

RTP Guidelines Final Draft Comment Table

Please note all page numbers are those of the 2-8-10 released final draft unless otherwise specified.

Comment #	Page #	Section	Name	Agency	Comment	Response
1	3	Section 1.1 Why Conduct Long Range Transportation Planning?	Luree Stetson	California Natural Resources Agency	Add "natural resources, environmental protection, and conservation" to the second sentence of the second paragraph under Section 1.1.	Comment incorporated.
2	18	Section 2.2 Regional Blueprint Planning and Climate Change Legislation	David Schonbrunn	TRANSDEF	Requested that the last sentence of the second paragraph under AB 32 The California Global Warming Solutions Act of 2006 which begins with "This is particularly relevant to the RTP Guidelines..." be placed as the second sentence in the paragraph.	Comment incorporated.
3	19	Section 2.2 Regional Blueprint Planning and Climate Change Legislation	Richard Lyon	CBIA	In Section 2.2 under the sub-heading Regional Blueprint Planning Program the last sentence in this sub-section: "The development of the SCS and APS, if applicable, should continue a balanced approach to regional planning to consider transportation, land use and a wide range of environmental issues such as public health and open space issues" should be deleted.	Comment noted, language removed as requested.
4	21	Section 2.4 Relationship Between the RTP, OWP, FTIP and STIP	Elisa Arias	SANDAG	At the bottom of page 21 under bullet b. please add that the ITIP is prepared by Caltrans in consultation with MPOs and RTPAs. Also on page 22 in the table illustrating the time horizon, contents and update requirements of the key planning documents, please change the update requirements for the FTIP to "At least every 4 years"	Comments incorporated.
5	22	Section 2.5 Consistency with Other Planning Documents	Tami Grove	CA Coastal Commission	While we understand that not all jurisdictions prepare City or County Trail Master Plans, we nonetheless believe that it is important for MPOs/RTPAs to incorporate or consult such documents where they have been developed. We also note that other agencies prepare trail plans that could be relevant to transportation system considerations. As such, we would suggest that you add a number 8 to the list that includes "Public Agency Trail Plans (where applicable)."	Comment incorporated.
6	24	Section 2.6 Coordination with Other Planning Processes	Tami Grove	CA Coastal Commission	We believe that cross-referencing the Complete Streets Programs with the CCT provisions will strengthen MPOs/RTPAs understanding of the potential connections between the two undertakings. We suggest that you add the following language: "Along the shoreline of coastal counties, one element of the Complete Streets Program should be the California Coastal Trail (CCT), for additional information regarding the CCT see Section 6.13."	Comment incorporated.
7	24	Section 2.6 Coordination with Other Planning Processes	Stephen Gale	Sonoma County Democratic Party	Submitted a letter supporting the inclusion of complete streets within the RTP Guidelines.	Comment noted, Complete Streets policies are included in Section 2.6 Coordination with Other Planning Processes on p. 24

8	26	Section 2.6 Coordination with Other Planning Processes	Ron Milam	Fehr & Peers	The way that the Corridor System Management Planning (CSMP) sub section is written suggests that congestion relief and vehicle throughput are the emphasis. Should this language be modified to recognize the tradeoffs associated with the positive effects of heavily used freeways especially with regards to transit use, efficient land use patterns, and reduced emissions. At a minimum something more consistent with the new Caltrans Smart Mobility Framework would seem appropriate.	Comment noted, the language in the CSMP sub-section was re-written to emphasize multi-modal focus and consideration of statewide and regional objectives which can include multi-modal mobility, accessibility, environmental protection, GHG reduction, etc.
9	28	Section 2.7 RTP Development Sequencing Process	Elisa Arias	SANDAG	In the last paragraph of Section 2.7 please amend the first sentence to reflect that the action taken by federal agencies is to find the RTP in conformity with the applicable air quality state implementation plan, there is no approval of a transportation air quality conformity report.	Comment incorporated, sentence was amended to read: "...adopt an RTP with a transportation air quality conformity report that has been found in conformity with the applicable air quality state implementation plan..."
10	29	Section 2.7 RTP Development Sequencing Process	Elisa Arias	SANDAG	In the flowchart on page 29 on the bottom left for "MPOs in air quality non-attainment or maintenance areas" please revise language to reflect that FHWA/FTA/EPA make a finding of conformity and that conformity determination starts the RTP update clock.	Comment incorporated, language amended to read: "If found in conformity with the applicable air quality state implementation plan, conformity determination starts the RTP update clock."
11	61	Section 4.1 Consultation and Coordination	Luree Stetson	California Natural Resources Agency	Add "and resource agencies" to the fourth sentence of the fourth paragraph under Section 4.1 as agencies with which MPOs in non-attainment and maintenance areas must coordinate their RTP development.	Comment noted, however this sentence explicitly refers to the consultation process that is a requirement of the federal air quality conformity determination process for coordination of RTPs with the SIP. Guidance for consultation with resource agencies during RTP development is covered in Section 4.9.
12	62	Section 4.2 Social Equity and Environmental Justice Considerations in the RTP	Julie Snyder, Parisa Fatehi	Housing CA and Public Advocates	Requested that Section 4.2 be moved to Chapter 1 as the social equity and environmental justice language in Section 4.2 relates not only to RTP consultation but also to the content of the RTP, therefore, Chapter 1 is a more appropriate location for the section.	Comment noted and Section 4.2 was added as a key addition to the RTP Guidelines in Section 1.7, however staff determined that the discussion of Social Equity and Environmental Justice guidance in Chapter 4 was appropriate given the existing federal requirements for public participation in 23 CFR 450 and also due to the fact that the consultation and public participation process associated with RTP development serves to inform RTP content. Additionally, a best practice link was added to Section 4.2 to highlight environmental justice analysis work conducted by Kern COG.
13	62	Section 4.2 Social Equity and Environmental Justice Considerations in the RTP	David Schonbrunn	TRANSDEF	The first sentence of the first paragraph of this section should be amended to read: "The inclusion of the entire range of community interests in the development of the RTP is a key element in the process..."	Comment incorporated, this sentence was also modified as suggested on p.134 in Section 6.25.
14	62	Section 4.1 Consultation and Coordination	David Schonbrunn	TRANSDEF	Requested that the second to the last sentence of the best practices paragraph be amended to read: "Responsiveness to community input is a key characteristic of an open and collaborative planning process, and reduces the resentments that lead to lawsuits."	Comment noted, however, as the best practices are intended to provide MPOs and RTPAs with information and examples of innovative and successful planning efforts, language was not changed as requested.

