

STAFF REPORT



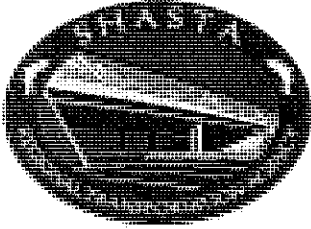
MEETING DATE:	10/14/14
SUBJECT:	Correspondence
AGENDA ITEM:	5-4
STAFF CONTACT:	Janie Coffman, Executive Assistant

Attached is correspondence determined to be of interest to the board of directors:

- June 30, 2014, letter from SRTA to U.S. Department of Transportation regarding the Federal Highway Administration's Notice of Proposed Rulemaking on the Highway Safety Improvement Program – docket number FHWA-2013-0019
- June 30, 2014, letter from SRTA to U.S. Department of Transportation regarding the Federal Highway Administration's Notice of Proposed Rulemaking on the Highway Safety Improvement Program – docket number FHWA-2013-0020
- July 11, 2014, letter from SRTA to the Department of Transportation regarding formal amendment #10 to the Shasta County 2013 Federal Transportation Improvement Program (FTIP)
- August 12, 2014, approval letter from Federal Highway Administration regarding formal amendment #10 to the Shasta County 2013 Federal Transportation Improvement Program (FTIP)
- August 12, 2014, letter from Caltrans District 2 to the U.S. Department of Transportation regarding a City of Anderson and SRTA TIGER grant application
- August 14, 2014, letter from SRTA to the California Transportation Commission regarding incomplete Active Transportation Program scoring
- September 10, 2014, letter from SRTA to the California Air Resources Board regarding the preliminary draft staff report, SB 375 GHG emissions reduction target update process
- September 25, 2014, letter from SRTA to the Department of Transportation regarding formal amendment number one to the Shasta County 2015 Federal Transportation Improvement Program (FTIP)
- September 26, 2014, North State Super Region Partnership Agenda

A blue ink signature of Daniel S. Little, consisting of stylized initials and a surname.

Daniel S. Little, AICP, Executive Director



1255 East Street, Suite 202 • Redding, CA 96001 • (530)262-6190 • FAX (530)262-6189
E-Mail srta@srta.ca.gov • HOME PAGE www.srta.ca.gov

Daniel S. Little, Executive Director

June 30, 2014

U.S. Dept. of Transportation
Dockets Management Facility
1200 New Jersey Avenue SE
Washington, DC 20590

Subject: Docket No. FHWA-2013-0019

The Shasta Regional Transportation Agency (SRTA) is pleased to provide comments on Federal Highway Administration's (FHWA) Notice of Proposed Rulemaking on the Highway Safety Improvement Program (HSIP) – docket number FHWA-2013-0019. SRTA is one of the smallest of 18 Metropolitan Planning Organizations (MPO) in California and serves as the regional transportation planning agency (RTPA) for the Shasta County region. Located in Northern California, we represent an area of 3,785 square miles with approximately 178,000 people.

Improving safety is a top priority for SRTA. From 2000-2010 approximately 39% of all collisions in our region resulted in sustained injuries or a fatality. SRTA is committed to working with state, regional, and local partners to implement cost-effective solutions that reduce fatalities and injuries for users of all modes of transportation.

SRTA is generally supportive of the proposed changes to the Highway Safety Improvement Program. However some items need clarification or raise concerns. SRTA supports many of the concerns expressed in the comment letter provided by the American Association of State Highway and Transportation Officials (AASHTO) and provide the following additional comments related to items that expressly impact our region:

1. Costs to implement FHWA Model Inventory of Roadway Elements (MIRE)

SRTA agrees that more and better data is always needed to accurately plan for current and potential future safety needs and appreciates FHWA's approach to establish a nationally consistent data collection effort, through the development of the Model Inventory of Roadway Elements (MIRE). However, SRTA believes that the assumption by FHWA that States will be the only jurisdiction to incur costs for the development of such data for all public roads is inaccurate.

According to the *2012 California Public Road Data* report prepared by the California Department of Transportation (Caltrans), approximately 140,616 of the 175,544 miles of publicly maintained roads in California are maintained by cities or counties. That is over 80% of roads in California that are not maintained by the "State." Caltrans will inevitably need to work with and likely request assistance from MPOs, RTPAs and local jurisdictions across the state to identify, collect and compile the local data to add to their Linear Reference System (LRS).

While our region has a geographic information systems (GIS) based dataset of all public roads most of the attribute data previously collected does not match the definitions of those data elements described in the *Model Inventory of Roadway Elements version 1.0* published by FHWA. Additionally, many of the proposed FDEs that would be required are not collected for most local public roads, especially such elements as average annual daily traffic (AADT), begin/end-point segment descriptor, access control, and intersection/junction geometry, to name a few. Some of the proposed FDEs that are collected are only for a handful of locations that serve as HPMS count locations, and don't cover our entire public road network.

Our communities are still struggling to recover from the economic recession and have limited general fund dollars to meet existing needs. Without the ability to utilize HSIP or other funds to assist in collecting and adding the MIRE FDE information to our roadway data MPOs, RTPAs, and local jurisdictions will be hard-pressed to meet these new requirements in the suggested timeframe.

The SRTA suggests that:

- 1) FHWA recognize that adding MIRE data elements to local public roads data for states will place a cost burden on MPOs, RTPAs, cities and counties;
- 2) Allow for HSIP program funds to also be reimbursable to MPOs, RTPAs, and/or local jurisdictions to collect, compile, update and maintain the proposed MIRE FDEs for local public roads, not just to states;
- 3) Allow for a longer timeframe to develop a process for and collection of the MIRE FDE data;
- 4) Modify language in the newly proposed 23 CFR Part 924 to reflect the following items above.

