



August 15, 2016

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

SUBJECT: Comments on the 2016 Draft California Regional Transportation Planning Agency Regional Transportation Plan Guidelines

Dear Ms. Martinez-Velez:

Thank you for the opportunity to review the 2016 Draft California Regional Transportation Planning Agency (RTPA) Regional Transportation Plan (RTP) Guidelines.

The Rural Counties Task Force (RCTF) has the following comments and concerns regarding the 2016 Draft California RTPA RTP Guidelines:

- RCTF supports the separation of the MPO and RTPA RTP guidelines.
- The guidelines structure needs to identify specific mandates from statute as “shalls” and potential best practices as “shoulds” throughout the RTP Guidelines.
- 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.
- 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.
- RCTF believes it is premature to include requirements for SB 743 as the guidance for this has not been finalized by OPR.

The Rural Counties Task Force looks forward to participating in the update of the RTP guidelines. Thank you for the opportunity to review and comment on the 2016 Draft California RTPA Regional Transportation Plan Guidelines. If you have any questions, please contact me at (831) 264-5100.

Sincerely,

A handwritten signature in blue ink, appearing to read "Maura F. Twomey". The signature is fluid and cursive, with a prominent initial "M" and a long, sweeping underline.

Maura F. Twomey
Chair