

DRAFT 2016 Regional Transportation Plan Guidelines for Regional Transportation Planning Agencies - Comments Log

Organization	Chapter	Ch. Page	Comment
Association of Monterey Bay Area of Governments	NA	NA	<p>AMBAG has the following comments and concerns regarding the 2016 Draft California RTPA RTP Guidelines:</p> <ol style="list-style-type: none"> 1. AMBAG supports the separation of the MPO and RTPA RTP guidelines. 2. The guidelines structure needs to identify specific mandates from statute as “shalls” and potential best practices as “shoulds” throughout the RTP Guidelines. 3. Best practices should not be included as a baseline of what is required, but instead provide representative examples from small and large RTPAs of excellent planning work that other MPO can emulate. This is particularly important as it relates to modeling analyses and social equity/environmental justice analyses. 4. AMBAG believes it is premature to include requirements for SB 743 as the guidance for this has not been finalized by OPR.
Association of Monterey Bay Area of Governments	2.2	NA	The comment that transportation represents half of GHG emissions is misleading.
Association of Monterey Bay Area of Governments	2.3	NA	Paragraph 3 - Data/evidence to support such broad statements and conclusions is needed regarding the link between access and overall public health.
Association of Monterey Bay Area of Governments	3	NA	The entire modeling chapter has become too prescriptive and needs to be revised to include statute requirements and recommendations.
Association of Monterey Bay Area of Governments	3	NA	<p>AMBAG has the following comments and concerns regarding the 2016 Draft California RTPA RTP Guidelines:</p> <p>Chapter 3 (Modeling) needs to be revised to address what is required by statute (shall) and recommendations (should). Many of the “shalls” included in this section are not required by statute and they need to be identified as recommendations instead. This chapter needs to also include a discussion of the different types of modeling tools and resources used across the various California MPOs and RTPAs. Previously, this chapter had requirements and recommendations that were based on statute and what was reasonable given the capacity for small and large sized MPOs/RTPAs. The changes to this chapter have dramatically increased the modeling requirements for RTPs which would have a huge cost and resources impact that smaller MPOs/RTPAs do not have the resources to meet. Additionally, many of the RTPAs do not have modeling capabilities and often use consultant services or the MPOs for modeling needs.</p>
Association of Monterey Bay Area of Governments	5.5	NA	Need to clearly define and detail what data is sufficient to conclude that RTP has no effect on climate change and what statute this requirement is from.
Association of Monterey Bay Area of Governments	6.11	NA	Need to reference California Freight Mobility Plan
Association of Monterey Bay Area of Governments	6.13	NA	Need to define “low stress” trips.
El Dorado County Community Development Agency	NA	NA	<ol style="list-style-type: none"> 1) The Guidelines should be edited for spelling, grammatical errors and punctuation 2) RTPA's have no land use authority; any reference to land use policies need to clearly state that the ultimate land use authority is the local jurisdiction

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El Dorado County Community Development Agency	1	4	<p>General Comments: 1) The Guidelines should be edited for spelling, grammatical errors and punctuation 2) RTPA's have no land use authority; any reference to land use policies need to clearly state that the ultimate land use authority is the local jurisdiction</p> <p>Specific Comments: Third full paragraph: first sentence should be edited as follows: The Regional Transportation Plan (RTP), also called a Metropolitan Transportation Plan (MTP)- or Long-Range Transportation Plan is the mechanism used in California by both for Metropolitan Planning Organizations (MPOs) and Regional Transportation Planning Agencies (RTPAs) to conduct long-range (minimum of 20 years)-integrated land use and transportation planning in conjunction with local jurisdiction land use planning in their regions to achieve and identify transportation network investments and policies which will promote regional and state goals</p>
El Dorado County Community Development Agency	1	7	<p>Specific Comments: Section 14522.1: this should not be included as this is specifically for MPOs</p>
El Dorado County Community Development Agency	1	8	<p>Specific Comments: second paragraph: for consistency with the MPO guidelines, revise sentence to include 2010 revisions to the RTP Guidelines</p>
El Dorado County Community Development Agency	1	14	<p>Specific Comments: <u>Anticipated Future Change to Transportation Analysis</u>: add to the second sentence, "for transit priority areas" see comment page 17</p>
El Dorado County Community Development Agency	1.1	17	<p>Specific Comments: Item #2: add to the end of the sentence "for transit priority areas". SB 743 only says (emphasis added) "may adopt guidelines, pursuant to Section 21083 establishing alternative metrics to the metrics used for traffic levels of service for transportation impacts outside transit priority areas." the key word is MAY.</p>
El Dorado County Community Development Agency	2.2	22	<p>Specific Comments: Background on Climate Change Legislation, second paragraph: 37% is not approximately half; it is closer to a third. Revise to say one-third</p>
El Dorado County Community Development Agency	2	30	<p>Specific Comments: Complete Streets, first line: "construction" should be inserted before operated</p>
El Dorado County Community Development Agency	2	34	<p>Specific Comments: Corridor System Management Planning (CSMP): El Dorado County does not agree with potations of the current CSMP for US 50. Engaging the local jurisdictions must be done to ensure proper coordination. Engagement or partnership means actively soliciting comments or input from local jurisdictions and actually taking into consideration their comments and concerns during the draft phase up through completion of the final document. This is not always done in our experience.</p>

