



August 5, 2016

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 California Department of Transportation
 P.O. Box 942874
 Sacramento, CA 94274-0001

RE: Comments on the RTP Guidelines

Dear Ms. Martinez-Velez:

Our organizations have appreciated the opportunity to engage in the process to update the California Transportation Commission's (CTC) Guidelines for Regional Transportation Plans (RTPs). We have previously submitted written comments on the process itself (see [RTP Guidelines Stakeholder Group Comment Letter](#)) and also a list of guiding principles to emphasize in this update (see [RTP Guidelines Stakeholder Group Guiding Principles](#)). We now write to share our collective recommendations for strengthening the RTP Guidelines with this update. Many of our organizations will also be submitting separate comments on issues specific to our organizations, but we also wanted to speak with one voice on the following topics:

- [Increase Access and Public Participation to the RTP Process](#) (p. 2)
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Increase Access and Public Participation to the RTP Process (Sec. 4.1 and 4.4)

Public participation is essential to the RTP/SCS process, and the guidelines can provide a strong framework for MPOs to use when conducting public outreach. However, based on our work on RTP/SCSs around the state, additional guidance is warranted to ensure meaningful public participation and access, especially by our most vulnerable populations. Current public participation practices are heavily skewed toward those who have the time and means to attend public meetings or groups like ours who can only serve as intermediaries between government agencies and community residents.

Several of our groups (CPEHN, ClimatePlan, Public Advocates and the Safe Routes to School National Partnership) held three workshops around the state (Oakland, Los Angeles and Fresno) to gather community feedback on the RTP Guidelines. CPEHN will be submitting a separate comment letter with feedback and recommendations that came out of that process. We encourage Caltrans and CTC to incorporate that feedback, especially the recommendations for public participation in RTP processes, as one of the main findings from the workshops is that community members and stakeholders do not feel that RTP public outreach is adequate, or that their needs are adequately sought out, considered and addressed in the RTP.

The Guidelines should identify both what to do and what to avoid in conducting public participation. In addition to the list of items in Section 4.1 (top of p. 100), we also recommend the following be added¹:

- Proactively work with and/or provide financial support to community-based and membership organizations across the region to help engage low-income residents and residents of color in the public process and to jointly plan public workshops or other engagement opportunities. The Fresno COG competitively awarded small amounts (\$1,000 - \$3,000) of competitive funding to such organizations during the development of their 2014 regional transportation plan/sustainable strategy for this purpose and the results were promising.²
- Form an advisory group on Environmental Justice, Social Equity and/or Disadvantaged Communities that includes policy and community-based organizations that are focused on social equity in the region to provide feedback throughout the RTP process.³
- Ensure that community residents have the opportunity to deliberate together to achieve consensus on their most pressing needs and recommendations.
- **Ensure Meetings are Convenient and Accessible:** Hold multiple public meetings at times and locations that allow a diverse range of individuals and organizations, including communities with various family and work schedules, to attend such as meetings in the evening and on the weekends. Consider holding meetings at public facilities such as libraries, community centers, or

¹ Note that many of these recommendations are in the Civil Rights chapter submitted by Public Advocates, posted in the log of applications [here](#).

²The Fresno COG competitively awarded small amounts (\$1,000 - \$3,000) of competitive funding to such organizations during the development of their 2014 regional transportation plan/sustainable strategy for this purpose and the results were promising. Fresno's best practice has long been encouraged by the federal agencies. See FHWA/FTA, Memorandum re: Implementing Title VI Requirements in Metropolitan and Statewide Planning (Oct. 7, 1999), pp. 1-2, available at https://cms.fta.dot.gov/sites/fta.dot.gov/files/docs/Implementing_TitleVI_Requirements.pdf ("Has the metropolitan planning organization (MPO) or State DOT made funds available to local organizations that represent low-income and minority populations to enable their participation in planning processes?").

³ Bay Area social equity groups found that "It was an improvement over past planning cycles [for MTC] to establish the Regional Equity Working Group and to conduct equity analyses at earlier stages before selecting a preferred alternative." In the SCAG region, equity and transportation policy groups worked with SCAG throughout the RTP process to ensure that public outreach included meetings in disadvantaged communities throughout the region, including in the Inland Empire. They also worked with SCAG to identify different types of environmental justice communities impacted by the RTP EJ analysis, including those defined by CalEnviroScreen, SB 535 and the "Communities of Concern" model used in the Bay Area.

neighborhood organizations that people are already familiar with and which are convenient to other destinations they may have to go before or after the meeting. Avoid holding public meetings during the day if feedback from the community is sought. Avoid government office buildings that require photo ID and security to enter. Ensure that interpreters are available when holding meetings in communities with a large population of people with English as a second language or who do not speak English at all. Translate materials, including electronic communications and invitations, to Spanish and other languages where appropriate.

- Technology and the Internet can reach many people, but recognize that not everyone has access to the Internet and an email address and that efforts should be made to reach individuals in other ways. As noted above, community groups should be resourced to conduct outreach. Other strategies for notifying low-income communities of public meetings that should be encouraged include posting flyers in multiple languages as needed, in high-foot traffic areas, schools, and community events, and mailing invitations in multiple languages as needed.
- Provide childcare, food, and other amenities, or resource local community groups to do so.
- Add to the meeting agendas of neighborhood/community based organizations to facilitate a meeting where residents will be available, providing resources to the organization to assist.
- Use meeting locations within access to public transportation, walking and biking routes in addition to parking when selecting a facility. Many times agencies choose locations based on access to parking and busy routes like freeways, which are not as convenient for people who depend on public transportation or other modes. Neighborhood and community based organizations and schools may let you use their meeting space.
- Consider neutral professional facilitation of public meetings to manage conflict and keep the meetings running on time.
- As part of public process materials should be provided ahead of time and draft work product should be shared. In the past, even with special committees to guide the process, organizations were receiving materials right before the meeting and then expected to make decisions on the spot. In some cases, modeling data wasn't shared until it was finalized.
- Public participation should also include ability to access underlying data on populations (household and person files) and travel patterns (trip lists with time and distances of trip segments) to statistically describe the baseline and alternative scenarios by mode and other characteristics. This approach may better address specific questions of the public and complement limited analytic resources of MPOs.⁴

Strengthen Complete Streets and Active Transportation Guidance to Empower MPOs and Incentivize Innovation (Sec. 2.7 Complete Streets, Sec. 6.13 Modal Discussions)

