



ClimatePlan



Rosa De León Park, Executive Director
Stanislaus Council of Governments
1111 I Street, Suite 308
Modesto, CA 95354

5 July 2018

RE: Comments on the 2018 StanCOG Regional Transportation Plan / Sustainable Communities Strategy Draft Plan Update

Dear Ms. De León Park:

On behalf of the undersigned organizations, thank you for this opportunity to comment on the draft 2018 Stanislaus Council of Governments (StanCOG) Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). We recognize and appreciate the work that StanCOG staff, committees, and board members have invested in this plan. We would also like to thank you for the opportunity to meet with staff throughout the process to share our concerns, questions, and feedback.

Our organizations believe that sustainable land use and transportation planning is essential to achieving positive outcomes for Stanislaus communities, including: cleaner air; improved public health; economic vitality; safe and affordable access to schools, jobs, and services; housing and transportation choices; preservation of working lands and wildlands; and social equity. To that end, we are committed to supporting ambitious and achievable round two implementation of SB 375.

We applaud StanCOG's commitment to addressing the transportation needs of the communities within StanCOG as well as multimodal connections to neighboring regions. We stand with StanCOG in the belief that a robust and efficient transportation plan is key to economic

prosperity and improved quality of life for residents. After reviewing the draft RTP/SCS and speaking with staff, we believe this plan has the potential to further advance healthy, sustainable, and equitable communities in the region. We are especially supportive of the following:

- **Increased funding for transit in the 2018 draft plan:** This plan commits \$2.8 billion towards public transit, which represents 39% of total allocations in the financial plan. This builds significantly on both the 2014 and 2011 financial plans. It will provide residents with more options to travel within the region, as well as to neighboring communities. This improvement will also help to lessen traffic and congestions on the roadways.
- **Decreased share of transportation funding for roadways:** We are pleased to see that this plan decreases the share of funding for roadways. The 2011 plan committed 84% of its funds to roadways, the 2014 plan committed 61% of its funds to roadways, and now the 2018 plan is committing 53% of its funds to roadways. We are excited to see the trend of less investment in roadways, and more investment in public transit.
- **Planning for more multi-family homes and less land conversion:** We're excited to see that the draft RTP/SCS plans for more multifamily homes, greater residential density, and less land conversion than the 2014 adopted RTP/SCS. These are huge strides in the right direction. Increased density and multifamily homes provide residents with housing options to meet their needs, as well as protects natural and working lands.
- **Expanded public participation:** We commend staff efforts to expand outreach to communities throughout the region, and recognize that real progress has been made since the 2014 RTP/SCS update process. We encourage staff to continue to work with community-based organizations to help reach vulnerable and isolated populations.
- **Prioritizing social equity:** One of the goals of this plan is to “promote equitable access to opportunities by ensuring all populations share in the benefits of transportation improvements and are provided a range of transportation and housing choices.” We commend StanCOG for elevating underrepresented communities and are fully supportive of this ambitious goal to ensure all residents, despite their socioeconomic circumstances, benefit from this plan.

As engaged stakeholders in this process, we would also like to put forward the following recommendations for incorporation into the final plan.

Ensure clarity and transparency in GHG emissions reductions and VMT projections

The relationship between vehicle miles traveled (VMT) and greenhouse gas (GHG) emission reductions are growing increasingly complex with the advent of new automotive technologies, the emergence of “Transportation-as-a-Service” (TaaS) ridesharing platforms, and congestion considerations (the push-pull between VMT “rebound”¹ and induced demand²). VMT per capita

¹ “Measuring Vehicle Greenhouse Gas Emissions for SB 375 Implementation”. UCLA School of Public Affairs - The Ralph and Goldy Lewis Center for Regional Policy. <https://www.arb.ca.gov/cc/sb375/rtac/meetings/070709/commentaddendum.pdf>. Accessed 28 June 2018.

has commonly been used as a proxy for GHG emissions per capita. Given the complexity in the relationship between VMT and GHG, we recommend that staff:

- 1) Present projected aggregate VMT reduction *per capita*, including calculations from the transportation demand model as well as calculations from off-model strategies, as a performance metric.
- 2) Explain the variance between the projected GHG *per capita* reductions and the VMT *per capita* reduction. What investments and policies (or expected changes to behavior or available technologies) account for the difference between VMT reduction *per capita* and GHG reduction *per capita*?

