



Transportation Committee

**Item #12-8-2
Handout**

August 1, 2012

**Public Hearing: Draft 2013/16 Metropolitan Transportation Improvement Program,
Amendment #1 to the Metropolitan Transportation Plan Sustainable Communities
Strategy 2035 and Air Quality Conformity Analysis**

Attached are three comment letters SACOG has received.

1. Sacramento Housing Alliance, 7/27/12
2. California Department of Transportation, 7/27/12
3. Federal Highway Administration, 7/23/12

Board of Directors- Transportation Committee
Sacramento Area Council of Governments
1415 L Street Suite 300
Sacramento, CA 95814

Re: Draft 2013/13 MTIP, Amendment #1 to the MTP/SCS 2035

Honorable Members of the SACOG Transportation Committee:

We are pleased to offer our comments on the Draft Metropolitan Transportation Improvement Program (MTIP) and Amendment #1 to the Metropolitan Transportation Plan Sustainable Communities Strategy 2035 (MTP/SCS), and thank you for the opportunity to continue our involvement in planning for transportation and land use needs in the Sacramento region.

The adopted MTP/SCS moves the region in the right direction by focusing on meeting the needs of our growing population through compact growth, with a variety of transportation mode options, and with the needs of all communities in mind. We look forward to working with SACOG more closely as you develop future MTIPs to implement the MTP/SCS. We ask that in recommending approval to this MTIP, you make a commitment to:

- Hold public educational forums early in the next process to help stakeholders and the public understand how to participate in these discussions,
- Foster public participation throughout the development of the MTIP, perhaps by continuing the public engagement strategies you used during the MTP/SCS,
- Review the Call for Projects and project selection criteria to ensure that these will prioritize the key investments envisioned by the MTP and helps us achieve our region's air quality, health, social justice, and sustainability goals.

In asking you to make these commitments, we seek a more clear connection between project descriptions in the MTIP to goals in the MTP/SCS. It is important that residents who are interested in this process can discern these linkages, and spelling out the specific linkages (for example, by stating that "Project X meets Goal Y of the MTP/SCS by doing Z") would be a meaningful addition to the MTIP. Asking your member jurisdictions to help delineate these linkages would be a value added to this process.

We appreciate SACOG's continued leadership in moving the region towards a more sustainable and equitable future. Thank you for considering our recommendations.

Sincerely,



Kendra Bridges
Land Use Policy Director
Sacramento Housing Alliance

To: Jose Luis Caceres, SACOG

27 July 2012

Subject: 2013 draft FTIP Review

From: Dennis Jacobs, Caltrans FTIP Coordinator

1. You reference the Operations and Maintenance on page 12. I'd like to see 4 year projection of anticipated revenues and expenditures per Fiscal Year and a get well plan if you have any shortfalls, preferably in a table. I can provide examples from other MPOs if needed.
2. For your RSTP apportionments I am showing \$21,336 per FY as opposed to \$23,768. Not sure where the disconnect is.
3. Your SHOPP numbers look bigger than the numbers we sent out in May 2012. I show \$99,904, \$28,031, \$102,349 and \$119,799 based on our transmittal.
4. For SAC24094 why are you using Toll Credits? I do not see any federal \$ on this.
5. For SAC24470, you are using \$700K in CMAQ for CON. This project sounds capacity increasing.
6. For SAC24625 is the CMAQ being used for signal improvements?
7. For YCT18161, using CMAQ for lost revenue because of Spare the Air Days? This does not seem eligible for CMAQ. Public education and outreach is but getting reimbursed for lost revenue is not.
8. For SAC24496, you can use CMAQ for initial construction of bike/ped facilities but not to rehab. There is no emissions benefit.
9. SUT18841, what are CMAQ funds being used for? What is the item of work? It may not be eligible.
10. Please remember to provide 5 copies of the final FTIP to Caltrans as well as an electronic excel file of the financials.
11. Please ensure that the comments are addressed in the final FTIP submittal.

Thanks



U.S. Department
of Transportation
**Federal Highway
Administration**

California Division

July 23, 2012

650 Capitol Mall, Suite 4-100
Sacramento, CA 95814
(916) 498-5001

In Reply Refer To:
HDA-CA

Mr. Mike McKeever, Chief Executive Officer
Sacramento Area Council of Governments
1415 L Street, Suite 300
Sacramento, CA 95814

Dear Mr. McKeever:

SUBJECT: SACOG FY 2013 Draft FTIP Comment Letter

Thank you for submitting the Sacramento Area Council of Governments (SACOG) Draft FY 2013-16 Metropolitan Transportation Improvement Program (MTIP) to the Federal Highway Administration (FHWA) for review. Overall, we find that SACOG has developed a Draft FY 2013-16 MTIP document that substantially meets the requirements of 23 CFR 450 and the Final Rule on Statewide and Metropolitan Transportation Planning as published in the Federal Register on February 14, 2007. Our comments are as follows:

Financial Plan/Measure B: The Draft FY 2013-16 MTIP financial constraint is based upon the assumptions contained in the Financial Plan for the recently adopted 2035 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS). Measure B, a ½ cent sales tax measure or its equivalent, is shown as a revenue source in the Financial Plan, and Measure B is shown as being passed in 2014, within the first two years of Draft FY 2013-16 MTIP.

Because SACOG is an air quality non-attainment area, projects in air quality non-attainment and maintenance areas can be included in the first two years of the TIP and STIP only if funds are "available or committed" [23 CFR 450.324(e) and 23 CFR 450.216(a)(5)]. New funding from a proposed gas tax increase, a proposed regional sales tax, or a major funding increase still under debate would not qualify as "available or committed" until it has been enacted by legislation or referendum.

