

March 24, 2023

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CC: Christopher Xiong, David Padilla, Lorena Mendibles, Alec Kimmel, Caltrans – D6  
Jennifer Duran, Caltrans Headquarters  
Jasmine Amanin, FHWA  
Nick Hernandez, FTA

Mr. Navarro:

Fresno Council of Governments (Fresno COG) received your 2023/2024 Draft Overall Work Program (OWP) review letter on March 9. After careful review and discussion, Fresno COG staff has edited the draft OWP in accordance with your suggestions. We have attached responses to each of your comments, documenting how and where in the OWP a change was made.

Fresno COG appreciates your recognition of our work as forward-thinking, displaying leadership with our current priorities for transportation planning. We will continue to maintain and improve, whenever possible, the collaboration and coordination with Caltrans and the member agencies, including the Native American Tribes in our region.

Thank you for supporting our commitment to identifying capacity constraint problems associated with the local and regional circulation systems for all modes and developing a phased schedule for implementing improvements. We also appreciate you supporting our exploration of micro-transit strategies to encourage transit usage in the region, and the feasibility of developing a regional, vehicle-miles-traveled (VMT) mitigation program.



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## **Fresno COG's Response to FY 2023/2024 Draft OWP Review Letter:**

### **Transportation Planning – District 6**

General Comments: FCOG and Fresno County Rural Transit Agency (FCRTA) are commended for their continued coordination and efforts in improving mobility for residents who lack transportation to essential services such as access to jobs, education, and medical services that are outside their primary area of residence.

*Response: Thank you for the commendation on Fresno COG's coordination efforts to improve mobility for residents who lack transportation to essential services.*

### **Native American Liaison – District 4**

Comment: Caltrans acknowledges FCOG's efforts in promoting a public involvement process by coordinating with the local tribes, specifically with the Big Sandy Rancheria Band of Western Mono Indians, Cold Springs Rancheria, and Table Mountain Rancheria. FCOG is encouraged to find ways to assist Big Sandy Rancheria Band of Western Mono Indians in acquiring funds to address the evacuation plan noted in the SB1 FY 19/20 Big Sandy Rancheria Band of Western Mono Indians National Evacuation Plan. Please continue to enhance public participation and ensure meaningful tribal input is provided for all future transportation programs affecting Tribal government and continue their government-to-government coordination with other local tribes of Fresno County.

*Response: Fresno COG thanks Caltrans for the acknowledgement of our tribal coordination efforts. COG will further its efforts by researching funding sources and offering assistance where needed to the Big Sandy Rancheria Band of Western Mono Indians for implementation of its evacuation plan.*

### **Title VI – District 6**

Comment: Caltrans acknowledges FCOG's proactive approach in implementing environmental justice and Title VI principles to all their planning and decision-making processes, and relaying funding opportunities and technical assistance to underprivileged communities. Caltrans encourages FCOG to continue its efforts to comply with Title VI requirements and to involve and include all underserved groups in Fresno County.

*Response: Thank you for the recognition of our work with EJ and underprivileged communities. Fresno COG will continue its efforts to comply with Title VI requirements and to involve and include all underserved groups in Fresno County.*

## **Work Element Specific Comments**

### Work Element 150 – Other Modes

Comment: Task 150.07 mentions participating in committees for the San Joaquin Valley Goods Movement Sustainable Implementation Plan and the San Joaquin Valley I-5 Goods Movement Safety Corridor Study. It is unsure if the monthly meetings will be special, separate meetings, or they will be discussed at the FCOG regular meetings. Please clarify the meeting intervals and if they are to be discussed at FCOG's Technical and Policy Committees.

*Response: Thank you for your comment. The meetings will be held separately from Fresno COG meetings. In addition to those monthly meetings, these tasks studies will be agenized for discussion at San Joaquin Valley Policy Council and San Joaquin Valley COG Directors' meetings.*

Comment: Regarding the Bicycling and Pedestrian Facilities and Complete Streets, FCOG should consider implementing bike-share programs that can help improve connection such as first-mile / last-mile connections around transit.

