



August 5, 2016

Priscilla Martinez-Velez
Division of Transportation Planning, MS-32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001

RE: Comments on the RTP Guidelines

Dear Ms. Martinez-Velez:

The American Cancer Society Cancer Action Network (ACS CAN) commends the California Transportation Commission (CTC) for its efforts to promote the consideration of public health and equity in transportation planning and decision-making throughout California. ACS CAN greatly appreciates CTC's inclusion of health promoting concepts and language in its draft Guidelines for Regional Transportation Plans as well as the opportunity for public health stakeholders to provide comments on these guidelines, particularly as they relate to the promotion of active transportation, which is of paramount importance to cancer risk reduction efforts in California. The Guidelines point out that transportation decisions can lower rates of obesity, hypertension, and other chronic diseases (Section 2.3). Prominent among those chronic diseases is cancer, the second-leading cause of death in California.¹

Physical inactivity, poor diet, and excess weight are second only to tobacco use as risk factors for preventable cancer. These modifiable risk factors are responsible for approximately 20 percent of cancer cases.² Achieving and maintaining a healthy weight and being physically active throughout life are among the best ways to reduce the chances of developing and dying from cancer. There is a strong link between being obese and increased risk of developing cancers of the breast in postmenopausal women, colon and rectum, endometrium, kidney and adenocarcinoma of the esophagus, and pancreas. Excess weight may also be associated with risk for cancers of the liver, cervix, and ovary, and non-Hodgkin lymphoma, multiple myeloma, and aggressive prostate cancer.³ Among cancer survivors, obesity is linked to an increased risk of cancer recurrence, decreased quality of life, and a lower chance of survival for many cancers.^{4,5} In addition to its effects on body weight, research shows that physical activity may independently reduce the risk of cancers of the breast, colon, and endometrium, as well as advanced prostate cancer, and possibly, pancreatic cancer.⁶ Disparities in physical activity, obesity, and socioeconomic conditions can result in important disparities in cancer risk and survival. For children, increasing daily physical activity and improving rates of walking to school can help to reverse the alarming nationwide trend toward increased childhood obesity and inactivity.⁷

Additionally, the financial benefits of active transportation, biking and walking are notable. A single mile of a four-lane urban highway costs at least \$20 to \$80 million to build while over the width of one traffic lane, bicycling and walking can move five to 10 times more people than driving. In general investment in bicycling and walking facilities costs significantly less than car-centric infrastructure.^{8,9,10}



Given the important roles active transportation and transit can play in promoting physical activity and reducing the risk of obesity and ultimately cancer, ACS CAN strongly supports the continued strengthening of the Guidelines for Regional Transportation Plans to include recommendations for and content supporting policies and practices that promote walking, biking, and the use of public transit as well as the enhanced integration of public health considerations in transportation planning. The guidelines should also strive to reduce harmful air and climate pollutants, while providing greater opportunities to improve community health through active transportation.

Specifically, ACS CAN sees a number of opportunities to further augment the potential for the Guidelines to promote health.

- Strengthen promotion of the presence and participation of public health stakeholders in regional transportation conversations, particularly in Sections 4.1 on “Consultation and Coordination” and 4.4 on “Participation Plans.” The Guidelines should require, or at least strongly recommend, engagement with public health departments and public health non-governmental organizations to enhance the potential of Regional Transportation Plans (RTP) to promote community health.
- Include public health metrics and indicators, such as obesity and physical activity prevalence, amongst those Metropolitan Planning Organizations (MPOs) consider to assess RTP performance. Also include measures of active transportation and transit-related access disparities.
- Include in Section 2.7 and 6.13 on Active Transportation, Safe Routes to School, a public health strategy connecting communities to schools, that includes but is not limited to child safety, reducing traffic congestion, sidewalks, crosswalks and bike lanes. Efforts like Safe Routes to School should be included in discussions on complete streets and active transportation. Also, include additional language about the state Active Transportation Program (ATP). Adequate funding is needed to promote more walkable and bikeable communities, and ATP is the primary source of funding for walking and bicycling in the state.
- Include local public health plans, such as the Community Health Improvement Plans required under public health department accreditation, among the locally prepared documents considered in Section 2.6, “Consistency with Other Planning Documents.” These plans almost always include content on local collaborative efforts to address obesity and promote physical activity.
- Throughout Chapter 3, “Regional Transportation Plan Analysis and Modeling,” integrate public health and equity impacts into scenario modeling and enhance incorporation of active transportation variables into models, as exemplified by the Integrated Transport and Health Impact Modelling (ITHIM) tool.



