

Appendix G

Response to Comments

JP Sweeney, Central Transit & Development Corp. (via letter dated June 14, 2010)

Mr. Sweeney's extensive and thoughtful comments were grouped into five categories and responded to accordingly.

Comment: The automobile and automobile dependent land uses, which contribute to poor air quality and economic hardship for low-income communities, are unsustainable. Although the COG is responsible for finding an alternative to the automobile that is environmentally sustainable, the RTP essentially proposes a status quo transportation system based on the automobile.

Response: It is undeniable that the automobile is the dominant transportation mode and is projected to remain so in the 2011 RTP. Nevertheless, the RTP incorporates numerous initiatives that will reduce dependence on the automobile over time and promote sustainability. These initiatives include the Fresno COG Blueprint Planning Program which proposes higher residential densities, conservation of natural resources, and incorporation of smart growth principles into local and regional plans and policies, and the Measure C Public Transportation Infrastructure Study and other Measure C programs. Unlike the original Measure C, approximately 24% of the current Measure C revenues are allocated to the Regional Public Transit Program, with over 19% of the revenues allocated to the Public Transit Agencies Subprogram. Other programs include the Farmworker Van Pool/Car Pool/Commuter Van Pool Subprogram and the ADA/Seniors/Paratransit Subprogram. In addition, the Pedestrian/Trails/Bicycle Facilities Subprograms will receive 4% of Measure C revenues. Measure C even includes funding for a Transit Oriented In-Fill Infrastructure Subprogram.

It's important to note that, upon adoption of the 2011 RTP and related documents, work will begin immediately on the 2015 RTP. That version of the RTP will be compliant with the provisions of SB 375, including the development of a Sustainable Community Strategy (or Alternative Planning Strategy). The purpose of the SCS is to reduce greenhouse gas emissions by influencing land use patterns to reduce VMT. Certainly, the transportation system is evolving from an emphasis on the automobile to other transportation modes and a recognition of the relationship between transportation and land use, and this recognition is clearly reflected in the 2011 RTP.

Comment: While higher densities may lead to increased congestion of existing transportation infrastructure, resulting in greater air pollution, private sector transit systems, including Central Transit and Development Corporation's project, have not been studied in the RTP.

Response: The Regional Transportation Plan is a Plan, not a Study. The RTP is not the appropriate vehicle to study various transit systems, be they private, public or some combination of each. At this time, the appropriate vehicle to examine alternate transit systems is the Public Transportation Infrastructure Study (PTIS), Phase 2 of which is currently underway. Phase 2 of the PTIS will focus on the cost of improving specific regional travel corridors and activity centers throughout the County considering improved transit systems and services. This effort will also identify corridors that connect rural communities with the Fresno Clovis Metropolitan Area (FCMA). The Study will involve land use and transportation modeling that will guide identification of viable future transit systems and corridors. Another option may be the Measure C New Technology Reserve Subprogram. Funding for this Subprogram would implement new transit technologies such as Personal Rapid Transit or similar system within the FCMA, thereby reducing traffic congestion, energy consumption, and air emissions resulting from less vehicular traffic and congestion. A portion of the funds may be allocated (allowed) to fund a study of new transit technologies that may be viable within or applicable to the FCMA. Any such study

would be concurrent with development of Phase 2 of the PTIS and the results of the analysis incorporated into the PTIS.

Comment: Transit and sustainable transit oriented development offer the most feasible approach to achieving cleaner air by reducing VMT.

Response: Transit and transit oriented development in conjunction with generally higher density development and other “smart growth” principles including improved walkability, bicycling, etc. will reduce VMT and improve air quality. The Fresno COG Blueprint Planning Program and the Public Transportation Infrastructure Study, and other initiatives including Complete Streets and Measure C programs, all of which are fully presented in the RTP, will over time stimulate additional transit and transit oriented development and reduce VMT.

Comment: COG’s modeling and information gathering processes need to be altered to account for the negative impacts associated with automobile-centric land use patterns.

Response: COG models do in fact address the negative impacts associated with automobile-dependent development. For example, modeling activities in support of the Blueprint Planning Program evaluate and quantify different development scenarios, including low density sprawl development, in terms of VMT, greenhouse gasses, conversion of resource lands (i.e. agricultural land) to urban uses, etc. The results of modeling activities are presented to elected officials and other decision-makers. In addition, COG’s models will be considerably enhanced in the near future with improved sensitivity to smart growth measures and parcel-level land use capabilities.

Comment: The RTP needs to outline COG’s implementation program for rail consolidation and a potential new transit system under the New Technology Program and also mention possible changes to Measure C Rail Consolidation and New Technology Programs in order to generate funds for the potential high-speed train heavy maintenance facility.

Response: Potential changes to the Measure C Extension Expenditure Plan had not been initiated at the time the 45-day review and comment period for the 2011 RTP had expired. However, there is a reasonable expectation that an amendment to the Expenditure Plan will be initiated in the near future that would transfer \$25 million from the Measure C Expenditure Plan’s Alternative Transportation Program to a newly created Measure C High-Speed Rail Heavy Maintenance Facility Program. No changes to the Measure C New Technology Program will be proposed. However, implementation of the Measure C New Technology Program will likely not occur until there is agreement as to the new transit technology (or other project, system, or service) to be implemented, and that determination will occur concurrent with development of Phase 2 of the Public Transportation Infrastructure Study, currently underway. Implementation of the Alternative Transportation Program (Rail Consolidation) is largely dependent, because of its cost, on the high-speed rail project and future specific decisions of the California High-Speed Rail Authority. Until such time as those decisions are made (i.e. alignments in both Fresno County and Madera County, coordination with the Union Pacific Railroad, design, etc.), it will not be possible to move forward with implementation of rail consolidation.

