

**DEPARTMENT OF TRANSPORTATION****DISTRICT 6**

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*Making Conservation a  
California way of life*

June 4, 2018

Mr. Tony Boren  
Executive Director  
Fresno Council of Governments  
2035 Tulare Street, Suite 201  
Fresno, CA 93721

Dear Mr. Boren:

Thank you for the opportunity to review the Fresno Council of Governments (FCOG) Draft 2018-2042 Regional Transportation Plan (RTP). Caltrans, at District 6 and various divisions within our Department have reviewed the Draft RTP and collectively offers the following comments.

**TRANSPORTATION PLANNING-DISTRICT 6**

FCOG has demonstrated a strong commitment to support their 20-year planning horizon with focus on the region's transportation options, sustainable growth, economy, improving air quality and building healthier communities. With the distribution of their Public Outreach Strategy helped provide a detailed approach to enlist public participation during each step of the RTP process.

FCOG addresses the four main required elements: Policy Element, Sustainable Communities Strategy (SCS), Action Element and Financial Element which conforms to the RTP Guidelines adopted by the California Transportation Commission (CTC) pursuant to Government Code 65080(d). This plan assesses all forms of transportation available in the County of Fresno as well as travel and goods movement needs through 2042.

FCOG is commended for their efforts in adopting their proposed scenarios and outcomes for their SCS. The Fresno COG Policy Board adopted Scenario D as the Preferred SCS scenario in November 2017. This scenario meets the 2035 GHG reduction target, high investment in road maintenance, assumes balanced growth patterns, land use strategies, and improvements in farmland conservation. Caltrans encourages FCOG to continue to apply for funding resources to further study climate resilience issues in the Fresno region.

FCOG has established an on-going partnership with federal, state, local partners, and stakeholders to consult and cooperate with the public to assist in understanding issues, options, and solutions. FCOG's Public Participation Plan was adopted on July 28, 2016, and has provided direction, participation requirements, strategies and techniques to improve public

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contribution in this RTP process. The creation of an Environmental Justice Subcommittee provided a full, diverse and equitable representation of Disadvantaged Communities and Environmental Justice groups working together to discuss options and solutions to shape the development of the RTP.

The RTP is consistent in demonstrating programming and operations in the development of Intelligent Transportation Systems, identifying methods for measuring its transportation performance and listing constrained and un-constrained projects. Through the Financial element, funding of revenue sources is outlined for the regions planned transportation investments. Ongoing operations and maintenance through resources from MAP-21, FAST Act, Measure C, CMAQ and the new Senate Bill 1 (SB1) (The Road Repair and Accountability Act of 2017) have provided additional funding for transportation projects.

FCOG is commended for their efforts in applying for SB1 - Caltrans Sustainable Transportation Planning Grants and being successful in receiving several awards in Sustainable Transportation Planning, Strategic Partnership and Adaptation grants.

FCOG in partnership with Fresno County Rural Transit Agency (FCRTA) are commended for their continued transit efforts for the County of Fresno. FCRTA continues to be in the forefront of establishing public transit service to rural communities throughout the County of Fresno. FCRTA has enhanced mobility for many of whom lack transportation and need access to jobs, education, and medical services outside their primary area of residence. In continuing their support for sustainable transportation FCRTA, California Energy Commission, CALSTART, Valley Air District and Caltrans celebrated the completion of 13 electric vehicle charging stations that are now open to the public to charge their electric vehicles. It also includes back up energy storage for emergency services. FCRTA selected Envision Solar's EVARC product, which provides EV charging that is solar powered. Furthermore, these stations are located in all 13 of Fresno County's rural, and often disadvantaged communities. FCRTA continues to find ways to help the transit rider where the agency also installed solar-powered bus shelters to existing benches that lack shade and are also located in rural and disadvantaged areas.

## **ENVIRONMENTAL ANALYSIS BRANCH-DISTRICT 6**

All instances of "can" and "should" where the avoidance, mitigation, or minimization measures are required should be replaced with "shall." For example: HW 3.11.3 – The language in the mitigation section stating the project sponsor "can and should obtain all necessary regulatory permits" should be changed to "the project sponsor shall obtain all necessary regulatory permits..."

