



August 15, 2016

Priscilla Martinez-Velez
Division of Transportation Planning, MS-32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001

**RE: Comments on the 2016 Draft California Regional Transportation Plan
Guidelines**

Dear Ms. Martinez-Velez:

Thank you for the opportunity to comment on the draft 2016 Regional Transportation Plan (RTP) Guidelines. As the Regional Transportation Planning Agency for Monterey County, the Transportation Agency for Monterey County (TAMC) is interested in providing feedback on the draft RTP Guidelines and the potential implications for our agency.

The Transportation Agency offers the following comments:

1. In the Monterey Bay region, TAMC is one of three RTPA's that work in collaboration with the Association of Monterey Bay Area Governments (AMBAG) as the regional Metropolitan Planning Organization. TAMC supports the separation of the MPO and RTPA RTP guidelines as this will provide greater clarity as to the specific roles and responsibilities of each organization.
2. The RTP Guidelines should clearly distinguish between contents required by statute/regulation and those that are merely recommendations or best practices. The RTP checklist in Appendix C should be re-organized into separate lists of legal requirements ("shalls") and recommendations/best practices. Legal requirements should include a reference to applicable statute or regulatory authority. TAMC thinks that the word "should" in the text is too strong for optional or "best practice" items, because it implies an obligation or requirement. If something is not a legal requirement, it should be described as "recommended," "may include" or "might consider including," rather than "should."
3. Incorporating elements of SB 743 has been noted as one of the bigger changes in the draft RTP Guidelines. TAMC believes it is premature to include requirements for SB 743 as the guidance for this has not been finalized. The guidelines should reflect the requirements of the statute and not an incomplete guideline/rulemaking process.

4. The modeling chapter has become too prescriptive and needs to be revised to include statute requirements and recommendations. Section 3.4, RTDM Quality Control and Consistency, goes into significantly more depth than is needed for RTP Guidelines. Many aspects of the section are not relevant to developing RTPs. The RTP Guidelines should be limited to stating legal requirements and recommended best practices. TAMC suggests changes be made to have the most flexibility possible to account for regional differences and be able to develop plans that fit the unique characteristics of different regions across the state.

Thank you for the opportunity to comment on the proposed project. If you have any questions, please contact Grant Leonard of my staff at 831-775-0903.

Sincerely,



 Debra L. Hale
Executive Director