

Draft 2016 Regional Transportation Plan Guidelines Comment Form

Thank you for reviewing the Draft 2016 Regional Transportation Plan Guidelines document. Listed below are directions for submitting your input, ideas and comments specific to the Draft 2016 Regional Transportation Plan Guidelines document. The public comment period for this document begins Wednesday, July 6, 2016 and ends Friday, August 5, 2016, 5:00 PM PST.

Directions for submitting comments:

1. Fill out your contact information (type preferred)
2. Fill out your comments individually, providing as much detail as possible (type preferred). Please reference chapter and page numbers.
3. Submit your comments via:
 - a. E-mail: RTP.Guidelines.Update@dot.ca.gov
 - b. U.S. Mail:
Priscilla Martinez-Velez
Division of Transportation Planning, MS-32
California Department of Transportation
P.O. Box 942874
Sacramento, CA 94274-0001
 - c. Fax: (916) 653-0001
Attn: Priscilla Martinez-Velez
 - d. In person: 1120 N Street, Sacramento, CA
Attn: Priscilla Martinez-Velez - Division of Transportation Planning MS-32

Contact Information

We ask for your information so that we can contact you for clarification, if needed.

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**Draft 2016 Regional Transportation Plan Guidelines
Comment Form**

Comment

Please provide as much detail to your comment as possible (attach multiple pages if necessary).

Chapter: _____ Page: _____

Begin here:
(comment letter attached)

A large empty rectangular box with a black border, intended for the user to provide their comment. The text "Begin here: (comment letter attached)" is located at the top left corner of this box.



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:

We are writing to provide comments and recommendations on the California Transportation Commission's (CTC) update to the California Metropolitan Planning Organization Regional Transportation Plan Guidelines. Through our comments, we aim to assist you in developing Final Guidelines that incorporate fair and just policies that benefit all communities, especially those in rural areas. We appreciate this opportunity and look forward to continuing to work with CTC on this process.

Modeling

With expected increases in population growth in the San Joaquin Valley, we must engage in smart growth planning that will mitigate that growth. We need to ensure that existing disadvantaged communities are not bearing the burden of this growth but are reaping the benefits. Community priorities, therefore, must be included when modeling for future growth patterns and developing growth scenarios. For example, during Fresno County's 2014 RTP modeling process, Scenario D reduced growth from proposed new town development and foothill communities and reallocated higher-density growth to existing cities and disadvantaged communities. Scenario D resulted in equal and greater greenhouse gas emission reductions, higher active transportation and transit usage, and decreased vehicle-miles traveled than the scenario that was ultimately selected.

While this scenario was not selected for the county's RTP, it proves that equitable investment in existing communities over new communities produces social, economic and environmental benefits that SB 375 is intending to achieve. The RTP Guidelines should include language that directs MPOs to proactively work with community based organizations and community leaders to incorporate community priorities into scenarios for modeling. Additionally, we recommend language that directs MPOs to work together with

community leaders to identify infill opportunities in existing communities - particularly in low income communities - and utilize the information to create alternative scenarios that when supported with adequate and sustainable transportation networks will result in greenhouse gas emission reductions and associated co-benefits.

Improving Public Participation

Meaningful public participation is essential for the development of robust and equitable RTPs. As organizations that work to engage communities in decision making processes related to the built environment we would like to emphasize the value of authentic community engagement through each stage of RTP/SCS development. We offer the following recommendations to be included in the guidelines:

- Provide all materials related to the update with adequate time for public review and input.
- Provide early and ongoing drafts for public review to ensure transparency. Based on our experience, MPOs have been reluctant to release draft products of scenario development, documentation related to housing and employment growth allocations and transportation investments and thus leaving limited time for public review and input.
- Hold all meetings at accessible locations, provide interpretation in all necessary languages and translate all materials. We recommend all MPOs employ Fresno Council of Governments strategy of providing funds to local community based organizations to support authentic community engagement.
- We recommend including Fresno Council of Governments recently adopted 2018 RTP/SCS Public Participation Plan as a best practice.
- All MPOs should strive to meaningfully respond to every comment submitted at public workshops so that members of the public are aware of how their comments were meaningfully included throughout the decision making process.

Ensuring Co-Benefits in Rural Areas Within MPOs

In the previous round of RTP adoption processes, we saw very little housing and employment growth as well as transportation investments allocated to low income, rural communities. Strategies to reduce greenhouse gas emissions must go beyond urban centers to ensure that all residents benefit from resources but also see reduction in pollution in their communities. When transportation related investments were included in the Plans, they were not placed in the communities that need them the most. The RTP Guidelines must include language that requires MPOs to include policies and programs that direct investment to lower income rural communities first to avoid greenhouse gas reductions and co-benefits from only occurring in urban areas at the expense of the rural communities who need it the most.

Sequencing of Plan Development

To truly develop authentic RTPs, MPOs should work diligently to ensure that each component of the plan is developed through appropriate processes. Based on our engagement in the 2014 RTP/SCS plans in the San Joaquin Valley, many of the MPOs simply rolled over projects from the previous plan's financially constrained project list and then adjusted land use patterns to fit those transportation investments. This results in land use practices that are not well-integrated with transportation networks and do not improve conditions in existing disadvantaged communities. The language in the Draft (Section 3.3, pg. 49)

currently provides this recommendation on the MPOs modeling of transportation and land use projects: “Consider developing land use models that are sensitive to transportation scenarios so the effects of land use and transportation policies can interact with feedback in an integrated transportation model.” This could be made stronger by clearly listing the order in which the model should be developed; the final RTP Guidelines needs to ensure that land use patterns are studied *before* scoring criteria is adjusted and transportation network incorporated. We recommend that CTC include language in the guidelines that direct MPOs to first work with communities to develop land use scenarios, review and adjust scoring criteria to be consistent with state planning priorities and climate goals, review transportation projects in the list to determine consistency with adjusted scoring criteria and then develop alternative transportation investment scenarios for each land use scenario alternative.

Ensure Transportation Investments Reflect State Planning Priorities and Climate Goals

As we discuss above MPOs must ensure that transportation investments are equitable and truly support shifts in travel modes, further state planning priorities and are consistent with state’s climate goals. We recommend CTC include language in guidelines that direct MPOs to adjust scoring criteria to support projects that both reduce greenhouse gases and maximize social, economic and environmental benefits; review and analyze transportation projects to ensure consistency with revised scoring criteria; and develop alternative transportation scenario investments for modeling.

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Thank you for your consideration of these comments. Should you have any questions, please contact Nikita Daryanani at (559) 369-2790 or ndaryanani@leadershipcounsel.org.

Sincerely,



Nikita Daryanani
Policy Coordinator, Leadership Counsel for Justice and Accountability

Nayamin Martinez, MPH
Director, Central California Environmental Justice Network

Kevin D. Hamilton, RRT
Chief Executive Officer, Central California Asthma Collaborative