

Jennifer Soliz  
Fresno Council of Governments

June 26, 2017 (modified from letter sent May 19, 2017)

**Re: Comments on Fresno COG 2018 Draft RTP Policy Element**

Dear Ms. Soliz,

Thank you for the opportunity to provide comments on the Draft 2018 RTP Policy Element Outline (“Draft Outline”). Through our comments, we, the undersigned organizations, seek to ensure that the RTP is guided by policies that create sustainable, equitable and effective transportation options that directly benefit all of Fresno County’s residents, regardless of race, socioeconomic status, language, or place.

We commend staff for incorporating several changes to the Outline based on comments received at the RTP Roundtable meeting on March 22<sup>nd</sup>, 2017, including one change suggested by Leadership Counsel to separate out “environmental sustainability” and “public health” in the Values section of the Outline. We also commend staff’s strengthening of the environmental justice goal under section 5.1, General Transportation Goals. At the March 22<sup>nd</sup> meeting, staff stated that there would be plenty of opportunities in the following months for public input on the document, and we look forward to working with Fresno COG staff on the evolution of the document.

Our comments here are informed and motivated by our work directly with low-income communities of color in Fresno County. We work to ensure that these communities receive the benefits of equitable investment and development so they can enjoy healthy and safe places to live. This perspective shapes how we approach regional transportation planning in Fresno County, since many of the communities with whom we work do not have adequate access to transportation infrastructure such as safe roads, sidewalks, or critical public transit alternatives. Therefore, our policy advocacy work on these issues seeks to direct funds, development, and services to these areas that have historically not received their fair share of these benefits.

Low-income communities and communities of color, particularly in unincorporated areas, could gain enormous strides in health and safety if the FCOG were to prioritize projects that benefit these communities. Families living in these communities are often not able to walk between houses or to bus stops, schools or stores safely; have little to no biking infrastructure; and have inefficient public transit options, or no transit options at all. Increased transportation investment in these areas would mean the ability to walk, drive and bike safely within communities; safe places to walk and exercise; and increased access to critical medical facilities and services in urban centers. Additionally, investing in public transit and environmentally friendly transportation infrastructure in these communities would decrease harmful emissions within these environmentally vulnerable communities and include these communities in regional solutions to decreasing greenhouse gas emissions and fighting climate change.

With that perspective in mind, we recommend the following changes to the Policy Element Outline for the 2018 RTP:

**1. Highlight Transportation Equity, Public Health, Housing and Natural Resource Protection in the Vision Section**

The Outline’s Vision section focuses on the maintenance of existing infrastructure and sound finances and only briefly mentions “land use and air quality impacts.” As drafted, the Vision Section fails to acknowledge key social and environmental goals identified as priorities by residents, local jurisdictions, community groups and other stakeholders during FCOG’s extensive public outreach process for this update. FCOG must modify this section to accurately reflect these priorities. In particular, the Vision should include the following priorities identified by stakeholders as critical for the region:

- public health<sup>1</sup>
- transportation equity (defined as: ensuring access to effective transportation options, regardless of race, income, location, nationality, primary language, sex, gender, culture, religion, or any other factor, so that all residents have access to opportunities, resources and services.)
- access to places of employment and affordable homes
- protection of habitat, agricultural land and other natural resources for future and current generations

**2. Include Equitable Transportation Investments and Other Public Priorities in the Values Section**

FCOG must modify the Outline’s Values section (part 4) to reflect the values expressed by the public and the RTP Roundtable in the 2018 RTP/SCS Update process. We understand that the values included in the Outline are taken from the 2014 RTP/SCS and appreciate that staff are in the process of revising these values. Accordingly, we propose the following changes to this section:

- Provide definitions and detail for the concepts expressed as values. As drafted, several of the meanings of several of the concepts included are vague and do not provide clear direction to guide policy and program development (e.g., “positive image,” “aesthetic values,” “housing choices”). Housing choices, for example, does not describe whether it addresses size and location of housing, or accessibility of a range of housing for all income levels. The section should make clear that access to affordable housing for residents of all income levels is a core value of the RTP/SCS.
- Include Transportation Equity as a core value. Leadership Counsel and other stakeholders have mentioned this value extensively during the RTP Roundtable meetings. Transportation Equity is of critical importance to the communities with whom we work. This concept could be incorporated into the values by rewording the value “All People Have Worth (Social

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<sup>1</sup> The Vision must identify public health as an explicit priority for the RTP/SCS to advance through the full range of its policies and programs.

Equity)” to say “All People Have The Right to Adequate and Effective Transportation Options to Access All Available Opportunities (Social and Transportation Equity).”

