Fresno Council of Governments (FCOG) Transportation Planning Certification Review FINAL

June 28, 2017

Prepared by:

The Federal Highway Administration California Division

The Federal Transit Administration Region IX



Table of Contents

Executive Summary	2
Table 1: Findings, Recommendations and Best Practices	5
Certification Review Introduction, Purpose, and Process	8
Description and Overview of FCOG	
Description and Overview of Feed	
Certification Review Findings, Recommendations and Best Practices	14
Conclusion	
Conclusion	
Appendices:	
Appendix A: Certification Review Participants	
Appendix B: Interviewed Local Elected and Transit Operators	17
Appenaix B: Intervieweu Local Elected und Transit Operators	

Executive Summary

Federal regulations require that the United States Department of Transportation (USDOT) – specifically the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) – jointly review and evaluate the metropolitan transportation planning process of all Transportation Management Areas (TMA) - urbanized areas with populations of 200,000 or greater - every four years.

The certification review process includes:

- A desk audit of information on transportation planning processes, activities, and significant products that result from these processes and activities;
- A site visit by a Federal review team that includes opportunities for input and comment on the transportation process by members of the public, federally recognized Tribal governments, local elected officials, and providers of public and private transit. FCOG's site visit took place on April 4-5, 2017; and
- The preparation and distribution of a Final Report, which summarizes the findings and recommendations of the review team regarding the transportation planning as currently practiced in the TMA region.

The primary focus of the review is to determine compliance with Federal transportation planning regulations and requirements and to establish the extent by which the MPO, the State Department of Transportation, and transit operators in the region work together in carrying out the planning process.

The review also provides the opportunity for the MPO to share its challenges, successes, and actual experiences in carrying out the transportation planning process with the review team. The FHWA and FTA have developed joint certification review guidelines that provide agency field staff with considerable latitude and flexibility to tailor the review to reflect local conditions, issues, and needs. As a result, every certification review is almost always different with contrasting outcomes based on the depth and breadth of the review process.

The FHWA and FTA are also continuously monitoring the transportation planning process in between certification reviews. The certification review process is essentially a "one-time snapshot" of the planning process and is a useful tool in determining whether a TMA is meeting the planning requirements. It is important to note that activities listed below are other means by which Federal agencies may monitor the planning process and its compliances with regulations, statues, and best practices:

 Review of the MPO transportation planning work program (referred to in the regulations as the Unified Planning Work Program; while in California, (the term Overall Work Program (OWP) is used) that identifies the work that will be carried out using Federal transportation planning funds, as well as work products and responsible parties;

Review of the MPO's 20-year Long-Range Transportation Plan, which should be inclusive of all area modes funded with Federal transportation monies and must be financially constrained to the amount of funding expected to be reasonably available during the Plan's timeframe;

Metropolitan and statewide transportation improvement program actions;

Progress in implementing the Congestion Management Process (CMP);

- Air quality conformity determinations (in non-attainment and maintenance areas), including the quality of the technical process, and the models and methodologies used; and
- A range of other formal and less formal involvement by both the FHWA and FTA.
 Examples include face to face meetings to discuss specific planning issues, telephone calls, email coordination, etc. Results from these other activities were taken into account during the certification review.

The review process is designed to focus on the current topics of significance in each Metropolitan Planning Area and the Final Report summarizes what the Federal review team found during the certification review, and includes, as applicable, Commendable Practices, Recommendations, and Corrective Actions. The Federal review team will only issue a Corrective Action if a deficiency is found that does not meet the planning requirements. The report and final actions are the joint responsibility of the appropriate FHWA and FTA field offices.

A Federal review team of FHWA and FTA staff conducted a site visit on April 4-5, 2017. During the site visit, there were discussions between the review team and FCOG staff, a public listening session, and interviews with FCOG local elected and transit government officials.

FCOG's 2017 certification review focused on assessing the agency's compliance with updated metropolitan transportation planning provisions of the Fixing America's Surface Transportation (FAST) Act, and strategic FHWA and FTA initiatives including:

- FAST Transitional Issues
- Organizational Structure and Board Administration
- o Metropolitan Planning Area Boundaries, Agreements, and Contracts
- Financial Planning and Fiscal Constraint
- Federal Transportation Improvement Program (FTIP), Air Quality/Transportation Conformity, and Congestion Mitigation
- o Public Participation, Title VI/Environmental Justice (EJ), and Tribal Governments

- Regional Transportation Plan (RTP)
- o Project Selection and Monitoring, and Program Delivery
- Overall Work Program (OWP)
- Congestion Management Process (CMP)
- Bicycle and Pedestrian Planning
- o MAP-21, FAST and Performance Based Planning

The body of this report contains applicable Recommendations, and Best Practices. Recommendations provide potential MPO practice improvements, and best practices highlight items found as exemplary. A summary of these items are provided in Table 1.