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El Dorado County Community Development Agency	2	52	<p>General Comments:</p> <p>1) The Guidelines should be edited for spelling, grammatical errors and punctuation</p> <p>2) RTPA's have no land use authority; any reference to land use policies need to clearly state that the ultimate land use authority is the local jurisdiction</p> <p>3) This chapter should be revised to eliminate references to MPOs, SCSs, and other regulations that do not apply to the RTPAs.</p> <p>4) We respectfully disagree with comments made at the July 13, 2016 RTP Guidelines Workshop that stated the RTP Guidelines should focus only on how the guidelines affect the development of RTP's. The RTP Guidelines , specifically the Modeling chapter, are regularly used as the benchmark for development of regional/local agency's models. Additionally, transportation planners/engineers refer to the RTP Guidelines for guidance on any sub-areas validation that is performed for development-driven or infrastructure projects. We request that this audience and application is kept in mind when drafting language for the RTP Guidelines.</p> <p>Specific Comments:</p> <p>The text states "Every component of a model must be validated as well as the entire model system". The term 'component' is rather vague. This language could be referring to modes, time frames, inputs or outputs, geographical regions, roadway classification, etc. We suggest inserting more specific language.</p>
El Dorado County Community Development Agency	2	53	<p>Specific Comments:</p> <p>Static Validation Criteria and Thresholds Table - We request that the model validation criteria and a brief explanation of the process used to review/develop the criteria be provided in the next round of a draft guidelines, so that stakeholders have an opportunity to review and comment on any proposed changes to the validation criteria.</p>
El Dorado County Community Development Agency	2	53	<p>Specific Comments:</p> <p>"The VMT by facility type and by county should be compared against the observed data (e.g. HPMS or observed data)" - VMT cannot be measured today, VMT can only be estimated through statistical analysis. This statement should be revised to reflect that.</p>
El Dorado County Community Development Agency	2	58	<p>Specific Comments:</p> <p>bullet 4 under "Best Practices" - change the word "from" to "since"</p>
El Dorado County Community Development Agency	2	58	<p>Specific Comments:</p> <p>bullet 6 under "Best Practices" is a repeat of the paragraph under the "Model Peer Review/Peer Advisory Committee"</p>
El Dorado County Community Development Agency	3	58	<p>Best Management Practices - this section seems misplaced. It does not have anything to do with modeling. Perhaps move to a different chapter?</p>
El Dorado County Community Development Agency	3	59	<p>second bullet under "Travel Demand Models" - the limits presented are not reasonable for rural areas. TAZ's representing rural areas may have a population of 200 and cover 20 square miles. We would suggest revising this guidance to accommodate models for rural areas. Perhaps it would be most effective to only reference the upper limit on the daily trips (i.e. a TAZ "should not generate more than 15,000 person trips per day")</p>

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El Dorado County Community Development Agency	3	60	bullet 3 - Auto operating costs are only an important input if there are other modes readily available. In rural areas, where biking, walking, and or taking transit to your destination is often infeasible, auto operating costs do not affect travel. Auto ownership should be factored in, but that is already discussed in other areas of this chapter. We recommend changing this "shall" to a "should"
El Dorado County Community Development Agency	3	60	bullet 6, 10, and 13 are repeated paragraphs. They should be deleted. Same comment with the first bullet on Page 63
El Dorado County Community Development Agency	4	97	Specific Comments: The second paragraph discussion of the agencies and entities with legal standing should be incorporated into the first paragraph discussion. RTPA's cannot project future land use without the agencies and entities that actually have the authority to do so.
El Dorado County Community Development Agency	5	115	Specific Comments: fourth paragraph, second sentence add the following to the end of the sentence, " in transit priority areas " SB 743 only says (emphasis added) " may adopt guidelines, pursuant to Section 21083 establishing alternative metrics to the metrics used for traffic levels of service for transportation impacts outside transit priority areas." The key word is MAY
El Dorado County Community Development Agency	5	124	Is there a reason the word Clean is crossed out in the first full sentence?
Nevada County Transportation Commission	1	NA	The Nevada County Transportation Commission (NCTC) supports the development of two separate sets of Regional Transportation Plan (RTP) Guidelines, one to address the additional RTP requirements of Metropolitan Planning Organizations (MPOs) and one to specifically address the different requirements of an RTP prepared by and Regional Transportation Planning Agency (RTPA). The purpose of the RTP Guidelines is to provide guidance for the RTPAs in the development of their RTPs addressing the federal and state requirements. This approach should produce a guidance document that is streamlined, straightforward, and useful to RTPAs. After reviewing the document NCTC suggests reorganizing the current chapters to make the document more useful in the following order: Chapter 1, Chapter 2, Chapter 6, Chapter 4, Chapter 5, and Chapter 3
Nevada County Transportation Commission	1	4	Page 4, fourth paragraph, first sentence, delete "...integrated land use and..." as this language is in reference to Sustainable Communities Strategies (SCS) prepared by MPOs.

