

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life.*

November 23, 2020

GTS# 03-BUT-2020-00166

Mr. Ivan Garcia  
Programming Manager  
Butte County Association of Governments  
326 Huss Lane  
Chico, CA 95928

**Butte County Association of Governments Draft 2020 RTP/SCS**

Dear Ivan Garcia:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans through the lenses of our mission and state planning priorities of infill, conservation, and travel-efficient development. To ensure a safe and efficient transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multimodal transportation network.

**Regional Planning**

Thank you for the opportunity to review and comment on the Butte County Association of Governments (BCAG) Draft Regional Transportation Plan (RTP). Our review concluded that the plan will require additional elements and clarifications to meet state and federal requirements. We would like to offer the comments below to assist in the development of the plan.

General Comments

- Caltrans would like to commend BCAG for providing a well-written and detailed RTP that clearly identifies the region's goals, objectives, and

actions needed to implement the plan.

- BCAG should ensure that the RTP Checklist is updated and accurate as it seems that there are page references that do not correspond with the associated RTP requirement. Below are some examples.
  - General Requirements #4(e): the discussion begins on page 4-18 and there is additional information in Appendix 6-5. Both should be referenced in the checklist.
  - Title VI and Environmental Justice #3: This requirement appears to be fulfilled by the narrative provided on page 3-8.
  - Modal: BCAG should consider referencing other chapters/pages since the referenced chapter only discusses non-motorized modality.
  - Financial #7 and #8: The RTP Checklist references page 3-16, however it appears that the requirement is met on page 3-6.
- For the final draft and final RTP Checklist, BCAG should ensure that specific page numbers are referenced within the appendices.
- In Chapter 4 Sustainable Communities Strategy, BCAG should consider including the 14 key actions within this chapter as well.

#### Action Element

- BCAG should include a discussion on the specific criteria and methodology that was used to prioritize and tier the identified projects with respect to the performance measure it addresses.

#### System Performance Report

- While BCAG identifies total investments in projects identified in the RTP that would be directed towards the Federal Performance Measures, it would be helpful to see more analysis of how the region will plan and program projects to achieve the targets or make significant progress toward achieving each target.
- BCAG is also required to address the federal requirement for Public Transportation Agency Safety Plan (PTSAP) within its RTP. While the PTASP is a requirement for transit operators, BCAG must integrate the transit safety targets in the RTP. Guidance and a helpful Frequently Asked Questions document is available on Federal Transit Administration's website here:

<https://www.transit.dot.gov/regulations-and-programs/safety/public-transportation-agency-safety-program/metropolitan-planning>

- BCAG should also consider including a discussion about how they coordinated with cities, counties, and any other relevant local jurisdictions with respect to federal performance targets.

#### Consultation/Cooperation:

- Appendix 3 Public Involvement Documentation currently does not include any public comments that have been received. In the final draft, BCAG should ensure that all comments are documented, including those that were received during the public outreach and development of the RTP.
- It is unclear if BCAG included a comparison of the California State Wildlife Action Plan as this is not clearly identified in the draft RTP.

#### Modal Discussion

- ORP would like to commend BCAG for their very detailed discussion of transit.
- In the Non-Motorized Transportation chapter, BCAG does a great job of describing the different classes of bikeways. We would like to suggest that BCAG also include an infographic for each classification to help the reader's understanding.
- Figures 8-5, 8-6, and 8-7 are difficult to read. BCAG should consider using a different color scheme or perhaps split the existing and proposed bicycle facilities into separate figures.
- Figures 8-9, 8-10, and 8-11 are also difficult to read. BCAG should consider using a different color scheme or consider enlarging the collision maps.

#### Financial

- On page 3-5, BCAG discusses regionally significant roadways and references Appendix 7 which identifies specific roadways in Butte County that are of regional significance. Yet, no specific projects are identified. BCAG's list of financially constrained projects are in Appendix 10 but any regionally significant projects are not clearly identified. Please ensure that they are clearly labeled in the list of projects.

## State Planning

### Overall Comments

- Figure 4-6 the patterns used for Area B and C are very similar and makes it difficult to differentiate between mid and long-term areas.
- The document does a great job in addressing COVID-19 impacts on the financial side, however more emphasis should be placed on how local agencies are adapting to these new challenges.

