

# Transportation Solutions Defense and Education Fund

P.O. Box 151439 San Rafael, CA 94915 415-331-1982

October 14, 2016  
By E-Mail to  
RTP.Guidelines.  
Update@dot.ca.gov

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

Re: Second Draft of 2016 MPO RTP Guidelines

Dear Ms. Martinez-Velez :

The Transportation Solutions Defense and Education Fund, TRANSDEF, is an environmental non-profit focused on reducing the climate impacts of transportation. TRANSDEF participated in the last two rounds of Guidelines Updates and the First Draft of this third round, and was very involved in the editorial process. The release of the Second Draft occurred while we were on vacation. Our comments are necessarily abbreviated.

The decision to not use the Move tracking graphics of Word's Track Changes has made it impossible to make sure that critical text was retained in this Second Draft. Review is thus unnecessarily made more difficult and chaotic. We were further puzzled by the blank cells in the comment log in response to most of our comments. What is the intended meaning conveyed by a blue square? There was no key.

## Induced Demand

We were alarmed to find a notation in the comment log (p. 40) that the references to induced demand ("roadway capacity increase tends to cause increases in VMT and GHGs") were deleted "at the request of various stakeholders." After searching the log, we were unable to uncover any request for removal. At most, OCTA requested a modification, and other commenters suggested additions. While we had commented on a grammatical mistake in the subject text in the last draft, we were very appreciative of its inclusion, due to its central importance in VMT reduction:

4. We highly commend the Draft Guidelines for referring to induced demand. This one concept is the very heart of the transformation of transportation policy. We must point out, however, that the significance of induced demand has not been recognized in policy. California is still officially

committed to increasing capacity as a transportation solution. CTP 2040 stopped short of recommending the avoidance of capacity increases. Interestingly, the NEPA Guidance that was just released calls for the quantification of indirect sources of GHGs, including roadway widening and fossil fuel production.

The Second Draft is a giant step backwards in candid transportation policy. Because of the apparent lack of transparency in the comment log dealing with this highly sensitive edit, TRANSDEF demands that a memo providing the details (who, what, when and why) of the decisions made on this very politicized subject be sent to stakeholders.

#### SB 375 Exemptions

It is unclear to TRANSDEF what purpose is served by reinserting Section 6.16. It had appeared to us that this section was now obsolete.

#### The Following Items In Our Second Comment Letter Were Seemingly Ignored

29: While the Guidelines state "Each RTIP should be based on the regional transportation plan and a region wide assessment of transportation needs and deficiencies" in actual fact, RTIPs are often biased towards funding highway projects. We suggest the inclusion of a recommended practice: "Calculate the share of funding being committed to each travel mode in the proposed TIP, and compare that with the shares in the adopted RTP. This is a test of the degree to which an SCS is being implemented." A divergence will indicate that the agency's funding priorities front-load the highway side, leaving the rest of the RTP as essentially window dressing. This test is critical in evaluating an agency's commitment to a multimodal future. A large divergence will indicate the likely failure of a multimodal strategy, due to it not being implemented.

99: We were unable to find any material in the Guidelines pertaining to the submission of project lists by counties to the MPO. This is the critical step, because if the County lists have been composed without any consideration of regional goals, those goals are unlikely to be met. Please provide MPOs with guidance for evaluating county submissions for consistency with RTP goals. It would be very helpful if the Guidelines were to resolve once and for all the debate over whether counties have a responsibility under CEQA to treat their countywide transportation plans in the same manner as General Plans, namely to do a Program EIR.

124: Please request OPR to issue guidance suggesting that the ARB-calculated 5.5% increase in VMT before 2030 (see p. 4) be considered as a candidate threshold of significance for evaluating GHG emissions in an RTP. [This information was deleted from the Second Draft, even though it is the only calculation we've seen that is useful for planners. We suggest it should be added back in to the Guidelines.]

140: Because over half of MPO revenues come from local sales taxes, it is imperative that the Guidelines explicitly address whether future tax renewals can be considered "reasonably expected." Also, MPOs have started identifying future windfall money as "reasonably expected" based on their history of having received such funds. Please address whether this is proper.

TRANSDEF appreciates this opportunity to assist with the development of the RTP Guidelines, an essential resource for transportation professionals. We wish it would be possible to do more, but time does not allow that.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,  
President