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Nevada County Transportation Commission	1	4	<p>Page 4, the studies cited that link capacity increasing projects to increases in Vehicle Miles Traveled (VMT) linked to induced demand were in relation to congested urban highways. Review of available research reveals that adequate studies have not been conducted to quantify or validate the correlation of induced demand associated with capacity increasing projects on rural highways outside of congested urban areas. Each project and location is unique. When you look at the application of induced demand, in a rural county due to sparse geography and terrain, the travel patterns tend to be more established and static as compared to urban areas, and adding additional capacity to a roadway or highway in a rural area would not necessarily result in a large increase in VMT or trips being made on the new facility.</p> <p>Key corridors and principal arterials in rural areas generally are the most direct route between locations and parallel facilities often do not exist. It should also be noted that the current mode split for alternative modes of transportation in rural areas is generally low and the longer distances between destinations and terrain tend to limit bicycling and walking as viable alternatives to the automobile. Due to funding constraints, transit in rural areas, although it is available, is limited in its coverage and frequency and is not a convenient alternative to the automobile and is utilized by choice riders. Additional studies should be conducted in rural areas of the state, to determine the validity of induced demand associated with capacity increasing projects on rural highways outside of congested urban areas.</p>
Nevada County Transportation Commission	1	7, 8	Page 7 & 8, second paragraph on page 7, suggest the second sentence be revised to eliminate the reference to SB 375 and California Government Code Section 14522. Additionally, all of the following language in relation to 14522 and 14522.1, should be deleted as it is not a requirement related to RTPAs.
Nevada County Transportation Commission	1	10	Page 10, first paragraph, revise the following sentence to include "..., but it does look at how the implementation of the Sustainable Communities Strategy (SCS), prepared by Metropolitan Planning Organizations (MPOs) only, and Regional Transportation Plans prepared by RTPAs, will influence the statewide multimodal transportation system, as well as how the state will achieve maximum feasible emission reductions in order to meet AB 32 goals."
Nevada County Transportation Commission	1	15	Page 15, RTP Cycle Updates, second sentence, "A current RTP provides a comprehensive, 20 year plus vision of a balanced multimodal transportation system for the region." Suggest replacing the word "balanced" with "integrated".
Nevada County Transportation Commission	1	17	Page 17, delete "Other" from the title, should read "Key Additions to the 2016 RTP Guidelines".
Nevada County Transportation Commission	2	NA	The term "shall" and "should" in the RTP Guidelines, indicates an action that is either required or recommended in state or federal law. Whenever, the term "should" or "shall" is used in the RTP Guidelines it needs to include reference to the relevant Code of Federal Regulations or State statute and regulations. Caltrans should review any "new" additional RTP statements that include the "should" or "shall" terminology, and it should be verified that it is actually required or recommended in state and federal law and include the appropriate reference. Each section should end with the federal and state requirements, recommendations, and "Best Practices" and it should be noted if there are none that apply.
Nevada County Transportation Commission	2	30, 31, 32	Page 30, 31, 32, the section on Complete Streets description should be reduced. On page 31, verify that the "should" statements are recommend in state law and cite the reference. On page 32, under the Recommendation (Shoulds), State, delete the reference to Government Code 65040.2 that applies to General Plans and not to RTPAs. Additionally, RTPAs and local jurisdictions are already familiar with Complete Streets policies and practices and it seems that a page worth of links to best practices is not necessary.
Nevada County Transportation Commission	2	35	Page 35, Interregional Transportation Strategic Plan (ITSP), the lead in statement to the bulleted items below, states, "The RTP should:" and I do not believe the bulleted items are recommended as part of state law for RTPAs. Please verify and cite reference, revise, or delete. If these bullets are an MPO requirement only they should be deleted
Nevada County Transportation Commission	2	35	Page 35, the fourth bullet does not make sense without the removed text and should be deleted or modified.
Nevada County Transportation Commission	2	36	Page 36, requirements (Shalls), Federal, delete MPO requirement citation.
Nevada County Transportation Commission	2	40	Page 40, Conformity Considerations, this section should include an explanation following the numbered bullets that states that Isolated Rural Non-Attainment areas are not required to prepare a conformity determination on their RTP and conduct conformity analysis on regionally significant projects.

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Nevada County Transportation Commission	3	NA	In reviewing the RTPA RTP Guidelines Chapter 3 (Regional Transportation Plan Analysis and Modeling), it appears that the contents are exactly the same as what was included in the MPO RTP Guidelines and as a result it contains many references to MPO requirements that do not apply to RTPAs. If the intent is to have two separate RTP Guidelines for MPOs and RTPAs this Chapter needs to be revised to focus on the applicable RTPA requirements and recommendations. Most of the MPO requirement references should be deleted, although in some cases it may make sense to include some of the MPO recommendations in a section for "Best Practices". Also, the organization of the content in Chapter 3 for both the MPO and RTPA version could probably be re-organized to make the Chapter less confusing in relation to what is actually required.
Nevada County Transportation Commission	3	45	Page 45, first paragraph, first sentence, delete "...and for SB 375 Sustainable Community Strategy Implementation." Does not apply to RTPAs. Additionally, the second paragraph in relation to Sustainable Community Strategy
Nevada County Transportation Commission	3	46	Page 46, Section 3.3, this whole section needs to be reviewed and revised, as the whole section is related to MPO requirements. The language under the Regional Travel Demand Model (RTDM) also needs to be reviewed and revised, as RTPAs are not required to have RTDMs.
Nevada County Transportation Commission	3	47	Page 47, Visualization Technics and Sketch Modeling of Scenarios and Regional Economic & Land Use Models, these sections need to be reviewed and revised to only include applicable RTPA requirements and suggestions.
