

1st Public Review Draft

No.	First Name	Last Name	Title	Organization	Section	Sec. Page	Appendix	Appendix Page	Comment	Staff Response
1	Richard	Marcantonio	Managing Attorney	Public Advocates, Inc.					References RTP Guidelines and Countywide Transportation Plans (CTPs)	Noted
2	Adam Livingston, Liz O'Donoghue, & Charlotte Pienkos		Director of Infrastructure and Land Use, External Affairs Manager, & Director of Planning and Policy	The Nature Conservancy & Sequoia Riverlands Trust	--	--	--	--	Incorporate Conservation into Transportation Planning and Project Development Early and Robustly Protecting natural and working lands is a state planning priority, as well as a strategy to achieve other climate and health policy goals. In transportation planning and project development, incorporating conservation early and robustly can yield more effective project delivery, better project outcomes, reduced risk, shortened environmental review, and protection of critical natural resources. We therefore recommend that the CTP and RTP Guidelines reflect the work that transportation interests and research institutions have done on this subject. Examples of relevant reports include the Federal Highway Administration's Eco-Logical: An Ecosystem Approach to Implementing Infrastructure Projects, and the Transportation Research Board's Practitioner's Guide to the Integrated Ecological Framework, which helps agencies at the state, regional and local levels achieve their project delivery goals and conservation goals. Our recommendation is also consistent with provisions in SAFETEA-LU, 12 MAP-2113 and the FAST Act14 requiring early consultation with environmental agencies and stakeholders.	Noted; not appropriate for guidelines
3	Adam Livingston, Liz O'Donoghue, & Charlotte Pienkos		Director of Infrastructure and Land Use, External Affairs Manager, & Director of Planning and Policy	The Nature Conservancy & Sequoia Riverlands Trust	--	--	--	--	Ensure Consistency with State Law and Policy The CTP and RTP Guidelines should go beyond simply requiring compliance with the law by actively incorporating California's planning priorities and climate, health and equity goals. Along with many other participants in the CTC's workshop kicking off the Guidelines Update process, we believe that transportation has a tremendous impact on the ability to achieve these goals. Currently, however, some RTPs include legacy projects that conflict with the state's climate, conservation, health, equity and affordable housing policies. To avoid this disconnect in the future, we respectfully recommend that the CTP and RTP Guidelines stress the importance of aligning transportation projects and plans with state policy goals.	Noted
4	Adam Livingston, Liz O'Donoghue, & Charlotte Pienkos		Director of Infrastructure and Land Use, External Affairs Manager, & Director of Planning and Policy	The Nature Conservancy & Sequoia Riverlands Trust	--	--	--	--	Safeguarding California Plan We also recommend that the CTP and RTP Guidelines be harmonized with the Safeguarding California Plan18 and its companion Safeguarding California Implementation Action Plans.	Noted
5	Adam Livingston, Liz O'Donoghue, & Charlotte Pienkos		Director of Infrastructure and Land Use, External Affairs Manager, & Director of Planning and Policy	The Nature Conservancy & Sequoia Riverlands Trust	--	--	--	--	AB 498 We further recommend consistency with the state's policy on wildlife corridors as expressed in AB 498. This statute articulates a statewide policy of protecting wildlife corridors and habitat strongholds in order to enhance their resilience to climate change, and of encouraging voluntary steps to protect the functioning of wildlife corridors. By referencing AB 498, the CTP and RTP Guidelines could help knit together local conservation efforts and transportation planning to support habitat connectivity, an ecological function that is particularly damaged by transportation facilities. This revision could also help to create an awareness of habitat connectivity among transportation planners who understand that climate change is a significant threat to biodiversity in California, but are less aware of opportunities to work toward connectivity enhancements that will build resilience in natural systems. Consistent with AB 498, we recommend that the CTP Guidelines provide guidance on protecting habitat connectivity and wildlife movement to increase safety, reduce animal-vehicle collisions and ensure healthy wildlife populations.	Noted
6	Adam Livingston, Liz O'Donoghue, & Charlotte Pienkos		Director of Infrastructure and Land Use, External Affairs Manager, & Director of Planning and Policy	The Nature Conservancy & Sequoia Riverlands Trust	--	--	--	--	Other Policies and Plans Other state policies and plans that should be referenced in the CTP and RTP Guidelines include the Draft Environmental Goals and Policy Report and the State Wildlife Action Plan (SWAP). The Draft EGPR identifies five elements of the state's strategy for a sustainable future, including stewarding natural and working landscapes and incorporating climate adaptation into plans and investments. The SWAP, updated in 2015, identifies the state's ecoregions and conservation goals and strategies. It also includes companion plans for the transportation and land use sectors, as well as strategies such as Regional Advance Mitigation Planning and Natural Community Conservation Plans that can be incorporated into individual regions' RTPs	Noted; added back in
