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Subject: Responses to Comments on the Draft 2027 FTIP and Corresponding Draft Conformity Analysis

Dear Colleagues:

Thank you for your thorough review of the Draft 2027 Federal Transportation Improvement Program (FTIP) and corresponding Draft Conformity Analysis. Fresno COG values the time and expertise that Caltrans staff devoted to reviewing these documents during the 30-day public review period, which ran from July 17, 2026 through August 17, 2026. Your comments and recommendations strengthen the quality and compliance of the final documents, and we appreciate the collaborative spirit in which they were offered.

Fresno COG received a total of 23 comments across the three comment sets. We have reviewed each comment carefully and, where appropriate, have incorporated revisions into the final documents. The responses to each comment are provided below:

Comments from Braden Duran

Date received: August 21, 2026

Submitted via: Email

Subject: Draft Conformity Analysis for the 2027 FTIP & 2026 RTP

Comment: *40 CFR § 93.110(e): Caltrans recommends referencing Chapter 4 to more clearly demonstrate that the conformity determination is supported by the plan's goals, policies, and transportation strategies.*

Response: A reference to Chapter 4 (pages 44–49) has been added to the Conformity

Checklist to document the TCM Findings for the TIP and Regional Transportation Plan section and clarify that the conformity determination is supported by the 2026 RTP's goals, policies, and transportation strategies.

Comment: *40 CFR § 93.118(d): Caltrans recommends citing the chapter in its entirety when documenting the regional emissions analysis and the basis for the conformity finding, rather than referencing individual sections, to ensure it is addressed comprehensively.*

Response: The entirety of Chapter 1 (pages 5–20) was cited to clearly identify the appropriate years for the regional emissions analysis and the applicable SIP budgets.

Comments from Jennifer Ashby-Camp and Peter Kang, PE

Date received: August 17, 2026

Submitted via: Email

Subject: General Comments

Comment: *Project Listing Header Year (pp. 20–124): Every individual project sheet in the "Project Listings by Agency" section carries the header "2026 Federal Transportation Improvement Program" rather than "2027." This appears to be an un-updated report template and affects all approximately 105 project sheets. Please correct the template header before formal adoption so the document is internally consistent with the cover page, Table 1/2 headers, and Grouped Project Listing pages, which all correctly read "2027."*

Response: The corrected headers have been added to the project listings.

Comment: *Missing RTP Reference on Individual Project Listings (pp. 19–124): The individual project sheets do not include an RTP ID number or RTP page reference field. Per 23 CFR 450, every FTIP project should reference the corresponding RTP project so consistency with the 2026 RTP/SCS can be verified. Please add this field to the project sheet template.*

Response: All projects in the FTIP have been added to the RTP Financially Constrained Project Listing and include the same reference numbers.

Comment: *Missing Location/Limits Field on Individual Project Listings (pp. 19–124): The project sheet template includes Sys, Rt, TCM, Model #, CI, and Exempt Category fields, but no explicit location/limits field (city, county, or "Various Locations"). Some project descriptions embed location information in free text, but this is inconsistent across entries. Please confirm each project includes an identifiable location field, consistent with the Grouped Project Listing pages (pp. 125–144), which do include location detail in the project description column.*

Response: The locations have been added to project listings.

Comment: *Table 15 Title Year (Appendix N, p. N-32): "Table 15: Summary of Transit Safety Projects in the 2025 FTIP" should be updated to read "2027 FTIP" for consistency with the rest of Appendix N and the adjacent Tables 10, 13, and 14.*

Response: The header for Table 15 has been updated to reflect the correct FTIP year.

Comment: *Federal/State Planning & Programming Process Flowchart (Exhibit 4, p. 8): Please confirm this flowchart reflects the attached most current Caltrans version of the Federal-State Planning and Programming Process.*

Response: The flowchart has been replaced to reflect the most current version of the Federal-State Planning and Programming Process.

Subject: Financial Summary

Comment: *Table 1 vs. Table 2 – Unprogrammed Revenue (pp. 14, 16): Revenue Total ($925,014K) exceeds Programmed Total ($920,517K) by $4,497K. This entire difference is attributable to the CMAQ ($64,993K revenue vs. $63,630K programmed) and STBGP/RSTP ($69,654K revenue vs. $66,520K programmed) categories. Fiscal constraint is technically satisfied (revenue ≥ expenditures), but please clarify whether this $4,497K is an intentional reserve/holdback of CMAQ and STBG apportionment or should be reconciled to project programming before final adoption.*

Response: The identified difference between total revenues and programmed expenditures is intentional. The unprogrammed balance of approximately $4.497 million is attributable solely to the CMAQ and STBG/RSTP funding categories and reflects a deliberate reserve of available apportionment rather than an omission in project programming. Maintaining a limited balance of CMAQ and STBG funds provides the Fresno COG region with flexibility to address future programming needs, project cost increases, allocation adjustments, and funding actions that may occur during the FTIP period. As such, the revenues shown in the financial plan exceed programmed expenditures by design, while still satisfying all federal fiscal constraint requirements. No reconciliation is necessary prior to adoption, as the difference represents an intentional holdback of available CMAQ and STBG apportionments rather than unprogrammed project funding requiring assignment.

