STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

EDMUND G. BROWN JR.
GOVERNOR

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DIRECTOR

February 14, 2012

Hasan Ikhrata
Executive Director
Southern California Association of Governments
818 W. Seventh Street, 12th Floor
Los Angeles, CA 90017

Dear Mr. Ikhrata,

The Governor's Office of Planning and Research (OPR) appreciates this opportunity to provide input on the Southern California Association of Governments (SCAG) 2035 Draft Regional Transportation Plan (RTP). This letter highlights aspects of SCAG's RTP that we think could inform other Metropolitan Planning Organizations' (MPOs') RTPs, and includes some suggestions for possible improvement. Additionally, we enclose comments shared with us by the California Department of Public Health.

Our comments highlight a number of achievements of the plan, and point to some opportunities for further improvement. The plan is grounded in empirical data, using performance measures to guide investment. These metrics are based on transparent modeling, and are broad enough to capture a number of factors important to decision-making. We also point to some opportunities to calculate other important metrics that could be added to even better inform decision-making. The plan also proposes a VMT fee for revenue generation; we suggest that in future analysis SCAG broaden discussion of its benefits and impacts. By showing a path of regional growth in a smaller urban footprint, it makes possible substantial habitat preservation and emissions reduction. We commend SCAG for the extensive technical analysis, policy development, and public outreach process which informed this document, achieving a 16 percent reduction of greenhouse gas emission (GHG) reductions by 2035, among the largest of any MPO's over that timeframe. The RTP estimates a reduction in congestion and an increase in active mode share as well. We look forward to working with SCAG as it proceeds with implementation of this plan.

Performance Based Planning

We are encouraged by SCAG's efforts to develop a plan based on quantitative measures of projected outcomes, or "performance metrics". In this RTP, SCAG provides data and discussion that covers a broad range of stakeholder interests, enabling broadly informed decision-making. We encourage SCAG to continue to develop its capacity to employ sophisticated scenario modeling, and to use that information to enable even better-informed decision-making.

Models used in regional transportation planning are increasingly important in informing transportation and land use decisions. These decisions direct billions of dollars in infrastructure investments and influence regional and local growth patterns. Transparency of models is therefore a prerequisite to transparency in the planning process and decision-making. The 2010 California Regional Transportation Plan Guidelines require MPOs to "disseminate the methodology, results, and key assumptions of whichever models it uses in a way that would be useable and understandable to the public."

We encourage MPOs to display as much information as possible, including model inputs, to help members of both the lay and technical public understand and compare model assumptions and results. Similarly, the model code itself should also be made available to members of the technical public for analysis. Consistent with the Regional Transportation Plan Guidelines, SCAG has appropriately made its modeling work available for public review. We appreciate SCAG's efforts in providing this information.

Applying Performance Metrics to Inform Policy

SCAG's RTP also relies on and discusses useful metrics, and provides clear descriptions of their meaning. One example of a clearly portrayed and useful metric in the SCAG RTP is "reliability." Figure 5.8 and Table 5.2 (p. 172) along with the accompanying narrative convey clearly the concept of reliability and its importance to an efficient transportation system. To explain reliability, the table relates variability in travel time to the time one must leave for a trip in order to have confidence in reaching a destination on time. This demonstrates the time lost by users of an unreliable facility.

Another useful metric in SCAG's RTP is "lost productivity" which measures the reduction in throughput resulting from congested roadways (Figure 5.5, p. 170). Use of this metric allows consideration of the potential benefits to the transportation system of transportation demand management measures. This presents an opportunity to discuss the potential effect of a VMT fee on the transportation system.

We suggest that SCAG provide additional context when using some metrics. For example, death rate listed per VMT (p. 19, fig 1.2) captures factors such as roadway design, but masks the safety benefits of reducing VMT. Similarly, metrics of delay (pp. 164-165) do not distinguish between long and short trips. Such metrics can penalize a short commute in traffic as compared to a long commute on the open highway.

Congestion metrics therefore do not capture the benefits to the transportation system of land use planning strategies that shorten trip lengths. While we believe the RTP would benefit from inclusion of trip length in the metrics used to describe the functioning the transportation network, we note that the RTP captures these by using separate land use metrics.

The RTP also uses safety and health metrics, such as collision rates by severity and by mode and tons of air pollutants emitted. The document provides important information by monetizing potential health benefits of air quality improvement (p. 30). We encourage SCAG to include another key metric, health benefits resulting from active transportation, such as walking and bicycling, in the evaluation. Please see the section "Quantify the Benefits of Active Transportation" below for further discussion.

SCAG's RTP appropriately describes several key co-benefits in the RTP (pp. 175-176). Further, the RTP also quantifies and monetizes those benefits so that they can be considered in cost benefit analyses. We encourage SCAG to clarify how those co-benefits are factored into the decision-making process, and also to expand the scope of co-benefit analyses in its future planning processes.

