



METROPOLITAN
TRANSPORTATION
COMMISSION

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Memorandum

TO: Planning Committee

DATE: September 5, 2014

FR: Deputy Executive Director, Policy

W.I.: 1121

RE: Draft Guidelines for Countywide Transportation Plans

Background

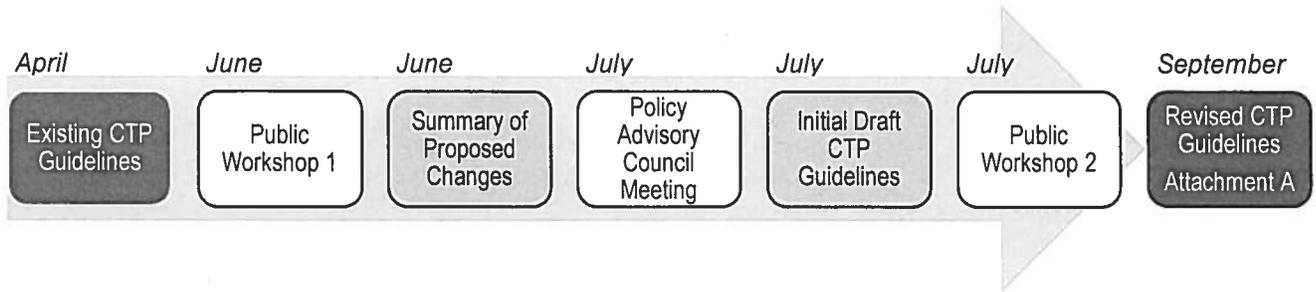
Government Code Section 66531 authorized Bay Area counties to develop Countywide Transportation Plans (CTPs) on a voluntary basis, and directed MTC to develop guidelines to assist CMAs and other appropriate agencies in the development of the CTPs. MTC adopted the original CTP Guidelines in 1989 as MTC Resolution 2120, and last updated the guidelines in 2000. The counties of the Bay Area have different communities, transportation systems, and transportation needs that must be considered in their countywide planning efforts. The CTP Guidelines are intended to:

- Inform the relationship between CTPs and Plan Bay Area while respecting both local needs and regional priorities;
- Assist with the implementation of SB 375 and MAP-21; and
- Identify appropriate content to include in the development of CTPs.

Update Process

At the April Planning Committee, staff presented its approach and schedule to update the CTP Guidelines, and subsequently has engaged partners and stakeholders from the Regional Advisory Working Group (RAWG), the Partnership Technical Advisory Committee (PTAC), and Policy Advisory Council to revise and update the guidelines.

MTC hosted a public workshop to inform the new draft of the guidelines on June 3 in the MTC Auditorium. Staff sent out more than 700 invitations via the RAWG and PTAC distribution lists. Thirty (30) attendees participated in the workshop and four (4) comment letters provided feedback on the existing guidelines and provided new subject matter for the updated draft. Staff presented a summary of the proposed changes to the existing guidelines at the Policy Advisory Council's July 2 meeting. Following the Policy Advisory Council's July meeting, an initial draft of updated CTP Guidelines were presented at public workshops held July 22 and July 24. Fifty (50) representatives of RAWG and/or PTAC attended the workshops, and an additional nine (9) letters were submitted with comments on the initial draft of updated guidelines.



Updated Guidelines

Two key, yet conflicting, comment themes emerged throughout the update process. The first theme expressed an opinion that the CTP Guidelines should be flexible, and in turn CTPs should reflect local priorities and stimulate innovation. The second theme expressed an opinion that the CTP Guidelines should ensure that CTPs conform to Plan Bay Area by aligning various elements of the plan, including the performance targets, equity framework, and public participation process. See Attachment 1 for a copy of the comment letters received.

The updated guidelines strengthen the link to Plan Bay Area by including references and technical information to key elements of the Plan, including public outreach and participation, performance approach and targets, jobs and housing forecasts, and equity emphasis. In addition, the updated guidelines encourage the counties to partner with MTC while developing their CTPs, and in turn, MTC staff will make technical and staff resources available to assist counties while developing their CTPs (e.g., documentation on Plan Bay Area’s equity analysis and its underlying data). Table 1 summarizes proposed staff changes to the current guidelines.

Recommendation

MTC staff recommends that the Committee refer the updated Guidelines for Countywide Transportation Plans, as a revision to Attachment A of MTC Resolution No. 2120, effective for CTPs initiated after October 1, 2014.


Alix Bockelman

Attachments

Attachment 1: Comment Letters Received
MTC Resolution No. 2120, Revised

Table 1
Summary of Changes to CTP Guidelines
(as compared to the 2000 adopted version)

New Content	Section Page
<p>Outreach & Regional Coordination</p> <p>Document the local public engagement process, emphasizing how the needs of minority, low-income, and other disadvantaged communities have been considered. Outreach to under-represented interests, including Native American tribes, and economic, environmental and public health interests is encouraged.</p> <p>The guidelines reference the Plan Bay Area Public Participation Plan and it is listed as a reference in Attachment C of the guidelines.</p>	<p>Section II.A. Page 3</p>
<p>Performance & Targets</p> <p>Performance-driven, outcome-based approach to transportation decision making (as resources permit) emphasizing the Economy, Environment, and Equity. The performance framework:</p> <ul style="list-style-type: none"> a) Should reflect local priorities, but also consider regional targets, including the region's two mandatory targets for per capita carbon dioxide emissions and to house all growth <i>without displacing current low-income residents. (language in italics adopted by MTC and ABAG and not identified in SB375)</i> b) Could include both project and/or investment and land use scenario analysis. <p>The guidelines reference the Plan Bay Area Performance targets which are listed as a reference in Attachment B of the guidelines and the Performance Assessment Report is listed in Attachment C.</p>	<p>Section III.A. Pages 5-6</p>
<p>Investments & Project Lists</p> <p>CTPs provide a basis for transportation improvements and programs considered in PBA. As such, CTPs should include:</p> <ul style="list-style-type: none"> a) Identification of short-, medium-, and long-term improvements and programs; b) Both a financially constrained project list and a 'vision' project list: <ul style="list-style-type: none"> i) indicate the cost of projects in year-of-expenditure dollars, using inflation factors from Plan Bay Area; and, ii) MTC will provide, as a resource, access to the RTP project database. c) Discussion of relevant regional programs. d) Transportation investments that support the forecasted land use in Plan Bay Area, with an emphasis on the Priority Development Areas. <p>The planning processes of Caltrans, transit agencies, and other regional agencies will also provide a basis for transportation improvements and programs considered in the RTP.</p>	<p>Section III.C. Pages 6-7</p>
<p>Equity Analysis</p> <p>Conduct an equity analysis with input from the public, tailored to the specific character of the county, and with a focus on minority, low-income, and other disadvantaged communities.</p> <p>The guidelines reference the Plan Bay Area Equity Analysis and it is listed as a reference in Attachment C of the guidelines.</p>	<p>Section III.E. Pages 7-8</p>

Table 1, continued
Summary of Changes to CTP Guidelines
(as compared to the 2000 adopted version)

New Content	Section Page
<p>Other Plan Elements Include a discussion of:</p> <ol style="list-style-type: none"> a) Local/modal studies conducted by the County(s) or Transit Agencies; b) Corridor studies and relevant recommendations; c) Community Based Transportation Plans (CBTPs); d) PDA Investment & Growth Strategies; e) Active Transportation Plans, Complete Streets and Safe Routes to School efforts; and, f) Climate change impacts to transportation infrastructure. 	Section III.F. Page 8
<p>Update Schedule & Effective Date CTPs should have regular updates (every 4 years), within 18-30 months before/after adoption of the RTP/SCS. CTP Guidelines should be updated every 4 years following PBA adoption. CTP Guidelines are proposed to go into effect for CTPs initiated after October 1, 2014, consistent with federal and state rulemaking processes.</p>	Section IV. Page 8
Updated Content	
<ol style="list-style-type: none"> 1) References to State and Federal law have been updated to reflect current law (e.g., SB 375 and MAP-21). 2) References were updated to reflect the 2010 Clean Air Plan. 	
Removed Content	
<ol style="list-style-type: none"> 1) The guidelines will no longer refer to corridor planning explicitly. 2) There will no longer be a reference to the Metropolitan Transportation System. 3) References to committees or programs that no longer exist have been removed. 4) There will no longer be a reference to the expectation CTPs conduct an environmental analysis though they are still able to do so. CTPs do not need to reference MTC's environmental analysis. 	

Adam Noelting

From: Doug Johnson
Sent: Monday, June 23, 2014 3:19 PM
To: Adam Noelting
Subject: Fwd: CTP Guidelines comments

Begin forwarded message:

From: "Oakes, Cameron@DOT" [REDACTED]
Date: June 17, 2014 at 5:14:39 PM PDT
To: Doug Johnson [REDACTED]
Cc: "Yokoi, Stephen@DOT" [REDACTED]
Subject: CTP Guidelines comments

Hi Doug,

Thanks for the extra time. Not too much to say but here are a couple comments.

1. Section III Countywide Transportation Plan Content
Comment: Title VI/Environmental Justice content seems to be missing from the existing guidelines and should be a consideration in terms of transportation system development. Native American coordination, communities of concern and general socio-economic displacement should also be a consideration within this section.
2. Section III Countywide Transportation Plan Content
Comment: Climate change and associated impacts to transportation infrastructure (ex - sea level rise, storm surge, etc) seems to be missing from the existing guidelines and should be a consideration in terms of adaptation strategy development for the transportation system (existing and planned). General adaptation strategies may include rebuild, relocate and abandon scenarios along with associated benefits and costs of doing so.

Regards,
Cameron

Cameron Oakes, Senior Transportation Planner
District Branch Chief
System Planning East Bay / Santa Clara
510-622-5758
www.dot.ca.gov/dist4/systemplanning

June 10, 2014

TO: Ken Kirkey, MTC Director of Planning

FROM: Robert Macaulay, CMA Planning Directors Chair

SUBJECT: Comments on Development of New MTC Guidelines for Development of County Transportation Plans

The Bay Area Congestion Management Agencies (CMAs) appreciate the opportunity to work with the Metropolitan Transportation Commission (MTC) in developing updated guidelines for the development of Comprehensive Transportation Plans (CTPs). These guidelines are rooted in state congestion management statutes, and are advisory, rather than prescriptive. The guidelines are none-the-less an important tool to help strengthen the relationships between the CMAs and MTC through the development of our respective comprehensive plans.

As has already been stated numerous times, each Bay Area county is unique, and the comprehensive plans adopted by the CMAs need to retain the flexibility to reflect those unique circumstances. One example of this is that most counties have transportation sales tax measures that fund projects and programs that are included in their CTPs, but may not be included in the RTP/SCS. Because of this variety, a wide range of formats and contents in CTPs is to be expected. We do, however, believe the update to the current CTP guidelines should consider the following points, which generally reflect the views of the CMA Planning Directors.

- The CTP guidelines should be based upon the principle that CTPs identify local priorities developed in a regional context. This will help strengthen the relationship between the RTP/SCS and the CTP.
- The idea that CTPs can form the basis of the RTP/SCS should be maintained. This includes not only projects and programs, but also goals and performance standards. The Guidelines should continue to contain standards that are needed for CTP content to be used as a basis for the RTP/SCS.
- CTPs may have differing areas of focus, and may not include all of the RTP/SCS goals as priorities. For example, one community may place a stronger emphasis on Safe Routes to Schools than does the RTP/SCS, and another may wish to use a different definition of Communities of Concern. The Guidelines should acknowledge that a difference in focus between a CTP and the RTP/SCS does not mean that the plans are inconsistent or

incompatible and that, indeed, local implementation of local priorities strengthens the regional transportation network and the plan's public legitimacy.