*Response: Thank you for your comment. Fresno COG aims to integrate bike-share programs into the 2023 Regional Active Transportation Plan update to improve connections around transit.*

### Work Element 152 – High-Speed Rail Planning

Comment: It states, "The City of Fresno is taking the lead on station-area planning, with the passenger station functioning as an intermodal facility, including access to the station by FAX and Rural Transit Agency public transit." Please clarify which modes specifically will be included in the intermodal facility.

*Response: The referenced sentence in WE 152 has been edited to now state the following: The High-Speed Rail Authority is taking the lead on station-area planning, with the passenger station functioning as an intermodal facility with fixed-route, paratransit, regional and micro transit, rail (Amtrak), Uber/Lyft and taxi connections serving Fresno Air Terminal and locations throughout Fresno County. The station will also incorporate a variety of charging stations powered by solar sources.*

### Work Element 154 – Regional Active Transportation Plan Update

FCOG should consider implementing bike-share programs to help improve connections such as first-mile/last-mile connections around transit. This can also include integrating transit hubs as part of the Regional Active Transportation Plan to help improve connectivity and encourage active modes of transportation potentially.

*Response: Thank you for your suggestion. Information has been inserted under the discussion section in Work Element 154 to address your comment. The 2023 Regional Active Transportation Plan update has identified connection to transit stops and incorporates emerging mobility devices such as electric bicycles and scooters, which will greatly extend mobility without cars. Fresno COG will request the consultant to address integrating transit hubs into the plan update to improve connections around transit.*

While videoconferencing and web-based public input certainly help expand opportunities for public engagement, FCOG should also consider including language to incorporate other public outreach strategies within this work element to clarify better strategies that are being utilized either in-person or through surveys.

*Response: In response to your comment, Work Element 154 has been revised to reflect additional planned community outreach for the 2023 Regional Active Transportation Plan (ATP Plan) update. Fresno COG staff and the consultant will host in-person booths at existing community events, as well as stand-alone workshops/events. Web-based outreach tools will also include a project website, press releases, social media content, an online interactive map, and surveys in both English and Spanish.*

#### Work Element 163 – Freight Movement and Planning

The objective states, "To coordinate with local, statewide, and federal freight planning efforts." It is recommended to add state freight planning efforts to this sentence.

*Response: Thank you for your comment. The sentence has been edited to state the following:*

*To coordinate with local, statewide, and federal freight planning efforts, Fresno COG coordinates a comprehensive freight planning effort at the local and regional level and aims to achieve federal and state goals related to freight movement and economic vitality.*

#### Work Element 174 – California Inland Port Project Planning Phase 4

For all the work elements listed above, it is noted that "By shifting most of the cargo truck traffic off the highway and roadway system, preliminary analysis performed by the San Joaquin Valley Air District and the California Air Resources Board show a potential 93% reduction of greenhouse gas emissions along with increased safety and decreased road congestion." Will the trains be electric or use other clean forms of energy to reduce GHG emissions to potentially 93%? Please specify if these strategies are being used as part of the study/plan.

*Response: Thank you for your comment. By shifting most of the cargo truck traffic onto rail, this study did not evaluate clean energy trains, but rather clean energy trucks (hydrogen/electric) for the short-haul distribution of goods once they reach a trade port. The strategies in the study/plan include multi-modal logistics for transporting cargo, imports and exports to and from Southern California into the San Joaquin Valley on State Route 99. The clarification was added to page 81 under Background and Discussion.*

#### Work Element 173 – Regional VMT Mitigation Program Study

The tasks list numbering does not match the numberings on the Task Description table.

*Response: Thank you for your comment. The task description timeline table has been updated to match the task list.*

### Work Element 178 – Fresno-Clovis Metropolitan Managed Lane Study

Formatting issue within the sentence, "Congestion increases air pollutants, leads to more greenhouse gas emissions, and reduces...." There seems to be a large space after the word 'emissions.'

The Products numbering list seems to be off, with the list starting at 3.

*Response: Thank you for catching the formatting issues. The work element discussion section was edited to remove any errors, and the numbered list under Products has been corrected.*

### **Office of Regional Planning – Headquarters**

HQ acknowledges FCOG for providing a detailed discussion of objectives, previous work, and products related to each work element.

FCOG also does a good job of detailing how the OWP helps the agency meet federal and state requirements along with the decision-making infrastructure established to meet requirements.

