



Office of Sustainability

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-sent by email

Dear Ms. Martinez-Velez:

Thank you for the opportunity to participate in the RTP Guideline update process and provide these comments. I know that others will be submitting a larger organizational sign-on letter that address the below comments in more detail. I appreciate you considering these comments and taking necessary action to address them.

1. **Increase Access and Public Participation to the RTP Process.** I encourage Caltrans and CTC to incorporate public feedback, especially the recommendations for public participation in RTP processes. Given the very short outreach, comment and adoption schedule adequate community member and stakeholder engagement, with meaningful inclusion cannot and is not occurring. I ask that the schedule be lengthened and adjusted to accommodate an intentional and inclusive process.
2. **Strengthen Complete Streets and Active Transportation Guidance to Empower MPOs and Incentivize Innovation.** MPOs should be explicitly empowered to encourage increased local compliance with AB 1358(Complete Street Act), as well as to encourage multimodal transportation investments, particularly in disadvantaged communities with higher health and income disparities.
3. **Integrate First/Last Mile Considerations.** I recommend the Guidelines include language and guidance on first and last mile connections to transit.
4. **Encourage Regional Funding for Active Transportation & Support Health:** I 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 including health benefits of projects should be included in all grant programs, and specifically award points to engaging with the local health department in responding to the questions and documenting the results of that contact (as what will occur in the 2017 Active Transportation program scoring rubrics).
5. **Provide Guidance on Integrating Public Health Framework for Transportation Planning.** 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. 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. I 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, provide for climate resiliency 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. I 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 and climate 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.

6. **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. I recommend Appendix L incorporate a broad discussion of transportation and its impact on public health and a discussion of recommended health-transportation performance indicators in addition to the current draft's summary of current MPO efforts. Additionally, utilizing the California Health Disadvantage 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.
7. **Institutionalize Public Health Review of RTPs and Provide Funding for Health Participation.** I 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. Given the significant lack of funding Public Health (state and locally) receives, new funding for their participation is essential for their inclusion and participation to occur in a productive way.
8. **Make the Modeling Process More Transparent and Inclusive of Active Transportation, Public Health and Social Equity.** 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. Utilize and provide funding to utilize tools such as Urban Footprint, ITHIM and other innovative models that to model transportation and land use scenarios for improved health outcome decision-making. They integrate a range of health outcomes that can be helpful in assessing co-benefits of the RTP/SCS. Funding needs to accompany these tools to cover the costs of populating all the data points needed to utilize these tools.
9. **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.**
10. **Encourage Greater Consistency of the RTP with State, County, Local and Other Plans.** 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.

11. **Provide Greater Guidance for Rural Areas Within MPOs.** 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. Please let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Judy Robinson".

Judy Robinson
Sustainability Manager