- CTPs should identify goals, objectives and performance measures. Where those are different than the RTP/SCS goals, objectives and performance measures, the CTP should identify the differences and explain why the local goals, objectives and performance measures are appropriate.
- CTPs should identify where their land use assumptions (specifically, housing number and type, employment number and type, and locations) differ from those of the RTP/SCS.
- The CTP should identify the federal and state legislation under which it was adopted.
- The CTP Guidelines should be updated every 4 years with the RTP update.
- CTPs should generally be updated on a 4-year cycle, off-set from the RTP/SCS cycle. This reflects the nature of the two planning efforts; looking both to the past and the future, interactive with each other, and iterative in nature. CMAs may vary from this cycle in response to local circumstances.
- The CTP should document the local public input process. This includes what outreach processes were used, what input was received, and how the input was used to shape the CTP content. The report should emphasize how the CMA's Title VI obligations have been met
- CTPs should include both a financially constrained project list and a 'vision' project list, since vision projects typically act as candidates for future financially constrained project lists.

The CMAs have a relationship to MTC that is unique, based upon our legislative mandates and contractual obligations. We appreciate the opportunity we have had so far to participate in the Guideline update process, and look forward to continuing that relationship.

cc: CMA Executive Directors

CMA Planning Directors

Adam Noelting

From: [REDACTED]
Sent: Saturday, June 07, 2014 2:06 PM
To: CTP Info
Subject: Fwd: MTC Guidelines for Countywide CMA Transportation Plans

Dear Doug and Adam,

fyi (sent this to Steve Heminger earlier today)

jc

On Jun 7, 2014, at 1:03 PM, [REDACTED] wrote:

Dear Steve,

Strong and effective CMA transportation plans would benefit the Region. The following comments are presented with that objective in mind:

- 1.) There needs to be a nexus between CMA guidelines and capital priority-setting. Otherwise guidelines are of no consequence.
- 2.) Guidelines should refer to, and conform to, federal, State, BAAQMD and MTC VMT-reducing codes and policies. Absent a commitment to VMT reduction, little will change from the VMT-increasing policies and practices of the present.
- 3.) Greater CMA transparency would cut down on the wasteful and sometimes disruptive need for outside groups to resort to multiple FOIA requests.
- 4.) More attention should be paid to the financial feasibility of proposed capital projects.
- 5.) Today's practice of "screening out" viable alternatives and then proceeding only with the "preferred alternative", and a straw man or two ripe for easy toppling, is wasteful and should end.
- 6.) Local politicians and other decision-makers are often insufficiently educated about complicated county and regional transportation issues to respond in wise and far-sighted ways. This needs to change. The Guidelines should encourage professional staffs to step up efforts to help decision-makers better understand the matters before them. If this is done carefully it need not put the professionals in jeopardy.

Jerry Cauthen

June 9, 2014

BY EMAIL: ctp-info@mtc.ca.gov

Steve Heminger
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

Re: MTC Guidelines for CMA Countywide Transportation Plans

Dear Mr. Heminger:

We appreciate the opportunity to provide our input while MTC is in the process of developing a draft of its new Guidelines for long-range Countywide Transportation Plans. By holding a pre-draft public workshop on June 3, and soliciting additional written comments prior to the issuance of a draft, MTC is promoting transparency and inclusiveness in its process, and will ultimately achieve a better outcome.

This level of attention is appropriate given the crucial role of these Guidelines. As your April 4 staff memo noted, they are the vehicle for ensuring the “linkage” of the Countywide Transportation Plans (CTPs) to Plan Bay Area, and for reinforcing the importance of the ongoing “iterative relationship” between the regional and countywide plans. (The iteration between long-range countywide and regional planning is what will move the region closer to meeting our goals: A new set of CTPs must be adopted that build on Plan Bay Area, the current Regional Transportation Plan and Sustainable Communities Strategy. In turn, the next RTP/SCS will build on those CTPs.) The overarching task of the Guidelines is to ensure that the next generation of CTPs will include strategies that demonstrate a “linkage” to Plan Bay Area by promoting its goals.

To serve their purpose, the Guidelines must be firmly anchored in Plan Bay Area’s goals and associated performance measures. Plan Bay Area set high goals for improving health and equity in our region. Yet it was built on the foundation of countywide plans that, in some cases, pre-dated SB 375 and, as a result, did not achieve several of its goals. At stake in these Guidelines, then, is nothing less than whether our next regional plan will be able to achieve all of its important goals and performance measures.

In our April 21 letter, we expressed our support for key areas that your April 4 staff report mentioned as subjects for the CTP Guidelines, including (1) the CMA public participation process; (2) consistency with regional goals, objectives, investments and policies, and performance measures linked to Plan Bay Area, (3) the timeframe of proposed projects and programs (near-term, medium-term and long-term), and (4) land use linkage to Plan Bay Area. We also noted two additional important areas that we hope to see addressed: Title VI/Environmental Justice, and the date by which CMA plans will need to be updated in order to be considered in the next iteration of Plan Bay Area.

We write now to offer four major recommendations about the content of the Guidelines as it relates to these issues. The common thread that runs through all of our four is the linkage of the CTPs to the goals and performance measures of Plan Bay Area.

As shown in Attachment 1, each of Plan Bay Area's goals and associated performance measures is tied to a range of specific strategies that would promote and implement it. For instance, the Plan's Climate Protection goal will be promoted by strategies that increase transit ridership, such as fare reductions and affordable TOD housing, and its Healthy and Safe Communities goal by strategies that reduce chronic disease through increased opportunities for active transportation. Other strategies, on the contrary, would move the needle in the wrong direction by, for instance, increasing per capita GHG emissions or reducing non-auto mode share.

To ensure the strong alignment of CTP actions and investments with the promotion of Plan Bay Area's goals, so that our region has all the tools for complete success in the next RTP/SCS, we offer these four recommendations. The CTP Guidelines should guide the Congestion Management Agencies to:

- 1. Demonstrate consistency of the CTP with Plan Bay Area.**
- 2. Identify short-term priorities in the CTP, and ensure that all communities and populations share fairly in their benefits.**
- 3. Explicitly link CTP transportation investments to support of an equitable transit-oriented land-use pattern.**
- 4. Ensure that there is no break in the chain of iteration.**

Some specifics about each recommendation are provided in Attachment 2.

Thank you again for taking this first important step toward adopting a regional plan in 2017 that meets and exceeds all of the region's high aspirations and measures of success.

Sincerely,

Miya Yoshitani, Executive Director
Asian Pacific Environmental Network (APEN)

Anthony Panarese, Organizing Director
Association of Californians for Community Empowerment (ACCE)

Kevin Kosik, Executive Director, Greater Bay Area
American Lung Association in California

Carl Anthony and Paloma Pavel
Breakthrough Communities

William A. Nack, Business Manager
Building and Construction Trades Council of San Mateo County, AFL-CIO

Matt Schwartz, President
California Housing Partnership Corporation

Wendy Alfsen, Executive Director
California WALKS

Dawn Phillips, Co-Director of Programs
Causa Justa :: Just Cause

Tim Frank, Director
Center for Sustainable Neighborhoods

Nikki Fortunato Bas, Executive Director
East Bay Alliance for a Sustainable Economy (EBASE)

Jeffrey P. Levin, Policy Director
East Bay Housing Organizations

John Claassen, Chair, Leadership Council
Genesis

Matt Vander Sluis, Program Director
Greenbelt Alliance

Joshua S. Hugg, Program Manager
Housing Leadership Council of San Mateo County

Dave Coury, Chair
Marin ACE Housing Committee

Liz O'Donoghue, Director of Infrastructure and Land Use
The Nature Conservancy

Myesha Williams, Co-Director
New Voices Are Rising

Dianne Spaulding, Executive Director
Non-Profit Housing Association of Northern California

Leticia Romero, President
North Bay Organizing Project

Gerry La Londe-Berg, Chair
North Bay Organizing Project - Transit Riders United (TRU)

Chione Flegal, Senior Associate
PolicyLink

Richard Marcantonio, Managing Attorney
Public Advocates Inc.

Michael Rawson, Director
Public Interest Law Project

Azibuike Akaba, Environmental Policy Analyst
Regional Asthma Management and Prevention (RAMP)

Jill Ratner, President
Rose Foundation for Communities & the Environment

Marty Martinez, Northern California Regional Policy Manager
Safe Routes to School National Partnership

Rev. Kirsten Snow Spalding, Executive Director
San Mateo County Union Community Alliance

Bob Planthold
SF Bay Walks

Ben Field, Executive Officer
South Bay Labor Council

Clarrissa Cabansagan, Community Planner
TransForm

David Schonbrunn, President
Transportation Solutions Defense and Education Fund (TRANSDEF)

Ellen Wu, Executive Director
Urban Habitat

Derecka Mehrens, Executive Director
Working Partnerships USA

Cc: Alix Bockelman, Ken Kirkey, Doug Johnson
CMA Planning Directors

**Attachment 1:
Plan Bay Area Goals and Performance Measures
Linked to CTP Strategies**

Plan Bay Area Goal and Performance Measure:	Examples of CTP policies, programs and projects that promote this PBA Goal:
<p>1. Climate Protection: Reduce per-capita CO2 emissions from cars and light-duty trucks by 15 percent (Statutory requirement is for year 2035, per SB 375).</p>	<ul style="list-style-type: none"> • Increased transit service levels • Reduced transit fares • Affordable TOD housing • Strategies to mitigate displacement risk, particularly in PDAs and neighborhoods surrounding proposed transportation investments • Programs that provide Safe Routes to School and Complete Streets • Increased opportunities for active transportation • Implement HOT lanes without expanding the existing highway footprint, putting net revenues to transit operations
<p>2. Adequate Housing: House 100 percent of the region’s projected growth (from a 2010 baseline year) by income level (very-low, low, moderate, above-moderate) without displacing current low-income residents (Statutory requirement, per SB 375).</p>	<ul style="list-style-type: none"> • A strong framework for future PDA Growth and Investment Plans that promote affordable TOD housing in PDAs • Incentives for local jurisdictions to designate PDA-like locations for housing growth near jobs and transit
<p>3. Healthy and Safe Communities:</p> <ul style="list-style-type: none"> • Reduce premature deaths from exposure to particulate emissions: <ul style="list-style-type: none"> >Reduce premature deaths from exposure to fine particulates (PM2.5) by 10 percent >Reduce coarse particulate emissions (PM10) by 30 percent >Achieve greater reductions in highly impacted areas • Reduce by 50 percent the number of injuries and fatalities from all collisions (including bike and pedestrian) • Increase the average daily time walking or biking per person for transportation by 70 percent (for an average of 15 minutes per person per day) 	<ul style="list-style-type: none"> • Reductions in chronic disease from air pollution exposures • Reductions in chronic disease by promoting transportation-related physical activity, including active transportation opportunities • Reductions in injuries and fatalities through programs that provide Safe Routes to School and Complete Streets

<p>4. Open Space and Agricultural Preservation: Direct all non-agricultural development within the urban footprint (existing urban development and urban growth boundaries) (Note: Baseline year is 2010.)</p>	<ul style="list-style-type: none"> • Promoting infill development near jobs, particularly in PDAs and PDA-like places • Locating new and expanded transportation facilities in existing urban areas • Addressing agricultural workforce housing needs near agricultural jobs • Investing in conservation of natural and agricultural lands, especially Priority Conservation Areas
<p>5. Equitable Access: Decrease by 10 percentage points (to 56 percent, from 66 percent) the share of low-income and lower-middle income residents' household income consumed by transportation and housing.</p>	<ul style="list-style-type: none"> • Increased transit service levels • Reduced transit fares • Affordable TOD housing • Strategies to mitigate displacement risk, particularly in PDAs and in neighborhoods surrounding proposed transportation investments
<p>6. Economic Vitality: Increase gross regional product (GRP) by 110 percent — an average annual growth rate of approximately 2 percent (in current dollars)</p>	<p>Strategies that:</p> <ul style="list-style-type: none"> • Connect residents at all income levels to living-wage jobs • Create and retain middle wage jobs • Provide affordable transit and housing opportunities near low-wage job clusters • Ensure that the construction and operating jobs created by all development, transportation and infrastructure projects pay area standard wages and benefits to workers
<p>7. Transportation System Effectiveness:</p> <ul style="list-style-type: none"> • Increase non-auto mode share by 10 percentage points (to 26 percent of trips) • Decrease automobile vehicle miles traveled per capita by 10 percent <p>>Maintain the transportation system in a state of good repair:</p> <ul style="list-style-type: none"> • Increase local road pavement condition index (PCI) to 75 or better • Decrease distressed lane-miles of state highways to less than 10 percent of total lane-miles • Reduce share of transit assets past their useful life to 0 percent (Note: Baseline year is 2012.) 	<ul style="list-style-type: none"> • Increased transit service levels • Reduced transit fares • Affordable TOD housing • Strategies to mitigate displacement risk, particularly in PDAs and in neighborhoods surrounding proposed transportation investments • Implement HOT lanes without expanding the existing highway footprint, putting net revenues to transit operations

**Attachment 2:
Detailed Recommendations and Rationale
For CTP Guideline Content**

1. Demonstrate consistency of the CTP with Plan Bay Area.

This recommendation will ensure that CTPs expressly consider regional goals, investments and policies, and performance measures linked to Plan Bay Area, and that CTP programs and projects will promote regional objectives. To that end, the Guidelines should:

- Define “consistency.” For instance: A CTP goal, policy, program or project is “consistent” with Plan Bay Area if it significantly promotes achievement of one or more PBA goals and performance measures, without significantly impeding the achievement of any other PBA goal or performance measure.
- Require the CTP to assess the consistency of each of its goals, and its major programs, projects and policies, with PBA’s goals and performance measures.
- Require the CTP to assess the extent to which project and program alternatives would promote PBA goals and performance measures, and to select and prioritize among them on that basis.
- Require the CTP to demonstrate that it promotes each goal and performance measure in PBA, and does not impede the achievement of any PBA goal or performance measure.
- Require the CTP to consider and adopt strategies, including those in Attachment 1, that directly promote Plan Bay Area goals and performance measures.

