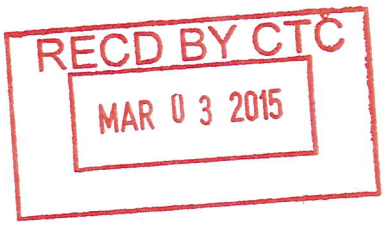
TAB 19

February 20, 2015

Honorable Carl Guardino
Chair, California Transportation Commission
Attention: Will Kempton, Executive Director
1120 N Street, Mail Stop 52
Sacramento, CA 95814



RE: Comments on the 2016 State Transportation Improvement Program (STIP) Guidelines

Dear Chairman Guardino,

The Southern California Association of Governments (SCAG), along with the six county transportation commissions within our jurisdiction, commend the California Transportation Commission (CTC) for its early and thorough outreach efforts on the proposed 2016 STIP guidelines. We appreciate the opportunity to comment on proposed revisions to the 2016 STIP guidelines in advance of the 2016 funding cycle to improve transparency and accountability.

We recognize that in this economic environment where transportation needs far exceed available revenues, it is crucial that programmed projects are tested for performance and cost effectiveness regardless of funding source. To that end, we understand all the challenges the CTC faces in developing guidelines that meet state and federal requirements while at the same time reflect and recognize the needs and processes of the regions. We appreciate the CTC's consideration of our comments in developing the final guidelines.

While we support efforts to improve transparency and accountability, data is not available to support all the performance measures listed in the draft STIP guidelines. As a result, SCAG and the six transportation commission in this region request the CTC consider amending the guidelines to provide greater flexibility in what is reported. We have included specific recommended changes to the guidelines in the attachment to this letter. The attachment also includes other minor revisions to the project specific evaluation "trigger" of $15 million or more and suggested form submittal improvements.

Finally, SCAG proposes to conduct the regional-level analysis for both system performance and cost-effectiveness for the six county transportation commissions, and each of the commissions will be responsible for project-specific evaluations. These comments are also included in the attachment.

Attachment to the Southern California Association of Governments 2016 STIP Guidelines Comment Letter dated February 18, 2015

In the SCAG region, the Regional Transportation Plan/Sustainable Communities Strategy (Plan) is developed through a bottom-up approach whereby our 6 county transportation commissions/Regional Transportation Planning Agencies (RTPA) (Imperial County Transportation Commission, Los Angeles County Metropolitan Transportation Authority, Orange County Transportation Authority, Riverside County Transportation Commission, San Bernardino Associated Governments, and Ventura County Transportation Commission) develop their respective investment priorities as approved by their governing boards, and provide that input into the SCAG Plan. RTPAs adopt their respective Regional Transportation Improvement Programs (RTIPs) component of the STIP at a county level. Projects included in RTIPs are identified directly from SCAG's Plan which meets both federal and state requirements, including federal transportation conformity and state greenhouse gas reduction targets established by SB375.

In addition, the adopted Plan undergoes a rigorous performance evaluation using a set of adopted performance measures, including mobility, accessibility, safety, reliability, equity (environmental justice), sustainability, economic impact and cost benefit analysis. The SCAG planning process ensures that only high performing projects that meet current state and federal requirements as well as regional mobility, economic and equity goals are included. Therefore, SCAG, in consultation with its six county commissions, would like to offer the following comments on section 19 A, B and C of the proposed Draft STIP Guidelines from this regional perspective.

A. Evaluation of system performance.

While we concur with the merits of a system level performance assessment, there are real limitations with the availability of data and tools to meaningfully evaluate all performance criteria outlined in the draft guidelines and establish a clear nexus between proposed actions (implementation of STIP) and potential performance outcomes. Therefore, we strongly recommend allowing MPOs and RTPAs maximum flexibility in meeting this requirement. We believe this can be accomplished by replacing the opening paragraph of section 19 A with the following:

Caltrans and each region that is a Metropolitan Planning Organization (MPO) or within an MPO shall include an evaluation of overall (RTP or CTP/ITSP level) regional level performance that addresses performance measures using the regions' existing monitored data as the baseline data. To the extent relevant data and tools are available, the below listed performance measures may be reported, as applicable:

B. Evaluation of the cost-effectiveness of the RTIP or ITIP.

Similarly, we believe adequate flexibility will be needed to perform evaluation of the cost-effectiveness of the RTIP or ITIP for the host of criteria identified in the draft guidelines. We believe this can be accomplished by replacing the opening paragraph of section 19 B with the following:

Janssen, Laurel@DOT

From: Sarkes M. Khachek [SKhachek@sbcag.org]
Sent: Tuesday, March 03, 2015 10:31 AM
To: Janssen, Laurel@DOT
Cc: 'RDeVere-Oki@sacog.org' (RDeVere-Oki@sacog.org)
Subject: RE: RTIP Template

Hi Laurel,

Thanks for your email.

