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ClimatePlan



ACTIVE SGV



Bill Jahn, President  
Regional Council  
Southern California Association of Governments  
900 Wilshire Blvd., Ste. 1700  
Los Angeles, CA 90017

January 24, 2020  
RE: Comments on Connect SoCal 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy

Dear President Jahn,

Thank you for providing the opportunity to provide comments on the Connect SoCal 2020 update. The undersigned organizations have worked together in collaboration and we submit a joint letter for your consideration. Many of us have participated in Connect SoCal's Regional Transportation Plan (RTP) Sustainable Communities Strategy (SCS) update process through various working groups, workshops, policy committees, regional council meetings and one-on-one meetings with staff. We have been engaged in the process because we understand regional planning helps create a blueprint for shaping the region's future. We recognize that updating the RTP/SCS requires a tremendous amount of effort on a regional scale. Southern California has a vast amount of diverse geographic areas with various opportunities and challenges. We need a regional plan that provides policy solutions to our affordable housing crisis, safe options to walk and bike in our communities, and jobs in the local communities. Furthermore, we need a regional plan that addresses current and future climate change impacts for the most vulnerable communities.

Therefore, our joint letter is made of organizations who are invested in advocacy efforts throughout all of Southern California and are keeping the pulse of emerging planning needs from the desert to the sea. We present our comment letter in two main sections. First, we examine elements in the plan that we support. Second, we identify areas of improvement and provide policy recommendations under specific issue areas.

**Connect SoCal elements we support:**

- 1. Funding Community Based Organizations (CBO) for RTP/SCS outreach:** We support SCAG's efforts to contract with community based organizations to lead Connect SoCal outreach. We support the practice of paying CBO's for outreach work as trusted partners. We also hope that SCAG expands this model for other outreach needs, including working group member participation and technical assistance.
- 2. Inventory of Active Transportation Plans:** Appendix 2 of 6 in the active transportation report includes an inventory of city level, county level and multi-jurisdictional plans. This list of plans is extremely useful in that it allows advocates and community members to track the progress of the plans. Another useful tab would be to include information such as an agency website, where stakeholders can find more information on the plan itself. We applaud the effort of coordinating with jurisdictions to identify all plans that are in progress or are being developed within the region.
- 3. Improvement of public health data & *Health in All Policies* approach:** We are pleased to see the social determinants of health incorporated in the plan, especially in the public health report. This framework provides a critical perspective to develop policies that will positively impact health outcomes in our region.
- 4. Emphasis on non-infrastructure investments like Go Human and Safe Routes to School (SRTS) programs:** The plan elevates non-infrastructure programmatic projects like Go Human and SRTS as public educational opportunities. Go Human and SRTS are model avenues in which the public can learn more about active transportation options in their community and be engaged in the process. We applaud the inclusion of these

programs as good examples more jurisdiction should participate in. We encourage SCAG to expand their role in SRTS programs by initiating partnerships between Go Human and SRTS efforts in the region. More SRTS demonstration projects supported by Go Human's efforts are a key way that jurisdictions can grow their capacity around safety.

- 5. The inclusion of the Environmental Justice (EJ) Toolbox and the EJ report performance indicators:** The EJ working group provided comments on the EJ toolbox and we are pleased to see many of the comments included in the report. The EJ toolbox contains a strong list of policy options for jurisdictions to adopt. We also appreciate the inclusion of the EJ report performance indicators, as it makes it easier to see how EJ-related issue areas (such as active transportation hazards, climate resilience, accessibility to parks/open spaces) will impact particular elements of a general plan. Although not to be substituted for an EJ element, performance indicators help remind jurisdictions to incorporate EJ considerations throughout a general plan.