The heading "Transportation Management Area" on the bottom of page 14 is cut off from the information on page 15. Please insert a page break, so the heading is on the same page as the detailed information.

*Response: Fresno COG thanks Caltrans HQ for the acknowledgement. The formatting error has been corrected.*

### **Work Element-Specific Comments**

#### Work Element 170 – Regional Transportation Plan

Several tasks of this work element are focused on the development of the Sustainable Communities Strategy, which is a state mandate. Please identify a non-federal funding source to supplement the tasks of this work element.

*Response: Thank you for your comment. In response we are substituting \$200K in State Planning, Programming and Monitoring (PPM) funding to supplant \$200K in Federal PL funds.*

#### Work Element 911 – Overall Work Program and Budget Development

Please include the closeout of the FY 2022-23 OWP along with the development and approval of the 2024-25 OWP.

*Response: Noted. Thank you for your direction.*

Work Element 111; 154; 166; & 178 – SB 1 Formula

SB1 Sustainable Communities Formula Work Elements: Add a similar statement, as stated in Work Element 177, for the specific grant objectives to Work Elements 111, 154, 166, and 178.

*Responses are listed by work element below:*

WE 111: Regional Transportation Modeling

*Thank you for your comment regarding objective descriptions. The following statement was added to WE 111 on page 32 of the OWP document regarding specific grant objectives:*

*These activities align with the SB 1 Sustainable Communities grant-specific eligible expenses. If implemented, the updated ABM will be applied in the development of the 2026 RTP/SCS and will be used to measure the VMT and GHG reduction from the transportation and land use strategies in the SCS.*

*This study will be funded by SB 1 formula planning dollars (FY22-23) and will expire in June 2025.*

WE 154: Regional Active Transportation Plan Update

*The following Objective replaces the previous paragraph in WE 154 on page 58:*

*This Regional Active Transportation Plan (R-ATP) update will build on the 2018 Fresno County Regional Active Transportation Plan to identify new bicycle and pedestrian projects and programs. This project will help fulfill the RTP/SCS's goals to create pedestrian and bicycling networks that are directly connected to and planned with other transportation modes and to maximize walking and bicycling. The R-ATP will lay the foundation for bicycling and pedestrian networks that link all parts of Fresno County using funding from the Senate Bill 1 Road Maintenance and Rehabilitation Account from the FY 2022-23 Sustainable Communities Formula grant.*

*In addition, staff updated the Discussion section of the element to read as follows:*

*These activities align with the SB 1 Sustainable Communities grant-specific objectives: to encourage local and regional multimodal transportation and land use planning that furthers the region's Regional Transportation Plan (RTP) Sustainable Communities Strategy (SCS); contributes to the State's GHG reduction targets and other State goals, including but not limited to, the goals and best practices cited in the 2022 RTP; addresses disadvantaged communities' needs, increases safety and mobility for non-motorized users, public health, and ultimately advances the active transportation efforts of regional agencies to achieve.*

*Active transportation is an essential part of the Fresno COG transportation system, is low cost, does not emit GHG, can help reduce roadway congestion, and increases residents' health and quality of life. This emphasis signifies an important opportunity to advance SB 375's goals by increasing non-motorized transportation modes, thereby expanding access to a variety of land uses and transit and improving public health and air quality.*

*The 2023 Active Transportation Plan update will pattern's focus on developing and advancing efficient transportation corridors to achieve significant VMT reductions and other benefits from higher walk/bike mode share, more transit use, and shorter auto trips.*

WE 166: Regional Transit Onboard Survey

A brief description of the SB1 grant objectives has been added to Work Element 166: Regional Transit Onboard Survey has been added on page 67 of the document as follows:

*All the project activities align with the SB 1 Sustainable Communities grant-specific objectives: to encourage local and regional multimodal transportation and land use planning that furthers the region's Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS); contributes to the State's GHG reduction targets and other State goals, including but not limited to, the goals and best practices cited in the 2017 RTP Guidelines; addresses disadvantaged communities' needs, and also assists in achieving the Caltrans Mission and Grant Program Overarching Objectives: Sustainability, Preservation, Mobility, Safety, Innovation, Economy, Health, and Social Equity.*