7	Adam Livingston, Liz O'Donoghue, & Charlotte Pienkos		Director of Infrastructure and Land Use, External Affairs Manager, & Director of Planning and Policy	The Nature Conservancy & Sequoia Riverlands Trust	--	--	--	--	Include Performance Metrics that Measure Impacts to Natural and Working Lands We recommend that the Draft CTP and RTP Guidelines include performance metrics that measure impacts to natural and working lands so that transportation projects can avoid and minimize these impacts. Transportation systems and facilities are among the biggest threats to the health of ecosystems that sustain life for nature and people. Caltrans and regional transportation agencies should establish performance metrics, such as habitat loss, degradation, and fragmentation; riparian corridors, seeps, and springs impacted; groundwater recharge areas impacted; and wildlife corridors protected or enhanced. These metrics can be used to track progress toward state and national goals. For the CTP Guidelines, we suggest a recently published Transportation Research Board report that identifies environmental performance measures for state-level transportation planning.	Noted
8	David	Schonbrunn	President	Transportation Solutions Defense and Education Fund	Intro	5-6	--	--	The mandate of SB 391 is described in the Draft CTP Guidelines text as: Similar to the requirements for regional transportation plans under SB 375, Senate Bill (SB) 391 adds new requirements to the State's long-range transportation plan to meet California's climate change goals under AB 32. The bill requires the CTP to address how the state will achieve maximum feasible emissions reductions in order to attain a statewide reduction of greenhouse gas emissions to 1990 levels by 2020 and 80% below 1990 levels by 2050. (pp. 5-6.) CTP 2040 is not a set of recommendations leading to the achievement of the 2050 GHG emissions reduction target. The CTP does not offer a response to the perils of climate change. It merely discusses what would have to be done if the State were to get serious about reducing the GHG emissions from its largest source category, motor vehicles. Ultimately, the question is simple: "Is there any connection between the CTP's recommendations and Executive Order S-3-05?" We think the answer is clear: No.	Noted
9	David	Schonbrunn	President	Transportation Solutions Defense and Education Fund	3	--	--	--	While CTP 2040 did contain a scenario that demonstrated how the State could get to the target, the Plan then went to great lengths to disconnect itself from that scenario: Modeling of the Transportation Scenarios was a theoretical exercise designed to test one specific path to reach the AB 32 GHG reduction targets. There are limitations to the models, and all conclusions and findings should be read with this caveat. These are not specific policy recommendations. For specific recommendations, please refer to Chapter 4. (CTP 2040, p. 90.) Similarly, the title for Chapter 3 "Modeling Theoretical Transportation Scenarios" prevents any possible conclusion that a scenario can be considered a recommendation.	Noted
10	David	Schonbrunn	President	Transportation Solutions Defense and Education Fund	--	--	--	--	Conclusion The CTP Guidelines must be amended to clarify that the CTP is to provide a set of recommendations that will guide California to achieve the emissions targets cited in Sec. 14000.6 and provide the plan for the multimodal system cited in Sec. 65072.2.	Noted

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11	Wendy Alfson, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	--	--	--	--	Clarify & Strengthen Relationship between the CTP, State Modal Plans, Other Caltrans Planning Documents, and Regional Transportation Plans (RTPs) As a visioning document, the CTP should outline the state's transportation policies and priorities that should then inform transportation investments and other decisions not only by state agencies but also regional and local agencies. As currently written, the Guidelines provide no clear or meaningful pathway between the CTP strategies and objectives and RTPs--consistency should be explicitly defined--in order to achieve statewide climate targets across all component plans--and the CTP should be leveraged to provide the venue for mediating conflicting policies, programs, and investments contained in the various state modal plans, Caltrans planning documents (e.g., Caltrans Strategic management Plan, Transportation Concept Reports, etc.), and RTPs. In other words, the CTP should not simply be a compilation of state modal plans and RTPs but rather a more meaningful document where transportation planners, decision-makers, and the general public at all levels can easily comprehend and in turn operationalize the state's transportation policies and priorities. Moreover, the CTP Guidelines should be more closely aligned with the RTP Guidelines. If developed as documents that mirror the same general topics discussed, but at different scales, this approach can help strengthen the CTP by providing an opportunity for the state to directly address topics as framed within RTPs, but at a statewide level.	Noted; checking RTP guidelines for consistency
12	Wendy Alfson, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	--	--	--	--	Establish Minimum, Uniform Set of Transportation System Performance Measures One potential strategy for strengthening the relationship and consistency between the CTP, modal plans, and RTPs is to develop a standard minimum set of performance measures for transportation investments that all modal plans and RTPs must use in order to be evaluated for consistency with the CTP and progress toward statewide policy goals. These performance measures would need to also address land use, public health, social equity, and environmental considerations to be connected to and help guide the development of the regions' Sustainable Communities Strategies.	Noted
