

STAFF REPORT



MEETING DATE: February 26, 2019
SUBJECT: Correspondence
AGENDA ITEM: 8-5
STAFF CONTACT: Amy Lindsey, Executive Assistant

Attached and summarized below is correspondence determined to be of interest to the board of directors.

INCOMING CORRESPONDENCE

Date	From	Subject
10/29/18	Kathy Grah, Chief, Office of Community and Regional Planning, Department of Transportation	Letter of approval for SRTA's FY 2018/2019 Overall Work Program (OWP) Administrative Amendment No. 3
11/29/18	Paul Hellman, Director, Shasta County Department of Resource Management	Letter of support for joint Caltrans Transportation Planning Grant Application
12/17/18	Edward Carranza, Jr., Acting Regional Administrator, Region IX, Federal Transit Administration <i>and</i> Vincent P. Mammano, Division Administrator, California Division, Federal Highway Administration	Letter of approval of 2019 FSTIP and Planning Finding
12/28/18	Erin Thompson, Chief, Office of Regional Planning, Division of Transportation Planning, <i>and</i> Tom Balkow, Planning Deputy District Director, District 2	Confirmation letter confirming unexpended Consolidated Planning Grant funding provided by FHWA and FTA at the end of the 2017-18 fiscal year.
1/15/19	SCAG, SANDAG, MTC, SACOG, AMBAG, BCAG, SRTA, SLOCOG, TRPA, SBCAG, SJCOG, StanCOG	MPO Comments – Draft CARB SCS Program and Evaluation Guidelines

OUTGOING CORRESPONDENCE

Date	To	Subject
11/8/18	Marilee Mortenson, Acting Chief, Office of Regional Planning, Division of Transportation Planning	Response letter regarding the SRTA Single Audit Report (SAR) for FY 2016/17 and Caltrans letter dated 7/2/18 noting a partially resolved finding
11/15/18	Chris Schmidt, Chief, Department of Transportation, Division of Transportation Planning	Response letter regarding the Corrective Action Plan for the Indirect Cost Allocation Plan (ICAP) Audit for Fiscal Year (FY) 2014/15
11/29/18	Tiara Schmidt and Anthony Serna, Department of Transportation	Transit and Intercity Rail Capital Program (TIRCP) Project Reporting Request

12/18/18	Priscilla Martinez-Velez, Senior Transportation Planner, Sustainable Transportation Planning Grants, California Department of Transportation, Division of Transportation Planning, Office of Regional Planning	Amendment Letter to the ShastaReady Extreme Climate Event Mobility and Adaptation Plan
12/20/18	Muhaned Aljibiry, Department of Transportation, Division of Transportation Programming, MS 82, Attention Abhijit Bagde, SRTA FTIP Liaison	Administrative Modification No. 2 to the Shasta 2019 Federal Transportation Improvement Program (FTIP)



Daniel S. Little, AICP, Executive Director

Attachment: SRTA Correspondence Letters

DEPARTMENT OF TRANSPORTATION

1657 RIVERSIDE DRIVE
REDDING, CA 96001
PHONE (530)
FAX (530)
TTY 711
www.dot.ca.gov/dist2/



*Making Conservation
a California Way of Life.*

October 29, 2018

Mr. Dan Little
Executive Director
Shasta Regional Transportation Agency
1255 East Street, Suite 202
Redding, CA 96001

Dear Mr. Little:

Caltrans District 2 is pleased to advise you of its recommendation for approval of the Shasta Regional Transportation Agency's (SRTA) FY 2018/2019 Overall Work Program (OWP) Amendment #3.

We look forward to working with SRTA and continuing the great working relationship between your agency and Caltrans. This approval will ensure that SRTA has their OWP finalized and in place so we can properly reimburse SRTA for all planning work associated with the OWP and its Work Elements.

If you have any questions or comments regarding this matter, please feel free to contact your Regional Planner Aaron Casas, at (530) 225-4732.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathy Grah".

KATHY GRAH
CHIEF, Office of Community and Regional Planning

c: Aaron Casas, Associate Transportation Planner, Caltrans District 2
Tom Balkow, District Deputy Director Planning and Local Assistance
Gilbert Valencia, Associate Transportation planner, Office of Regional Planning
Jackie Karhs, Branch Chief, Office of Regional Planning



Shasta County

DEPARTMENT OF RESOURCE MANAGEMENT
1855 Placer Street, Redding, CA 96001

Paul A. Hellman
Director
Dale J. Fletcher, CBO
Assistant Director

November 29, 2018

Daniel S. Little, AICP, Executive Director
Shasta Regional Transportation Agency (SRTA)
1255 East Street, Suite 202
Redding, CA 96001

Subject: Letter of Support, Joint Caltrans Transportation Planning Grant Application, AMBAG, BCAG, SBCAG, SLOCOG, SRTA & TRPA Integrated Land Use Model and Development Monitoring Framework

Dear Mr. Little:

The County of Shasta Department of Resource Management supports the joint application by the Association of Monterey Bay Area Governments (AMBAG), Butte County Association of Governments (BCAG), Santa Barbara County Association of Governments (SBCAG), San Luis Obispo County Council of Governments (SLOCOG), Shasta Regional Transportation Agency (SRTA), and Tahoe Regional Planning Agency (TRPA) for Caltrans Transportation Planning Grant funding for the Integrated Land Use Model and Development Monitoring Framework for the regional travel demand models of each MPO. In addition to enhanced, more accurate land use modeling and development monitoring capabilities, the proposed land use model will support integration with disaggregated activity-based models. This land use model would be at a mega-regional level and serve as an example of interregional coordination and model enhancement to other small or rural regions throughout the state.

The integrated land use model and development monitoring framework would be much more efficient and useful than current methods, largely because it would capture land use at the parcel level in a standardized format. The software would also serve the County in analyzing trends and making better, more informed decisions in a timely manner for both current and advanced planning projects. AMBAG, BCAG, SBCAG, SLOCOG, SRTA, and TRPA propose a cost-effective solution to develop and implement an integrated land use model and development monitoring framework for the travel demand models of each MPO. The final product of six, fully functional land use models with a development monitoring framework would provide a vital tool to facilitate better regional planning strategies and better coordination of land use and transportation policies with various agencies including adjacent jurisdictions, SRTA, LAFCO, the Shasta County Air Quality Management District, Caltrans, and transit agencies such as the Redding Area Bus Authority (RABA).

RECEIVED

NOV 30 2018

SHASTA REGIONAL
TRANSPORTATION AGENCY
☐ Suite 200
ADMINISTRATION
(530) 225-5789
FAX (530) 225-5807

☐ Suite 101
AIR QUALITY MANAGEMENT DISTRICT
(530) 225-5674
FAX (530) 225-5237

☐ Suite 102
BUILDING DIVISION
(530) 225-5761
FAX (530) 245-6468

☒ Suite 103
PLANNING DIVISION
(530) 225-5532
FAX (530) 245-6468

☐ Suite 201
ENVIRONMENTAL HEALTH DIVISION
(530) 225-5787
FAX (530) 225-5413

Toll Free Access Within Shasta County 1-800-528-2850

Letter of Support, Joint Caltrans Transportation Planning Grant Application

November 29, 2018

Page 2

This effort would further facilitate the development and evaluation of various SCS land use strategies, transportation policies, alternatives, and projects as required under SB 375. This new tool will also enable our agency to better engage with the public during outreach activities. For these reasons, the County of Shasta Department of Resource Management supports the application and is hopeful for its success.

Sincerely,



Paul A. Hellman, Director

PH/DS/rk



U.S. Department
of Transportation

Federal Highway Administration
California Division
650 Capitol Mall, Suite 4-100
Sacramento, CA 95814
(916) 498-5001
(916) 498-5008

Federal Transit Administration
Region 9
90 7th Street, Suite 15-300
San Francisco, CA 94103
(415) 734-9490 – Main

December 17, 2018

In Reply Refer To:
HDA-CA

Mr. Bruce de Terra
Chief, Division of Transportation Programming
California Department of Transportation, MS 82
1120 N Street
Sacramento, CA 95814

SUBJECT: APPROVAL OF 2019 FSTIP AND PLANNING FINDING

Dear Mr. De Terra:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have determined that the State of California's 2019-22 Federal Statewide Transportation Improvement Program (FSTIP) and incorporated Federal Transportation Improvement Programs (FTIP) for the following metropolitan planning organization (MPO) planning areas are based on a continuing, cooperative and comprehensive transportation planning process in accordance with 23 U.S.C. 134 and 135, and 49 U.S.C. 5303 and 5304. The approval of the FSTIP includes the following metropolitan FTIPs that have been incorporated by reference:

1. Association of Monterey Bay Governments,
2. Butte County Association of Governments,
3. Fresno Council of Governments,
4. Kern Council of Governments,
5. Kings County Association of Governments,
6. Madera County Transportation Commission,
7. Merced County Association of Governments,
8. Metropolitan Transportation Commission,
9. Sacramento Area Council of Governments,
10. San Diego Association of Governments,
11. San Joaquin Council of Governments,
12. San Luis Obispo Council of Governments,
13. Santa Barbara County Association of Governments,
14. Shasta Regional Transportation Agency,
15. Southern California Association of Governments,
16. Stanislaus Council of Governments,
17. Tahoe Regional Planning Agency, and
18. Tulare County Association of Governments.

The following are recommendations for transportation planning process improvements that remain outstanding from the December 16, 2016 or earlier Statewide Planning Findings that warrant continued attention in the statewide and metropolitan planning processes in the State of California:

- I. Core MPO Planning Functions: Progress has been made by MPOs in identifying Core Planning Functions within their Overall Work Programs (OWP). However, we encourage Caltrans to continue working closely with the MPOs in their OWP development processes to ensure that the draft and final OWPs include, at a minimum, the following work elements: Overall Work Program, Public Participation Activities, Metropolitan/Regional Transportation Plan, Federal Transportation Improvement Program; Congestion Management Process (required for Transportation Management Areas (TMA) – MPOs over 200,000 in population), Performance-Based Transportation Planning and Programming (Performance Measures), Air Quality Planning and Conformity (in all non-attainment areas for the National Ambient Air Quality Standards as defined by the 1990 Clean Air Act and subsequent changes to those standards) and the Annual Listing of Obligated Projects.
- II. Implementation of Performance-Based Transportation Planning and Programming: Sections 1201 and 1202 of MAP-21 require that the metropolitan and statewide transportation planning processes provide for the establishment and use of a performance-based approach to transportation decision making to support the national goals described in 23 U.S.C. 1509(b) and 49 U.S.C. 5301(c). Each State and each MPO is required to establish performance targets that address the Performance Measures described in 23 U.S.C 150(c) [MAP-21 section 1203].

USDOT issued the schedules for compliance with Performance-Based Transportation Planning since the December 16, 2016 Statewide Planning Finding. We find that in the State of California, compliance with the schedules for PM-1, PM-2 and PM-3 is proceeding satisfactorily. We applaud the diligent efforts of Caltrans and the MPOs in establishing master agreements for conducting the process, the training workshops and outreach, establishing targets for the Performance Measures, and submitting all required data and reports in compliance with the established schedules.

FHWA and FTA recognize that the implementation and full integration of Performance-Based Planning and Programming into the planning and programming processes in California will be a complex task likely to consume a number of upcoming FSTIP and Regional Transportation Plan (RTP) cycles. We will continue during this transition period and after full implementation to work closely with the State, MPOs and transit operators in providing technical assistance and best practices.
- III. Consultation with Indian Tribal Governments and Federal Land Management Agencies: MPOs are required to develop a documented procedure that outlines the roles, responsibilities, and key decision points for consulting with Indian Tribal governments (ITG) and Federal land management agencies (FLMA) pursuant to 23 C.F.R. 450.316(c). The need for MPOs to develop documented procedures for consulting with Indian Tribal

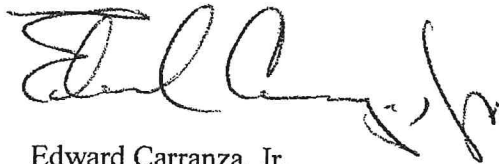
governments and Federal land management agencies continues to be a Federal emphasis area for the MPOs within California.

Progress has been made since the December 16, 2016 Statewide Planning Finding in this area in California, and FHWA and FTA commend Caltrans and the MPOs in the work that has been done to meet requirements. However, to ensure that progress continues in a positive direction, compliance with the requirement for documented consultation procedures will continue to be evaluated by FHWA and FTA as part of the Quadrennial Planning Certification Reviews that are conducted in the TMA MPOs.