2. Identify short-term priorities in the CTP, and ensure that all communities and populations share fairly in their benefits.

Title VI and Environmental Justice requirements ensure that low-income and minority populations will share fairly – and without delay – in the benefits (and burdens) of public policy and investment. Identifying short-term CTP priorities will help ensure that EJ populations will share in the benefits and burdens of the regional plan in a fair and timely basis. Identification of short-, medium- and long-term timeframes in the CTPs will also facilitate regional planning, as the RTP must stage its projects in order to demonstrate fiscal constraint in “year of expenditure” dollars. Accordingly, the Guidelines should:

- Define short-, medium- and long-term. E.g., “short-term” means that implementation is expected to occur within five years of CTP adoption.
- Require the CTP to separately identify its short-term priorities.
- Require the CMA to conduct (with the inclusive participation of EJ community members) an appropriate Title VI and Environmental Justice analysis to ensure that low-income and minority communities and populations will share fairly in the benefits of proposed CTP investments and actions, both

in the short-term and overall, while not bearing an undue share of burdens (including displacement and public health impacts).

- Require the CTP to demonstrate that, taken as a whole, its short-term investments and actions will promote each goal and performance measure of Plan Bay Area, without impeding the achievement of any of them.

3. Explicitly link CTP transportation investments to support of an equitable transit-oriented land-use pattern.

The hallmark of regional planning under SB 375 is concretely tying transportation investments to land-uses that promote the creation of job and housing opportunities. Plan Bay Area took important steps to make those ties, such as in its OneBayArea Grant program. Strengthening those ties in the next regional plan will require a stronger foundation of local actions. To promote that foundation, the Guidelines should:

- Require CTPs to include incentives for local jurisdictions that have designated, or agree to designate, transit-oriented (“PDA-like”) locations for housing growth, by tying transportation investment to local land-use provisions that promote transit ridership and affordable housing near jobs.
- Require CTPs to include both an analysis of the effectiveness of the CMA’s first PDA Investment and Growth Strategy, and a program for increasing its effectiveness in the future, including an analysis of local affordable housing production, and of the extent to which local displacement risk has been mitigated.

4. Ensure that there is no break in the chain of iteration.

Finally, the important purposes of the Guidelines will not be served if any CMA does not conduct a timely update of its CTP in accordance with the Guidelines. If there is a breakdown in the iterative chain in any county, the linkage of the CTPs to Plan Bay Area will be compromised, with impacts on the ability of our next regional plan to achieve its goals. To prevent a breakdown in the iterative process, the Guidelines should:

- Require adoption of updated CTPs, consistent with the new Guidelines and with Plan Bay Area, by a fixed date.
- Provide appropriate RTP incentives, such as streamlined review of projects and programs included in an updated and consistent CTP to the extent that they have been fully assessed and vetted, in an inclusive and participatory CTP process, for their promotion of Plan Bay Area goals and performance measures, their equity, and their cost-effectiveness.
- Provide appropriate RTP consequences for CMA projects and programs not included in an updated and consistent CTP, such as reduced eligibility for regional funds (e.g., funds under the OneBayArea Grant program).



Commission Chair
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Supervisor Keith Carson, District 5

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Councilmember Michael Gregory

City of Union City
Mayor Carol Dutra-Vernaci

Executive Director
Arthur L. Dao

August 13, 2014

Steve Heminger
Executive Director
Metropolitan Transportation Commission
101 8th Street
Oakland, CA 94607

Subject: Update to the Guidelines for Countywide Transportation Plans

Dear Mr. Heminger,

Alameda County Transportation Commission (Alameda CTC) commends the transparent and inclusive process that the Metropolitan Transportation Commission (MTC) has used to engage partners in updating the Countywide Transportation Plan (CTP) Guidelines during the summer of 2014. We appreciate the opportunity to participate in the CTP Guidelines update process.

The following are Alameda CTC's comments on the draft Guidelines, dated July 16, 2014, and are supplemental to the comments letter dated August 12, 2014 from the nine Bay Area CMA Executive Directors:

- **Flexibility supports innovation:** Alameda CTC supports the CTP performance framework (Section III. A Performance & Targets) identified in the draft guidelines, particularly where it notes that the framework is to be reflective of the local priorities while considering regional goals and targets. Considering the diversity of the region, flexibility in establishing goals and targets that are sensitive to local priorities and needs while considering and consulting with MTC on the regional goals and targets is critical for an effective and successful CTP for each county. Furthermore, this flexibility provides the basis for creativity and innovation in the process of responding to the local needs, as demonstrated in the past. We have seen that county-level initiatives first included in the CTP, that were responding to the local issues in the past, later became part of the RTP as a result of their success. Some of these examples include Safe Routes to School and Senior Mobility programs as well as managed lanes and integrated corridor mobility projects.

- **Vision:** Alameda CTC supports the draft guidelines regarding CTP Investments and Projects lists (Section III.C Investments & Project Lists) including the Vision projects list. This section requests that CTPs "demonstrate" differences with the RTP. Alameda CTC seeks clarification of what "demonstrate" means in this context and suggests using the word "document" in its place. We also note that, depending on the timing of the development of a CTP in relation to the RTP, this documentation may not be able to occur. For example, Alameda

CTC adopted its 2012 CTP prior to the adoption of the 2013 RTP and therefore, would not have been able to reference differences in the vision section since the RTP did not include a vision section. Alameda CTC seeks clarification on whether the demonstration of differences will apply to the vision section and if MTC is anticipating including a vision component in future RTP updates.

- Alameda CTC encourages the reintroduction of a vision section for future RTP updates that will incorporate all the vision elements from CTPs to enable assessment of long-term planning needs.
- **Operation and Maintenance Needs:** Similar to above, within the same section under the “remaining needs for maintaining and operating the transportation system” where the CTP is to include a description of these needs, Alameda CTC recommends that this be done in coordination with MTC, particularly for costs associated with transit operators that cross county lines, such as BART and AC Transit. In addition, it is not clear in this section whether documentation of the remaining needs is also intended to document funding sources, in a manner similar to how project needs are to be addressed. If so, this also should be done in consultation with MTC since many of the Operations and Maintenance (O&M) needs and sources for the multimodal transportation system are addressed at the RTP level. We recommend that Section III.C Investments & Project Lists of the guidelines be appropriately modified to reflect this.
- **New Revenue Sources:** The Alameda CTC’s CTP typically includes a discussion of potential new revenue sources. Alameda CTC recommends that the CTP guidelines indicate that this should be done in coordination with MTC, particularly since some new funding sources, such as Cap & Trade or potential funds from a new surface transportation bill may be administered at the regional or state level, and therefore, coordination and collaboration would be necessary to identify estimated county shares. In addition, local sales tax measures that pass at a county level will be included and will address how they meet local needs to fulfill local accountability to voters. We recommend that Section III.D Revenue Forecasts & Financial Considerations be appropriately modified to reflect coordination on new revenue sources.

Again, thank you for the opportunity to participate in this process and to provide comments. We look forward to continued collaboration with MTC on the CTP guidelines update. If you or your staff have any questions or comments, please do not hesitate to contact me at (510) 208-7428 or Saravana Suthanthira at (510) 208 7426.

Sincerely,



Tess Lengyel
Deputy Director of Planning and Policy

cc:
Arthur Dao, Alameda CTC
Ken Kirkey, MTC
Doug Johnson, MTC

August 13, 2014

BY EMAIL: ctp-info@mtc.ca.gov
Steve Heminger, Executive Director
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

Re: MTC Guidelines for Countywide Transportation Plans

Dear Mr. Heminger:

Following up on our joint letter of June 9 (attached), we write to share our comments on MTC's July 16 Draft Guidelines for Countywide Transportation Plans. We welcomed the opportunity to participate in the two July workshops, and are pleased that the Draft Guidelines include mention of the need for consistency between Countywide Transportation Plans (CTPs) and the RTP; suggest that CTPs should consider a performance-driven, outcome-based approach to transportation decision making, and refer to alternative land use scenarios and priority development areas (PDAs).

These provisions offer a good starting point, but do not go far enough to ensure that the nine county plans that will become the primary basis of our next RTP will be consistent with Plan Bay Area and promote its goals and performance measures. SB 375 worked fundamental changes in regional planning and Plan Bay Area's triple-bottom line goals emphasize the promotion of shared economic prosperity, public health, environmental sustainability, and social equity. The overall framework of the Draft Guidelines should better reflect those changes with stronger provisions to promote the goals and performance measures of Plan Bay Area by wisely spending CMA transportation dollars to advance equitable land use outcomes.

The need for strong and clear guidance on performance-based planning was evident in the workshop discussions that many of us took part in with your staff and representatives of the Congestion Management Agencies. In some counties, it appears that transportation planning is almost entirely disconnected from the goals and performance measures of PBA. In fact, a few counties appear to prepare project lists with no connection to any goals or performance measures at all.

A few changes to the Draft Guidelines are especially important in this regard:

1. **Consistency with Plan Bay Area's goals and performance measures.** While we appreciate the statement in the Draft Guidelines that "CTP's should consider a performance-driven, outcome-based approach to transportation decision making (as resources permit) emphasizing the Economy, Environment, and Equity" and should "[c]onsider regional goals and targets," the Guidelines do not even reference Plan Bay Area's performance measures, much less require the CTPs to help achieve them. Whether the next RTP/SCS will meet all those goals will depend in large part on whether each CTP moves the needle in the right direction. It is also important that two of Plan Bay Area's goals – reducing greenhouse gas emissions and meeting

the regional housing need at all income levels – are mandated by SB 375 itself. Yet the Draft Guidelines do not even mention “vehicle miles traveled,” “greenhouse gas” or “housing.”

2. **CMA public participation.** We appreciate the statement in the Draft that reference broad outreach, and a requirement to “Document the local public input process, emphasizing how the needs of minority, low-income, and other disadvantaged communities have been considered.” The Draft, however, does not refer to MTC’s Public Participation Plan or incorporate elements of that Plan. This would be a step backwards from the requirement in MTC’s 2011 “Call for Projects” that stated explicitly: “CMAs will be expected to implement their public outreach efforts in a manner consistent with MTC’s Public Participation Plan,” and provided specific guidance in that regard.

3. **Ensure that all populations share fairly in the benefits and burdens.** We applaud the inclusion in the Draft Guidelines of a provision that encourages CMAs to prepare “an equity analysis with input from the public, ... with a focus on minority, low-income, and other underserved communities.” This provision should be strengthened with language to focus CMA equity analyses on ensuring that minority residents and communities will both share fairly in the benefits of the CTP and not bear an unfair share of any burdens it creates.