Chip Ashley, Tehipite Chapter Sierra Club (via email dated June 14, 2010)

Comment: The good news is the 2011 RTP has goals similar to Sierra Club goals regarding transportation, land use, urban environment, climate change, and air quality. The major area of conflict between the COG and Sierra Club policy concerns transportation infrastructure. The Sierra Club is generally opposed to building additional highway infrastructure—particularly adding lanes and new highways—because additional highway capacity induces more driving, even if development were to be frozen. Added highway capacity generally leads to additional auto-oriented development. In these two ways, added highway capacity results in more vehicle miles travelled (VMT), greenhouse gas, and air pollution. Auto-oriented development, also known as sprawl, consumes farm land, wetlands, habitat, and wilderness. Thus, to justify additional highway infrastructure to the Sierra Club, the COG would have to

demonstrate that it would produce a net decrease in VMT and a net improvement in air quality, climate change, and land use. The Sierra Club views the 2011 RTP as more reactive to legislation than proactive particularly with respect to climate change and air quality.

Response: Fresno County is a non-attainment area and must conform to State air quality goals. Transportation conformity is the process that is used to review the transportation plans and programs in our region to ensure they conform to the State's air quality plan. Transportation conformity ensures Federal funding and approvals are given to those transportation activities that are consistent with air quality goals.

Comment: As the Sierra Club representative on the Fresno COG Transportation Technical Committee, my criticism of the 2011 RTP is that it is more reactive than proactive. That is, it is a reactive response to federal and state policy—AB 32, SB 375, the Federal Clean Air Act, etc.—particularly with respect to the issues of climate change and air quality, which increasingly are policy drivers and, as society reluctantly awakens to the facts, are likely to become very soon even more important—as well as importunate and impatient—policy drivers. The Sierra Club sees the issues of air quality and climate change, as well as the related issues of land use, transportation, energy, population, and sustainability, as becoming increasingly and rapidly more dominant drivers not only of policy but of reality as we enter a future made increasingly uncertain because of the impacts of human behavior on the biosphere. As it is, the 2011 RTP seems more concerned with sanctions and loss of funds due to not meeting standards and deadlines than with the realities of issues like climate change, air quality, and land use.

Response: Fresno COG recognizes the importance of addressing upcoming legislative requirements and provides detail in Chapter 5: *Climate Change Element* of Fresno COG's proactive approach to addressing Climate Change. It includes strategies already under way and the planning work to involve Fresno's member agencies. The Draft SEIR incorporates mitigation measures for all environmental impacts identified and Fresno's Blueprint process is moving quickly toward the implementation stages.

Comment: Of course, the COG is not a policy-making entity. As such, the COG may be reluctant to take proactive positions on issues like climate change and air quality. However, the Sierra Club would like to see language in the 2011 RTP indicating an understanding that poor air quality—as indicated by the San Joaquin Valley's nonattainment status on ozone and particulates—and climate change due in part to burning fossil fuels and poor waste management are realities well supported by research, not merely issues of policy imposed on the COG by policy makers. The Sierra Club would like to see language indicating recognition of actual impacts on humans and on ecology. For example the RTP could answer the following questions: How many people locally are made ill or suffer early death as a result of poor air quality? How does poor air quality impact native flora and fauna and agricultural crops and animals? What evidence is there that climate change is presently impacting the local environment?

Response: For a full discussion on the impacts of air pollution on health and public welfare (which includes impacts to native flora, fauna, agriculture crops etc.) please see Chapter 5: *Climate Change Element section 5.3* and Appendix E: *Transportation Pricing Strategies Analysis section II Environmental Costs of Transportation and Societal Costs of Transportation*. The draft contained results of the Jane Hall, et al. (CSU Fullerton) study. In response to your comment to include how many people have been made ill or suffer early death due to poor air quality, the following detail has been added to that section in Appendix E: "Lastly, the most detrimental societal effect of air pollution from transportation sources is the associated health effects. A study by researchers at CSU Fullerton concluded that health effects of air pollution in the San Joaquin Valley translate into 460 premature deaths, 325 new cases of chronic bronchitis, 3,230 cases of acute bronchitis in children, 260 hospital admissions, and 23,300 asthma attacks. (Hall, Jane, Ph.D.; Brajer, Victor, Ph.D.; The Health and Related Economic Benefits of Attaining Healthful Air in the San Joaquin Valley, March 2006). The evidence that climate change is impacting the local environment can be found in Chapter 5: *Climate Change Element section 5.5*. The study cited is from work done by CSU Fresno titled: *Mitigation and Adaptation Strategies for Climate Change in Fresno, California*; Institute for Climate Change-Oceans and Atmosphere, California State University, Fresno, August 2008. In addition the Draft SEIR responds to environmental impacts of the RTP.