### **Draft Program Environmental Impact Report, Page 3-121:**

Clarify where in the Migratory Bird Treaty Act does it states that it requires project-related activities be reduced or eliminated at active nesting territories. Also, define what is considered an "active nesting territory."

Additional guidance was provided by the Department of the Interior regarding the Migratory Bird Treaty Act in December 2017. The subject of the memorandum is “The Migratory Bird Treaty Act Does Not Prohibit Incidental Take” in which you will find very specific detail regarding what the Migratory Bird Treaty Act covers.

**Draft Program Environmental Impact Report, Page 3-145:**

The Valley elderberry longhorn beetle does not occur in Fresno county.

**Draft Program Environmental Impact Report, Page 3-148:**

BR 3.5.1-3 – Biological study areas should not be limited in scope to the project impact area but should be broad enough to survey for all species that have the potential to traverse the project limits.

BR 3.5.1-5 – Should be clarified to include sensitive habitat.

**Draft Program Environmental Impact Report, Page 3-149:**

BR 3.5.1-9 - This measure should be revised to account for the possibility that nesting or attempted nesting can be reasonably anticipated to occur between February 1<sup>st</sup> and September 30<sup>th</sup>.

BR 3.5.1-13 – Mitigation should be determined in consultation with the regulatory agencies.

**Draft Program Environmental Impact Report, Page 3-150:**

BR 3.5.1-17 – Additional clarification is requested to explain how road noise minimization with brush and tree planting can effectively mitigate habitat modifications. Furthermore, there are many studies that indicate that vegetative barriers do not significantly reduce road noise. A study supported by the Federal Highway Administration concluded that highway traffic noise was effectively reduced between 3 to 5 dBA by typical belt forests 10 to 30 meters in width. Given the current drought conditions in California, the limited right of way and the minor reduction in noise levels is the planting of up to 30 meters of vegetation a reasonable and effective mitigation measure for noise impacts to threatened and endangered species.

**Draft Program Environmental Impact Report, Page 3-229:**

CTR 3.7.2-5 - The statement does not appear to accurately reflect the Cultural Resources Management process under CEQA.

**Draft Program Environmental Impact Report, Page 3-230:**

CTR 3.7.2-6 - The statement does not appear to accurately reflect the Cultural Resources Management process under CEQA.

CTR 3.7.3 – Does not address mitigation for paleontological resources or unique geological features, nor does it address the significance of those impacts.

**Draft Program Environmental Impact Report, Page 3-322:**

HW 3.11.3 – The California Coastal Commission is listed as a regulatory agency in this section. Fresno County does not fall within the jurisdiction of the California Coastal Commission.

**Draft Program Environmental Impact Report, Page 3-151:**

Other birds of prey occur within Fresno County including the red tailed and red shouldered hawks. Hawks nests are not limited to the foothills, as known nests occur along State Route 99 in the large eucalyptus trees in the southern part of the county and all throughout the county for that matter.

The following figures of version 2-2, 2-3, 2-7, 2-8, 2-10, 2-20, 2-21, 3-15, 4-12 were not legible due to figure being too small to read.

Unable to read the electronic version of Tables 4-1 and 4-3,

**OFFICE OF TRAFFIC OPERATIONS-DISTRICT 6**

**Draft Policies: Policies of the Plan, Page 2-5:**

In Tables 2-1A and 2-1B, there does not appear to be any mention of private developments mitigating their impacts on the transportation network. If private developments do not mitigate their direct impacts or their cumulative impacts, then the operation of the transportation network could degrade. This, in turn, would lead to an increase of greenhouse gas emissions. Government agencies usually lack funding to mitigate such traffic impacts, so it becomes important that private development mitigate their impacts.

**Draft Policies: Policies of the Plan, Page 2-8:**

In Tables 2-1E and 2-1F, under policies, there does not appear to be any mention of access management. With proper access management, the operation of a roadway segment could be optimized. Poor access management could contribute to the poor flow of traffic through a segment. This, in turn, could lead to an increase of greenhouse gas emissions.

