SACRAMENTO METROPOLITAN
AIR QUALITY
MANAGEMENT DISTRICT

Larry Greene
AIR POLLUTION CONTROL OFFICER

July 22, 2016

SENT VIA E-MAIL

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

Subject: 2016 Draft Metropolitan Planning Organization Regional Transportation Plan Guidelines

Dear Ms. Martinez-Velez,

The Sacramento Metropolitan Air Quality Management District (District) thanks the California Transportation Commission (CTC) and the California Department of Transportation (Caltrans) for the opportunity to review the 2016 Draft Metropolitan Planning Organization Regional Transportation Guidelines (Draft Guidelines). This follows up our July 13, 2016 correspondence that addressed public health topics in the Draft Guidelines.

We understand from recent conference communications that staff prefers text recommendations for specific comments on the Draft Guidelines. As such, comments below have text recommendations.

Land Use and Transportation Strategies to Address Regional Greenhouse Gas Emissions
Land use and transportation strategies to address regional greenhouse gas (GHG) emissions are addressed both in section 6.26 and Appendix I. In earlier correspondence we recommended consideration of prioritizing transportation projects with public health co-benefits, as an Appendix I planning and investment strategy. Other recommended strategies follow.

- In Appendix I under "Transportation Planning and Investment Strategies," the District recommends including "Fix It First" policies, for example with the following text: *Employ "Fix It First" policies to ensure that preventive maintenance and repair of existing roads are the highest priority for spending, to reduce overall maintenance costs, and to support development in existing centers and corridors.*

- In section 6.26, we recommend explicitly listing "Create active transportation plans" as a transportation strategy.

777 12th Street, 3rd Floor ▪ Sacramento, CA 95814-1908
916/874-4800 ▪ 916/874-4899 fax
www.airquality.org

Performance Measures

The District recommends adding public health and air quality to lists of performance measures, for example in chapter 6, sections 6.1 and 6.18. In earlier correspondence we recommended adding measures of public health to the list in section 6.1; we also recommend adding "Public Health" to the first list in section 6.18. Further, we recommend adding "Measures of environmental quality such as air quality" to the list in section 6.1.

Measures of public health outcomes in RTPs must be easily obtainable, with easily measurable indicators. The District recommends those provided in the California Health Interview Survey (CHIS). Following is example text to add to section 6.18's best practices discussion: *Public health performance measures must be easily obtainable and measurable, such as those provided by the California Health Interview Survey (CHIS) a random-dial telephone survey with representative public health data on all 58 counties in California. The CHIS is available at* http://healthpolicy.ucla.edu/chis/about/Pages/about.aspx.

Transportation Control Measures

In section 5.7 addressing air quality and transportation conformity, the District recommends including text to recommend transportation control measures (TCMs) that support State Implementation Plan (SIP) implementation through mechanisms to promote movement from single occupancy vehicles to more sustainable modes of transportation. This could be added to the paragraph on best practices on page 129, as follows: *Metropolitan Planning Organizations should work with local air districts to develop transportation control measures that include mechanisms to promote movement from single occupancy vehicles to more sustainable modes of transportation, in support of State Implementation Plans.*

Mobile Source Air Toxics

The District recommends discussion of mobile source air toxics (MSATs) in the Draft Guidelines, including near-roadway exposure. Following is example text that could be inserted as a section entitled "California Air Resources Board Air Quality and Land Use Handbook," under the "Modal Discussion" (possibly at the end of the discussion, as a new section between 6.13 and 6.14):

> *The association between respiratory and other non-cancer health effects, and proximity to high traffic roadways, is addressed in the California Air Resources Board's (CARB's)* Air Quality and Land Use Handbook *(Handbook). Diesel exhaust and other cancer-causing chemicals emitted from cars and trucks, known as mobile source air toxics (MSATs), are responsible for much of the overall cancer risk from airborne toxics in California. CARB community health risk assessments have resulted in information that should be considered when siting new "sensitive land uses," including residences, schools, day care centers, playgrounds, and medical facilities. Sensitive land uses deserve special attention because children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Properly addressing these siting situations is important preventative action. Any section of the RTP discussing highways, freight corridors, and other transportation facilities, should include the following.*
>
> 1. *Discussion of the siting of new freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing*

facilities, near sensitive land uses. The CARB Handbook contains siting recommendations.

2. *Discussion of MSAT health risk and exposure reduction at sensitive land uses, where sensitive land uses are sited near highways, freight corridors, and other transportation facilities associated with high MSAT exposure (within the minimum distances indicated in CARB's Handbook). Local air districts often have protocols for discussion of health risk, and best management practices for exposure reduction. The Federal Environmental Protection Agency has also released* Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality*.*

Modal Discussion

The District recommends that the "Modal Discussion" section in chapter 6, section 6.9, and in the Appendix C checklist include a public health listing, as follows.

- Section 6.9: *The benefits of active transportation and how the RTP supports active transportation planning.*
- Appendix C, first section: *Does the RTP include a discussion of public health, including active transportation and reduction of mobile source air toxics exposure?*

Please contact District staff member Molly Wright if you have any questions regarding these comments. Her contact information is mwright@airquality.org or (916) 874-4207.

Sincerely,

Larry F. Greene
Executive Director/Air Pollution Control Officer
Sacramento Metropolitan Air Quality Management District