- IV. Outstanding Corrective Actions from Quadrennial TMA Planning Certification Reviews:
There is one outstanding Corrective Action identified through the MPO/TMA Planning Certification Reviews since the December 16, 2016 Statewide Planning Finding. Specifically, the Planning Certification Review for one TMA MPO cited the need to update and develop an integrated Congestion Management Process (CMP), including: Definition of the CMP network, measures of congestion, collection of data, and the development of a continuous monitoring process to maintain the CMP and to ensure that the output of the CMP is used in the MPO planning and programming processes.

Accordingly, the Federal Highway Administration California Division and the Federal Transit Administration Region IX offices find that California's 2019-22 Statewide Transportation Improvement Program (FSTIP) is based on a transportation planning process that meets the requirements of 23 U.S.C. Sections 134 and 135 and 49 U.S.C. Section 5303-5306.

Sincerely,



Edward Carranza, Jr.
Acting Regional Administrator
Region IX
Federal Transit Administration



Vincent P. Mammano
Division Administrator
California Division
Federal Highway Administration

cc: (e-mail)

Ted Matley, FTA Region IX

Darin Allan, FTA Region IX

Katrina O'Connor, EPA

Enos Han, FHWA Nevada Division

Morgan Malley, FHWA CFL

Fardad Falakfarsa, Caltrans

Muhaned Aljabiry, Caltrans

cc: (other)

2019 FSTIP I: Drive Folder

I:\Program Development Unit\Planning and Air Quality (2005-Present)\2019 FSTIP Approval

MPO Statewide FTIPs

DEPARTMENT OF TRANSPORTATION

DIVISION OF TRANSPORTATION PLANNING

P.O. BOX 942874, MS-32
SACRAMENTO, CA 94274
PHONE (916) 653-1637
FAX (916) 653-0001
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

December 28, 2018

Mr. Dan Little
Executive Director
Shasta Regional Transportation Agency
1255 East Street, Suite 202
Redding, CA 96001

Dear Mr. Little:

This letter confirms the amount of unexpended Consolidated Planning Grant funding provided by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) available to the Shasta Regional Transportation Agency after the end of the **2017-18** fiscal year:

FHWA Metropolitan Planning (PL):	\$534,493.01
FTA Section 5303:	\$76,831.06
FTA Section 5304 Grants:	
WE 703.05	\$393,899.36
FHWA Partnership Planning Grant:	
WE 706.07	<u>\$27,489.02</u>
Total Consolidated Planning Grant Funds Available:	<u>\$1,032,712.45</u>

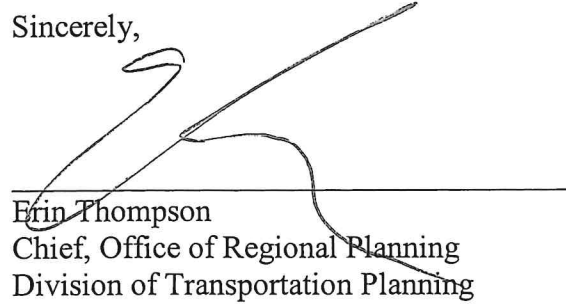
If you agree with the balance shown above, please sign at the bottom of this letter and return the **original copy** to:

Rosie Flores
Chief, Fiscal Management Branch
Office of Regional Planning
Division of Transportation Planning
Department of Transportation
P.O. Box 942874, MS-32
Sacramento, CA 94274-0001

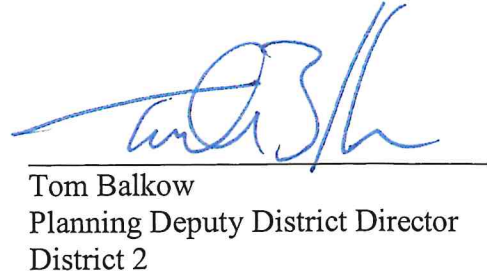
Mr. Dan Little
December 28, 2018
Page 2

If you have any questions or need additional information, please contact Aaron Casas, District 2–
Regional Planning Liaison for Shasta Regional Transportation Agency at (530) 225-4732 or
Gilbert Valencia, HQ Liaison at (916) 653-3076.

Sincerely,

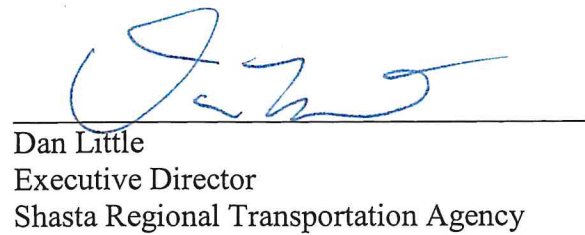


Erin Thompson
Chief, Office of Regional Planning
Division of Transportation Planning



Tom Balkow
Planning Deputy District Director
District 2

I concur with the above balances:



Dan Little
Executive Director
Shasta Regional Transportation Agency

1-16-19
Date



[SUBMITTED ELECTRONICALLY]

January 15, 2019

Steven Cliff
Deputy Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Mr. Cliff:

Re: Draft Proposal for Updated Sustainable Communities Strategy Program and Evaluation Guidelines

With the visible impacts of climate change (sea level rise, increasing fire risk, etc.) affecting our regions, we take SB 375's charge to reduce per capita, passenger vehicle greenhouse gas (GHG) emissions seriously. Each of our Regional Transportation Plans/Sustainable Communities Strategies (RTP/SCS) identifies critical land use and transportation policies to reduce per capita GHG emissions and improve mobility in our respective regions - all against a backdrop of worsening affordability for many California residents. These plans are developed through deep engagement with local jurisdictions, transportation partners, and members of the public. To date, CARB has determined that each of our MPO's RTP/SCS, if implemented, would meet the applicable GHG emission reduction targets.

After more than ten years of SB 375 implementation experience, we, the state's 18 metropolitan planning organizations (MPOs) are uniquely qualified to articulate the benefits and challenges of the proposed Sustainable Communities Strategy Program and Evaluation Guidelines ("Guidelines"). Thank you for the opportunity to comment. This letter represents the collective comments of the state's 18 MPOs.

We anticipate additional MPO-specific comments may be submitted by individual MPOs.

Overarching Comments

1. Make a clear distinction between SB 375 and SB 150 requirements within the Guidelines.

The SCS is a forward-looking plan, that if implemented, would meet applicable 2020 and 2035 GHG emission reduction targets. SB 375 requires CARB to accept or reject the MPO's determination that the strategy (SCS or APS) would, if implemented, achieve the greenhouse gas emission reduction targets established by CARB. SB 150, on the other hand, requires CARB to develop a report that assesses the progress made by our regions (a look back) in meeting the GHG emissions reductions targets, while recognizing the role the state legislature plays in establishing supportive state policy and funding allocations. SB 150 reporting is intended to inform the state legislature of SB 375 best practices in addition to program needs and challenges. The December 2018 Joint CARB/CTC Meeting MPO presentation¹ is the first to highlight best practices and recommend changes to state policy to overcome the identified challenges.

SB 375 and SB 150 focus on the same SB 375 targets; however, they vary greatly in content and timeframe for their respective analyses (RTP/SCS – 2020 and 2035; SB 150 – existing conditions). These differences are important when articulating the requirements of SB 375 and SB 150 in the Guidelines.

Why does this matter? Our respective RTP/SCSs are required to be updated every four-years. During that update, each MPO reviews its planning assumptions to ensure they capture changes that have occurred since the last plan in areas like: population growth, household income, housing and employment growth and distribution patterns, how applicable RTP/SCS strategies have been implemented, and much more. This review is conducted, to ensure, the updated RTP/SCS, if implemented, will meet the target, if there is a feasible way to do so. Although this process represents a look back, similar to SB 150, it ensures the RTP/SCS will meet the 2020 and 2035 targets (i.e. a plan assessment with course correction, as necessary, to meet the target).

SB 150 also acknowledges that successful implementation of an RTP/SCS is a collaborative effort between the MPO, local jurisdictions, and the state. The SB 150 report provides data-

¹ http://www.catc.ca.gov/meetings/joint-meetings/CTC-ARB%20Meetings/12418%20Joint%20meeting%20-%20Los%20Angeles/120418_MPO_Presentation.pdf

driven information to the Legislature for its consideration as part of future policy development supportive of SCS implementation.

“SB 375 empowers regions to develop innovative strategies as part of their SCS to meet their target. While there are requirements for information the SCS must contain including identifying areas for future development and housing, information on resources and farmland, and integrating development with the transportation network, it does not prescribe any one strategy for achieving the targets... The success of some strategies may also rely on state actions, such as increased funding to support transit and other transportation options or authorization of new policies, such as roadway pricing².”

Unfortunately, the Guidelines are not always clear in the distinction between SB 375 and SB 150. We request CARB update the Guidelines to articulate the distinctions between SB 375 and SB 150 requirements. Specific examples and recommended edits can be found below in the *Specific Comments* section of this letter.

2. **Develop Consensus for Incremental Progress among the state’s four largest MPOs.** The four largest MPOs seek to work with CARB to develop a mutually agreeable way to report what strategies have changed—and constraints have emerged—since the adoption of the preceding RTP/SCS. Each MPO already reports progress to its respective board, but in a slightly different format. From the view of the largest MPOs, the interests of all parties are best served by a methodology that allows for meaningful information-sharing that accounts for regional differences. Although the Guidelines propose that MPOs may voluntarily conduct the Incremental Progress Analysis; they omit the flexibility or a way to account for regional differences. As a result, the methodology in the Incremental Progress Analysis should be improved. The large MPOs are willing to commit the staff time and resources to work with CARB staff to develop a meaningful methodology.
3. **Requiring 14 of the state’s 18 MPOs to report Incremental Progress is inconsistent with SB 375 and CARB’s March 2018 target setting board action.** ARB staff stated, “*Staff does not propose any revisions to the October proposal for the 8 San Joaquin Valley MPOs nor for the 6-small remaining MPOs³.*” during its December 2017 informational board update.

This statement was further clarified in the March 2018 SB 375 Final Target Setting staff report that the CARB approved.

“CARB staff presented this revised proposal as an informational update to the Board on December 14, 2017. The initial feedback received on this revised

² SB 150 Bill Analysis: https://leginfo.ca.gov/faces/billAnalysisClient.xhtml?bill_id=201720180SB150, August 2017.

³ J&K court Reporting, Dec 2017 (page 13) - <https://www.arb.ca.gov/board/mt/2017/mt121417.pdf>

approach from the Board and from stakeholders who attended that meeting was overwhelmingly positive.”

We concur that it is appropriate to highlight new or enhanced strategies adopted in the pursuit of meeting SB 375 goals, but the required Incremental Progress reporting is beyond the scope of SB 375 and the March 2018 CARB Board action. For this reason, the 14 MPOs request the section omit reference to the eight San Joaquin Valley and “Small Six” MPOs.

4. **Equity is a guiding factor throughout the RTP/SCS planning process.** Thank you for acknowledging the equity component to pricing strategies (Table 1. SCS Strategy and Key Action Examples, page 26). As each of our respective MPOs complete our RTP/SCS social equity analyses, we would like to highlight that each of the strategies within this table has the potential to have complex and significant equity considerations. Each of our equity analyses takes a full picture view of the RTP/SCS to ensure compliance with Title VI of the Civil Rights Act, Executive Order 12898, and the contracted agreements that all MPOs have entered into with Federal Department of Transportation agencies, which require that the programs, policies or actions stemming from our respective RTP/SCSs do not cause disproportionate effects on low-income populations or disparate impacts on minority populations. MPOs take great strides to include the voices (through public participation and outreach efforts) of low-income and minority communities throughout our planning and decision-making processes. A select set of MPO examples are included in Attachment 1 of this letter.

Additional highlights of individual MPO efforts can be found in each of our respective RTP/SCSs and Public Participation Plans. Appendix L of the California Transportation Commission’s 2017 RTP Guidelines for MPOs also contains additional planning examples.

5. **Significant concerns regarding the technical efficacy of the proposed Elasticity Analysis.** We request the elasticity analysis be removed from the SCS Determination Element Screening Criteria of the guidelines for three reasons. First, in general, studies such as the CARB GHG Policy Briefs include elasticities for varying geographic areas, all of which may or may not be comparable to an MPO region. For example, some studies use national, city, or even international level data to determine a range of elasticities. Each of these studies is caveated. For example, CARB’s website includes *The Impacts of Traffic Operations on Passenger Vehicle Use and Greenhouse Gas Emissions: Policy Brief*, which includes the following caveats related to how applicable the study is to varying locations, vehicle fleet mixes, etc.

