released on September 21, 2016, for public review.

Previous versions of the RTP Guidelines have directly informed the Metropolitan Transportation Commission's (MTC's) regional transportation plans, including most recently *Plan Bay Area* adopted in 2013.

As you know, over the years, as the scope of the RTPs in California has expanded – which must now meet multiple regulatory requirements and legislative priorities – so has the complexity of putting together feasible and implementable regional plans.

At the same time, many MPOs including MTC have gone well beyond the statutory requirements in developing regional plans in response to local priorities and evolving mega-regional, national and global trends that affect transportation plans and policies. There is also a much broader understanding than ever before of the effect of transportation investments on public health, housing affordability, regional economic competitiveness and global climate change.

In this context and as further detailed in Attachment A, it is imperative that the California Transportation Commission (CTC) distinguish between the following as it finalizes the RTP guidelines:

- Regulatory and legal requirements (the "shalls" – including the checklist);
- Recommendations set by CTC, if any (the "shoulds" and "considerations");
- Examples and case studies (including different approaches to addressing public health outcomes, middle-wage jobs and access to affordable housing);
- Helpful tools and resources (including research, data and best practices from regions in California as well as beyond); and,
- Continue working with the modeling group to revise and update Chapter 3.

In particular, MTC recommends the removal of the list of performance indicators that MPOs "should" create on page 136. Instead, the language could be revised to state that "MPOs should identify a set of indicators to assess the performance of the RTP, which may include measures of mobility, congestion, health, environmental quality, maintenance, mode shares, safety, reliability, security, equity, and accessibility." Similarly, on page 202, the text listing specific performance measures MPOs "should" include is not needed and should be deleted – alternatively, these topic areas could be listed as examples on the subsequent pages. Our state is diverse, with different issues being faced by different metro regions and flexibility is therefore beneficial.

Making these distinctions explicit in the guidelines will set realistic expectations among key stakeholders such as business, labor, environmental and community groups who are directly involved in the update process, and prevent legal challenges or other opposition to adopted RTPs due to misinterpretation of the intent.

MTC appreciates CTC's iterative and inclusive approach to updating these guidelines. If you have any questions about this letter or the enclosed attachment, please contact Adam Noelting at (415) 778-5366.

Sincerely,

Steve Heminger
Executive Director

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/Volumes/J_Drive/PROJECT/RTP Guidelines/2016 Update/Cover Letter+AttachmentA_RTP Guidelines.docx

Enclosed: Attachment A

Attachment A

MTC Comments on the September 2016 Draft Regional Transportation Plan Guidelines for MPOs

CHAPTER 1

Page(s) / Section(s)	Comment(s)
	No comments at this time.

CHAPTER 2

Page(s) / Section(s)	Comment(s)
26 / 2.2, SB 32	The write up on SB 32 (newly-passed) is quite brief. We recommend this section be expanded to clarify the MPO impacts, if any.
30-32 / 2.3 Promoting Public Health and Health Equity	We recommend moving Section 2.3 to later in the chapter.

CHAPTER 3

Page(s) / Section(s)	Comment(s)
	We recommend CTC/Caltrans continue working with the modeling group on this chapter.

CHAPTER 4

Page(s) / Section(s)	Comment(s)
98 / 4.3 Social Equity Factors	The last section on Page 98 which suggests that "*ideally*, MPOs could also prioritize transportation projects that recruit, train, and/or hire individuals with barriers to employment . . ." should be moved to a best practice in Appendix M.
99 / 4.3 Social Equity Factors	We recommend moving the best practices out of section 4.3 and adding it alongside the other best practices in Appendix M . Including it within the body of the section sets the expectation that this is a required or recommended component of RTPs.

CHAPTER 5

Page(s) / Section(s)	Comment
	No comments at this time.