15	63	Section 4.2 Social Equity and Environmental Justice Considerations in the RTP	Julie Snyder, Parisa Fatehi	Housing CA and Public Advocates	On p. 63 under the Federal Requirements (Shalls) paragraph please add the following citations: "implementing orders under Executive Order 12898 on Environmental Justice (1994); US DOT Order 5610.2 (1997) and US DOT Order 6640.23 (1998).	Comment incorporated.
16	63	Section 4.2 Social Equity and Environmental Justice Considerations in the RTP	Julie Snyder, Parisa Fatehi	Housing CA and Public Advocates	On p. 63 under the State Requirements (Shalls) paragraph please add citations and links to Caltrans Director's Policy, Title VI and Caltrans Director's Policy #21: Environmental Justice.	Comment noted however Caltrans Director's policies do not provide directives for MPOs and RTPAs and therefore are not appropriate for inclusion as state requirements in the RTP Guidelines.
17	63	Section 4.2 Social Equity and Environmental Justice Considerations in the RTP	Julie Snyder, Parisa Fatehi	Housing CA and Public Advocates	On p. 63 please add the following language: "Title 23 CFR Part 450.316(b)(1) requires the metropolitan transportation planning process to "include a proactive public involvement process that provides complete information, timely public notice, full public access to key decisions, and supports early and continuing involvement of the public in developing plan and TIPs and meets the requirements and criteria specified as follows...(vi) Seek out and consider the needs of those traditionally underserved by existing transportation systems, including but not limited to low-income and minority households."	Comment noted, language was paraphrased to more directly quote statute and was included on p. 63 as requested.
18	63	Section 4.2 Social Equity and Environmental Justice Considerations in the RTP	Julie Snyder, Parisa Fatehi	Housing CA and Public Advocates	On p. 63 please add the following language: "MPOs should ensure the involvement of low-income and minority households by proactively seeking the input of these households and making public meetings as accessible as possible. Recommended practices include: holding meetings outside of traditional working hours (e.g. evenings and weekends); locating meetings in low-income communities and communities of color; locating meetings at sites accessible via affordable transit; translating meeting materials for non-English speakers; providing interpretation at meetings for non-English speakers; and ensuring meetings are attended by MPO decision makers in addition to MPO staff."	Comment incorporated as best practices language on p. 63.
19	64	Section 4.3 Participation Plan	Terry Amsler	Institute for Local Government	Requested to add the phrase "as well as an opportunity" to the introductory sentence of Section 4.3 as well as add the following sentence to the end of the paragraph "At the same time, especially as a result of SB 375, there may be increased interest in regional transportation planning by individuals and groups not previously involved." Using the challenge language alone sets a negative tone for participation in general, and in fact this is also an opportunity for improved participation and planning outcomes, especially given the additional interest by community and stakeholder groups due to SB 375.	Comment incorporated.
20	64	Section 4.3 Participation Plan	Terry Amsler	Institute for Local Government	Requested that the statutory language from 23 CFR 450.316(a)(1)(i), (ii), (v), and (vii) be included on p. 64 as these are particularly important provisions for regional agencies if they are to develop successful and well-received public participation.	Comment incorporated, statutory language added.

21	65	Section 4.3 Participation Plan	Elisa Arias	SANDAG	The sentence which reads: "MPOs that currently have a public participation plan per federal requirements do not need to adopt another plan to meet new SB 375 requirements for additional public participation." should be moved from page 66 to the end of the first paragraph on page 65 so that the distinction is made earlier that multiple plans are not required.	Comment incorporated.
22	65	Section 4.3 Participation Plan	Terry Amsler	Institute for Local Government	Requested that the following language be added to the third paragraph on p. 65 "It is recommended that, to the extent that there are resources and it is practicable, the draft RTP elements, as well as any comments received on the draft elements, be posted on the MPOs/RTPAs website in a way that is easily accessible to the public." It would add transparency to the process and to public knowledge and confidence if public comments are available online, as are the draft and adopted RTP, particularly if this could occur as the planning process moves forward.	Comment noted, suggested language was paraphrased and added to best practice language in Section 4.1 on p.62.
23	65	Section 4.3 Participation Plan	Terry Amsler	Institute for Local Government	Requested the following language be added after the last paragraph on p.65 "MPOs are also encouraged to draw on successful Regional Blueprint Planning-related practices that have served to effectively engage the public in the development of community preferred growth scenarios in their respective or other regions."	Comment noted however existing language in Section 2.2 encourages MPOs to build upon Regional Blueprint Planning efforts.
24	65	Section 4.3 Participation Plan	Terry Amsler	Institute for Local Government	Requested the following language be added after the last paragraph on p. 65 "In order to inform and to encourage greater participation of those traditionally underserved by existing transportation systems, such as low income and minority residents, MPOs are encouraged, to the extent practicable, to develop partnerships with local, regional and state-wide organizations that can assist in achieving these RTP participation goals." While this is only encouragement language it suggests public participation good practices or access to good practices. The use of partnerships to engage harder to reach populations can save time and money and also tend to make such efforts more successful.	Comment noted, suggested language was added to best practices information provided in Section 4.2 on p.63.
25	66	Section 4.3 Participation Plan	Terry Amsler	Institute for Local Government	Requested to amend the second paragraph on p. 65 to read "MPOs and RTPAs are also encouraged to involve the media, including ethnic media, as a tool to promote public participation in the RTP development, review, and commenting process."	Comment paraphrased slightly to include the phrase "as appropriate" and incorporated.
26	68	Section 4.5 Consultation with Interested Parties	Luree Stetson	California Natural Resources Agency	To the last sentence of the first paragraph of Section 4.5, add "natural resources" to the list of areas of consultation.	Comment noted, however environmental issues are already listed as an area of consultation and Section 4.9 covers specific consultation requirements for natural resources.
27	73	Section 4.9 Consultation with Resource Agencies	Luree Stetson	California Natural Resources Agency	Please correct the following agency names on the list on p. 73: California Natural Resources Agency, California Department of Resources, Recycling, and Recovery, California State Mining and Geology Board, and California Department of Conservation.	Comment incorporated.
28	80	Section 5.2 Environmental Documentation	Scott Morgan	OPR	The CEQA statute and guidelines only talk about supplements to EIRs and do not mention NDs or MNDs, please amend the language under the Supplement sub-section to read as follows to ensure consistency: "A Supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised. The Supplement only needs to meet the circulation and public review requirements of a draft EIR.	Comment incorporated.