- Enhance Appendix L to include or augment examples of the health promoting approaches below. Integrate these health promoting concepts into the RTP Checklist (Section 2.10, Appendix C).
 - Improving connectivity between regional transit modes and active transportation infrastructure.
 - Improving the regional, inter-city connectivity of complete street networks and active transportation infrastructures, particularly bikeways.
 - Improving the completeness of neighborhoods, particularly those around regional and local transit modes and active transportation infrastructure, through various means, such as zoning or incentives. Neighborhood completeness is enhanced when key community assets, institutions, resources, and services are located in or near neighborhoods, which increases opportunities for trips taken by active transportation.

- Enhance discussions of equity, perhaps through an equity dedicated chapter, to include content on the following topics. Integrate the equity topics below into the RTP Checklist (Section 2.10, Appendix C).
 - Environmental justice
 - Ensuring active transportation, transit, and other transportation investments are coupled or coordinated with anti-displacement policies and protections that stabilize housing market conditions for vulnerable residents.
 - The systematic consideration of disadvantaged communities and public health disparities in the prioritization of transportation investments.
 - The potential for strategically implemented regional transportation policies to support economic empowerment in vulnerable communities, such as through the prioritization of transit and active transportation infrastructure that connects such communities to job opportunities or through local hiring practices for transportation projects in vulnerable communities.

- ACS CAN enthusiastically supports efforts to promote public participation in RTPs as described in Chapter 4, “RTP Consultation and Coordination,” including those required under Title 23 CFR (Code of Federal Regulations) part 450.316, such as the use of convenient meeting times, convenient locations, and language access. Such approaches could be enhanced by including Guideline recommendations that promote language-appropriate outreach to vulnerable communities, expand public comment periods beyond the 45-day minimum, and call for the formation of a community-focused equity and environmental justice advisory group to provide early and ongoing visioning and input.



- Finally, the RTPs should closely align with the state’s Sustainable Freight Action Plan guiding principles to ensure that cleaner air and reduction in carcinogenic diesel emissions from the freight sector are considered. Diesel exhaust from the freight sector is responsible for approximately \$20 billion in health damages annually in California.¹¹ Communities must be better protected from local pollution from the freight sector.

Again, the American Cancer Society Cancer Action Network appreciates the opportunity to provide comment on the California Transportation Commission’s draft Guidelines for Regional Transportation Plans and commends CTC for its insightful promotion of health and equity, which ultimately result in cancer risk reduction.

Sincerely,

James K. Knox
Vice President
Government Relations

¹American Cancer Society, California Department of Public Health, California Cancer Registry. *California Cancer Facts & Figures 2016*. Oakland, CA: American Cancer Society, Inc., California Division; 2016. pg 1.

²World Cancer Research Fund International. *Cancer preventability estimates for diet, nutrition, body fatness, and physical activity*. London: World Cancer Research Fund International; 2015. Available at <http://www.wcrf.org/int/cancer-facts-figures/preventability-estimates/cancer-preventability-estimates-diet-nutrition>.

³Kushi L, Doyle C, McCullough M, et al, and the American Cancer Society 2010 Nutrition and Physical Activity Guidelines Advisory Committee. American Cancer Society Guidelines on Nutrition and Physical Activity for Cancer Prevention. *CA Cancer J Clin* 2012; 62:30-67.

⁴Ibid.

⁵Rock C, Doyle C, and Demark-Wahnefried W. Nutrition and Physical Activity Guidelines for Cancer Survivors. *CA Cancer J Clin* 2012; 62:242-274.

⁶Kushi et al, 2012.

⁷Safe Routes to School National Partnership. “Safe Routes to School 101.” Available at <http://saferoutespartnership.org/healthy-communities/101/about>. Accessed August 2, 2016.

⁸City of Portland Office of the Auditor. *Service Effort and Accomplishments Report 2006-07*, Portland, OR: City of Portland; 2007.

⁹Dekoster J, et al. *Cycling: The Way Ahead for Towns and Cities*. Luxembourg, Belgium: European Commission; 1999.

¹⁰Kriszek K, et al. *Guidelines for Analysis of Investments in Bicycle Facilities*. Washington, DC: Transportation Research Board; 2006.

¹¹California Sustainable Freight Action Plan July 2016. Available at http://www.casustainablefreight.org/files/managed/Document/286/CSFAP_AppendixG_FINAL_07272016.pdf.