4. **Linking transportation investments to an equitable transit-oriented land-use pattern.** The Draft Guidelines do not even mention transit-oriented development. While they suggest that CTP’s “reference and include a discussion of” PDA Investment and Growth strategies, more specific guidance is needed to promote an equitable link between transportation investments and land use planning, particularly as concerns PDAs. In addition, the CTP’s should also reference and include a discussion of Priority Conservation Areas.

5. **Due date for adopting updated CTPs.** The Draft does not set a due date, but only states that CTPs should be updated “within 18-30 months (before or after) of adoption of the RTP/SCS.” The due date should be at least 24 months before the adoption of the next RTP/SCS, or July 2015, rather than up to 30 months after July 2013 (which would be as late as January 2016, too late for a CTP to be considered in developing the next RTP). And sticks and carrots should be included to incentive CMAs to adopt timely CTPs that promote Plan Bay Area’s goals and performance measures.

The specific changes we are suggesting are summarized in Attachment 1.

With a new emphasis on coordinating land use and transportation planning for the purpose of reducing GHG emissions and improving health outcomes, particularly in our most disadvantaged communities, the Guidelines provide MTC with an opportunity to bring bold leadership and vision to regional and countywide planning and coordination. With these revisions, and those we suggested in our June 9 letter, MTC can ensure that CTPs will effectively promote the goals of Plan Bay Area.

Sincerely,

Miya Yoshitani, Executive Director
Asian Pacific Environmental Network (APEN)

Anthony Panarese, Organizing Director
Association of Californians for Community Empowerment (ACCE)

Carl Anthony and Paloma Pavel
Breakthrough Communities

Wendy Alfsen, Executive Director
California WALKS

Dawn Phillips, Co-Director of Programs
Causa Justa :: Just Cause

Tim Frank, Director
Center for Sustainable Neighborhoods

Jeffrey P. Levin, Policy Director
East Bay Housing Organizations

John Claassen, Chair, Leadership Council
Genesis

Kevin Kosik, Executive Director
Greater Bay Area American Lung Association in California

Matt Vander Sluis, Program Director
Greenbelt Alliance

Joshua S. Hugg, Program Manager
Housing Leadership Council of San Mateo County

Liz O'Donoghue, Director of Infrastructure and Land Use
The Nature Conservancy

Jill Ratner, Director
New Voices Are Rising

Leticia Romero, President
North Bay Organizing Project

Richard Marcantonio, Managing Attorney
Public Advocates Inc.

Michael Rawson, Director
Public Interest Law Project

Tim Little, Executive Director
Rose Foundation for Communities and the Environment

Marty Martinez, Northern California Regional Policy Manager
Safe Routes to School National Partnership

Rev. Kirsten Snow Spalding, Executive Director
San Mateo County Union Community Alliance

Clarrissa Cabansagan, Community Planner
TransForm

Ellen Wu, Executive Director
Urban Habitat

Derecka Mehrens, Executive Director
Working Partnerships USA

Encl. (June 9 comment letter)

Attachment 1: Specific Revisions Proposed to the Draft Guidelines

1. **Consistency with Plan Bay Area's goals and performance measures.**
 - Include verbatim the goals, performance measures, and equity performance measures of Plan Bay Area.
 - Amend the provisions on p. 5 (under heading III.A., Performance & Targets) to read: “CTP's should ~~consider~~ incorporate Plan Bay Area's a goals and performance measures into a performance-driven, outcome-based approach to transportation decision making (as resources permit) emphasizing the Economy, Environment, and Equity, and paying special attention to the requirements of SB 375 relating to GHG-reduction and housing production targets.”
2. **CMA public participation.**
 - Amend the provisions on p. 2 (under heading II.A., Outreach & Regional Coordination) to add a statement that “CMAs will be expected to implement their public outreach efforts in a manner consistent with MTC's Public Participation Plan,” and indicate that “MTC will make available, to the extent possible, its public engagement resources.”
3. **Ensure that all populations share fairly in the benefits and burdens.**
 - Amend the provisions on p. 6 (under heading III.E., Equity Analysis) to read: “MTC recommends that counties conduct an equity analysis with input from the public, ... with a focus on determining whether minority, low-income, and other underserved communities will share in a fair and timely manner in the benefits of the CTP's programs and projects, and will not bear an unfair share of the burdens of the CTP.”
4. **Linking transportation investments to an equitable transit-oriented land-use pattern.**
 - Include a provision that encourages CTPs to include incentives for local jurisdictions that have designated, or agree to designate, transit-oriented (“PDA-like”) locations for housing growth, by tying transportation investment to local land-use provisions that promote transit ridership and affordable housing near jobs.
 - Include a provision that encourages CTPs to include both an analysis of the effectiveness of the CMA's first PDA Investment and Growth Strategy, and a program for increasing its effectiveness in the future, including an analysis of local affordable housing production, and of the extent to which local displacement risk has been mitigated.
5. **Due date for adopting updated CTPs.**
 - Amend the provisions on p. 7 (under heading IV., CTP Updates) to read: “In order to promote the iterative relationship between CTPs and the RTP, MTC recommends that CTPs be regularly updated and adopted within 18-30 months (before or after) of adoption of the RTP/SCS. As such, MTC recommends that the CTP Guidelines should be updated following RTP/SCS adoption. To be considered in the next RTP/SCS, which will be adopted in mid-2017, CTPs should be adopted and submitted to MTC no later than July 1, 2015.”

WILLIAM B. WALKER, M.D.
HEALTH SERVICES DIRECTOR

WENDEL BRUNNER, M.D.
PUBLIC HEALTH DIRECTOR



**CONTRA COSTA
PUBLIC HEALTH**
COMMUNITY WELLNESS &
PREVENTION PROGRAM
597 CENTER AVENUE, SUITE 125
MARTINEZ, CALIFORNIA 94553
PH (925) 313-6808
FAX (925) 313-6840

Subject: MTC's Countywide Transportation Plan Guidelines

To: Martin Engelmann

From: Wendel Brunner, M.D.

CC: Supervisor Federal Glover, Supervisor Karen Mitchoff

Date: July 2, 2014

Contra Costa County Health Services is currently engaged with MTC as they update their Countywide Transportation Plan Guidelines. As the authorized Health Department for the County and incorporated cities, we would like to offer our suggestions for how CCTA can improve health through the Countywide Transportation Plan.

Contra Costa County Health Services has long recognized the link between land use and transportation investments and community health. As we are sure you are aware, careful planning can encourage residents to get daily exercise through active transportation, enhance affordable access to essential destinations, reduce injuries, asthma and other chronic diseases, and provide housing for all income levels. Thoughtful consideration of equity in planning decisions can also help to reduce the disparate health outcomes we see in the County. Contra Costa County Health Services has a strong record of planning and policy-making to achieve these goals. Collaborating with the County and individual cities within our jurisdiction, we have participated in the development of a number of innovative general plan elements, bike and pedestrian plans, and weighed in on the region's RTP/SCS and Contra Costa's Measure C.

We see Plan Bay Area, and CCTA's actions to implement it, as strong steps towards healthy planning. More specifically, Plan Bay Area explicitly considers health in its goals, outcomes and performance targets; supports transit and active transportation; and links transportation, land use and housing patterns. Additionally, it provides an example of strong public participation and equity analysis transportation planning.

CCTA has a reputation for exceptional planning and project financing & delivery. More recently, CCTA has also taken leadership in promoting healthy transportation and land use planning. We thank you for including a CCHS representative on CCTA's PDA Working Group, and for your robust PDA Growth and Investment Strategy and OBAG criteria. Additionally, your active support for integrated management and operation of an intermodal system, including bicycle/pedestrian facilities, is commendable and can serve as a model for other CMAs.

We are committed to supporting CCTA's continued leadership in healthy county and regional planning, particularly as you step into new duties and responsibilities. We are aware that CCTA is in the process of drafting the Countywide Transportation Plan, and that MTC is concurrently developing guidelines for this plan with CCTA's input. As both of these processes unfold, we encourage you to ensure that our County is on the forefront of innovative and healthy planning. More specifically, we encourage CCTA to take actions, and support guidelines, that:

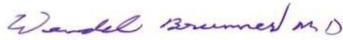
- Promote consistency between Plan Bay Area and our Countywide Transportation Plan. Specifically, ensure that the Countywide Transportation Plan incorporates the goals, objectives and performance measures of the regional plan.



■ Contra Costa Community Substance Abuse Services ■ Contra Costa Emergency Medical Services ■ Contra Costa Environmental Health ■ Contra Costa Health Plan ■
■ Contra Costa Hazardous Materials Programs ■ Contra Costa Mental Health ■ Contra Costa Public Health ■ Contra Costa Regional Medical Center ■ Contra Costa Health Centers ■

- Align the Countywide Transportation Plan with affordable transit-oriented land use goals.
- Ensure robust public participation in the Countywide Transportation Plan.
- Require the use of health metrics and equity analyses in the Countywide Transportation Plan—including a robust evaluation of the air quality impacts of transportation facilities and guidance to local jurisdictions about proper planning/mitigation for adjacent sensitive land uses.

We thank you for your consideration. Please let us know if you have any questions or any ways we can help to support your work and forward healthy planning in our County and region.



Wendel Brunner, MD
Director of Public Health
Contra Costa Health Services



8/13/14 xc: SHeminger / ABockelman /
DJohnson / ANolting
Original to KKirkey

August 12, 2014

Jim Spering, Chairman
Metropolitan Transportation Commission Planning Committee
101 Eighth Street
Oakland CA 94607-4700

RE: CMA Comments on the Regional Transportation Plan (RTP)

Dear Mr. Spering,

The nine Bay Area Congestion Management Agencies (CMAs) appreciate the work that MTC is doing to update its CMAs countywide transportation plan (CTP) Guidelines. Because the CMAs are charged with preparing and implementing these CTPs, the preparation Guidelines are of great interest to us.

First of all, we wish to thank MTC for conducting an inclusive, open, and timely process. The schedule, from initiation to anticipated completion of the Guidelines update, is less than six months. During that time, MTC has held public meetings with the Partnership Technical Advisory Committee, the Regional Advisory Working Group, the MTC Policy Advisory Committee, and this Committee. In addition, MTC has met with those responsible for developing and implementing CTPs - the Planning staffs of the CMAs. This process has allowed MTC to hear a wide variety of perspectives to inform the new Guidelines.

The CMA's wish to bring the following points to the Committee's attention regarding modifications to those guidelines. These points are based on the draft Guidelines released by MTC on July 16, 2014.

The discussion over the CTP guidelines should be premised on them truly providing guidance for counties rather than mandatory requirements. While MTC has indicated it cannot require CMAs to adhere to guidelines and has emphasized the importance of local discretion in each county's CTP, the CMAs are still concerned that the Guidelines may eventually be a condition for regional funding. Currently, CTPs are a voluntary undertaking. The final Guidelines should contain a statement that CMA receipt of funding from MTC is not conditioned upon CMA adherence to the Guidelines.

CTPs are serving both local and regional needs and even a "minor update" represents a significant investment of staff and financial resources to be done well. We do not doubt that the CMAs will try to adhere to the Guidelines in spirit – and many of the CTPs already do. However, the level of effort to prepare CTPs, staff and resource constraints, and local priorities will affect the timing, frequency and focus of CTP updates. For instance, the Guidelines recommend that CTPs are regularly updated and adopted within



Page 2 of 4

CMA Letter (dated August 12, 2014) to MTC Commissioner Jim Spering
RE: CMA Comments on the Regional Transportation Plan (RTP)

18-30 months (before or after) adoption of the RTP/SCS. We appreciate the benefits of this update schedule, but recognize that local considerations and constraints (such as staff and resource limitations or the local decision to target a particular election cycle for a new revenue measure) may drive the schedule for CTP updates. The timing of CTP updates must therefore be flexible to address local policies and resource constraints. It should also be recognized that the preparation and update of CTPs are often tied to local sales tax or other revenue measures which are subject to their own local requirements, goals, and priorities. Finally, we request MTC work with county CMA's in identifying revenues to conduct this planning effort, including making regional funding available.