2. Use of 400 Average Annual Daily Traffic (AADT) Threshold for MIRE FDE

SRTA appreciates FHWA's proposal to utilize AADT as a metric for establishing the required amount of MIRE FDEs that would need to be collected on all local public roads. However, **SRTA would like to express the following concerns regarding the use of AADT:**

- 1) A vast majority of local public roads lack the physical count data necessary to identify if they would fit in either the "less than 400 AADT" or "Equal to or more than 400 AADT" category. To collect traffic count data on every local public road is cost prohibitive.

June 30, 2014

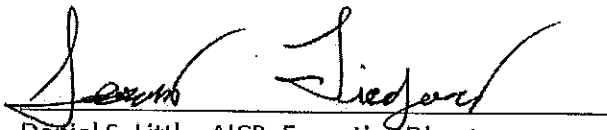
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- 2) This NPRM does not address how states, MPOs, RTPAs or local jurisdictions will identify or classify whether a local public road fits under the "less than 400 AADT" or "Equal to or more than 400 AADT" category, for those roads in which no data exists. Nor does current language in the NPRM suggest or propose a consistent process that would be utilized by all states to identify if a road has less than, equal to, or more than 400 AADT where counts are unavailable.
- 3) While extensive research has taken place to develop tools, (e.g. multiple linear regression models) to estimate AADT or ADT on local roads where traffic counts are unavailable, much of the research to-date suggests that such tools lack the degree of reliability to warrant consistent results with a high confidence level.

SRTA recommends that FHWA provide funding for research that can lead to the development of GIS-based or other tools that can reasonably estimate current, and possibly future, AADT for regions and is able to be sensitive to regional differences. FHWA should also develop a proposed standard for estimating AADT on local public roads or allow states to work with their regional agencies and local jurisdictions to develop an agreed upon process.

Again, we appreciate this opportunity to review and comment on this notice of proposed rulemaking. We know that great strides have been made to improve safety across all areas of America and we look forward to continued partnerships to continue that effort. If you have questions regarding SRTA's comments, please contact Daniel Little, AICP, Executive Director, by phone at (530) 262-6190 or email at dlittle@srta.ca.gov.

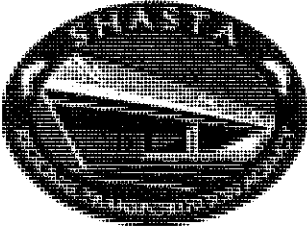
Sincerely,



For

Daniel S. Little, AICP, Executive Director
Shasta Regional Transportation Agency (MPO)

DSL/SMT/jac



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Daniel S. Little, Executive Director

June 30, 2014

U.S. Dept. of Transportation
Dockets Management Facility
1200 New Jersey Avenue SE
Washington, DC 20590

Subject: Docket No. FHWA-2013-0020

The Shasta Regional Transportation Agency (SRTA) is pleased to provide comments on Federal Highway Administration's (FHWA) Notice of Proposed Rulemaking on the National Performance Management Measures; Highway Safety Improvement Program (HSIP) – docket number FHWA-2013-0020. SRTA is one of the smallest of 18 Metropolitan Planning Organizations (MPO) in California and serves as the regional transportation planning agency (RTPA) for the Shasta County region. Located in Northern California, SRTA represents an area of 3,785 square miles with approximately 178,000 people.

Improving safety is a top priority for SRTA. From 2000-2010 approximately 39% of all collisions in the region resulted in sustained injuries or a fatality. SRTA is committed to working with the state as well as regional and local partners to implement cost-effective solutions that reduce fatalities and injuries for users of all modes of transportation. However, while the high amounts of injuries and fatalities have been acknowledged, the majority of funds are directed towards large metropolitan areas. In order to meet the goals outlined in MAP-21 more funds will need to be given to rural and small-urban regions.

SRTA provides the following comments, categorized in two sections:

- Comments on questions asked by FHWA
- Other comments

SRTA comments on questions asked by FHWA

1. *FHWA encourages comments on the extent to which the approach to performance measures set forth in this NPRM supports the principles discussed.*

FHWA's principles used to develop the performance measures is appropriate and supports four safety measures as discussed. SRTA would add that simplicity and clarity

should be part of the guiding principles in developing current and future performance measures. SRTA supports the four performance measures proposed by FHWA and suggests that there be no further breakdown.

2. *The DOT requests comments on how the Department could address separate non-motorized performance measures. The DOT requests input on the extent to which States and MPOs currently collect and report non-motorized data (fatality, serious injury, miles traveled) and the reliability and accuracy of such data, and how States and MPOs consider such data in their safety programs and in selecting investments. The DOT also invites the public to suggest ways to most efficiently track, report and use performance measures to improve safety.*

SRTA is committed to reducing fatalities and injuries for users of all modes of transportation. SRTA is developing goals for the 2015 Regional Transportation Plan (RTP) for reducing non-motorized injuries and fatalities. Goals from the RTP will help inform the programming process.

Currently, SRTA collects and reviews collision information collected via the Statewide Integrated Traffic Records System (SWITRS) application, which is maintained by the California Highway Patrol (CHP). Information is available on whether a collision included a pedestrian or bicyclist and whether an injury or fatality occurred. Data can be separated by law enforcement agency, location, county and other measures. Data on collisions is generally six months behind the date of request.

Nationwide, a majority of fatalities and serious injuries are related to motorized activity. Should FHWA consider developing a non-motorized performance measure, SRTA suggests that a fifth "non-motorized" category be developed that initially combines pedestrian and bicycle activity together. Many non-motorized facilities are shared by pedestrian and bicyclists alike and it makes more sense to address both issues together, rather than separately. Due to the wide disparity in regional differences (e.g. infrastructure, geography, population, etc.), non-motorized performance metrics and goals should be left to be decided by the MPOs and RTPAs.