- **Alignment with General Plan Guidelines:** We support the inclusion of the recent update to the General Plan Guidelines, the state's complete streets requirement (AB 1358), and the overview of the benefits of complete streets.
- **Strengthen Complete Streets Guidance:** We support the direction to MPOs to integrate complete streets where feasible (p. 33) that has been incorporated into the current draft Guidelines; however, this neither goes far enough nor recognizes what many MPOs are already doing to advance complete streets. For example, many MPOs have incorporated complete streets principles into their RTP/SCS, while some have even made local compliance with AB 1358 a prerequisite for accessing regional funds. MPOs should be explicitly empowered to encourage increased local compliance with AB 1358, as well as to encourage multimodal transportation investments. Accordingly we recommend revising the language on p. 33 to read "To the maximum extent feasible."
- **Integrate First/Last Mile Considerations:** The current draft Guidelines lack mention of providing first and last mile connections to public transportation. The first and last mile are often overlooked yet fundamentally important to increasing transit mode share and reducing vehicle miles traveled. We recommend the Guidelines include language and guidance on first and last mile connections to transit in the Modal Discussion section, as well as reference emerging examples of such

⁴ Ory D. MTC/ABAG Analytical Modeling Wiki. Technical Data for Scenario 2005_01_XXX (avgload5period.7z). Oakland, CA: Metropolitan Transportation Commission and Association of Bay Area Governments; 2011.

planning around the state.⁵ We have included a list of emerging practices, resources, case studies in Appendix A to this letter.

- **Encourage Regional Funding for Active Transportation:** We recommend the Guidelines include a discussion of how active transportation projects are eligible for a variety of state and federal funding streams that are managed by the MPOs, including the Active Transportation Program, Congestion Mitigation and Air Quality (CMAQ) program, and the Surface Transportation Program (STP). Emerging practices such as the OneBayArea Grant program should be highlighted, as well as including health benefits of projects in grant programs (as the ATP does).
- **Update Best Practices Section:** Many of the resources listed in the active transportation and complete streets sections are several years old, and many new reports and best practices have been created since 2010. We have recommended a series of new reports and case studies in [Appendix A](#).

Provide Guidance on Integrating Public Health Framework for Transportation Planning (Sec. 2.3 and Appendix L)

Section 2.3 on Public Health seriously understates the scientific evidence of how the transportation system impacts health. It needs to be clearly stated that the biggest health impacts of the transportation system are on physical activity and chronic disease reduction.⁶ Transportation-related physical activity, air pollution, and road traffic injuries are inter-related, but, given prevailing levels of air pollution in California, the greatest health gains will be through active transportation accompanied by safety improvements for pedestrians and cyclists.⁷ Specific recommendations for improving Sections 2.3 and Appendix L include:

- **Require Public Health Element in RTPs:** While Appendix L of the draft Guidelines is a good start, we desire to see public health better integrated into the planning process as intended by AB 441 (Chapter 365, Statutes of 2012), Gov. Code 14522.3. At a minimum, we recommend that Section 2.3, Promoting Health, include additional discussion on the links between active transportation and public health, as well as additional language on the co-benefits of investing in transportation projects that reduce greenhouse gas emissions and improve the social determinants of health. This discussion can then be further expanded upon in the narrative and in the case studies in Appendix L. We also strongly recommend that the Guidelines require RTPs to include a Public Health element. This element would include, at a minimum, discussion of physical activity and related health outcomes, air pollution and related health outcomes, and bicycle, pedestrian and motor vehicle injuries and fatalities related to traffic collisions. Additionally the element should include noise, access to essential services and health impacts associated with GHG emissions reductions and other transportation-related impacts on the social determinants of health.
- **Leverage Appendix L to Provide a Public Health Framework for RTP Analysis:** The first draft of Appendix L does not provide any guidance to MPOs on how to integrate a public health approach to transportation planning, decision-making, and investments. Instead, the current Appendix L simply summarizes examples of what MPOs are already doing to promote public health, namely investments in active transportation and Safe Routes to School. This approach misses the opportunity to provide a primer to transportation planners on the social determinants of health and how transportation directly impacts public health and social equity. For example, while transportation planning has historically viewed its role impacting health as limited to air quality and safety impacts, there are a plethora of other situations where transportation directly and indirectly impacts population, including but not limited to: transportation affordability (particularly in terms of accessing employment, health care services, and other critical community destinations) and the limited mobility and disconnected transportation networks created by

⁵ For example, LA Metro recently completed a [First and Last Mile Strategic Plan](#) and identified strategies and potential funding sources for improving the areas surrounding transit stations to make it easier and safer for people to access them. SCAG incorporated some of these strategies into its 2016 RTP/SCS as well as short trips strategies to increase the number of trips under three miles that people take by foot or bike.

⁶ Mueller N, David Rojas-Rueda D, Cole-Hunter T, de Nazelle A, Dons E, Gerike R, et al. Health impact assessment of active transportation: A systematic review. *Preventive Medicine*. 2015;76:103-114.

⁷ Ibid.

highways and freight corridors that physically and psychologically separate communities, impacting social cohesion and connectedness. We recommend Appendix L incorporate a broad discussion of transportation and its impact on public health and a discussion of recommended health-transportation performance indicators⁸ in addition to the current draft's summary of current MPO efforts. Additionally, utilizing the California Health Disadvantaged Index (<http://phasocal.org/ca-hdi/>) as a resource to prioritize targeted funding decisions will have further health benefits in connecting health to transportation investment.

Institutionalize Public Health Review of RTPs

We recommend that in the Consultation & Coordination chapter, the Guidelines require, or at least strongly encourage, coordination and consultation with public health departments in preparing the RTP. Public health departments can provide valuable feedback throughout the process and ensure that public health is integrated throughout the RTP. This has worked well in the Active Transportation Program, where public health departments have been actively engaged in many regions with helping ATP applicants prepare their applications and address the public health questions. Public health departments can also assist with emerging practices, such as comprehensive health impact assessments in scenario modeling, project-level health impact assessment,⁹ and identification of project-level health and climate impacts and health and climate resiliency benefits. The modeling should include, at a minimum, the health impacts associated with air pollution, physical activity related to active transportation, and pedestrian and bicyclist injuries/fatalities. Health outcomes should at a minimum include asthma and other respiratory diseases, cardiovascular disease (including stroke, ischemic heart disease, hypertensive heart disease), diabetes, osteoporosis, lung-colon-and breast cancer, depression, dementia, and obesity. For climate resiliency, consider language on the importance of shading, cool pavements (e.g. bike lanes/walk infrastructure) and shading for bus stops, etc. to foster active transportation even in the face of rising temperatures, as well as drinking water access.

