



April 13, 2015

Chris Ratekin

Acting Chief, Office of State Planning
Division of Transportation Planning
chris.ratekin@dot.ca.gov

Re: Environmental Health Coalition comments on draft California Transportation Plan

Dear Mr. Ratekin:

Environmental Health Coalition is (EHC) is a 35-year-old nonprofit organization. EHC builds grassroots campaigns to confront the unjust consequences of toxic pollution, discriminatory land use, and unsustainable energy policies. Through leader development, organizing and advocacy, EHC improves the health of children, families, neighborhoods and the natural environment in the San Diego/Tijuana region.

EHC's Transportation Justice Campaign is focused on ensuring that overburdened¹ communities have increased access to transportation, improvements to public health and safety and equity in transportation planning, policies and investment. Transportation Justice comprises these key principles:

ACCESS

- All have access to sustainable, safe, affordable, and efficient transportation options and a complete transit system, regardless of ability, social-economic status, ethnicity/race, age, or gender
- Transportation options and land-use planning provide access to opportunities (i.e., jobs, schools, affordable housing, etc.) and goods and services (i.e., healthy foods, healthcare, parks, etc.)
- Access to opportunities for residents to participate in meaningful public engagement processes
- Access to financial transparency of transportation revenue and funding (i.e., financial reports be presented in layman's terms so they are easily understood by the general public)

PUBLIC HEALTH AND SAFETY

- Infrastructure investments, policies, and planning to improve pedestrian and bicycle rider safety
- Transportation projects, planning, investments and policies that reduce air pollution
- Transportation policies, planning and investment lead to the reduction of greenhouse gasses and incorporate climate adaptation strategies into infrastructure investments

EQUITY

- Transportation investments prioritized for overburdened neighborhoods, including fare discounts and special services for economically and socially marginalized groups

¹ "Overburdened communities" are low-income communities that are heavily impacted by air pollution, live in historically underserved neighborhoods in regards to the need for infrastructure improvements and efficient transit service, and spend a significant percentage of their income on transportation.

- Equitable distribution of transportation benefits, providing high-quality services to all and ensuring that overburdened communities do not bear excessive external costs (i.e., pollution, accident risk, financial costs, etc.)
- Means for collecting revenues to support infrastructure improvements and transit operations should not disproportionately burden those with lower incomes

EHC has reviewed the draft California Transportation Plan. We appreciate the opportunity to review the draft plan and have the following comments.

Support for Major Strategies

The broad general strategies for the plan are appropriate to move California toward a sustainable transportation system. In particular, we support reduction of vehicle miles traveled; development of an integrated, multimodal system; and elimination of emissive vehicles. We also applaud the plan's focus on social equity in its goals, and the consideration given to meeting California's GHG reduction goals as expressed in Executive Orders S-3-05 and B-16-2012.

EHC offers the following comments in support of the most aggressive alternative for meeting the state GHG goals, and to ensure that transportation equity is embedded in every aspect of the plan.

Support for Alternative 3 and the Imperative to Reform RTP/SCS Planning

Of the three Alternatives listed in Chapter 7, only Alternative 3 actually meets the 2050 goal of 80% below 1990 levels, as estimated in the analysis. EHC agrees that an aggressive set of strategies is required to meet the 2050 GHG goals. However, all three alternatives rely on existing MPO Sustainable Communities Strategies as a fundamental element of the Plan. In the case of San Diego, at least, this approach has a serious flaw. The existing SANDAG RTP/SCS, adopted in 2012, is estimated to produce an INCREASE in VMT and GHG emissions by 2050. Any alternative that relies on this RTP/SCS will be unlikely to achieve the 2050 goals and will be reliant for its effectiveness on future technologies that do not yet exist. It will fail to realize the GHG reductions that could be achieved by the kinds of land use changes and mode shifts that were urgently requested by a broad range of San Diegans, and rejected by the SANDAG Board when it adopted the current RTP in 2012.

Clearly, the regional transportation plans are a bedrock of California's transportation planning; however, the regional planning processes must be reformed to ensure that regional plans embody the DOT strategies of reduction of VMT, development of an integrated multimodal system, and elimination of emissions.

Performance Measures Must be Quantitative

Whereas the Plan's goals are ambitious, they are not quantified. Throughout the Plan, the performance measures must incorporate timelines and quantitative benchmarks to establish numeric targets and assess progress towards meeting the goals.

Performance measures should include those that are proposed (those marked with an asterisk in Table 1) as well as measures already in use. The proposed performance measures include metrics that are key to assessment of transportation justice, including a housing/transportation affordability index; bike and walk miles traveled; non-work mode share; and transit and rail travel time reliability.

As additional comments on the performance measures:

- The performance measures in gray on Table 1 are not legible in the draft plan. A darker or brighter color is needed to allow the public to fully assess the existing and planned performance measures.
- VMT and CO2 reduction per capita are included as performance measures; however, overall VMT and CO2 emissions must be tracked also, to ensure compliance with the state's 2050 GHG goals.

Incorporate Equity into All Plan Measures

EHC strongly supports the CTP 2040 Goal 5: Foster Healthy and Livable Communities and Promote Social Equity. In order to achieve social equity, the plan needs to include strategies and performance measures for equity in every program area. In particular, the Plan must prioritize and track:

- Reduction of Traffic Related Pollution in Regional Hot Spots
- Reduction of Collisions and Injuries in Communities of Concern
- Reduction of Transit Times for transit-dependent households
- Decreases in VMT and Increases in Bike and Walk Miles for Communities of Concern
- Cost Burden of Transportation for Low income communities

Additional Measures Needed to Achieve Goal 5 Health, Safety, and Equity

In addition to inclusion of equity in performance measures, additional strategies for achievement of Goal 5 should include the following actions:

- Develop community health, safety, and equity standards for transportation projects, and add these as requirements for all transportation funding that is under the control of DOT;
- Advocate for addition of community health, safety, and equity criteria to federal transportation funding as well;
- Require health impact assessments for transportation projects;
- Advocate for RTPs that fund transit first.

These are EHC's comments on the draft transportation plan. Thank you for the opportunity to comment on this important planning document.

Sincerely,



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Policy Advocate- Transportation Justice
Environmental Health Coalition