**Draft Policies: Policies of the Plan, Page 2-9:**

In Table 2-1G, under policies, there does not appear to be a mention of encouraging companies that maintain large fleets of vehicles to convert to zero emission vehicles. This could also be expanded to include the installation of solar panels for charging the fleet vehicles.

**Draft Policies: Policies of the Plan, Page 2-11:**

In Tables 2-2A and 2-2B, under policies, there does not appear to be any mention of the use of new traffic stripe specifications and new traffic markers that are specifically designed to assist autonomous driving vehicles. As technology improves, autonomous driving vehicles should improve the safety and operation of the transportation network. This would thus lead to fewer accidents and less congestion.

**Draft Policies: Policies of the Plan, Page 2-11:**

In Table 2-2D, under policies, it is recommended that there should be a specific mention of the *California Department of Transportation Highway Design Manual*. There should also be specific mention of the *California Manual on Uniform Traffic Control Devices*, *AASHTO Roadside Design Guide*, and *TRB Access Management*.

**OFFICE OF REGIONAL PLANNING–HEADQUARTERS**

The Office of Regional Planning, Regional Coordination Branch has reviewed the FCOG’s Draft 2018 Regional Transportation Plan (RTP) and Environmental Impact Document (EIR). We offer the following comments:

FCOG is commended for:

- Developing a 2018 RTP that is very clear, interesting to read, well supported with a documented public involvement process, and rich with graphics and illustrations;
- Providing an in-depth look at the *Policies: Foundations of the Plan* which clearly lays out the Goals, Objectives and Policies of the 2018 RTP
- Executing a robust public participation plan with many nodes of access for input throughout the development of the plan.

**Multimodal Discussion:**

**#10, Goods Movement, Page 4-2:**

This could be expanded on to include more *Overview, Accomplishments and Needs Assessment* to better inform the public and better address future needs within the region.

**Financial:**

**#9 Specific Financial Strategies, Page 4-81:**

This section lists TCMs and technology-based measures but does not “address the specific financial strategies required to ensure the identified TCMs from the SIP can be implemented.” Please insert more precise financial strategies that could be implemented.

**Minor Edits:**

Page 4-64 – typo in the first “the” under Overview  
Page 4-81 – typo in first sentence “tdesignated”  
Page 4-81 – typo in (vi) “frfringe”



## **OFFICE OF SMART MOBILITY AND CLIMATE CHANGE-HEADQUARTERS**

The Smart Mobility and Active Transportation Branch champions smart mobility, complete streets, and the state's first bicycle and pedestrian plan, Toward an Active California. We are supportive of community design that is regionally accessible, equitable, and environmentally friendly. We therefore promote active transportation, public transportation, urban-infill development, and urban form. The comments below are made with this ethic in mind.

### **General Comments:**

FCOG should coordinate with Caltrans' Division of Rail and Mass Transportation and the CA High Speed Rail Authority regarding the buildout of the high-speed rail Phase 1, including the integration of housing, transportation, jobs, and services around high speed rail stations. We encourage the development of urban, location-efficient, mixed-use communities with high population and job density centered around all high-speed rail stations.

### **Chapter 2 Comments:**

The Vision for 2042 should include the word "equitable" to address the findings in Chapter 1 related to the County's unemployment rate, educational attainment, and median household income.

Referring to Page 2-4, Active Transportation Goals: Improved bicycle and pedestrian safety through education and enforcement- the language should include the word 'engineering', as roadway design to encourage walking and bicycling will improve the safety of vulnerable road users.

### **Table 2-1B: General Transportation Multimodal System - Future Travel Demands &**

**Financial:** No direct objectives for active transportation except inferred in SB375 related Goal. Two policies call out active transportation and complete streets. In general, it appears more emphasis could be placed on active transportation and complete streets in this section; referring to Table 2-1B: General Transportation Multimodal System - Future Travel Demands & Financial, there appears to be no direct objectives for active transportation except inferred in SB375 related goals. Two policies call out active transportation and complete streets.

### **Chapter 3 Comments:**

We are supportive of the 12 adopted Smart Growth principles listed and encourage FCOG to be a leader in Fresno County for the development of these sustainability solutions.