Need for Robust Guidance on Equity, Civil Rights, & Environmental Justice (Sec. 4.2, 4.3 and 4.4)

The current draft Guidelines simply quote from federal civil rights and environmental justice laws and requirements, but provide no meaningful guidance on how to operationalize these requirements. Accordingly, we strongly urge you to include a separate chapter in the Guidelines to provide the space necessary for discussing the federal and state requirements, as well as best practices, relating to civil rights and environmental justice. Many of our organizations have endorsed Principles to Guide the RTP Guidelines update, and we look forward to working with you to integrate the separate Civil Rights chapter submitted by Public Advocates, with additional text as appropriate. We also have the following recommendations:

- **Update RTP Checklist to Meaningfully Screen for Compliance with Title VI & Environmental Justice Laws:** The current RTP checklist contains a single yes/no question for whether a MPO has met its Title VI and Environmental Justice obligations. As these issues are complex and multifaceted, using a single question to capture compliance is not sufficient. The Checklist should have detailed questions on how the needs of low-income and minority households were solicited and considered, as well as how the plan overall works to ensure that low-income and minority households are receiving equal benefits, on an equally timely basis, as other populations. We support the sample language for the Checklist submitted by Public Advocates as a starting point, and have several other suggestions in the [Appendix B](#) to this letter.
- **Address Jobs-Housing Fit, Economic Opportunity and Development.** The Guidelines do not provide much information on how MPOs should address regional jobs and economic

⁸ See MTC's health performance indicators in the 2013 PlanBayArea RTP, as well as the U.S. Dept. of Transportation's Transportation and Health Tool, Available at <https://www.transportation.gov/transportation-health-tool>

⁹ Consider requiring that there is an HIA for any projects over X dollar amount before being added, and that for all projects there be at a minimum a qualitative evaluation of likely health impacts in consultation with local health officials. Also note that MTC uses the HEAT tool to assess health impacts of projects above \$150 million dollars. That's probably too high a dollar threshold esp for a smaller MPO but it does provide a form of HIA and is already in process.

development. While some MPOs do prepare an analysis of jobs-housing fit, jobs generated by transportation projects in the RTP and return on investment of making the RTP/SCS decisions, the Guidelines could provide a clearer framework for MPOs to address economic issues. In our meetings with local stakeholders, we heard loud and clear that economic and workforce issues are very important, and the Guidelines need to address that. RTPs are long-range plans that will take our regions through multiple booms and busts, and they should ensure that the transportation system can handle these cycles and ensure that everyone can access jobs with a reasonable, affordable commute.

- **Prioritize Economic Benefits for Communities of Greatest Need.** The RTP Guidelines can also result in economic benefits to low-income communities and communities of color across California through workforce development opportunities and job creation. Transportation investments have the potential to achieve triple bottom line returns to communities and regions across the state by increasing transportation access while expanding economic opportunity for communities with high levels of unemployment and poverty. Specifically, the RTP Guidelines can and should encourage MPOs to target training and employment opportunities to youth and young adults that need them the most. For example, in the development of an RTP, MPOs should prioritize transportation projects that recruit, train, and/or hire individuals with barriers to employment¹⁰ and that utilize workforce development and hiring strategies that are designed to achieve these outcomes such as:

- Project labor agreements with targeted hire commitments
- Community workforce agreements
- High-road agreements
- Caltrans' Local Labor Hiring Program
- Partnerships with community-based workforce development and job training entities that have a track record of success serving disadvantaged populations and/or have demonstrated a high job placement rate among trainees from disadvantaged communities.
- Partnerships with pre-apprenticeship, state certified community conservation corps, "earn-while-you-learn" models, and/or YouthBuild programs; and/or registered apprenticeship programs that lead to industry recognized credentials, certifications and/or references for the long term unemployed.
- Partnerships with local Workforce Development Board programs serving disadvantaged populations.

This will ultimately boost education and employment outcomes for the state, grow local and regional economies, and support our national transportation objective to create ladders of opportunity as directed by Secretary Foxx through DOT's Local Hire Pilot Program. This also creates greater alignment with the workforce goals of California's Sustainable Freight Action Plan and the Workforce Innovation Opportunity Act state plan administered by the California Workforce Development Board.

Make the Modeling Process More Transparent and Inclusive of Active Transportation, Public Health and Social Equity (Ch. 3)

We echo the comments made by Climate Resolve, Professor Bob Johnston and others on the modeling section of the Draft Guidelines. At a basic level, the models should incorporate non-auto modes of transportation and ensure that the models accurately estimate the impact of shifting more trips from cars to walking, bicycling and transit. The models should also estimate more than just trips from home to work, but also home to school (and work), trips to shopping and other destinations and more complex trip chains. The models should also incorporate equity and environmental metrics — these should not be run in a separate analysis for just the EJ analysis, but should be a core part of the scenario modeling.

¹⁰ As defined by Section 14005 Letter J of the Unemployment Insurance Code:
http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160AB1270

MPOs must provide a clear explanation of the modeling and analytical techniques applied in assessing the implications of the land use scenarios or other alternatives studied. The explanation should include a comprehensive list of assumptions and limitations of the data and modeling techniques. Open source data modeling tools provide the best opportunities for in-depth public participation. Finally, MPOs should analyze and transparently disclose the confidence and error levels associated with forecasted housing growth, as well as the consequences for GHG reduction and other performance measures of achieving less transit-oriented housing growth than their models predict.

Recommendations:

- Identify tools such as Urban Footprint, ITHIM and other innovative models that MPOs are using to model transportation and land use scenarios. They integrate a range of health outcomes that can be helpful in assessing co-benefits of the RTP/SCS.
- Develop and employ best available travel-demand modeling to ensure accurate estimate of travel demand and support better decision-making about land use and transportation projects.
- Include basic economic equity measures in base year and in scenarios, such as distribution of household incomes, rent paid by household by income or by household income group, travel costs by trip purpose by household income group.
- Scenarios should also address impacts on disadvantaged communities. In order to assess impacts on disadvantaged communities it will be necessary for MPOs to identify data sources, survey data, or independently collect data that includes income data, race, ethnicity, and primary language data, as well as other demographic data.
- Community priorities must be included in the model and through off model strategies. In Fresno, Scenario D which came from community priorities did better in terms of GHG reductions and per capita co benefit than the scenario that was ultimately selected.
- Bicycle and walking behaviors are highly gender and age dependent. Many travel demand models are insensitive to demographic characteristics that make walking or cycling more or less likely. Models should explicitly take this into account.
- ¹¹In the mode choice step, walk, bicycle, and drive access to and from transit should be explicitly represented. Calculating the duration of a transit trip should include, walk time, bicycle time, drive time, wait time, and in-vehicle travel time.
- Apply post-processing to adjust model outputs where the models lack capability, or are insensitive to a particular policy or factor. The most commonly referred to Post-processors include a “D’s” post-processor for land use and health impacts models. but Post-processors could be developed for other non-D factors and policies, too.
- The section on calibration and validation is overly focused on motorized modes. This calibration and validation should apply to every mode. If walk and bicycle mode is not included, it may not be easy to identify situations in which mode switching to transit may have an unintended consequence of decreasing active travel. The average trip length by mode and purpose should be validated both in terms of time and distance. In addition trip length frequency distribution by mode should be validated with the observed data. Validation must include walking and bicycling travel, not just motorized modes, and validation documentation for all modes should be made publicly available.
- In the Co-Benefits of SCS section:¹²
 - The language does not acknowledge the availability of validated models available for quantifying the health co-benefits and harms from different transportation strategies.
 - There needs to be a separate health and injury bullet in this section that refers to benefits of physical activity and air pollution reduction and potential injury risks to pedestrians and cyclists.