Comment: We also would like to see a discussion and analysis of affordable policy changes (strategies for the SCS or the APS) that are effective at reducing GHG. The Sierra Club opposes subsidies to driving and parking. The best way to end subsidies to driving would be to enact a comprehensive road use fee pricing system that (1) would pay for all road-use costs including the environmental and health costs caused by driving, (2) could still include a fuel tax or fee, (3) would mitigate impacts on low-income users and protect privacy, (4) would include congestion pricing when that technology becomes feasible, (5) would keep the per-mile price incentive to drive energy-efficient cars at least as large as it is with today's fuel excise tax, and (6) could be accompanied by tax reductions sized to achieve either net-revenue neutrality or near-net-revenue neutrality. Such a system will be installed in the Netherlands by 2014 and Denmark by 2016. The company doing the work is *Skymeter*, a Canadian company. Nevada is accepting comments on its proposal for a VMT fee system (<http://www.vmtfeenv.com/>). Since Pavely 1 requires that our cars get better mileage, it is clear that the gas tax is a road funding source that will decrease. Our COG needs to awaken our state government with all of this information.

The best way to end subsidies to parking is to unbundle the existing, significant cost of parking. This cost is generally hidden and externalized. This cost lowers wages, increases rents, and increases other costs. Ending the subsidies to driving and parking are the most cost-effective ways to reduce driving. We will have to reduce driving because we cannot go to battery electric vehicles (BEVs) soon enough and we cannot get our renewable portfolio standards (RPS) high enough soon enough in the generation of our electricity. This is shown in Figure 1 of <http://www.nrdc.org/globalWarming/sb375/files/sb375.pdf>.

Response: Please refer to Appendix E: *Transportation Pricing Strategies Analysis* for discussion of how pricing policies can reduce greenhouse gas emissions, as well as reduce criteria air pollution. Figure 1 from the NRDC study does point out the fact the increasing vehicle miles traveled (VMT) can easily overwhelm greenhouse gas savings from cleaner fuels and vehicles. The need to reduce VMT is recognized by Fresno COG and the local air district. Fresno COG's Blueprint process will address transportation and the need to reduce VMT, to direct more of the economy/jobs/housing to remain locally based, the Public Transportation Infrastructure Study (PTIS) will identify where improvements can be made to reduce single vehicle occupancy and commute trips, the system to be installed in the Netherlands is similar to the work sited in Appendix E: *Fees Based on Vehicle Use*: Representative Oberstar's suggestion (April 2009). Also a very recent study (May 10, 2010) was prepared for the California Air Resources Board (ARB) by researchers at the University of California at Irvine and Davis as a first step in a long-term process to help strengthen the technical underpinnings of SB 375 and to identify important data gaps and research needs for parking pricing and road user pricing. One conclusion from the UC work is that relating parking space demand to changes in VMT can be problematic, as drivers attempt to avoid parking charges or will select alternative destinations especially for shopping trips. The difficult balance of growing the currently very impacted Valley economy while reducing all air pollutants will certainly be a difficult balance to achieve. Pricing policies that have been shown to be most effective need to be further evaluated for their relevance, and applicability for the Fresno region. All of these studies will play an integral role as Fresno COG moves forward to draft the Sustainable Communities Strategy (SCS) or Alternate Planning Strategy (APS) during the 2014/15 RTP cycle. Please refer to Chapter 5: *Climate Change Element* for detail on the interagency cooperation/coordination currently in place between Fresno COG, the local air district, ARB, and local and state policy makers. From comment letters, conference calls, to in-person meetings in Sacramento, Fresno COG continues to take a proactive approach in addressing the challenges facing our region.

Fresno COG thanks you for your service on the Transportation Technical Committee and your comments to help improve the Draft 2011 RTP while protecting our environment.

Tom Krazan (via emails dated May 28, 2010 and June 15, 2010)

Comment: The importance of the Orange Belt for rural transportation is far too over-stated. The Orange Belt for Sanger, Parlier, Reedley, and Orange Cove is next to useless. I have tried to ride it from Sanger to Orange Cove. The travel times are extremely poor and we decided to not take the bus. Too inconvenient for general travel or traveling to work.

Response: Orange Belt Stages, a common carrier, previously operated scheduled fixed route public transit when the FCRTA was formed in 1979. They operated between their corporate location in Visalia through Tulare County into Fresno County with stops in Reedley, Parlier, Selma, and Fowler to Fresno, with on-going connection to San Luis Obispo. They provided linkages to the Amtrak Stations and Greyhound Depots in Fresno and San Luis Obispo. The FCRTA had a subsidized fare program within Fresno County that purchased Orange Belt Stage and Greyhound tickets for resale at half price to facilitate affordable transportation between communities in Fresno County. The Orange Belt Stage buses were not wheelchair accessible, so the FCRTA offered alternative services with its twenty-four (24) passenger wheelchair accessible Orange Cove Transit bus. Its route begins in Orange Cove, through Reedley, Parlier, and Sanger into Fresno. The fares were the same as the subsidized Orange Belt Stage tickets. The service was offered at different times to reduce the perception of duplicative services. After Orange Belt Stages discontinued its services, the FCRTA found it necessary to acquire a 1997 thirty-one (31) passenger, compressed natural gas, wheelchair accessible bus. In 2008, the vehicle was replaced by a thirty-seven (37) passenger, compressed natural gas, wheelchair accessible bus. The service provided two (2) weekday round trips, for morning, mid-day and late afternoon service. Between 2000 and 2003 the Fresno County sponsored service expansion County-wide as part of the Federal "Welfare to Work" program. Services were provided Monday through Saturday, from 6am to 6pm, and recognized just four (4) holidays. In the case of Orange Cove Transit, three (3) round trips were instituted, to ensure access to employment, education, training, medical and child care. During the three (3) year period, ridership in the early morning and mid-afternoon, and on Saturday's did not meet minimum performance expectations to warrant continuation. Two (2) years ago, Dinuba Transit (in Tulare County), in financial cooperation with the FCRTA, began offering an inter-County connection service between Dinuba and Reedley. The service facilitates transfers between Orange Cove Transit and Dinuba Transit. Ridership today continues to increase. In two (2) or three (3) years, it may be necessary to expand the service with Measure C funds to operate a second (2nd) vehicle in order to address the continued growth in Eastside Cities.