Review Outcome

FHWA and FTA jointly certify that the metropolitan transportation planning process performed by the Fresno Council of Governments (FCOG) substantially meets requirements of 23 Code of Regulations (CFR) § 450, and all other applicable requirements. Additional information regarding all findings and recommendations may be found in the relevant sections of this report.

Focus Area	Findings	Corrective Actions	Recommendations	Best Practices
Congestion Management Process (CMP) (23 CFR § 450.322)	FCOG has done an excellent job in revamping its CMP network and overall process since 2013. Effort has included establishing a CMP committee to oversee the process and retaining a consultant to develop a web based data collection, analysis and storage tool.			FCOG's web based congestion analysis tool will be submitted to FHWA News as an example of a best practice to shared on a national basis.
Metropolitan Planning Agreements and Contracts (23 CFR § 450.314)	FCOG's agreements and contracts are up-to-date. It was noted that as the Performance Measures are established and targets selected that the MPO and Caltrans will need to develop agreements on data collection, sharing and distribution.			DASIS.
Financial Planning and Fiscal Constraint (23 CFR § 450.324)	FCOG is in compliance with federal requirements. No substantial issues or problems were found.			
Development/ Content of RTP (23 CFR § 450.324)	FCOG meets federal transportation planning requirements. The State of California's SB 375 and Blueprint/Greenprint requirements/initiatives have led to a continuing and highly			

Table 1: Findings, Recommendations and Best Practices Summary

	visible long range planning effort in the SJV, with extensive engagement of the public and resource agencies in development of the RTPs in all 8 SJV MPOs including FCOG. FCOG's RTP also contains chapters that are developed cooperatively with the other SJV MPOs to strengthen a number of planning objectives Valley wide, including freight and goods movement planning.		
Air Quality/ Transportation Conformity, and Congestion Mitigation (40 CFR § 93, Clean Air Act)	FCOG in compliance with AQ conformity procedures and is an active participant in the SJV IAC process.		
Public Participation, Visualization, Title VI/EJ, and Tribal Governments (23 CFR § 450.316, Executive Order (E.O.) 12898)	FCOG has continued, since the 2013 review, to conduct extensive public participation for its RTP and FTIP updates, keep its PIP updated, and maintains a very active and positive relationship with Tribal governments in the area. FCOG has taken the extra step of performing an evaluation of its public involvement activities and has adjusted its activities based on the evaluation.		
OWP, Planning Factors, Planning Studies, and Self- Certification	FCOG Is in compliance with federal transportation planning requirements.		

(23 CFR §§				
450.306, 450.308,				
450.318, and				
450.336)				
Organizational	FCOG has added "Board			
Structure	Member/MPO 101" training for its new Board members to			
(23 CFR § 450.310)	assist them in becoming			
430.3107	quickly comfortable in their			
	new role and how the MPO			
	process works.			
	The Federal Team notes that during the meeting with the			
	elected officials a very			
	positive relationship with the			
	MPO staff and the Board is		an en voor die geen noem een werden. Ander die die die geen waarde die die die die die die die die die d	
THE REAL PROPERTY OF THE PROPERTY OF THE REAL PROPE	readily apparent.		The Review Team	
Performance	FCOG has participated actively in Caltrans-sponsored		strongly encourages	
Based Planning and	activities regarding the Safety		FCOG to remain	
Programming	PM.		engaged in the	
(23 CFR §			process as PM	
450.306)		under an der Beitrick der sind der State in der State i	moves forward and to not "wait" in	
			developing its	
			approach to PM.	
Consultation	FCOG is actively engaging all		FHWA will work	
and	of its partners based on		with FCOG to obtain	
Coordination	discussion at the site visit;		examples of good practice and get the	
with Tribes,	however, FCOG needs to document this process and to		FCOG process	
Management	do so separately from what is		written and adopted	
and Resource	outlined in its PIP.		before the next	
Agencies (23			Certification Review.	
CFR § 450.316) Non-Motorized	FCOG was one of 10 MPOs		FCOG has done an	
and Pedestrian	selected by FHWA to		excellent job in	
Planning (23	participate in the Bicycle-		engaging its	
CFR § 450.306)	Pedestrian Count Technology		planning partners in	
	Pilot Program. FCOG		developing a strong non-motorized	
	successfully completed the pilot and is continuing to		element to its	
	expand its bicycle/pedestrian		planning process.	
	counting activities on a		FCOG is encouraging	
	regional basis with the		to continue	