### **3. Change transportation goals, objectives and policies to include more references to the importance of equitable transportation investment**

Additionally, the order of the policies listed under the first goal under section 5.1 (“An efficient, safe integrated, multimodal transportation system”) must be changed to show that Fresno County is focusing on the regional transportation network primarily as a mechanism for increasing health and vitality of its residents, and secondarily on the regional transportation network’s function as a means of commerce. As currently listed, the second and third goals focus on freight, and the fourth goal focuses participation in transportation planning by private and government entities. The second and first two goals should be moved to the end of the list, and the fourth goal should include an explicit reference to public participation, in order for this list of goals to show a focus on resident’ needs rather than prioritization of commercial interests.

In order to further emphasize transportation equity goals, the second goal under section 5.1 (“Improved mobility and accessibility for all [...]”) should be modified as follows:

**Goal: Ensure equitable access to effective transportation options for all, regardless of race, income, national origin, age, location, physical ability, or any other factor, with a focus on benefitting the region’s most vulnerable populations.**

Objective: To have the principle of transportation equity guide transportation planning and implementation decisions in the region.

Policies:

- Ensure planning for projects that benefit disadvantaged communities and vulnerable groups is transparent and actively engages affected communities.
- Prioritize projects that benefit disadvantaged communities through project evaluation criteria, scoring criteria, and other decision-making processes
- Set aside 30% of funds for disadvantaged communities
- Direct a percentage of planning funds towards planning for projects in disadvantaged communities, through the Healthy and Livable Communities Grant program
- Provide technical assistance to disadvantaged communities to develop competitive applications for ATP and other funding
- Identify transportation needs in disadvantaged communities through meaningful engagement in decision-making about project design and project implementation
  - Host at least two meetings with community residents being benefitted by project to solicit input on project design
    - Host these meetings at times accessible for all residents, given their work and family schedules

- Host meetings within the benefited disadvantaged community in venues that are accessible for all residents, given the location of their homes, connection to public transit, and physical disabilities.
  - At these meetings, provide food, child care, and effective interpretation services
- An additional two meetings should be held once the draft plan is completed but prior to final approval.
  - Gather information regarding concerns with implementation or construction plans and what safeguards are needed to ensure least disruption to residents lives.
  - Gain resident support for the plan, discuss next steps and timeline.
- Ensure implementation of residents' input as the primary force shaping project design and implementation.
- Include representatives of disadvantaged communities on advisory committees and in decision-making spaces whenever possible.
- Develop innovative solutions to suit needs of disadvantaged communities and vulnerable groups
- Align scoring criteria to support investment in transportation infrastructure in disadvantaged communities and for vulnerable groups
- Enhance all residents' access to areas of opportunity (jobs, education, etc), healthy food, clinics and hospitals, regardless of race, income, national origin, age, location, physical ability, or any other factor
- Create or enhance areas where residents can safely exercise and move around their community
- Connect residents to activity centers like green spaces and community centers
- Enhance access to affordable housing options connected to transit (SCS obligations regarding affordable housing)
- Ensure health and safe routes for children to schools and between activity centers
- Ensure accessible and effective transportation options for seniors and persons with physical disabilities
- Align of projects with regional and local housing elements
- Growth patterns must take into account the availability and quality of water resources for human consumption
- Mitigate environmental impacts of projects
- Incorporate environmental justice goals into SCS development and land use decisions

Definitions:

**Transportation equity:** Ensuring access to frequent, reliable, affordable and effective transportation options, regardless of race, income, age, location, nationality, primary language, sex, gender, culture, religion, or any other factor, so that all residents have access to opportunities, resources and services.

**Environmental justice:** The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to all decision-making that impacts them. Ensuring that disadvantaged communities receive an equitable share of benefits from infrastructure investments, in order to mitigate and remedy historical and current environmental harms that disproportionately affect disadvantaged communities and vulnerable groups.

**Disadvantaged communities:** Communities whose median household income is less than 80% of the statewide median household income, or are within the top 25% most vulnerable census tracts in the state as identified by CalEnviroScreen.

**Vulnerable groups:** Individuals with a higher vulnerability to environmental and other risks due to health, age (ex. children and seniors), location, income, language barriers, race, or any other factor.

