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Priscilla Martinez-Velez
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California Department of Transportation
P.O. Box 942874
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RE: Comments on the RTP Guidelines

Dear Ms. Martinez-Velez:

Over the past two months, ClimatePlan has been an engaged stakeholder in the Regional Transportation Plan (RTP) Guidelines update. We appreciate the partnership between the California Transportation Commission (CTC) and Caltrans to provide meaningful opportunities to provide input on the draft RTP guidelines. While we remain concerned about the fast-moving timeline, particularly for low-income and disadvantaged communities who tend to need more time and resources to fully engage in statewide processes such as this, we also wanted to share our lessons learned based on our work with the regions in their development of the Sustainable Communities Strategies (SCSs).

Since SB 375 was passed in 2008, ClimatePlan has worked at both the state and regional level. With the Air Resources Board, we advocated for strong targets that would help us meet our state climate goals, and realize the myriad of co-benefits such as improved public health and equity outcomes. With the Metropolitan Planning Organizations (MPOs) – and a strong network of advocates – we worked together to ensure that the RTP / SCSs move forward the goals of SB 375 and reflected the needs of the region.

In addition to our on-going work around SB 375, ClimatePlan is in the midst of drafting a report that will share the leading practices from SCSs around the state. This work is being led by consultants, Adam Livingston and Matthew Baker. With this project, the consultants conducted interviews with advocates, state agencies, and MPOs to identify the key strategies in the SCS that are leading the pack, or in other words, implementing SB 375 and creating the shift in land use and transportation to reduce greenhouse gas emissions.

While this report on leading practices in the SCS will not be released until October, we wanted to share our initial findings. These findings are still in draft form and in the process of being reviewed, but we wanted to share them to inform this process. Especially considering the key recommendation from the California Metropolitan Planning Organization Regional Transportation Plan Review Report was, “the CTC

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should include more SCS element-focused best practices in the RTP guidelines.” In line with that recommendation, we believe the leading practices below will improve the guidelines as well as ensure strong implementation of SB 375.

To note –while we believe these leading practices will ensure strong implementation of SB 375 – we also would be remiss if we did not acknowledge that every region will need to do more to fully implement SB 375. We believe the RTP guidelines should urge the regions forward on this goal.

Below, we offer the following recommendations (organized by category) on leading practices from the RTP / SCS to include in the RTP guidelines:

SCENARIO CREATION AND DEVELOPMENT

- 1. The scenario creation process should increase public engagement as a discussion focused on where and how the region should grow. As a result of this, MPOs will be more informed about – and better equipped to meet – the needs of the communities they serve. Specifically, MPOs should:**
 - a. Invite highly engaged stakeholders to create and/or substantially define scenarios.
 - b. Scenarios should represent distinct visions and avoid “tinkering around the edges” in a “goldilocks” (high, medium, low) fashion that minimizes the differences between them.
 - c. Scenarios should not use the same transportation project. Instead, scenarios should tailor growth transportation project lists to one another.
 - d. Data and modeling assumptions should be accessible and transparent to ensure robust public engagement.

- 2. The land use scenarios and transportation investments should be consistent with protecting natural and working lands. Land use patterns that protect resource areas and farmland can help reduce greenhouse gas (GHG) emissions, while providing a range of benefits. Specifically, MPOs should:**
 - a. Incorporate layers representing natural and working lands into scenario mapping, and avoid forecasting new greenfield development (or funding transportation projects to support such development) in these areas.
 - b. Incorporate comprehensive natural resource assessments into scenario development, so land use forecasts are proactively designed to conserve natural and working lands.
 - c. Forecasted growth and transportation investments should be focused on existing communities.

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- 3. The land use scenarios and transportation investments should prioritize the needs of vulnerable populations and underserved communities. The burdens of poor land use planning and lack of mobility are often heaviest in underserved communities. Without proactive effort, these disparities could be easily be overlooked. Specifically MPOs should:**
 - a. Identify the region's needs and transportation gaps for vulnerable populations, low income communities and rural communities.
 - b. Create environmental justice advisory groups to identify disproportionate impacts on vulnerable populations and underserved communities.
 - c. Offer planning grants and planning assistance to help underserved communities submit projects.
 - d. Create incentive and discretionary funding programs to address the needs of underserved communities.
 - e. Consider, and prioritize in scoring, transportation projects and programs that serve third-shift workers (such as late-night bus service), rural residents (such as the successful CalVans example) and other vulnerable populations.
- 4. Land use forecasts and transportation investments should take into account, and help to reduce, the threat of displacement. Displacement increases demand for cheaper housing on the periphery, which leads to longer commutes and higher per capita VMT. Incorporating displacement can help identify options to remedy this. Specifically, MPOs should:**
 - a. In between cycles, anticipate, track, and address displacement in scenario development.
- 5. Land use forecasts and transportation investments actively address and adapt to anticipated climate impacts. Land use scenarios and transportation investments that take the impacts of climate change into account can help ensure the effectiveness of transportation investments as conditions change. Specifically, MPOs should:**
 - a. MPOs should identify vulnerabilities, incorporate anticipated impacts into land use scenarios, and develop siting and design criteria for project selection.

PERFORMANCE TARGETS

- 1. MPOs should adopt a focused list of performance targets to communicate to the public the impacts of the scenarios and how they measure up to the region's important goals. To understand the differences between scenarios, MPOs need clear performance targets that address their communities' well-being. Specifically, MPOs should:**

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- a. Adopt performance targets that are understandable and address important impacts in areas such as public health, equity, and conservation versus focusing on transportation metrics.
- b. Performance targets should be selected with public input.
- c. They should be targets, not measures, and presented as a short list (more detail can be included in appendices).