Comment: The function of electric cars for short travel is also too under-estimated.

Response: As noted in the RTP Chapter 5, Climate Change Element, Fresno COG supports the increased use of alternative fuel vehicles. These projects received \$3.1 million from the 2009 CMAQ program. Fresno COG is also a member of the executive committee of the Clean Cities Coalition. The Coalition works with public and private agencies to reduce petroleum use and dependence.

Also, as noted in the Draft Supplemental Environmental Impact Report (page 3-83), Fresno COG will develop an Alternative Fuel Vehicle (AFV) and Infrastructure Toolkit for member agencies that will contain best practices related to ordinances, analytical tools, financing opportunities, codes, and standards related to reducing GHG emissions. Fresno COG will identify the alternative fuel vehicle(s) (e.g. neighborhood electric vehicles) and alternative fuel infrastructure with the potential to result in the greatest GHG emission reductions.

Comment: The VMT criterion has nothing to do with Greenhouse Gases, nor does VMT equate mathematically to pounds of air pollution.

Response: VMT is an important criterion in determining greenhouse gas emissions. However, the California Air District's EMFAC Emissions Model excludes VMT from electric vehicles for purposes of calculating greenhouse gas emissions

Comment: It is requested the following be added to the Draft RTP: "New Technology" is defined as the usage and knowledge of tools, techniques, and crafts, or is systems or methods of organization, or is a material product (such as clothing) which is used in a way that is not commonly used at this time.

Response: While this may be a valid definition of "New Technology" it is not the definition that was used in the 2006 Measure "C" Extension Expenditure Plan or the Measure "C" Extension 2007 Local Agency Handbook (Other Revenue Program Funding) and carried forward into the 2011 Regional Transportation

Plan. The New Technology Reserve Subprogram is defined in the Measure “C” Extension Expenditure Plan as a funding program for new transit technologies such as Personal Rapid Transit (PRT) or similar system within the Fresno Clovis Metropolitan Area.

System benefits would include: (1) reduced traffic congestion, energy consumption, and air emissions resulting from less vehicular traffic and less surface street congestion and (2) improved mobility in densely developed areas by providing convenient and direct transit service. Eligible Subprogram projects include the evaluation (i.e. studies of new transit technologies), planning, design and construction of new transit technologies.

Chris Ganson, U.S. Environmental Protection Agency Region IX (via fax dated June 14, 2010)

Comment: EPA, the US Department of Housing and Urban Development (HUD) and the US Department of transportation (DOT) recently joined in a partnership to support measures to improve livability and sustainability. We encourage COFCG to consider the principles identified through this partnership when working to integrate the blueprint concept into regional planning. More information on the partnership, including programs and funding and grant opportunities can be found at <http://www.epa.gov/smartgrowth/partnership> and http://www.epa.gov/smartgrowth/pdf/2010_0506_leveraging_partnership.pdf.

Response: Thank you for the website links; we will use the principles on grant applications and as we move toward our 2014 RTP cycle, where we will be addressing SB 375 and the Sustainable Communities Strategy. It is interesting to note that the Federal Partnership's Livability Principles are reflective of the SJV Blueprint Principles, with the exception of leveraging federal investment, which we will be pursuing as a means to ensure that the Blueprint principles are integrated into local planning efforts.

Comment: Clarify in the RTP how the ongoing regional Blueprint effort influenced any current design and route network location decisions.

Response: As noted by EPA, Fresno COG will use the goals and criteria to guide development of the SCS. The Fresno COG Blueprint Progress Report (July 2008) includes a full set of Goals, Objectives and Performance Measures that will help guide our member agencies as they integrate the Blueprint Principles into their general plans. In the meantime, we are investing our energies in working with the Blueprint Roadmap consultant to develop a well-integrated implementation strategy that will be relevant to the entire San Joaquin Valley.

In response to how the Blueprint currently influences the decision making already proposed in the RTP: This 2011 RTP has amended the project selection criteria to support the Blueprint principles.

“Both the qualitative and performance-based criteria consider relevant and recent issues of concern to residents and decision makers in Fresno County, i.e. desire to improve air quality, improve travel speeds, and improve safety along major regional routes. Blueprint growth principles were also used for the first time in the 2011 RTP to evaluate and rank candidate street and highway capacity increasing and rehabilitation/safety projects.” (See 2011 RTP, Appendix C 3-4)

In addition, Fresno COG's Congestion Management Process (Appendix F) provides guidance. The 2009 Fresno County Congestion Management Process (CMP) was integrated and implemented in the 2011 FTIP and RTP process. As documented in the Strategy Implementation section of the 2009 CMP, in order to encourage member jurisdictions to consider alternative strategies for managing congestion/ mobility issues, a competitive scoring system was set up in the TIP process to provide incentives for members to submit CMP projects. During the 2011/2012, 2012/2013 RSTP call for projects, extra points were given to projects that met the criteria of the adopted congestion management strategies. Such CMP projects were scored based on how well they met the goals and objectives established during the congestion management process.

In addition, the 2009 CMP adopted Level of Service (LOS) D as the minimum threshold for the streets and roads in the Fresno-Clovis metropolitan areas, and LOS C for the rest of the County. In the ranking of the RTP projects, no points were given to projects that have an existing LOS D or better in the Fresno-Clovis Metro area or projects at LOS C or better in the rest of the County.