“The limited number of studies of each type of strategy, variations in methodology as described above, and variations in the applications studied with respect to both strategy design and context contribute to significant uncertainty as to the size of the effect of traffic operations strategies in any particular application... The estimated effect sizes shown in Table 1 apply to specific geographic areas and time periods and may not be applicable to other areas or time periods.”

Under the proposed Elasticity Analysis, there may be situations where due to research/elasticity limitations for a specified MPO strategy (i.e. research has not established an apples-to-apples elasticity; the geography of the elasticity does not match the geography of the MPO strategy, etc.), CARB staff, may choose/be required to apply a method even if the assumptions do not exactly match the specific conditions of the MPO strategy, this may result in significant errors. With regard to this, the California Air Pollution Control Officers Association's (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* states, "*It is imperative that any deviations are clearly identified. While you may still be able to calculate a reduction for your measure, in many cases the error in your result will be so large that any conclusions you would draw from the analysis could be completely wrong.*"

Second, while acknowledging the elasticity approach cannot account for synergistic effects or spatial location of strategies, the guidelines do not include justification for the use of 85 percent as the threshold for checking the model-based results.

Lastly, if CARB is able to resolve the comments raised above; and the CARB Policy Briefs are intended to be used as a reference for the proposed Elasticity Analysis in the guidelines, additional analysis is necessary to ensure that the elasticities are: (1) related to passenger vehicle GHG, as opposed to some other metric (e.g. total VMT, which includes larger vehicles); (2) that the ranges of elasticities and uncertainties about to their applicability to SB 375 targets are acknowledged; and (3) that allowances are offered for some of the SB 375 specifics, such as exclusion of through-travel. If CARB is unable to resolve the concerns raised above, we request CARB remove the Elasticity Analysis from the SCS Determination Element Screening Criteria of the Guidelines.

We also would like to thank CARB for acknowledging within the Guidelines that the elasticity analysis is unable to distinguish the contribution of individual projects and does not intend to establish any causal relationship between performance indicators and regional VMT.

6. **Capturing TNC data mode share requires data sharing.** While not a specific change to the Guidelines, CARB should encourage the California Public Utilities Commission (CPUC) to require Transportation Network Companies (TNCs) to share key data that supports better policy determinations. The Guidelines presume the availability of TNC data by stating that the use of such data is a "preferred approach" for several variables. Page 37 of the CARB SB 150 report highlights, "*Transportation Network Company (TNC) trip-level data is not available to State, regional, and local public agencies, nor to academic researchers in California.*" Accordingly, CARB should support MPOs through the CPUC rulemaking process to ensure each of our agencies has ongoing access to the data necessary to analyze the TNC market sector and its impacts and benefits to congestion and multimodal performance consistent with the guidelines. Ready access to TNC data would allow MPOs to analyze TNC usage to more accurately represent the growing TNC mode share in regional travel demand models and

determine if MPO policies and transportation funding are meeting state-mandated GHG emissions reduction targets.

Unfortunately, TNCs have been reluctant to share this data. Without data, it is difficult for MPOs to ascertain the share of TNC trips -- single and pooled -- as listed in the table of independent exogenous variables. Until such time as this data is required to be consistently shared on an ongoing basis, Table 4 and 6 should be updated with the phrase, “where available and sufficient for forecasting purposes”.

7. **Overall SCS Program Evaluation.** On page 44, the draft Guidelines indicate that if there is insufficient evidence to explain or overcome a deficiency in any of “the assessments,” ARB may reject an MPO’s determination that GHG targets will be met. (The “assessments” referenced are apparently five Policy Commitments analyses: trend, elasticity, policy, investment, and plan adjustment.) Thus, ARB may find that four of five analyses strongly support the MPO’s determination, but one does not, potentially leading to an unjustified rejection of the MPO’s determination. The MPOs recommend ARB consider and balance findings of all five analyses before accepting or rejecting an MPO’s determination.

Specific Comments

- **Please add a glossary of key terms to the document.** Terms such as “strategy, commitment, attribute, and policy” have multiple meanings in the context of the Guidelines. For example, the term “strategy” can be used to describe an individual project, such as the construction of a bike lane or a higher-level policy such as increase density by X percent. We request the addition of a glossary of terms to ensure we are all operating from the same definition for purposes of SCS review.

In addition, we request additional clarity be provided for the phrase “tracking implementation needs.” We request CARB clarify whether its interest is “strategy implementation” (are policies in the plan being implemented?) vs “on-the-ground progress” (are we implementing capital projects and building housing/jobs in line with the forecasted development pattern?) For example, inclusionary zoning is a “strategy.” Affordable housing is the thing “on the ground.” This nomenclature is unfortunately a bit confusing. The Guidelines seem to use strategies and outcomes often to mean the same thing when they do not. As mentioned above, a glossary of terms would be beneficial.

- **Global Guidelines comment – Tracking Implementation (SB 150 Reporting) Element.** Each reference to the Tracking Implementation Element should be titled in the same manner. This helps distinguish SB 150 tracking implementation, from the SCS planning assumption review and update discussed earlier in this letter. Specific locations for update are identified below.

- Page 6, first paragraph, last sentence.
 - Page 20, third bullet.
 - Page 23, first, bullet.
 - Page 30, title of first box
- **Figure 1, first box, Tracking Implementation, page 6.** Please update the text to read, *“Report on the progress regions have made towards meeting their SB 375 GHG reduction targets (SB 150 Reporting).”* This ensures consistency with other references throughout the document.
 - **Second to last full paragraph, first sentence, page 23.** Please update the text to read, *“CARB has enhanced the SCS program, and evaluation framework to include a new component to track implementation (SB 150 Reporting).”*
 - **First Bullet, Tracking Implementation, page 23.** SB 150 Report – The Guidelines should clarify whether the SB 150 report will be used to track implementation (Statewide, every 4-years on September 1st) or separate reporting will be done by MPO with each SCS determination (MPO focused, every 4 years when RTP/SCS is approved).
 - **What is CARB looking for in an SCS, Policy Commitments (Determination Element), page 23.** A concern over the long-term is that CARB is not taking enough account of electric and zero emission vehicle implementation. The result is that resources that could be spent on fast-to-implement strategies like workplace electric vehicle charging stations and RNG fueling infrastructure may be allocated to less efficient strategies. Early reductions have the greatest long-term effect to slow climate warming. The SB 150 report demonstrates that other strategies—like land use change (where it often takes years or decades to realize across-the-board reductions)—are less likely to provide early reductions in gasoline consumption. To be sure, we need to continue to build and expand land use and walkable community strategies that benefit public health. But in specific terms of quickly and efficiently reducing GHG emissions, vehicle technology improvements will have a greater immediate effect (and have the co-benefit of reducing criteria pollutants faster).
 - **Strategy Performance Indicators (Outcomes), page 28.** Seat utilization is affected by policy decisions at the local level, in terms of service goals. Some agencies may decide that larger vehicles are important to meet peak loads, even though those same vehicles might be underutilized in the off-peak. Other agencies might make the opposite decision. Local agencies should have discretion to decide these issues to meet their local transit service goals. As a result, load factors are important at the route level, or perhaps the transit/local agency level.
 - **First bullet under “The MPOs should also submit the following information:”, page 26.** Please update the language in the first bullet to read, *“MPO’s adopted ~~land-use-allocation~~ forecasted development pattern (total new population growth, housing growth, and*

employment growth) mapped or tabulated by place type or sub-regional geography as appropriate to each region.” Land use allocation is a term synonymous with local general plans. The term forecasted development pattern is synonymous with RTP/SCSs and recognizes that local jurisdictions retain land use authority under the California Constitution.

- **First sentence, page 29.** Please update the text to read, “*For the ~~land-use-allocation~~ forecasted development pattern...*”
- **Last sentence before Tracking Implementation (SB 150 Reporting) section, page 31.** Please update the text to read, “*The transportation project list and ~~land-use-allocation~~ forecasted development pattern...*”
- **Land Use and Housing Policy, page 36.** Please update the first sentence of this section to read, “*CARB staff will qualitatively evaluate the relationship between the SCS’s ~~and relevant MPO land Use and housing activities and actions~~ forecasted development pattern and adopted SCS key actions*”.
- **Transportation project list, last bullet, page 28.** Our MPOs are happy to submit the requested transportation project list; however, we request some flexibility in the format. For example, some MPO project lists are an InDesign file that is made publicly-available as an Adobe Acrobat .pdf file and in EXCEL format that could lose content in the conversion process. We presume, CARB staff will be flexible in working with MPO staff to gather the requested information.
- **Tracking Implementation Table, Page 30.** It is unclear whether the Tracking Implementation (Reporting Element) box on page 30 refers to the SCS or the SB 150 report. Assuming a consistent naming convention throughout the Guidelines, please update the title of the Tracking Implementation (Reporting Element) box to Tracking Implementation – SB 150 Reporting (Reporting Element).
- **Third sentence, Transportation Policy, page 36.** Please update the sentence to read, “*On the other hand, ~~not reflecting~~ assessing short- and long-run impacts, as applicable, of capacity and associated induced VMT in the region’s ~~travel demand modeling~~ analysis suggests to CARB that the SCS may be at risk of not meeting its GHG emission reduction targets.*” This edit ensures the Guidelines are consistent with OPR’s *Technical Advisory on Evaluating Transportation Impacts in CEQA*⁴. OPR’s Technical Advisory includes a list of projects not likely to lead to a substantial or measurable increase in vehicle travel that generally do not require an induced travel analysis and allows for non-modeling approaches.

⁴ OPR Technical Advisory on Evaluating Transportation Impacts in CEQA; http://opr.ca.gov/docs/20181228-743_Technical_Advisory.pdf; Page 24

In addition, the Technical Advisory states, “Given that lead agencies have discretion in choosing their methodology, and the studies on induced travel reveal a range of elasticities, lead agencies may appropriately apply professional judgment in studying the transportation effects of a particular project.” We presume this same level of discretion will be allowed to meet the intent of the Guidelines and request that this language be added to the Guidelines for clarification.

- **Second sentence, Pricing Policy, page 37.** Please update to read “Moving forward, to the extent that a proposed statewide road user price replaces the current state fuel excise tax, Statewide road user pricing is an example of a potential future State-initiated strategy that an MPO should not use to demonstrate compliance with the SB 375 GHG emission reduction targets. However, the MPO could demonstrate compliance with the SB 375 targets by use (1) its ability to make reasonable assumptions about revenues appropriated to the MPO from a proposed road user pricing that that could be reinvested to further the region’s SCS; or (2) the other effects of road user pricing in excess of the current state fuel excise tax.”
- **First full paragraph, TIP Funding Assessment, page 38.** Please delete this paragraph. At the time of SCS review, the federally approved TIP considered by CARB would have been adopted under the existing federally approved RTP/SCS, and not the SCS under CARB’s review. This means, new or enhanced RTP/SCS strategies may not be included in the TIP subjected to the proposed CARB review.

The SB 150 report notes the difficulty in compiling short-term investments for comparison with long-range investments. In the section titled “*WHAT DO WE NOT KNOW YET, AND WHERE IS ADDITIONAL WORK NEEDED?*” CARB states: “*Transportation spending is administered and tracked by many different agencies, but these spending streams are not compiled to help understand whether current investments align with long-term goals. In order to verify investments in long-range RTPs are being implemented through short-term spending, there is a need for better compilation of the different short-term spending streams.*” The Guidelines’ proposed investment analysis does not deal with the fact that many of the investments in bike/pedestrian facilities (and some transit improvements) are made solely with local funding or formula funding through the state. The TIP generally identifies federally funded projects and projects funded through the State Transportation Improvement Program, not locally funded projects.

As an example, review of the TIP as the primary means to determine short-term RTP/SCS implementation may lead to incorrect conclusions regarding transit investments. Except for preventative maintenance costs, transit operations are not federally eligible expenses for

many transit operators across the state⁵. This means an analysis of TIP investments may not capture the RTP/SCSs full short-term commitment to funding transit operations.

While the TIP is one of many tools that describes short-term investments, it should not be used to generate overarching assumptions about an MPOs commitment to fund the strategies contained within its RTP/SCS for the reasons listed above. Although, we request this paragraph be deleted from the Guidelines our MPOs are committed to working with CARB staff to identify a full picture of RTP/SCS supportive investments.