eq	uipment acquired as part of		ncing and
the	e pilot program grant.	expan plann	iding this ing effort.
· · · ·			
	and a second second Second second		

Certification Review Introduction, Purpose and Process

Background

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) are required, at least every four years to jointly review and evaluate metropolitan transportation planning processes for each urbanized area with population greater than 200,000, referred as transportation management areas (TMA). After completion of these reviews a joint certification by the FHWA and FTA results if transportation planning processes are determined to substantially meet federal planning requirements.

Each review covers actions by all agencies (States, metropolitan planning organizations (MPO), transit operators, and local governments) charged with cooperatively carrying out day-to-day processes. Failure to certify is significant and may result in withholding of United States Department of Transportation (USDOT) funds. Other reasons the review is conducted are for enhanced planning process quality, and for an assurance that federally funded projects are being advanced without delay.

Purpose

Planning certification reviews serve several purposes:

- To evaluate the transportation planning process in metropolitan areas;
- To identify and correct any areas that are determined to be out of compliance with federal laws and regulations; provide recommendations that may help strengthen planning process aspects;
- To offer opportunities to recognize planning process best practices which is equally important as identifying potential improvements; and
- To provide opportunities for the MPO staff, locally elected officials, transit operators, Indian Tribes (if located in MPO study area) and the public to have an interactive discussion with the Federal Review Team about the transportation planning process in the region.

For this review of the Fresno Council of Governments (FCOG) transportation planning processes, the review team evaluated products and materials including the Regional Transportation Plan (RTP), Federal Transportation Improvement Program (FTIP), Overall Work Program (OWP), Congestion Management Process (CMP), and other relevant areas that all may be referred to in the "Results of Certification Review" section of this document. Specific objectives of this review focused on determining if:

- Overall planning activities of FCOG are conducted in accordance with USDOT regulations, policies, and procedures – including provisions of the Fixing America's Surface Transportation (FAST) Act, 23 Code of Federal Regulations (CFR), Clean Air Act (CAA), Title VI of Civil Rights Act, etc. as applicable.
- 2) FCOG's regional transportation planning processes are continuing, cooperative, and comprehensive, which result in development, implementation, and support of transportation system preservation and improvements.
- 3) FCOG's OWP adequately documents transportation planning activities and other significant transportation planning activities occurring in the region.
- 4) Regional transportation planning products, including the FTIP and RTP, reflect identified transportation needs, priorities, and funding resources.
- 5) FCOG's RTP is multimodal in perspective, meets the needs of the traveling public and community, and is based on current data.

Process

Prior to the site visit, the Federal review team conducted a "desk review" of the files and documentation pertaining to the area's transportation planning process (including the findings and recommendations of the last certification review).

The Federal Review Team submitted to FCOG the following list of planning process elements and/or documents identified in federal transportation planning regulations or in FHWA and FTA guidance. FCOG provided documentation and links to facilitate the desk review.

- Regional Transportation Plan (RTP)
- Federal Transportation Improvement Program (FTIP)
- Overall Work Program (OWP)
- o Public Involvement Process
- Title VI, ADA Environmental Justice documents/procedures
- Congestion Management Process
- List of Obligated Projects
- Travel Demand Forecasting documentation
- o Air Quality Conformity documentation
- Self-Certification/Procurement Procedures
- Financial controls documentation
- Performance Measures documentation
- Financial Planning/Fiscal Constraint documentation
- o Organizational Structure, Board Membership and Planning Boundaries
- \circ $\,$ Agreements and Contracts for the regional transportation planning process
- Consultation and Coordination with Federal, State and local agencies (i.e, formal memoranda or agreements)

FHWA and FTA further requested the FCOG provide summarized responses to any major changes to the regional planning process since the 2013 review:

