

Transportation Solutions Defense and Education Fund

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August 3, 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: Draft 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 was very involved in the editorial process. We present our editorial suggestions in this letter, leaving the substantive comments to a separate letter. These comments are each keyed to the respective page number.

Structural Suggestions

48: Instead of listing all the RTP requirements in one dense clump, how about extracting a phrase from each, and compiling a bulleted list with references to Guidelines page numbers? Turn it essentially into a checklist or Table of Requirements. e.g.,

20-year planning horizon x page

Most recent planning assumptions y page

59: There is a great deal of repetition in the update to Chapter 3. For example, the Interagency Consultation paragraph is a duplicate of the first bullet on p. 53. The last bullet on p. 61 is nearly identical with the 6th bullet on p. 62. With so many requirements to study, the process of taking them all in is harmed by running across them multiple times. Repetitions should be deleted. Select an unusual word in each paragraph and search for it to find repetitions.

61: The heading RTP Modeling Improvement Program does not apply to the requirements for modeling groups listed in this section. We suggest you create a separate section with that heading, and move the appropriate material into in. The requirements can return to being titled "RTP Modeling."

61: The concept of cumulative requirements seems to have gotten lost in the update process. For example, the last two bullets on p. 62 are repeated as the twelfth bullet on p. 63 and the tenth bullet on p. 64.

68-71: These pages have the same problem as was found on p. 48 (described above). The text is impenetrable. No one will learn from this section, as it is indigestible. In addition, it merely repeats the contents of the rest of the Guidelines. It is unclear what purpose it is intended to serve. To the extent that it is useful to divide up the requirements between the different MPO groups, then the suggestion above for p. 48 applies here, too.

Formatting Suggestions

61-65: The headings for the different MPO groupings are essentially invisible, even though they are bold. The bullet points are not readily distinguishable from the substantive bullet points. They need to have a higher hierarchy level as headings. I suggesting making each one a bold lettered heading.

Proofreading and Copy Editing Suggestions

4: Change "required an update in CEQA transportation metric towards alignment with climate and planning goals." to "required an update in CEQA transportation metrics to align with climate and planning goals."

4: Add comma: "As a result of state legislation and executive orders, GHG emission reduction has become one of the key priorities in the statewide and regional transportation planning process, in addition to improving transportation mobility, addressing federal air quality criteria pollutants and ensuring that the statewide regional transportation system addresses tribal, local, regional, and statewide mobility and economic needs."

4: Change "Numerous studies show that investments in roadway capacity increase tend to cause increases in VMT and GHGs," to "Numerous studies show that investments in roadway capacity increase tend to cause increases in VMT and GHGs."

9: Establish context: "The 2016 RTP Guidelines update was prepared..."

27: Please break up the very long paragraph, starting new paragraphs at "As some health advocates have said..." and at "The design of the transportation system..."

47: Delete RTPA references.

47: Change "...in large part depend on ..." to "...in large part dependent on ..."

47: Change "The impacts are reported as performance measures..." to "The impacts are evaluated according to performance measures..."

48: Delete the second "used": "Regional transportation plan analysis is also used as a policy tool ~~used~~ to test..."

50: Change this: "~~Regional Travel Demand Modeling consistency and quality control is tool used to determine a regions air quality conformity status and to effectively implementing SCSs. The conformity 40 CFR 93.105 requires that an interagency consultation process involving MPOs, State and local air quality planning agencies, State and local transportation agencies, EPA, and the USDOT for the following:~~" to this: "~~Regional Travel Demand Modeling-consistency and quality control~~ is a tool used to determine a region's air quality conformity status and to effectively implementing SCSs. The conformity rule 40 CFR 93.105 requires ~~that~~ an interagency consultation process involving MPOs, State and local air quality planning agencies, State and local transportation agencies, EPA, and the USDOT for the following:"

51: Change this: "~~Model input assumptions are necessary part of running a transportation demand modeling and determining it the MPO will meet air quality conformity or its GHG emissions reductions targets. Assumptions must be derived from the estimates of current and future population, employment, travel, and congestion most recently developed by the MPO or other agency authorized to make such estimates and approved by the MPO.~~" to this: "~~Model input assumptions are a necessary part of running a transportation demand modeling and determining it if the MPO will meet air quality conformity or its GHG emissions reductions targets. Assumptions must be derived from the estimates of current and future population, employment, travel, and congestion most recently developed by the MPO, or other agency authorized to make such estimates and approved by the MPO.~~"

51: Change this: "~~The results of the review of the planning assumptions and consultation process would evaluating and choosing assumptions that are be documented in the conformity determination.~~" to this: "~~The results of the review of the planning assumptions and consultation process would evaluating evaluate and choose choosing~~ assumptions that are be documented in the conformity determination."