### Policy Element

- Butte County is coordinating with the CTP 2040's goals, policies, and strategies, but it might be beneficial to go into more detail about the plan's alignment with the CTP. Also, SB 391 should be mentioned because it addresses the statewide GHG emissions from the transportation sector of AB 32. The following is an example of what could be added:
  - Senate Bill 391 (SB 391, 2009) required the California Department of Transportation to prepare the California Transportation Plan (CTP), the State's long-range transportation plan by December 2015, to reduce GHG emissions and VMT. The Plan states this system must reduce GHG emissions to 1990 levels from current levels by 2020, and 80 percent below the 1990 levels by 2050 as described by AB 32 and Executive Order S-03-05. The CTP 2040 demonstrated how major metropolitan areas, rural areas, and state agencies can coordinate planning efforts to achieve critical statewide goals. It is important to align and implement the goals, policies, and strategies laid out in the CTP 2040, and to continue coordination and collaboration with Caltrans during the development of the CTP 2050 update that will be adopted in December of 2020.

## Smart Mobility and Climate Change

### Policy Element

- Objective 2.3: Add other public engagement methods that BCAG uses, such as bilingual advertising for meetings on buses or social media. Or perhaps 12.3 is a better location for outreach specifics.
- Objective 3.1.1 references BCAG's efforts to increase passenger rail service in Butte County including San Joaquin's Amtrak service to Oroville
- Objective 8.1: Include BCAG's efforts to run transit vehicles using renewable energy/fuel.

### Transit

- Page 7-4 & 7-5: Route numbers and labels on maps are hard to read.
- Figure 7-15: Table shows age of all vehicles is 2 years, but this is inconsistent with the vehicle year.
- Page 7-28: Why are there no routes in the Mid-Term Plan for Southeast Chico, specifically the vicinity of 20<sup>th</sup> Street at Bruce Road? This is the site of huge current and future growth. Thousands of housing units are in the works at Merriam Park, Stonegate, and Valley's Edge. Additionally, the existing Doe Mill neighborhood and the Courthouse at Merriam Park need a bus stop. Currently, Route 7 serves the Courthouse. If this information is from the 2015 TNMP, I hope these needs are being studied currently and will be updated.
- Figure 7-28 and relevant text: Is route 1 replacing the 14 & 17 routes which currently run from DTC, along Park Ave to the Mall area? This would be

### Non-Motorized Transportation

- Page 8-5: Existing Levels of Walking and Bicycling – Educational commutes by walking/biking are not considered work trips by the ACS, and this should be noted as a large percentage of students walk and bike to CSUC and schools.

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### Rail

- Figure 11-1: This map should clarify that the rail line running through Oroville is freight-only, since the title is Passenger Rail Service Map.

### Appendixes

- It would be helpful to reference appendixes in the main document and include the appendix number.

If you have any question regarding these comments or require additional information, please contact Nima Kabirinassab, Intergovernmental Review Coordinator for Butte County, by phone (530) 741-5452 or via email at [Nima.Kabirinassab@dot.ca.gov](mailto:Nima.Kabirinassab@dot.ca.gov).

Sincerely,

*Sukhwinder Takhar*

SUKHVINDER (SUE) TAKHAR  
Deputy District Director  
Planning, Local Assistance, and Sustainability

## **RESPONSE TO CALTRANS COMMENTS:**

### **Regional Planning**

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#### General Comments

- Caltrans would like to commend BCAG for providing a well-written and detailed RTP that clearly identifies the region's goals, objectives, and actions needed to implement the plan.

#### **RESPONSE: Thank you.**

- BCAG should ensure that the RTP Checklist is updated and accurate as it seems that there are page references that do not correspond with the associated RTP requirement. Below are some examples.
  - General Requirements #4(e): the discussion begins on page 4-18 and there is additional information in Appendix 6-5. Both should be referenced in the checklist.
  - Title VI and Environmental Justice #3: This requirement appears to be fulfilled by the narrative provided on page 3-8.
  - Modal: BCAG should consider referencing other chapters/pages since the referenced chapter only discusses non-motorized modality.
  - Financial #7 and #8: The RTP Checklist references page 3-16, however it appears that the requirement is met on page 3-6.

#### **RESPONSE: The RTP Checklist has been updated.**

- For the final draft and final RTP Checklist, BCAG should ensure that specific page numbers are referenced within the appendices.