- FAST Act Transitional Issues
- Performance Measures/Performance Based Planning and Programming
- o Organizational Structure, Board Membership and Planning Boundaries
- Agreements and Contracts
- Overall Work Program (OWP)/Self-Certification/Procurement Procedures
- o Regional Transportation Plan (RTP)
- o Federal Transportation Improvement Program (FTIP) and Project Selection
- Program Delivery/Project Monitoring
- o Financial Planning/Fiscal Constraint
- Public Participation/Public Involvement
- Title VI, ADA and Environmental Justice
- Congestion Management Process (CMP)
- o Intelligent Transportation Systems (ITS)
- Environmental Mitigation
- Consultation and Coordination with Tribes, Federal and State land management agencies
- Travel Demand Forecasting
- Safety in the Transportation Planning Process
- o Security in the Transportation Planning Process
- Air Quality Conformity
- Visualization Techniques
- Integrating Freight into the Transportation Planning Process
- Land Use and Livability
- Pedestrian and Non-Motorized Transportation

FHWA and FTA staff reviewed all of the materials FCOG provided prior to the site visit. The review team met to coordinate the agenda, make sure core MPO functions and activities had been addressed in the documentation, and prepared questions designed to focus on significant topics and on major changes to FCOG's planning process since the 2013 certification review.

The FHWA and FTA conducted the site visit on April 4-5, 2017, at the FCOG office located at 2035 Tulare Street, Suite 201, Fresno, CA.

The following topics comprised the bulk of the discussion at the site visit:

- Follow-up on 2013 Certification Review Findings/MAP-21/FAST Transitional Issues
- o Agreements
- Refresher –Structure of FCOG Board and Committees
- Upcoming RTP Update Process
- Revamp of Fresno COG CMP Process
- Travel Forecasting Process Changes and Highlights

o Coordination with Tribes and Land/Resource Management Agencies

- o Freight Planning
- Changes to Public Involvement Processes/Title VI/EJ
- o High Speed Rail and Transit Planning
- o Transit Asset Management
- o Performance Based Planning Safety
- o Current Performance Measures Used in FCOG Planning and Programming Processes

The Federal Review team also held meetings with the local transit operators, locally elected officials, and held a public listening session the evening of April 4, 2017.

Description and Overview of FCOG

Fresno COG is a voluntary association of local governments, one of California's 38 regional planning agencies, and one of 500+ nationwide. In 1967 elected officials of Fresno County and its incorporated cities formally created the agency, formalizing Fresno COG in 1969 through a Joint Powers Agreement. Fresno COG undertakes comprehensive regional planning also staffs the Metropolitan Planning Organization (MPO) for the Fresno, CA urbanized area.

Fresno COG's Member Agencies are:

- o City of Clovis
- o City of Mendota
- City of Coalinga
- City of Orange Cove
- o City of Firebaugh
- City of Parlier
- o' City of Fowler
- o City of Reedley
- o City of Fresno
- o City of San Joaquin
- o City of Huron
- o City of Sanger
- o City of Kerman
- o City of Selma
- City of Kingsburg
- o County of Fresno

FCOG has a "double-weighted" voting system, which provides for an urban/rural balance of representation on Board matters. Each member has a percentage vote based on population. To approve any action the vote must pass two tests:

Agencies representing over 40% of the population must be in favor of an action, and
 A Majority of all the members must support the action, that is, nine of the sixteen members.

Fresno County is the second largest county in the San Joaquin Valley, encompassing approximately 6,000 square miles. With over \$7 billion a year in commercial crop production it is the nation's leading agricultural-producing county. The January 2016 population of 984,541 places Fresno as the tenth most populous of the 58 California counties. There are fifteen incorporated cities, three federally recognized Native American Tribes and the county contains a federally-recognized urbanized area - the Fresno Clovis Metropolitan Area - with a 2016 population of about 628,492. The county is composed of four distinct geographic areas; the coastal range on the west, the San Joaquin Valley in the central portions, the Sierra Nevada foothills to the east of the valley, and the Sierra Nevada Mountains along the eastern boundary. Fresno County contains portions of the Sierra and Sequoia National Forests, a portion of Kings Canyon National Park and provides a major access to Sequoia National Park and Yosemite National Park.