51: Shift this to the RTPA Guidelines: "~~The interagency consultation process is also the forum for used in conformity determinations in isolated rural nonattainment and maintenance areas (40 CFR 93.105(c)(1)(vi)).~~"

51: Don't the bullet points belong under a Recommendations section, as a "should"? Also, these bullet points repeat what was stated in bullet points on the previous page. Maybe the p. 50 bullet points should be deleted as redundant.

51: Note the apparent footnote 6 in the third lower bullet.

52: Delete the space in "post- processing..."

53: Change "date" to "data" in the second bullet.

53: Insert "to" before "use" in the seventh bullet.

53: Use the plural of "source" in the next-to-last bullet.

50-53: Please review these pages for repetitions and delete redundant material.

54: Insert a comma and a "the" before the first use of "MPO" in the first bullet. Insert a "the" before the other use of "MPO" in the first bullet.

54: Change this: "...regional transportation agencies are encouraged consider ways to incorporated them..." to this "...regional transportation agencies are encouraged to consider ways to ~~incorporated~~ incorporate them..."

55: Delete the first use of "*For additional guidance see,*"

56: Insert "their" before "roadway network". Note that this paragraph is repeated on p. 61.

56: Change the second bullet from this: "MPOs shall have minimum three trip purposes..." to this "MPOs shall have a minimum of three trip purposes..." Insert spaces before (HBS) and (HBU).

57: Delete the space in "count- based."

59: Insert "the" before the first use of SCS.

60: Insert "to" before "review" in " expert peer advisory teams review"

60: Change this: "...supported by the scientist literature and relevant case studies, where feasible and supported by data, the list should include elasticities associated with BMP." to this: "...supported by the ~~scientist~~ scientific literature and relevant case studies. Where feasible and supported by data, the list should include elasticities associated with BMPs."

60: We are unable to translate this into English: "Minimally, ARB is encouraged work with the land use and transportation technical experts to identify a range or general scale of the possible GHG benefits of the policies and practices identified in the BMP list."

61: Pluralize "consist" on the first line.

61: Change the comma to an apostrophe in "SB 375, SCS analysis."

61: Insert "a" before "different" in the last bullet.

63: Change this: "Vehicle ownership model shall be developed and used. Vehicle ownership model is critical to determine..." to this: "A vehicle ownership model shall be developed and used. A vehicle ownership model is critical ~~to determine~~ in determining..."

68: Change this: "Transportation planning agency designed under..." to this: "Transportation planning ~~agency designed~~ agencies designated under..."

68: Change this: "...are required prepare and adopted a RTP that consider factors ..." to this: "...are required to prepare and ~~adopted~~ adopt an RTP that considers factors..."

68: Change this: "...agencies other thank those..." to this: "...agencies other ~~thank~~ than those..."

68: Delete the extra "o" between "development of."

68: Verify that there are still triennial RTPs.

68: Change this: "... as part the public..." to this: "... as part of the public..."

69: Change this: "... base their updates the latest..." to this: "... base their updates on the latest..."

69: Insert an apostrophe in the last two uses of "plans" in the first paragraph.

121: Please break up the very long paragraph, starting new paragraphs at "Eco-logical..." and "In addition, ..."

136: Because Section 6.16 has been deleted due to obsolescence, the last sentence in the first paragraph should be deleted.

143: Please fix this sentence: "MAP-21/FAST establish limitations on federal funding flexibility if the aggregate bridge condition in California does not meet certain minimum conditions for National Highway System (NHS) bridges. MPOs shall monitor the current structurally deficient bridge deck area and make the necessary investment decisions that result in less than 10% of the agencies' NHS bridge deck area." At a minimum, insert at the end: "being structurally deficient."

145: Change "7. Consider CTP policy suggesting to invest strategically to optimize performance; and 8. Consider CTP policy suggesting for the application of sustainable preventative maintenance and rehabilitation strategies." to: "7. Consider CTP policy suggesting strategic investing to optimize performance; and 8. Consider CTP policy suggesting for the application of sustainable preventative maintenance and rehabilitation strategies."

148: Put a hyphen in "freight-related strategies."

149: The section on the FAST Act contains no recommendations. It should be given its own heading.

149: "Centerlines" should not be plural.

150: "May 2016" should not be all caps.

151: Change "who's" to "whose."

151: Delete the period: "Federal laws (Title 23 CFR Part 450.324(g) and. Title 23 CFR Part 450.316(a) (1))"

152: Move the "**Military Airfields and Installations**" heading to the next page.

153: Change "and sea leave rise." to "and sea level rise."

153: The recommendation for RTPAs is probably intended to be for MPOs.

154: Are the underlinings in the bullet points intentional? They appear random.

157: Transit includes rail. It is redundant to write "transit and rail."