- **Third sentence, Plan Adjustment Analysis, page 38.** To ensure consistency across the CARB Determination Elements of the Guidelines, please make the following edit: *“If CARB staff determines that an MPO is not hitting milestones with respect to SCS implementation, to give CARB staff the assurances it needs to determine that a region is capable of meeting its 2035 GHG emission reduction targets, CARB staff will look to the MPO for evidence that the MPO has considered these challenges and has either changed its strategy, or is putting measures in place to accelerate implementation in order to stay on track, as necessary to meet the target, if applicable”*
- **Overall SCS [Program] Evaluation, pages 44, 47-51.** As noted in the Guidelines, some data is more readily available than other data. As a result, we raise concerns about the ability of all 18 MPOs to produce model data for all the performance indicators listed and presume as the Guidelines imply, CARB staff will work with our respective staffs to prioritize data needs based on available resources. In addition, we request CARB provide clarification on the following indicators: seat utilization, household VMT (is this MPO household or MPO resident? Are group quarters included? E-I included? Visitors?).
- **MPO Data Submittal Table to CARB, pages 47-51.** We appreciate the Guidelines acknowledgement that one size does not fit all and that *“These guidelines include CARB’s request for information/data that may be more readily available for some MPOs to provide than for others.”* The MPO Data Submittal Table contained in the Guidelines is an example where one size may not fit all. Consistent with CARB’s first two rounds of RTP/SCS review, we presume CARB staff will be flexible in allowing updates to the table should data be unavailable or not applicable. A few limited examples where adjustments to the table may be necessary include, the applicability of tolls within a given MPO region or the availability of bike and pedestrian lane mile data.
- **Timeline for submittal of SCS Technical Methodology, page 55.** Thank you for acknowledging the iterative development process of our RTP/SCSs. We appreciate the

⁵ Note: Transit operators serving an urban area with a population over 200,000 cannot use many Federal Transit Administration fund sources to pay for transit operations.

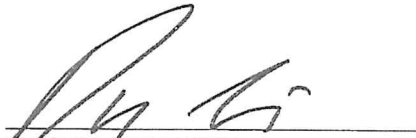
flexibility to amend the technical methodology document as additional information becomes available.

- **Transit and Active Transportation Sensitivity Test and Reporting, pages 61-63.** Some of the performance indicators may be calculated differently by different regions due to differences between the respective MPO travel demand models. For example, a commute travel time could be calculated as home to work, but if a stop is made (dropping off kids at school) is the travel time measured from school to work, or home to work including the drop-off, or some other measure. Each MPO will report the applicable performance indicator consistently within their data, but some performance indicators may not be comparable across MPOs due to the definition applied.
- **Innovative Mobility Discussion page 63.** Thank you for highlighting the limited (and quite different) studies done on the impact of VMT and GHG reductions from innovative mobility strategies, including ride hailing. We encourage CARB to continue this dialogue with our collective staffs.
- **Definitions of Transit Operation Miles and Daily Service Hours, page 66.** The definitions of transit operation miles and transit daily service hours should specify whether these are revenue hours and revenue miles. We recommend using the National Transit Database definitions provided in the link below:

<https://www.transit.dot.gov/ntd/national-transit-database-ntd-glossary>
- **Trip and Emissions Data Needs, page 84.** MPO staff assume CARB will allow discretion as MPOs refine their off-model methodologies as technology evolves or more specific MPO data becomes available. We recommend adding this clarifying language in the guidelines. In many cases as with the carshare/bikeshare/pooled rides off-model strategies, the services are operated by private transportation service providers, which may be unwilling to share data needed to regularly monitor/track program Operations as the Guidelines indicate. A statement in the guidelines recognizing this issue would be helpful.

Thank you for the opportunity to comment. Please feel free to reach out to our staffs should you have any questions regarding the comments raised in this letter.

Sincerely,



DARIN CHIDSEY
Interim Executive Director, SCAG



HASAN IKHRATA
Executive Director, SANDAG



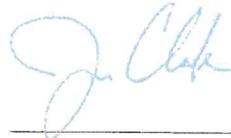
STEVE HEMINGER
Executive Director, MTC



JAMES CORLESS
Executive Director, SACOG



MAURA F. TWOMEY
Executive Director, AMBAG



JON CLARK
Executive Director, BCAG



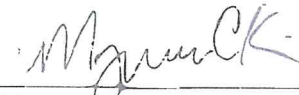
DAN LITTLE
Executive Director, SRTA



PETE RODGERS
Executive Director, SLOCOG



JOANNE MARCHETTA
Executive Director, TRPA



MARJORIE KIRN
Executive Director, SBCAG



ANDREW T. CHESLEY
Executive Director, SJCOG



ROSA PARK
Executive Director, StanCOG



STACIE DABBS
Executive Director, MCAG



PATRICIA TAYLOR
Executive Director, MCTC



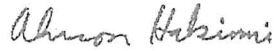
TONY BOREN
Executive Director, FresnoCOG



TED SMALLEY
Executive Director, TCAG



TERRI KING
Executive Director, KCAG



AHRON HAKIMI
Executive Director, KernCOG

Attachment (1)

- **Sacramento Area Council of Governments (SACOG).** SACOG developed an enhanced methodology for identifying disadvantaged communities and a framework for conducting its environmental justice analysis of these communities in the Sacramento region. The method and analysis will inform SCS development for the 2020 plan update and be available as a template for cities and counties in the region as they implement SB 1000. SACOG convened an equity working group to inform and vet these method and analysis.
- **San Diego Association of Governments (SANDAG).** As part of the 2019 Regional Plan development process, SANDAG established a [Community-Based Organizations \(CBO\) Working Group](#). The Working Group, which is comprised of representatives from 12 CBOs serving underserved/disadvantaged communities in the San Diego region, provides a collaborative open and public forum, while allowing SANDAG the opportunity to receive ongoing public input from disadvantaged or underrepresented communities in the region into key activities associated with developing the 2019 Regional Plan with a focus on the social equity perspective.

The Working Group provides input and direction on Regional Plan components, such as the definition of a disadvantaged community, the social equity analysis, and the network development process. The Working Group also played a large role in developing SANDAG's Social Equity Analysis Framework, which was approved by the Board of Directors on [June 22, 2018](#). The Social Equity Framework serves as a guide for assessing the distribution of benefits and burdens of the transportation network. As a complement to the CBO Working Group, SANDAG convenes a monthly CBO Outreach Team meeting. The Outreach Team meeting provides the contracted CBOs a time to discuss how best to engage the respective underserved/underrepresented communities in the planning process, and how SANDAG can assist in the process via education or resources. At these meetings, the Outreach Team also shares the feedback and input received directly from the community given the different plan milestones.

- **Southern California Association of Governments (SCAG).** SCAG's equity (Environmental Justice) analysis addresses equity from multiple dimensions (e.g., access to opportunities, housing equity, health equity, environmental impacts & climate vulnerability, among others) as impacted by the RTP/SCS. The 2016 EJ analysis was conducted through 18 performance indicators. To further improve the 2020 EJ process and analysis, SCAG established an Environmental Justice Working Group in April 2018 to broaden input from stakeholders on an on-going basis. In addition, SCAG also is in the process of engaging with CBOs throughout the region to gauge concerns and priorities from the disadvantaged communities and develop scenarios for the Connect SoCal (2020 RTP/SCS).
- **Tahoe Regional Planning Agency (TRPA).** Hosted community "Tahoe Talks" meetings to discuss transportation, local government, and the economy in Tahoe. Organized public

workshops and pop-up tents out in the community at popular shopping destinations, senior centers and transit centers with bi-lingual speaking staff to gather feedback and distribute the unmet transit needs (UTN) surveys. Organized and hosted meetings of the Social Services Transportation Advisory Council (SSTAC) – a committee whose representation includes transit users over 60, individuals with disabilities, social service agencies that provide services to seniors, individuals with disabilities, and individuals of limited means - to inform on current transportation projects and gather unmet transit needs feedback. Facilitated bicycle rodeos with the local police department to educate students on bicycle safety.

- **Fresno Council of Governments.** Fresno COG's mini-grants to social and environmental justice organizations to assist in land use scenario development among minority and low-income populations. Collectively, those efforts yielded more than 3,000 votes and comments on RTP projects and SCS scenarios throughout that region.

Additional highlights of individual MPO efforts can be found in each of our respective RTP/SCSs and Public Participation Plans. Appendix L of the California Transportation Commission's 2017 RTP Guidelines for MPOs also contains additional planning examples.



1255 East Street, Suite 202 • Redding, CA 96001 • (530) 262-6190 • Fax: (530) 262-6189
E-mail: srta@srta.ca.gov • Website: www.srta.ca.gov

Daniel S. Little, Executive Director

November 8, 2018

Marilee Mortenson
Acting Chief
Office of Regional Planning
Division of Transportation Planning
PO Box 942874
Sacramento, CA 94274

Dear Ms. Mortenson:

In response to your letter in regard to the Shasta Regional Transportation Agency (SRTA) Single Audit Report (SAR) for fiscal year 2016/17 and the Caltrans letter dated July 2nd, 2018 noting a partially resolved finding – SA2017-00. Shasta Regional Transportation Agency (SRTA) respectively submits the following corrective action plan to fully resolve the finding:

FINDING 1 – SA2017-00

Corrective Actions:

Caltrans A&I recommended that SRTA ensure compliance with the recommendations within the SAR and requested that SRTA implement the following corrective actions:

- SRTA must adopt more stringent policies and procedures requiring their local jurisdictions to submit the required information timely.
- SRTA must improve the control environment over the reporting requirement and sub-recipient monitoring.
- SRTA must improve their monitoring activities to ensure quarterly progress reports are submitted timely.
- SRTA must impose necessary sanctions on local jurisdictions for not following SRTA's policies.

Corrective Action Plan Response

SRTA will adopt updated sub-recipient policies in December of 2018. The policy update will include that SRTA will withhold payments on invoices until the local jurisdiction submits the required progress report information.

SRTA has improved the control environment over the reporting requirement and improved sub-recipient monitoring activities to ensure quarterly reports are submitted timely. SRTA has implemented a series of reminders in FY 2017-18 for each quarterly invoicing period to request quarterly narratives and invoices from sub-recipients. This has resulted in more timely responses from sub-recipients.

Please contact us should to have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Little', is written over a horizontal line.

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

DEPARTMENT OF TRANSPORTATION**DIVISION OF TRANSPORTATION PLANNING**

P.O. BOX 942874, MS-32
SACRAMENTO, CA 94274
PHONE (916) 653-1637
FAX (916) 653-0001
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

October 3, 2018

Ms. Monika Long, CPA
Chief Financial Officer
Shasta Regional Transportation Agency
1255 East Street, Suite 202
Redding, CA 96001

Dear Ms. Long:

This letter is in regard to the Shasta Regional Transportation Agency (SRTA) Single Audit Report (SAR) for fiscal year 2016/17. The California Department of Transportation (Caltrans) Independent Office of Audits and Investigation (A&I) determined in a letter dated July 2, 2018 that SRTA has a partially resolved finding – SA2017-00. In the finding, SRTA's independent certified public accountant (CPA) indicated quarterly progress reports were submitted after the due dates and the reason for the delay was SRTA's difficulty in collecting quarterly progress reports from local jurisdictions.

Caltrans agrees with the CPA's recommendations for the Single Audit Report Finding and requests that SRTA implement the following corrective actions:

- SRTA must adopt more stringent policies and procedures requiring their local jurisdictions to submit the required financial information timely.
- SRTA must improve the control environment over the reporting requirement and sub recipient monitoring.
- SRTA must improve their monitoring activities to ensure quarterly progress reports are submitted timely.
- SRTA must impose necessary sanctions on local jurisdictions for not following SRTA's policies.

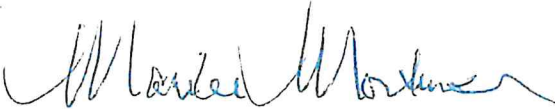
Caltrans requests that SRTA provide a corrective action plan outlining how and when the above corrective actions will be implemented. Failure by SRTA to submit the corrective action plan to Caltrans within 60 days of this letter will result in Caltrans not approving SRTA's FY 2019-20 Overall Work Program. Caltrans has consulted with FHWA and FTA regarding the above course of action.

Ms. Monika Long
October 3, 2018
Page 2

SRTA's progress with regards to the corrective actions and final resolutions will be closely monitored by Caltrans staff, including any follow-up audit work that may be performed. Additionally, all support documentation and corrective actions provided by SRTA will be reviewed by Caltrans staff.