As required by the congestion management legislation, appropriate analysis of all reasonable travel demand and operational improvement strategies should be conducted for the corridor in which a capacity

increasing project is proposed. The 2009 CMP adopted a Single Occupancy Vehicle (SOV) Alternative Analysis methodology to determine whether alternative strategies can meet the demand for capacity before SOV projects are constructed. The capacity increasing projects proposed by the jurisdictions for the 2011 RTP were first matched up with the CMP network that was established during the 2009 CMP process. The capacity projects on the CMP network were then run through the SOV Alternative Analysis process. Two projects failed to meet the threshold established for the SOV analysis: Elm from North to Central, widening from 2 lanes to 4 lanes in City of Fresno; Tollhouse Road from Locan to Shepherd, widening from 2 lanes to 4 lanes in City of Clovis. These two projects were subsequently excluded from the 2011 RTP.

During the Blueprint planning process, the modeling activities considered key resource and environmentally sensitive areas by attaching discouragement layers in the analysis. In addition, the upcoming Blueprint activities will include the development of a Greenprint element as an overlay to the mapping that has already been done.

Comment: In the absence of finalized GHG thresholds guidance, EPA recommends referring to draft guidance and/or finalized guidance from other Air Quality Management Districts.

Response: Fresno COG concurs with the importance of coordinated/cooperative partnership with the local air district and both the Fresno COG and the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD) collaborate on air quality issues. The locally adopted Air District Climate Change Action Plan was discussed in Chapter 5 page 9 of the Draft 2011 RTP. This guidance will be of use in the implementation phase of the Fresno as well as the San Joaquin Valley Blueprint process. The following paragraph has been added to that section:

The first comprehensive regional policy and guidance on addressing and mitigating greenhouse gas (GHG) emission impacts caused by industrial, commercial, and residential development in the San Joaquin Valley was adopted by the Valley Air District's Governing Board December 17, 2009. This set of guidance documents is designed to assist local permitting agencies and businesses by answering several questions related to the California Environmental Quality Act (CEQA) and how to address GHG impacts under existing CEQA law. For more information please see http://www.valleyair.org/Programs/CCAP/CCAP_idx.htm.

Comment: In the RTP, discuss preparation for a carbon constrained future transportation network.

Response: As noted in the EPA comments, we can more adequately address expansion of TDMs in our next RTP cycle where we will focus on the related opportunities and constraints.

Fresno COG has begun the process of trying to incentivize land use policies that reflect the Blueprint and that will have a positive environmental impact. It has done this by including the Blueprint principles into its 2011 RTP project selection criteria. In addition, the CMP process, mentioned above, reinforces this notion. We have also included many Goals, Objectives and Performance Measures in our Blueprint Progress Report that aim to improve the "smart" integration of land use and transportation planning policies. The Report can be found at:

http://www.fresnocog.org/files/Blueprint/ProgressReport/Fresno%20County%20BP%20Document%20Revised%20Final%2007_27_09.pdf

As we work with our member jurisdictions on Blueprint implementation and SB 375 target setting, we are constantly reminded of the precarious financial situation facing cities and counties. These agencies are without the financial and staff resources necessary to move sustainability initiatives forward. We are doing our part by developing tools to assist with implementation. We are also pursuing grants to provide additional resources that will facilitate integration of the Sustainable Communities Strategy and the Blueprint into local planning documents and policy.

In an effort to quantify the extent of local agency needs, we are in the process of surveying all of the cities and counties in the Valley. The ultimate success of regional planning efforts such as the San Joaquin Valley Blueprint and SB 375's Sustainable Communities Strategy will depend on incorporation and

implementation at the local level. The support and the capacity of the counties and the cities within the region will be the determining factor in the success of this integration.

The real work still lies ahead for the 8 counties and 62 cities in the Valley. Until now, the capacity for implementation by local agencies has not been fully addressed. Nor has the relative pressure for future growth been assessed within the counties and communities of the valley. The purpose of this survey is to gather more definitive information on what the actual costs of Blueprint implementation will be. It is critical that:

- The capacity of agencies is quantified;
- Their resource needs are identified. (What documents will they need to modify or put in place to implement the Blueprint?); and
- The relative pressure for future growth in each area is estimated.

Cathy Rodriguez, Caltrans District 06 (via email dated June 15, 2010)

District 06 - Planning

Comment: In preparing to meet the requirements of SB 375, it is recommended that Fresno COG staff actively participate in two modeling activities that recently received funding. One of the modeling activities, funded with Proposition 84 Modeling Incentive funds, will improve modeling capacity of Metropolitan Planning Organizations (MPOs) to meet the requirements of SB 375. The second modeling activity is the Central Valley MPOs I-Place's Pilot Project to develop a current conditions layer in the I-Place's parcel-based model using UPLAN data sets from the Blueprint planning process.

Response: Comment noted. Fresno COG will fully participate in these two modeling activities. In fact, available funding for these two modeling activities will be administered by Fresno COG in coordination with the other Valley MPOs.

Comment: Caltrans would like to commend Fresno COG for including goals, objectives and policies addressing Complete Streets. This is particularly evident under the Fresno County Regional Blueprint Policy Element. Caltrans would like to partner with Fresno COG in the implementation of these goals, objectives, and policies.

Response: Comment noted. The Fresno COG looks forward to partnering with Caltrans and local agencies to implement Caltrans Complete Streets Implementation Action Plan and the Complete Streets Act of 2008 (AB 1358).