29	81	Section 5.3 SAFETEA-LU Environmental Requirements	Autumn Bernstein, Amanda Eaken, Julie Snyder, Liz O'Donoghue	ClimatePlan	Page 81: Amend Requirements (Shall) to read: Title 23 CFR Part 450.322(g)(1) and (2): "Requires that the MPO shall consult, as appropriate, with State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the transportation plan. The consultation shall involve, as appropriate: (1) Comparison of transportation plans with State <i>and regional</i> conservation plans or maps, if available;..."	Comment noted however the requirement for Title 23 CFR Part 450.322(g) (1) and (2) is a verbatim quotation from statute and therefore was not amended to read as requested.
30	82	Section 5.3 SAFETEA-LU Environmental Requirements	Autumn Bernstein, Amanda Eaken, Julie Snyder, Liz O'Donoghue	ClimatePlan	Page 82: expand on existing best practice language referring to regional advance mitigation to read: "Advanced mitigation planning to identify areas for mitigation prior to project-by-project discussion is a best practice. Elkhorn Slough Early Mitigation Project and Regional Advanced Mitigation Planning (RAMP) are important examples of such efforts. By coordinating early with agencies responsible for project-level permitting to evaluate the individual and cumulative impacts of one or several projects and focusing mitigation on regional priority conservation opportunities in the region, ecosystem-scale conservation needs can be met, providing more effective conservation and mitigation. In addition, the time and cost inefficiency of project-by-project review, permitting, and mitigation can be avoided, thereby making mitigation more efficient. MPO's and RTPA's should consider using RAMP in siting and mitigating for infrastructure projects, in order to maximize time efficiency, reduce mitigation costs, and protect the respective region's natural resources."	Comment paraphrased and incorporated, best practices language now reads: "Advanced mitigation planning to identify areas for mitigation prior to project-byproject discussion is a best practice. Elkhorn Slough Early Mitigation Project and Regional Advance Mitigation Planning (RAMP) are important examples of such efforts. By coordinating early with agencies responsible for project-level permitting to evaluate the individual and cumulative impacts of one or several projects and focusing mitigation on regional priority conservation opportunities, ecosystem-scale conservation needs can be met, providing more effective conservation and mitigation. In addition, the time and cost inefficiency of project-byproject review, permitting, and mitigation can be avoided thereby making mitigation more efficient. MPOs and RTPAs may consider using RAMP in siting and mitigating for infrastructure projects, in order to maximize time efficiency, reduce mitigation costs, and protect regional natural resources."
31	84	Section 5.5 Key Environmental Considerations for Best Practices	Luree Stetson	California Natural Resources Agency	Please add the following links to Section 5.5: under Parks, Refuges, and Historic Sites - add a link to the State Parks website, under Threatened and Endangered Species add links to Dept. of Fish and Game websites for adopted HCPs, mapping habitat corridors and the BIOS system.	Comment incorporated.
32	85	Section 5.5 Key Environmental Considerations for Best Practices	Richard Lyon	CBIA	Requested that the best practices language regarding "Greenprinting" on p. 88 of the January 5th Draft RTP Guidelines, be replaced with the following language : "As a best practice to comply with the requirements of CA Government Code Section 65080(b)(2)(b) as well as Title 23 CFR Parts 450.322(f)(7), 450.322(g)(1) and (2), MPOs may develop a Regional Open Space and Conservation Area Framework that identifies and considers "resource areas" and "farmland" defined in Government Code Section 65080.01(a) and (b)."	Comment noted, suggested language incorporated. Additionally an informational link to EPA's regional open space conservation website was included.
33	94	Section 6.1 Summary of RTP Components	David Schonbrunn	TRANSDEF	Number 7 under the list of statutory requirements of the SCS which states that the SCS is required to utilize the most recent planning assumptions considering local general plans and other factors, should cross reference Section 6.25 for additional information.	Comment incorporated.
34	95	Section 6.1 Summary of RTP Components	David Schonbrunn	TRANSDEF	Under the Consistency Between the SCS and the RTP Policy, Financial and Action Elements sub-section on p.95, the second sentence should be amended to read: "This means that the contents of the Policy, Action, Financial Elements, and Sustainable Communities Strategy shall be consistent with one another."	Comment incorporated.