3. *Stakeholders are encouraged to comment on whether a 3-, 4-, or 5-year rolling average should be required for the HSIP performance measures. Stakeholders are also encouraged to comment on whether the use of moving averages is appropriate to predict future metrics.*

SRTA supports FHWA's proposal of a 5-year rolling average for HSIP performance measures. SRTA agrees that the same 5-year rolling average should be used by all States in the HSIP. FHWA should provide direction on what the expected rolling average will be for the first HSIP in which reporting of performance measures is required.

4. ***The DOT seeks comments on whether the time lag is an issue, any impacts it may have on a State DOT's ability to establish targets, and any suggestions that can help address this issue.***

FHWA suggests that the national Highway Performance Management System (HPMS) and Fatality Analysis Reporting Systems (FARS) be used by States to develop performance targets. FHWA also indicated that these systems are approximately 24 months behind in reporting data recorded in a current calendar year (i.e. data collected in 2014 would not be available until end of year 2016 or beginning of year 2017).

SRTA is concerned that without an improvement in the time lag it would be difficult for States, MPOs and RTPAs to develop reasonable targets. Additionally, SRTA questions whether truly appropriate targets can be developed if results of the previous year's activity and improvements can't be evaluated until 2+ years later. SRTA encourages FHWA to improve the national FARS and HPMS systems to provide data to be current within 1 year or less (i.e. data through calendar year 2016 should be available for the August 31, 2017 HSIP deadline). This would ensure States, MPOs and RTPAs are developing reasonable targets with data reflecting recent investments.

5. ***FHWA seeks comments on alternative approaches that could be considered to effectively implement 23 U.S.C. 134(h)(2)(B)(i)(I) and 23 U.S.C. 150(d)(2).***

SRTA has no comments.

6. ***Stakeholders are encouraged to comment on the appropriateness of the trend line methodology proposed for the significant progress analysis.***

SRTA has no comments.

7. ***FHWA seeks comment on whether the underlying methodology of the predictions interval is appropriate.***

SRTA has no comments.

8. ***Is 50 percent the appropriate threshold for determining if a State has overall achieved or made significant progress toward achieving its performance targets.***

The 50 percent threshold for determining overall progress towards meeting performance targets is appropriate.

Other comments

1. ***Reporting rate of injuries/fatalities as "per 100 million vehicle miles traveled (VMT)."***

June 30, 2014

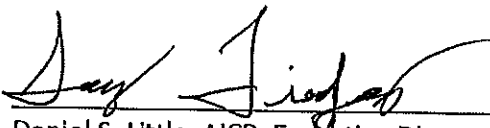
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SRTA understands that the use of injuries/fatalities per "metric" of VMT is required under MAP-21 language. However, only considering fatality/injury rates, as a metric of VMT, results in ignoring other important considerations. SRTA encourages FHWA to consider looking at other metrics such as "injuries/fatalities per 100,000 population."

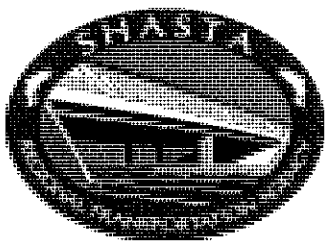
Many rural and small-urban regions have smaller populations, but experience significant levels of VMT due to their location along major travel and goods movement thoroughfares. Additionally, many of these regions have national/state highways going right through many of their communities. Using a "per 100 million VMT" metric may result in these regions not being considered for safety funds to address critical needs, and to help meet state determined targets, which might otherwise grab attention for investment of federal and state dollars.

Again, we appreciate this opportunity to review and comment on this notice of proposed rulemaking. If you have questions regarding SRTA's comments, please contact Daniel Little, AICP, Executive Director, by phone at (530) 262-6190 or email at dlittle@srta.ca.gov.

Sincerely,

For 
Daniel S. Little, AICP, Executive Director
Shasta Regional Transportation Agency (MPO)

DSL/SMT/jac



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Daniel S. Little, Executive Director

July 11, 2014

Ms. Rachel Falsetti, Division Chief
Department of Transportation
Division of Transportation Programming, MS 82
P.O. Box 942874
Sacramento, CA 94274-0001

Attention: Abhijit Bagde, SRTA FTIP Liaison

Subject: Formal Amendment No. 10 to the Shasta County 2013 Federal Transportation Improvement Program (FTIP)

Dear Ms. Falsetti:

With the delegation authority provided me by the Shasta Regional Transportation Agency (SRTA) Board of Directors (per attached SRTA Resolution #13-14, dated December 10, 2013), I hereby approve Formal Amendment No. 10 to the 2013 Federal Transportation Improvement Program (FTIP) for forwarding to Caltrans for review and recommendation of approval to the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA).

The amendment is consistent with metropolitan transportation planning regulations per Title 23 Code of Federal Regulations Part 450. As amended, the 2013 FTIP is financially constrained and the enclosed financial summary confirms that funding is available. Additionally, the amendment is consistent with the Regional Transportation Plan. Shasta County is in conformance with federal air quality standards.

The amendment notification process complied with SRTA's adopted Public Participation Plan. The public review period was June 26, 2014 through July 10, 2014, meeting the requisite two-week review period. No comments were received during this period.

This amendment primarily programs the recently adopted State Transportation Improvement Program (STIP) projects funded with Regional Improvement Program (RIP) funds, although there are some State Highway Operation and Protection Program (SHOPP) and Safe Routes to School (SRTS) adjustments. Amendment No. 10 adds, or revises, the following projects as separate line items:

- **Grouped Projects for Safety Improvements – SHOPP Collision Reduction Program (CTIPS ID No. 211-0000-0075)** – Makes programming adjustments to Fiscal Years (FYs) 2013/14 and 2014/15 based on an updated grouped listing of projects receiving State Highway Operation and Protection Program (SHOPP) Collision Reduction funding.