#### **RESPONSE: Appendices were referenced due to the numerous pages which satisfies the requirement. BCAG will consult with Caltrans on a preferred 2024 RTP/SCS format.**

- In Chapter 4 Sustainable Communities Strategy, BCAG should consider including the 14 key actions within this chapter as well.

#### **RESPONSE: Thank you for the comment. The Chapter has been updated.**

#### Action Element

- BCAG should include a discussion on the specific criteria and methodology that was used to prioritize and tier the identified projects with respect to the performance measure it addresses.

**RESPONSE: Thank you for the comment. Chapter 6 has been updated. BCAG will also expand this discussion as part of the comprehensive update in the 2024 RTP/SCS.**

#### System Performance Report

- While BCAG identifies total investments in projects identified in the RTP that would be directed towards the Federal Performance Measures, it would be helpful to see more analysis of how the region will plan and program projects to achieve the targets or make significant progress toward achieving each target.
- BCAG is also required to address the federal requirement for Public Transportation Agency Safety Plan (PTASP) within its RTP. While the PTASP is a requirement for transit operators, BCAG must integrate the transit safety targets in the RTP. Guidance and a helpful Frequently Asked Questions document is available on Federal Transit Administration's website here:

<https://www.transit.dot.gov/regulations-and-programs/safety/public-transportation-agency-safety-program/metropolitan-planning> • BCAG should also consider including a discussion about how they coordinated with cities, counties, and any other relevant local jurisdictions with respect to federal performance targets.

**RESPONSE: BCAG added a notation in the System Performance Report stating that the PTASP data is preliminary until approval by the BCAG Board in January 2020. BCAG is required to review this with the Transportation Advisory Committee and Board prior to finalizing. The FHWA due date to comply is July 2021. The requirement will be included in the new 2021 FTIP scheduled for adoption in February 2021 and amended into the 2020 RTP/SCS before July 2021.**

#### Consultation/Cooperation:

- Appendix 3 Public Involvement Documentation currently does not include any public comments that have been received. In the final draft, BCAG should ensure that all comments are documented, including those that were received during the public outreach and development of the RTP.
- It is unclear if BCAG included a comparison of the California State Wildlife Action Plan as this is not clearly identified in the draft RTP.

**RESPONSE: BCAG received one letter of comments from Caltrans.**

## Modal Discussion

- ORP would like to commend BCAG for their very detailed discussion of transit.
- In the Non-Motorized Transportation chapter, BCAG does a great job of describing the different classes of bikeways. We would like to suggest that BCAG also include an infographic for each classification to help the reader's understanding.
- Figures 8-5, 8-6, and 8-7 are difficult to read. BCAG should consider using a different color scheme or perhaps split the existing and proposed bicycle facilities into separate figures.
- Figures 8-9, 8-10, and 8-11 are also difficult to read. BCAG should consider using a different color scheme or consider enlarging the collision maps.

**RESPONSE: Thank you for the comment. BCAG will consider expanding this chapter as part of the comprehensive update in the 2024 RTP/SCS. The 2024 RTP/SCS will begin upon conclusion of the Post Camp Fire Regional Study. BCAG will consult Caltrans on a preferred format. New maps and figures are being prepared as part of the Transit and Non Motorized Plan (TNMP) update.**

## Financial

- On page 3-5, BCAG discusses regionally significant roadways and references Appendix 7 which identifies specific roadways in Butte County that are of regional significance. Yet, no specific projects are identified. BCAG's list of financially constrained projects are in Appendix 10 but any regionally significant projects are not clearly identified. Please ensure that they are clearly labeled in the list of projects.

**RESPONSE: The regionally significant road network defines the system in Appendix 7. Within this network, certain projects are included in the financially constrained projects and defined in Appendix 10. For the purposes of categorizing "Regionally Significant Projects", BCAG has labeled the SR 70 Corridor of Projects as the only projects meeting this criterion. The project description has been updated for these projects.**

## **State Planning**

### Overall Comments

- Figure 4-6 the patterns used for Area B and C are very similar and makes it difficult to differentiate between mid and long-term areas.
- The document does a great job in addressing COVID-19 impacts on the financial side, however more emphasis should be placed on how local agencies are adapting to these new challenges.