¹¹ NCHRP 716.16

¹² See for examples: Maizlish N, Woodcock J, Co S, Ostro B, Fairley D, Fanai A. Health co-benefits and transportation-related reductions in greenhouse gas emissions in the San Francisco Bay Area. *Am J Public Health*. 2103;103:703-709; Woodcock J, Giovana M, Morgan A. Health impact modelling of active travel visions for England and Wales using an Integrated Transport and Health Impact Modelling Tool (ITHIM). *Plos One*. 2013;8(1): e51462. doi:10.1371/journal.pone.0051462; Kahlmeier S, Kelly P, Foster C, Götschi T, Cavill N, Dinsdale H, et al. Health economic assessment tools (HEAT) for walking and for cycling. Methodology and user guide, 2014 update. Geneva, Switzerland: World Health Organization; 2014.

- All MPOs should incorporate at least these three health impacts into their scenario assessments and modeling. Models that integrate these three health impacts are more informative than models that look at physical activity, air pollution, and road traffic injuries in isolation. Models that assess only physical activity without consideration of the unintended injury consequences are inadequate and misleading.
- Models that examine health and other co-benefits of SCSs, when possible, should examine differential impacts in disadvantaged populations. Microsimulation is becoming increasingly available and affordable and offers opportunities to leverage exist TDM and ABM output for health and equity analyses.
- MPOs should have an explicit process to assess the quality of the input data used in models and communicate data quality problems of statewide data sources to a central repository. They should also state how they dealt with data quality issues. For example, the California Household Travel Survey 2012 reports sample person 2529635-01 taking a 2,672 mile walk trip. There are many other examples of implausible trips in CHTS 2014. Errors of this magnitude are likely to impact calibration data for MPO models, as well as raise concerns on the integrity of the models. Procedures to impute missing and erroneous data should consider the national guidelines for processing travel surveys.¹³

Incorporate Best Practices from Existing Sustainable Communities Strategies (Sec. 6.22-6.28; Appendix I)

When SB 375 was adopted in 2008, it transformed how regions would plan for land use and transportation by mandating regions to adopt a greenhouse gas emission reduction target. In addition to reducing greenhouse gas emissions, these targets also provide meaningful health and equity co-benefits. In the past eight years, regions have developed visionary plans that include a number of strategies to meet the goals of SB 375 — as well as the state goals, including the Governor’s Executive Order B-30-15, AB 32, and countless others. The RTP guidelines should elevate the best practices from these visionary documents to provide guidance to MPOs so they can meet our state’s ambitious climate goals.

Key best practices that should be included in the RTP guidelines are:

- **Better guidance on scenario development:** MPOs should use the scenario development process to host a discussion with community residents — and interested stakeholders — on how and where the region should grow. As a part of this process, the scenarios should prioritize the needs of the most vulnerable populations and underserved communities. This will ensure that the regional transportation plan is informed by community residents, and is better equipped to meet the needs of the community. Specifically, we recommend:
 - Inviting stakeholders to create and/or define the scenarios
 - Ensure the scenarios represent distinct visions
 - Tailor the transportation project lists for the scenario, versus using the same transportation list for each scenario
 - Ensure data and modeling assumptions are transparent and accessible to the public
 - We recommend reviewing (and potentially including) MTC’s Equity, Environment, and Jobs (EEJ) scenario in 2013 as one way to achieve this recommendation.
- **MPOs use performance targets:** MPOs should adopt a focused list of performance targets to communicate to both policymakers and community residents the impact of various scenarios and how it compares to the region’s goals. This will help members of the public understand the differences between scenarios, and the impact on the region. Specifically, we recommend:
 - Performance targets should be selected with extensive public input
 - There should be a clear distinction between these targets and the performance measures
 - The performance targets should be presented as a short list, understandable, and targeting impacts in topic areas such as public health, equity, and conservation versus transportation metrics

¹³ Stopher PR, Alsnih R, Wilmot CG, Stecher C, Pratt J, Zmud J, et al. Standardized Procedures for Personal Travel Surveys. NCHRP Report 571. Washington, DC: National Highway Cooperative Research Program, Transportation Research Board; 2008.

We recommend reviewing (and potentially including) MTC project performance assessment, which includes performance targets; Fresno COG's focused list of performance measures, as well as SANDAG's Integrated Transportation and Health Impacts Model (ITHIM) as ways to achieve this recommendation.

- **Shift funds away from road expansion to road maintenance, transit operations, active transportation, vanpools, and other programs that lower per capita VMT and meet the goals of SB 375:** Historically transportation funding has prioritized road expansion and highway construction. To achieve the goals of SB 375 — and meet our ambitious climate laws — MPOs will need to prioritize transportation funding for road maintenance, and accelerate investments in transit operations and maintenance, active transportation, and other transportation programs that will reduce VMT.
- **Accounting for GHG emissions in the SCS:** At the center of SB 375 and the joint RTP/SCS is the goal to reduce vehicle miles travelled through more compact and smarter land use and the corresponding transportation mode shift to accommodate that improved land use pattern. These GHG reductions are to be *beyond* that of other GHG reduction mandates and mechanisms in other sectors, and are disproportionately important because of the many co-benefits to ecological and human health that improved land use can provide. However, in the many admirable RTP/SCSs that have been adopted thus far, there has been an extreme lack of illustration in the respective EIRs of where the ultimate projected GHG reductions are coming from exactly — specifically, which GHG reductions can be attributed directly to land use change and VMT reducing strategies vs. non-VMT oriented strategies (for example, increased EV use). Recognizing the complexity involved, guidance is greatly needed for how MPOs can and should be able to better account for what strategies their GHG reductions are associated with to ensure effectiveness of the SCS, in accordance with the goals of SB 375. In terms of reducing greenhouse gas emissions and vehicle miles traveled, the Guidelines should facilitate greater mode shifts to active and public modes of transportation, as well as land use recommendations that promote equitable infill and transit-oriented development for all income levels instead of sprawl.
- **Addressing Housing Needs in the SCS (p. 175):** SB 375 mandated shifts to more concentrated development patterns that reduce sprawl in favor of urban density. However, these shifts are also causing and, in many cases, exacerbating affordable housing and displacement issues by concentrating investment for infill in low income areas that are mostly communities of color. Planning and investment in transportation must explicitly account for, and to the greatest extent possible, seek to avoid or mitigate displacement and lack of affordable housing. Especially since research shows that when existing residents are displaced due to unaffordable housing near transit, GHG emissions increase due to higher income residents — with cars — moving into those spaces. The guidelines should provide greater guidance and assistance on how to address housing needs in each region, especially in light of HUD's new rule on Affirmatively Furthering Fair Housing. We recommend the Guidelines state that land use forecasts and transportation investments should take into account, and help reduce the threat of displacement. Fully incorporating displacement into SCS scenario modeling can help to identify land use and transportation options that could help to address displacement and other disparities. We recommend reviewing (and potentially including) ABAG and MTC displacement analysis as one way to achieve this recommendation.
- **Considering Social Equity in SCS (p. 180):** As mentioned above, we encourage Caltrans and CTC to include additional language on social equity and environmental justice in the Guidelines and to add a separate chapter. We also encourage MPOs to use the public participation process to shape the social equity sections of the RTP and ensure that they adequately address community needs, benefits and burdens.