35	95	Section 6.1 Summary of RTP Components	David Schonbrunn	TRANSDEF	Under the Consistency Between the SCS and the RTP Policy, Financial and Action Elements sub-section on p.95, the third sentence should be amended to read: "Transportation investments shall be consistent with or supportive of the forecasted development pattern contained in the SCS."	Comment noted, however based upon the lack of consensus regarding this item at the January 13th Joint Subcommittee meeting, the sentence was not amended as requested. To provide consistent reference to internal consistency language however, this sentence was re-written so that language referring to internal consistency on pages 95 and 126 is the same: "As a result, transportation investments and the forecasted development pattern in the SCS should be complementary and not contradictory."
36	95	Section 6.1 Summary of RTP Components	David Schonbrunn	TRANSDEF	The paragraph beginning with "Government Code Section 65080(b)(4)(C) states..." should be located elsewhere as it is way too specific for an introduction.	Comment noted and relocating this language was considered. However, given that it is a new Government Code provision of SB 375 and is of particular importance to rural areas, staff elected to leave it in its current location within the Guidelines.
37	95	Section 6.1 Summary of RTP Components	Greg Nord	OCTA	Please consider revising the second sentence under Consistency Between the SCS and the RTP Policy, Financial, and Action Elements sub section so that it is consistent with the language in the second paragraph on p. 126.	Comment noted, to provide consistent reference to internal consistency language, this sentence was re-written so that language referring to internal consistency on pages 95 and 126 is the same: "As a result, transportation investments and the forecasted development pattern in the SCS should be complementary and not contradictory."
38	104	Modal Discussion	Richard Nordahl	Caltrans Office of Goods Movement	Caltrans OGM provided the following language for inclusion in the Modal Discussion on p. 104: "It is also important for MPOs and RTPAs to integrate modal considerations to enable the development of a complete and connected multimodal transportation system. As modes often overlap (e.g. transit vehicles and private vehicles use the same modes, and people and goods use multiple modes), consider how all transportation modes interact with one another, and how improvements in one mode can benefit the entire transportation system."	Comment incorporated as paragraph three under Modal Discussion.
39	105	Section 6.9 Local Streets & Roads	DeAnn Baker	CSAC	CSAC prepared a new Section 6.9 which addresses Local Streets and Roads for inclusion in the Modal Discussion section of the RTP Guidelines. Full text of the proposal is available on the CTC website: http://www.catc.ca.gov/programs/rtp/awdc.htm	Section 6.9 was circulated for subcommittee review and based upon comments received staff incorporated suggested language as it appears on p. 105 of the Final Draft RTP Guidelines.
40	105	Section 6.9 Local Streets & Roads	Wendy Alfsen	CA Walks	CA Walks provided comments to the new Local Streets and Roads section which included adding public transit, bicycling and pedestrian transportation to the list of unmet needs in #1 as well as adding transit stop, lane and crosswalk, curb ramps and lighting to the #6 list of system preservation assessments to support a functioning and integrated multi-modal system.	Comments incorporated. Additional comments that were not incorporated during this update have been retained for future reference during the next RTP Guidelines update.
41	106	Section 6.10 Transit	Ron Milam	Fehr & Peers	Requested the following be added to the list of mass transportation issues that be studied in the RTP: "12.) A measure of transit capacity utilization for peak and off peak service to evaluate service effectiveness." and "13.) An evaluation of roadway policies and projects to ensure congestion relief through roadway capacity expansion does not adversely affect transit projects."	Comment noted, suggested language for 12.) incorporated, suggested language for 13.) not incorporated as MPO consultation regarding feasibility is needed before inclusion.
42	107	Section 6.11 Goods Movement	Richard Nordahl	Caltrans Office of Goods Movement	Caltrans OGM reviewed and updated Section 6.11.	Comments incorporated.

43	108	Section 6.12 Regional Aviation System	Kevin Ryan	Caltrans Division of Aeronautics	Caltrans Division of Aeronautics as well as the Technical Advisory Committee on Aeronautics (TACA) reviewed and updated Section 6.12 including changing the section title to Regional Aviation System.	Comments incorporated.
44	112	Section 6.13 Bicycle & Pedestrian Including AB 1396 California Coastal Trail	Tami Grove	CA Coastal Commission	Please add the link provided to the Best Practices section for readers to access information about the CCT Definition and Design and Siting Standards.	Comment incorporated, link added.
45	113	Section 6.14 Transportation Systems Operations & Management	DeAnn Baker	CSAC	Suggested the addition of the following best practices information and weblink for inclusion in Section 6.14: A U.S. Department of Transportation document titled, "Traffic Signal Operations and Maintenance Staffing Guidelines," provides guidelines to estimate the staffing and resource needs required to effectively operate and maintain traffic signal systems. Specifically, Chapter 1.3.1 provides a suggestion on the level of maintenance that is necessary. See http://ops.fhwa.dot.gov/publications/fhwahop09006/fhwahop09006.pdf	Comment incorporated.
46	114	Section 6.15 Coordination with Programming Documents	Elisa Arias	SANDAG	Regarding the last sentence in this section on p.114 which reads: "Federally-funded projects or non-federally funded regionally-significant projects cannot be added to the FTIP or FSTIP unless they are included in the RTP" Nothing in 23 CFR 450.324 identifies this requirement. Should funds become available, regions have and should continue to be able to program at least the study or initial phase of a project without it being listed in the RTP.	Comment noted, however after consultation with Caltrans Division of Programming, staff determined that 23 CFR 450.216(k) states that each project or project phase included in the STIP shall be consistent with the long range transportation plan developed under 450.214 and in metropolitan planning areas, consistent with the approved metropolitan transportation plan developed under 450.322. Based upon this requirement language in 6.15 was not changed as requested.
47	115	Section 6.16 Transportation Projects Exempted from SB 375	Amanda Eaken	NRDC	Modify the language about exempted projects to read as follows: "These projects, however, are exempt from the internal consistency requirement. In other words, these projects may not be <i>excluded</i> from the RTP <i>solely because</i> they do not contribute to the overall goal of reducing if they are inconsistent with the SCS or other policies to reduce regional GHG emissions."	Comment noted however based upon the consensus reached at the December 2nd Project Exemption workgroup meeting, suggested changes were not made as existing language represents general stakeholder consensus.
48	115	Section 6.16 Transportation Projects Exempted from SB 375	Greg Nord	OCTA	OCTA supports the exemption language as it appears in the January 5th Draft of the RTP Guidelines.	Comment noted, exemption language in the Final Draft RTP Guidelines represents consensus reached at the December 2nd Project Exemption Workgroup meeting.
49	118	Section 6.19 Performance Measures	Luree Stetson	California Natural Resources Agency	After #6 of the second bulleted list on p. 118, add new examples of natural resources performance measures e.g. "Increase in natural resources protected, acres of farmland and habitat protected, number of design features which protected resources and reduced wildlife impacts, etc."	Comment noted, however the natural resources performance measures suggested are addressed through the mitigation requirements of SAFETEA-LU as well as advanced mitigation planning best practices outlined in Sections 5.3, 5.4, and 5.5.
50	118	Section 6.19 Performance Measures	Tami Grove	CA Coastal Commission	We support the inclusion of "bicycle and pedestrian facilities" in the list of subject areas for which MPOs/RTPAs should develop performance measures.	Comment noted.