13	Wendy Alfson, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	--	--	--	--	Require the Inclusion of an Implementation Element While the CTP 2040 provides a sound foundation as a visioning document, it currently lacks any implementation measures nor does it prioritize implementation of identified recommendations either between goals/policies or within goals/policies. Since the CTP is a long-range planning document, a short-range implementation element will help usher in phased implementation of the CTP's numerous recommendations. Accordingly, we strongly urge the Guidelines include the requirement of an Implementation Element, as well as to detail the contents and form of the element--including but not limited to recommendations to guide state and regional transportation investments. Such a requirement would align the CTP Guidelines and future CTPs with requirements set forth in SB 64 (Liu 2015) that require the preparation of "specific, actionoriented, and pragmatic recommendations for transportation system improvements" based on the CTP's recommendations.	Accepted; already created since comment
14	Wendy Alfson, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	--	--	--	--	Improve Modeling to Account for Land Use and Induced Demand & Directly Tie Modeling to Recommendations and Implementation The modeling section does not provide guidance on what the desired inputs and outputs are and consequently, seems removed from the rest of the plan. Moreover, the outputs from the modeling should directly tie and/or inform the recommendations contained in the CTP. Accordingly, we recommend that the Guidelines identify the desired inputs--including those that were unavailable in time for the preparation of the CTP 2040 such as local and regional land use data and induce demand of vehicle miles traveled through roadway capacity expansion projects--and provide direction to improve modeling to include all desired inputs, as well as to require that recommendations be directly tied to model outputs. Many regions are still planning significant roadway expansion to accommodate future growth instead of considering smart, efficient growth and transportation options--the Guidelines should provide direction on how modeling should account for the impact of these investments and their induced demand of vehicle miles traveled on the state's greenhouse gas emissions.	Noted
15	Wendy Alfson, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	Intro	3	--	--	While the CTP Guidelines won't be a step-bystep guide for preparing the CTP, it should provide guidance on how to interpret and operationalize state and federal statutes. We recommend that the purpose clarify that the document will provide the necessary guidance in addition to the references to state/federal law. (Subsection - Purpose)	Accept
16	Wendy Alfson, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	Intro	3-4	--	--	As currently written, the Guidelines make it seem like state modal plans and RTPs feed into the CTP in a unidirectional manner. As a result, the CTP could be seen as simply a compilation of all lower level plans. The CTP can and should be much more than a simple compilation of plans, however, and this section should be revised to clarify that the plans influence one another in both directions. (Subsection - Relationship Between the California Transportation Plan and Regional Transportation Plans)	Accept
17	Wendy Alfson, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	1	10	--	--	This section lacks reference to and discussion of SB 64 (Liu 2015), which requires the CTC to "prepare specific, action-oriented, and pragmatic recommendations for transportation system improvements" based on the CTP's recommendations. (Subsection - Legislation and Executive Orders)	Noted
18	Wendy Alfson, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	2	13	--	--	The Guidelines should provide guidance and detail which documents and resources the CTP should draw upon in order to shaping the specific policy direction of the plan. (Subsection - Elements of the CTP policy element)	Accept
19	Wendy Alfson, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	2	14	--	--	The Guidelines state that the CTP "should identify a sustainable transportation system by pulling together the State's long-range modal plans." However, the current development of the California Statewide Bicycle & Pedestrian Plan (CSBPP) has emphasized that the CSBPP is driven in large part by the CTP 2040. This circular reasoning is yet another reason for why the CTP cannot simply be a compilation of the plans below it. We recommend that this be rewritten to clarify that the CTP should be influencing the modal plans and to a lesser extent, vice versa. (Subsection - Elements of the CTP policy element)	Accept
20	Wendy Alfson, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	2	17-18	--	--	While the CTP is not required to include fiscally constrained project lists, the model should make reasonable assumptions about the state, regional, and local investments required to meet the various policy strategies deployed to meet the statewide GHG targets. Additionally, revise as follows: "At the very least, the econometric model should report as outputs from an economic impact assessment: jobs including jobs and training targeted to individuals with employment barriers ¹ , value added, and income, public health impacts and benefits, and social and economic equity impacts on disadvantaged communities, at the state and regional level" "Caltrans should follow the public participation protocols currently in place and make every effort possible to present the analysis, and accompanying results, at a level of detail that reaches the greatest level of the public, which may require additional outreach and education of residents from disadvantaged communities" (Subsection - Elements of the CTP policy element)	First section: Noted; Second Section: Accept