With respect to data collection and performance targets, CMAs recognize the importance of addressing the three E's (Economy, Equity, and Environment), however the CTPs should not be required to provide analysis beyond that of the RTP. In some cases the Guidelines recommend that the CTPs go beyond the level of detail provided in Plan Bay Area. For instance, the proposed Guidelines suggest the CTPs should also include information on environmental mitigation activities, account for sea level rise, and provide detailed funding plans by source for each project, none of which was included in Plan Bay Area. The Guidelines should make it clear that these are suggested areas for consideration. This doesn't preclude the CMAs from including additional information, including information on areas of special concern to each CMA. It also acknowledges that for some areas (such as sea level rise) the CMAs and the region as a whole are still establishing a baseline of information and there may not be much information that is readily available for incorporation into a CTP in a meaningful way or the staff resources to fully address the issue.

We suggest that MTC allow CMAs to use alternate revenue forecasts and inflation factors as long as the revised assumptions are explained. MTC forecasts for future regional, state, and federal funding are a great resource and appropriate for CTPs to consider. Allowing a CMA to adopt an alternate set of assumptions would help temper the uncertainty inherent in these forecasts, allowing the CMA to update them to reflect changes in local and national economic trends and changes to funding programs such as the anticipation of new local revenue measures.

CTPs that are initiated before October 1, 2014 should be grandfathered into the current guidelines until after the next RTP is adopted. Although the guidelines are by nature optional, there is still an expectation regarding structure and content built into their adoption. Many current CTPs are being updated, but were initially created under the existing guidelines. The October 1 date is impractical because reopening the planning process for the CTPs currently near completion would be too cumbersome without additional financial resources and may extend the deadline for CTP approval, which may not be compatible with local priorities established for that update (e.g. targeting approval to inform a potential ballot measure).

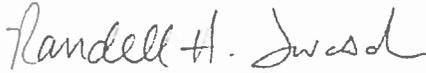
CMA Letter (dated August 12, 2014) to MTC Commissioner Jim Spering
RE: CMA Comments on the Regional Transportation Plan (RTP)

We look forward to working with you as the July 16 draft Guidelines and revisions are brought to this Committee for consideration before going to the full Commission for adoption. We also look forward to continuing our on-going partnership with MTC for developing and implementing transportation projects and programs that improve the lives of people throughout the Bay Area.

Sincerely,



Art Dao, Executive Director
Alameda County Transportation Commission



Randell Iwasaki, Executive Director
Contra Costa Transportation Authority



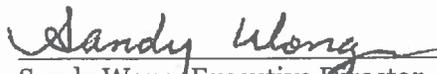
Dianne Steinhauser, Executive Director
Transportation Authority of Marin



Kate Miller, Executive Director
Napa County Transportation Planning Agency



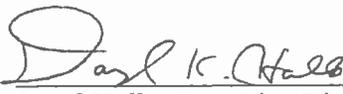
Tilly Chang, Executive Director
San Francisco County Transportation Authority



Sandy Wong, Executive Director
San Mateo City-County Association of Governments



John Ristow, Chief CMA Officer
Santa Clara Valley Transportation Authority



Daryl Halls, Executive Director
Solano Transportation Authority (STA)

CMA Letter (dated August 12, 2014) to MTC Commissioner Jim Spring
RE: CMA Comments on the Regional Transportation Plan (RTP)


Suzanne Smith, Executive Director
Sonoma County Transportation Authority

Cc: Bay Area CMA Executive Directors
Steve Heminger, MTC Executive Director
Ezra Rapport, ABAG Executive Director
Ken Kirkey, MTC Planning Director

Adam Noelting

From: David Schonbrunn [REDACTED]
Sent: Wednesday, August 13, 2014 10:57 AM
To: CTP Info
Subject: CTP Guidelines

Having been part of the CTC Working Group that twice revised the RTP Guidelines, I am very familiar with what is needed to create useful guidelines. The draft Countywide Plan Guidelines fail to provide an adequate context for transportation planning.

What's missing is an introduction that sets the stage for what amounts to a revolutionary change in transportation planning. In a total break from a past of politically driven pet projects, the new reality of climate change demands that scarce transportation funds be spent strategically. Unlike the past, transportation investments now need to produce tangible results on the RTP performance measures.

As an example of past non-strategic investments, many billions of dollars invested in BART extensions have resulted in the total ridership of the Bay Area's top six transit operators now being lower than it was thirty years ago.

Unless Countywide Plans are directed towards achieving results on RTP performance measures, the region will see a worsened environment and worsened quality of life for Bay Area residents.

A recent example comes to mind: the Alameda County Transportation Plan projected a 46% increase in VMT. (The agency recently backtracked, claiming the increase is "only" 27%, or roughly the rate of population growth.) Plans that maintain--or even worse, increase--VMT per capita keep the region on an unsustainable trend to ever-greater GHG emissions and congestion.

The CTP Guidelines need to have a frank introduction that makes it clear to both staff and decisionmakers that the old days are over, and that a new regime has arrived. Unless such an introduction is provided, only slow incremental change will occur. Given how extreme conditions are becoming at the North and South Poles, that would be too little and far too late.

--David Schonbrunn, President
TRANSDEF

Sent from my iPad



Bay Area Regional Health Inequities Initiative

Alameda County | City of Berkeley | Contra Costa County | Marin County | Napa County | City and County of San Francisco | San Mateo County | Santa Clara County | Santa Cruz County | Solano County | Sonoma County

BY EMAIL: ctp-info@mtc.ca.gov
Steve Heminger, Executive Director
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

Re: Recommendations for Changes to the Draft Guidelines for Countywide Transportation Plans

Dear Mr. Heminger:

Bay Area Regional Health Inequities Initiative (BARHII) is a collaborative of eleven local public health departments in the San Francisco Bay Area and the County of Santa Cruz. Our mission is to eliminate health inequities – unjust differences in health status and life expectancy – between different socio-economic, racial, and ethnic groups in our region. To uphold our mission, we work to support access to good jobs, quality schools, affordable housing, and viable transportation choices in our communities through our partnerships.

Our efforts for eliminating health inequities through the support of viable transportation choices have been evidenced in our work with the Metropolitan Transportation Commission (MTC) on the regional Plan Bay Area transportation plan. Our collaboration highlighted the need to consider health equity outcomes in the plan. We have recently reviewed the MTC draft Guidelines for Countywide Transportation Plans (CTPs), and are pleased to see the effort being made to provide consistency across the CTPs and the regional, Plan Bay Area. As you know, countywide transportation plans lay out how millions of dollars get spent and have not traditionally considered health promotion and health equity in their efforts.

To maximize the positive effects of countywide transportation plans on the health and wellbeing of local communities, consistency between the regional and county transportation plans is vitally important. While our work on “Plan Bay Area” has promoted a regional health equity framework, we urge greater county adherence to the regional guide, so that the healthy equity framework will be carried across into the countywide plans.

As you continue to finalize the Guidelines for Countywide Transportation Plans, we ask that the following suggestions and revisions be considered for adaptation and adoption in the final Guidelines.

- Consistency between CTPs and Plan Bay Area.
 - Specifically, ensure that CTPs incorporate the goals, objectives and performance measures of Plan Bay Area.
 - Consistency between the CTPs and Plan Bay Area's equitable smart growth vision.
- Use of health metrics and equity analyses used early on in countywide transportation planning and decision-making, including stronger language to ensure that all populations share fairly in the benefits and burdens created by any CTP.
- Linking transportation investments to a transit-oriented development, again with an equity lens.
- Encouragement to collaborate with local health departments as part of the public participation plan.
- Addition of *health interest* in the Outreach & Regional Coordination section, under "Include a broad and open public participation process that includes:"

Incorporation of the regional "Plan Bay Area" into the CTPS will help protect the most vulnerable populations in the county and contribute to improved health outcomes for all of our county's residents. Your efforts to ensure the adherence of CTPs to the Regional Plan Bay Area will serve to help promote the health and wellbeing of local communities.

Thank you for your consideration of our comments.

Sincerely,



Sandi Galvez, MSW
BARHII Executive Director
sgalvez@phi.org
(510) 302-3369



Michael Stacey, MD
Solano County
Public Health Department
Co-Chair of BARHII
mwstacey@solanocounty.com
(707) 784-8600

Adam Noelting

From: Marty Martinez [REDACTED]
Sent: Wednesday, August 13, 2014 1:22 PM
To: CTP Info
Subject: comments on CTP guidance

Thank you for the opportunity to comment on the draft guidelines to counties for the development of their County Transportation Plans (CTPs). We have joined other advocates in presenting higher level comments, but one specific point I would like to make, which I have mentioned at public meetings on the process, regards Section F, Other Plan Elements.

I applaud MTC for including the bulleted element of Active Transportation Plans and/or Complete Streets efforts, but I think it should be revised. Each county has both ongoing efforts related to Active Transportation as well as unmet needs. Each county also contains jurisdictions that have passed Complete Streets resolutions according to One Bay Area Grant requirements, and each county has funding from MTC from the Regional Safe Routes to School program. These efforts are significant MTC priorities that impact health, climate change, and equity.

The section should be reworded to call for a discussion in the CTP on each of the following: Active Transportation efforts, unmet Active Transportation needs, implementation of Complete Streets policies, and Safe Routes to School efforts. Thanks for you for your consideration.

--

Marty Martinez, MPP
Bay Area Policy Manager
Safe Routes to School National Partnership

[REDACTED]
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[REDACTED]
[REDACTED]

National: [Website](#) / [Facebook](#) / [Twitter](#)
California: [Website](#) / [Facebook](#) / [Twitter](#)



August 13, 2014

Amy Rein Worth, Chair & Commissioners
Metropolitan Transportation Commission (MTC)
101 Eighth Street
Oakland, CA 94607

via email to info@mtc.ca.gov

re: July 16, 2014 draft Guidelines for Countywide Transportation Plans

Dear Chair Worth and MTC Commissioners:

Thank you for the opportunity to comment on the draft Guidelines plan. The Guidelines must require that each Countywide Transportation Plan support SB 375, the Sustainable Communities and Climate Protection Act of 2008. The draft Guidelines do not have any mention of GHGs (greenhouse gases) or VMT (vehicle miles traveled). Significant reductions in GHG emissions and vehicle miles traveled **must** be a core goal of each of the Congestion Management Agencies as they prepare their Countywide Transportation Plans.

An example of the needed change is illustrated by the current [Alameda County Countywide Transportation Plan](#). Page 3-11 provides information about the expected increase in vehicle miles traveled through 2035, **46%**. The expected percentage increase in population over the same period is **28%** (page 3-5), which means Alameda County will have a per capita increase in VMT and come nowhere near satisfying Plan Bay Area's Performance Target of decreasing "automobile vehicle miles traveled per capita by 10 percent" ([Plan Bay Area](#), page 19, table 4, adopted by the Association of Bay Area Governments and MTC on July 18, 2013).

It would be useful for each Countywide Transportation Plan to provide information as to how closely it meets Governor Brown's [Executive Order B-16-2012](#), which orders "...that California target for 2050 a reduction of greenhouse gas emissions from the transportation sector equaling 80 percent less than 1990 levels."

Key to reducing GHG emissions in Plan Bay Area are walkable places in "Priority Development Areas" (PDAs), to reduce the need for driving. Local governments are "to encourage growth of jobs and housing production in areas supported by amenities and

infrastructure” (ABAG and MTC: “[Visions for Priority Development Areas/Jobs–Housing Connection Strategy](#)/May 2012”). PDAs are a very important element for the Bay Area’s future, as according to “[Frequently Asked Questions](#)” published by One Bay Area (of which MTC and ABAG are member agencies) the PDAs are “proposed to absorb about 80 percent of new housing and over 60 percent of new jobs on less than five percent of the Bay Area’s land.”

Our observation is that the Priority Development Areas are a well-kept secret in the San Francisco Bay Area. The draft Guidelines plan mentions Priority Development Areas only once, in a recommendation that Countywide Transportation Plans “should reference and include a discussion” of them. This is inadequate. The Guidelines should require each Congestion Management Agency, as it prepares its next Countywide Transportation Plan, to work with its county and local jurisdictions to get the PDAs up and running in the short run. Housing prices and rents are now high in many parts of the Bay Area—growth in housing production should be a priority if the Sustainable Communities Strategy is to be effective and successful.

There are requirements, such as a minimal level of mass transit service, that must be met for a PDA to be successful. The Guidelines should require Countywide Transportation Plans to provide unmet but necessary transportation improvements as soon as possible.