**RESPONSE: Thank you for the comment. Updated figures will be developed and included in the 2024 RTP/SCS.**

### Policy Element

- Butte County is coordinating with the CTP 2040's goals, policies, and strategies, but it might be beneficial to go into more detail about the plan's alignment with the CTP. Also, SB 391 should be mentioned because it addresses the statewide GHG emissions from the transportation sector of AB 32. The following is an example of what could be added: ○ Senate Bill 391 (SB 391, 2009) required the California Department of Transportation to prepare the California Transportation Plan (CTP), the State's long-range transportation plan by December 2015, to reduce GHG emissions and VMT. The Plan states this system must reduce GHG emissions to 1990 levels from current levels by 2020, and 80 percent below the 1990 levels by 2050 as described by AB 32 and Executive Order S-03-05. The CTP 2040 demonstrated how major metropolitan areas, rural areas, and state agencies can coordinate planning efforts to achieve critical statewide goals. It is important to align and implement the goals, policies, and strategies laid out in the CTP 2040, and to continue coordination and collaboration with Caltrans during the development of the CTP 2050 update that will be adopted in December of 2020.

**RESPONSE: Thank you for the comment. Chapter 2 has been updated to include the example provide.**

## Smart Mobility and Climate Change

### Policy Element

- Objective 2.3: Add other public engagement methods that BCAG uses, such as bilingual advertising for meetings on buses or social media. Or perhaps 12.3 is a better location for outreach specifics.
- Objective 3.1.1 references BCAG's efforts to increase passenger rail service in Butte County including San Joaquin's Amtrak service to Oroville
- Objective 8.1: Include BCAG's efforts to run transit vehicles using renewable energy/fuel.

**RESPONSE: Thank you for the comment. BCAG will consider expanding the Policy Element as part of the comprehensive update in the 2024 RTP/SCS or through an amendment. Updating the policy element would require review of the updated language to its advisory committees and Board prior to approval.**

### Transit

- Page 7-4 & 7-5: Route numbers and labels on maps are hard to read.  
**RESPONSE: Maps are for reference, higher resolution maps are posted online at the B-Line website.**
- Figure 7-15: Table shows age of all vehicles is 2 years, but this is inconsistent with the vehicle year.  
**RESPONSE: Noted, thank you.**
- Page 7-28: Why are there no routes in the Mid-Term Plan for Southeast Chico, specifically the vicinity of 20<sup>th</sup> Street at Bruce Road? This is the site of huge current and future growth. Thousands of housing units are in the works at Merriam Park, Stonegate, and Valley's Edge. Additionally, the existing Doe Mill neighborhood and the Courthouse at Merriam Park need a bus stop. Currently, Route 7 serves the Courthouse. If this information is from the 2015 TNMP, I hope these needs are being studied currently and will be updated.  
**RESPONSE: This is being considered in the TNMP update and will be addressed in the 2024 RTP/SCS Update.**
- Figure 7-28 and relevant text: Is route 1 replacing the 14 & 17 routes which currently run from DTC, along Park Ave to the Mall area? This would be  
**RESPONSE: B-Line no longer has a Route 1 (and a Route 6). Route 1 mentioned in Fig 7-28 was a suggestion that was not directly implemented (as this Mid-Term idea is still several years out). Instead, in 2015, Route 15S was reconfigured into Routes 14 & 17, while Route 15N was changed to just Route 15. These changes helped to fulfill some of concepts proposed by this recommendation. This is being addressed in the TNMP update.**

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*"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"*

#### Non-Motorized Transportation

- Page 8-5: Existing Levels of Walking and Bicycling – Educational commutes by walking/biking are not considered work trips by the ACS, and this should be noted as a large percentage of students walk and bike to CSUC and schools.

**RESPONSE: Page 8-5 has been updated. Thank you for the comment. This comment is being noted to be referenced in the TNMP update.**

#### Rail

- Figure 11-1: This map should clarify that the rail line running through Oroville is freight-only, since the title is Passenger Rail Service Map.

**RESPONSE: Thank you for the comment. The map has been updated.**

#### Appendixes

- It would be helpful to reference appendixes in the main document and include the appendix number.

**RESPONSE: Thank you for the comment. BCAG will consult with the District on a streamlined format as part of the 2024 RTP/SCS update.**