51	118	Section 6.19 Performance Measures	Ron Milam	Fehr & Peers	Requested the following language be added after the numbered list at the bottom of p. 118, "Some of these measures may compete or conflict with each other depending on the specific thresholds that are set. Tradeoffs between performance measure thresholds should be clearly identified and priorities set to avoid confusion about project-objectives."	Comment incorporated, paraphrased to read: "Tradeoffs between performance measure thresholds should be clearly identified and priorities set to avoid confusion about project objectives, because some of these measures may compete or conflict with one another depending on the specific thresholds that are set."
52	122	Section 6.22 Congestion Management Process	David Schonbrunn	TRANSDEF	The first sentence of Section 6.22 which ends with "for highest productivity" should be amended to reflect the following language: "to balance the MPO's objectives which are likely to include multi-modal mobility, accessibility, environmental protection, and greenhouse gas emissions reduction."	Comment noted, the suggested MPO objectives are now included as considerations in Section 2.6 on p. 27. Based upon consultation with Caltrans Advanced Systems Planning staff, the definition of increased productivity in the first paragraph was expanded to include all modes and to cite ways in which mobility may be increased without increasing greenhouse gas emissions.
53	122	Section 6.22 Congestion Management Process	Ron Milam	Fehr & Peers	Is highest productivity the only desired goal or are we trying to balance productivity with GHG reduction goals? Are effective mobility gains the only criterion? How does congestion management now relate to the GHG reduction goal? This section seems to suggest that SB 375 does not change the focus on congestion relief, is this an accurate statement? Or, should the congestion management process now consider GHG reduction as another objective? It seems this section should be viewed through the new SB 375 lens which may also suggest that CMPs also require a new look. Otherwise much of the RTP and CMP process will still remain myopically focused on congestion relief. This could lead to inconsistencies in project selection and programming as it relates to goals to increase transit ridership and reduce GHG emissions.	Comments noted, based upon consultation with Caltrans Advanced Systems Planning staff, the definition of increased productivity in the first paragraph was expanded to include all modes and to cite ways in which mobility may be increased without increasing greenhouse gas emissions. Additionally, also based upon consultation with Caltrans Advanced Systems Planning staff, the description of the congestion management planning approach was expanded to include not only new capacity but also, maintenance of existing infrastructure, investment in and encouraged use of alternative modes, smart land use, transportation management systems, incident management, etc. The issue of revisiting congestion management process guidance to reflect the goals of SB 375 could possibly be addressed during the next RTP Guidelines Update and would need to involve technical advisory committee input and consultation with federal transportation partners.
54	123	Section 6.22 Congestion Management Process	David Schonbrunn	TRANSDEF	The Congestion Management Process in the RTP sub-section should be amended to reflect the following language: "to balance the MPO's objectives which are likely to include multi-modal mobility, accessibility, environmental protection, and greenhouse gas emissions reduction."	Comment noted. Based upon consultation with Caltrans Advanced Systems Planning staff, the description of the congestion management planning approach was expanded to include new capacity, maintenance of existing infrastructure, investment in and encouraged use of alternative modes, smart land use, transportation management systems, incident management, etc.
55	125	Section 6.24 Contents of the SCS	Autumn Bernstein, Amanda Eaken, Julie Snyder, Liz O'Donoghue	ClimatePlan	Requested the following language be added to the third paragraph under SCS Background: "In adopting the Scoping Plan Resolution, the Air Resources Board stated its intent that the SB 375 greenhouse gas emission reduction targets it will set will be the most ambitious achievable. Because of the MPO's involvement in the target-setting process, it is reasonable to expect that an SCS will be able to achieve its target if its policies and programs are sufficiently ambitious."	Based upon discussion of this language at the 1-20-10 Land Use and Housing Meeting, the first sentence was incorporated into the introductory paragraph of Section 6.23. Consensus was not reached on the second sentence, therefore it was not incorporated.

56	125	Section 6.24 Contents of the SCS	Autumn Bernstein, Amanda Eaken, Julie Snyder, Liz O'Donoghue	ClimatePlan	Requested the following language be added after the third paragraph in Section 6.24: "Whether or not a region is able to actually hit their target with the SCS, the legislative intent of SB 375 is clear: an SCS must reduce greenhouse gas emissions to the greatest extent feasible.) ARB will look to see whether or not the SCS contains the most ambitious achievable level of effort. This means that if a region cannot meet its target within the SCS, but instead has to create an APS, the SCS should still be a substantial improvement over business as usual land use and transportation planning, and their regions and member cities would see substantial co-benefits as a result of implementing the SCS. In addition, if a region must prepare an APS, that alternative scenario must still represent "the most practicable choices for achievement of the greenhouse gas emission reduction targets." Cal. Govt. Code § 65080 (b)(2)(H)(iii)."	Based upon discussion of this language at the 1-20-10 Land Use and Housing Meeting, this statement was slightly modified to more directly quote the RTAC report and Government Code Section 65080(b)(2)(I)(iii) and was incorporated into the third and fourth paragraphs of Section 6.24 on pgs. 125 and 126 of the Final Draft.
57	125	Section 6.24 Contents of the SCS	David Schonbrunn	TRANSDEF	Requested that the following language be inserted after the second paragraph in Section 6.24: "The SCS is designed to encourage regional agencies and local government to adopt policies and make investments that will reduce regional greenhouse gas emissions, to the extent feasible. The development of the RTP is the primary long-range regional planning process through which MPOs and local governments target transportation investments, collaborate on land use patterns and consider growth strategies that strive toward reducing regional GHGs."	Comment noted, however the third paragraph of Section 6.24 conveys the requirement that the SCS set forth a forecasted development pattern that when integrated with transportation measures and policies will reduce regional GHG emissions to meet the ARB target if there is a feasible way to do so.
58	126	Section 6.24 Contents of the SCS	David Schonbrunn	TRANSDEF	The third sentence of the last paragraph in the SCS Background sub-section should be amended to read: "As a result, transportation investments and the forecasted development pattern in the SCS shall be complementary and not contradictory." This is clearly a Shall as is follows the consistency requirement.	Comment noted, however based upon the lack of consensus regarding this item at the January 13th Joint Subcommittee meeting, the sentence was not amended as requested. To provide consistent reference to internal consistency language however, this sentence was re-written so that language referring to internal consistency on pages 95 and 126 is the same: "As a result, transportation investments and the forecasted development pattern in the SCS should be complementary and not contradictory."
59	127	Section 6.27 Land Use and Transportation Strategies to Address Regional GHG Emissions	David Schonbrunn	TRANSDEF	Regarding the first sentence in this section which begins: "Better land use and transportation strategies will continue to be important to both MPOs and RTPA's in developing their RTPs..." Let's be honest here. Current Planning is not integrated, the sentence should read "The integration of land use and transportation strategies will be important to both MPOs and RTPA's in developing their RTPs..."	Comment noted, however suggested change not incorporated as MPOs and RTPAs do currently strive to integrate land use and transportation strategies into their long range planning, such as the development and adoption of regional blueprint plans throughout the state.