In addition, EPA's transportation conformity regulations specify that an air quality conformity determination can only be made on a fiscally constrained long-range transportation plan and TIP [40 CFR 93.108]. Therefore, non-attainment and maintenance areas may not rely upon proposed new taxes or other new revenue sources for the first two years of the TIP and STIP.

FHWA has discussed our Measure B concerns with Mr. Matt Carpenter of the SACOG staff, who noted that no Measure B funds are shown in the first two years of the Draft FY 2013-16 MTIP, that Measure B would actually not be passed until late in 2014, with revenue collection likely beginning in 2015, and that all Measure B activities (election, revenue collection) occur during FY 2015. Therefore, inclusion of Measure B in the Financial Plan of the 2035 MTP/SCS

is outside of the first two years of the Draft MTIP FY 2013-16 MTIP. However, FHWA still strongly recommends that SACOG include additional documentation in the Final MTIP and an addendum to the 2035 MTP/SCS Financial Plan with a more detailed explanation of Measure B than what is currently shown to avoid any confusion regarding “available and committed” funding and Measure B’s standing in the transportation planning and programming process.

Page 2: The Draft FY 2013-16 MTIP states that \$2.5 billion of a total of \$4.3 billion of Federal, State and local funding is programmed in the first four years of the document. Is this correct, and if so, why is up to \$1.8 billion shown as “not programmed”?

Page 4: SACOG has displayed good planning practice by including a table that shows the timeline for MTIP development. This is an excellent way of informing the public and interested parties not only in the major activities involved in MTIP development, but also opportunities to comment upon and become involved in the process.

Page 6: Although the various funding sources are shown in tabular form in Appendix 2, as a public information tool, SACOG may wish to consider including the grand totals for each major funding source in the Fund Sources Programmed in the MTIP section, consistent with what is shown in Appendix 2.

Page 8: Good planning practice in showing the website links for the Public Participation Plan (PPP) and Administrative Modification criteria (which are also included in Appendix 11 of the draft MTIP). As a more general comment, we note that SACOG could also include links for the 2035 MTP/SCS Financial Plan, EJ/Title VI analyses, etc. and all other planning activities relevant to development of the MTIP. Some of the sections in the Draft FY 2013-16 MTIP show links for various documents, while others do not include links.

It would make the document more internally consistent to either include links for all major documents/activities – or, alternatively, SACOG could consider enhancing the public information value of the MTIP by including a table and/or graphic that has the links to all key MPO documents (MTP, PPP, etc.) and information in the Final FY 2013-16 MTIP. Such a table could be included on the inside of the document front cover as well as on the back cover. The table could also be multipurpose in that it could be a part of all key MPO documents, not just the MTIP.

Page 10: SACOG has already included extensive project information in Appendix 5 and may wish to consider including the Annual Listing of Obligated Projects as a new Appendix to this document or add that information to Appendix 5. The URL shown in this section just points the user to SACOG’s main site, and not the Annual Listing of Obligated Projects.

Pages 10-11: SACOG has developed some very good state of the practice Environmental Justice (EJ)/Title VI analysis and documentation as part of the 2035 MTP/SCS. We recommend that SACOG consider either including some of that documentation in the Final MTIP or provide the URL that references the location of the documentation on the SACOG website.

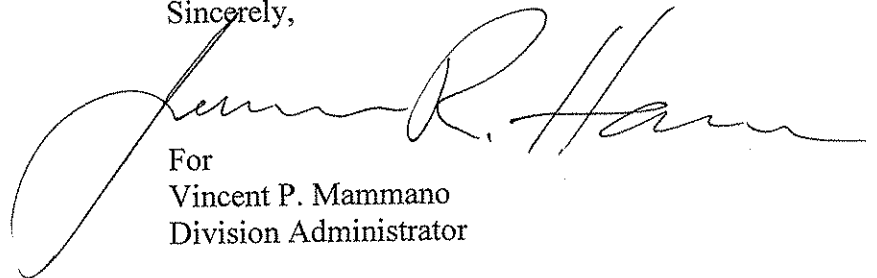
Page 13: Good public information practice by including a table on how to read the project listings.

Appendix 5: Excellent and easy to understand listing of completed, deleted and delayed projects from the previous MTIP. This is a good example of using a visualization technique to communicate information to the public in a clear and concise manner, and also ensures transparency in the use of transportation funding.

Again, thank you for submitting the Draft FY 2013-16 MTIP in a timely fashion and in concurrence and cooperation with the Caltrans' 2013 Federal Statewide Transportation Improvement Program (FSTIP) development schedule. We also want to thank Mr. Matt Carpenter of your staff for his time in answering our questions on financial constraint and Measure B, as it was very helpful to our review process. FHWA will continue to monitor SACOG's MTIP as the 2013 FSTIP schedule proceeds in the coming months and we may provide additional comments on your Draft and Final submitted FY 2013-16 MTIP.

If you have any questions, please do not hesitate to contact Scott Carson at 916-498-5029 or by email at Scott.Carson@dot.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Vincent P. Mammano".

For
Vincent P. Mammano
Division Administrator

cc: (email)

Ray Sukys, FTA

Jerome Wiggins, FTA

Karina O'Connor, EPA

Muhaned Aljabiry, Caltrans

Dennis Jacobs, Caltrans

Mike McKeever, SACOG

Theresa Arnold, SACOG

Matt Carpenter, SACOG

Jose Luis Caceres, SACOG

Jermaine Hannon, FHWA

Randy Warden, FHWA

Joseph Vaughn, FHWA

Scott Carson, FHWA

cc: (other)

SACOG MTIP Binder

scarson/km