Comment: *SHOPP "Prior" Line vs. State Other "SHOPP G13 Contingency" Line (p. 14 and Table 1 Appendix 3, p. 15): The "SHOPP Prior" row under the SHOPP program ($136,206K in FY29 and $104,050K in FY30, totaling $240,256K) is identical in both years and total to the "Other State – State Cash (SHOPP G13 Contingency)" line reported separately under "State Other" (Appendix 3) that also feeds into the State Total. Please confirm this SHOPP G13 Contingency funding is not counted twice within the $685,719K State Total, consistent with the attached latest Caltrans SHOPP Report.*

Response: Upon review, we confirmed that the SHOPP Prior amounts shown under the SHOPP program were inadvertently duplicated from the Other State – State Cash (SHOPP G13 Contingency) line. This was a clerical error in the preparation of the revenue tables. To correct this, the duplicate SHOPP Prior entry has been removed from the Appendices, and the entire chart has been updated accordingly to ensure consistency with the latest Caltrans SHOPP Report.

Comment: *FTA Section 5310 Program – Revenue Basis for the Four-Year Element (e.g., CTIPS/FTIP IDs FRE150053, FRE170011, and related 5310 entries, pp. 44, 68, 84): Individual FTA 5310 projects show funding only in the current or prior year, with no amounts programmed in FY28–FY30. Since the CTC adopts the Section 5310 project list annually, please add a narrative note clarifying the revenue basis for the FTIP's four-year element and confirming that future-year 5310 awards will be incorporated through subsequent administrative modifications or amendments, consistent with how this is handled for other annually-granted transit programs.*

Response: We have further expanded our explanation in the Financial Plan and Financial Constraint narrative on page 11 to include that the FTIP's four-year element and confirm that future-year 5310 awards will be incorporated through subsequent administrative modifications or amendments, consistent with how this is handled for other annually granted transit programs.

Comment: *Measure C / Regional Sales Tax Revenue Gap (Appendix H, pp. H-6–H-7): Appendix H identifies a 12–18 month gap in Measure C tax revenue collection beginning July 1, 2027, pending the outcome of a March 2028 replacement ballot measure. Table 1 shows Regional Sales Tax revenue declining sharply from $25,116K in FY27 to $273K in FY29, which appears consistent with this gap, but the Financial Constraint Conclusion (p. H-7) does not explicitly reconcile the identified revenue gap with the region's demonstrated fiscal constraint. Please add a sentence connecting these two discussions.*

Response: Appendix H has been revised to explicitly connect the anticipated Measure C revenue transition to the financial constraint analysis. The revised discussion on page H-7 identifies the projected decline in Regional Sales Tax revenues shown in Table 1 and explains that the reduction has been incorporated into the FTIP revenue and programming assumptions. The Financial Constraint Conclusion has also been revised to clarify that the Measure C transition will be monitored and that future programming will be adjusted as appropriate to maintain financial constraint.

Comment: *Pavement Preservation Shortfall (Appendix H, p. H-6): Appendix H identifies a $3.1 billion, 10-year investment need to maintain the region's current Pavement Condition Index (64.8, "Fair") against approximately $854.8 million in projected four-year street and road expenditures. Beyond the City of Fresno's $100 million bond issuance, please describe the region's broader plan (or an explicit acknowledgment of the funding gap) for addressing this shortfall, consistent with the O&M shortfall discussion requirement in 23 CFR 450.324(h).*

Response: Appendix H has been revised on page H-6 to acknowledge the long-term pavement preservation funding gap identified in the 2025 Pavement Management Survey. The revised discussion identifies the combination of local, state, and federal funding sources used by member agencies for pavement preservation, including local revenues, HUTA, RMRA/SB 1, General Funds, and eligible federal funding. The revised language also identifies continued pursuit of discretionary funding and other local financing strategies, while acknowledging that available and reasonably anticipated revenues are not sufficient to fully address the identified long-term pavement preservation investment need. The Financial Constraint Conclusion on page H-7 has also been revised to distinguish the FTIP's financial constraint determination from the region's longer-term pavement preservation funding needs.