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21	Wendy Alfsen, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	2	19	--	--	Bicycle and pedestrian networks should be explicitly called out as a separate element of the transportation system. Transit should be reframed as "Regional and Local Transit Networks" (Subsection - Elements of the CTP Recommendations Element-Overview of Transportation System)	Noted; already included
22	Wendy Alfsen, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	2	20-21	--	--	This section lacks mention of the increased mode share of walking, biking, and transit over the past decade as shown in the latest California Household Travel Survey. Additionally, this section should include the increasing adoption and prevalence of Complete Streets policies and practices. (Subsection - Elements of the CTP Recommendations Element-Overview of Transportation System)	Noted
23	Wendy Alfsen, Bill Sadler, Jeanie Ward-Waller, & Angela Glover Blackwell		Executive Director, Senior Policy Manager, Policy Director, & President/CEO	California Walks, Safe Routes to School, California Bicycle Coalition, & PolicyLink	2	21-22	--	--	This entire section lacks specificity on the minimum set of uniform performance measures that should guide transportation investments and provides no guidance on how performance measures, benchmarks, targets, and monitoring should be developed and on what sources these should be based. At a minimum, the Guidelines should highlight data sources on which to base the development of performance measures, benchmarks, and targets, as well as define what should be monitored and how regularly. (Subsection - Elements of the CTP Recommendations Element-Overview of Transportation System)	Noted
24	Marisa	Lundin	Director, Southern Region	California Rural Legal Assistance, INC.	--	--	--	--	There is ample legislative precedent in California and on the federal level for in-depth consideration of environmental justice into planning documents. Failure to adequately consider environmental justice in land use and transportation processes has civil rights implications and unfairly places burdens on vulnerable communities that already face overwhelming societal burdens. <u>The CTP should comport with federal and state law and policies and analyze environmental justice needs and effects.</u>	Noted
25	Marisa	Lundin	Director, Southern Region	California Rural Legal Assistance, INC.	--	--	--	--	Residents of DUCs (Disadvantaged Unincorporated Communities) all too often must travel two to three times as far to access key destinations as people living in urban areas, thus CalTrans should include a separate section in the CTP analyzing the transportation habits of rural populations and the unique strategies available to address those needs. Gradually, we are seeing policymakers in California recognize the value in analyzing the transportation needs of these populations. The 2016 Affordable Housing Sustainable Communities (AHSC) strategy, the Strategic Growth Council, after much public comment, included a 10% rural set aside for projects that will only be available to rural applicants. This set aside was the result of rural advocates pointing out the inherent density bias that existed in the project criteria of the AHSC in the first round of competitive funding and the opportunity to achieve equity within AHSC strategy goals in vulnerable rural areas.	Noted
26	Marisa	Lundin	Director, Southern Region	California Rural Legal Assistance, INC.	--	--	--	--	The current CTP draft includes several references about the unique character and needs of rural areas, but must be strengthened by including a standalone section about rural transportation needs, innovative strategies to both meet those needs and reduce GHG emissions, and special <u>consideration of funding strategies to meet those needs.</u>	Noted
27	Marisa	Lundin	Director, Southern Region	California Rural Legal Assistance, INC.	--	--	--	--	CalTrans can address this goal by gathering more data surrounding the unique transportation habits and needs of rural California. Transportation planners should be required to gather more information about the transportation needs of residents in DUCs. Rural advocates have pointed out for years that residents in rural areas drive exponentially more miles than their urban counterparts, so even though fewer individual drivers might be affected by GHG reduction projects in a rural area over an urban area, the net reduction in VMTs actually could be more in the rural area.	Noted
28	Marisa	Lundin	Director, Southern Region	California Rural Legal Assistance, INC.	--	--	--	--	Rural California should not be denied the opportunity to see benefits as their transportation costs are alleviated and their health improves due to fewer vehicle emissions. CalTrans should require more research into the GHG reduction strategies that are possible in rural California by incorporating specific recommendations in the CTP to address the transportation needs in DUCs and by including a standalone section on environmental justice and how transportation planning can protect the civil rights of protected individuals and communities.	Noted
29	Chad	Riding	Associate Transportation Planner	Caltrans	3	30			"Caltrans is committed to fostering a positive working relationship with California's federally recognized tribal governments and ensuring the inherent rights and interests of Native American tribes are considered and addressed in Caltrans' transportation planning and decision-making process through government-to-government consultation." - <u>Do we want to say that we're only interested in good relations with federally recognized tribal governments? I would delete this part.</u>	Accept