Nevada County Transportation Commission	3	48	Page 48, Section 3.4, the title of this section should be changed to "Air Quality Conformity", which is the main focus of the information. It would be helpful to include a general lead in statement that explains that counties designated as non-attainment for federal air quality standards are required to conduct transportation conformity on Regional Transportation Plans or in Isolated Rural Non-attainment areas on regionally significant projects. Also, under the fourth bullet delete the language in reference to SB 375 GHG emission reduction targets that do not apply to RTPAs.
Nevada County Transportation Commission	3	49	Page 49, Model Input Assumptions, revise the language to address RTPAs, also in the first sentence delete "or its GHG emission reduction targets".
Nevada County Transportation Commission	3	50	Page 50, review the language and revise to only include RTPA requirements. Delete the 8th, 10th, and 11th bullets that are not applicable to RTPAs.
Nevada County Transportation Commission	3	51	Page 51, review the language and revise to only include RTPA requirements.
Nevada County Transportation Commission	4	52	Page 52, review the language and revise to only include RTPA requirements. Also, verify that the bullets containing "should" are recommended in state law for RTPAs/MPOs.
Nevada County Transportation Commission	3	53	Page 53, the last two bullets should be deleted from the RTPA RTP Guidelines version. In the MPO RTP Guidelines version verify and cite the state and federal requirements for the same bullets containing "should" and "shall"
Nevada County Transportation Commission	3	54	Page 54, the discussion of the requirements for regional em1s10n analysis in metropolitan planning areas with an urbanized area population of over 200,000, and all of the associated bullets should be deleted from the RTPA RTP Guidelines.
Nevada County Transportation Commission	3	55	Page 55, in the last paragraph replace the two "MPO" references with RTPA.
Nevada County Transportation Commission	3	57	Page 57, delete the sections on Performance Indicators and Co-benefits of SCS that do not apply to RTPAs.
Nevada County Transportation Commission	3	58	Page 58, the first two bullets are related to MPO RTP requirements in relation to Transportation Management Areas and should be deleted. Also, under "Best Practices", the 3rd, 4th, and 5th bullets should be deleted.
Nevada County Transportation Commission	3	59	Page 59, Section 3.5, RTP Modeling "Improvement Program", this title should be changed to "Required and Recommended RTPA Modeling Practices". The title seems to be miss leading to call it an "Improvement Program". In the first paragraph, second sentence, I would recommend replacing "program of improvement" with "best practices". In the lead in sentence for the following bullets, delete "Improvement Program".
Nevada County Transportation Commission	3	60	Page 60, please verify and document the associated state or federal code sections related to the "shalls" and "shoulds". The 4th bullet on this page is the same as the 10th bullet; however the new language makes it a "shall" please list code section.
Nevada County Transportation Commission	3	101	Page 101, Please verify and document the associated state or federal code sections related to the "shalls" and "shoulds".
Humboldt County Association of Governments	NA	NA	Scanned 25 pages with grammatical corrections. Available upon request.

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Transportation Agency for Monterey County	NA	NA	In the Monterey Bay region, TAMC is one of the three RTPA's that work in collaboration with the Association of Monterey Bay Area Governments (AMBAG) as the regional Metropolitan Planning Organization. TAMC supports the separation of the MPO and RTPA RTP guidelines as this will provide greater clarity as to the specific roles and responsibilities of each organization
Transportation Agency for Monterey County	NA	NA	The RTP Guidelines should clearly distinguish between contents required by statute/regulation and those that are merely recommendation or best practices. The RTP checklist in Appendix C should be re-organized into separate lists of legal requirements ("shalls") and recommendations/best practices. Legal requirements should include a reference to applicable statute or regulatory authority. TAMC thinks that the word "should" in the text is too strong for optional or "best practice" items, because it implies an obligation or requirement. If something is not a legal requirement, it should be described as "recommended", "may include" or "might include" or "might consider including", rather than "should"
Transportation Agency for Monterey County	NA	NA	Incorporating elements of SB 743 has been noted as one of the bigger changes in the draft RTP Guidelines. TAMC believes it is premature to include requirements for SB 743 as the guidance for this has not been finalized. The guidelines should reflect the requirements of the statute and not an incomplete guideline/rulemaking process.
Transportation Agency for Monterey County	3.4	NA	The modeling chapter has become too prescriptive and needs to be revised to include statute requirements and recommendations. Section 3.4, RTDM Quality Control and Consistency, goes into significantly more depth than is needed for RTP Guidelines. Many aspects of the section are not relevant to developing RTPs. The RTP Guidelines should be limited to stating legal requirements and recommended best practices. TAMC suggests changes be made to have the most flexibility possible to account for regional differences and be able to develop plans that fit the unique characteristics of different regions across the state
Mendocino Council of Governments	1	3	Paragraph 1: Recognize that some agencies elected to update every 4 years for the benefit of RHNA coordination.
Mendocino Council of Governments	1	3	Paragraph 2: Use full name of these agencies. The few that are actually COGs can be identified by (COG) after the agency name.
Mendocino Council of Governments	1	7	Paragraph 5: Keep CGC 14522.1 in guidelines but preface it by identifying those RTPAs to which this applies: such as Placer, El Dorado, San Benito?
Mendocino Council of Governments	1	8	Paragraph 4: This needs revision. It refers to SAFETE-LU as the latest federal reauthorization bill.