- **Grouped Projects for Safety Improvements Safe Routes to School (SRTS) Program (CTIPS ID No. 211-0000-0095)** – Programming adjustments have been made for the city of Redding's Bidwell project to match obligations by year. A net additional \$174,400 has been provided to the project to complete it.
- **Redding to Anderson Six Lane (CTIPS ID No. 211-0000-0100)** – This project, which was added in the 2012 State Transportation Improvement Program (STIP), is now considered the "parent" project to two spin-offs:
 - Redding to Anderson "Little Easy" Six Lane (CTIPS ID No. 211-0000-0101); and
 - Redding to Anderson Six Lane Phase II (CTIPS ID No. 211-0000-0102).The original "parent" project remains in the FTIP, with programming funding reduced by transferring the majority of funding to the two phases. Additionally, formerly programmed STIP Advanced Construction funds have been changed to National Highway System funding. To-date, the Interstate 5 Redding to Anderson Six-Lane Project is a Regional Improvement Program (RIP)-funded project. No Interregional Improvement Program funds have been committed.
- **Redding to Anderson "Little Easy" Six Lane (CTIPS ID No. 211-0000-0101)** – This project takes the original Redding to Anderson Six Lane (RASL) project and funds a smaller four- to six-lane widening phase from 0.6 miles south of the Knighton Road Overcrossing to 0.4 miles south of the Churn Creek Road Overcrossing. The following Regional Improvement Program (RIP) amounts (State Transportation Improvement Program - STIP Advanced Construction) are programmed in the active years: \$658,000 in FY 2014/15 for Preliminary Engineering (PE) and \$16,000 in FY 2015/16 for Right of Way (RW). The total project cost is \$12.796 million.
- **Redding to Anderson Six Lane – Phase 2 (CTIPS ID No. 211-0000-0102)** – This project takes the original RASL project and funds a second four- to six-lane widening component from 0.2 miles south of the North Street Undercrossing to the Knighton Road Overcrossing. The following RIP funds (STIP Advanced Construction) are programmed in the FTIP active years: \$2.482 million in FY 2014/15 for PE, and \$125,000 in FY 2015/16 for RW. The total project cost is \$37.3 million.
- **Grouped Projects for Safety Improvements, Shoulder Improvements, Pavement Resurfacing and/or Rehabilitation – SHOPP Minor Program (CTIPS ID No. 211-0000-0108)** – SHOPP Minor funding of \$909,000 is added to pre-existing project 02-4E270, Extend truck lane near Fall River Mills at 0.2 miles west of Hat Creek Bridge. The project will be combined for construction with SHOPP project EA 02-2E740 to the west.
- **Sacramento River Trail to Downtown Non-Motorized Improvement Project (CTIPS ID No. 211-0000-0110)** – This project adds the local funding (\$110,000) in the active FTIP years for this project to provide non-motorized transportation facilities and improvements in Redding along Riverside Drive, Center Street, and Division Streets—including linking the Sacramento River Trail near the Lake Redding Bridge to the downtown. Future year (FY 2016/17) Regional Improvement Program (RIP) funding (state cash) of \$400,000 is included for information.
- **Browning Street Complete Streets Improvements (CTIPS ID No. 211-0000-0111)** – In Redding, along Browning Street, between Canby and Churn Creek Roads, this project constructs non-motorized transportation facilities improvements. Initially funded with \$50,000 of local funds in the active years of the 2013 FTIP, the project leverages \$275,000 of RIP funding (state cash) for FY 2016/17—shown here for information.

Ms. Rachel Falsetti

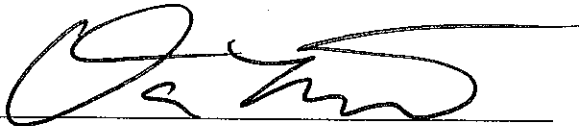
July 11, 2014

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SRTA 2013 FTIP Formal Amendment No. 10 is being provided to Caltrans, the FHWA, the FTA, and is posted on the SRTA website at <http://www.srta.ca.gov>. An electronic copy will be also be transmitted by email.

Please contact senior transportation planner Kathy Urlie at (530) 262-6194, or kurlie@srta.ca.gov, if you have questions.

Sincerely,



Daniel S. Little, AICP, Executive Director
Shasta Regional Transportation Agency (MPO)

DSL/KKU/jac

Attachments: SRTA Resolution Number 13-14 – Delegation Authority for Formal FTIP Amendments
Current and Prior Programming Pages
Grouped Project Listing Tables
Summary of Changes
Financial Tables

C: Wade Hobbs – FHWA, CA Division
Hymie Luden – FTA, Region 9
SRTA Board of Directors
Darren Langfield – City of Redding

Wendy Lonnberg – Caltrans, District 2
Rick Somers – Caltrans, District 2
Chuck Aukland – City of Redding



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

California Division

August 12, 2014

650 Capitol Mall, Suite 4-100
Sacramento, CA 95814
(916) 498-5001
(916) 498-5008

In Reply Refer To:
HDA-CA

Ms. Rachael Falsetti
Chief
Division of Transportation Programming
California Department of Transportation
1120 N Street
Sacramento, CA 95814

Attention: Muhaned Aljabiry

SUBJECT: SRTA MPO 2012/13 FTIP/FSTIP AMENDMENT NO. 10

Dear Ms. Falsetti:

We have completed our review of Amendment No. 10 to the Shasta Regional Transportation Agency (SRTA) 2012/13 Federal Transportation Improvement Program (FTIP) that was submitted by your letter dated July 14, 2014. Amendment No. 10 to the SRTA 2012/13 FTIP, adopted by the SRTA Board by Resolution No. 13-14 on December 10, 2013, modifies three previously approved grouped project listings and one individually listed project; and adds four new individually listed projects in the 2012/13 SRTA FTIP and the 2012/13 Federal Statewide Transportation Improvement Program (FSTIP).