30	Chad	Riding	Associate Transportation Planner	Caltrans	3	30			"Government-to-government consultation refers to consultation between a two governments to reach mutual understanding and, where possible, harmony on policies, programs, and projects. Consultation occurs between a designated tribal representative(s) and designated representative(s) from Caltrans or another agency. "	Accept
31	Chad	Riding	Associate Transportation Planner	Caltrans	3	31			"Currently there are 109 109-140 federally recognized tribes in California. The federally recognized Tribal Governments hold inherent power of limited sovereignty and are charged with the same responsibility as other governmental authorities" - This number is constantly debated and questioned. I think the number from the Governor's Office is 109, but this number could change. - Should this be eliminated? It's not necessary to say limited, and tribes may not like it. But it is technically correct.	Accept
32	Chad	Riding	Associate Transportation Planner	Caltrans	3	31			23 United States Code (USC) part section 135 (f)(2)(C) requires the CTP be developed in consultation with tribal governments and the Secretary of the Interior. In addition, consultation shall provide an opportunity to ensure consistency between the CTP and tribal long-range transportation plans developed under 25 Code of Federal Regulations (CFR) part 170. - CFR = Code of Federal Regulations needs to be spelled out the first time.	Accept
33	Chad	Riding	Associate Transportation Planner	Caltrans	3	31			"California Government Code §65352.4 defines "consultation" as a "meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties' cultural values and, where feasible, seeking agreement. Consultation between government agencies and Native American tribes shall be conducted in a way that is mutually respectful of each party's sovereignty. Consultation shall also recognize the tribes' potential needs for confidentiality with respect to places that have traditional tribal cultural significance." - <u>This section needs to be in quotation marks or preferably block quotes because it's longer than 3 lines. Consultation probably doesn't need to be in quotes.</u>	Accept
34	Stuart	Mori	Senior Transportation Planner	CA High Speed Rail Authority	Intro	8			Introduction, page 8, Add the expansion of high-speed rail and multi-modal high-speed rail stations.	Accept. Fit HSP rail into intro; add to figure 1
35	Stuart	Mori	Senior Transportation Planner	CA High Speed Rail Authority	2	23			Section 2, Plan Contents, page 23, same as above.	Noted
36	Stuart	Mori	Senior Transportation Planner	CA High Speed Rail Authority	2	25			Section 2, Plan Contents, page 25, Increased implementation of Transit-Oriented Development at High-Speed Rail Stations can utilize urban infill to strategically build these high-speed rail stations in dense urban centers that have a mix of residential, retail and job centers allowing the public to walk, bike and take transit for their trips.	Noted

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37	Stuart	Mori	Senior Transportation Planner	CA High Speed Rail Authority	2	28			Section 2, Plan Contents, page 28, Figure 6 CTP 2040 Modeling. Move Economic and Emission Modeling (vision and TREDIS) as inputs into the Policy Scenarios.	Rejected
38	Stuart	Mori	Senior Transportation Planner	CA High Speed Rail Authority	3	32			Section 3, Consultation, Coordination and Engagement, page 32, Under Agency Collaboration, add California High-Speed Rail Authority.	Rejected, not in SB 391
39	Stuart	Mori	Senior Transportation Planner	CA High Speed Rail Authority	4	34			Section 4, Plan Adoption, page 34, add California High-Speed Rail Authority.	Rejected
40	Shirley	Medina	Director of Planning and Programming	Riverside County Transportation Commission	Intro	5			Page 5, top paragraph – There should be additional language stating that MPOs and RTPAs also receive federal funds to implement transportation improvements on the multimodal transportation system, not just planning funds.	Noted
41	Shirley	Medina	Director of Planning and Programming	Riverside County Transportation Commission	Intro	6			Page 6 – The RTP/SCS also considers the use of alternative fuels, new vehicle technology, tailpipe emission reductions, and the expansion of public transit, commuter rail, intercity rail, bicycling, and walking, which would be appropriate to mention in this paragraph.	Noted
42	Shirley	Medina	Director of Planning and Programming	Riverside County Transportation Commission	Intro	7			Page 7, Modeling, under RTP with SB 375 – should also include “scenario planning models” and the use of EMFAC modeling.	Noted
43	Shirley	Medina	Director of Planning and Programming	Riverside County Transportation Commission	Intro	7			Page 7, Applicable Sectors, under RTP with SB 375 – should read: “All – Automobiles, trucks and freight (air and port)”. It currently lists “Automobile and light truck”, which is incorrect.	Noted
44	Shirley	Medina	Director of Planning and Programming	Riverside County Transportation Commission	1	16			Page 16, top paragraph – The word “mobility” is included on the previous page and should also be reflected in the first sentence. Also, same sentence replace “fight against” with “in addressing climate change”. Suggest rewording sentence to: “The CTP should integrate these plans....capable of meeting accessibility and mobility, safety, sustainability, and economic objectives in addressing climate change.	Accept
45	Shirley	Medina	Director of Planning and Programming	Riverside County Transportation Commission	2	18			Page 18, first bullet, second sentence – Since the CTP is unconstrained it doesn't seem logical to include CTP recommendations in future State modal plans and related planning, program and investment activities unless specifically provided as guidance. Recommend rewording to: “They should be used as guidance in the development of future State modal plans...”	Rejected