The Guidelines should require, as each Congestion Management Agency references and discusses the PDAs in its geographic territory, that any one that cannot meet the requirements of a PDA (eg, it will be flooded by the rising sea level) have its status as a PDA taken away and no further grant funding should be extended to it.

The Guidelines must support Plan Bay Area’s “Performance Targets,” otherwise this statement by MTC and ABAG in Plan Bay Area is meaningless, “...wanting to hew to strict objective standards of progress, MTC and ABAG adopted 10 specific targets against which to measure the success of the plan in achieving genuine regional benefits and required statutory goals.” As well, there must be a reasonable effort to make the Priority Development Areas a success as soon as is possible.

We request that MTC’s response to these comments be emailed to Michael Ferreira of the Loma Prieta Chapter of the Sierra Club at MichaelJFerreira@gmail.com. If you have any questions regarding our comments, please do not hesitate to contact Mr. Ferreira.

Thank you.

Signature page attached.

Sincerely,



Victoria Brandon
Redwood Chapter Chair



Rebecca Evans
San Francisco Bay Chapter Chair



Michael J. Ferreira
Loma Prieta Chapter Executive Committee / Conservation Chair

cc: Association of Bay Area Governments
California Department of Transportation
United States Department of Transportation
Sierra Club California



August 13, 2014

Mr. Doug Johnson, ^{PRINCIPAL} Senior Transportation Planner
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607

Subject: Countywide Transportation Plans (CTP) Guidelines Update

Dear Doug:

The Santa Clara Valley Transportation Authority (VTA) is submitting a letter for the update of the CTP Guidelines. The VTA appreciates the effort that the MTC has undertaken to update the guidelines to align closer to the Sustainable Communities Strategy and the update to Plan Bay Area. This letter is a supplement to the CMA Directors letter sent on August 12, 2014 and highlights specific comments relative to Santa Clara County. The VTA has had the opportunity to review the guidelines and would like to provide some additional comments:

- CTP guidelines are also based on the input from local jurisdictions and that sometimes the local priorities may not entirely be in concert with the SCS. There also needs to be some discussion in addressing local priorities within regional goals. These guidelines should complement existing data and targets that may have already been set through general plans or other local governance documents.
- The CTP guidelines highlight the need to address equity within local long range transportation planning activities. Since many CMAs are struggle to come up with a uniform definition of equity analyses, it would be helpful for MTC to provide some examples or point to examples in completed equity analyses that would translate into the countywide planning process. Please note that it would also be acceptable for CMAs to come up with their own definition if they choose to do so.
- Financial investments are a major piece within the context of the long range transportation plans. In order for the CMAs to plan effectively for the projects and programs within CTPs, financial estimates must be provided earlier. It is clear that having consistent transportation fund estimates is essential to provide accurate information for the plan. The VTA supports funding forecasts that would come out on a two-year cycle or be updated frequently to help CMAs plan ahead. The VTA also supports fund estimates to be in constant dollars rather than escalated dollars because escalated dollars requires more precision in scheduling projects than are currently achieved, and leads to bias against longer term projects as they appear proportionally more expensive.

- The CTP Guidelines highlight the need to do a robust public outreach process as part of the plan's development. The CMAs agree with this approach, however, it should be noted that the VTA has specific Title VI requirements and an outreach plan that it would use to follow through on any outreach on the long range planning process.

In conclusion, we support approval of the CTP Guidelines presented along with the changes recommended by both VTA and the other CMAs. We feel that by including these changes, the CTP guidelines will be consistent with both regional and local priorities. It will also give each CMA to come up with a unique and robust long range transportation planning process.

Please contact me at 408-321-7093 with any questions on these comments for the CTP Guidelines Update.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Augenstein".

Chris Augenstein, AICP, Deputy Director, Planning

Date: December 20, 1989
W.I.: 902.91.01
W.A.: 0713r
Referred By: WPPRC
Revised: 01/25/95-C
03/22/00-C
09/24/14-C

ABSTRACT

Resolution No. 2120, Revised

This resolution adopts the 1989 Countywide Transportation Plans: AB 3705 Guidelines for the Bay Area.

This resolution was revised on January 13, 1995, in response to amendments to Government Code 66531, which changed the required content for Countywide Transportation Plans and required MTC to adopt new guidelines for these plans. Revised Guidelines for Countywide Transportation Plans are included in Attachment A.

This resolution was revised on March 22, 2000, in response to changes in relevant Federal and State statutes. Revised Guidelines for Countywide Transportation Plans are included in Attachment A.

This resolution was revised on September 24, 2014, in response to changes in relevant Federal and State law. The effective date for the revised guidelines is for Countywide Transportation Plans initiated after October 1, 2014. Revised Guidelines for Countywide Transportation Plans are included in Attachment A.

Date: December 20, 1989
W.I.: 902.91.01
W.A.: 0713r
Referred By: WPPRC

Re: 1989 Countywide Transportation Plans: AB 3705 Guidelines

METROPOLITAN TRANSPORTATION COMMISSION

RESOLUTION NO. 2120

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code § 66500 et seq.; and

WHEREAS, Government Code § 66531 permits each county within the Commission's jurisdiction, together with the cities within the county, to develop and update transportation plan for the county and its included cities (countywide transportation plan);

WHEREAS, Government Code § 66531 further provides that these countywide plans are to be the primary basis of the Regional Transportation Plan prepared by MTC pursuant to § 66511; and

WHEREAS, Government Code § 66531 further provides that MTC shall develop guidelines for the preparation of the countywide transportation plans by January 1, 1990; now therefore, be it

RESOLVED, that MTC adopts the "Countywide Transportation Plans: AB 3705 Guidelines" attached as Attachment A to this resolution, and incorporated herein by reference; and, be it further

RESOLVED, that this resolution be transmitted to the nine Bay Area counties for use in preparing their countywide plans.

METROPOLITAN TRANSPORTATION COMMISSION

Rod Diridon, Chairperson

The above resolution was entered into by the Metropolitan Transportation Commission at a regular meeting held in Oakland, California on December 20, 1989.

Date: December 20, 1989
W.I.: 902.91.01
W.A.: 0713r
Referred By: WPPRC
Revised: 01/25/95-C
03/22/00-C
09/24/14-C

Attachment A
MTC Resolution No. 2120

Guidelines for Countywide Transportation Plans

Attachment A

Guidelines for Countywide Transportation Plans

Metropolitan Transportation Commission
September 2014

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I. INTRODUCTION

Countywide Transportation Plans (CTPs) are an integral part of Plan Bay Area (PBA), the San Francisco Bay Area's Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS).

The intent of this document is to provide context for coordinated transportation planning in the San Francisco Bay Area, as well as provide insight into the background and purpose of CTPs; to call attention to the inter-dependent relationship between CTPs and the PBA; to identify suggested content for inclusion into CTPs; and to outline the CTP update process.

A. Planning Context

Plan Bay Area grew out of the Sustainable Communities and Climate Protection Act (Sustainable Communities Act, SB 375, Chapter 728, Statutes of 2008), which requires each of the state's 18 metropolitan areas, including the Bay Area, to reduce greenhouse gas (GHG) emissions from cars and light trucks. The Bay Area's GHG reduction target is a 7 percent per capita reduction by 2020, and a 15 percent per capita reduction by 2035. Plan Bay Area exceeds the Bay Area's regional GHG reduction targets by achieving a 10 percent per capita reduction by 2020, and an 18 percent per capita reduction by 2035.

In addition to reducing GHG emissions, SB 375 requires that the Sustainable Communities Strategy (SCS) promote compact, mixed-use commercial and residential development, and identify how the region could house its current and projected population. To meet the goals of SB 375, and the emissions targets, Plan Bay Area establishes a focused growth strategy and directs most housing and employment growth into Priority Development Areas (PDAs), while protecting Priority Conservation Areas (PCAs). PDAs, nominated locally, include areas that are or will be walkable and bikable and close to public transit, jobs, schools, shopping, parks, recreation and other amenities. Plan Bay Area land uses are supported by a robust, multi-modal set of transportation investments that helped the Bay Area exceed regional GHG emission reduction targets ([see Appendix C](#)).

County planning agencies played a key role in the development of Plan Bay Area, as they will with its subsequent updates based in part on their local transportation planning initiatives.

B. CTP Background

In 1988, the State legislature passed Assembly Bill 3705 (Eastin), authorizing Bay Area counties to develop Countywide Transportation Plans (CTPs) on a voluntary basis. The provisions in AB 3705 are codified in Section 66531 ([see Appendix A](#)) of the California Government Code, and were modified by the passage of AB 1619 (Lee) (Statutes of 1994, Chapter 25). Among other things, the law suggests content to be included in the CTPs, and, if a county chooses to prepare one, the relationships between the CTP and the RTP/SCS, and between the CTP and Congestion Management Programs (CMPs).

The law states that CTPs should be developed with participation from the cities and transit operators within the county. The law calls for CTPs to be the "primary basis" for the RTP/SCS, and states that the Metropolitan Transportation Commission (MTC) shall add proposals and

policies of regional significance to the RTP/SCS. The law also states that CTPs should consider the most recent RTP/SCS, and that MTC may use the RTP/SCS to resolve inconsistencies between different counties' CTPs.

In addition, the law directs MTC to "develop guidelines to be used in the preparation of county transportation plans." MTC produced an original set of guidelines ("Guidelines") for CTPs in 1989, after AB 3705 was passed. MTC revised the CTP Guidelines in 1995 and in 2000.

This update of the Guidelines reflects the passage of new legislation at both the State and Federal levels; specifically, SB 375, and the Moving Ahead for Progress in the 21st Century Act (MAP-21) ([see Appendix B](#)).

The intent of the CTP Guidelines is to:

- Inform the relationship between CTPs and the RTP/SCS while respecting both local needs and regional priorities;
- Assist implementation of SB 375 and MAP-21; and,
- Identify appropriate content to include in the development of CTPs.

C. Purpose & Opportunities

These Guidelines are intended to create a framework for the CTP development process, and allow a county to expand upon them based on local needs and priorities. CTPs are intended to establish a county's long-range transportation vision, goals and priorities. This long-range transportation planning context is increasingly important given the complexity of the transportation system in the Bay Area. CTPs serve as significant input to Plan Bay Area, which explicitly addresses regional priorities and funding constraints.

CTPs can be particularly effective if they:

- Establish a transportation policy context;
- Provide a focal point for integrating city, county, and regional level transportation plans;
- Prioritize transportation investments for consideration in the RTP/SCS development process; and,
- Respond to local needs and provide a basis for creativity and innovation for the county and region.

II. CTPs & THE RTP/SCS

State law created an inter-dependent relationship between CTPs and the RTP/SCS. Any CTP adopted must consider the most recently adopted RTP/SCS. In turn, adopted CTPs form the "primary basis" for the next RTP/SCS. Thus, the CTP Guidelines must be "consistent with the Commission's preparation of the RTP/SCS." These requirements ensure that any CTPs and the RTP/SCS employ a common planning framework, even though the plans differ in scope, and even though the CTPs are tailored to the specific needs of each county and to the region as a whole. The following sections outline the coordinated development process, and RTP/SCS elements that should be considered in CTPs.

A. Outreach & Regional Coordination

State Statute(s):

"Each county within the jurisdiction of the commission, together with the cities and transit operators within the county, may, every two years, develop and update a transportation plan for the county and the cities within the county." (66531(a))

Engaging the public, in addition to the agencies noted above, early and often in the decision-making process is critical to the success of transportation plans. MTC's Public Participation Plan serves as a resource for counties to reference while developing their outreach strategies ([see Appendix C](#)). As such, MTC recommends that CTP outreach and regional coordination should:

- Implement a broad and open public participation process that includes:
 - Under-represented interests and communities, including Native American tribes; and,
 - Economic (business), environmental, and public health interests.
- Document the local public engagement process, emphasizing how the needs of minority, low-income, and other disadvantaged communities have been considered.
- Engage regional agencies while developing and adopting CTPs. Accordingly, MTC will make available, to the extent possible, its planning and analytical resources.
- Consult the Bay Area Air Quality Management District's (BAAQMD) Clean Air Plan and its respective Transportation Control Measures (TCMs) ([see Appendix C](#)).

