

## Draft 2016 Regional Transportation Plan Guidelines Comment Form

Thank you for reviewing the Draft 2016 Regional Transportation Plan Guidelines document. Listed below are directions for submitting your input, ideas and comments specific to the Draft 2016 Regional Transportation Plan Guidelines document. The public comment period for this document begins Wednesday, September 21, 2016 and ends Friday, October 14, 2016, 5:00 PM PST.

Directions for submitting comments:

1. Fill out your contact information (type preferred)
2. Fill out your comments individually, providing as much detail as possible (type preferred). Please reference chapter and page numbers.
3. Submit your comments via:
  - a. E-mail: [RTP.Guidelines.Update@dot.ca.gov](mailto:RTP.Guidelines.Update@dot.ca.gov)
  - b. U.S. Mail:  
Priscilla Martinez-Velez  
Division of Transportation Planning, MS-32  
California Department of Transportation  
P.O. Box 942874  
Sacramento, CA 94274-0001
  - c. Fax: (916) 653-0001  
Attn: Priscilla Martinez-Velez
  - d. In person: 1120 N Street, Sacramento, CA  
Attn: Priscilla Martinez-Velez - Division of Transportation Planning MS-32

### Contact Information

We ask for your information so that we can contact you for clarification, if needed.

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**Draft 2016 Regional Transportation Plan Guidelines  
Comment Form**

**Comment**

Please provide as much detail to your comment as possible (attach multiple pages if necessary).

Chapter: \_\_\_\_\_ Page: \_\_\_\_\_

**Begin here:**  
(see Oct 14 comment letter)



October 14, 2016

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

RE: Comments on RTP Guidelines 2nd Draft

Dear Ms. Priscilla Martinez-Valez and CTC Staff:

We would like to thank you for allowing us the opportunity to provide comments on the second draft of the 2016 Regional Transportation Plan Guidelines (“Draft” or “Guidelines”). We commend the California Department of Transportation for its transparency in incorporating and receiving comments from stakeholders and other advocacy organizations. The comment log provided to us allowed for greater transparency during this update process and we very much appreciate that each comment is considered and acknowledged.

Our organizations focus on issues of social and environmental equity and the wellbeing of communities of color in the San Joaquin Valley. We were pleased to see that many of our comments were included in the Draft and language added to elevate the concerns and priorities currently facing rural, disadvantaged communities. Below, we outline the changes we are supportive of, reiterate points we expressed in our July 5 comment letter, and provide language recommendations in order to strengthen the Draft and ensure the inclusion of equitable land use and transportation planning strategies that benefit the communities most in need.

### **Considering Rural Communities in the SCS**

Firstly, we would like to thank CTC for including the section entitled, ‘Considering Rural Communities in the SCS.’ We support this addition and provide the following clarifications to strengthen the section and make it more inclusive of all types of rural communities.

While rural cities should be included in the RTP, unincorporated communities must also be considered. These communities are not incorporated into a city, but rather receive services from the county, special districts, or other jurisdiction in which they are located. In many cases, these services are fractured, incomplete, and inefficient. Improvements in active transportation infrastructure is generally not prioritized and is not adequately included in transit or other land use planning processes. Many communities, often legacy communities that house a majority of the region’s workforce, are left without streetlights, bike lanes, paved streets, and sidewalks. Historical land use patterns tend to support sprawl development, making it difficult for residents of rural, disadvantaged communities to access basic services using public transit or active modes of transportation. Public transit services in rural, unincorporated communities tend to operate at low frequencies

and are unreliable. Residents must drive vehicles or find other means to reach urban areas where medical services, groceries, and other essentials are located.

We offer the following recommendations to be included in this section of the guidelines:

- 'Rural, unincorporated communities' must be specifically identified.
- Direct MPOs to conduct a transportation needs assessment for each community to identify how transit routes and active transportation can be improved. The assessment must also identify opportunities for infill development of basic services in existing communities.
- MPOs must actively seek resources to fund these improvements and place investments in existing rural communities *first* to ensure greenhouse gas reductions and co-benefits do not only occur in urban areas.

## Housing

In order for the state to achieve its climate goals and move toward its vision of creating more walkable, healthier neighborhoods, housing issues must be included in land use and transportation plans. The Draft must include language that allows for collaboration between MPOs and Counties to ensure that Housing Elements in the General Plan and growth patterns in SCS' are aligned, as laid out in SB 375.

## Public Participation

We thank CTC for adding many of our recommendations regarding public participation into the Draft. Our organizations actively work to engage communities in decision making processes, and the recommendations we provided in our July 5th letter make for a more inclusionary process and ensure transparency.

We had also recommended that Fresno Council of Governments' recently adopted 2018 RTP/SCS Public Participation Plan be included as a best practice. The comment log indicated that this was added to Appendix M (Best Practices), but we were unable to locate this addition in the Draft. Any clarification for this change would be greatly appreciated.

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Thank you, again, for your consideration of these comments. Please contact me at (559) 369-2790 or [ndaryanani@leadershipcounsel.org](mailto:ndaryanani@leadershipcounsel.org) should you have any questions.

Sincerely,



Nikita Daryanani  
Policy Coordinator, Leadership Counsel for Justice and Accountability

Nayamin Martinez, MPH  
Director, Central California Environmental Justice Network

Kevin D. Hamilton, RRT  
Chief Executive Officer, Central California Asthma Collaborative