165: The Guidelines are intended to be comprehensive, containing all the relevant requirements. Because the Guidelines reference Attachment 1, the document would be

more helpful if Attachment 1 was made into an appendix.

169: Note the underlined phrase: "The RTP should include by corridor all strategies, actions and improvements identified in the adopted TCR or CSMP that are needed to restore capacity and describe how the corridor will be managed across jurisdictions and modes to improve corridor performance based upon performance measurement." This is an artifact from the previous versions' focus on congestion, and needs to be modified similar to the changes on p. 36.

187: This paragraph has run-on sentences: "The Safeguarding California Plan builds on the foundation of the CAS by identifying progress made on reducing emissions and addressing vulnerabilities, a review of new studies and policies, and specific actions needed to prepare for climate risks to the transportation sector. Some of these actions include research into new technology, climate science, and geophysics that could impact the transportation system, policies to improve planning and design for climate change adaptation, and an improved platform for sharing information." Better would be: "The Safeguarding California Plan builds on the foundation of the CAS by identifying progress made on reducing emissions and addressing vulnerabilities. It includes a review of new studies and policies, and specific actions needed to prepare for climate risks to the transportation sector. ~~Some of these actions include~~ Research is needed into new technology, climate science, and geophysics that could impact the transportation system. Also needed are policies to improve planning and design for climate change adaptation, and an improved platform for sharing information."

TRANSDEF appreciates this opportunity to assist with the development of the RTP Guidelines, an essential resource for transportation professionals.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President

Transportation Solutions Defense and Education Fund

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August 3, 2016
By E-Mail to
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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 was very involved in the editorial process. A separate letter of ours provides editorial suggestions.

TRANSDEF is very pleased at the changes proposed by the Draft MPO RTP Guidelines. They clearly articulate how climate change considerations need to be part of the regional planning process. They constitute excellent multimodal planning, with a fascinating historical twist: The redline version clearly documents the cultural change now in progress in the transportation world, in which the focus is shifting from congestion to GHG emissions. All this is very good.

However, not all is well in transportation in California. Transportation policy and practice at the local level are totally disconnected from policy at the state level, as ably represented by the draft RTP Guidelines. It must be recognized that due to gaps in legislation, the RTP Guidelines have no effect on metropolitan counties. Locals could care less what the Guidelines say. Because local plans feed into RTPs, RTPs are certain to result in VMT increases beyond the 5.5% calculated by ARB to be the maximum while still achieving the Executive Order targets. (p. 4.)

While not properly an issue for the RTP Guidelines, we feel that unless there is acknowledgement of this disconnect, comprehensive state policy cannot move forward. We think the Guidelines should accurately reflect the current state of affairs. That's why we present the following real-world comments, keyed to Guidelines page numbers.

Substantive Comments

4. CTP 2040 is not a set of recommendations leading to achievement of the Governor's 2050 GHG emissions reduction target. While it did contain a scenario that demonstrated how the State could get to the target, the Plan then went to great lengths to disconnect itself from that scenario. That makes the second half of this sentence grossly misleading. The CTP does not address the perils of climate change. It merely discusses what would have to be done if the State were to get serious about reducing the GHG emissions from its largest source category, motor vehicles:

And more recently, in 2015, Governor Brown issued Executive Order B-30-15 establishing a California GHG reduction target of 40 percent below 1990 levels by 2050 which is being addressed through the development of the statewide long-range transportation plan, the California Transportation Plan (CTP) 2040.

4. The principles identified for guiding planning and investment are being totally ignored by counties in their RTP submissions and their sales tax expenditure plans. Again, this is a legislative gap, but it must be noted here. Because RTPs are based on county submissions, there is no way that RTPs can follow these principles either.

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.

5. The mandate of SB 391 is described in the text as:

The bill requires the California Transportation Plan (CTP) to address how the state will achieve maximum feasible emissions reductions in order to attain a statewide reduction of greenhouse gas emissions to 1990 levels by 2020 and 80% below 1990 levels by 2050.

This is incomplete. The other section of the law is actually far stronger:

65072. The California Transportation Plan shall include all of the following: (a) A policy element that describes the state's transportation policies and system performance objectives. These policies and objectives shall be consistent with legislative intent described in Sections 14000, 14000.5, 14000.6, and 65088. (emphasis added.)

It is this section that sets up the climate change policy element (14000.6) as a key driver of the rest of the CTP. Because of it, it must be concluded that the CTP failed to meet the requirements of SB 391.

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.

134: "In addition, the RTP should identify the criteria that the MPO used to select the transportation projects on the constrained and unconstrained project lists." Please be aware that in transportation, having a project selected is traditionally seen as a political prize. The only criteria typically used are political, and are completely unconnected to policy. It would thus be quite awkward to be candid about criteria.

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.

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Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,
President