46	Shirley	Medina	Director of Planning and Programming	Riverside County Transportation Commission	2	18			Page 18, under “Plan Integration” – Paragraph states that the CTP “helps tie together several internal and external inter-related plans and programs to help define and plan transportation in California.” However, the last sentence in the paragraph states that the CTP “integrates and builds upon the Caltrans’ Modal Plans and the RTPs from around the State.” “Tie together” and “build upon” are two different actions. Recommend omitting “build upon” as the document serves as guidance as clearly stated in the Introduction on page 4 and on several other pages throughout the document.	Accept
47	Shirley	Medina	Director of Planning and Programming	Riverside County Transportation Commission	2	19			Page 19, under Regional Transportation Plans, first paragraph, last sentence – Recommend omitting “build upon” per above comment.	Accept
48	Shirley	Medina	Director of Planning and Programming	Riverside County Transportation Commission	2	19			Page 19, last paragraph, second sentence – Revise to: “This shift reflects the regions’.... and sustainability objectives that meet GHG targets established by ARB through integrated investment and more efficient use of land.”	Accept, without ARB reference
49	Shirley	Medina	Director of Planning and Programming	Riverside County Transportation Commission	2	21			Page 21, under Economic Forecast and Analysis, second paragraph, first sentence – Revise to: “Moving forward, the economic impact assessment for future CTPs should continue to evolve considering Caltrans’ Mission and Vision, adopted RTPs/SCSs, and the state of economic modeling capabilities”.	Accept
50	Shirley	Medina	Director of Planning and Programming	Riverside County Transportation Commission	3	30			Page 30, under TAC, first sentence – Include at the end of the first sentence: “The TAC should include...and GHG reduction targets in addition to meeting federal air quality standards.”	Rejected
51	Natalie	Porter	Traffic Engineer	County of El Dorado	1	13-14			SB 743: add to first sentence, “for transit priority areas”. SB 743 only says “may adopt guidelines, pursuant to Section 21083 establishing alternative metrics to the metrics uses for traffic levels of service for transportation impacts outside transit priority areas”. The key word is MAY.	Noted
52	Natalie	Porter	Traffic Engineer	County of El Dorado	2	20			Page 20, first paragraph, Regions do not adopt land use plans, local agencies or entities with legal standing adopt land use plans. Remove “and land use plans” from the sentence.	Accept
53	Natalie	Porter	Traffic Engineer	County of El Dorado	-	-			General Comment - the CTP Guidelines appear to be so generic it is unclear exactly what will be covered under the plan.	Noted
54	Fernando	Castro	Associate Transportation Planner	Caltrans District 7	Intro	7			Page 7 states that no specific modeling requirements, however, the modeling methods need to be clarify specifically how it reflects the modeling in the RTPs.	Noted
55	Fernando	Castro	Associate Transportation Planner	Caltrans District 7	Intro	7			Page 7 matrix needs to be more detailed and specific to reflect California’s MPOs/RTPs.	Noted
56	Fernando	Castro	Associate Transportation Planner	Caltrans District 7	2	18-20			Plan contents pages 18 through 20: clarify relationships between statewide plans vs. regional plans?	Noted
57	Fernando	Castro	Associate Transportation Planner	Caltrans District 7	2	18-20			Pages 18 through 20: Each MPO or RTPA in California is very different. How then does CTP reconcile context of rural vs. urban and regional trends?	Noted
58	Fernando	Castro	Associate Transportation Planner	Caltrans District 7	2	21			Page 21 establish point of reference and technical guidance for economic modeling at statewide level.	Noted
59	Fernando	Castro	Associate Transportation Planner	Caltrans District 7	2	21			Page 21 establish point of reference and technical guidance for multimodal modeling at statewide level. Establish relation between MPOs and the statewide overall picture.	Noted
60	Fernando	Castro	Associate Transportation Planner	Caltrans District 7	2	23-25			Pages 23 -25: establish parameters and technical guidance for controlled measures. Do the same for the use of evolving technologies.	Noted
61	Fernando	Castro	Associate Transportation Planner	Caltrans District 7	3	29			Section 3 page 29: Outreach efforts need to be consistent with California’s socio-demographic representative of most representative regions. Ensure adequate resources.	Noted
62	Fernando	Castro	Associate Transportation Planner	Caltrans District 7	4	34			Section 4 page 34: Provide a realistic timeline consistent with the process of CTP document development, review and adoption.	Noted
63	Dan	Kopulsky	Chief, Regional Planning and Goods Movement	Caltrans District 7	Intro	5			Page 5: Specific requirements for RTPs are identified in the RTP Guidelines (http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/). RTPAs and MPOs address transportation from a regional perspective, while the CTP addresses REMOVE “the connectivity and/or travel between regions,” a statewide perspective for the transportation system.	Noted
64	Dan	Kopulsky	Chief, Regional Planning and Goods Movement	Caltrans District 7	-	-			A “Financial Element” should be included in the CTP. This element would identify all current federal, state, regional, local, transportation revenue sources. It would then have a transportation revenue forecast based on federal and state initiatives as well as any potential sources identified in RTPs.	Noted, the CTP is required to be financially unconstrained.