60	128	Section 6.25 SCS Development	Autumn Bernstein, Amanda Eaken, Julie Snyder, Liz O'Donoghue	ClimatePlan	Requested that the following language be inserted under the SCS Planning Assumptions sub-section: "The legislative findings for SB 375 recognize that: "greenhouse gas emissions from automobiles and light trucks can be substantially reduced by new vehicle technology and by the increased use of low carbon fuel. However, even taking these measures into account, it will be necessary to achieve significant additional greenhouse gas reductions from changed land use patterns and improved transportation. Without improved land use and transportation policy, California will not be able to achieve the goals of AB 32." (Chapter 728, Statutes of 2008, Section 1(c))"	Based upon discussion of this language at the 1-20-10 Land Use and Housing Meeting, this statement was blended with Chapter 728, Statutes of 2008, Sections 1(c) and (i) and incorporated into the fourth paragraph under SCS Planning Assumptions.
61	128	Section 6.25 SCS Development	Autumn Bernstein, Amanda Eaken, Julie Snyder, Liz O'Donoghue	ClimatePlan	"In addition to the need to plan for GHG emissions reductions, there are many other circumstances that can require the SCS to differ from current general plans. For example, many existing local general plans do not yet reflect changing demographics, market demand, adopted blueprints, habitat conservation plans, or other plans which may more accurately reflect likely future growth patterns. In addition, many existing general plans do not yet include general uses, densities, or land use designations with zoning and development standards that can accommodate the existing RHNA, nor can they accommodate the next RHNA without amendments of land use designations and rezoning. Many local governments have not yet completed a scheduled rezoning program of an adopted general plan or housing element, or their general plans may contain elements that are more than ten years out of date. In certain cases, existing plans may reflect ordinances or policies that directly limit the number of residential building permits. In addition, current plans may be based on outdated assumptions about funding..."	Based upon discussion of this language at the 1-20-10 and 1-26-10 Land Use and Housing Meetings, the first sentence of the suggested language was incorporated into the fifth paragraph under SCS Planning Assumptions. The remainder of the suggested language is captured within the non-exclusive bulleted list on pgs. 128 and 129.
62	128	Section 6.25 SCS Development	Sande George	APA, League of CA Cities, and CSAC	Under the third bullet on p. 128 remove "development standards" as development standards impacts local implementation of the Housing Element, not the SCS, at the regional level.	Comment incorporated, sentence was amended to read: "existing general plans do not yet include land use designations with zoning to accommodate the existing RHNA..."
63	128	Section 6.25 SCS Development	Sande George	APA, League of CA Cities, and CSAC	Under the third bullet on p. 128 revise the last sentence to reflect statute: "...or existing plans reflect ordinances, policies, voter-approved measures, or other standards that directly or indirectly limit the number of building permits where implementation of those ordinances, policies, voter-approved measures, or other standards prevents the jurisdiction from accommodating the RHNA."	Comment incorporated.
64	129	Section 6.25 SCS Development	Amanda Eaken	NRDC	Requested the following language be added to the last paragraph under SCS Planning Assumptions: "The MPO should base its assumptions on the most reasonable forecasts taking into account changing population demographics and market demand over the life of the RTP."	Based upon discussion of this language at the 1-26-10 Land Use and Housing Meeting, it was incorporated into the last paragraph under SCS Planning Assumptions.