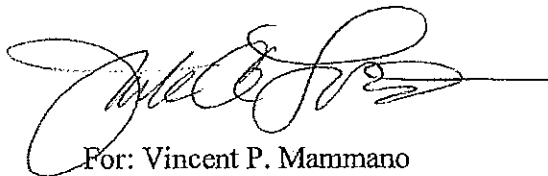
Pursuant to the *July 15, 2004, Memorandum of Understanding between the Federal Highway Administration (FHWA), California Division, and the Federal Transit Administration (FTA), Region IX*, we accept the proposed modifications to the 2012/13 FTIP/FSTIP for the SRTA Metropolitan Planning Organization (MPO) region in accordance with the *Final Rule on Statewide and Metropolitan Transportation Planning* that was published in the February 14, 2007, Federal Register. We find that the SRTA MPO's 2012/13 FTIP, including Amendment No. 10, was developed through a continuing, cooperative and comprehensive transportation planning process carried out in accordance with the metropolitan planning provisions of 23 U.S.C. 134, and 49 U.S.C. Chapter 53 as amended by Public Law 112-141, the "*Moving Ahead for Progress in the 21st Century Act*" (MAP-21).

The changes proposed to the FSTIP by this amendment are associated with projects that are either exempt from the requirements to determine conformity pursuant to 40 CFR 93.126 or 93.127; or are proposed for implementation in areas of the State of California that are designated

as attainment or unclassified for Federal Air Quality Standards, and as a consequence, are not subject to the requirement that an air quality conformity determination be made.

If you have questions or need additional information concerning our approval of this FSTIP amendment, please contact Wade Hobbs of the FHWA California Division office at (916) 498-5027, or by email at Wade.Hobbs@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Vincent P. Mammano", with a long horizontal line extending to the right.

For: Vincent P. Mammano
Division Administrator

DEPARTMENT OF TRANSPORTATION

OFFICE OF THE DISTRICT 2 DIRECTOR
1657 RIVERSIDE DRIVE
REDDING, CA 96001
PHONE (530) 225-3270
FAX (530) 225-2459
TTY 711
www.dot.ca.gov/dlst2/



*Serious drought.
Help save water!*

August 12, 2014

Anthony Foxx, Secretary
U.S. Department of Transportation
Office of the Secretary
1200 New Jersey Ave, SE
Washington, DC 20590

Dear Secretary Foxx:

In April of this year, the City of Anderson and the Shasta Regional Transportation Agency (SRTA) submitted an application for a Transportation Investments Generating Economic Recovery (TIGER) grant for a project to replace an Interstate 5 (I-5) overcrossing of the Union Pacific Railroad (UPR). The project generated much support from the adjacent jurisdictions, chambers of commerce, private businesses, and governmental entities and numerous letters were forwarded to you endorsing the proposal. The California Department of Transportation (Caltrans) Headquarters in Sacramento supported this northern California project on the heavily used I-5 corridor, the backbone of West Coast highway freight transport.

Caltrans, District 2, representing seven rural counties, would like to join these other entities in expressing support for the project proposal. It's a much needed safety improvement to address the UPR overcrossing that **does not meet the minimum safety standards** for both vertical and horizontal clearances from the fast moving trains below. In recognition of the critical nature of the project, the City of Anderson, the County of Shasta, Caltrans, and SRTA have jointly committed **over 55% of the project funding (\$15.9M) needed to fix this rural area issue.**

In the months since the project was submitted for TIGER funding consideration, information regarding crude oil shipments from the Bakken shale formation in North Dakota has surfaced pointing to an estimated 100-fold increase to California from 2012 to 2016, as estimated by the California Energy Commission. All rail lines in the west can expect to be impacted.

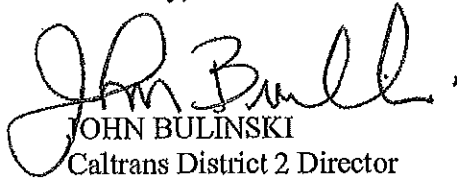
The attached material underscores the urgency of addressing the safety of this commodity's rail shipment. You recognized the impact of these crude oil shipments by issuing the May 7, 2014 US DOT Emergency Order establishing notification conditions on large Bakken crude shipments for railroad carriers. Additionally, on July 23, 2014, you issued the Notice of Proposed Rulemaking (NPRM) for the Safe Transportation of Crude Oil, Flammable Materials.

Mr. Anthony Foxx
August 12, 2014
Page 2

This I-5 / Union Pacific TIGER proposal addresses safety deficiencies of the railroad overcrossing, particularly in the context of train derailments in our region, that will not be mitigated by disclosure requirements of the emergency order, or immediately by the NPRM.

Please consider this new information to the TIGER funding request.

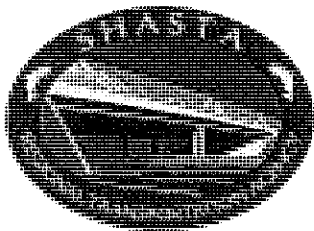
Sincerely,



JOHN BULINSKI
Caltrans District 2 Director

Attachments: June 18, 2014 Record Searchlight Editorial "Railroads need to beef up safety"
July 21, 2014 KQED Science "California Has Little Say Over Oil Train Safety"
July 25, 2014 Rural County Representatives of California Federal Update on
Crude Oil by Rail

c: Mayor James Yarbrough, City of Anderson
Chairman Les Baugh, County of Shasta Supervisors
SRTA Board of Directors



1255 East Street, Suite 202 • Redding, CA 96001 • (530)262-6190 • FAX (530)262-6189
E-Mail srta@srta.ca.gov • HOME PAGE www.srta.ca.gov

Daniel S. Little, Executive Director

August 14, 2014

Carl Guardino, Chair
California Transportation Commission
1120 N Street
Room 2221 (MS-52)
Sacramento, CA 95814

Subject: Incomplete Active Transportation Program (ATP) Scoring

Honorable Chair Guardino:

Let me start by applauding Caltrans and CTC staff for their diligent work on an initial ATP program subject to an aggressive schedule. All seem to recognize many lessons learned and better ways to approach future cycles. We look forward to working with you to that end.

