

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. 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.

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