### **Connect SoCal elements that can be improved and strengthened in the 2020 update:**

#### **Community Engagement & Technical Assistance**

- 1. Expand community participation by providing educational opportunities for the public outside of the RTP/SCS update period:** Many of the undersigned organizations participated as Connect SoCal outreach partners. One of the lessons learned was that SCAG needs to do a better job demystifying the planning process and how the public fits into the feedback loop. We would recommend continuing to fund CBO's to conduct workshops such as a primer/introduction to elements of a general plan, the roles of public agencies, and others. Providing learning and feedback sessions outside of the RTP/SCS update period as well as progress reports on goals, would create stronger relationships. This recommendation would be especially useful in traditionally underserved communities and communities who have had less opportunities to engage with SCAG or its member agencies.
- 2. Connect SoCal should develop a funding guide:** SCAG should compile a technical assistance guide to funding opportunities that includes grant sources to fund policies described in the plan. Many of the model policies in Connect SoCal plans offer solutions to some of the most challenging planning issues. However, many jurisdictions, especially smaller and rural agencies lack the funding to act on developing policies. Connect SoCal should list funding opportunities and offer technical assistance to write grants.

#### **Active Transportation & Transit**

- 3. Increased investment in active transportation projects:** In terms of dollar amounts for active transportation investments, investments have doubled from the previous RTP/SCS. However, the proposed dollar investment percentage only adds up to 3.5% of the budget. The proposed percentage of investment makes it nearly impossible to achieve mode shifts. This proposed investment does not allow our region to meet our SB 375 targets. Given our region's climate goals, we cannot continue to rely on auto travel and need to shift more people to walking, biking, and transit. More aggressive investments would support mode shifts that would make it safer and easier to walk, bike and take transit. Instead, we recommend SCAG commit to investing 5% of the plan's budget to active transportation. By investing 5% into active transportation projects, we can fill the funding and infrastructure gaps in places that have active transportation plans

but cannot fund projects. The budget outlined in the plan also shows a breakdown of investments in programming. We recommend prioritizing investments towards projects that include complete streets elements as well as bike and pedestrian improvements in EJ/communities of concern and communities that have high per-capita affordable housing targets under the next Regional Housing Needs Allocation cycle.

4. **Assure that investments in active transportation projects will not result in increased policing:** As stated above, we are excited to see investments reflect needed improvements for biking, walking, and public transportation. However, given the concentration of high-risk streets in low-income neighborhoods of color, we also demand that those dollars not be spent on policing but on genuine evaluation, engineering, education, and engagement efforts that shift the dynamics from car-centric travel to a diverse range of safe options. Part of ensuring this safety is reducing police interactions with vulnerable community members.
5. **The plan should include a community engagement checklist and elevate universal design principles for active transportation projects:** We recommend that active transportation projects funded by SCAG grants should meet a checklist of community engagement standards, as well as universal design principles. SCAG should establish community engagement standards that ensure outreach includes diverse underserved populations and are language accessible. We also recommend that SCAG prioritize investing in projects that adopt universal design standards. Universal design principles ensure projects include accessibility features for all types of users, including users with disabilities. SCAG can also provide policy recommendations on how to incorporate universal design principles in projects that go beyond the minimum ADA requirements for sidewalks.
6. **Change the plans' focus to prioritize transit investments over freeways and reduce emphasis on highway expansion:** Freeway expansion is very much a focus in the plan, especially for counties outside of Los Angeles (including the Inland Empire and Orange Counties). Freeway expansion is mainly due to the compounding factors of goods movement and the housing and jobs mismatch. The plan should turn its attention to affordable housing projects, complete streets, and transit while avoiding all policies that promote freeway expansion and sprawl. The plan should prioritize transit and active transportation investments in communities that have high per-capita affordable housing targets under the next Regional Housing Needs Allocation cycle.

#### **Environmental Justice**

7. **SCAG needs to prioritize funding environmental justice plans, including climate resiliency plans for DACs and the SB 1000 EJ element:** As mentioned above, the inclusion of the EJ toolbox is a step in the right direction to help agencies address climate change impacts. Although the toolbox includes many strong policy recommendations, the toolbox fails to provide avenues for funding. In addition to providing a funding guide, SCAG needs to play a stronger role in providing technical support for plans related to environmental justice and resiliency plans in EJ areas. More agencies need funding and technical support to develop and implement such plans. SCAG should seek funds and invest in environmental justice planning support as well as climate resiliency plans. SCAG's Sustainable Communities Program would be a prime funding source that could support EJ projects.