Subject: Performance Measures Template

Comment: *Table 14 PTASP Targets – Blank Cells (Appendix N, p. N-31): Several cells in Table 14 (Clovis Transit's "Fatalities (per 10 million VRM)" and "Injuries" raw count; the Regional row's corresponding cells) are left blank rather than populated with a value, including zero. Please populate all cells with the applicable numerical value (which may be zero), consistent with the standard already correctly applied in Table 10's Truck Travel Time Projects row on p. N-24, where "0" and "0.00%" are explicitly shown rather than left blank.*

Response: Regional injuries were listed as "0" but should have been 55.24; this has been corrected. In addition, FCRTA has been removed from the table as they are exempt from

PTASP target setting as reflected in the narrative. The left-hand column label has been modified from "Mode of Service" to "Transit Agency (Bus Transit)".

Comment: *PM3 Summary Table (Table 10, p. N-24) – No Issue: Noted as compliant: the Truck Travel Time Projects row correctly shows explicit zero values rather than blank cells, and the TAM (Table 13, p. N-30) and Transit Safety (Table 15, p. N-32) tables both correctly show 100.0% in the "Total FTIP Investments" row.*

Response: Noted. No Response required.

Subject: Project Listings

Comment: *Grouped Project Listing Naming Conventions (pp. 125–144): Noted as compliant: grouped project titles already use fully spelled-out language (e.g., "Grouped Projects for Safety Improvements," "Grouped Projects for Purchase of Support Vehicles") rather than the "GPF" abbreviation flagged in other MPOs' FTIPs, and toll credits are consistently and correctly labeled as "Local Funds – AC" wherever referenced in project descriptions (e.g., LSTMP413, LSTMP443, LSTMP422).*

Response: Noted. No Response required.

Federal Planning Finding Requirements

Comment: *There is a new requirement for 2027 FTIP and beyond for MPOs to include the MPO Grouped Project Certification Letter. Please reference the "Caltrans' Request for MPO Certification Letter_09-08-25" and include the signed letter with the Final 2027 FTIP. (2027 FTIP Checklist Section #7) Section A-6 does reference the MPO Certification Letter, but Caltrans requires the separate, signed letter on MPO letterhead.*

Response: The final signed version is now included in the document.

Comment: *There is a new requirement for 2027 FTIP and beyond for MPOs to include all federal regionally administered federal discretionary grant projects (regardless of fund source). Please clarify if the projects are included in FCOG's FTIP and/or add a comment that no projects exist. (2027 FTIP Checklist Section #7)*

Response: Appendix O has been added to the 2027 FTIP to include a listing of all regionally administered federal discretionary grant projects.

Comments from Wafaa Siqueiros

Date received: August 17, 2026

Submitted via: Email

Subject: Project Listing Notes

Comment: *Project FRE250005; On CTIPS these are all under the same fund, Roadway Preservation.*

Response: FRE250005 has been changed to reflect this request. The project is still the same, but it is now grouped into lump sum FRE071007. The $73.3 million programmed matches FresnoTrak to SHOPP (1F000).

Comment: *FRE111355; Added 0H240.*

Response: Noted. No Response required. Project indicator added to FresnoTrak.

Comment: *FRE150055; Added 0S370 and revised all funding amounts.*

Response: Project indicator added to FresnoTrak. Project FRE150055 has been confirmed as correct funding amount with Fresno COG Finance Director and Caltrans assisting project manager, Ellery Ellis. Project total should not increase in cost as noted, but instead, has the potential to decrease once sealed bids are unveiled. This can be modified in future CTC procedures.

Comment: *FRE270010; This number is not shown in CTIPS (Crossed out 28/29 funding).*

Response: The project now exists within grouped project FRE071007 as LSMTP1035. Project submitted as FRE270010 with $185.19 million total funding which is the same cost now shown for LSTMP1035. This was due to $117.09 million being added to existing project based off SHOPP. The difference is $68.1 million. Project funding error acknowledged and corrected visually in the project listings. Project will be corrected in the 2027 FTIP submission or the first amendment to the 2027 FTIP. This funding will be eliminated, as the $68.1 million funding for 28/29 was SHOPP G-13 contingency programming which belongs to 1F000 (FRE250005/10300000444).

Comment: *FRE071007 These numbers don't match what is in CTIPS.*

Response: The project totals have been corrected in the FresnoTrak printouts to reflect what is shown in CTIPS ($288.9 million). The 2027 adoption on FresnoTrak also matches this $288.9 million figure.

Comment: *Grouped Project Listings, Caltrans Pages 128-129. Added numbers, made revisions.*

Response: Acknowledged. These small project changes will be made in the Grouped Project Listing sheet. For Project 250006, FCOG will correct the funds to fall into FFY 28/29.

We appreciate your continued partnership and look forward to working with you as these documents move toward final adoption. Should you have any questions about the responses or revisions described herein, please do not hesitate to contact myself or Fresno COG programming staff, Blake Rincon, Associate Regional Planner, brincon@fresnocog.org or (559) 233-4148 Ext. 203 or Erin Haagenson, Senior Regional Planner, ehaagenson@fresnocog.org or at (559) 233-4148 Ext. 205.

Robert Phipps

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