65	129	Section 6.25 SCS Development	Julie Snyder	Housing CA	In the second paragraph under the Addressing Housing Needs in the SCS sub-section expand on the phrase "The SCS is required to accommodate the RHNA" to reflect the HLU subcommittee's agreement that the SCS development pattern must not preclude any individual community from accommodating its existing or upcoming RHNA allocation. (HLU members discussed this at the January 13, 2010 meeting and are drafting language to address this issue.)	Based upon discussion of this language at the 1-13-10 and 1-20-10 Land Use and Housing Meetings this paragraph was amended to read: "The SCS shall accommodate the RHNA pursuant to Government Code Section 65584 and consider the state housing goals specified in Government Code Section 65580 and 65581. The development pattern of the SCS shall consider existing residential zoning obligations to accommodate the RHNA of the current housing element planning period as well as residential density implications for the pending RHNA with which the SCS is being coordinated. The SCS development pattern shall not preclude an individual community from accommodating its existing or pending RHNA."
66	129	Section 6.25 SCS Development	David Schonbrunn	TRANSDEF	The 6th item under the non exclusive list which reads 6.) Other reasons identified through consultation with federal, state, and local agencies contradicts the very notion of a non-exclusive list. It clearly is meant to cap an exclusive list. It should be deleted.	Comment noted and based upon discussion in the 1-20-10 and 1-26-10 Land Use and Housing workgroup meetings, item 6 was re-written to read: "The assumption accounts for statutory requirements or other reasons identified through consultation with federal, state, and local agencies."
67	129	Section 6.25 SCS Development	Linda Wheaton	HCD	The following language should be added to the third sentence of the first paragraph under the Addressing Housing Needs in the SCS sub-section: "except for those which must update every four years if they fail to adopt their housing element update within 120 days of the due date pursuant to Government Code Section 65588(e)(4)."	Comment incorporated.
68	130	Section 6.25 SCS Development	Sande George	APA, League of CA Cities, and CSAC	The second sentence of the second paragraph on p. 130 needs to clarify application to cities and counties and should be amended to read: "The Regional Housing Need Allocation (RHNA) process establishes a minimum amount of housing development capacity for each city's and county's housing element."	Comment incorporated.
69	131	Section 6.25 SCS Development	David Schonbrunn	TRANSDEF	In the last paragraph under Best Practices on p. 131 the following verbs should be added to a.) b.) and c.) respectively - identify, provide, and evaluate, in order to more clearly convey the meaning.	Comment incorporated.
70	132	Section 6.25 SCS Development	Autumn Bernstein	ClimatePlan	Requested the following language be added to the Addressing Regional Transportation Needs in the SCS sub-section: "The SCS requirements for an RTP give the region a new organizing principle for establishing transportation priorities for their region: the reduction of greenhouse gas emissions consistent with a CARB assigned target."	Comment noted. The SCS Background sub-section on page 125 addresses the SCS requirement that regions must set a forecasted development pattern for the region that, when integrated with the transportation network, policies, and programs, will reduce regional GHG emissions to meet the ARB assigned regional target.
71	132	Section 6.25 SCS Development	Amanda Eaken	NRDC	Requested that the following bullet be added to the Addressing Regional Transportation Needs in the SCS sub-section: 1.) The MPO should base its assumptions on the most realistic forecasts taking into account changing population demographics and market demand over the life of the RTP.	Comment noted however this language is already included in the SCS Planning Assumptions sub-section on page 129.
72	132	Section 6.25 SCS Development	Amanda Eaken	NRDC	Requested that the following bullets be added to the Addressing Regional Transportation Needs in the SCS sub-section: 1.) Transit investments need supporting levels of land use density and intensity and 2.) Placing land uses closer together and minimizing unnecessary barriers to circulation increases travel choices such that transit, walking, and bicycling become viable while also reducing transportation sector energy use and GHG emissions.	Comment incorporated, suggested bullets added.

73	132	Section 6.25 SCS Development	Amanda Eaken	NRDC	Requested that the following bullet be added to the Addressing Regional Transportation Needs in the SCS sub-section: 1.) The speed of the network and the cost of travel will directly influence the location choices of new development. Reducing GHG emissions may require increasing the cost of travel to dispersed land uses.	Comment incorporated, paraphrased to read: "The speed of the network and the cost of travel may influence the location choices of new development."
74	132	Section 6.25 SCS Development	Amanda Eaken	NRDC	Requested that the following bullet be added to the Addressing Regional Transportation Needs in the SCS sub-section: 1.) The impacts on land development patterns will be different for the expansion of a highway network compared to expansion of a transit network.	Comment noted, however the intent of this suggested bullet is captured in bullets 1.) and 3.) on p. 132 of the Final Draft RTP Guidelines under Addressing Regional Transportation Needs in the SCS.
75	132	Section 6.25 SCS Development	Amanda Eaken	NRDC	Requested that the following bullet be added to the Addressing Regional Transportation Needs in the SCS sub-section: 1.) Induced demand is the phenomenon whereby decreasing the cost of vehicle trips in a particular corridor -- usually by decreasing congestion through a roadway improvement -- induces new vehicle trips in that corridor. Recent evidence points to a new dimension to the relationship between transportation investments and land development: the building of roadways encourages land development as well as new trips from existing land uses. This is "induced demand".	Comment noted however, after consultation with Caltrans Division of Transportation Systems Information, staff determined that at this point in time, additional research findings are needed before including this information in the RTP Guidelines.
76	132	Section 6.25 SCS Development	Amanda Eaken	NRDC	Requested that the following bullet be added to the Addressing Regional Transportation Needs in the SCS sub-section: 1.) Induced demand may consume much of a roadway's added capacity within a few years. Induced demand is added to the system in both the short-term (new trips induced immediately by the reduced congestion, otherwise known as latent demand) and the long-term (trips added from new development that was itself encouraged by the added roadway capacity).	Comment noted however, after consultation with Caltrans Division of Transportation Systems Information, staff determined that at this point in time, additional research findings are needed before including this information in the RTP Guidelines.
77	132	Section 6.25 SCS Development	Richard Lyon	CBIA	Requested deletion of the 6 bullet points outlining priority conservation areas (as outlined on p. 129-130 of the January 5th Draft RTP Guidelines) as Government Code Section 65080(b)(2)(v) clearly stipulates that the SCS must gather and consider information regarding "resource areas" and "farmland" as defined in Government Code Section 65080.01(a) and (b). In place of the bulleted list, a series of internet resources for Regional HCP's, City and County Zoning Ordinances, Open Space Elements, Farmland Mapping and Williamson Act, have been provided to assist MPOs in the requirement to gather and consider the best practically available scientific information.	Comment noted. Based upon comments received, a Joint Subcommittee Meeting was held on 1-28-10 to discuss guidance provided on Addressing Resource Areas and Farmland in the RTP Guidelines. Based upon discussion at the meeting and continued collaboration between key stakeholders, a compromise was reached and the bulleted list was replaced with the statutory definitions of "resource areas" and "farmland".