Mendocino Council of Governments	1	8	Paragraph 6: Suggest underlining the last sentence: "These requirements do not pertain"
Mendocino Council of Governments	1	15	Paragraph 1 (continued from P. 14): The reference to MPOs in last sentence should be changed to "agencies" or RTPAs/MPOs.
Mendocino Council of Governments	1	15	Section 1.7: Is the Public Participation Plan requirement specific to the RTP, along with its requirements specified herein? Or, are agencies with an already adopted Public Participation Plan going to have to modify their plans to meet the requirements identified in this section? This needs clarification.
Mendocino Council of Governments	1	16	Identify Capital Investment Strategies: Delete word "metropolitan" in second line.
Mendocino Council of Governments	1	16	Congestion Management Process: Identify RTPAs where this is applicable.
Mendocino Council of Governments	1	17	last line on page: Reference to MPOs. Is this appropriate, or provided as a resource for RTPAs that may wish to benefit from Appendix L?
Mendocino Council of Governments	1	18	#9: Same comment as above (#10).
Mendocino Council of Governments	2	27	Requirements (Shalls) bottom of page: Federal requirement cited refers to MPOs and requirement of a TIP.
Mendocino Council of Governments	2	32	Paragraph 1: First sentence in first complete paragraph is incomplete.
Mendocino Council of Governments	2	39	Paragraph 3: Recommend keeping in language regarding four-year RTP option since it is still a relatively new option.
Mendocino Council of Governments	3	NA	General Comment: This entire chapter needs to be carefully edited to delete references to "MPO" where inappropriate and replace with "RTPA". Since there are many instances where reference to MPOs is appropriate (particularly with regard to RTPAs bordering MPOs that must coordinate with MPOs) the replacement will be more than just a word search and replace. It is important since these are a separate set of RTPA guidelines and agencies reading the guidelines need to recognize that these modeling requirements apply to RTPAs.
Mendocino Council of Governments	3	46	Requirements for RTP Analysis: In line 8, insert word "of" after word "part".
Mendocino Council of Governments	3	48	RTDM Quality Control and Consistency: In line 1, insert word "a" after word "is".
Mendocino Council of Governments	3	48	Consistency: In second bullet, replace word "sensitive" with word "sensitivity".
Mendocino Council of Governments	3	49	Model Input Assumptions: In Line 1 of 3rd paragraph, insert word "to" after word "required".
Mendocino Council of Governments	3	54	after 1st bullet: The non-indented sentence has a missing word or two.
Mendocino Council of Governments	3	58	Model Peer Review/Peer Advisory Committee: In second bullet, remove "n" from word "California".
Mendocino Council of Governments	3	58	Best Management Practices: In second line, remove the word "the" and replace word "scientist" with the word "scientific".
Mendocino Council of Governments	3	59	Third line from the top: Replace word "determine" with word "determining".
Mendocino Council of Governments	3	59	RTP Modeling Improvement Program: Suggest underling or bolding the last sentence for emphasis.

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Mendocino Council of Governments	3	59	<u>RTP Modeling Improvement Program</u> : The statement about Improvement Program Best Practices , the two bullet points that follow and language in between, is all unclear. How does all this relate?
Mendocino Council of Governments	3	61	<u>Policy analysis capabilities</u> : The significance of the bolded bullet is unclear.
Mendocino Council of Governments	3	62	<u>Policy analysis capabilities</u> : The significance of the bolded bullet is unclear.
Mendocino Council of Governments	3	63	<u>Policy analysis capabilities</u> : The significance of the bolded bullet is unclear.
Mendocino Council of Governments	3	66	Group A: In second reference to State, middle of page: In first line, change word “thank” to word “than”.
Mendocino Council of Governments	4	11	<u>State</u> : This is an incomplete sentence.
Mendocino Council of Governments	5.3	117	5.3 Environmental Requirements: Line 7 contains new inserted language stating “RTPAs are encouraged to comply as well.” In keeping with the guidelines format to use “shall” and “should” for guidance, it is suggested that the sentence be changed to “RTPAs should comply as well”.
Mendocino Council of Governments	6.2	134	<u>Financial Overview</u> : Line 2 in Paragraph 2 refers to the MPO. There is no reference to RTPAs.
Mendocino Council of Governments	6.5	138	<u>Revenue Identification and Forecasting</u> : Line 2, Paragraph 3 refers to a “metropolitan transportation plan”. Line 10 refers to “MPO”. I see no reference to RTPAs in this paragraph.
Mendocino Council of Governments	6	165	<u>Recommendations (Should)</u> : The next to last line on page makes reference to MPOs only.
Mendocino Council of Governments	6	168	<u>Congestion Management Process in the RTP</u> : In lines 12 and 13 of Paragraph 1, it is suggested that the word “invest” be replaced with the word “investing” and the word “and” be inserted before the word “integrated”.
Mendocino Council of Governments	NA	NA	General Comment: The last time I completely read the RTP Guidelines it was about 45 pages. I realize that many of my comments are grammatical, but I had them marked in red so you may as well consider them.
Rural Counties Task Force	NA	NA	RCTF supports the separation of the MPO and RTPA RTP guidelines.
Rural Counties Task Force	NA	NA	The guidelines structure needs to identify specific mandates from statute as “shalls” and potential best practices as “shoulds” throughout the RTP Guidelines.