More detailed documentation of the planning process of FCOG, the organizational structure, program areas and responsibilities, as well as the required Federal and State of California planning and transportation documents, agreements, data, lists of staff and elected officials can be found at: http://www.fresnocog.org

Certification Review Findings, Recommendations and Best Practices

The Review Team had informative and detailed discussions with FCOG staff, the FCOG Board, the Transit Operators and the public about the regional transportation planning process. No Corrective Actions were identified in any major core planning function area. A number of findings, recommendations and best practices have been identified for consideration and dissemination:

Finding

Developing a more robust CMP process at FCOG has been identified as an issue in past certification reviews. In the past 18 months, FHWA has worked with FCOG staff in an CMP revamping process that involved the establishment of a CMP Steering Committee, definition of a much more compact and refined CMP network, and the retention of a consultant to assist FCOG in the CMP revamp.

Best Practice

FCOG in conjunction with its Steering Committee and consultant has developed a state of the art web based tool for monitoring and analyzing congestion in the region. Once documentation is completed and the site is cleared for use by the public, FHWA will work with FCOG to highlight this as a Best Practice article in a future issue of FHWA News.

Finding

FCOG has been actively involved with Caltrans sponsored workshops regarding the Safety Performance Measure, and has been evaluating its own internal data and planning driven performance measures to determine what steps need to be taken to prepare FCOG for the transition to Performance Based Planning and Programming.

Recommendation

FCOG is strongly urged to not "wait" for the other PMs mandated by MAP-21 to come out but to continue to aggressively monitor the rule making process and to continue moving forward aggressively in transitioning to PM based planning and programming in its own transportation planning process.

Finding

23 CFR § 450.316 requires that MPOs engage in consultation and coordination with Tribes, Land and Resource management agencies located in their planning area. While it was clear from discussions with FCOG staff, elected officials and transit operators that consultation and coordination is taking place, in line with the most recent Planning Finding FCOG needs to document that activity and process separately from its public participation activities.

Recommendation

FHWA will assist FCOG in obtaining examples of best practice documentation so that FCOG can document its process and adopt formally if desired by the FCOG Policy Board.

Finding

FCOG was selected by FHWA to participate in a pilot project of testing bicycle counting methodologies and technology. FCOG successfully completed the pilot program and has continued to use the equipment to enhance its regional bicycle and pedestrian planning activities.

Recommendation

FHWA strongly urges FCOG to continue expanding its bicycle counting and planning activities on a regional basis and provide an example of good planning practice in actively engaging nonmotorized transportation as part of its planning process and mobility solutions.

Conclusion

The outcome of this review is a determination whereby FHWA and FTA jointly certify that FCOG's planning process substantially meets the requirements of 23 CFR § 450, FAST and all other applicable legislation. FCOG is commended for its public outreach engagements and strong collaboration with regional partner agencies in developing transportation solutions and delivering technical competencies. We thank FCOG staff for their tremendous assistance and cooperation in making the certification review informative, productive, and a positive exchange of frank discussions.

Appendix A Certification Review Participants

Scott Carson Eric Eidlin Tashia Clemons Jacqueline Kahrs Michael Navarro Lorena Mendibles

FCOG Staff

Tony Boren Kristine Cai Brenda Veenendaal Lauren Dawson Kai Han Peggy Arnest **Suzanne Martinez** Muyi Zhou Lang Yu Trai Her-Cole Jennifer Soliz Meg Prince Seth Scott Donna Blocker Esperanza Velazco Les Beshears Toni Graham Lisa Xiong Stephanie Maxwell Jeaneen Cervantes

FAX/COG Staff

Jeff Long Todd Sobrado FHWA, California Division FTA, Region IX FHWA, California Division Caltrans, HQ Caltrans, District 6 Caltrans, District 6

Executive Director Principal Transportation Planner Administrative Services Manager Senior Regional Planner Senior Regional Planner Associate Regional Planner GIS Specialist

Measure C Administrative Marketing Specialist Measure C Rideshare Technician Finance Director Accounting Manager Assistant Accounting Manager Receptionist Office Administrator

Senior Regional Planner Marketing/Planning Coordinator

Appendix B Local Elected Officials and Transit Operators

COG Board

Bob Whalen Nathan Vonsburg **Brady Jenkins** David Cardenas Lee Brand **Rey Leon Rhonda Armstrong** Michelle Roman Rolando Castro Victor Lopez Alma Beltran Anita Betancourt Amarpeet Dhaliwal Frank Gonzalez Michael Derr Sal Quintero