While certain bumps in the initial process are expected, any oversight that results in purely mathematical inequities and an incomplete or random evaluation process should be considered unacceptable. This certainly occurred when some applicants received completed scoring by three evaluators and others did not. A handful of applications likely lost funding due to this administrative oversight. In deference to the hard work by ATP applicants and related public involvement efforts, we request the commission direct staff to complete the evaluation process for those applications where the third score was a difference-maker.

To illustrate, consider the three evaluation scenarios used by staff to recommend the ATP program and compare an example using the same project with the same possible range of scores.

Scenario 1: The project has three evaluations. The three scores are averaged for a final score.

$$90 + 80 + 50 = \text{Score of } 73.3$$

Scenario 2: The project has three evaluations. Low outlier scores were eliminated at the discretion of staff.

$$90 + 80 + 50 = \text{Score of } 85$$

Scenario 3: The project is subject to two evaluations, thereby eliminating an unknown third score. The two scores are averaged. No outlier can be eliminated because it cannot be determined from a field of two.

$$(80 + 50?) \text{ or } (90 + 50?) \text{ or } (90 + 80?) = \text{Random Score of } 65, 70 \text{ or } 85$$

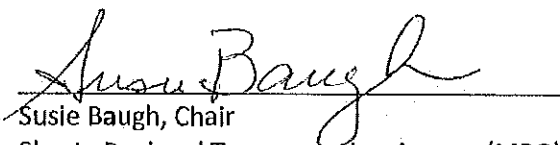
How would you want your project evaluated? Scenario 1 is fair enough and who wouldn't want Scenario 2? No one would pick Scenario 3. It is random and patently unfair with two of the three possible outcomes resulting in lower scores than under Scenario 1 or 2.

Put simply, the applicants forced to Scenario 3 were subject to random outcomes and – based on the math alone – were more likely to receive a lower score than applicants with full evaluations.

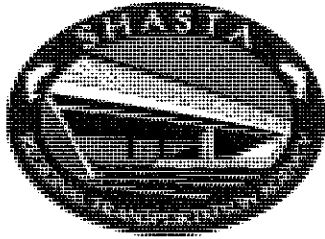
By our count, about a dozen applications subjected to Scenario 3 may have exceeded the grant award threshold had they received a full and complete evaluation. There is no way to know for certain until they receive the benefit of a third score like everyone else. This is unfortunate because those applications with incomplete reviews represent hundreds of hours of work and public vetting only to be dismissed because a third evaluator did not take a couple hours to score the project, nor were there reasonable efforts to substitute with a new evaluator. We know of several volunteer evaluators who would have scored extra applications given a couple days notice. There was time to request this as volunteer evaluations were due in early July.

We recognize the commission needs to adopt an ATP program of projects at the August meeting. That can and should proceed; however, **we also urge the commission to direct staff to complete the evaluation process for those applicants that could have exceeded the funding thresholds with a third score.** Volunteer evaluators stand ready. For those applications determined to meet the award threshold, consider remedies at the next meeting. Since experience has shown us that a large percentage of ATP projects will undergo delays, the handful of projects that could be funded after receiving a complete evaluation could be contingency projects or given priority in the next ATP cycle.

Random, inequitable and incomplete scoring go against the core tenants of an even-handed public grant program and the integrity of the evaluation process. With so much at stake in this highly competitive program, we urge the commission to address this immediately. The countless hours of hard work by ATP applicants, and the extensive involvement by the public, deserve no less than a level playing field.


Susie Baugh, Chair
Shasta Regional Transportation Agency (MPO)

c: Malcolm Dougherty, Director, California Department of Transportation
Andre Boutros, Executive Director, California Transportation Commission



1255 East Street, Suite 202 • Redding, CA 96001 • (530)262-6190 • FAX (530)262-6189
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Daniel S. Little, Executive Director

September 10, 2014

Terry Roberts
Manager, Sustainable Communities Policy & Planning
Air Quality Planning & Science Division
California Air Resources Board
9480 Telstar Avenue, Suite 4
El Monte, CA 91731

Subject: Comments on ARB Preliminary Draft Staff Report, SB 375 GHG Emissions Reduction Target Update Process

Thank you for the opportunity to comment on the first update of the regional greenhouse gas emissions targets pursuant to SB 375. We appreciate the time taken to articulate the various policy issues, background, collateral benefits, early successes, and statutory and regulatory framework.

The following comments have been organized to correspond to the policy and technical considerations discussed in the ARB Preliminary Draft Staff Report.

Policy Considerations:

1. Nature or Magnitude of Targets

- Regarding the target metric and how it's applied, we recommend not reopening what is the result of extensive past work effort, technical process, and statewide interagency consultation. Any practical benefits that might be gained do not justify the time and resources required to revisit this topic, and we believe would represent a distraction and lost opportunity to focus on moving forward with implementation efforts.
- Regarding more aggressive regional targets across the board, SRTA is evaluating reductions beyond its initial targets as part of the region's first Sustainable Communities Strategy. Recommendations for updated targets will be based on technical modeling, cost-benefit analysis, and a candid self-assessment of what might be achieved through concerted regional effort. It is requested that SRTA's initial planning process be allowed to play out before revised targets are considered.