Encourage Greater Consistency of the RTP with State, County, Local and Other Plans (Sec. 2.6-7)

As noted in Section 2.6, it is “very important that the RTP be consistent with other plans prepared by local, state, federal agencies and Native American Tribal Governments.” The RTP should be a shared vision for the future of each region, and as such it should both align with other plans and encourage

compliance with the RTP. Local accountability and implementation of the RTP/SCS has been a major challenge, as many of us have seen a lack of nexus between the RTP/SCS and local plans and policies. In multi-county regions, the RTP/SCS policies and recommendations for reducing GHG emissions, shifting to alternative transportation and growing more compactly are not always reflected in local and county plans. For instance, ClimatePlan released a report in May entitled "[Toward a Sustainable Future: Is Southern California On Track?](#)" that looked at the implementation of the SCAG RTP/SCS since 2012 and found that the county transportation commissions had not incorporated many of the GHG reduction strategies in their own long-range transportation plans. We respect local control over land use and that many transportation investment decisions are "bottoms up," but we also see a need to hold local and county governments more accountable to the RTP/SCS and share a commitment to reducing GHG emissions and VMT. We will not achieve the State's ambitious climate goals and the mandates of SB 375 if there is no incentive for compliance with RTPs from counties and municipalities that comprise them.

The ClimatePlan report recommends the following four things need to happen to encourage consistency:

- Connect transportation decisions to their impacts on the climate and communities;
- Invest more and sooner in public transit, biking, and walking;
- Convene leaders and get better data to support action;
- Step up: Regional planning is "bottom up," and this means that every county, city, and town must do its part for the region to succeed.

With the new California Transportation Plan 2040, we have a guiding framework for the entire state's transportation investments, and we are encouraged that additional language has been added to the RTP Guidelines referring to that document and its goals and strategies. There are many other plans referenced in the document (and also in the CTP) that show how all of these various plans and processes are aligned, but ultimately, they depend on implementation and we are not seeing it to the level it needs to happen.

We support the recommendations made by Public Advocates in their separate comment letter on consistency. Specifically, the RTP should be consistent with the CTP,¹⁴ local projects & plans,¹⁵ the RHNA¹⁶ and local land use.¹⁷ The new guidelines should, at a minimum, specify standards against which regional and state agencies can assess and ensure consistency in each of these four areas. The Guidelines should also encourage compliance by identifying incentives for local and county planning agencies to align their investments with the RTP/SCS. We support Public Advocates' language suggestions that

MPOs and RTPAs should provide financial incentives to local governments that promote land-use and affordable housing production consistent with the SCS by making a portion of local transportation infrastructure or other funding sources available only to those local governments that (1) adopt an HCD-certified Housing Element and commit to regular reporting and public hearings on implementation, (2) produce a substantial portion of their lower-income RHNA need, and (3) adopt effective tenant protections and other anti-displacement policies to ensure that high-propensity transit riders are not displaced from transit-oriented locations.

MTC's OneBayArea Grant Program (OBAG) has implemented elements of this best practice

¹⁴ 2010 RTP Guidelines, pp. 9-10; see also 23 C.F.R. 450.306 (b)(5) ("The metropolitan transportation planning process . . . [will] promote consistency between transportation improvements and State and local planned growth and economic development.")

¹⁵ Id., p. 19; see also SB 375, Cal. Gov. Code § 65080 (b)(2)(B) ("The sustainable communities strategy shall . . . identify areas within the regional sufficient to house an eight-year projection of the regional housing need for the region [and] identify a transportation network to service the transportation needs of the region.")

¹⁶ 2010 RTP Guidelines, p. 10.

¹⁷ 2010 RTP Guidelines, p. 8. While local jurisdictions retain their land-use powers under SB 375, local land use authority is subject to the Housing Element Law (Gov. Code § 65580 *et seq.*) which requires local governments to accommodate their share of the RHNA at all income levels through changes in their General Plan, zoning and development standards, as needed to make sites available. In addition, federal regulations require that MPOs "confirm the [regional] transportation plan's validity and consistency with current and forecasted transportation and land use conditions and trends" 23 C.F.R. § 450.324 (c) (emphasis added). See also Cal. Gov. Code § 14522.1 (b)(1) ("The [RTP] guidelines shall . . . account for . . . the relationship between land use density and household vehicle ownership and vehicle miles traveled [and] the impact of enhanced transit service levels on household vehicle ownership and vehicle miles traveled.")

approach. As amended in July 2016, OBAG provides a policy framework for awarding federal funding to projects that reflect regional transportation priorities and that support the goals set forth in Plan Bay Area.

There is also no mention of Safeguarding California or guidance issued by State agencies on climate change including the Coastal and Sea Level Rise Guidance; Extreme Heat Guidance. The coordination of climate mitigation and adaptation should be an explicit part of the RTP/SCS planning process. Smart growth in areas impacted by sea level rise will not achieve greenhouse reduction targets. Compact development that exacerbates urban heat island production needs to be considered as well as making transportation infrastructure resilient (e.g. cool pavement, tree shading of sidewalks and bicycling lanes).

Support Inclusion of SB 743 Implementation in the Guidelines

Section 1.4 regarding the "Purpose of the Regional Transportation Plan" includes a new section on changes to transportation analysis required by SB 743 (Steinberg, 2013). We support references to SB 743 here and other places in the Draft Guidelines, even though it is still going through rulemaking. SB 743 is a fundamental tool in the implementation of SB 375 because it removes Level of Service, and thereby congestion from cars, from consideration in environmental review of transportation projects. It replaces LOS with Vehicle Miles Traveled, which tracks closely with greenhouse gas emissions and thus promotes coordination between State climate goals and local implementation of the RTP/SCS. Many of our groups have been engaged in the process to develop the changes to CEQA regulations impacted by SB 743, and have submitted comment letters, including one in [March 2016](#), to support and strengthen the guidelines. SB 743 will help promote active transportation, public health, social equity and infill, and transit-oriented development, which are also goals of the SCS. Thus, we encourage CTC and Caltrans to keep reference to SB 743 in the final RTP Guidelines document.