B. CTPs as the Primary Basis for the RTP/SCS

State Statute(s):

"The county transportation plans shall be the primary basis for the commission's regional transportation plan and shall be considered in the preparation of the regional transportation improvement program. To provide regional consistency, the county transportation plans shall consider the most recent regional transportation plan adopted by the commission." (66531(f))

CTPs can best inform the RTP/SCS if both plans use a common set of planning assumptions. As such, MTC recommends that counties partner with MTC while developing their CTPs, and that the CTP should include:

- Demographic projections consistent with those used in Plan Bay Area [RTP/SCS] ([see Section III.B](#)).
- Costs for maintenance and operations of the existing system, including the following categories ([see Section III.C](#)):
 - Transit operations and capital rehabilitation;
 - Local streets and roads (pavement and non-pavement);
 - Local bridges; and,
 - Bicycle and pedestrian facilities.
- Revenue forecasts for State (e.g., STIP) and Federal (e.g., STP & CMAQ) revenues that are consistent with those used in Plan Bay Area ([see Section III.D](#)).

C. RTP/SCS Elements That Should be Considered in CTPs

State and federal laws govern the development and content of MTC's RTP/SCS. California law relating to the development of the RTP/SCS is contained in Government Code Section 65080, and discussed in detail in the California Transportation Commission's (CTC) *2010 California Regional Transportation Plan Guidelines*. Federal Code 23CFR, Part 450.322 governs the development and content of the Metropolitan Transportation Plan [RTP/SCS] (see Appendix C).

The CTC's RTP Guidelines identify three elements for the RTP: Policy, Action and Financial. These three elements, along with a brief description, are identified below, and additional information is available within the CTC's RTP guidelines. CTPs should address these same elements in an appropriate way.

Policy Element

- Describes the transportation issues in the region;
- Identifies and quantifies regional needs expressed within both short- and long-range planning horizons (Government Code Section 65080 (b)(1));
- Maintains internal consistency with the Financial Element and fund estimates; and,
- The Policy Element should clearly convey transportation policies, including:
 - Describes how these policies were developed;
 - Identifies any significant changes in policies from previous plans; and,
 - Provides the reason(s) for any changes in policies from previous plans.

Action Element

- Consists of short-, mid-, and long-term projects and programs that address transportation issues and needs;
- Includes all transportation modes;
- Identifies investment strategies, alternatives and project priorities beyond what is already programmed; and,
- The Action element is divided into two sections:
 - Discussion of preparatory activities such as identification of existing needs, assumptions, and forecasting and potential alternative actions; and,
 - Discussion of data and conclusions.

Financial Element

- Identifies current and anticipated revenue sources and financing techniques available to fund the investments described in the Action Element;
- Defines realistic financing constraints and opportunities; and,
- The Financial Element is composed of six major components;
 1. Summary of costs to operate and maintain the current transportation system;
 2. Estimate of costs and revenues to implement the projects identified in the Action Element;
 3. Inventory of existing and potential transportation funding sources;
 4. List of candidate projects if funding becomes available;
 5. Potential funding shortfalls; and,
 6. Identification of alternative policy directions that affect the funding of projects.

In addition to state guidelines, the RTP/SCS is also developed in accordance with federal metropolitan transportation planning guidance, which provide for the following considerations (see Appendix C):

- Engage in a “continuing, cooperative, and comprehensive” multimodal transportation planning process;
- Provide for the establishment and use of a performance-driven, outcome-based approach to planning and transportation decision-making; and,
- Provide for consideration and implementation of projects and programs that address the eight planning factors: (66531(b))
 1. Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;
 2. Increase the safety of the transportation system for motorized and non-motorized users;
 3. Increase the security of the transportation system for motorized and non-motorized users;
 4. Increase accessibility and mobility of people and freight;
 5. Protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns;
 6. Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;
 7. Promote efficient system management and operation; and
 8. Emphasize the preservation of the existing transportation system.

CTPs should also account for these federal considerations.

III. CTP CONTENT

In general, CTPs should consider,

“...achieving a coordinated and balanced regional transportation system, including, but not limited to, mass transportation, highway, railroad, maritime, bicycle, pedestrian, goods movement, and aviation facilities and services. The plan shall [should] be action-oriented and pragmatic, considering both the short-term and long-term future, and shall [should] present clear, concise policy guidance...” 65080(a) (see Appendix C)

State Statute 66531(c) identifies elements for consideration in CTPs, and MTC provides recommendations of additional elements below.

A. Performance & Targets

Federal guidance, as noted above, calls for the establishment and use of a performance-driven, outcome-based approach to planning and transportation decision making.

A performance framework helps to ensure that investment decisions align with established goals and targets. As such, CTP’s should consider a performance-driven, outcome-based approach to

transportation decision making (as resources permit) emphasizing the Economy, Environment, and Equity. MTC recommends that the CTP performance framework should:

- Reflect local priorities, but also consider Plan Bay Area’s [RTP/SCS] regional targets, including SB 375’s two mandatory regional targets (see Appendix B):
 - Reduce per-capita carbon dioxide emissions from cars and light-duty trucks by 7 percent by 2020 and by 15 percent by 2035; and,
 - House by 2035, 100 percent of the region's projected 25-year growth by income level, *without displacing current low-income residents. (language in italics adopted by MTC and ABAG and not identified in SB 375)*
- Consider both project and/or investment and land use scenario analysis. MTC’s land use and travel model will be available for scenario planning analysis, if desired (see Appendix C).
- Provide a long-range vision for the CMP (Section 66531(b)).

B. Demographic & Land Use Projections

State Statute(s):

“Consideration of transportation impacts associated with land use designations embodied in the general plans of the county and cities within the county and projections of economic and population growth available from the Association of Bay Area Governments.” (Section 66531(c)(3))

CTPs can best inform the RTP/SCS if both plans use a common set of planning assumptions, including demographic and land use projections. MTC recommends that CTPs should evaluate transportation system performance using the most recent Plan Bay Area [RTP/SCS] demographic and land use projections (see Appendix C). Alternative land use scenarios may be of interest to local policy makers, and are encouraged for analysis.

C. Investments & Project Lists

State Statute(s):

“Recommendations for investments necessary to sustain the effectiveness and efficiency of the county portion of the metropolitan transportation system, as defined cooperatively by the commission and the agency designated pursuant to Section 65089 [CMPs].” (Section 66531(c)(1))

“The county transportation plan shall include recommended transportation improvements for the succeeding 10- and 20-year periods.” (Section 66531(e))

CTPs provide a basis for transportation investments considered in the RTP/SCS. As such, MTC recommends that CTP investment and project lists assess and consider all modes including, but not limited to, mass transportation, street, highway, railroad, maritime, bicycle, pedestrian, goods movement, and aviation facilities and services, and should include:

- Descriptions of all proposed, near-, mid-, and long-term, improvements and programs, including descriptions of MTC’s regional programs and studies relevant in the county. Details for MTC’s regional programs and studies are available from MTC.
- Both a financially constrained list and a vision project list. Project lists should:

- Include cost estimates in year-of-expenditure dollars using inflation factors from Plan Bay Area [RTP/SCS];
- Indicate how local, regional, state, and federal revenues are assigned for each project, whenever feasible;
- Document differences from Plan Bay Area assumptions; and,
- MTC's RTP/SCS project database will be available to the counties, and they are encouraged to use it.
- Transportation investments that, when integrated with Plan Bay Area's forecasted land use, including PDAs and PCAs, support the region's adopted Sustainable Communities Strategy (SCS) (65080(b)(2)(B)(vii)), apart from exemptions noted in state law (65080(b)(2)(K) (see Appendix C).
- Remaining needs for maintaining and operating the transportation system, including:
 - Transit operations and capital rehabilitation;
 - Local streets and roads (pavement and non-pavement);
 - Local bridges; and,
 - Bicycle and pedestrian facilities.
- Caltrans, transit agencies, and other regional agencies' planning processes also provide a basis for transportation investments considered in the RTP/SCS.

D. Revenue Forecasts & Financial Considerations

State Statute(s):

"Consideration of expected transportation revenues as estimated by the commission, the impact of these estimated revenues on investment recommendations, and options for enhanced transportation revenues." (66531(c)(5))

Revenue forecasts are important to defining realistic funding opportunities to implement the CTP. As such, CTPs can best inform the RTP/SCS if both plans use a common set of assumptions. MTC recommends that CTPs revenue forecasts and financial considerations should:

- Consider the most recent MTC forecasts for future regional, state, and federal revenues, and include forecasts of local revenues, such as those from existing sales tax expenditure programs and/or local fee programs. Revenue projections should:
 - Include revenue projections in year-of-expenditure dollars using inflation factors from Plan Bay Area [RTP/SCS];
 - Indicate how local, regional, state, and federal revenues are assigned for each project, whenever feasible; and,
 - Document differences from Plan Bay Area assumptions.
- Include discussion of any new revenue source and/or strategy to fund projects and programs within the county, including the source, amount of revenue, and the strategy to ensure its availability.

E. Equity Analysis

MTC recommends that counties conduct an equity analysis with input from the public, tailored to the specific character of the county, and with a focus on minority, low-income, and other

underserved communities. As such, MTC will make available Plan Bay Area's equity analysis and U.S. Census Bureau data as a resource to the county, and will be available for technical assistance, and/or provide examples of equity analyses. MTC's equity analysis, including county-level results, is listed for reference ([see Appendix C](#)).

F. Other Plan Elements

Counties are involved in and are leading a wide range of planning initiatives. MTC suggests that CTPs should reference and include a discussion of:

- Countywide planning initiatives, including:
 - Local/modal studies conducted by the county(s) or transit agency(s);
 - Corridor studies and relevant recommendations;
 - Community Based Transportation Plans (CBTPs);
 - Priority Development Area (PDA) Investment and Growth Strategies;
 - Active Transportation Plans, Complete Streets and Safe Routes to School efforts; and,
 - Regional and/or sub-regional transportation studies.
- Transportation infrastructure's risk and/or vulnerability to climate change (e.g., sea level rise).

IV. CTP UPDATES

State Statute(s):

"Each county within the jurisdiction of the commission, together with the cities and transit operators within the county, may, every two years, develop and update a transportation plan for the county and the cities within the county." (Section 66531(a))

"The commission, in consultation with local agencies, shall develop guidelines to be used in the preparation of county transportation plans. These guidelines shall be consistent with the commission's preparation of the regional transportation plan pursuant to Section 65081." (Section 66531(c))

In order to promote the iterative relationship between CTPs and the RTP/SCS, MTC recommends that CTPs be regularly updated and adopted within 18-30 months (before or after) of adoption of the RTP/SCS. As such, MTC recommends that the CTP Guidelines should be updated following RTP/SCS adoption.

Appendix A. State Code 66531: County Transportation Plans

- (a) Each county within the jurisdiction of the commission, together with the cities and transit operators within the county, may, every two years, develop and update a transportation plan for the county and the cities within the county. The county transportation plan shall be submitted to the commission by the agency that has been designated as the agency responsible for developing, adopting and updating the county's congestion management program pursuant to Section 65089 [CMPs], unless, not later than January 1, 1995, another public agency is designated by resolutions adopted by the county board of supervisors and the city councils of a majority of the cities representing a majority of the population in the incorporated area of the county. Nothing in this section requires additional action by the cities and county, if a joint powers agreement delegates the responsibility for the county transportation plan to the agency responsible for developing, adopting, and updating the county's congestion management program pursuant to Section 65089 [CMPs].
- (b) The county transportation plans shall be consistent with, and provide a long-range vision for, the congestion management programs in the San Francisco Bay area prepared pursuant to Section 65089 [CMPs]. The county transportation plans shall also be responsive to the planning factors included in Section 134 of the federal Intermodal Surface Transportation Efficiency Act of 1991 (Public Law 102-240).
- (c) The commission, in consultation with local agencies, shall develop guidelines to be used in the preparation of county transportation plans. These guidelines shall be consistent with the commission's preparation of the regional transportation plan pursuant to Section 65081. These plans shall include recommendations for investment necessary to mitigate the impact of congestion caused by an airport that is owned by the county, or city and county, and located in another county. The plans may include, but are not limited to, the following:
 - (1) Recommendations for investments necessary to sustain the effectiveness and efficiency of the county portion of the metropolitan transportation system, as defined cooperatively by the commission and the agency designated pursuant to Section 65089 [CMPs].
 - (2) Consideration of transportation system and demand management strategies which reinforce the requirements contained in Section 65089 [CMPs].
 - (3) Consideration of transportation impacts associated with land use designations embodied in the general plans of the county and cities within the county and projections of economic and population growth available from the Association of Bay Area Governments.
 - (4) Consideration of strategies that conserve existing transportation system capacity, such as pricing policies or long-term land use and transportation integration policies jointly developed by the commission and the agencies designated pursuant to Section 65089 [CMPs].
 - (5) Consideration of expected transportation revenues as estimated by the commission, the impact of these estimated revenues on investment recommendations, and options for enhanced transportation revenues.
- (d) The commission shall adopt revised guidelines not later than January 1, 1995.