Beyond this, we hope to look at what Shasta County might achieve when yoked in partnership with the state, including ARB. We highlight two examples in this regard:

First, it would be possible to further escalate targets if dedicated and ongoing funds are made available for SCS implementation. Although Active Transportation Program and Cap-and-Trade funds will be distributed, the absence of regional guarantees and consistent allocations make it difficult, if not impossible, to incorporate revenue assumptions and corresponding projects into long-term planning and travel demand modeling.

Second, it is vital that the state back-up the work of MPOs serving on the frontlines of SB 375 implementation. More specifically, we appeal for a more substantive role in project selection in upcoming funding programs. Doing so will reinforce the nexus between collaborative SCS planning and funding. We believe this to be the difference between good projects and game-changing projects that bring about the magnitude of change envisioned by AB 32 and SB 375.

2. Timing and Logistics of Target Updates

- Regarding the timing of updates to regional targets with RTP planning cycles, there are various workable approaches, so long as target revisions do not impact an active RTP process. Target updates should only apply to future planning cycles that have yet to begin.
- The focus of target updates should be on 2035. Adjusting 2020 targets implies an agility in regional and local transportation and land use planning and implementation that simply does not exist.

3. Impacts of Technology and Fuels

- Regions should receive credit for GHG emissions reductions as a result of zero-emission vehicle programs. The targeted expansion of electric vehicle charging stations represents one of the most practical, cost-efficient, and community-supported strategies available to many regions.

4. Engaging Regional and Local Governments

- Regarding the need for ARB to encourage MPOs to work with their local governments early in the process, this work is already occurring. In Shasta County, local agencies have taken part in the earliest analysis, outreach, and planning efforts. Local plans – including general and specific plans – are in turn being developed in consultation with the region. Rather than add additional mandates, ARB could help to identify and share best practices between regions.
- Regarding community engagement, regions have voluntarily gone above and beyond SB 375 requirements. Mandating further activities is not necessary and may take away from best practices unique to individual regions.

5. Providing Community Benefits

- A broad range of benefits – beyond GHG emission reductions – are needed to build community consensus toward implementation of the various projects, programs, and

policies required to achieve regional targets. It is recommended that such benefits continue to be emphasized in state programs and policies.

Technical Considerations:

1. Interregional Travel

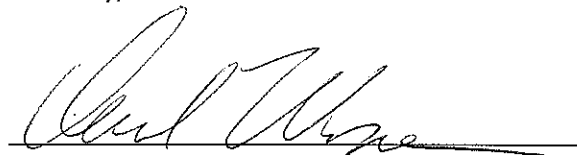
- Regarding interregional travel, SRTA commends efforts to establish a statewide tool (CA Statewide Model or other process) for estimating inter-regional travel between all regions of California. To ensure that the model is sensitive to the travel characteristics of all regions, we encourage ARB to continue to engage transportation modeling experts familiar with the challenges and diversity of rural and small-urban regions on the inter-regional travel working group. SRTA will continue to participate on technical advisory committees and offer input as needed.

2. Modeling tools and assumptions

- Smaller MPOs are hampered by data limitations, such as the small sample size of California Household Travel Surveys. In addition, many strategies being considered in smaller MPOs will require off-model calculations to estimate reductions in VMT and associated greenhouse gas emission. Efforts to identify uniform statewide assumptions for fuel prices, auto operating costs, economic conditions, and other assumptions would further cloud the accuracy of models in smaller MPOs. The update of targets in smaller MPOs will require more inter-agency discussion and a measure of flexibility between regions. We hope to work with ARB to identify the most accurate inputs and assumptions for Shasta County.

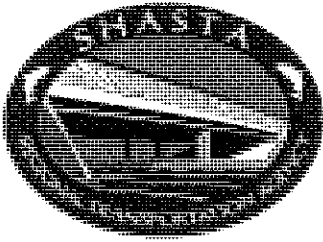
Overall, our experience working with ARB to date has been very positive and we look forward to working collaboratively in achieving California's goals and maximizing secondary benefits. Lastly, we ask that you please update page 7 of the staff report and future documents to reflect our new agency name – Shasta Regional Transportation Agency (SRTA).

Sincerely,



Daniel Wayne, Senior Transportation Planner
Shasta Regional Transportation Agency (MPO)

DTW/jac



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Daniel S. Little, Executive Director

September 25, 2014

Ms. Rachel Falsetti, Division Chief
Department of Transportation
Division of Transportation Programming, MS 82
P.O. Box 942874
Sacramento, CA 94274-0001

Attention: Abhijit Bagde, SRTA FTIP Liaison

Subject: Formal Amendment No. 1 to the Shasta County 2015 Federal Transportation
Improvement Program (FTIP)

Dear Ms. Falsetti:

With the delegation authority provided me by the Shasta Regional Transportation Agency (SRTA) Board of Directors (per attached SRTA Resolution #13-14, dated December 10, 2013), I hereby approve Formal Amendment No. 1 to the 2015 Federal Transportation Improvement Program (FTIP) for forwarding to Caltrans for review and recommendation of approval to the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA).

The amendment is consistent with metropolitan transportation planning regulations per Title 23 Code of Federal Regulations Part 450. As amended, the 2015 FTIP is financially constrained and the attached financial summary confirms that funding is available. Additionally, the amendment is consistent with the Regional Transportation Plan. Shasta County is in conformance with federal air quality standards.

The amendment notification process complied with SRTA's adopted Public Participation Plan. The public review period was from Thursday, September 11, 2014, through Wednesday, September 24, 2014, meeting the requisite two-week review period. There were no comments received. Please note that this formal amendment and public review satisfy the Program of Projects (POP) needed for the Redding Area Bus Authority's (RABA's) use of Federal Transit Administration (FTA) Section 5307 funding.