**4. Under Goal 1, add: “Encourage local jurisdictions to provide incentives to promote public transit, walking and bicycling, and ridesharing, including as viable and convenient alternatives to driving,” and include references to other state transportation goals.**

We wish to call your attention to the ambitious goals that the California Department of Transportation (Caltrans) has set for shifting how Californians travel. Recognizing that alternatives to driving are urgently needed -- for the well-being of those who cannot drive, such as youth and the elderly; for those who cannot afford vehicles; and to achieve state air quality and climate goals -- Caltrans' Strategic Management Plan 2015-2020 calls for reducing per capita VMT by 15% statewide by 2020, compared to 2010, for tripling biking and for doubling walking and transit mode shares by 2020 compared to the 2010-12 California Household Travel survey. They recognize that to reach state goals, transportation agencies do need to be encouraging mode shift -- i.e., making transit and active transportation into viable alternatives to single occupancy vehicle use. Therefore we would suggest adding the following to this policy under Goal 1: "Encourage local jurisdictions to provide incentives to promote public transit, walking and bicycling, and ridesharing, including as viable and convenient alternatives to driving."

We would also suggest that FresnoCOG contribute to these and other state transportation goals such as these by listing them here:

"During planning processes, seek to ensure that planning efforts are as consistent as feasible with planning efforts such as: the Blueprint Planning Principles, Health in All Policies, the intent of SB375 (Senate Bill 375 also known as the Sustainable Communities Protection Act of 2008), Caltrans' Complete Streets Program, performance-based planning initiated by MAP-21, California Transportation Plan 2040 and the Caltrans Strategic Management Plan 2015-2020, and statewide and federal air quality goals, etc."

**5. Promote integrated land use and transportation planning within the SB 375 goal, particularly the availability of affordable homes near jobs**

We appreciate that the current policy element highlights the importance of partnering with local agencies to promote the integration of land use and transportation. Integrating these can best achieve climate reduction and air quality goals; improve equitable access to jobs, housing, and services; conserve habitat, farmland and other open space; and maximize the benefits of good regional planning. The benefits of this integration are at the heart of Sustainable Communities Strategies and SB 375. We therefore suggest these edits:

"Goal: A regional transportation and land use network consistent with the intent of SB 375 (Senate Bill 375 also known as the Sustainable Communities Protection Act of 2008)."

"Objective: Development of a regional transportation network which is environmentally sensitive, fosters sustainable regional growth, and helps reduce greenhouse gas emissions wherever possible."

While we recognize that FresnoCOG lacks land use authority and cannot achieve this goal on its own, as this Policy Element notes elsewhere, it can communicate with its member jurisdictions and align the actions that it does take with that purpose.

One key land use issue that Fresno COG and its member jurisdictions will address in the Regional Housing Needs Allocation and associated Housing Elements is the distribution of affordable housing. When jobs and homes are located close to one another, commutes are short. A lack of affordable homes in job-rich locations can spur long commutes. (One study of the Bay Area found that a lack of affordable homes there is *quadrupling* some workers' commutes.) We would encourage that a policy on this topic be added to the SB 375 Goal, such as "Educate member jurisdictions and other stakeholders about the benefits of a good match between the number of jobs, and those jobs' wages, with the availability and affordability of homes ("jobs-housing fit") in reducing commute lengths and saving money for households. Identify areas where the fit is poor, especially job-rich areas that lack affordable homes, and use the Regional Housing Needs Assessment process to prioritize housing growth in those areas."

**6. Expand farmland conservation policy to include "groundwater recharge areas and other natural and working lands" and ensure that land use scenarios and mitigation measures protect natural resources.**

Another critical land use issue is the conservation of natural and working lands. One policy encourages the COG to "minimize the loss of farmland with regard to construction of transportation projects." We would recommend expanding this to include "groundwater recharge areas and other natural and working lands." Fresno's 2018 SCS should also incorporate strategies outlined in [Sustainable Communities Strategies and Conservation: Results from the First Round and Policy Recommendations for Future Rounds](#).<sup>2</sup> In particular, land use scenarios should incorporate San Joaquin Valley Greenprint layers, including but not limited to habitat, important farmland, grazing land, and groundwater recharge areas, as constraints to development. Where transportation projects or the developments they serve have impacts on natural and working lands, we would recommend that these impacts be addressed comprehensively and cost-effectively through a regional advance mitigation planning (RAMP) program. Sequoia Riverlands Trust -- a regional, accredited land trust with extensive experience in Fresno County -- stands ready to help implement such a program.