Increase funding for active transportation

As noted above, we are fully supportive of the increase in funding for transit and would like to see a similar increase for active transportation. Active transportation plays a key role in improving public health, improving air quality, and connecting residents to transit. There are also state programs, like the Active Transportation Program, where StanCOG can leverage its funds with state funds to build bicycle networks to provide even more transportation options to residents. The plan commits only 5% of its funding to active transportation, which is similar to the 2014 and 2011 plan. If possible, we recommend StanCOG use its flexible funds to increase funding for active transportation.

Standardize performance targets and develop an implementation action plan

Since many of the performance indicators from the 2014 plan have changed with the 2018 draft, it has been difficult to track the progress of the region. We recommend that staff work with the board to adopt a set of performance targets³, to elevate the region's progress to residents as well as invested stakeholders. In addition to performance targets, we also recommend that staff work with the board to create—and adopt—an implementation action plan (IAP). This IAP can be a tool to engage residents and stakeholders in the implementation of the plan, and increasing understanding of the plan, especially its role in transportation spending and limitations around land use. We recommend the IAP include clear and measurable actions towards RTP/SCS goals, including investment in existing communities (e.g., development of mini-grant programs, outreach and education efforts, infill incentive programs, etc.). Each action item should have a short timeline horizon (1-3 years) to allow for progress assessment between RTP/SCS updates.

Prioritize affordable infill over greenfield development

As we stated previously, we are excited to see the draft RTP/SCS plan for more multi-family homes; however, we are concerned that the 2018 draft does not adequately plan for affordable infill development. According to the 2018 draft performance measures, 15.2% of new

² "Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions" Handy, Susan, et al. https://www.arb.ca.gov/cc/sb375/policies/hwycapacity/highway_capacity_brief.pdf. Accessed 28 June 2018.

³ "Leading the Way: Policies and Practices for Sustainable Communities Strategies". ClimatePlan. <https://d3n8a8pro7vhm.cloudfront.net/climateplan/pages/162/attachments/original/1501025796/Leading-the-Way-Full-Report.pdf>. Accessed 29 June 2018.

environmental justice (income/race combined) households will be built within a half-mile of a transit stop. But 32.4% of all new households will be built within a half-mile of a transit stop. Research has shown that higher income household drive more than twice as many miles and own twice the number of vehicles as extremely low-income households living within ¼ mile of transit stops⁴; in addition, low-income households are more likely to ride transit than higher income households. We recommend the plan prioritize placing low-income communities closer to transit to ensure they are able to travel to work, school, and other places.

Develop grants program to support active transportation and climate goals

We also recommend the development of a grants program to improve active transportation and help meet SCS goals. Other Northern California MPOs, including Fresno COG and the Metropolitan Transportation Commission (MTC) have developed grant programs to promote sustainable infrastructure and non-infrastructure such as Safe Routes to School. The Fresno COG's Sustainable Infrastructure Grant Program was approved in 2014 but only recently funded. In the Bay Area, the One Bay Area Grant (OBAG) program began in 2012 and resulted in an increase in active transportation investments, and resulted in 64 new Complete Streets policy resolutions⁵ in the Bay Area. Regional investments in these grants programs can also result in a stronger pipeline of projects that can successfully compete for state funding programs such as the state Active Transportation Program and the Affordable Housing and Sustainable Communities program.

We're excited to continue to partner with you in this work, and we appreciate staff efforts to meet with advocates and concerned residents. The nature of the RTP/SCS is both highly technical and abstract. This format can make it challenging for residents and advocates to participate in the process. We would like to partner with you in future RTP/SCS updates to ensure that all residents fully understand the plan and how it will shape their regions. Also, we urge staff to present the complete draft and final plans in Spanish as well as English.

In closing, we believe that Stanislaus COG can be a leader in sustainable, equitable, and economically beneficial transportation and land use planning and can set an ambitious but achievable standard for similar regions. We welcome the opportunity to meet with staff to discuss these comments and recommendations as you work towards the final 2018 RTP/SCS plan.

Respectfully submitted,

Yolanda Park
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⁴ "Why Creating and Preserving Affordable Homes Near Transit is a Highly Effective Climate Protection Strategy" TransForm, CA Housing Partnership Corporation.
<http://www.transformca.org/transform-report/why-creating-and-preserving-affordable-homes-near-transit-highly-effective-climate>.
Accessed 29 June 2018.

⁵ <https://escholarship.org/uc/item/49w1v7wz#main>. Accessed 30 April 2018.

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