Rural Counties Task Force	3	NA	Chapter 3 (Modeling) needs to be revised to address what is required by statute (shall) and recommendations (should). Many of the “shalls” included in this section are not required by statute and they need to be identified as recommendations instead. This chapter needs to also include a discussion of the different types of modeling tools and resources used across the various California MPOs and RTPAs, particularly the smaller rural RTPAs. Previously, this chapter had requirements and recommendations that were based on statute and what was reasonable given the capacity for small and large sized MPOs/RTPAs. The changes to this chapter have dramatically increased the modeling requirements for RTPs which would have a huge cost and resources impact that the smaller rural RTPAs do not have the resources to meet. Additionally, many of the RTPAs do not have modeling capabilities and often use consultant services for modeling needs.
Rural Counties Task Force	NA	NA	Best practices should not be included as a baseline of what is required, but instead provide representative examples from small and large, urban and rural RTPAs of excellent planning work that other RTPAs can emulate. This is particularly important as it relates to modeling analyses and social equity/environmental justice analyses.
Rural Counties Task Force	NA	NA	RCTF believes it is premature to include requirements for SB 743 as the guidance for this has not been finalized by OPR.
Stanislaus Council of Governments	1.7	15	On page 15 the document makes reference to MPOs. References to MPO are made in other sections throughout the document. Because this is a RTPA Guidelines document, RTPA should be used in place of MPO, where appropriate.
Stanislaus Council of Governments	3.5	59	On page 59, the second to last bullet says the MPO shall develop roadway network based on actual geometry of roadways. Not all models are able to provide this capability. For this reason, the word "shall" should be deleted and the text revised to indicate that this is suggested but not required.

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Stanislaus Council of Governments	3.5	62 , 63	On page 62, the sub-headings are: Freight Model, Policy Analysis Capabilities, Travel Demand Models, Regional Economic & Land Use Model. On page 63, those sub-headings are repeated. These groups of sub-headings appear to be missing an overall heading to divide them into sub-sections. Also on page 62, some of the language would only be completely understood by an experienced travel demand modeler. For example, "mode-choice log sums," and "logit based destination choice model" are terms that may not be universally understood. Perhaps additional text can be incorporated into the guidance to provide additional information so a wider array of users will be able to understand the modeling related guidance.
El Dorado County Transportation Commission	NA	NA	We support the development of separate and distinct guidelines for Metropolitan Planning Organizations (MPO) and RTPA's. The function and capability of RTPA's is very different than that of an MPO, so we appreciate the acknowledgement of those differences through the development of separate guidelines.
El Dorado County Transportation Commission	NA	NA	Please ensure that the next rendition of the guidelines provide clear differentiation between actions which are required and those which are recommended. We support the continuation of the use of the words "Shall" and "Should" and encourage you to ensure clarity between the two terms as best as possible.
El Dorado County Transportation Commission	NA	NA	The guidelines have a strong emphasis on reductions in Greenhouse Gas (GHG) emissions, and to some degree, emphasize Vehicle Miles Traveled (VMT) through references to Senate Bill 743. The SB 743 guideline development process is not complete. The guidelines should reflect the requirements of the statute and not an incomplete guideline and rulemaking process. The guidelines should recognize the continued advances in and increased use of alternative fuel vehicles, which will lead to the long-term reduction of the transportation sector's GHG generation. In rural areas, such as El Dorado County, land use distribution, geographic barriers, and a jobs-housing imbalance make transit use and active transportation less feasible options requiring rural transportation planning agencies to continue to consider vehicular strategies for improved mobility through long range planning. We recommend a more balanced discussion in the guidelines of GHG reduction in respect to other priorities in the development of improvements and maintenance of the transportation system. Rural areas have proportionally higher levels of interregional recreational travel and it would be helpful to have RTP best practices for GHG reduction strategies that can be achieved without negative economic impacts. We appreciate the acknowledgement of rural challenges as mentioned in Section 6.24. The current public health discussion is largely focused on active transportation and should be enhanced to include all modes of transportation.
El Dorado County Transportation Commission	NA	NA	We recognize that legislation was passed to specifically address the California Coastal Trail and the development of RTPs. We suggest that other significant potential active transportation facilities exist in California and general guidance should be included for them too.
El Dorado County Transportation Commission	3	NA	Throughout Chapter 3 there are several references to MPOs and Sustainable Communities Strategies (SCS). Chapter 3 needs to be revised to reflect the actual capabilities and requirements for RTPAs related to modeling and SCS development. Many RTPAs do not have modelling capabilities or expertise with which to perform these duties. Consequently, placing this burden on small RTPAs without also allocating resources will ultimately delay long range planning and project delivery.
El Dorado County Transportation Commission	3.1	45	In section 3.1 on page 45, there is reference to SB 375 and development of Sustainable Communities Strategies (SCSs). Please provide clarification about the concept of RTPAs developing SCSs or remove the reference to development of SCSs. In some areas of the state, including the Sacramento Area Council of Governments (SACOG) region, there are RTPAs located within an MPO region. These areas have specific requirements regarding modeling and air quality conformity analysis. It is reasonable to recommend that those RTPAs should work closely with the MPO to ensure consistency between the SCS and locally adopted RTP. As mentioned previously, Section 6.24 makes reference to RTPAs located within MPO boundaries, it might be helpful to cross reference this section throughout the guidelines.