We drafted the language below we'd prefer to be used. Let me know if you have any questions.

The Regional Transportation Planning Agencies Group (RTPA Group) has developed a template for submittal of the Regional Transportation Improvement Program (RTIP). The purpose of the template is to make RTIP submittals more consistent statewide and to present a visualization tool which provides information in an organized and transparent manner. The RTIP Template includes, but is not limited to, the following: contact information, a summary of previously completed projects, information on how regions are delivering projects and meeting state and federal goals, a public participation summary, a description of the relationship with the adopted Regional Transportation Program/Sustainable Communities Strategy, and a description of the performance and effectiveness of the RTIP.

The RTPA group encourages the use of the voluntary Regional Transportation Improvement Program (RTIP) Template by RTPAs for the 2016 State Transportation Improvement Program.

After approval by the RTPA Board, RTIPs will be made available electronically by the RTPA on their website. Links to all adopted RTIPs will be provided on the California Transportation Commission website.

The RTIP Template will be available for download prior to adoption of the 2016 STIP Guidelines at http://calrtpa.wordpress.com.

Thanks,
Sarkes

From: Janssen, Laurel@DOT [mailto:laurel.janssen@dot.ca.gov]
Sent: Tuesday, March 03, 2015 8:44 AM
To: Sarkes M. Khachek
Subject: RTIP Template

Here is the language I currently have in the proposed STIP Guidelines regarding the template. This is the first paragraph under section 20 – Submittal of RTIPs. Let me know if you prefer some other language. Thanks.

Submittal of RTIPs. After consulting with Caltrans, each regional agency shall adopt and submit its RTIP to the Commission and to Caltrans no later than December 15 of each odd-numbered year. ***Regional agencies are encouraged to use the RTIP template created by the RTPA group and available at XXX****. The RTIP will include and separately identify:*

Laurel Janssen
California Transportation Commission
916-651-6143

Janssen, Laurel@DOT

From: Kim, Sookyung [Sookyung.Kim@sandag.org]
Sent: Monday, February 09, 2015 5:11 PM
To: Janssen, Laurel@DOT; Waters, Laurie@DOT; Guzman, Juan@DOT
Cc: Nuncio, Jose; Vettese, Dawn; zur Nieden, Ariana; Kennedy, Rachel
Subject: Section 19
Attachments: comments to section 19.docx

Please see attached proposed changes to section 19, performance measures for the 2016 STIP. Using the current draft, the yellow highlighted red are the proposed additions while the green strikeout represent the proposed deletions. SANDAG worked with number of our MPO/RTPA colleagues. I will contact you later this week to see if these changes would be acceptable. Please let me know if you have any questions. Thanks

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19. Criteria for Measuring Performance and Cost-Effectiveness. **Regions and Caltrans are responsible for developing goals, objectives and priorities that include consideration of the overall performance of the transportation system consistent with federal and state planning requirements. These goals and objectives are incorporated in the region's regional transportation plan (RTP) and are also reflected in the region's RTIP, and similarly in Caltrans' interregional transportation strategic plan (ITSP) and ITIP.** In order to maximize the state's investments in transportation infrastructure, it is the Commission's policy that each RTIP and the ITIP will be evaluated, ~~as they are developed~~, for performance and cost-effectiveness at the regional ~~system~~ level and, **where applicable**, at the project level ~~where appropriate~~.