Comment: Under the State Route 99 Widening section on page 4-29 of the Needs Assessment and Action Element, add the following sentences: The widening project funded by Proposition 1b required the preparation of a Corridor System Management Plan (CSMP) in order to secure funding. The Fresno-Madera Urban Corridor System Management Plan included the section of SR 99 from American Avenue in Fresno County to SR 152 in Madera County. In addition, Caltrans District 6 is currently preparing a CSMP to facilitate future planning on SR 41. This CSMP will include the entire length of the SR 41 corridor, including the section in Fresno County.

Response: Comment noted. The language proposed by Caltrans is included in the Final Document.

District 06 - Transit

Comment: Fresno COG is commended for providing an efficient transit facility for the County of Fresno. FCOG is generating more efficient transit standards by promoting ridesharing, carpooling, bicycle and pedestrian access, and park-and-ride facilities. Fresno COG is further commended for its efforts to receive feedback on the Regional Transportation Plan. Through its public outreach plan Fresno COG consulted with various focus groups to solicit response through email, road shows, mailings, public meetings, and the world wide web, facebook and twitter websites.

Response: Comments noted.

District 06 – Native American Liaison

Comment: The Fresno County Council of governments has done excellent work in addressing these issues (Native American Liaison) within their draft RTP. The comments on the draft RTP are following:

Response: Comment noted.

Comment: District 6 recommends Environmental Justice and Tribal Consultation & Coordination goals within the Policy Element of the Draft Fresno COG RTP. The work conducted to create the Environmental Justice Plan through an Environmental Justice Task Force and Fresno COG's work as part of the Central Valley Tribal Collaboration Transportation Planning Project point to some of the successes of Fresno COG's public participation efforts. The 7.2.3 Regional Transportation Plan Public Outreach Plan, II. Summary of RTP Public Outreach Plan Requirements, II E, Page 7-10, addresses very specifically the consultation and coordination with tribal governments. Chapter 5.11, Page 5-14 mentions the Fresno COG Environmental Justice Plan, adopted May 2009, and brings attention to its plans to eliminate barriers and encourage environmental justice communities to take an active role in transportation decision-making. The Environmental Justice Plan should be included in Chapter 7 as part of an Environmental Justice section of the Draft Public Outreach Plan. The work is already being conducted for environmental justice and tribal consultation and the accomplishments could be readily acknowledged with goals within the Policy Element of the document

Response: Thank you for your comment. Your suggestions have been incorporated into the RTP.

District 06 – Technical Planning Branch

Comment: On page 6-14 (Financial Element) at the bottom of Exhibit 6-2. You have *From California State Controllers Office: Fiscal Year 2007-09. What does this footnote reference?

Response: Thank you for your comment. This footnote has been changed to reflect that the exhibit references the California State Controllers Office Streets and Roads Report, which is the most current information (2007-08).

Comment: On page 6-16 (Financial Element) the paragraph under Exhibit 6-4. This paragraph is hard to read. We suggest putting a parenthesis after the word "uses" and after the word "other modes", after "programs and Air Quality", insert a period after the word benefit.

Response: Thank you for your comment. The section has been updated to reflect the grammatical suggestions provided.

Comment: On page 6-17 (Financial Element) Exhibit 6-5, under Project Description, please use the word "new" alignment for Project ID FRE021106, FRE021107, and FRE021108.

Response: Thank you for your comment. The section has been updated to reflect the changes requested. Our records have also been updated.

Comment: On page 6-18 (Financial Element) for Project ID FRE071203 missing the letter "t" for Grantland and Project ID FRE111349 states that SR269 Bridge @SR109 (don't believe there is such a State Route 109).

Response: Thank you for your comment. The section has been updated to reflect the changes requested. SR109 was a typographical error and has been updated to reflect: SR 269 Bridge between SR 198 & Huron (Measure C Project G in the Rural Regional Program). Our records have also been updated.

Caltrans Division of Aeronautics

Comment: The Division of Aeronautics wishes to compliment the Fresno COG on the exceptional job of integrating aviation interests into multiple sections of the Draft RTP. There is sufficient detail to see that the COG recognizes aviation as an important component of the region's health and prosperity. Further, the pro-active approach to integrating aviation into a multi-modal transportation planning program is noteworthy for others outside the region to peruse.

Response: Comment noted.

Comment: We recommend adding a paragraph to the overview that explains how land use policies contained in the Airport Land Use Compatibility Plans (ALUCP) are reconciled with RTP transportation and land use policies. Additionally, please help the reader understand who the ALUC is in the Fresno COG area of responsibility.

Response: The Fresno County Airport Land Use Commission (ALUC) is charged with reviewing land uses and proposed land use changes in Fresno County within the vicinity of its Airports. In October of 2007, Fresno COG assumed the function of staffing and running the ALUC for Fresno County; a function formerly carried out by the County of Fresno itself. As the Metropolitan Planning Organization (MPO) and Regional Transportation Planning Agency (RTPA) for Fresno County, the County of Fresno and the 15 incorporated cities agreed that Fresno COG was the logical place to house the ALUC.

As part of the review process for land uses, proposed land use changes, zoning ordinances, conditional use permits, general plan updates, building projects, etc., local jurisdictions are required to apply to the ALUC for a review of any uses within an established vicinity of any airport. This review process is established to determine a project's or proposed land use's consistency with the adopted Fresno County Airport Land Use Compatibility Plan (ALUCP) for *noise, safety, airspace protection, and aviation easement and protection*. Further, proposed transportation projects that are part of the Regional Transportation Plan (RTP) undergo an environmental review process which is also reviewed by the ALUC for a determination of consistency with the ALUCP. This ensures that RTP projects have met the requirements of the adopted Fresno County ALUCP prior to inclusion in the RTP or upon major scope changes that require an RTP amendment.