- 8. Connect SoCal should address park inequities for environmental justice areas and invest in safe routes to parks/transit to trails:** The EJ report documents that inequities of park access create challenges for communities of color and vulnerable populations like elders and children (p. 74). In the case study of access to the San Gabriel Mountains (SGM), SCAG found no transit and limited rail service to the monument. Furthermore, both maps (Exhibit 19: Minority Distribution Overlaid with Natural lands and Local Parks, and Exhibit 20: Low-income households with Natural Land and Local Parks) depict severe park inequities, especially in the Inland Empire and parts of South and East Los Angeles County. These tables are not easy to interpret but it does present a bleak picture of park access. The accompanying tables depict the majority of our region faces transit trips that are upwards of 45 minutes to local parks or natural lands. Given this data, SCAG should invest in studies similar to the SGM case study, invest in rapid transit/AT to parks projects, transit to trails programs, and develop a multi-jurisdictional strategy for park access. CBO's can play a big role in providing feedback on strategies for safe routes to parks that include transit and active transportation projects. Furthermore, SCAG should encourage non-infrastructure programs such as Safe Routes to School and Go Human include education and encouragement strategies for park accessibility.
  
- 9. The Environmental Justice Technical Report should be more greatly aligned with other reports of the plan:** The Environmental Justice Technical Report should more explicitly align with other sections of the Plan that focus on equity. For example, the Public Health Technical Report focuses on the Social Determinants of Health yet these are barely mentioned in the Environmental Justice Technical Report. In order to promote greater coordination and collaboration between the practitioners and stakeholders who will ultimately be responsible for implementing this plan, these sections should be better aligned and reflect the data, strategies, goals and other elements identified in each section.
  
- 10. The Environmental Justice Technical Report needs to elevate the hazards of warehouse freight fleet as one of the biggest threats to community health and safety:** We are concerned with the growing number of freight fleets on the road. Considering that diesel particulate matter impacts public health (especially for Inland Empire communities), the EJ report should be better aligned with other appendices. The framing of sustainable growth within the plan applauds the growth of goods movement as a job stimulator. Elevating goods movement within a sustainable growth plan is antithetical to our goals around GHG reduction, anti-displacement strategies, bicycle and pedestrian safety, and environmental justice. The following policy strategies seek to center EJ communities by prioritizing public health:

  - a. The environmental justice technical report needs to include better data on the health impacts from freight/cargo pollution:** The EJ report should include data on community impacts from freight, which should be sourced from partners like the South Coast Air Quality Management District. Additionally, the EJ and Goods Movement reports should include an inventory of existing and planned industrial land use areas that result in the increasing freight truck traffic and idling near surrounding communities, which affect pollution levels but also safety for biking and walking given higher volumes of heavy vehicles. Such an inventory would help advocates and public agencies work together to address impact from freight. Data can also help illuminate policy reasoning for zero emission freight

and why we should hold industry accountable to change to clean fleets. This recommendation is especially critical for the Inland Empire, who carries 51.4% of the share of freight networks (p. 15 of the Goods Movement Report).

- b. The plan should include a cost benefit analysis of warehouse/cargo industries and accompanying fleet/aircraft:** Job creation is often cited as reason for expanding warehouses, but no study has ever been conducted to do a cost-benefit analysis of health impacts and warehouse jobs. SCAG should fund a study conducted by an outside consultant to assess health impacts from freight pollution, workers' safety, and traffic safety from expanding warehouses against the benefit of job wages. SCAG's report says the Inland Empire has more low wage jobs than any other area in the region and the report also shows the IE has among the highest concentration of communities of concern and environmental justice areas. We believe a cost benefit analysis would show that expanding warehouses is bad business for community health and does more damage in perpetuating the cycle of poverty. This study should also look at the likelihood of these jobs becoming automated, which would result in even fewer jobs in exchange for the negative impacts.

