



October 14, 2016

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Via Email Submission: RTP.Guidelines.Update@dot.ca.gov

RE: Comments on 2016 Draft California MPO Regional Transportation Plan Guidelines

Dear Ms. Martinez-Velez:

On behalf of the California Pan-Ethnic Health Network (CPEHN), I want to thank again you for the opportunity to provide comments on the September 2016 draft updates to the Regional Transportation Plans (RTP) Guidelines. The California Pan-Ethnic Health Network (CPEHN) is a statewide multicultural health advocacy organization that works to ensure all Californians have access to quality health care and to promote equitable healthy land use and planning in underserved communities. We gather the strength of communities of color to build a united and powerful voice for health equity in all policies.

In our August 5, 2016, letter, CPEHN recommended a number changes to better incorporate health, equity and robust community engagement into the RTP Guidelines. Additionally, CPEHN signed on to joint coalition letters on the RTP process (June 29, 2016), a list of guiding principles (July 17, 2016), as well as the extensive RTP stakeholder group comment letter led by Safe Routes to School National Partnership (August 5, 2016).

CPEHN is pleased to see that many of the comments from the wider RTP stakeholder group letter and CPEHN's comments were incorporated into this latest draft. In this letter, we offer our feedback on how those comments were incorporated as well as further recommendations for improving this latest draft of the RTP Guidelines.

Below are CPEHN's comments from our August 5th letter, how CTC staff have included the comments into the September 2016 draft, and CPEHN's feedback on our recommendations moving forward into the next draft.

Section 2.3: Promoting Health

CPEHN Recommendation 1: Strengthen connection between community health, health equity and transportation planning.

CTC Staff Response: Comment incorporated

CPEHN Feedback: Thank you for incorporating our suggested language into page 31 of the September 2016 staff. In subsequent conversations, CTC staff has suggested refining the language we proposed. CPEHN concurs with these suggestions. The language has been proposed to be amended in the following ways:

- “Improving transportation infrastructure in ways that encourages walking and cycling is ~~an~~ **one** effective way to improve physical activity, decrease traffic collisions, and improve one’s health status (p. 31).”
- “For instance, health-focused transportation plans can help reduce the **number rate** of injuries and fatalities from collisions.” (p. 31)

CTC staff has also requested citations for studies referenced. CPEHN will provide those citations to staff directly.

Finally, CTC staff suggested moving bullet points listed under “Additional examples of how transportation planning can promote health include (p. 31)” to Chapter 5: RTP Environmental Considerations. In general, CPEHN is supportive of this move and looks forward to seeing how the examples are included in that chapter.

Appendix L: Promoting Health and Equity in MPO RTPs

CPEHN Recommendation 2: Develop a framework and checklist to illustrate how MPO policies, projects and programs meet public health goals.

CTC Staff Response: Comment incorporated.

CPEHN Feedback: Along with our public health partners, CPEHN appreciates the opportunity to provide substantial new language to Appendix L. In the coming weeks, we will continue to work with our partners and CTC staff to offer additional detailed comments to further refine Appendix L. We also look forward to discussing this appendix in its entirety during the scheduled November 3, 2016, workgroup meeting.

Section 4.3: Social Equity Factors

CPEHN Recommendation 3: *Strengthen best practices to encourage robust engagement of communities most affected by health inequities driven by planning and development, especially communities of color.*

- A.** *Amend Section 4.3 to encourage specified community engagement strategies and best practices as part of MPO planning processes*

CTC Staff Response: Comment incorporated.

CPEHN Feedback: Thank you for including in the September 2016 draft our list of strategies in its entirety.

- B.** *Amend Section 4.3 to replace “minority households” with more specific terminology, such as “communities of color” (p. 101).*

CTC Staff Response: Comment incorporated.

CPEHN Feedback: Thank you for amending this language to include more precise and specific terminology. We recommend that, where contextually appropriate, any additional places use “minority household” be replaced with specific language such as “low-income communities” or “communities of color.”

CPEHN Recommendation 4: *Encourage local governments or MPOs to conduct education and outreach before beginning the formal input process.*

CTC Staff Response: Comment incorporated.

CPEHN Feedback: Thank you for including specific practices that MPOs and local governments should consider utilizing to better conduct outreach and education prior to formal input processes.

Section 4.4: Participation Plan

CPEHN Recommendation 5: *Include local public health departments as stakeholders the MPOs should engage in developing their participation plan (p. 103).*

CTC Staff Response: Comment incorporated.

CPEHN Feedback: Thank you for including this addition in the September 2016 draft.

Additional Recommendation

CPEHN Recommendation 6: Create and include the civil rights section submitted by Public Advocates.

CTC Staff Response: Comment incorporated in Sections 4.2, 4.3, and 4.4.

CPEHN Feedback: We are pleased to see that a substantial portion of language suggested by Public Advocates was included in various sections of the latest draft or proposed for inclusion in other planning documents. However, some portions of the language appears to have not been incorporated. CPEHN recommends that CTC staff continue working with Public Advocates to find the most appropriate places for the remaining comments.

Thank you again for the opportunity to provide feedback on the new September 2016 draft of the RTP Guidelines. In particular, we applaud staffs' collaborative approach toward drafting the newly created Appendix L and hope to strengthen our partnership with the CTC through this approach in other programs and policies. Again, we look forward to working with you as revisions to the draft Guidelines proceed.

Should you have any questions, I may be reached via email at kchen@cpehn.org or by phone at (916) 447-1299.

Sincerely,



Kimberly Chen
Government Affairs Manager

Cc:

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