



Andrew T. Chesley, Executive Director  
San Joaquin Council of Governments  
555 E Weber Avenue  
Stockton, CA 95202-2804

25 June 2018

**RE: Comments on the 2018 SJCOG Regional Transportation Plan / Sustainable Communities Strategy Final Plan Update**

Dear Mr. Chesley:

On behalf of the undersigned organizations, thank you for this opportunity to comment on the final 2018 SJCOG Regional Transportation Plan / Sustainable Communities Strategy. We appreciate the work that San Joaquin COG staff, committees, and board members have invested in this plan, and for the opportunity to meet with staff throughout the process to share our concerns, ask questions, and build relationships.

Our organizations believe that land use and transportation planning is central to achieving positive outcomes for San Joaquin 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 have two pressing concerns with the final plan. One, we are disappointed that the plan only reduces greenhouse gas (GHG) emissions by 15.7 percent per capita. This reduction backslides by 2 percent from the draft plan, and is only a 0.4 increase from the business-as-usual (BAU) scenario. When SB 375 was adopted in 2008, the goal was to address the role that land use and transportation played in relation to greenhouse gas emissions. As a state, we have continued to lead on climate change, with an even more ambitious target of greenhouse gas emissions 40 percent below 1990 levels by 2030. To achieve this goal, it is

essential that regions continue to pursue ambitious and achievable targets. ARB recently adopted 16% for SJCOG for its Round 3 target. We hope—and recommend—that SJCOG work collaboratively with the Metropolitan Planning Organizations in Merced County (MCAG) and Stanislaus County (StanCOG) to ensure a more visionary plan that sets an ambitious and achievable target. Two, the plan is not clear on the relationship between *per capita* GHG emissions reductions and VMT *per capita*. The final plan predicts that GHG emissions will continue to fall while VMT either remains static or fluctuates slightly. For future plans, if GHG emissions reductions are falling independently of VMT, it's important for the plan to clearly communicate the exact mechanisms that are driving this process. We understand there is now an appendix of off-model strategies; it should be clear and quantifiable how these strategies are reducing GHG emissions per capita. Moreover, the reduction of VMT remains important even if it is not a primary driver of GHG emissions reductions if we want to see healthy, sustainable, equitable communities where residents spend less time in traffic and congestion traveling to work. We recommend that SJCOG work collaboratively with other MPOs, ARB, and interested stakeholders to further clarify the relationship between VMT and GHG reduction per capita.

### **Importance of reducing VMT**

As mentioned above, reducing VMT is essential to advancing healthy, sustainable, and equitable communities. Reducing VMT can help shape transportation corridors that offer choice and reduce congestion by shifting people to transit and active transportation modes.

Conversely, corridors that are planned without consideration for VMT are likely to increase congestion and eliminate choice. Other VMT reduction strategies and benefits include:

- investing in active transportation infrastructure will positively impact public health;
- prioritizing building in existing communities will conserve open space and working lands while limiting taxpayer impacts of infrastructure build-out; and
- prioritizing transit can improve equitable access to essential services.

### **VMT reduction strategies and guidelines**

Our previous letter dated April 30th, 2018, includes a number of VMT reduction strategies, both programmatic and investments, that afford co-benefits beyond lowering GHG emissions. Each of those strategies deserves serious consideration and we invite staff and board members to revisit our initial letter to view our recommendations. Given our concern around a) the ultimate impact of the plan vs. BAU in terms of GHG emissions reductions, and b) the complex relationship between VMT and GHG emissions reductions, we'd like to highlight three recommendations in particular:

- *Reallocation of Roadway capacity funding to transit as well as active transportation and community enhancements to improve public health, support infill development, and drive economic activity in existing cities.* This reallocation would result in:
  - An increase in active transportation funding by 66% over the 2014 RTP/SCS to \$470 million,
  - An increase in transit funding by 33% over the 2014 RTP/SCS to \$4680 million, and
  - A commensurate reduction in roadway capacity by 38% to \$2025 million.

- *Ensure diverse housing options in all neighborhoods.* Current draft language states that diverse housing options will be concentrated within designated environmental justice neighborhoods at higher rates than other neighborhoods. By clustering different housing types within communities that experience higher rates of environmental and social burdens the RTP/SCS plan may unintentionally be promoting the concentration of neighborhood poverty and segregation. Research shows that providing multifamily and subsidized housing options in all neighborhoods increases household access to opportunity by ensuring residents of all income levels are able to access high-quality schools, jobs and businesses. Broadening the location of diverse housing options would also fall in line with federal and state fair housing goals. We suggest the COG direct staff to develop policy recommendations that can be turned into an “action plan” to be acted on after passage of the RTP. Such an action planning process could be used to create policy solutions related to housing, active transportation, jobs, etc.
- *SJCOG develop a grants program to improve active transportation, housing, 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 resolutions<sup>1</sup> 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.

### **Public outreach and participation**

As we mentioned in our letter dated April 30th, 2018, we appreciate the efforts made to reach out to underserved and low-income communities throughout the update process; we particularly want to acknowledge the coordination with local organizations who have worked to build trust with those communities. Coordination with local groups in outreach efforts has been recognized as a best practice in ClimatePlan’s report, “Leading the Way: Policies and Practices for Sustainable Communities Strategies”<sup>2</sup>; this cross-collaboration increases community engagement and participation. We hope these efforts continue in future updates and reach beyond the RTP/SCS process.

The nature of the RTP/SCS is both highly technical and abstract, which poses a significant barrier to participation both from the general public as well as advocates that lack specific technical skills. We recommend that in future RTP/SCS updates that special attention is given to increasing accessibility for all residents that wish to participate in and inform the process. The

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<sup>1</sup> <https://escholarship.org/uc/item/49w1v7wz#main>. Accessed 4/30/2018.

<sup>2</sup> “[Leading the Way: Policies and Practices for Sustainable Communities](#)”. ClimatePlan. 2016.

improvements we've seen in outreach should be matched by a commitment to make the planning process as accessible as possible, including efforts to present highly technical and abstract information in a way that is accessible to residents and advocates alike. Also, we urge staff to present the complete draft and final plans in Spanish as well as English.

We are excited to partner with you in this work. We appreciate the time and energy staff and the Board have spent on this plan, and value our working relationship with you. We believe SJCOG can be a model for similar communities that are facing unique challenges to reduce GHG emissions from both urban and rural communities. We welcome the opportunity to meet with staff to discuss these comments, and work together on implementation as well as the next plan.

Respectfully submitted,

Christopher Escárcega  
*Regional Engagement Coordinator, ClimatePlan*

Yolanda Park  
*Program Manager, Catholic Charities Diocese of Stockton*

Christina Peoples  
*Program Manager, Public Health Advocates*

Esperanza Vielma  
*Executive Director/Co Founder, Cafe Co-op*

Marty Martinez  
*Northern California Regional Policy Manager, Safe Routes to School National Partnership*

Jasmine Leek  
*Director, Third City Coalition*

CC: Diane Nguyen, Deputy Director - Planning/Programming & Project Delivery, SJCOG  
Kim Anderson, Senior Regional Planner, SJCOG  
Ryan Niblock, Senior Regional Planner, SJCOG  
Christine Corrales, Associate Regional Planner, SJCOG  
Lezlie Kimura Szeto, Manager - Sustainable Communities Policy and Planning, CARB  
Nesamani Kalandiyur, Manager - Transportation Analysis Section, CARB