The Commission will evaluate each RTIP and the ITIP based on the following:

A. **An evaluation of system performance at the regional level and how each RTIP furthers the goals of the region's RTP, including its Sustainable Communities Strategies (SCS), if applicable and for Caltrans, how the ITIP furthers the goals of the California Transportation Plan (CTP) and the ITSP.**

B. **An evaluation of the cost-effectiveness of the RTIP at the regional level or ITIP at the statewide level.**

C. **For projects that have $15 million or more of STIP funding programmed in the construction phase or total project cost of $50 million or greater a ~~A~~ project specific evaluation will be performed, in relations to the regional system or identified corridor as defined in the RTP/SCS that addresses the changes to the built environment and, for larger projects, the associated estimated benefits of those changes.**

The Commission will consider the evaluations submitted by regions when making decisions on RTIPs as described in Section 60 of these guidelines. The Commission will consider the evaluations submitted by Caltrans when making decisions on the ITIP as described in Section 62 of these guidelines.

A. Evaluation of system performance.

Caltrans and each region that is a Metropolitan Planning Organization (MPO) or within an MPO shall include an evaluation of overall (RTP or CTP/ITSP level) regional level ~~system~~ performance that addresses ~~the following~~ performance measures using as the baseline, the regions' existing monitored data. To the extent relevant data and tools are available, the below listed performance measures may be reported, as applicable:

- **Vehicle Miles Traveled (VMT) per capita.**
- **Percent of congested VMT (at or below 35 mph).**
- **Commute mode share (travel to work or school).**
- **Percent of distressed state highway lane-miles.**
- **Pavement Condition Index (local streets and roads).**
- **Percent of highway bridge lane-miles in need of replacement or rehabilitation (sufficiency rating of 80 or below).**
- **Percent of transit assets that have surpassed the FTA useful life period.**
- **Highway Buffer Index (the extra time cushion that most travelers add to their average travel time when planning trips to ensure on-time arrival).**
- **Fatalities and serious injuries per capita.**

- Fatalities and serious injuries per VMT.
- Percent of housing and jobs within 0.5 miles of transit stops with frequent transit service.
- Mean commute travel time (to work or school).
- Change in acres of agricultural land.
- CO_2 emissions reduction per capita.

Regions outside a MPO shall include the above measures that the region currently monitors. A region outside a MPO may request, and Caltrans shall provide, data on these measures relative to the state transportation system in that region.

The evaluation of system performance shall include a qualitative or quantitative assessment of how effective the RTIP or the ITIP is in addressing or achieving the goals, objectives and standards which are established as part of the respective RTP or the CTP and the ITSP corresponding to the relevant horizon years within the region's RTP that covers ~~within~~ the 5-year STIP period e.g., horizon year 2020 for the 2016 STIP, horizon year 2030 for the 2018 STIP. Caltrans' evaluation of the ITIP shall also address ITIP consistency with the RTPs.

In addition, each region with an adopted sustainable communities strategy (SCS) shall include a discussion of how the RTIP relates to its SCS. This will include a quantitative or qualitative assessment of how the RTIP will facilitate implementation of the SCS and also identify any challenges the region is facing in implementing its SCS. In a region served by a multi-county transportation planning organization, the report shall address the portion of the SCS relevant to that region. As part of this discussion, each region shall identify any proposed or current STIP projects that are exempt from SB 375.

B. <u>Evaluation of the cost-effectiveness of the RTIP or ITIP.</u>

~~Each RTIP and the ITIP shall include a report on its cost-effectiveness~~. Regions and Caltrans shall, if appropriate, and to the extent the necessary data and tools are available, address the following criteria for measuring cost effectiveness of projects proposed in the STIP on a regional level ~~RTIPs and the ITIP:~~

- Decrease in VMT per thousand dollar invested.
- Decrease in percent of congested VMT per thousand dollar invested.
- Change in commute mode share per thousand dollar invested.
- Decrease in percent of distressed state highway lane miles per thousand dollar invested.
- Improvement in Pavement Condition Index per thousand dollar invested.
- Decrease in percent of highway bridge lanes miles in need of replacement per thousand dollar invested.
- Decrease in percent of transit assets that have surpassed the FTA useful life period per thousand dollar invested.
- Decrease in the Highway Buffer Index per thousand dollar invested.
- Decrease in fatalities and serious injuries per thousand dollar invested.
- Increase in percent of housing and jobs within 0.5 miles of transit stops with frequent transit service per thousand dollar invested.
- Decrease in mean commute travel time per thousand dollar invested.
- Decrease in air pollution emissions, including CO_2, per thousand dollar invested.