We also recommend expanding the guidance in Section 1.4 to ensure regional agencies comply with SB 743 in analyzing the VMT impacts of the transportation investments in their RTPs. The Air Resources Board's VISION model, which was used for development of the CTP 2040, demonstrates that statewide VMT cannot exceed roughly a 5 percent increase by 2030, in addition to reasonable fuel and vehicle efficiency improvement predictions, in order for the state to reach the GHG reduction target established in Executive Order B-30-15. Each MPO should develop a VMT reduction target for their RTP based on this statewide maximum allowable VMT increase to ensure that the state will meet its goal across all regions and transportation investments.

Identify Consistent Performance Measures for All MPOs to Use (Sec. 6.18)

In addition to the new federal performance measures, some of which are still going through rulemaking, we encourage Caltrans and CTC to identify performance measures that are consistent with the CTP and SB 375, and that also address social equity, environmental justice, alternative transportation modes, public health and safety. In addition to the list provided in Section 6.18, the Guidelines should also provide sample indicators and recommended baseline measures so that MPOs are consistent with the performance measures they are using and also reporting their progress in the same way. Performance measures can also help to see if the regions are meeting the goals of SB 375 and other policies and strategies identified in the RTP/SCS, and allow MPOs to report on a regular basis to the public on how they are doing.

We also know that some of the federal performance measures will not go far enough, and may even be contrary, to many of the State's climate goals and transportation policy goals. For example, the system performance measures currently in rulemaking focus solely on congestion. Some of our organizations, including the Safe Routes to School National Partnership [submitted comments](#) to encourage a more people-based measure and also to focus on VMT and GHG emission reductions instead of on travel time delay. In the event that the FHWA keeps the performance measures as is, we still encourage Caltrans and CTC to identify measures that will actually meet our goals and be aligned with state policy so that we have adequate measurement of how we are doing.

In addition, the Health in All Policies Task Force developed a list of Healthy Communities Indicators using a healthy communities framework.¹⁸ These should be explicitly referenced in the Performance Measures section or listed as a Best Practice.

Incorporate Conservation of Natural and Working Lands into the RTP Guidelines (multiple sections)

Conservation of natural and working lands can help meet SB 375's stated goal of reducing per capita greenhouse gas (GHG) emissions through "changed land use and improved transportation."¹⁹ A recent study from American Farmland Trust, for example, found that reducing California's rate of farmland conversion by half within a decade "would avoid the emission of a cumulative total of 55 million metric tons of greenhouse gases, equivalent to avoiding emissions from more than 129 billion vehicle miles traveled."²⁰ Other studies have found that per-acre emissions from rangeland are up to 217 times lower than those from urbanized areas;²¹ that more compact patterns of development are likely to support lower per household vehicle miles traveled (VMT) in seven of the eight metropolitan planning organization (MPO) regions of the San Joaquin Valley;²² and that natural landscapes such as oak woodlands can sequester millions of tons of carbon.²³

Natural and working lands provide other benefits as well. Eight percent of the U.S. food supply by value is produced in California's Central Valley,²⁴ and crop receipts alone bring billions of dollars a year into many MPO regions,²⁵ underlining the importance of working landscapes to both food security and job creation. Resource areas and farmland also support groundwater recharge, water treatment and wildlife habitat, make communities more livable, and contribute to public health.²⁶

In order to realize these benefits, we strongly support the recommendations made in the [August 3, 2016 comment letter](#) submitted by The Nature Conservancy (TNC) and Sequoia Riverlands Trust (SRT). These include, but are not limited to, incorporating best practices identified in Sustainable Communities Strategies and Conservation: Results from the First Round and Policy Recommendations for Future Rounds (available at <http://www.southernsierrapartnership.org/scs-policy-report.html>). Like TNC and SRT, we urge you to incorporate this valuable resource into the RTP Guidelines.

Identify the Impacts of Freight Investments on Health Outcomes in Disadvantaged Communities (Sec. 6.11 on Goods Movement, other sections throughout)

We reiterate the comments submitted by the California Clean Freight Coalition (CCFC) on the RTP Guidelines. The Guidelines present a unique opportunity to go beyond the traditional confines of guidance documents and direct comprehensive freight emissions reductions that would generate positive health

¹⁸ The metrics are available here: <https://www.cdph.ca.gov/programs/pages/healthycommunityindicators.aspx>

¹⁹ 2008 Cal. Stat. Ch. 728, § 1(c).

²⁰ Shaffer, S. and Thompson, E. 2015. A New Comparison of Greenhouse Gas Emissions from California Agricultural and Urban Land Uses. Retrieved from <https://4aa2dc132bb150caf1aa-7bb737f4349b47aa42dce777a72d5264.ssl.cf5.rackcdn.com/AFTCrop-UrbanGreenhouseGasReport-February2015,Edited-May2015.pdf>.

²¹ Jackson, L., Haden, Van R., Hollander, A.D., Lee, H., Lubell, M., Mehta, V.K., O'Geen, T., Niles, M., Perlman, J., Purkey, D., Salas, W., Sumner, D., Tomuta, M., Dempsey, M., and Wheeler, S.M. 2012. Adaptation Strategies for Agricultural Sustainability in Yolo County, California. California Energy Commission. Publication number: CEC-500-2012-032. Retrieved from <http://www.energy.ca.gov/2012publications/CEC-500-2012-032/CEC-500-2012-032.pdf>.

²² Niemeier, D., Bai, S., and Handy, S. 2011. The impact of residential growth patterns on vehicle travel and pollutant emissions. The Journal of Transport and Land Use 4(3): 65-80. Retrieved from <https://www.jtlu.org/index.php/jtlu/article/download/226/192>.

²³ Gaman, T. 2008. Oaks 2040: Carbon Resources in California Oak Woodlands. (Tables 1 and 2.) Report for the California Oak Foundation. Retrieved from http://www.forestdata.com/oaks2040_carbon.pdf.

²⁴ U.S. Geological Survey California Water Science Center. 2013. California's Central Valley. Retrieved from <http://ca.water.usgs.gov/projects/central-valley/about-central-valley.html>.

²⁵ California Department of Food and Agriculture. 2015. California Agricultural Production Statistics. Retrieved from <https://www.cdfa.ca.gov/statistics/PDFs/2015Report.pdf>.