### **Goods Movement**

- 11. Develop stronger traffic safety policy for autonomous cargo vehicles from the goods movement industry:** The plan points to trends for increasing technology for autonomous cargo and is likely to become an industry standard. The plan states "Easier goods delivery can reduce the need for additional trips on the individual level, but if not properly planned for, the use of the sidewalk and curb for goods movement could have negative impacts on active transportation needs (p. 53, AT report)." SCAG needs to develop stronger model policies that protect the safety of active transportation users in an increasingly automated world. We also recommend that this issue be a topic for an upcoming active transportation working group that includes goods movement staff.
- 12. Include the consideration of public health and fair labor practices as a standard for the Goods Movement vision:** The Goods Movement report documents how Connect SoCal promotes the goods movement system vision (p. 6). The outlined vision prioritizes maximizing profit and does not consider mitigating or eliminating public health impacts nor does it consider fair labor practices. We recommend the following principles be added to the system vision:
  - a.** "The promotion of local and regional job creation and retention" principle should include community benefits agreements to ensure labor and public health standards. A community benefits agreement between industry and the surrounding community would allow community members an opportunity to voice their needs.

### **Public Health**

- 13. Incorporate and elevate the [California Healthy Places Index](http://www.healthypacesindex.org) in the plan:** The California Healthy Places Index, located at [www.healthypacesindex.org](http://www.healthypacesindex.org), is an increasingly significant resource for public health, social determinants of health and equity data for use by local, regional and State agencies across California. HPI is used in several statewide grant competitions including the Active Transportation Program and SCAG's own Sustainable Communities Planning Grants. Connect SoCal should elevate this model tool within the report overall to ensure jurisdiction can turn to the tool as a resource in their planning efforts, as well as the increasing number of State grant

programs using it as part of their selection criteria. For example, the public health report includes a mention of HPI on page 13, but without the use of data in any tables, maps or other visualizations like other datasets. We recommend adding HPI maps to strengthen the public health report as well as adding air quality HPI maps in the Environmental Justice report. Given the Plan's focus on the social determinants of health and health equity, we recommend incorporating HPI score maps, as well as maps of several of the indicators and decision support layers that represent the social determinants of health that are the focus of the Public Health Technical Report, such as housing (Housing Policy Action Area indicators), air quality (Environment Policy Action Area indicators), economic opportunity (Economic Policy Action Area indicators) and Climate Change (Climate Vulnerability decision support layers). We also recommend adding tables with additional public health information available in HPI to the Technical Report. This will ensure that the implementers of this Plan have a wide range of information available as they consider public health and health equity impacts of their decision-making in the region.

### **Climate change**

- 14. Elevate the discussion of climate change:** We are pleased to see an elevated focus on climate change compared to the last RTP/SCS plan. Climate change will be an increasingly important topic that jurisdictions will need to address. We are concerned that climate change impacts will have a disproportionate impact on communities of color, rural, under resourced, the elderly and children. We recommend the following actions to elevate climate change:
- a. We recommend that SCAG consider creating a standalone Technical Report devoted to Climate Change in order to provide specific data and strategies for addressing climate change in the SCAG region. Review and incorporation of jurisdiction climate action plans, climate adaptation plans, and/or sustainability plans may help guide the development of a Climate Change Technical Report. In addition, the discussion of climate change focuses on a narrow set of climate-related events such as wildfires and sea level rise. These discussions could benefit from a broader focus on climate adaptation and resilience, especially how they relate to the changing demographics of the region.
  - b. In the Public Health Technical Report under the Climate Change Expanded Analysis Section there should be greater emphasis on the importance of active transportation and public transit accessibility as a community climate resilience and health equity strategy, not solely as a climate mitigation strategy (via VMT reduction). Additionally, we recommend the inclusion of an analysis of the potential cost savings of more resilient active transportation and public transit systems in the projected climate scenarios.
  - c. In order to further address the nexus between public health, regional transportation plans, and climate change, we recommend explicitly addressing the public health risks of active transportation modes during extreme heat events, poor air quality days, and wildfire season. Similarly, we recommend including consideration of the importance of transportation needs, especially evacuation protocols, of vulnerable populations (e.g. elderly, disabled, socially isolated) during a climate-related event.
  - d. In order to increase the emphasis on climate adaptation and resilience, we recommend including current regional, local, and community-based climate resilience efforts within the Existing Conditions section, specifically the subsections that are directly related to climate change (e.g. Access to Parks and