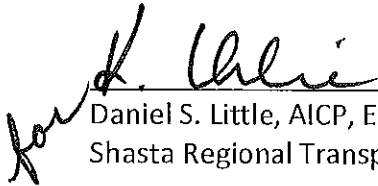
This amendment updates several grouped project listings revised either since the release of the draft 2015 FTIP, or after adoption of the 2015 FTIP on June 24, 2014. Additionally, the RABA's 2014-15 through 2018-19 Transit FTIP and Capital Improvement Program updates are included within this amendment. Amendment No. 1 adds, or revises, the following projects as separate line items:

- **RABA Passenger Loading Facilities (CTIPS ID No. 211-0000-0058)** – Deletes \$208,000 of FTA 5307 funding programmed in Fiscal Year (FY) 2014/15 and adds state Proposition 1B – Public Transportation Modernization, Improvement, and Service Enhancement Account Program (PTMISEA) to FYs 2014/15 through 2017/18.
- **RABA Capital Vehicles (CTIPS ID No. 211-0000-0059)** – Adds FTA 5307 and Proposition 1B PTMISEA funding for FYs 2014/15 through 2017/18 for van and bus replacements, as delineated in the CTIPS revised programming page, including \$20,000 per year of FTA 5307 funding for the capital grant administration.
- **RABA Transit Capital (CTIPS ID No. 211-0000-0060)** – Revises Prop 1B PTMISEA funding for FY 2014/15, and adds PTMISEA and Transit System Safety, Security, and Disaster Response funding for FYs 2015/16 through 2017/18. Adds FTA 5307 funding in FYs 2015/16 and 2017/18. This project also includes PTMISEA funding for maintenance and facility equipment for FYs 2014/15, 2015/16, and 2017/18.
- **Grouped Projects for Safety Improvements – SHOPP Roadway Preservation Program (CTIPS ID No. 211-0000-0078)** – \$1.75M of SHOPP Advance Construction monies are added in FY 2014/15 to fund Interstate 5 signs replacement project in, and near, Redding from 0.1 miles south of Smith Road Overcrossing to 0.1 miles north of East Redding Separation (Project 02-4E790). The project will remove six existing six-post roadside signs and replace them with six overhead signs to address visibility and consistent message concerns.
- **Grouped Projects for Pavement Resurfacing and/or Rehabilitation on the SHS – Highway Maintenance (CTIPS ID No. 211-0000-0090)** – This is a new grouped project listing to the 2015 FTIP. \$3.303M of National Highway System (NHS) monies are added in FY 2014/15 to add a 19.6 lane mile maintenance asphalt overlay project on State Route 44 at, and near, Shingletown from Bear Creek Bridge to Sandhouse Road (Project 0H3001).
- **Grouped Project for Safety Improvements – Highway Safety Improvement Program (HSIP) (CTIPS ID No. 211-0000-0093)** – This amendment revises programming for HSIP-related projects, as included in the attached HSIP grouped project listing table, updated June 2015.
- **Grouped Projects for Safety Improvements Safe Routes to School (SRTS) Program (CTIPS ID No. 211-0000-0095)** – This adjustment includes a programming increase of \$59,000 in FY 2014/15 for the city of Redding's SRTS Bidwell project, as approved by Caltrans, HQ.

With this transmittal, SRTA 2015 FTIP Formal Amendment No. 1 is being provided directly to Caltrans. An electronic copy will be transmitted by email to Caltrans, FHWA, and FTA. The approved amendment will be posted to the SRTA website at <http://www.srta.ca.gov>. Please recommend this formal amendment for Federal State Transportation Improvement Program (FSTIP) approval.

Please contact senior transportation planner Kathy Urlie at (530) 262-6194, or kurlie@srta.ca.gov, if you have questions.

Sincerely,



Daniel S. Little, AICP, Executive Director
Shasta Regional Transportation Agency (MPO)

DSL/KKU

Attachments: SRTA Resolution Number 13-14 – Delegation Authority for Formal FTIP Amendments
Current and Prior Programming Pages
Grouped Project Listing Tables
Summary of Changes
Financial Tables

C: Wade Hobbs – FHWA, CA Division
Hymie Luden – FTA, Region 9
SRTA Board of Directors
Scott Wahl – County of Shasta

Wendy Lonnberg – Caltrans, District 2
Rick Somers – Caltrans, District 2
Chuck Aukland – City of Redding and RABA



North State Super Region Partnership Agenda

September 26, 2014 11:00am – 2:00pm

Special Events Center @ The Lodge At Blue Lakes,
5135 W. Highway 20, Upper Lake, CA 95485

Call in number: **1-(866)-906-9888**

Passcode: **8514637**, followed by #

- 11:00a.m. Welcome and Introductions (All)
- 11:05a.m. Nominate new Chair and Vice Chair
- 11:10a.m. Approval of April meeting minutes (new chair)
- 11:15a.m. Caltrans Sustainable Transportation Planning Grant:
- North State Food Fiber Forest and Bio-Fuel Hub (Dan Wayne)
- 11:35a.m. Active Transportation Program (Marcella Clem, HCAOG)
- Rural performance
 - Comment letter for improvements to ATP
 - Next call for projects
- 12:00p.m. Working Lunch
- 12:15p.m. Human Transportation Coordinated Plan project contract with University of the Pacific
- 1:00p.m. Affordable Housing & Sustainable Communities Program - SGC Cap and Trade Program (Mike McCoy)
- 1:40p.m. NS-TEDs (Jenn Pollom, SRTA)
- 1:45p.m. NSSR Website (Jenn Pollom, SRTA)
- 1:50p.m. NSSR Budget (Jenn Pollom, SRTA)
- 1:55p.m. Next Meeting, Agenda Items and Location