65	Sam	Diaz		California Natural Resources Agency	1	12			In the “Legislation and Executive Orders” section beginning on page 12, CNRA proposes the following additions: SB 246 (Wieckowski, 2015) SB 246 establishes a number of responsibilities for the Governor’s Office of Planning and Research to ensure California is prepared for impacts related to climate change. These responsibilities include the Integrated Climate and Resiliency Program (ICARP), coordination of resources amongst various state agencies including CalSTA, an update of the Adaptation Planning Guide with member agencies within one year of the Safeguarding California update, creation of an advisory council, and a climate adaptation clearinghouse complete with best-available resources and funding opportunities.	Noted
66	Sam	Diaz		California Natural Resources Agency	1	12			SB 379 (Jackson, 2015) - SB 379 modified cities’ and counties’ general plans as directed in Section 65302 of Government Code. The bill added impacts related to climate change as a consideration for a general plan’s safety element. Local officials must act either the next time a city or county revise their local hazard mitigation plan on or before January 1, 2017 or, if the city or county is just creating their hazard mitigation plan, on or before January 1, 2022.	Noted

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67	Sam	Diaz		California Natural Resources Agency	1	12			AB 1482 (Gordon, 2015) - AB 1482 requires the California Natural Resources Agency to update the state's climate adaptation strategy, Safeguarding California, by July 1, 2017 and every three years thereafter. Through this process, CNRA identifies vulnerabilities as related to a minimum of nine sectors, including transportation. CNRA, with the help of sector leads from various agencies, outlines priority actions to prepare for, and eliminate, these vulnerabilities.	Noted									
68	Sam	Diaz		California Natural Resources Agency	1	12			EO B-30-15's climate adaptation language must be included in this section as opposed to Appendix A because it directs the State to incorporate climate change impacts in all planning and investment decisions. At minimum, we would like to see this section of the EO include: +A37:V426. State agencies shall take climate change into account in their planning and investment decisions, and employ full life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives. 7. State agencies' planning and investment shall be guided by the following principles: - Priority should be given to actions that both build climate preparedness and reduce greenhouse gas emissions; - Where possible, flexible and adaptive approaches should be taken to prepare for uncertain climate impacts; - Actions should protect the state's most vulnerable populations; and - Natural infrastructure solutions should be prioritized. 8. The state's Five-Year Infrastructure Plan will take current and future climate change impacts into account in all infrastructure projects... 10. The state will continue its rigorous climate change research program focused on understanding the impacts of climate change and how best to prepare and adapt to such impacts." <input type="checkbox"/> CNRA encourages Caltrans to leverage its research program to align with EO B-30-15's language. This is further supported by the White House Council on Environmental Quality's NEPA guidance (below).	Noted									
69	Sam	Diaz		California Natural Resources Agency	1	10			Federal Transit Authority's Final Circular 4703.1 Environmental Justice Policy Guidance for FTA Recipients Issued in December 2012, FTA's Circular on EJ Policy Guidance offers concrete recommendations for FTA recipients in project design and implementation. While the Circular on EJ Policy Guidance reinforces principles and some actions in the Circular on Title VI, the basis for addressing environmental justice is Executive Order 12898 (Clinton, 1994), directing each Federal agency to "make achieving environmental justice part of its mission." The EO is intended to improve the internal management of the federal executive branch and not to create legal rights enforceable by a party against the U.S.	Noted									
70	Sam	Diaz		California Natural Resources Agency	2				Thank you for including ongoing efforts led by other state agencies in the CTP Guidelines. We are grateful to continue working together to achieve our goals to improve the quality of life of all Californians. In order to do this, please add the following statewide plans on page 4: State Water Action Plan (CNRA) State Wildlife Action Plan (California Department of Fish and Wildlife [CDFW]) Transportation Companion Plan to the State Wildlife Action Plan (CDFW and Caltrans) Safeguarding California (CNRA) Safeguarding California: Implementation Action Plans (CNRA)	Accepted									