We appreciate SRTA's cooperation and coordination during this process. If you have any questions, please contact Jacqueline Kahrs, Senior Transportation Planner, Office of Regional Planning, Division of Transportation Planning, at (916) 653-9255.

Sincerely,



MARILEE MORTENSON
Acting Chief
Office of Regional Planning

bcc: Tashia Clemons, Director of Program Development, Federal Highway Administration
Rodney Whitfield, Director of Financial Services, Federal Highway Administration
Veneshia Smith, Financial Manager, Financial Services, Federal Highway Administration
Marsue Morrill, Chief, External Audits, Independent office of Audits and Investigations
Chris Schmidt, Chief, Division of Transportation Planning, Caltrans
Tom Balkow, Deputy Director, Planning and Local Assistance, District 2, Caltrans
Kathy Grah, Senior Transportation Planner, Planning and Local Assistance, District 2, Caltrans



November 15, 2018

Chris Schmidt
Chief
Division of Transportation Planning
PO Box 942874
Sacramento, CA 94274

and

Rihui Zhang
Chief
Division of Local Assistance

Dear Messrs. Schmidt and Zhang:

SRTA submitted the Corrective Action Plan for the Indirect Cost Allocation Plan (ICAP) Audit for Fiscal Year (FY) 2014-15 to the California Department of Transportation (Caltrans) on July 31, 2018 and received a response from Caltrans on November 14, 2018. In response to the Caltrans Division of Transportation Planning (DOTP) and Division of Local Assistance (DLA) inquiries, please see the below:

Finding #1 -Improper Procurement Practices

Caltrans Audits and Investigations (A&I) recommended that SRTA ensure compliance with Caltrans' agreements and State and federal regulations regarding proper procurement procedures and documentation. In addition, Caltrans A&I recommended SRTA revise their purchasing policies and procedures, and train staff accordingly, to ensure compliance with State and federal regulations, and Caltrans Local Assistance Procedures Manual (LAPM), as well as SRTA's procurement policy. SRTA stated they have included the following in their Policies and Procedures updated in September 2016:

- Ensuring a request for proposal (RFP) is utilized when required per state and federal regulations.
- Documenting the basis for consultant selection.

- Including the evaluation criteria (i.e. cost proposal and/or interviews) in the RFP and ensuring the score sheets match the RFP.
- Ensuring the evaluation criteria specifies the weighted values and these values match the evaluation criteria listed on the RFP.
- Performing an independent cost estimate or cost analysis consistent with the method of procurement.
- Ensuring the RFP includes a full and detailed scope of work and associated budget.
- Ensuring the correct type of contract (i.e. project-specific or on-call) and appropriate use.

We were not able to locate the following references in the 2016 update. Cal trans requests page numbers and sections for the following:

- Ensuring a RFP is utilized when required per state and federal regulations.
- Performing an independent cost estimate or cost analysis consistent with the method of procurement.
- Ensuring the correct type of contract (i.e. project-specific or on-call) and appropriate use.

We acknowledge that SRTA will include the following in the December 2018 update:

- Ensuring profit is negotiated as a separate element of price.

SRTA has coordinated with DOTP to submit a plan to overmatch a total of \$212,049 using non-federal/State fund sources in the Overall Work Program (OWP) due to procurement deficiencies.

Response:

SRTA's September 2016 Procurement Policies and Procedures address the above findings per each of the residual bullets. Please note that ensuring whether a project-specific or on-call contract is appropriate represents a combination of procurement sections. For example, Section 235.040 J. below indicates what type of uses constitute an on-call contract. For those uses, a Request for Qualifications is issued; thus, the reference to Section 235.040 J.

- Section 2.35.040 H., pages 90-92: Ensuring an RFP is utilized when required per state and federal regulations.
- Section 2.35.020 L.1. and 2., page 79: Performing an independent cost estimate or cost analysis consistent with the method of procurement.
- Section 235.040 J., page 99: Ensuring the correct type of contract (i.e. project-specific or on-call) and appropriate use.

Finding #2 -Inadequate Contract Management

Caltrans A&I recommended that SRTA revise their policies and procedures and ensure staff are trained and follow the procedures, to ensure compliance with state and federal requirements over the administration of consultant contracts. SRTA stated they have included the following in their Policies and Procedures updated in September 2016:

- Execution, administration, and approvals of contract and amendments.
- Proper scope development.
- Required contract language and provisions.
- The correct methods of payment and appropriate use.
- Specify and verify cost data and elements; including loaded labor rates, before entering into contracts.
- Billing of eligible and allowable costs in accordance with contracts/cost proposals and agreements.
- Sub-recipients, contractors and subcontractors invoicing requirements, that include identifying tasks per the cost proposal and contract work elements and tasks numbers.
- Unique contract numbers.

We were not able to locate the following references in the 2016 update. Caltrans requests page numbers and sections for the following:

- Required contract language and provisions.
- The correct methods of payment and appropriate use.
- Billing of eligible and allowable costs in accordance with contracts/cost proposals and agreements.
- Sub-recipients, contractors and subcontractors invoicing requirements, that include identifying tasks per the cost proposal and contract work elements and tasks numbers,
- Unique contract numbers.

We acknowledge that SRTA will include prohibition of contingencies in the December 2018 update, but please desist from accepting proposals with contingencies in current cost proposals.

SRTA will also provide documentation to show that staff has been trained on the revisions to their policies and procedures.

Response:

- SRTA found that it was more appropriate to address the contract language and provisions in our Technical Services Agreement (TSA) template which incorporates requisite contract language and provisions. This TSA template is appended to procurements issued.

- Correct methods of payment and appropriate use are outlined in the General Procurement (Section 2.35.20) of SRTA's policy manual or "Big Book" (available here: <https://www.srta.ca.gov/DocumentCenter/View/3791/SRTA-Big-Book-FINAL-ALL-POLICIES-011718?bidId>).
- SRTA has addressed billing of eligible and allowable costs in accordance with contracts/cost proposals and agreements in our TSA Template (Section 3 and Attachment B) in the TSAs executed with contractors.
- SRTA has addressed invoicing requirements, including identifying tasks per the cost proposal and contract work elements and tasks numbers in the SRTA TSA Template Attachment B.
- SRTA has addressed unique contract numbers. Unique contract numbers are included on the SRTA Technical Services Agreement (TSA) template and recorded on the continually-updated SRTA TSA tracking spreadsheet.

Finding #3 - Regional Surface Transportation Program Not Adequately Administered

Caltrans recommended that SRTA must establish written agreements with Regional Surface Transportation Program (RSTP) Exchange fund recipients to ensure compliance with the RSTP Exchange fund requirements, conditions, and specifications; and provide evidence to substantiate fund recipient project costs as authorized under Section 2 in Article XIX of the California Constitution (CC). SRTA was to provide RSTP Exchange policies and procedures for DLA review.

In their response on July 31, 2018, SRTA stated they would revise their policies in Chapter 18 of the LAPM [sic] once this section is updated since A&I and Caltrans Local Assistance does not agree on the applicability of certain federal project eligibility requirements on exchanged funds. In January 2018, Chapter 18 of the Local Assistance Program Guidelines (LAPG) was updated and removed all reference to the code of federal regulations. Chapter 18 of the LAPG now only references the Streets & Highways Code and the CC.

Caltrans requests for SRTA to continue with their corrective action plan to update their RSTP Exchange procedures and refer to Chapter 18 of the LAPG for guidance.

Response:

In April 2018, the SRTA Board of Directors revised its RSTP policies and procedures for consistency with Chapter 18 of the LAPG and approved using a Sub-Recipient Cooperative Agreement (SCA) for RSTP Exchange Projects selected and awarded by the SRTA Board of Directors. The draft RSTP policies and procedures were provided to Caltrans HQ Local Assistance for input prior to the board of directors meeting. In June 2018, the SRTA Board of Directors awarded projects for FY 2016-17 and FY 2017-18 RSTP Exchange Funds. RSTP SCAs for these funds were subsequently executed between SRTA and each of the local jurisdictions for

their funding share and selected projects. Per the LAPG, jurisdictional expenditures will not be reimbursed in arrears.

Finding #4 - Costs Billed Were not in Agreement with the Planning Programming and Monitoring Agreement

Caltrans recommended that SRTA must develop and implement Planning Programming and Monitoring (PPM) fund policies and procedures, ensure future subconsultants would substantiate project costs in compliance with the PPM agreement and comply with Caltrans' PPM agreement. Caltrans also required that billings submitted to Caltrans were consistent with the OWP and in accordance to PPM fund policies and procedures.

In their response on July 31, 2018, SRTA stated they have developed an internal policy to address the recommendations provided by Caltrans. In addition, SRTA will implement a PPM plan to the Fund Transfer Agreement prior to June 30, 2019.

Caltrans requests a copy of the internal PPM policy and the PPM plan prior to creating the Fund Transfer Agreements in 2019. Specifically, the internal PPM policy and plan must comply with California Transportation Commission guidelines and the DLA's PPM agreement.

Response:

- SRTA prepared and submitted a PPM Plan and allocation request for FY 2018/19 PPM funds. That request was submitted to Caltrans D2 on November 8, 2018.
- SRTA prepared Section 2.40.030 – Entering Into and Managing Agreements with Sub-Recipients of Federal (State) Grant Funds (pages 134-138 of SRTA's "Big Book" of policies; available online at: <https://www.srta.ca.gov/DocumentCenter/View/3791/SRTA-Big-Book-FINAL-ALL-POLICIES-011718?bidId=>). This section addresses not just PPM funds passed through to subconsultants, but all funds passed through to subconsultants.

Finding #5 - Unallowable Indirect Costs Billed to Caltrans

Caltrans recommended that SRTA must reimburse \$31,098 in disallowed indirect costs.

In their response on July 31, 2018, SRTA stated they will develop and implement PPM fund policies and use overmatch from previous years to offset the \$31,098 in disallowed costs.

In Caltrans' March 27, 2018 letter to SRTA, Caltrans required reimbursement of the \$31,098 in disallowed indirect costs for work charged to the Department of Conservation. Disallowed indirect costs are not eligible to be overmatched and were reimbursed to SRTA in good faith as costs billed for performance on Caltrans projects.

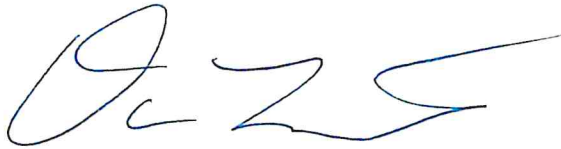
As stated in Caltrans' March 27, 2018 letter, the DLA will coordinate with SRTA on repayment.

Response:

SRTA has coordinated repayment with DLA.

If you have any questions, please contact Monika Long, Chief Financial Officer at SRTA, at (530) 262-6193.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Little', with a long horizontal flourish extending to the right.

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

DEPARTMENT OF TRANSPORTATION

DIVISION OF TRANSPORTATION PLANNING

P.O. BOX 942874, MS-32

SACRAMENTO, CA 94274

PHONE (916) 653-1637

FAX (916) 653-0001

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life.*

November 14, 2018

Ms. Monika Long, CPA
Chief Financial Officer
Shasta Regional Transportation Agency
1255 East Street, Suite 202
Redding, CA 96001

Dear Ms. Long:

This letter is in regard to the Shasta Regional Transportation Agency (SRTA) Corrective Action Plan for the Indirect Cost Allocation Plan (ICAP) Audit for Fiscal Year (FY) 2014-15. SRTA submitted the Corrective Action Plan to the California Department of Transportation (Caltrans) on July 31, 2018. In response to SRTA's submittal, the Caltrans Division of Transportation Planning (DOTP) and Division of Local Assistance (DLA) have reviewed the corrective action plan and request responses to outstanding items below:

Finding #1 – Improper Procurement Practices

Caltrans Audits and Investigations (A&I) recommended that SRTA ensure compliance with Caltrans' agreements and State and federal regulations regarding proper procurement procedures and documentation. In addition, Caltrans A&I recommended SRTA revise their purchasing policies and procedures, and train staff accordingly, to ensure compliance with State and federal regulations, and Caltrans Local Assistance Procedures Manual (LAPM), as well as SRTA's procurement policy. SRTA stated they have included the following in their Policies and Procedures updated in September 2016:

- Ensuring a request for proposal (RFP) is utilized when required per state and federal regulations.
- Documenting the basis for consultant selection.
- Including the evaluation criteria (i.e. cost proposal and/or interviews) in the RFP and ensuring the score sheets match the RFP.
- Ensuring the evaluation criteria specifies the weighted values and these values match the evaluation criteria listed on the RFP.
- Performing an independent cost estimate or cost analysis consistent with the method of procurement.
- Ensuring the RFP includes a full and detailed scope of work and associated budget.