78	132	Section 6.25 SCS Development	Richard Lyon	CBIA	Requested deletion of the 6 bullet points outlining priority conservation areas (as outlined on p. 129-130 of the January 5th Draft RTP Guidelines) as Government Code Section 65080(b)(2)(v) clearly stipulates that the SCS must gather and consider information regarding "resource areas" and "farmland" as defined in Government Code Section 65080.01(a) and (b). In place of the bulleted list, a series of internet resources for Regional HCP's, City and County Zoning Ordinances, Open Space Elements, Farmland Mapping and Williamson Act, have been provided to assist MPOs in the requirement to gather and consider the best practically available scientific information.	To provide additional guidance to MPOs, the following language was included : "The SCS may include a narrative description, map, data, or other resources (or any combination thereof), developed in consultation with the appropriate resource agencies including cities and counties, which identifies regional resource areas and farmland. As a best practice to comply with the requirements of CA Government Code 65080 (b)(2)(B),MPOs, based on locally and regionally significant considerations, may develop a regional conservation framework that identifies and considers "resource areas" and "farmland" as defined in Government Code Section 65080.01(a) and (b). To demonstrate consideration of resource areas and farmland, the SCS could identify regional priority areas for conservation and mitigation efforts, based upon existing publicly available information and developed in consultation with the appropriate resource agencies including cities and counties." Informational links were included as were links to the SANDAG multi-county HCP and the SACOG Rural Urban Connections Strategy as best practice examples.
79	132	Section 6.25 SCS Development	Liz O'Donoghue	TNC	Requested to add a seventh bullet to the list of priority conservation areas, which reads "Areas essential for maintaining or improving the integrity of watersheds, and for maintaining or improving the water quality and availability in surface water bodies and groundwater tables."	Comment noted, however based upon the general consensus reached by the Resource Areas and Farmland Workgroup, the bulleted list of priority conservation areas was removed and replaced with guidance language and weblinks described above.
80	134	Section 6.25 SCS Development	David Schonbrunn	TRANSDEF	Under the Designing a Forecasted Development Pattern in the SCS subsection on p.134, the second to last sentence in the first paragraph should be amended to read: "In preparing the forecasted development pattern, empirical relationships between land use, transportation, and the resulting GHG emissions shall be considered." According to Government Code Section 14522.1(b) the Guidelines "shall" consider these relationships.	Comment noted, however Government Code Section 14522.1(b) provides a directive to the CTC that the guidelines for travel demand models shall take into account the relationships outlined in 14522.1(b). As this is not a directive to MPOs and there is no mention of GHG emissions within 14522.1(b) the statement was not changed as requested. However, footnotes were added to the Modeling Chapter to indicate how the Guidelines capture the requirements of Section 14522.1(b).
81	134	Section 6.25 SCS Development	Terry Parker	Caltrans Office of Community Planning	The second bullet under Designing a Forecasted Development Pattern in the SCS should be amended to read: "Density and clustering of land uses, typically measured by the number of dwelling units, shops, and/or employees per acre or square mile, floor area ratio (FAR), and other similar measurements."	Comment incorporated.

82	139	Section 6.28 Alternative Planning Strategy Overview	Greg Nord	OCTA	The language at the beginning of Section 6.28 states, consistent with statute, that an APS is required if an MPO's SCS does not meet the reduction targets. Therefore, please consider removing the following language from the January 5th Draft, which is redundant and may restrict a MPO's ability to create an APS: "It may be necessary for an MPO to adopt an APS if the SCS cannot achieve the regional greenhouse gas emission reduction target without: 1. Including improvements to the transportation network that fall outside of current fiscal constraints. 2. Using land use planning assumptions that exceed reasonable assumptions allowed under federal guidelines. 3. Other circumstances that make achieving the regional target within the SCS infeasible."	Comment noted, suggested deletion made.
83	141	Section 6.30 Adaptation of the Regional Transportation System to Climate Change	Richard Lyon	CBIA	Requested that the best practice reference to the BCDC proposed Bay Plan amendment (on p. 137 of the January 5th Draft RTP Guidelines) be removed.	Comment noted, language removed as requested.
84	155	Appendix C Regional Transportation Plan Checklist	Julie Snyder, Parisa Fatehi	Housing CA and Public Advocates	Requested addition of the following Question to p.155 under Consultation/Coordination: Question 2. Was the RTP planning process consistent with Title VI of the Civil Rights Act of 1964 and the Title VI assurance executed by each State under 23 U.S.C. 324 and 29 U.S.C. 794, which ensure that no person shall, on the grounds of race, color, sex, national origin, or physical handicap, be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any program receiving Federal assistance from the United States Department of Transportation? (See Title 23, CFR part 450.316(b)(2).)	The Guidelines currently state in Sections 2.3 and 4.2, that MPOs and RTPAs must comply with the federal civil rights requirement (Title VI of the Civil Rights Act of 1964) during the RTP development process that all people regardless of their race, sexual orientation or income level, be included in the decision making process. Amending the checklist to include this question as requested will require consultation with MPOs and federal transportation partners, and may be addressed during the next RTP Guidelines update.
85	229	Appendix I Land Use and Transportation Strategies to Address Regional GHG Emissions in the RTP	David Schonbrunn	TRANSDEF	The sentence which reads: "Local/State Legislation is required to implement various pricing strategies and should be researched prior to incorporating in the RTP development process" logically follows - not starts - a discussion of pricing.	Comment noted, however the legislative requirement for pricing is an important characteristic that may determine whether or not a region may even consider pricing strategies and therefore also logically begins this discussion.
86	235	Appendix J RHNA and RTP Development Information	Linda Wheaton	HCD	Provided an updated RHNA/Housing Element & RTP Statutory Process Timelines exhibit for Appendix J which reflects amendments made due to SB 575.	Updated table incorporated in Appendix J with slight modification made to provision 11.) regarding the ARB review period based on input from ARB at the 1-26-10 Land Use and Housing Meeting.

87	243	Appendix K Glossary of Transportation Terms	Luree Stetson	California Natural Resources Agency	Appendix K definition of Performance Measures should be modified to include other requirements, the "system" must include natural resources, environment, conservation which are also part of the planning and decision making process. Performance Measures definition could read: Performance measures are indicators of how well the transportation system is performing with regard to such things as average speed, reliability of travel and collision rates, number of natural resources protected, conservation outcomes, etc. They are used as feedback in the transportation planning and decision-making process.	Comment noted, however, transportation system performance measures are directed at measuring specific objectives of the transportation system. The consideration of natural resources in the long range transportation planning process (which is the focus of the RTP Guidelines) are covered under SAFETEA-LU requirements and recommendations for consultation with resource agencies and regional advance mitigation planning. At this point in time, there is no collective consensus regarding transportation system performance measures which integrate natural resource performance measures. This topic will require additional research and transportation industry collaboration.
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