²⁶ For spatially explicit mapping of some of these benefits across eight of California's MPO regions, see Thorne, J.H., Roth, N.E., Boynton, R.M., and Woodard, N. 2014. The San Joaquin Valley Greenprint State of the Valley Report. Retrieved from <http://www.fresnocog.org/san-joaquin-valley-greenprint-program>. See also Gies, E. 2006. The Health Benefits of Parks: How Parks Help Keep Americans and Their Communities Fit and Healthy. Retrieved from http://www.lchc.org/wp-content/uploads/01_LCHC_ParksRec.pdf.

outcomes in the communities which would most benefit from improved land use planning and infrastructure investments.

Communities located in the center of trade corridors, near freight facilities, experience heightened risk of a myriad of negative health outcomes. Freight equipment accounts for nearly half of statewide emissions of diesel particulate matter and nitrogen oxides (NOx) as well as compounding to hazardous ozone levels. According to the American Lung Association, inhaling ozone can lead to shortness of breath, chest pain, coughing, wheezing, inflammation of the lungs, asthma attacks, and premature death. Ozone pollution can also cause permanent scarring of the lungs. In addition to these findings, EPA has found a “suggestive” causal relationship between ozone and harm to the central nervous system and reproductive system. Those at greatest risk of suffering from the adverse consequences of breathing ozone include children, the elderly, and individuals with asthma, and people who work or exercise outside.

Detrimental impacts on Air Quality are only a facet of the multiple challenges that should be integral components of guidance provided on goods movement in the Draft Guidelines. Numerous studies clearly demonstrate the strongest correlation between a community and air quality is race, not income. The overwhelming majority of residents living in close proximity to freight hubs are communities of color. The Goods Movement industry and the detrimental air pollution have long been and continue to be significant environmental justice issues.

We advise the Guidelines include all recommendations presented by CCFC as well as the following:

- **Disaggregated analysis of the impacts of Freight:** The sections related to the goods movement should include a comprehensive analysis disaggregated by race, place and income of air quality standards and health impacts in the State’s major freight corridors.
- **Guidance to curb logistics sprawl, particularly in disadvantaged communities:** Land use as it related to goods movement should place particular emphasis on ensuring logistics centers do not increase socio-economic and/or environmental burdens in the State’s Disadvantaged communities. The Guidelines should provide clear criteria, based on socio-economic, health and air quality assessments, that ensure future logistics centers are not placed within or adjacent to over-burdened communities.
- **Guidance for sensitive land use mitigation:** As cited, vulnerable populations are at greater risk from suffering from the detrimental health outcomes related to freight. It would follow that the Guidelines should provide explicit guidance on necessary mitigation measures for sensitive land uses such as schools, hospitals and housing.

Best Practices:

The Community of Mira Loma Village, in Western Riverside County, was situated in close proximity to industrial development, one community survey identified over 800 freight vehicles per hour circulating less than 30 feet from homes. Community Based organizations presented litigation challenging the approval of industrial development by the County of Riverside prior to the City’s incorporation. As a result of the litigation the City of Jurupa Valley’s Environmental Justice (EJ) element was adopted November 6, 2014. The outcomes provided mandatory reductions in disproportionate environmental burdens affecting low-income and minority population. Some examples of enforceable requirements are:

- The City is instituting a mitigation measure by developing a Restricted truck route that will remove 800 trucks an hour off the street less than 30 feet of homes.
- The City participated in the Installation of High Performance Air Filtration systems in homes of the targeted area resulting in a 90% reduction of exposure to diesel pollution.
- All proposals for new sensitive land uses incorporate adequate setbacks, barriers, landscaping or other measures as necessary (such as high performance air filters) to minimize air quality impacts; and are located adequate distances from freeways and major roadways.

Require Greater Transparency in Sequencing of Transportation Projects in the RTP

The Guidelines should ensure that the regional investments and policies that are expected to achieve the mandates of SB 375 are specified clearly and transparently, and are front-loaded in the early years of the

plan. Where actions are assumed to be taken by others, the basis for that assumption should be made clear.

For example, in many Central Valley MPO RTPs, transportation projects were simply rolled over to the financially constrained project list, and scoring criteria and land use patterns were revised to justify those projects. We recommend the Guidelines add language that MPOs should do the opposite: look at land use patterns, adjust scoring criteria and then incorporate the transportation network.

The RTP Guidelines should also state that MPOs transparently list the timing of major investments, so it is clear which are front-loaded. A financial plan that clearly enumerates early horizon projects should be clearly present. This plan should also identify those projects which are 'rolling' over from previous plans.

Provide Greater Guidance for Rural Areas Within MPOs

SB 375, Cap and Trade, and various existing programs and policies offer sophisticated definitions, CEQA incentives and financing instruments for equitable "transit oriented development" in an urban setting. Yet, an equivalent regulatory framework has not been provided for small towns and rural communities where high frequency transit and/or high density development, as defined in an urban setting, may never exist. Much greater guidance and incentives are needed for development of alternative low-VMT land use and transportation strategies specific to a rural setting.

The Guidelines should ensure that growth and transportation investments in rural communities reduce greenhouse gas emissions as well. An RTP/SCS should include policies and programs that direct investments to these communities to plan for growth in ways that improve sustainability and access to jobs and services. We don't want to see GHG reductions - and co-benefits - to more urban areas come at the expense of low income rural communities.

Thank you for the opportunity to comment on the RTP Guidelines update and please let us know if you have any questions as you review this feedback.

Sincerely,

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RTP Guidelines Comment Letter

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Appendix A. Recommended Best Practices, Resources, and Case Studies for Inclusion in Guidelines

In addition to the above, we recommend adding the following documents to the best practices lists in the specified sections:

Best Practices to Add to Complete Streets Section (2.7, p. 33):

- Safe Routes to School National Partnership Complete Streets resources <http://saferoutespartnership.org/state/bestpractices/completestreets>
- The guide [Complete Streets: Making Roads Safe and Accessible for All Users](#) provides information on Complete Streets policies in underserved communities. Produced by the Safe Routes to School National Partnership (2013).
- The National Complete Streets Coalition provides success stories, frequently asked questions, examples, and resources including sample presentations: <http://www.completestreets.org/>
- A Complete Intersections Guide can be downloaded from the Caltrans Pedestrian Safety Resources Website: <http://www.dot.ca.gov/hq/traffops/survey/pedestrian/>
- Accommodating Bicycle and Pedestrian Travel: A Recommended Approach is a policy statement adopted by the United States Department of Transportation. USDOT hopes that public agencies, professional associations, advocacy groups, and others adopt this approach as a way of committing themselves to integrating bicycling and walking into the transportation mainstream: <http://www.fhwa.dot.gov/environment/bikeped/design.htm>
- America Bikes is an umbrella organization that advocates for bicycle funding and policies in the federal transportation bill. Complete streets is a key element of their platform: http://www.americabikes.org/what_are_complete_streets
- The National Complete Streets Coalition shows a map with states and local jurisdictions that have adopted complete streets policies: <http://www.completestreets.org/complete-streets-fundamentals/complete-streets-atlas/>

Best Practices to Add to Transit (or Active Transportation) Modal Discussion (Section 6.12):

- LA Metro, [First and Last Mile Strategic Plan](#), which identified strategies and potential funding sources for improving the areas surrounding transit stations to make it easier and safer for people to access them. SCAG incorporated some of these strategies into its 2016 RTP/SCS as well as short trips strategies to increase the number of trips under three miles that people take by foot or bike.