**7. Recognize that roadway expansion induces more driving demand and prioritize more effective strategies that not only reduce congestion but better meet air quality and climate goals**

In the third goal under Section 5.2 "Highway, Streets, and Roads Goals," we appreciate that you removed Level of Service, an out-of-date concept. However, this section continues to imply that the goal is to

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<sup>2</sup> Livingston, A. 2016. Sustainable Communities Strategies and Conservation: Results from the First Round and Policy Recommendations for Future Rounds. Retrieved from <http://www.southernsierrapartnership.org/scs-policy-report.html>.

reduce congestion rather than to make it easy and convenient for people to drive less. It also implies that roadway development can alleviate congestion. However, research has found that expanding roadway capacity expansion is counterproductive. It fails to alleviate congestion and leads to both short- and long-term increases in vehicle miles traveled and associated air pollution. "A capacity expansion of 10% is likely to increase VMT by 3% to 6% in the short-run and 6% to 10% in the long-run."<sup>3</sup> We therefore suggest that you add a policy that reads: "Except where needed to serve existing communities that currently lack paved road networks, limit roadway expansion and instead prioritize alternative solutions to reduce congestion by promoting alternatives to single-occupancy driving, including public transit, telecommuting, car- and van-pooling, a better jobs-housing fit, and cycling or walking."

## **8. Add a goal that prioritizes road and bridge maintenance**

Section 5.2, "Highway, Streets, and Road Goals" currently lacks a goal or strategies that highlight the importance of road maintenance. This is important to local residents and recently received a large infusion of funding via SB 1. Road infrastructure funds should first be spent within existing communities, maintaining it in a state of good repair, before adding to the region's maintenance burden. Poorly-maintained roads with large potholes slow traffic, damage vehicles, and can even cause traffic or cycling accidents. A goal should read "Maintain highways, roads, and bridges in a state of good repair for all users." This could include two policies: (1) "Prioritize flexible roadway funds for the maintenance and operations of roads, bridges, and highways before allocating this funding to roadway expansion. When expanding existing roadways, ensure that adequate maintenance funding will be available and avoid adding to an unmet maintenance burden." (2) "Require that all projects incorporate complete streets to the extent feasible as outlined by SB 1. Identify and share with member jurisdictions high-quality standards for facilities such as the NACTO Urban Streets Guide and the LA Department of Public Health's Model Street Design Manual ([http://publichealth.lacounty.gov/place/docs/model\\_street\\_design\\_manual.pdf](http://publichealth.lacounty.gov/place/docs/model_street_design_manual.pdf))."

## **9. Include a policy that focuses on "first mile/last mile" solutions.**

We applaud the goal to develop "an integrated multimodal transportation system which facilitates the movement of people and goods." We would encourage a policy that focuses attention on "first mile / last mile" solutions. For example, someone might commute from Madera to downtown Fresno via the Amtrak, but they must then travel from downtown Fresno to their job or meeting location. Solutions for this "last mile" might include bikeshare, carshare, enhanced taxi service, employer-run shuttles, or other alternatives.

The policy might read: "Conduct a study that identifies first-mile last-mile linkages near transit stops and stations throughout the county. Work with local jurisdictions to identify solutions and prioritize these for funding, with a priority on high-volume transit and on transit that serves disadvantaged communities or communities of color."

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<sup>3</sup> Footnote: Handy, Susan. (2015). Increasing Highway Capacity Unlikely to Relieve Traffic Congestion. [http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST\\_Brief\\_InducedTravel\\_CS6\\_v3.pdf](http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf)

**10. Adopt a ten-year target and identify near-term investments to contribute to Caltrans' statewide goal of tripling biking and doubling walking by 2020.**

Related to the active transportation section, we wish to again highlight that Caltrans has set a statewide goal to triple biking and double walking mode shares by 2020 as compared to 2010-2012. We would encourage FresnoCOG to adopt the same ten-year target and then identify near-term investments that would achieve this. Given the relatively low rates of walking and biking and plans for infill investment in a number of communities, this target is likely well within reach.

**11. Modify active transportation goal to include a commitment to improving pedestrian- and cyclist-safety infrastructure and to bringing pedestrian and cyclist deaths to zero in ten years (Vision Zero).**

We appreciate that FresnoCOG wishes to improve bicycle and pedestrian safety, but we would modify that goal as follows: "...through education, enforcement, and improved infrastructure, with the goal of zero pedestrian and cyclist deaths in ten years ("Vision Zero")." Policies should be added to reflect the value of pedestrian- and cyclist-safety infrastructure, such as improved lane striping and protected bike lanes, the installation of stop signs and traffic signals, and traffic calming solutions. FresnoCOG could work with local jurisdictions to study and design strategies to improve dangerous streets and intersections. These interventions are particularly important in low-income communities and communities of color, where pedestrian and cyclist injuries are more common.

We welcome any questions you have concerning our recommendations, and look forward to working with Fresno COG staff to refine the Policy Element Outline for the 2018 RTP.

Sincerely,

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