- Ensuring the correct type of contract (i.e. project-specific or on-call) and appropriate use.

We were not able to locate the following references in the 2016 update. Caltrans requests page numbers and sections for the following:

- Ensuring a RFP is utilized when required per state and federal regulations.
- Performing an independent cost estimate or cost analysis consistent with the method of procurement.
- Ensuring the correct type of contract (i.e. project-specific or on-call) and appropriate use.

We acknowledge that SRTA will include the following in the December 2018 update:

- Ensuring profit is negotiated as a separate element of price.

SRTA has coordinated with DOTP to submit a plan to overmatch a total of \$212,049 using non-federal/State fund sources in the Overall Work Program (OWP) due to procurement deficiencies.

Finding #2 – Inadequate Contract Management

Caltrans A&I recommended that SRTA revise their policies and procedures and ensure staff are trained and follow the procedures, to ensure compliance with state and federal requirements over the administration of consultant contracts. SRTA stated they have included the following in their Policies and Procedures updated in September 2016:

- Execution, administration, and approvals of contract and amendments.
- Proper scope development.
- Required contract language and provisions.
- The correct methods of payment and appropriate use.
- Specify and verify cost data and elements; including loaded labor rates, before entering into contracts.
- Billing of eligible and allowable costs in accordance with contracts/cost proposals and agreements.
- Sub-recipients, contractors and subcontractors invoicing requirements, that include identifying tasks per the cost proposal and contract work elements and tasks numbers.
- Unique contract numbers.

We were not able to locate the following references in the 2016 update. Caltrans requests page numbers and sections for the following:

- Required contract language and provisions.
- The correct methods of payment and appropriate use.
- Billing of eligible and allowable costs in accordance with contracts/cost proposals and agreements.
- Sub-recipients, contractors and subcontractors invoicing requirements, that include identifying tasks per the cost proposal and contract work elements and tasks numbers.
- Unique contract numbers.

We acknowledge that SRTA will include prohibition of contingencies in the December 2018 update, but please desist from accepting proposals with contingencies in current cost proposals.

SRTA will also provide documentation to show that staff has been trained on the revisions to their policies and procedures.

Finding #3 – Regional Surface Transportation Program Not Adequately Administered

Caltrans recommended that SRTA must establish written agreements with Regional Surface Transportation Program (RSTP) Exchange fund recipients to ensure compliance with the RSTP Exchange fund requirements, conditions, and specifications; and provide evidence to substantiate fund recipient project costs as authorized under Section 2 in Article XIX of the California Constitution (CC). SRTA was to provide RSTP Exchange policies and procedures for DLA review.

In their response on July 31, 2018, SRTA stated they would revise their policies in Chapter 18 of the LAPM [sic] once this section is updated since A&I and Caltrans Local Assistance does not agree on the applicability of certain federal project eligibility requirements on exchanged funds. In January 2018, Chapter 18 of the Local Assistance Program Guidelines (LAPG) was updated and removed all reference to the code of federal regulations. Chapter 18 of the LAPG now only references the Streets & Highways Code and the CC.

Caltrans requests for SRTA to continue with their corrective action plan to update their RSTP Exchange procedures and refer to Chapter 18 of the LAPG for guidance.

Finding #4 – Costs Billed Were not in Agreement with the Planning Programming and Monitoring Agreement

Caltrans recommended that SRTA must develop and implement Planning Programming and Monitoring (PPM) fund policies and procedures, ensure future subconsultants would substantiate project costs in compliance with the PPM agreement and comply with Caltrans' PPM agreement. Caltrans also required that billings submitted to Caltrans were consistent with the OWP and in accordance to PPM fund policies and procedures.

In their response on July 31, 2018, SRTA stated they have developed an internal policy to address the recommendations provided by Caltrans. In addition, SRTA will implement a PPM plan to the Fund Transfer Agreement prior to June 30, 2019.

Caltrans requests a copy of the internal PPM policy and the PPM plan prior to creating the Fund Transfer Agreements in 2019. Specifically, the internal PPM policy and plan must comply with California Transportation Commission guidelines and the DLA's PPM agreement.

Finding #5 – Unallowable Indirect Costs Billed to Caltrans

Caltrans recommended that SRTA must reimburse \$31,098 in disallowed indirect costs.

In their response on July 31, 2018, SRTA stated they will develop and implement PPM fund policies and use overmatch from previous years to offset the \$31,098 in disallowed costs.

In Caltrans' March 27, 2018 letter to SRTA, Caltrans required reimbursement of the \$31,098 in disallowed indirect costs for work charged to the Department of Conservation. Disallowed indirect costs are not eligible to be overmatched and were reimbursed to SRTA in good faith as costs billed for performance on Caltrans projects.

As stated in Caltrans' March 27, 2018 letter, the DLA will coordinate with SRTA on repayment.

Conclusion:

A response to address all the questions and comments outlined in this letter must be forwarded to Caltrans within 60 days. Failure by SRTA to submit the additional follow up to Caltrans within 60 days will result in Caltrans not approving SRTA's FY 2019-20 OWP and may increase the potential liability for future disallowed costs. No future federal and state expenditures will be approved by Caltrans, Federal Highway Administration (FHWA), or Federal Transit Administration (FTA) unless a satisfactory plan to address all findings have been made. A final report detailing how and when all corrective actions were resolved will be due to Caltrans upon

Ms. Monika Long
November 14, 2018
Page 5

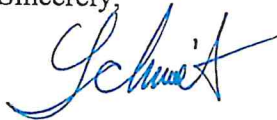
the satisfactory fulfillment of all corrective actions. Caltrans has consulted with FHWA and FTA regarding the above course of action.

Caltrans A&I may perform a follow-up audit after all corrective actions have been made to determine if SRTA has implemented the adequate corrective measure for the audit finding and to ensure compliance with Caltrans agreements and federal and state rules and regulations. SRTA's progress with regards to the corrective actions and final resolutions will be closely monitored by Caltrans staff, including any follow-up audit work that may be performed. Additionally, all

support documentation and corrective actions provided by SRTA will be reviewed by Caltrans staff.

We appreciate SRTA's cooperation and coordination during this process. If you have any questions, please contact Jacqueline Kahrs, in DOTP, at (916) 653-9255 or Daniel Burke, in DLA, at (916) 654-5854.

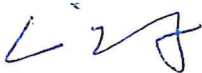
Sincerely,



CHRIS SCHMIDT

Chief

Division of Transportation Planning



RIHUI ZHANG

Chief

Division of Local Assistance

cc: Tashia Clemons, Director of Program Development, FHWA
Rodney Whitfield, Director of Financial Services, FHWA
Veneshia Smith, Financial Manager, Financial Services, FHWA
Marilee Mortenson, Acting Chief, Office of Regional Planning, DOTP, Caltrans
Jacqueline Kahrs, Senior Transportation Planner, DOTP, Caltrans
Tom Balkow, Deputy Director, Planning and Local Assistance, District 2, Caltrans
Ian Howat, District Local Assistance Engineer, DLA, District 2, Caltrans
Kathy Grah, Senior Transportation Planner, Planning and Local Assistance, District 2
Kamal Sah, Chief, Office of Guidance and Oversight, DLA, Caltrans
Daniel Burke, Civil Rights Program Manager, Program Review and Outreach, Office of Guidance and Oversight, DLA, Caltrans

**Transit and Intercity Rail Capital Program (TIRCP)
Project Reporting Request**

Section 1. Project Information

Please identify the project being reported.

1. Award Year:

2018

2. Award Recipient:

Shasta Regional Transportation Agency

3. Project Name

North State Intercity Electric Bus System

4. Separable Award Component:

1. I-5 Backbone
2. North Valley Feeder

PREPARED BY (Name and Title): JENNIFER POLLOM, SENIOR TRANSPORTATION PLANNER	PHONE: 530-339-6155	EMAIL: JPOLLOM@SRТА.CA.GOV
PREPARED BY (Signature): 	DATE REPORT WAS PREPARED: 11/29/2018	

Section 2. Estimated Co-Benefits at The Time of Project Award

Please identify the following estimated co-benefits at the time of award for Projects that received their first allocation between June 1, 2018 and October 30, 2018.

1. Project Address:

Interstate 5 (I-5) corridor between Redding and Sacramento, supplemented by electric feeder bus connections from Tehama, Glenn, Colusa and Butte counties.

2. Project Location - Latitude and Longitude (degrees):

Please provide key markers such as the start and end points of corridor(s), location of facilities, and at least one point associated with AB 1550 communities if benefits to AB 1550 priority populations is applicable.

Interstate 5 (I-5) corridor starting transit stop location is in an AB 1550 community – Latitude 40°34'58.77"N and Longitude 122°23'31.94"W

Interstate 5 (I-5) corridor ending transit stop location – Latitude 38°34'59.47"N and Longitude 121°29'58.70"W

3. Identify which of the Governor's Pillars this Project Contributes to (1,2,3,4,5,6):

<https://www.arb.ca.gov/cc/pillars/pillars.htm>

- ☒ 1. 50% Renewable Electricity
- ☒ 2. 50% Reduction in Petroleum Use in Vehicles
- ☐ 3. Double Energy Efficiency Savings at Existing Buildings
- ☐ 4. Carbon Sequestration in the Land Base (Natural and Working Lands)
- ☐ 5. Reduce Short-Lived Climate Pollutants
- ☐ 6. Safeguard California

4. Identify and Describe Other State Policies, Plans, or Initiatives the Project Aligns with:

The project aligns with the 2018 CA State Rail Plan as the 2022 plan for proposed passenger improvements and investments, there is a stated short-term goal to expand integrated bus service to Redding.

TIRCP Project Reporting Request

Page 3 of 9

5. Identify if the Project supports the Climate Change Scoping Plan:

<https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>

☒ Yes

☐ No

6. Identify and Describe Project Benefits that Support the Climate Change Scoping Plan:

<https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>

The use of battery electric buses and development of solar energy to offset the energy needs of the vehicles.

7. Identify the Project Completion Date and Initial Start Date of Service and/or Operations for Each Separable Award Component:

Project completion is estimated for June 2021. Initial start date for operation of the I-5 Backbone and North Valley Feeder is January 2020.

8. Confirm if the Project has Been Awarded Other Green House Reduction Funds (GGRF):

☐ Yes

☒ No

If Yes, Identify the GGRF Fund Sources:

9. Confirm if the Schedule or Funding Plan have Changed:

Schedule Change Since Allocation Request:

☐ Yes (Attach Updated Project Programming Request)

☒ No

Funding Plan Change Since Allocation Request:

☐ Yes (Attach Updated Project Programming Request)

☒ No

Section 3. Benefits at Project Completion

Complete this section if the entire Project award is considered closed out. Reported benefits should be from June 1, 2018 through October 30, 2018 unless benefits were accrued prior to June 1, 2018 and not yet reported. At a minimum, all benefits identified in the benefits tool at the time of project application apply.

1. Diesel PM Reductions (lbs)

2. NOx Reductions (lbs)

3. PM 2.5 Reductions (lbs)

4. Reactive Organic Gases Reductions (lbs)

5. Passenger VMT Reductions (miles)

6. Fossil Fuel Based Transportation Fuel Use Reductions (gallons)

7. Fossil Fuel Based Energy Use Reductions (kwh)

8. Renewable Energy Generation (kWh)

Section 4. Ongoing Outcome Reporting

Complete this section if at least one component is implemented and accruing benefits. Reported benefits should be from June 1, 2018 through October 30, 2018 unless benefits were accrued prior to June 1, 2018 and not yet reported. At a minimum, all benefits identified in the benefits tool at the time of project application apply.

1. Co-benefits achieved (enter totals and include qualitative descriptions for this reporting period where applicable):

a. Date Operational (by separable component):

--

b. Days of Operation per Year (days/year):

--

c. Average Daily Ridership (unlinked trips per day)

Number of riders per day using the number of unlinked trips per day, based on ridership survey, ticket and transit pass sales, automatic passenger counter, driver counts, etc.

--

d. Ridership Increases (unlinked trips per day):

--

e. Annual Passenger VMT (VMT/Year):

Vehicle miles traveled per year, based on evaluation of fueling, utility, mileage, or other operating records.