The Commission expects that evaluations of performance and cost-effectiveness will be on a life-cycle basis.

C. Project specific evaluation.

~~Each RTIP and the ITIP shall include a project specific evaluation for each project proposed that addresses the changes to the built environment and, for larger projects (defined below), the associated benefits of those changes.~~

For each project proposed, the region or Caltrans shall provide data on the proposed changes to the built environment, including but not limited to items listed below. Such data shall be included in the PPR. ~~the following~~:

For state highway projects:

- New general purpose lane-miles.
- New HOV/HOT lane-miles.
- Lane-miles rehabilitated.
- New bicycle/pedestrian lane/sidewalk miles.
- Operation improvements.
- New or reconstructed interchanges.
- New or reconstructed bridges.

For intercity rail and rail/transit projects:

- Additional transit miles or vehicles.
- Miles of new track.
- Rail crossing improvements.
- Station improvements.

For local street and road projects:

- New lane-miles.
- Lane-miles rehabilitated.
- New bicycle/pedestrian lane/sidewalk miles.
- Operation improvements.
- New or reconstructed bridges.

A project level benefit evaluation shall be submitted for projects for which construction is proposed, if:

- ~~The proposed STIP programming exceeds 50% of a county's target for new programming (as identified in the fund estimate), or~~

- The total amount of existing and proposed STIP for the project is $15 million or greater in the construction phase, or

- The total project cost is $50 million or greater.

The project level benefit evaluation shall address the specific benefits of the proposed project using as many of the following measures as are relevant:

- **Change in Vehicle Miles Traveled (VMT) per capita.**
- **Change in percent of congested VMT (at or below 35 mph).**
- **Change in commute mode share (travel to work or school).**
- **Change in percent of distressed state highway lane-miles.**
- **Change in Pavement Condition Index (local streets and roads).**
- **Change in percent of highway bridge lane-miles in need of replacement or rehabilitation (Sufficiency Rating of 80 or below).**
- **Change in percent of transit assets that have surpassed the FTA useful life period.**
- **Change in highway Buffer Index (the extra time cushion that most travelers add to their average travel time when planning trips to ensure on-time arrival).**
- **Change in fatalities and serious injuries per capita.**
- **Change in fatalities and serious injuries per VMT.**
- **Change in percent of housing and jobs within 0.5 miles of transit stops with frequent transit service.**
- **Change in mean commute travel time (to work or school).**
- **Change in acres of agricultural land.**
- **Change in CO_2 emissions reduction per capita.**

The project level **benefit** evaluation shall include a Caltrans generated benefit/cost estimate, **including life cycle costs,** ~~and identify the estimated impact the project will have on the annual cost of operating and maintaining the state's transportation system~~ **for projects proposed in the ITIP. For the RTIP, the regions can choose between the Caltrans estimate and its own estimate.** The evaluation ~~should~~ **shall** be conducted by each region and by Caltrans before the RTIPs and the ITIP are submitted to the Commission for incorporation into the STIP. ~~Each RTIP and the ITIP submitted to the Commission will be accompanied by a report on its performance and cost-effectiveness. A project level evaluation shall also be conducted for existing STIP projects with a total project cost of $50 million or greater or a total STIP programmed amount of $15 million or greater if construction is programmed in the STIP and CEQA was completed for the project after a region adopted its 2012 RTIP or, for Caltrans, after submittal of the 2012 ITIP~~.

Appendix B:

Performance Indicators, and Measures and Definitions

~~**Part A:**~~

~~Complete Part A.~~

Use the following to indicate quantitatively **the overall** **regional level** ~~system~~ **performance** ~~how the Regional Transportation Improvement Program (RTIP) or the Interregional Transportation Improvement Program (ITIP) is consistent with the goals established in your~~ **of your** Regional Transportation Plan (RTP) **or California Transportation Plan and** the Interregional Transportation Strategic Plan (ITSP). **For regions outside a MPO,** if any of the performance measures ~~in Part A~~ do not reflect the goals contained in ~~an~~ **the** RTP~~/ITSP~~ or ~~if an the RTIP/ITIP does not contain goals that~~ are **not currently being measured**~~, measurable by the performance~~

~~measures contained within~~, simply state "not applicable (na)" for each indicator or each performance measure (where appropriate).