- (e) The county transportation plan shall include recommended transportation improvements for the succeeding 10- and 20-year periods.
- (f) The county transportation plans shall be the primary basis for the commission's regional transportation plan and shall be considered in the preparation of the regional transportation improvement program. To provide regional consistency, the county transportation plans shall consider the most recent regional transportation plan adopted by the commission. Where the counties' transportation plans conflict, the commission may resolve the differences as part of the regional transportation plan. The commission shall add proposals and policies of regional significance to the regional transportation plan.
- (g) With the consent of the commission, a county may have the commission prepare its county transportation plan.
- (h) The counties, together with the commission, shall jointly develop a funding strategy for the preparation of each county's transportation plan.

Appendix B: Plan Bay Area Performance Targets

Plan Bay Area is based on 10 performance targets against which we can measure and evaluate various land use scenarios and transportation investments and policies. Some of these targets were made by law, while others were added through consultation with experts, stakeholders and the public.

The first two targets are required by Senate Bill 375, "The California Sustainable Communities and Climate Protection Act of 2008" (Steinberg), and address the respective goals of climate protection and adequate housing:

- (1) Reduce per-capita carbon dioxide emissions from cars and light-duty trucks by 7 percent by 2020 and by 15 percent by 2035.
- (2) House by 2035, 100 percent of the region's projected 25-year growth by income level, *without displacing current low-income residents. (language in italics adopted by MTC and ABAG and not identified in SB 375)*

The remaining eight targets reflect voluntary goals in the following categories:

Healthy and Safe Communities

- (3) Reduce premature deaths from exposure to particulate emissions:
 - (a) Reduce premature deaths from exposure to fine particulates (PM 2.5) by 10 percent;
 - (b) Reduce coarse particulate emissions (PM 10) by 30 percent; and,
 - (c) Achieve greater reductions in highly impacted areas.
- (4) Reduce by 50 percent the number of injuries and fatalities from all collisions (including bike and pedestrian).
- (5) Increase the average daily time walking or biking per person for transportation by 60 percent (for an average of 15 minutes per person per day).

Open Space and Agricultural Preservation

- (6) Direct all non-agricultural development within the urban footprint (existing urban development and urban growth boundaries).

Equitable Access

- (7) Decrease by 10 percent the share of low-income and lower-middle income residents' household income consumed by transportation and housing.

Economic Vitality

- (8) Increase gross regional product (GRP) by 90 percent – an average annual growth rate of approximately 2 percent (in current dollars).

Transportation System Effectiveness

- (9) Increase non-auto mode share by 10 percent and decrease automobile vehicle miles traveled per capita by 10 percent.
- (10) Maintain the transportation system in a state of good repair:
 - (a) Increase local road pavement condition index (PCI) to 75 or better;
 - (b) Decrease distressed lane-miles of state highways to less than 10 percent of total lane-miles; and,
 - (c) Reduce average transit asset age to 50 percent of useful life.

Appendix C: Additional Links and Resources

I. Regional

A. Plan Bay Area (RTP/SCS)

- <http://onebayarea.org/plan-bay-area/final-plan-bay-area.html>

1. Public Participation Plan

- http://www.mtc.ca.gov/get_involved/ppp/Final_PPP_Dec_3_2010.pdf
Section III, Public Participation Techniques

2. Performance Assessment Report

- http://onebayarea.org/pdf/final_supplemental_reports/FINAL_PBA_Performance_Assessment_Report.pdf
Section II, Purpose of Performance Assessment
Section III, Identification of Performance Targets

3. Forecast of Jobs, Population and Housing

- http://onebayarea.org/pdf/final_supplemental_reports/FINAL_PBA_Performance_Assessment_Report.pdf

4. Equity Analysis Report

- http://onebayarea.org/pdf/final_supplemental_reports/FINAL_PBA_Equity_Analysis_Report.pdf
Chapter 1, Introduction

B. Clean Air Plan

- <http://www.baaqmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plans.aspx>
- <http://www.baaqmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plan-Update.aspx>

II. State

A. State Code 66531: County Transportation Plans

- http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNumber=66531

B. State Code 65089: Congestion Management

- http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNumber=65089

C. Senate Bill 375: Sustainable Communities Strategy

- http://www.leginfo.ca.gov/pub/07-08/bill/sen/sb_0351-0400/sb_375_bill_20080930_chaptered.pdf

D. California Regional Transportation Plan Guidelines

- <http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/>

III. Federal

A. MAP-21

- <http://www.fhwa.dot.gov/map21/>

B. 23CFR, Part 450

- <http://www.fhwa.dot.gov/legregs/directives/cfr23toc.htm>
 - 450.300: Purpose
 - 450.306: Scope of the Metropolitan Transportation Planning Process
 - 450.316: Interested Parties, Participation, and Consultation
 - 450.322: Development and Content of the Metropolitan Transportation Plan

Guidelines for Countywide Transportation Plans

September 12, 2014

Background

- Government Code Section 66531
- “Primary Basis” for the RTP/SCS
- Developed with participation from the cities and transit operators
- Recommended transportation improvements for the succeeding 10- and 20-year periods

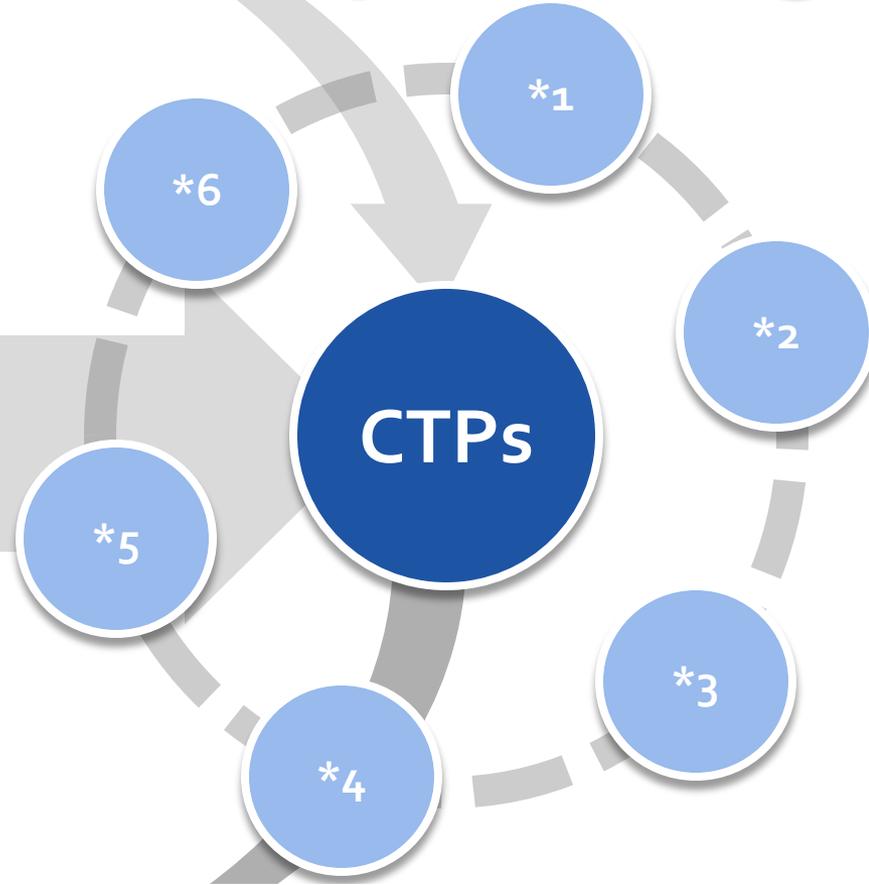
County Planning

Regional Planning

RTP/
SCS

CTP
Guidelines

CTPs

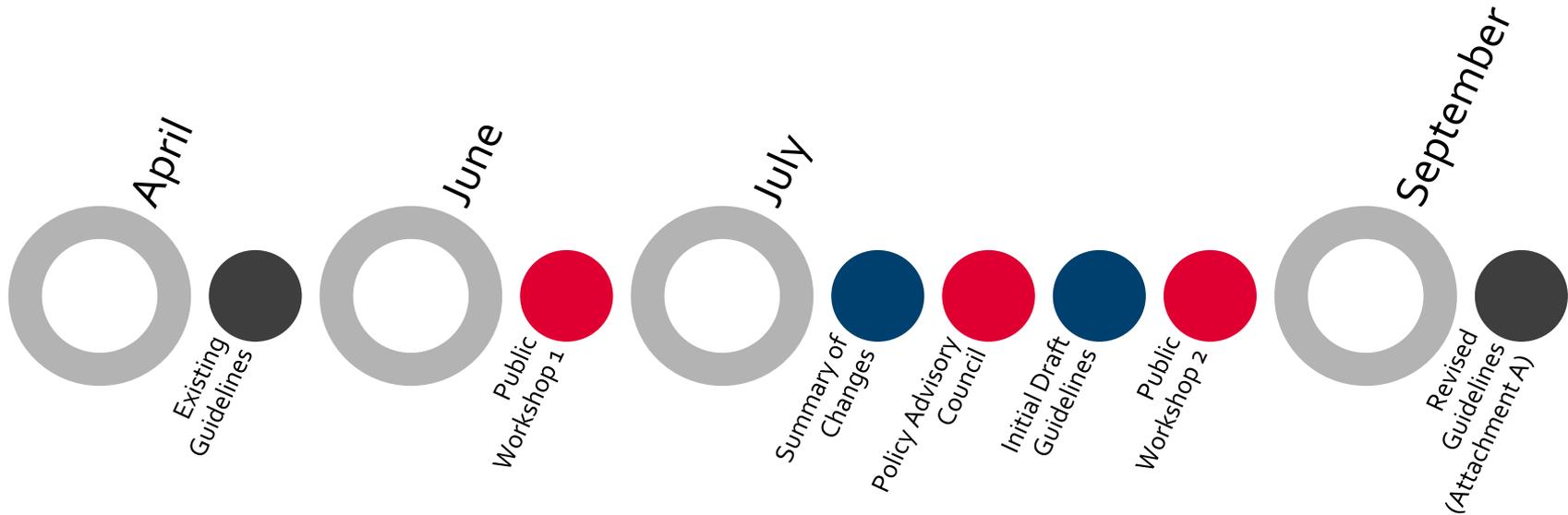


1. PDA Investment & Growth Strategies
2. Expenditure Plans
3. Congestion Management Programs
4. Active Transportation Plans
5. Modal Studies (Freight, Transit, Freeway / Corridor)
6. Community Based Plans

Intent/Purpose

- Inform the relationship between CTPs and Plan Bay Area while respecting both local needs and regional priorities
- Assist implementation of SB 375 and MAP-21
- Identify appropriate content to include in the development of CTPs

Update Process



Public Engagement

Draft Document

Divergent Themes

- Quotes from Comment letters
 - *"Consistency with Plan Bay Area's goals and performance measures"*
 - *"CTP guidelines should be based upon the principle that CTPs identify local priorities developed in a regional context"*

Updated Guidelines

- References to Plan Bay Area
- Encourages partnership with MTC
- Identifies available resources

Plan Bay Area Linkage

- Planning Context
- Performance
- Public Participation
- Outreach

Effective Date

- Effective for CTPs initiated after October 1, 2014
- Consistent with federal and state rulemaking