Referring to Figure 3-22, it appears FCOG's proposed investments prioritize increasing automobile capacity, as this is the highest-expenditure item. We would encourage FCOG to re-allocate more funds toward transportation modes that will integrate with the state's investment in high speed rail- including active transportation (bicycle and pedestrian) and public transit projects and programs.

We are supportive of the regional Bus Rapid Transit network proposal and proposed Active Transportation investments; and as such, would encourage more spending in these categories, especially as they relate to future high-speed rail stations and transit-oriented developments.

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The Transportation Demand Management Strategies neglect to include walking, bicycling and transit strategies. We encourage including concepts including bicycle end-of-trip facilities in office buildings; public transit subsidies for employees; walking and bicycling commuter benefits; and other strategies to improve the Transportation Demand Management strategies listed.

We are supportive of the development of the regional active transportation network, including the proposed 280 bike lane miles and 500 miles of sidewalk to be added by the end of 2042. We would encourage consideration of regional Class IV separated bikeways, per the Fresno and Clovis Class IV Bikeway Feasibility Study findings. We would also support prioritizing the construction of active transportation facilities sooner than 2042.

### **OFFICE OF STATE PLANNING (OSP)-HEADQUARTERS**

We appreciate the opportunity to review and provide comments on the 2018 FCOG's RTP. OSP would like to provide the following comments for you to take into consideration.

#### **Chapter 1, page 1-2:**

Change 'comuter' to 'computer'.

Under computer modeling, it may be profitable to allude to where in the RTP modeling will more extensively be discussed.

#### **Environmental Setting and Existing Air Quality Conditions page 128:**

This information could also be moved to the Regional Setting section.

#### **Page 1-4:**

The word 'nation' is found capitalized and not capitalized on this page.

It is recommended to add at the end of each these comparisons. For example, the county's unemployment rate was x in contrast to y for the state and z for the nation, respectively.

#### **Figure 1-4, page 1-5:**

Reorient the pie chart or use white text on some of the darker sections so that it is easier to read.

#### **Page 1-8:**

Please explain what is the Planning center?

#### **Employment Forecast, fourth paragraph, page 1-9:**

Please add a space between 'acre' and 'Employment' was forecast...

The second sentence should be cited when explaining forecast by ADE. Being used by State of California Employment Development Department, Wood and Poole, and Caltrans.

**Chapter 2 page 2-5:**

Goals, objectives and policies align beautifully with CTP 2040.

**Chapter 3 page 3-3:**

Top of page, 'timeline' is cut off.

Paragraphs under SCS Co-benefits are outlined beautifully, outlining ways to increase livability and how comprehensively designed and managed spaces can help achieve these objectives

**Chapter 3 page 3-5:**

Providing detailed methods on how FCOG will address these GHG targets will be instrumental for urban areas throughout the state struggling to meet their GHG/VMT reduction targets.

**Chapter 3 page 3-6:**

How was ADE selected? What criteria was used?

**Chapter 3 page 3-20:**

It is recommended to use a better layout for the pie graph so that it is easier to read.

**Chapter 3 page 3-24:**

Great call outs to local and regional partners doing innovative work. Provides best practices or 'what is in it for me' for local partners.

**Chapter 3 page 3-25:**

Under Public Outreach, using the language like 'assist', 'inform', or 'obtain' promotes top-down planning approaches. Presenting does not entail innovative outreach. Please indicate in these paragraphs if the public had an active say on the development of the SCS?

Thank you for considering our comments for inclusion of the Final FCOG 2018 Regional Transportation Plan. FCOG is praised for their continued partnership with Caltrans and for their public and stakeholder involvement by demonstrating their strategy in emission-reduction targets, analyzing projected growth, housing needs, and improving transportation in their region. If you have any questions, please contact me at (559) 445-5421.

Sincerely,



LORENA MENDIBLES  
Associate Transportation Planner  
Transportation Planning-North

c: Gail Miller, Michael Navarro, Shane Gunn, David Garza, Albert Lee, Caltrans-D6  
Erin Thompson, Caleb Brock, Ann Mahaney, Dustin Foster, Brian Bulaya,  
Caltrans-HQ's