Mayor, City of Clovis Mayor, City of Coalinga Mayor, City of Firebaugh Mayor, City of Fowler Mayor, City of Fresno Mayor, City of Huron Mayor, City of Kerman Mayor, City of Kingsburg Mayor, City of Mendota Mayor, City of Orange Cove Mayor, City of Parlier Mayor, City of Reedley Mayor Pro Tem, City of San Joaquin Mayor, City of Sanger Mayor, City of Selma Supervisor, County of Fresno

Fresno County Rural Transit Agency

Moses Stites Sandra Mesa Maria Gacica Glbert Garza

Fresno Area Express

Gregory Barfield

Clovis Transit

Amy Hance

General Manger Accounting Manager Administrative Assistant Associate Transit Planner

Assistant Director

Transit Supervisor

Appendix C Public Listening Session

The notice for the Public Listening Session notices was posted to FCOG's website prior to the session, which was held on April 4, 2017 at FCOG's offices at 2035 Tulare Street, Suite 201, Fresno, CA. Two members of the public attended the meeting. The review team also received written comment which is attached to this appendix. Primary comments centered on people and goods movement, and congestion on major regional travel facilities such as CA-99.

4/30/17

DEAR MR. SCOTT CARSON,

IT IS RARE FOR THE PUBLIC TO BE ASKED FOR OUR INPUT ON HOW TO IMPROVE OUR COMMUTING PROBLEMS, SO I HAD TO VOICE MY CONCERNS, I AM A RETRED FEDERAL EMPLOYEE OF 37 YEARS WHO HASN'T MISSED EVEN ONE ELECTION. I HAVE LIVED IN NORTHWEST FRESNO FOR 25 + YEARS, DURING THE LAST IS YEARS, A MAGNITUDE OF NEW HOUSM'S TRACTS HAVE BEEN ERECTED. THE PROBLEM WITH THIS IS THERE HAS BEEN ZERO IMPROVEMENTS TO ACCOMODATE THE IMMENSE INCREASE IN TRAFFIC. TO UNDERSTAND THIS HORRIFIC DILEMMA, PLEASE OBSERVE TRAFFIC AT ASHLAN/99 OVERPASS FROM Z:30-6:30. (NOW THAT CLINTON OVERPASS IS UNDER CONSTRUCTION, ADD 1/2.HOUR WAT) ALSO SHAW (O 99 - ANYTIME. WE DESPERATELY NEED Y LANKES + LIGHT SYNCING., SHAW AND POLK INTERSECTION IS A TOTAL JOKE/NIGHTMAREN

THE CITY CONTINUES TO ALLOW NEW HOUSING DEVELOPMENTS WITHOUT CONSIDERATION OF ANY EXPANSION FOR TRAFFIC. EVEN IF THE VETERANTS BLUD PLAN HAPPENS, THIS DOES NOTHING-FOR EAST/WEST TRAVEL.

IF THERE IS TRULY ANYONE AT THE FEDERAL HIGHWAY ASN AND THE FEDERAL TRANSH ASSN THAT MAY SHOW SOME CONCERN FOR OUR CITY, PLEASE HELP TO ALLEVIATE THESE NIGHTMARES. NORTHWEST FRESNO HAS BEEN IGNORED FAR TOO LONG. THANK YOU FOR YOUR TIME AND CONSIDERATION,

PATRICIA ADAME

MAJOR CONCERNS-ASHLAN/99 OVERPASS SHAW 199 OVERPASS POLK / SHOW INTERSECTION

COPY TO - ERIC EDLIN

DEAR MR CARSON; APR 07 2017 WHY IARE YOU AND ASSOSIATES SPEND-ING ALL THES TIME AND MEETINGS ON DISCUSSING HWY FUNDS BEFORE THESTATE OF CALIF. HASN'T BE GONA TO "PAY BACK" THEY HAVE STOLNDED FROM OUR STATE FUEL, WHAT., COMM., ETC. FRES YOU CAN COME TO ANY CONCOLUSIN YOU WANT, BUT UNTIL YOU REALIZE THAT THE STATE OF CALIF. WILL STEAR THE MONEY FOR OTHER PURPOSES, YOU ARE WASTING TAX PAYERS TIME AND milton J. maye P.S. THIS EXURSISE MY HELP YOU AND YOURS KEEP YOUR POSISTIONS; BUT NOTHING ELSEOF GOOD WILL HAPPEN