El Dorado County Transportation Commission	6.15	NA	Section 6.15 of the guidance includes a description of the Regional Transportation Improvement Program (RTIP), the State Highway Operation and Protection Program (SHOPP) and the State Transportation Improvement Program (STIP). This section should clearly address the relationship between the RTP and these funding programs. Additional discussion is needed to explain how the rural RTP/RTIP public process assists the state achieve the necessary level of public involvement for submittal of the rural portion of the Federal State Transportation Improvement Program (FSTIP).

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Organization	Chapter	Ch. Page	Comment
El Dorado County Transportation Commission	6.1	NA	The list of transportation security planning measures in Section 6.21 should include the identification of alternate routes. Rural areas typically do not have large scale highways and transit, causing citizens to be highly dependent on alternate emergency evacuation routes. Thank you for your consideration of these comments, we appreciate your continued work in advancing transportation planning statewide, while balancing the needs of the vastly different regions throughout California.
Santa Cruz County Regional Transportation Commission	1.1	4	Please clarify RTPA responsibility to determine project costs based on life-cycle in the financial element. (Pages 4, 24, 140)
Santa Cruz County Regional Transportation Commission	1.3	9	Section 1.3, Page 9 – Clarify the date when the 2016 guidelines are applicable. “All RTPs adopted after XX date are to follow the 2016 guidelines.” The SCCRTC has already been working for more than a year on the 2040 RTP scheduled for adoption in June 2018. The planning for an RTP typically begins at a minimum of three years before the adoption date. A number of the milestones in the development of the Santa Cruz County RTP have already been developed and approved and thus would be challenging to revise substantially if required by updated guidelines. We request that it only apply to RTPs that are adopted at a minimum of two years after the final version of the guidelines is completed.
Santa Cruz County Regional Transportation Commission	2.2	24	Please clarify RTPA responsibility to determine project costs based on life-cycle in the financial element. (Pages 4, 24, 140)
Santa Cruz County Regional Transportation Commission	3	NA	Overall – The “shalls” in the RTP Guidelines, particularly related to the Chapter 3 modeling requirements, should be revised to recommendations (i.e. “shoulds” or “consider”) unless required by statute for RTPAs. There are a number of places in the guidelines (for example page 111) where there are specific requirements based on statutes for MPOs but there may not be statutes for RTPAs. The resources needed for this effort are already significant and each additional requirement adds considerably to the resources that are needed to develop this plan.
Santa Cruz County Regional Transportation Commission	3.6	66	Overall – There are numerous places throughout the document where there are missing words, typos or grammatical errors. For example – page 66 - Transportation planning agenciesy designat <u>e</u> d under California Government Code sections 29532 or 29532.1 are required to prepare and adopt <u>e</u> d an RTP that consider <u>s</u> factors specified in 23 USC 134 (Gov. Code, § 65080 (a)).
Santa Cruz County Regional Transportation Commission	3.6	66	Sections 3.6, Page 66 – Include a group labeled “RTPAs within an MPO” and list the Federal and State requirements.
Santa Cruz County Regional Transportation Commission	4	101	Chapter 4, Page 101 - Please clarify the requirements for consulting/coordinating with Tribal Governments and Tribes for RTPAs within MPOs. Santa Cruz County does not have any Federally recognized Tribal Governments but there are Native American archeological sites within the county.
Santa Cruz County Regional Transportation Commission	4.5	104	Section 4.5, page 104 – It states “The impact of the private freight sector on the transportation system is significant and must be included and documented in the RTP process.” Specify more explicitly the requirements for documenting the “impacts” of the private freight sector on the transportation system for RTPAs within MPOs and non-MPOs. Revise to differentiate between best practices and statute requirements.
Santa Cruz County Regional Transportation Commission	6.12	150-152	Page 150-152 - Specify more explicitly the requirements/best practices for RTPAs within an MPO for information on airports in the RTP and include relevant statute that requirements are based on.
Santa Cruz County Regional Transportation Commission	6.23	169	Page 169 – In the next draft add all applicable sections to this document rather than refer to the MPO guidelines. For example - “Please see Draft 2016 MPO RTP Guidelines for Sections 6.23 to 6.26 and 6.28.”
Santa Cruz County Regional Transportation Commission	6.6	140	Please clarify RTPA responsibility to determine project costs based on life-cycle in the financial element. (Pages 4, 24, 140)
Santa Cruz County Regional Transportation Commission	NA	NA	Overall – Differentiate the RTP requirements for RTPAs that are within a regional MPO and RTPAs that are not within an MPO. Develop separate checklists for each type of RTPA. Define nomenclature in document that defines when the use of “RTPA” refers to both RTPAs within an MPO and RTPAs not in an MPO. There is a substantial difference between requirements for an RTPA within an MPO compared to RTPAs not in an MPO that is critical to distinguish.
Santa Cruz County Regional Transportation Commission	NA	NA	Overall – Remove the many references to the requirements of MPOs as these guidelines are for RTPAs (within an MPO and not in an MPO). There are numerous locations specifically in the “Analysis and Modeling” chapter discussing what MPO’s shall or should do.
Santa Cruz County Regional Transportation Commission	NA	NA	Specify the Map-21/FAST performance measure requirements or links to the final requirements in the RTP guidelines.

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Inyo County Local Transportation Commission	NA	NA	California has a multi-faceted system of transportation planning agencies that reflect the diversity of the State. State law has managed to cleverly bend itself to use different requirements for vastly different areas. Please carefully consider the differences in regulatory frameworks for RTPAs in the creation of the 2016 Guidelines. Most relevant to the ICLTC are the large differences between requirements for an RTPA within a Municipal Planning Organization (MPO) compared to RTPAs. The ICLTC is the transportation planning agency for Inyo County and it is not inside of an MPO.