--

f. Annual Passenger VMT Reductions (VMT/Year):

--

g. Gasoline Use (gallons/year):

Gallons of gasoline used in gallons per year, based on evaluation of fueling, utility, mileage, or other operating records.

--

h. Change in Gasoline Use (gallons/year):

Change in gasoline used in gallons per year, based on evaluation of fueling, utility, mileage, or other operating records.

--

i. Diesel Use (gallons/year)

Gallons of diesel used in gallons per year, based on evaluation of fueling, utility, mileage, or other operating records.

--

j. Change in Diesel Use (gallons/year):

Change in diesel used in gallons per year, based on evaluation of fueling, utility, mileage, or other operating records.

--

k. Energy Use (kWh/year):

Energy used in kWh per year, based on evaluation of fueling, utility, mileage, or other operating records.

--

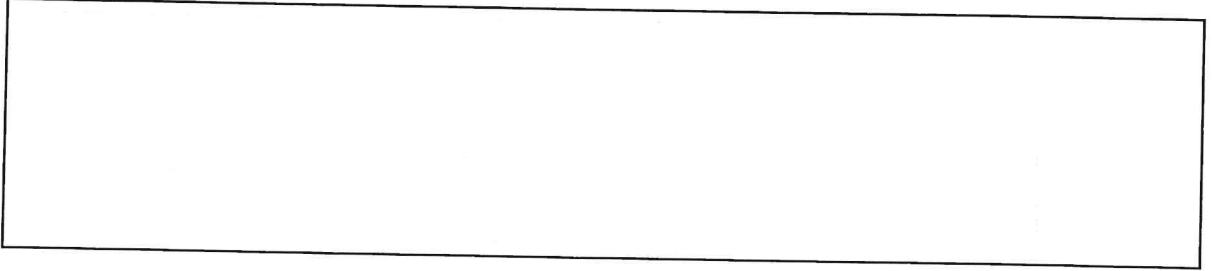
l. Change in Energy Use (scf/year)

Change in energy used in scf per year, based on evaluation of fueling, utility, mileage, or other operating records.

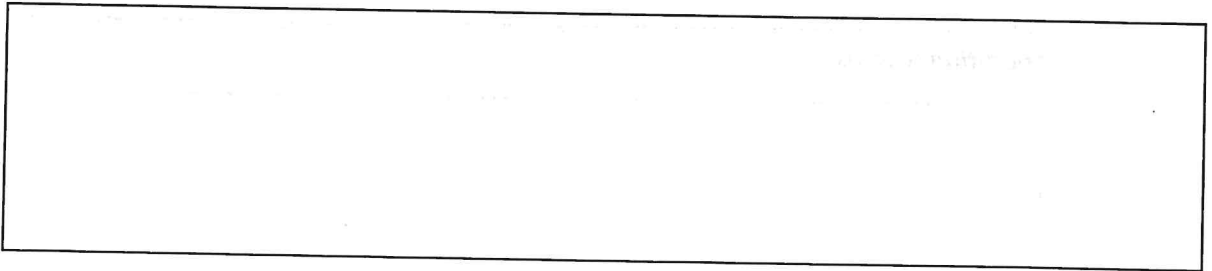
--

2. Additional Co-Benefits Achieved

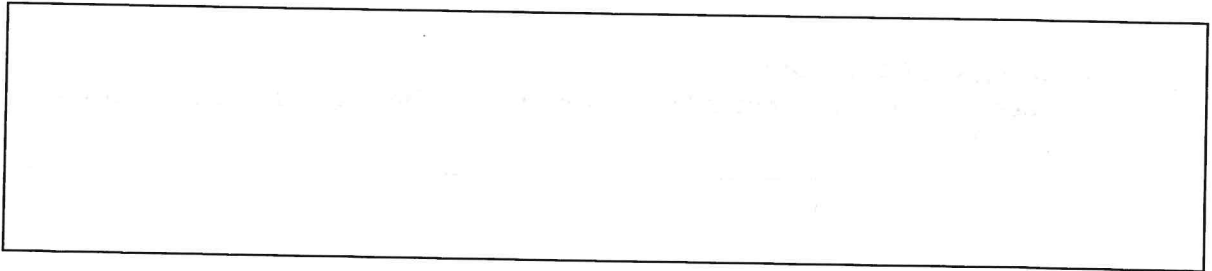
a. AB 1550 Priority Population Benefits:

A large, empty rectangular box with a black border, intended for text input.

b. Describe Network Integration Benefits Achieved:

A large, empty rectangular box with a black border, intended for text input.

c. Describe Other Project Benefits Achieved (Quantitative and/or Qualitative):

A large, empty rectangular box with a black border, intended for text input.

GENERAL RESOURCES

CARB Funding Guidelines:

<https://ww2.arb.ca.gov/resources/documents/cci-funding-guidelines-administering-agencies>

CARB Quantification Methodologies:

<https://ww2.arb.ca.gov/resources/documents/cci-quantification-benefits-and-reporting-materials>

TIRCP Guidelines:

<http://www.dot.ca.gov/drm/sptircp.html>



1255 East Street, Suite 202 • Redding, CA 96001 • (530) 262-6190 • Fax: (530) 262-6189
E-mail: srta@srta.ca.gov • Website: www.srta.ca.gov

Daniel S. Little, Executive Director

December 18, 2018

Priscilla Martinez-Velez
Senior Transportation Planner
Sustainable Transportation Planning Grants
California Department of Transportation
Division of Transportation Planning
Office of Regional Planning
1120 N Street, MS 32
Sacramento, CA 95814

SUBJECT: Amendment to the ShastaReady Extreme Climate Event Mobility and Adaptation Plan

Dear Ms. Martinez-Velez:

The Shasta Regional Transportation Agency (SRTA) is pleased to amend our grant application for the ShastaReady Extreme Climate Event Mobility and Adaptation Plan to include the augmented budget and scope of work for ButteReady. SRTA has a long and productive history of collaborating with the Butte County Association of Governments (BCAG) and now, with the shared experience of two devastating fires in the same year, we plan to conduct joint efforts where it makes sense to do so while continuing to recognize the challenges and stakeholders unique to each region.

Thank you for your consideration of adding BCAG at this time; it would not have been otherwise possible with the grant deadline immediately following the Camp Fire. We hope Caltrans can find resources to fund both regional components of the project. If not, we ask that ButteReady be viewed as a severable component. If this were to happen, SRTA would still include BCAG in the ShastaReady process in hopes that the lessons learned can be integrated into a subsequent ButteReady process, if funded.

We are confident that both of these efforts will have widespread applicability in other regions throughout the state.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel S. Little", is written over a horizontal line.

Daniel S. Little, AICP, Executive Director

dsl/acl



North State Super Region

1255 East Street, Suite 202, Redding, CA 96001

(530) 262-6190 nssr16@gmail.com

www.superregion.org

Ivan Garcia, Chair

Jon Clark

Butte County Assn. of Governments

Scott Lanphier

Colusa County Transportation Comm.

Tamera Leighton

Del Norte Local Transportation Comm.

Di Aulabaugh

Glenn County Transportation Comm.

Marcella Clem

Humboldt County Association of Govt.

Lisa Davey-Bates

Lake Co City/Area Planning Comm.

Richard Egan

Lassen County Transportation Comm.

Phil Dow

Mendocino County Council of Governments

Debbie Pedersen

Modoc County Transportation Comm.

Daniel Landon

Nevada County Transportation Comm.

Robert Perreault

Plumas County Transportation Comm.

Daniel S. Little

Shasta Regional Transportation Agency

Tim Beals

Sierra County Transportation Comm.

Melissa Cummins

Siskiyou County Local Trans. Comm.

Gary Antone

Tehama County Transportation Comm.

Richard Tippet

Trinity County Transportation Comm.

December 18, 2018

Priscilla Martinez-Velez

Senior Transportation Planner

Grant Management

Office of Regional Planning

1120 N Street, MS-32

Sacramento, CA 95814

Subject: Adaptation Planning Grant Submittal - ShastaReady Extreme Climate Event Mobility and Adaption Plan

Dear Mr. Martinez-Velez,

The North State Super Region (NSSR), a coalition of sixteen counties in Northern California writes to support the grant funding efforts submitted by the Shasta Regional Transportation Agency for the "ShastaReady Extreme Climate Event Mobility and Adaptation Plan".

Please accept this letter of support from the NSSR for Shasta's original grant submittal foremost, and if able to, BCAG's supplemental grant request to accomplish the same work products as identified in the grant.

Recent climate-related events such as the Shasta wildfires, Butte County wildfires and the 2017 Oroville Dam crisis have significantly underscored vulnerabilities in the north state. If there was ever a need for adaptation planning moving forward, the time is now. The successful delivery of this work effort will provide us with the tools, processes and identification of potential project for inclusion in our respective Regional Transportation Plan/Sustainable Communities Strategies.

Again, thank you for the consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Ivan Garcia".

Ivan Garcia, Chair
North State Super Region



326 Huss Drive, Suite 150
Chico, California 95928-8441
(530) 809-4616 FAX (530) 879-2444
www.bcag.org

December 17, 2018

Priscilla Martinez-Velez
Senior Transportation Planner
Grant Management
Office of Regional Planning
1120 N Street, MS-32
Sacramento, CA 95814

Dear Ms. Martinez-Velez,

The purpose of this correspondence is to respectfully request Caltrans accept and consider this revision to the ShastaReady Extreme Climate Event Mobility and Adaption Plan submitted by the Shasta Regional Transportation Planning Agency. Shasta TPA has graciously accepted modifying their grant submittal to allow for an increase in scope and budget to achieve the same deliverables as proposed by the Butte County Association of Governments.

As you are aware of the devastating fires which began on November 8, 2018 in and near Paradise, our region is still in shock with the magnitude of impacts not only in Paradise, but the surrounding region as well. We appreciate the state's willingness to accept this grant modification at a time when we really need "planning" now as the town and region moves forward in its rebuilding efforts. The total acres burned were 153,336 with 13,972 residences, 528 commercial buildings and 4,293 other buildings destroyed. Words cannot categorize the destruction we are facing. In addition, in 2017 we faced flooding concerns with the Oroville Dam, also in Butte County. Our environment is changing and we as a region in the north state, including Shasta are requesting the funds to help us better prepare and plan for the future.

Due to these circumstances we have an opportunity to accomplish some good planning work. We have an opportunity to gather the immense data and experiences as well as other climate change potential impacts and identify some potential solutions in the effort to minimize loss of life and improve the communications and processes for all of the agencies involved. The work effort from this project would be incorporated into BCAG's Regional Transportation Plan / Sustainable Communities Strategy.

BCAG has prepared the same project timeline submitted by Shasta TPA. Butte and Shasta counties are similar in population and land area size. We believe the magnitude of supplemental work effort will mirror Shasta County. This will also facilitate the management of

Ms. Priscilla Martinez-Velez
December 18, 2018
Page 2

the consultant contract should it be awarded. As such, BCAG is requesting \$289,850 in grant funds with \$48,700 in local match for a supplement request of \$341,000.

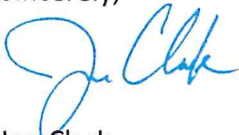
In addition, BCAG would want to ensure that in no way this supplemental request would jeopardize Shasta's original grant award. First and foremost is Shasta Transportation Planning Agency's original grant submittal.

Should the grant funds be approved, BCAG and Shasta would revise the Scope of Work and Project Timeline to include both regions and or other changes as requested by the State.

If you have any questions, please give Ivan Garcia of my staff a call directly at 530-809-4603 or by email at igarcia@bcag.org.

Thank you again for the grant funding consideration.

Sincerely,



Jon Clark
Executive Director

Attachments:

- Revised Cover Letter from Shasta County Regional Transportation Planning Agency
- Supplemental Project Timeline
- North State Super Region Letter of Support



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

December 20, 2018

Mr. Muhaned Aljibiry
Department of Transportation
Division of Transportation Programming, MS 82
P.O. Box 942874
Sacramento, CA 94274-0001

Attention: Abhijit Bagde, SRTA FTIP Liaison

Subject: Administrative Modification No. 2 to the Shasta 2019 Federal Transportation Improvement Program (FTIP)

Dear Mr. Aljibiry:

With the delegated authority provided on January 9, 2012, by Caltrans to the Shasta Regional Transportation Agency (SRTA) to approve administrative modifications to the Federal Transportation Improvement Program (FTIP), I hereby approve Administrative Modification No. 2 to the Shasta 2019 FTIP. The modification is consistent with metropolitan transportation planning regulations per Title 23 Code of Federal Regulations Part 450. As modified, the 2017 FTIP is financially constrained. Additionally, the modification is consistent with the Regional Transportation Plan. Shasta County is in conformance with federal air quality standards.