71	Sam	Diaz		California Natural Resources Agency	3				<table border="1"> <thead> <tr> <th>Tool/Guidance Document</th> <th>Link</th> <th>Brief Overview</th> </tr> </thead> <tbody> <tr> <td>Cal-Adapt</td> <td>http://cal-adapt.org/</td> <td>Offers a view of how climate change might affect California at the local level including temperature, sea-level rise, wildfire, precipitation and snowpack.</td> </tr> <tr> <td>Urban Heat Island Index</td> <td>http://www.calepa.ca.gov/UrbanHeat/</td> <td>Provides data and mapping tools on the temperature differential between urban areas and their rural counterparts.</td> </tr> </tbody> </table>	Tool/Guidance Document	Link	Brief Overview	Cal-Adapt	http://cal-adapt.org/	Offers a view of how climate change might affect California at the local level including temperature, sea-level rise, wildfire, precipitation and snowpack.	Urban Heat Island Index	http://www.calepa.ca.gov/UrbanHeat/	Provides data and mapping tools on the temperature differential between urban areas and their rural counterparts.	Noted
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73	Linda	Wheaton	Assistant Director for Intergovernmental Affairs	Department of Housing and Community Development	1	5 and 6			Propose adding the following to Section 1, within the Federal Requirements Section (pgs. 5-6), and inclusion of statutory and regulatory language within the Appendices: Federally financed plans and programs also require compliance with Title VI of the Civil Rights Act (42 USC 2000d et. seq.), prohibiting discrimination on the basis of race, color or national origin. Implementation and compliance with Title VI implicitly involves collaboration with a host of agencies and stakeholders beyond the transportation sector, including housing agencies implementing the U.S. Housing and Urban Development (HUD) Department's July 2015 Affirmatively Furthering Fair Housing (AFFH) rule.	Noted									

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74	Linda	Wheaton	Assistant Director for Intergovernmental Affairs	California Natural Resources Agency	4	28-31			Propose adding the following to Section 4 and Appendices where appropriate (pgs. 28 – 31, perhaps cross referencing earlier mention in Section 1) Consistent with direction and practices of the U.S. Department of Transportation (DOT), the CTP should direct transportation agencies to collaborate with agencies in other sectors in implementing federal laws and regulations which intersect with transportation responsibilities in promoting access to opportunity and diversity in communities. Principles of initiatives such as the US DOT's "Ladders of Opportunity" should be encouraged for implementation within modal plans. For example, the federal Affirmatively Furthering Fair Housing (AFFH) rule requires public agencies administering HUD funds to "take meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws." Access to transportation is one of the key factors that must be assessed in analysis and actions to overcome barriers to affordable housing, employment, quality education, health care, recreation and other services. Outreach should include the State Department of Housing and Community Development (HCD) and local governments and public housing authorities which are direct recipients of HUD funds which have lead responsibility for implementation of the AFFH through an "Assessment of Fair Housing" (AFH). The AFH is incorporated into State and local Consolidated Plans and PHA Plans for allocating federal program resources such as Community Development Block Grants (CDBG) and HOME funds.	Noted
75	Linda	Wheaton	Assistant Director for Intergovernmental Affairs	California Natural Resources Agency	3	19			Propose adding the following to the "Study Areas" section (pg. 19): The CTC could sponsor a study of allocation and financing techniques which the CTC, regional transportation agencies and State and local housing agencies could employ to improve integrated financing and effectiveness of transportation corridor development.	
76	Linda	Wheaton	Assistant Director for Intergovernmental Affairs	California Natural Resources Agency	3	25			Propose adding the following to the "Implementation Element" section (pg. 25): Recommendations for implementing policies and strategies should include identification of an approximate schedule for modal and other transportation plans (i.e., identified on pgs. 21-22) and other plans to incorporate relevant actions, designating lead responsibility where feasible. This should include priority transportation-related strategies from other State plans, e.g. the Statewide Housing Plan, AB 32 Scoping Plan, Safeguarding California, and Public Health plans.	
77	Linda	Wheaton	Assistant Director for Intergovernmental Affairs	California Natural Resources Agency	-	-			Add to the Abbreviations and Acronyms section: AFFH – Affirmatively Furthering Fair Housing AFH – Assessment of Fair Housing CDBG – Community Development Block Grant HCD - Department of Community Development	Accepted