Inyo County Local Transportation Commission	2.3	26, 287	Page 26 and Page 287 - RTIP Acronym Distress The acronym RTIP is used to describe two or three different thing in the document. The acronym described in the glossary (Appendix K) on page 287 refers to something else than the RTIP that is referred to in Appendix A and B. On page 26, on page 191 of Appendix A, and on page 195 of Appendix B the acronym is associated with the STIP. This is the acronym that transportation agencies will be familiar with. It refers a program proposal of projects presented by each region to the California Transportation Commission for inclusion in the STIP. The acronym on page 7 and 287 for RTIP is used as another name for the FTIP applicable to RTPAs. This creates un- necessary confusion. I made the following comments for pages 101, 112, 116, and 123 before discovering the new use of this acronym. If you look carefully at the use of the RTIP acronym on page 101, it appears that the acronym is used in a third way to refer to the TIP required for MPOs. There are other places in the document such as pages 134, 139, 158, and 162 where the RTIP acronym is also referenced to in this new and confusing way. Please use a more suitable acronym when refuting to the FTIP and the TIP and apply the changes globally.
Inyo County Local Transportation Commission	3.1	45	Page 45 -Introduction The introduction makes several misstatements related to the applicability ty of SB 375 to Regional Transportation Plaru1ing Agencies (RTPAs). RTPAs that are not located within the boundaries of a metropolitan planning organization (MPO) are not subject to the provisions of SB 375 that require addressing regional greenhouse gas (GHG) targets in the RTP and preparation of sustainable community strategies (SCS). This is an important distinction that is blurred in the text.
Inyo County Local Transportation Commission	3.1	45	Pages 45 94 - Modeling Discussion Though this section does reference the requirements for RTPAs not included in an MPO on page 66, it is done so in such an order where it creates ambiguity especially as to what requirements are in place for an RTPA not included inside of an MPO.
Inyo County Local Transportation Commission	4.4	101	Page 101- Participation Plan. The second new paragraph on this page reads "Title 23 CFR Part 450.316(a)(l)(iii) requires the participation plan to use visualization techniques to describe the RTP and £.:RTIP." This is an incorrect reference to the RTIP. Non-MPO RTPAs do not have the same requirements as MPOs for the creation of a TIP. If you look at the Code referenced to it refers to the TIP. For RTPAs the TIP is presented in the Action Element of the RTP. Therefore, the words "and RTIP" should be deleted from the sentence. The proposed projects are included in the RTP.
Inyo County Local Transportation Commission	4.9	112	Pages 112 - Coordinated Public Transit I Human Services Transportation Plans This section includes language that states "As we the all FTA programs, transit projects selected for funding must be consistent with the RTP and RTIP." The consistency requirement is switched from the FTIP to the RTIP. This is not correct. The language should still refer to the FTIP. The RTJP is specifically programmed for the State Transportation Improvement Program every two years and only includes projects that require action by the California Transportation Commission. In the case of a rural RTPA such as the ICLTC the FTIP is maintained by the Rural, non-MPO Area Coordinator who updates the FTIP several times a year and in coordination with the Federal transit grant award process.

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Organization	Chapter	Ch. Page	Comment
Inyo County Local Transportation Commission	5.1	115	Page 115 - Introduction to RTP Environmental Considerations It is premature to include requirements for SB 743 since OPR has not yet released its guidance for the implementation of this bill. It is unclear how SB 743 will influence rural areas like Inyo County where there is no congestion management agency.
Inyo County Local Transportation Commission	5.2	116	Page 116 - Changes to the RTP/ FR TIP This section reads "When the MPO/RTPA modifies its RTP/ FR TIP, it must determine whether the proposed changes have the potential to impact the environment and trigger CEQA review." Again the author has a misunderstanding of the role of an RTIP. The RTIP is produced specifically as a proposal for the STIP. The STIP is exempt from CEQA. CEQA review is required for the RTP and for RTP updates, including an amendment to the Action Element. The reference to the RTIP should be deleted or the text could be revised to read "modifies project lists described in the RTP, it must determine..."
Inyo County Local Transportation Commission	5.6	123	Page 123 - 5.6 Project Intent Statements, Bullet #1 The RTIP is again incorrectly referenced here. The RTIP is not part of the RTP. The Action Element is the place for a financially constrained project list in the RTP.
Inyo County Local Transportation Commission	6.2	134-141	Page 134 through 141- Financial Overview There are some differences in the requirements for the creation of a TIP for RTPAs from MPOs that should be further explored in this section. An example of where there is a discrepancy is in the Potential Funding Shortfall section where the "Action Plan" is referred to. This does not apply to RTPAs that are not in an MPO.
Inyo County Local Transportation Commission	6.15	158	Page 158 - Coordination with Programming Documents What? The STIP is now going to become part of the RTIP? Again this is an unnecessary and confusing realignment of acronyms.
Inyo County Local Transportation Commission	6.18	162	162 - Performance Measures Low traffic volumes make the implementation of performance measures problematic in rural areas. Additionally, the addition of performance measures to grant programs such as the Active Transportation Program negatively impacts the ability of rural area to obtain transportation funding.