Caltrans Division of Mass Transportation

Comment: The Division of Mass Transportation commends the Fresno COG on several items: collaborating and conducting outreach to the public, transit agencies, and surrounding San Joaquin Valley governments; creating an integrated transit service with other regions; and, continuing efforts to expand and improve transit services.

Response: Comment noted.

Comment: In the Table of Contents Section the heading for Section 1.4 is Model Discussion while the actual Section heading on page 1-12 is Modal Discussion.

Response: In the Table of Contents of the Final 2011 RTP, the heading for Section 1.4 will be changed to Modal Discussion.

Comment: Please consider replacing the term 'disabled' with 'people with disabilities' as it may be offensive to some individuals and appears throughout the document, e.g. page 2-11, 4-33, 4-34, 4-35, 4-41, etc. The United States Department of Labor's Office of Disability Employment Policy suggests addressing members of this community people first language. Please visit the following website for more information: <http://www.dol.gov/odep/pubs/fact/communicate.htm>.

Response: Thank you for your comment. Your suggestion has been incorporated into the RTP.

Caltrans Division of Transportation Planning – Office of Goods Movement

Comment: Chapter 4 of the RTP presents a very solid discussion and awareness of key goods movement issues. Valleywide coordination and resumption of the Quad Counties Freight Advisory Group are noteworthy and should lead to continued and increased goods movement awareness in the region. As is discussion related to rail corridor preservation. The Fresno COG has been a front runner with regards to involvement in the goods movement and freight outreach effort in the Valley. A chapter sub-heading to identify where the goods movement section is located in this somewhat large document to make for easier review is suggested.

Response: Comments noted. A chapter sub-heading to identify where the goods movement section is located has been included in the Final RTP.

Caltrans Division of Transportation Planning – Office of Regional and Interagency Planning, Regional Outreach Branch

Comment: A statement that the RTP is consistent with the Public Transit-Human Services Transportation Plan is required.

Response: A statement that the RTP is consistent with the Public Transit-Human Services Transportation Plan has been included in the Final RTP.

Comment: While there are a minimal number of regional pedestrian trips, we recommend more discussion about the relationship between transit, bicycling, and pedestrian trips. The discussion could include the link between transit ridership and pedestrian access, including the walk from home and work to transit.

Response: The following language is included in the Final 2011 RTP. The relationship between transit, bicycling, and pedestrian trips is important to the Fresno COG and to the communities within Fresno County. The Blueprint Planning Program along with the Public Transportation Infrastructure Study are of primary importance in addressing this relationship. For example, Blueprint Smart Growth Principles include “create walkable neighborhoods, mix land uses, and provide a variety of transportation choices” among many others. Within the new Measure C Program, 4% of funding is allocated to pedestrian/trails/bicycle facilities subprograms while fully 24% of funding is allocated to the Regional Public Transit Program, including the Public Transit Agencies Subprogram (19.66%), the Farmworker/Car/Van Pools Subprogram (1.16%), the New Technology Reserve Subprogram (2.10%) and the ADA/Seniors/Paratransit Subprogram (0.79%), among others. In addition, the 2011 RTP includes new policy regarding Complete Streets and policy enhancements suggested by the Fresno County Department of Public Health that emphasize walking, bicycling, and transit for reasons of health and well-being. Policy and funding are finally coming together to establish an achievable, not just theoretical, relationship between transit and bicycling/pedestrian infrastructure.

Comment: While there is a good discussion in Chapter 4 of Intelligent Transportation Systems and the development of the regional ITS architecture in the FCOG region, please consider adding a statement that the RTP is consistent (to the maximum extent practicable) with the regional ITS architecture.

Response: Thank you for your comment. We will incorporate your suggestion into the RTP.

Comment: The projected revenue section is missing a statement ensuring that the first four years of the projected fund estimate is consistent with the 4 year STIP.

Response: Thank you for your comment. Information about the STIP and the statement requested has been added to section 6.5 paragraph 2.

Comment: We were unable to determine whether the cost estimates for implementing the projects identified in the RTP reflect “year of expenditure dollars” to reflect inflation rates.

Response: Thank you for your comment. Yes, Fresno COG uses an inflation rate of 2% to project revenue growth in the long range plan. This information has been added to section 6.5.1 paragraph 3. The program costs are calculated using an inflation rate of 3.5% in the year of expenditure (see Section 6.6, paragraph 1).

Comment: We would suggest expanding the discussion of the public participation and interagency coordination process in Chapter 7 to clearly demonstrate how FCOG’s public outreach and interagency coordination process meets the requirements of 23 CFR 450.316(3)(b) and 23 CFR 450.322(g), 23 CFR 450.316(l)(i-x), CFR 450.316(c), and 23 CFR 450.316(i).

Response: Sections addressing interagency coordination were added to Chapter 7 of the RTP to clearly demonstrate how our public outreach and interagency coordination meets requirements of the cited CFRs. Those sections may be found on pages 7-6, 7-15 and 7-22 of the RTP.

Comment: We would like to encourage FCOG to begin exploring regional coordination with local jurisdictions, and continue coordination with San Joaquin Valley MPOs in preparation for SB 375 compliance. We encourage extensive communication and collaboration amongst all the agencies within the San Joaquin Valley regarding the development of a sustainable communities strategy to meet the requirements of SB 375.