MODELING

- 1. MPOs should develop transportation models that adequately convey the benefits of compact growth and investments in transit, active transportation, and equitable communities. Models that fully convey the impacts of different scenarios and investments will help MPOs to select the most beneficial projects for their regions. Specifically, MPOs should:**
 - a. Build on existing tools, or develop new tools, to ensure that transportation models adequately convey the relationship between transportation investments and:
 - i. Jobs/housing fit
 - ii. Investment in existing communities
 - iii. Public health
 - iv. Natural and working lands.

TRANSPORTATION

- 1. MPOs should engage in a data-driven process, which includes robust public input, to select the best transportation projects that will reduce greenhouse gas emissions and meet community needs. Specifically, MPOs should:**
 - a. Minimize the number of committed projects that are automatically included.
 - b. Select projects via a transparent scoring process so that the best projects get funded.
 - c. Provide transparent, real-time information about project impacts, costs and phasing during the term of the SCS.
- 2. MPOs should shift funds away from road expansion to transit, active transportation, and other programs that help lower per capita VMT. Historically, funding has prioritized road expansion and highway construction. Now, to meet the needs of the communities they serve, MPOs should prioritize transportation that meets the goals of the SCS process. Specifically, MPOs should:**

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- a. Increase funding for sustainable, equitable communities and transportation choices and move away from devoting the majority of funding to highway construction.
 - b. Find flexibility in highway-heavy sales tax measures to meet statewide health, equity and sustainability goals.
 - c. In future sales tax measures, MPOs should build in investments that support these goals.
 - d. Maximize flexibility: while funding alternatives to driving such as sidewalk construction are important, regions should also fund planning grants to cities, free transit passes to youth, active transportation education, conservation, and more.
- 3. Plan and prioritize investments that support active transportation. Providing transportation alternatives other than driving not only supports public health through increased physical activity and improved air quality, but also helps to reduce per capita VMT and GHG emissions. Specifically, MPOs should:**
- a. RTPs should incorporate Active Transportation Plans, including first- and last-mile strategies.
 - b. Based on these plans, maximize and front-load the proportion of transportation funding that supports walking and biking.

AFFORDABLE HOUSING

- 1. Collaborate with local jurisdictions and affordable housing developments to support implementation of the Regional Housing Needs Allocation (RHNA). Collaborating to implement the RHNA can help to reduce displacement and lower VMT for workers who could not otherwise afford homes near their jobs. Specifically, MPOs should:**
 - a. Track and incentivize RHNA compliance.
 - b. Work with jurisdictions to align local housing elements with the SCS land use pattern.
 - c. Provide direct financial support for transit-oriented affordable housing.

NATURAL AND WORKING LANDS

- 1. Include comprehensive regional mitigation for natural and working lands impacted by transportation projects. A regional advance mitigation planning (RAMP) program can make transportation investments more cost-effective by linking it to science-based, regional conservation priorities. Specifically, MPOs should:**
 - a. Develop a comprehensive natural resource analysis, including: all categories of “resource areas”, all prime farmland, farmland of statewide

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importance, unique farmland and grazing land, resource areas in any local or regional “Greenprint”, and input from leading conservation organizations.

- b. Use this analysis to set priorities for RAMP and require, as a condition of transportation funding and consistency with the SCS, that projects provide mitigation accordingly.
- c. *To note: A comprehensive regional mitigation program does not eliminate the need for underlying transportation investments to support a compact, contiguous and concentric pattern of development.*

RURAL COMMUNITIES

- 1. For rural communities, ensure that transportation planning and investments contribute to mobility, jobs/housing balance and fit, improved health and quality of life, and reduced per capita VMT in rural communities. The effectiveness and legitimacy of the SCS depend upon ensuring that land use and transportation decisions do not exclude these communities.**

Specifically, MPOs should:

- a. Incorporate equitable housing, jobs, and access to services for rural communities in land use scenarios and transportation investments.
- b. Develop low-VMT transportation strategies particular to the rural context and prioritize these for investment.

SCS IMPLEMENTATION

- 1. Use competitive planning grants and technical assistance programs to support implementation at the local level. With the exception of Tahoe, MPOs do not have land use planning authority. But incentives can support implementation of SB 375. Specifically, MPOs should:**

- a. Offer local jurisdictions competitive planning grants with strong eligibility requirements to support SCS implementation.

PUBLIC PARTICIPATION

1. Ensure broad community representation on committees and in the planning of public workshops. Local residents and community organizations must be involved in scenario development and evaluation, and in selection of transportation investments. Specifically, MPOs should:
 - a. Engage residents, community organizations and others from the beginning of the process, with representation on committees and a role in the planning of public workshops. Actively seek representatives from underserved communities and vulnerable populations.
 - b. Where possible, model stakeholder-designed scenarios.

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- c. Use performance targets to track the success of public participation programs, and develop plans to improve these programs in future rounds.
- d. Support resident participation at public workshops by offering childcare, materials in multiple languages, and hold meetings at times where residents can attend (in the evenings, after work, etc.)
- e. Consider offering microgrants to community based organizations to plan outreach events to community residents

In closing, we are still in the midst of collecting – and refining – these leading practices. We offer these recommendations, in draft form, to improve the RTP guidelines and ensure future RTP / SCS successfully implement the goals of SB 375 and help our state meet our ambitious climate goals. As we further refine our leading practices, we will send over an updated copy of these practices to continue to inform the guidelines update.

Thank you for the opportunity to provide input and we look forward to working with you.

Sincerely,

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