CHAPTER 6

Page(s) / Section(s)	Comment
136 / 6.1, The Policy Element	The guidelines make it clear the list of performance indicators that MPOs "should" create are not authorized in law. We recommend the removal of the list of performance indicators that MPOs "should" create on page 136. Instead, the language could be revised to state that "MPOs should identify a set of indicators to assess the performance of the RTP, which may include measures of mobility, congestion, health, environmental quality, maintenance, mode shares, safety, reliability, security, equity, and accessibility." The list A-J should be deleted.
147-161 / Modal Discussion, 6.8-6.13	The modal discussion section reflects a siloed approach to transportation funding, which is contrary to the multimodal approach we take in developing our RTP.
147, 153, 170	The electrification law is a state requirement that is now listed as 4 of the 12 highway related components that should be addressed on page 147. We recommend you scale this back to reflect its relative importance to other mobility, maintenance, etc. issues on road network. Similar comment on page 153 with regards to goods movement revisions. Similar comment on page 170 with regards to new section on Transportation Electrification.

171 / 6.20, Transportation Safety	We recommend moving the federal safety performance measure section to Chapter 7 performance, and include placeholders for future federal performance measure requirements in that chapter instead
178 / 6.26, Visualization and Mapping	We recommend the discussion of Urban Footprint and other tools be moved to an examples, best practices or other section that discusses available tools.

CHAPTER 7

Page(s) / Section(s)	Comment
202	The new text on page 202 saying that MPOs shall include federal measures and others that are regionally useful is relevant and beneficial. The text listing specific performance measures MPOs "should" include is not needed and should be deleted – alternatively, these topic areas could be listed as examples (pages 202 and 203). Our state is diverse, with different issues being faced by different metro regions and flexibility is therefore beneficial.
Overall	As noted above, move the safety measure requirements here, add the newly approved transit state of good repair (SGR) performance measures as well, and then include a placeholder for future federally-required performance measures in later amendments to the guidelines.
Overall	Reorganize Chapter 7 into Federal Requirements, State Requirements (i.e., SB 375 GHG target), and Other/Example Planning Practices sections. Only "shalls" should be listed under the first two sections in order to clarify what is required versus what is recommended for consideration.
Overall	Limit Chapter 7 to the performance measures currently required under federal and state law, then encourage MPOs to go beyond in selecting performance measures that support state/federal goals while providing flexibility the diverse metro areas of California. State measures and target processes should go through a rigorous prioritization and review on model/data availability before including in a list. CTC could cite FHWA or NCHRP/TCRP guidebooks with performance measure dictionaries as reference.

APPENDICES

Page(s) / Section(s)	Comment
294 / Appendix I	We strongly recommend adding "transit" along with "roads" under bullet 8 which recommends prioritizing "fix it first" policies.
Appendix L	We strongly recommend adding references and citations throughout the chapter. In the introduction section, acknowledge that there are a number of factors that affect health outcomes including, household income, genetics, physical environment and nutrition. In the public health and RTP section, acknowledge that many communities are already built out, making it more challenging to retrofit suburban neighborhoods into pedestrian- and bike-friendly. Also, clarify that GHG reduction strategies that rely on increasing physical activity provide significant health co-benefits, compared to the adoption of clean vehicles and fuels alone. In the indirect effects section, clarify that seniors and people with disabilities are also affected, and that the biggest share of household income is spent on housing, not transportation.
316 / Appendix L	We recommend citing peer-reviewed scientific research instead of TransForm's 2012 report.
329 / Appendix L	We strongly recommend limiting the discussion on C-PHAM to a description of the tool itself. Clarify that MPOs in the Bay Area and San Diego are NOT using C-PHAM (it is currently not entirely clear that this is the case). Delete the suggestion to use this tool for allocating ATP and AHSC funding. Again, this section should

	just describe the tool.
339 / Appendix L	We strongly recommend editing the first paragraph under section 6.1 that suggests that, "public health performance measures must be easily obtainable and measurable, such as those provided by the California Health Interview Survey (CHIS)." MPOs do not have direct access to CHIS data. The MPOs also do not have the expertise to interpret and summarize this data, which has many limitations. Lastly, MPOs use a wide range of data sources to summarize health outcomes, and deploy a wide range of modeling tools to estimate the impacts on health outcomes in the horizon year. The specific reference to CHIS data is misleading and confusing.
343 / Appendix L	We recommend deleting the text under section 6.16 since it does not relate at all to the heading, "Transportation Projects Exempted from Senate Bill 375."