Best Practices to Add to Active Transportation Model Discussion (Sec. 6.13):

- “At the Intersection of Active Transportation & Equity” by the Safe Routes to School National Partnership (2015): <http://saferoutespartnership.org/resources/report/intersection-active-transportation-equity>
- Any reason letter doesn’t include NACTO guides? “Urban Bikeway Design Guide” (2014), National Association of City Transportation Officials (NACTO)
- “Urban Street Design Guide” (2012?), NACTO, <http://nacto.org/publication/urban-street-design-guide/>
- We also recommend adding additional language to the active transportation section on emerging and evolving policies and initiatives including Safe Routes to School and Vision Zero. Safe Routes to School is highlighted in the Appendix L as one of the public health strategies, but it is also a critical part of complete streets and modal discussions on active transportation and references to it should be included in these sections as well. Vision Zero should also be mentioned as an emerging initiative that many cities are undertaking to reduce traffic deaths from walking, bicycling and driving. While not yet a regional endeavor, it likely will be before the next update to the Guidelines, and is related to performance measures that seek to reduce fatalities and injuries.

Best Practices to Add to Public Health Section (Appendix L):

- American Planning Association, 2016. Health Impact Assessment's Role in Planning, <https://www.planning.org/nationalcenters/health/planninghia/>
- Transportation for America, 2016. Planning for a Healthier Future: <http://t4america.org/2016/06/22/introducing-planning-for-a-healthier-future/>

Best Practices to Add to Modeling Section (Ch. 3):

- Safe Routes to School National Partnership, 2014. Improving Modeling & Data Collection for Active Transportation <https://saferoutescalifornia.files.wordpress.com/2014/06/data-collection-and-modeling-for-active-transportation-06-12-2014-1.pdf>

Best Practices to Add to SCS Section (Sec. 6.22-6.28):

- Livingston, 2016: [Sustainable Communities Strategies and Conservation: Results from the First Round and Policy Recommendations for Future Rounds](#)
- ClimatePlan, 2016. [Toward a Sustainable Future: Is Southern California On Track?](#)

**Appendix B.
RTP Checklist (Sec. 2.10; Appendix C)**

The current RTP Checklist needs to be strengthened to ensure that MPOs are addressing social equity and environmental justice. We recommend adding the following questions to the RTP Checklist (many of these are also in the Civil Rights Chapter submitted by Public Advocates):

New Checklist Questions:

1. Does the public participation plan describe explicit procedures, strategies, and desired outcomes for seeking out and considering the needs of low-income and minority households? (23 C.F.R. § 450.316 (a) (1) (vii).)
2. Was a periodic review conducted of the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process? (23 C.F.R. § 450.316 (a) (1) (x)).
3. Has the MPO monitored and ensured the Title VI compliance of its sub-recipients in connection with the regional planning process and outcomes? (FTA, Title VI Circular, ch. VI, sec. 3.)
4. Has the metropolitan planning organization (MPO) or State DOT made funds available to local organizations that represent low-income and minority populations to enable their participation in planning processes? (FHWA/FTA, Memorandum re: Implementing Title VI Requirements in Metropolitan and Statewide Planning (Oct. 7, 1999), pp. 1-2.)
5. Does the RTP include:
 - a. A description of the procedures by which the needs of low-income and minority populations were identified and considered within the planning process? (23 C.F.R. § 450.316 (a) (1) (vii); FTA, Title VI Circular, ch. VI, §2)
 - b. A description of the specific needs of low-income and minority populations that were identified and considered within the planning process? (23 C.F.R. § 450.316 (a) (1) (vii); FTA, Title VI Circular, ch. VI, §2)
 - c. A description of which of those identified needs the RTP will address? (23 C.F.R. § 450.316 (a) (1) (vii); FTA, Title VI Circular, ch. VI, §2)
 - d. A description of the specific investments and actions that will be implemented during the first four years of the planning period to address the needs identified and prioritized? (U.S. Department of Transportation, Updated Environmental Justice Order 5610.2(a) (amended 5/2/2012), pp. 14-15, App. sec. 1 (f); Federal Transit Administration Circular 4703.1, "Environmental Justice Policy Guidance for Federal Transit Administration Recipients" (Aug. 15, 2012), p. 2.)
 - e. Racial and ethnic data showing the extent to which members of minority groups are beneficiaries of programs receiving Federal financial assistance? (49 CFR Section 21.9(b))
6. Has a Title VI analysis been completed that accounts for the race and ethnicity?

7. Has an Environmental Justice analysis been completed that accounts for race and ethnicity and that accounts for the timely receipt of a fair share of the benefits of the RTP and its investments by minority populations and communities during the first four years of the plan?
8. Does the RTP ensure that low-income and minority populations are protected from the impacts of displacement and segregation? (49 CFR Section 21.5 (b) (1)); U.S. Department of Transportation, Updated Environmental Justice Order 5610.2(a) (amended 5/2/2012), pp. 14-15, App. sec. 1 (f)).
9. Will low-income populations and minority populations receive a fair and timely share of the benefits of the RTP and its investments? (U.S. Department of Transportation, Updated Environmental Justice Order 5610.2(a) (amended 5/2/2012); Federal Transit Administration Circular 4703.1, "Environmental Justice Policy Guidance for Federal Transit Administration Recipients" (Aug. 15, 2012), p. 2.)
10. Will low-income populations and minority populations be protected against an unfair share of the burdens of the RTP and its investments? (U.S. Department of Transportation, Updated Environmental Justice Order 5610.2(a) (amended 5/2/2012); Federal Transit Administration Circular 4703.1, "Environmental Justice Policy Guidance for Federal Transit Administration Recipients" (Aug. 15, 2012), p. 2.)

We also recommend additional questions on:

- Public Health: There should be a question about whether the RTP contains public health information, in accordance with AB 441. It should also ask whether the RTP consulted with public health departments. For example:
 - Has the RTP been developed with timely input from local health officials?
 - Has the RTP development incorporated results of comprehensive health analysis of scenario alternatives
 - Has a specific health and equity scenario been developed and included in scenario modeling?
 - Does the RTP provide an assessment of the health impacts of all major projects included?
- Housing: In 4b, add language around displacement and gentrification, and whether or not the MPO considered both issues in preparing the SCS?