Enclosed for your convenience are the: authorizing resolution; summary of changes for this administrative modification; CTIPS programming pages of the "modified" and "prior" versions; and the grouped project listing.

In summary, the administrative modification makes one grouped project listing revision, as follows:

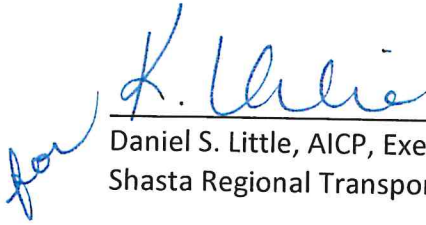
- **Grouped Projects for Safety Improvements, Shoulder Improvements, Pavement Resurfacing and/or Rehabilitation – Minor Program (CTIPS ID No. 211-000-0108)** – In Shasta County, increases cost to I-5 project (#3H610) 9 miles north of Pollard Flat at various locations by \$78,000 in FY2019/20. Also in Shasta County, adds State Route 36 project (#2H620) near Platina and Harrison Gulch Bridge—construct fish passage—\$417,000 for FY2020/21.

An electronic copy will be transmitted by email to you, and the below contact list.

If you have any questions, please contact either:

- Senior Transportation Planner, Keith Williams (530) 262-6192 or kwilliams@srta.ca.gov
- Senior Transportation Planner, Kathy Urlie at (530) 262-6194, or kurlie@srta.ca.gov.

Sincerely,

for

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

DSL/KKU/al

Enclosures: SRTA Resolution 11-15
Summary of Changes Spreadsheet
CTIPS Programming Pages (Modified and Prior)
Grouped Project Listing for CTIPS 211-0000-0108

C: Scott Carson – FHWA, CA Division
Jerome Wiggins – FTA, Region 9
Wendy Lonnberg – Caltrans, District 2

RESOLUTION



RESOLUTION NUMBER:	11-15
SUBJECT:	Delegation of the Federal Transportation Improvement Program (FTIP) Administrative Modification Procedures

WHEREAS, the Shasta County Regional Transportation Planning Agency (SCRTPA) has been designated as the Metropolitan Planning Organization (MPO) for Shasta County; and

WHEREAS, Title 23 Code of Federal Regulations, Part 450 requires the preparation and adoption of a Federal Transportation Improvement Program (FTIP) by the MPO to become part of the Federal-Statewide Transportation Improvement Program (FSTIP); and

WHEREAS, the SCRTPA is responsible for preparing and processing administrative modifications and amendments to the FTIP; and

WHEREAS, the Federal Highway Administration and Federal Transit Administration, in consultation with the California Department of Transportation (Caltrans), has provided revised procedures for administrative modifications to the FSTIP to the governing board and subsequently the executive director of the SCRTPA (or designee); and

WHEREAS, the SCRTPA board identifies that it is appropriate, in addition to all former authorizing delegations, for approval of future FSTIP administrative modification actions to be delegated to the executive director of the SCRTPA (or designee).

NOW, THEREFORE, BE IT RESOLVED that the Shasta County Regional Transportation Planning Agency:

1. Accepts delegation authority from Caltrans to approve administrative modifications to the FSTIP in accordance with the attached FSTIP/FTIP Administrative Modifications and Amendments Procedures; and
2. Authorizes the executive director to approve administrative modifications to the FSTIP on behalf of the board.

PASSED AND ADOPTED this 25th day of October 2011, by the Shasta County Regional Transportation Planning Agency.

A handwritten signature in black ink, appearing to read "Leonard Moty". The signature is written over a horizontal line.

Leonard Moty, Chair
Shasta County Regional Transportation Planning Agency

Shasta 2019 FTIP Summary of Changes

Shasta Regional Transportation Agency (SRTA) Administrative Modification No. 2

Existing / New	CTIPS ID	PROJECT TITLE	DESCRIPTION OF CHANGE	Phase	PRIOR CTIPS Amt.	CURRENT CTIPS Amt.	FFY	Financial Table Fund Source	Net Increase/Decrease	Total Project Cost Change	%	Comments
Existing	211-0000-0108	Grouped Projects for Safety Improvements, Shoulder Improvements, Pavement Resurfacing and/or Rehabilitation - Minor Program	Increases cost for project #3H610 and adds project #2H620	CON	\$ 1,336,000	\$ 1,414,000	2019/20	Minor	\$ 78,000	\$ 495,000	37%	Programming does not exceed formal amend threshold for all 4 active years
					\$ -	\$ 417,000	2020/21	Minor	\$ 417,000			

Sum of Net Row Labels				Column Labels			
		2019/20	2020/21			2019/20	2020/21
Minor	\$	78,000	\$	417,000	\$	495,000	
Grand Total	\$	78,000	\$	417,000	\$	495,000	

**Shasta County RTPA - Federal Transportation Improvement Program
(Dollars in Whole)
State Highway System**

DIST: 02	PPNO: EA: 02-4E270	CTIPS ID: 211-0000-0108	TITLE (DESCRIPTION): Grouped Projects for Safety Improvements, Shoulder Improvements, Pavement Resurfacing (and/or rehabilitation - Minor Program Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 and Table 3 categories - Railroad/highway crossing, safer non-Federal-aid system roads, shoulder improvements, traffic control devices and operating assistance other than signalization projects, intersection signalization projects at individual intersections, pavement marking demonstration, truck climbing lanes outside the urbanized area, lighting improvements, emergency truck pullovers, etc.)	MPO Aprv: 12/20/2018 State Aprv: Federal Aprv: EPA TABLE II or III EXEMPT CATEGORY
CT PROJECT ID:	MPO ID.:	PM: 83.0 / 83.8		
COUNTY: Shasta County	ROUTE: 299			

IMPLEMENTING AGENCY: Caltrans
PROJECT MANAGER: WENDY LONNBERG

Admin Mod 2

PHONE: (530) 225-4316

EMAIL: wendy.lonnberg@dot.ca.gov

PROJECT VERSION HISTORY (Printed Version is Shaded)

Version	Status	Date	Updated By	Change Reason	Amend No.	(Dollars in whole) Prog Con	Prog RW	PE
11	Official	12/20/2018	KWILLIAM	Amendment - Cost/Scope/Sch. Change	2	9,656,000		
10	Official	09/26/2018	KURLIE	Amendment - Cost/Scope/Sch. Change	1	9,161,000		
9	Official	07/06/2018	KURLIE	Adoption - Carry Over	0	8,561,000		
8	Official	07/10/2018	KURLIE	Amendment - Cost/Scope/Sch. Change	13	9,161,000		
7	Official	08/18/2017	KURLIE	Amendment -	4	8,561,000		
6	Official	09/13/2016	KURLIE	Adoption - Carry Over	0	4,386,000		
5	Official	07/31/2015	KURLIE	Amendment - Cost/Scope/Sch. Change	4	4,386,000		
4	Official	06/24/2014	KURLIE	Adoption - Carry Over	0	1,769,000		
3	Official	07/11/2014	KURLIE	Amendment - Cost/Scope/Sch. Change	10	1,769,000		

* CT Minor Pgm. -

* Fund Source 1 of 1

* Fund Type: SHOPP Advance Construction (AC)

* Funding Agency: Caltrans

	PRIOR	18-19	19-20	20-21	21-22	22-23	23-24	BEYOND	TOTAL
PE									
RW									
CON	7,225,000	600,000	1,414,000	417,000					9,656,000
Total:	7,225,000	600,000	1,414,000	417,000					9,656,000

Comments:

***** Version 11 - 12/20/2018 *****
Per W. Lonnberg's 12/20/2018 email, add new project 2H620 and increase cost for project 3H610.
***** Version 2 - 09/04/2018 *****
Formal Amendment 1 per ABagde 7-6-2018 email of State Minor Program 2018-19 programming. Adds Project 2H730 In Redding at Hilltop Drive OC: Construct right turn lane.
***** Version 1 - 05/09/18 *****
Project data transferred from 2016 FTIP.
***** Version 7 - 07/21/2017 ***** Minor program additions per ABagde confirmation (7-13-2017) of minor program revisions requested by WLonnberg.
***** Version 1 - 05/03/16 *****
Project data transferred from 2014 FTIP. No active years programming at time of draft 2017 FTIP; therefore information only.
***** Version 5 - 07/01/2015 *****
New State Minor Program FY 2015/16 \$2.617M programming per ABagde 7-1-2015 email request. EA-5 4G840 and 4G650.
***** Version 1 - 05/12/14 *****
Project data transferred from 2012 FTIP. Added 14/15 \$909K per WL email 5-15-2014 for new federalized project 4E270.
***** Version 2 - 07/16/2013 *****
Increases EA 4E270 from \$773K to \$860K per 6-24-2013 ABagde email re: 2013/14 minor program group listing.
***** Version 1 - 04/18/2013 *****
NOTE: RTP ID = 5-36,37,46

Shasta County RTPA - Federal Transportation Improvement Program
(Dollars in Whole)
State Highway System

DIST: 02	PPNO: 02-4E270	EA: 02-4E270	CTIPS ID: 211-0000-0108	TITLE (DESCRIPTION): Grouped Projects for Safety Improvements, Shoulder Improvements, Pavement Resurfacing (and/or rehabilitation - Minor Program Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 and Table 3 categories - Railroad/highway crossing, safer non-Federal-aid system roads, shoulder improvements, traffic control devices and operating assistance other than signalization projects, intersection signalization projects at individual intersections, pavement marking demonstration, truck climbing lanes outside the urbanized area, lighting improvements, emergency truck pullovers, etc.)	MPO Aprv: State Aprv: Federal Aprv:
CT PROJECT ID:			MPO ID.:		EPA TABLE II or III EXEMPT CATEGORY
COUNTY: Shasta County	ROUTE: 299		PM: 83.0 / 83.8		

IMPLEMENTING AGENCY: Caltrans
PROJECT MANAGER: WENDY LONNBERG

Prior
PHONE: (530) 225-4316

EMAIL: wendy.lonnberg@dot.ca.gov

PROJECT VERSION HISTORY (Printed Version is Shaded)

Version	Status	Date	Updated By	Change Reason	Amend No.	(Dollars in whole)		
2	Active	09/04/2018	KURLIE	Amendment - Cost/Scope/Sch. Change	1	9,161,000	Prog Con	PE
1	Official	07/06/2018	KURLIE	Adoption - Carry Over	0	8,561,000	Prog RW	

* CT Minor Pgm. -		<u>PRIOR</u>	<u>18-19</u>	<u>19-20</u>	<u>20-21</u>	<u>21-22</u>	<u>22-23</u>	<u>23-24</u>	<u>BEYOND</u>	<u>TOTAL</u>
* Fund Source 1 of 1	PE									
* Fund Type: SHOPP Advance Construction (AC)	RW									
* Funding Agency: Caltrans	CON	7,225,000	600,000	1,336,000						9,161,000
	Total:	7,225,000	600,000	1,336,000						9,161,000

Comments:

***** Version 2 - 09/04/2018 *****
Formal Amendment 1 per ABagde 7-6-2018 email of State Minor Program 2018-19 programming. Adds Project 2H730 In Redding at Hilltop Drive OC: Construct right turn lane.
***** Version 1 - 05/09/18 *****
Project data transferred from 2016 FTIP.
***** Version 7 - 07/21/2017 ***** Minor program additions per ABagde confirmation (7-13-2017) of minor program revisions requested by WLonnnberg.
***** Version 1 - 05/03/16 *****
Project data transferred from 2014 FTIP. No active years programming at time of draft 2017 FTIP; therefore information only.
***** Version 5 - 07/01/2015 *****
New State Minor Program FY 2015/16 \$2.617M programming per ABagde 7-1-2015 email request. EA-5 4G840 and 4G650.
***** Version 1 - 05/12/14 *****
Project data transferred from 2012 FTIP. Added 14/15 \$909K per WL email 5-15-2014 for new federalized project 4E270.
***** Version 2 - 07/16/2013 *****
Increases EA 4E270 from \$773K to \$860K per 6-24-2013 ABagde email re: 2013/14 minor program group listing.
***** Version 1 - 04/18/2013 *****
NOTE: RTP ID = 5-36,37,46