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August 15, 2016

Katie Benour Chief, Caltrans Division of Planning  
MS-32 P.O. Box 942874  
Sacramento, CA 94274-0001

RE: 2016 Draft California Regional Transportation Planning Agency Regional Transportation Plan Guidelines

Dear Ms. Benour:

Thank you for the opportunity to review the 2016 Draft California Regional Transportation Planning Agency (RTPA) Regional Transportation Plan (RTP) Guidelines. EDCTC has the following comments and concerns regarding the 2016 Draft California RTPA RTP Guidelines:

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.

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.

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.

Throughout the document there are references to MPO's that should be removed. For example, the complete streets section on page 34 includes a case study from Southern California Association of Governments (SCAG) that refers to how MPOs can integrate neighborhood electric vehicles into a complete streets policy. More effort needs to be put into specific RTPA appropriate recommendations with consideration for rural communities which may not necessarily be consistent with the recommendations outlined in the MPO guidelines. While the end goal can remain similar, implementation toward that end goal may need to vary for RTPAs and rural communities. Additionally, the references to best practices in the RTPA guidelines should include examples of best practices from RTPAs.

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.

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.

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.

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).

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.

Sincerely,

*Sharon Scherzinger*

Sharon Scherzinger  
Executive Director