Response:

Comment: In the RTP Checklist, under General, Question 1, the checklist page number reference lists chapters 4 and 6. A better reference is 2-1 where FCOG states that the RTP planning horizon is until 2035.

Response: This change has been made.

Comment: In the RTP Checklist, under General, Question 4, either include a discussion of the plan level purpose and need or reference the appropriate section of the RTP.

Response: The appropriate section of the RTP was referenced.

Comment: Include a discussion of the outreach activities associated with the appropriate regional air quality planning authorities.

Response: A discussion of the outreach activities has been included in the final RTP.

Comment: Please ensure that a signed checklist is contained in the final RTP.

Response: A signed checklist is contained in the final RTP.

Comment: To facilitate timely review and comment on the RTP please include specific page numbers when demonstrating compliance with various provisions on the RTP Checklist.

Response: Specific page numbers have been included.

Walter C. Waidelich, Jr. – Division Administrator, Federal Highway Administration – California Division (via letter dated June 24, 2010)

Comment: (Referencing page 2 of submitted comments) Fresno COG is commended for taking into account current trends in planning, including climate change and greenhouse gases (GHG) by providing

extensive discussion and analysis in the draft 2011 RTP and also (but not currently required by the federal planning process) in the Draft Supplemental Environmental Impact Report.

Response: Thank you for your comment. Fresno COG anticipates close coordination with FHWA as Fresno COG moves forward to draft the Sustainable Communities Strategy (SCS) or Alternate Planning Strategy (APS) during the 2014/15 RTP cycle.

Comment: While the CMP requirement and the Fresno COG's adoption of a CMP plan in 2009 is referenced in the 2011 RTP, it does not provide sufficient detail to explain what analyses were completed under the CMP to evaluate candidate projects and congestion management strategies. Without detailed documentation of Fresno COG's CMP analysis, we cannot tell if Fresno COG has met the Federal CMP requirements. This is especially of concern given that CMP was the subject of a corrective action in the 2009 certification review. Adequate documentation of the CMP process and how it was used to develop and analyze the projects and strategies in the draft 2011 RTP needs to be included in the RTP, either via a new discussion, inclusion in a technical Appendix, or referenced companion document.

Response: The 2009 Fresno County Congestion Management Process was integrated with and implemented in the 2011 FTIP and RTP processes.

As documented in the Strategy Implementation section of the 2009 Fresno County CMP, in order to encourage member jurisdictions to consider alternative strategies for managing congestion/mobility issues, a competitive scoring system was set up in the TIP process to provide incentives for members to submit CMP projects. During the 2011/2012 - 2012/2013 RSTP call for projects, extra points were given to projects that met the criteria of the adopted congestion management strategies in the 2009 Fresno County CMP. Such CMP projects were scored based on how well they met the goals and objectives established during the congestion management process.

In addition, the 2009 Fresno County CMP adopted Level of Service (LOS) D as the minimum threshold for the streets and roads in the Fresno-Clovis metropolitan areas, and LOS C for the rest of the County. In the ranking of the RTP projects, no point was given to projects that have existing condition at LOS D or better in the Fresno-Clovis Metro area or projects at LOS C or better in the rest of the County.

As required by the congestion management legislation, appropriate analysis of all reasonable travel demand and operational improvement strategies should be conducted for the corridor in which a capacity increasing project is proposed. The 2009 Fresno County CMP adopted a Single Occupancy Vehicle (SOV) Alternative Analysis methodology to determine whether alternative strategies can meet the demand for capacity before SOV projects are constructed. The capacity increasing projects proposed by the jurisdictions for the 2011 RTP were first matched up with the CMP network that was established during the 2009 CMP process. The capacity projects on the CMP network were then run through the SOV Alternative Analysis process. Two projects failed to meet the threshold established for the SOV analysis: Elm from North to Central, widening from 2 lanes to 4 lanes in the City of Fresno and Tollhouse Road from Locan to Shepherd, widening from 2 lanes to 4 lanes in the City of Clovis. These two projects were subsequently excluded from the 2011 RTP.

Further documentation on the adopted Fresno County Congestion Management Process is included in Appendix F of the Final 2011 RTP.

Comment: In 2009, Fresno COG completed an Environmental Justice Plan (EJP) which analyzed the impacts on the EJ communities of transportation investments to 2030. Will the analysis in the 2009 EJP be updated to 2035?

Response: Fresno COG intends to update the 2009 EJP to 2035.

Comment: Fresno COG has done an excellent job in the draft 2011 RTP of noting all of its opportunities for public input, and has included Appendix F to document comments received on the document. However, similar to the RTP, there is not a detailed discussion of the activities—defined by its PPP—

Fresno COG actually undertook in the development of the draft 2011 RTP -- for example, any special meetings and/or workshops held, list of organizations contacted, size of emailing lists, other types of outreach activities, etc. We recommend that this type of discussion be included in Appendix F in the final RTP.

Response: Detailed reporting of Fresno COG's outreach activities is included in the final RTP for your review.

Rosemarie Amaral, Fresno County Department of Public Health (via email dated June 16, 2010)

Comment: The Fresno County Department of Public Health suggests adding language to several existing policies, specifically to include or emphasize biking and walking, health and well-being, public transit, coordination, connectivity, and multimodalism.

Response: Selected policies in the Final 2011 RTP include appropriate language proposed by the Fresno County Department of Public Health.