*As intended by the SB 1 planning grant, the project's overall efforts are consistent with the RTP/SCS goals of reducing VMT/GHG and will further climate goals and the other overarching goals in the California Transportation Plan. If implemented, regional transit onboard survey can address transportation needs in disadvantaged and dispersed communities that are either not directly served by or lacking the appropriate services from existing transit services in Fresno County. It will also enhance the multi-modal transportation system in the Fresno region, improve public health, and address the transportation equity issues in the region.*

WE 178: Fresno-Clovis Metropolitan Area Managed Lane Study

The following statement was added to the Discussion section of the work element. These activities align with the SB 1 Sustainable Communities grant-specific objectives: contributes to the State's GHG reduction targets; encourages local and regional transportation and land use planning that furthers the region's Regional Transportation Plan (RTP) Sustainable Communities Strategies (SCS); and also assists in achieving the Caltrans Mission and Grant Program overarching objectives: Sustainability, Preservation, Innovation, and Economy.

**Federal Highway Administration (FHWA) & Federal Transit Administration (FTA)**

General Comments

Draft document incorporates the Federal Planning Emphasis Areas issued in December 2021.

The draft also identifies work elements that are used for BIL Implementation and uses a unique graph to show work elements that support the planning factors.

The document states, "The most recent joint review was conducted in April 2017. On June 28, 2021, FCOG received notification of certification valid for four years." The previous TMA Planning Certification Review occurred in April 2021, not 2017.

*Response: Thank you for your comment. The referenced sentence has been updated to reflect the correct TMA Planning Certification Review date of April 2021.*

## **Work Element-Specific Comments**

### Work Element: 150 Other Modes- Aviation, Rail, Bicycling, Pedestrian

The work element lists FHWA PL BIL 2% as a funding source. It is unclear if this funding is correctly listed or if it is meant to be the 2.5% set-aside for complete streets.

*Response: Yes, this is the complete streets set-aside. All relevant headings in the OWP will be corrected to say FHWA PL CS 2.5%. The \$54,842 programmed in the budget was actually a little more than 2.5% of our total PL apportionment. We will reduce the amount down to 2.5%.*

It is noted that the set-aside for complete streets is meant for complete street-eligible activities as listed in section 11206 of the Bipartisan Infrastructure Law. Aviation planning and rail are not currently listed in this section.

*Response: We will create "Work Element 179 – Complete Streets Planning" and transfer the 2.5% set-aside, along with some other FHWA PL funds, into the new element to develop a local complete streets policy in coordination with guidance to be issued by Caltrans and FHWA.*

It is also noted that non-federal match for the 2.5% complete streets set-aside is waived as of January 5, 2023, memorandum: Waiver of Non-Federal Match for State Planning and Research (SPR) and Metropolitan Planning (PL) Funds in Support of Complete Streets Planning Activities (IIJA/BIL § 11206).

*Response: Noted. All FHWA PL funds except the 2.5% set aside will be matched with toll credits.*

### Work Elements: 163 Freight Movement Planning

Task 163.07 lists, "Assist with monitoring state and federal funding source programs...including the National Highway Freight Program." FTA 5303 makes up over 61% of the WE budget; it is unclear if FCOG plans to flex any NHFP funds to FTA for transit or multimodal projects.

*Response: Thank you for your comment. Presently, we have no plans to apply for NHFP funds that would flex to FTA. Since this is more of a FHWA emphasis area, we have removed the FTA 5303 funds.*

### Work Elements: 165 San Joaquin Valley Household Travel Survey

The work element narrative indicates the project includes FHWA PL funding transferred from the Kings County Associated Governments. However, there is no FHWA PL shown in the budget account tables.

*Response: Fresno COG anticipates the study will be completed by June 30, 2023 with the Kings County funding depleted. However, we have carried over a nominal amount of local funding in case there are issues in the final acceptance.*

### Work Elements: 180 Air Quality Transportation Planning

Work Element Budget lists \$43,536 in FTA 5303, but the Expenditure by Revenue Source spreadsheet (pg. 170) has no FTA 5303 funding. Please clarify.

*Response: Thank you for your comment. A typographical error was made in filling out the Expenditure by Revenue Source spreadsheet resulting in \$43,536 appearing on Work Element 177 instead of Work Element 180. This has been corrected.*