Open Space, Air Quality, Smoke and Wildfires, etc.). Similarly, we recommended the inclusion of more specific data related to the disproportionate burden faced by low-income and communities of color due to current and future climate impacts (e.g. poor air quality, asthma rates, homes in inundation areas, etc.).

- e. We applaud the thoughtful consideration of the plan implementation strategies and actions. We propose the inclusion of HPI as a strategic tool to further Strategy 2, Action D. In order to advance the goals of Strategy 2 for Local Jurisdictions and Partners, and Strategies throughout the Plan and Technical Reports, we recommend including explicit language about providing financial support to community-based partners and community members for their engagement in stakeholder meetings and coalitions throughout the continued refinement, implementation, and evaluation of the Plan.

### **Connect SoCal Data**

**15. Improve data collection:** Data collection is a critical avenue for jurisdiction to analyze current and projected planning needs. We recommend the following strategies and considerations to improve data collection:

- a. We applaud the inclusion of Safety and Health measures in the overall Plan Performance measures, particularly the “Daily amount of walking and biking related to work and non-work trips” and the “Collision rates by severity and mode.” We encourage cities and counties to collaborate with SCAG, Public Safety Departments, Caltrans, and Public Health Departments to improve the collection of data to track these metrics over time at a granular level. Data collection will be particularly important in tracking the impacts and benefits of the plan to Environmental Justice communities where greater numbers of residents are reliant on active transportation modes.
- b. In order to provide more information and context to local jurisdictions, we recommend including additional data and evaluation strategies related to the impacts of active transportation, including; an analysis and model of the safety impacts of active transportation; a return on investment analysis for investments in active transportation infrastructure and technology; and a recommendation to systematically install automated counters along bike paths and other active transportation thoroughfares.
- c. We also urge SCAG to establish more meaningful targets for many of the goals in the Plan other than “improvement over baseline.” While the Plan touts the benefits of making the proposed transportation investments, this Plan covers a long range of time where more ambitious targets could be established and strived for by SCAG and its member cities and counties. The target-setting process for the Federal Highway Administration’s Safety Performance Measures was a good standard to follow and should be considered for other goals in the Plan, so we have greater accountability for meeting these goals. SCAG should also issue regular (at least every two years) reports identifying progress towards these targets.

**16. Connect SoCal plan should have an interactive data site:** The plan contains a rich amount of data ranging from public health, environmental justice, housing and active transportation. Much of the data is referenced from SCAG’s GIS open data portal, however it is not an accessible interactive source for the public. We recommend a few strategies to help make this data become more digestible for public consumption:

- a. Offer tutorials for how the public can engage with the GIS open data portal (A



potential group of interested parties could be CBOs who contributed in Connect SoCal community outreach, city and county staff).

- b. Connect SoCal should have interactive features that showcase data used in the plan and that is easily downloadable for the public. At an EJ working group meeting, staff mentioned that an interactive data feature for the EJ report is a possibility. We recommend to expand this idea to include the Connect SoCal plan's other technical reports and solicit feedback on its accessibility from the working groups.

Again, thank you for the opportunity to submit comments for the Connect SoCal RTP/SCS 2020 update. We look forward to working with you and SCAG staff on the inclusion and implementation of these policy recommendations. We are available to discuss any of these recommendations further upon request. We look forward to the implementation of the best version of the Connect SoCal plan that ensures we are planning for healthier futures.

Respectfully,

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