A Vehicle Miles Traveled Fee: a Funding Source with Potential Additional Benefits

The SCAG region has been a pioneer in the use of roadway tolling in California. Studies suggest that roadway tolling can provide a combination of revenue enhancement, system performance enhancement, human health benefit and environmental benefit. We appreciate SCAG's efforts in modeling and evaluating a VMT Fee as part of the RTP-SCS analysis.

As described in the RTP-SCS (p. 170), overloading a roadway substantially reduces vehicle flow. This in turn reduces the capacity of the roadway at exactly the time that capacity is most needed. One short-run solution is to build additional capacity, but building capacity is costly and the congestion relief is usually temporary. SCAG's consideration of effects of a well-administered VMT fee, including reducing congestion, and possible co-benefits to human health and the environment (e.g. reducing GHG emissions, improving air quality, and reducing collisions), is beneficial for decision-makers and the public. We appreciate SCAG's work in this area.

Quantify the Benefits of Active Transportation

In a letter commenting on RTP-SCS development, the California Department of Public Health points out that "...the potential for reducing chronic disease and greenhouse gases appears to be large on an absolute scale, and far larger than co-benefits from fine particulate matter reductions, which are a traditional focus of health effects" (letter enclosed).

We note that the RTP highlights the link between active transportation and human health (p.30). We recommend that future planning efforts quantify health benefits of

active transportation, so those benefits can be more specifically factored into the transportation planning process. We note that the RTP includes discussions delineating active mode share and accident/fatality rate for cyclists and pedestrians, and elsewhere in the document the expenditure share on active transportation. We recommend that these factors be considered together with active mode health benefits for a comprehensive analysis of this component of transportation plan.

System Preservation

In an era of dwindling transportation budgets, some agencies are deferring roadway maintenance. But doing so leads to more serious wear and damage, and the repairs that are needed as a result are much more expensive than proactive maintenance would have been. For long-run fiscal health, it makes sense to fund full upkeep of existing roadway and highway infrastructure before building more capacity. In this light, we appreciate SCAG's commitment of $217 Billion (nearly half of total expenditures) to system preservation, maintenance, and operation.

Protecting the Natural Environment

The RTP discusses the direct impact of roadway construction and operation on sensitive species via road wildlife strikes (p. 78). We note that the development that will be served by these roads could have a much greater geographic footprint than the roads themselves. As a result, the RTP should consider the potential the indirect impact roadway construction can have on land development, and in turn the impact of development on habitat. We encourage SCAG's continued engagement and facilitation in implementation of regional conservation plans.

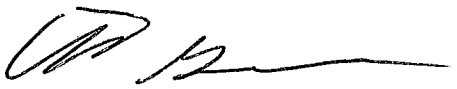
On page 174, the RTP presents the following definition of sustainability: "A transportation system is sustainable if it maintains its overall performance over time with the same costs for its users." The RTP should use a broader definition of sustainability that encompasses the environmental, social and economic metrics used elsewhere in the plan.

Implementation Monitoring Tracks Results of the Planning Process

The RTP anticipates substantial achievement that will be measured by a number of metrics. In order to determine whether these anticipated achievements occur, we suggest SCAG employ an implementation-monitoring program. Such a program would assess the extent to which local jurisdictions within SCAG approve development in accordance with the plan. It would test the assumptions used in the planning process, allowing for corrections to the plan so that it can continue to track a course towards stated targets. Also, it would check the assumptions made in the planning process, allowing calibration with empirical results.

OPR again commends SCAG for developing a high quality RTP-SCS. We hope that our comments are helpful. We appreciate the opportunity to submit these comments, and to offer our assistance in RTP-SCS development and implementation. If you have any questions, please do not hesitate to contact me at 916-324-9236 or chris.ganson@opr.ca.gov.

Sincerely,



Chris Ganson
Senior Planner

For: Ken Alex
Director

cc:
Heather Fargo, SGC
Linda Rudolf, CDPH
Doug Ito, CARB
Terry Roberts, CARB
Garth Hopkins, Caltrans

Attached: Comments by the California Department of Public Health on the Sustainable Community Strategies (SCS) Process and Plan Content

State of California—Health and Human Services Agency
California Department of Public Health

RON CHAPMAN, MD, MPH
Director & State Health Officer

EDMUND G. BROWN JR.
Governor

January 19, 2012

Christopher P. Ganson, Senior Planner
Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Dear Mr. Ganson,

We welcome the opportunity to comment on the Sustainable Community Strategies (SCS) that have recently been presented in draft or final formats by the large Metropolitan Planning Organizations. Although the California Department of Public Health does not have a regulatory role in the SB375 process, there are a number of compelling public health interests in the SCSs because of the documented health impacts of housing and transportation in combination with economic development, education, and their interactions to create healthy community environments. As the convener of the Strategic Growth Council's Health in All Policies Task Force, CDPH is working with other State agencies to optimize opportunities to improve public health and sustainability. CDPH staff has also played an educational and technical advisory role in some MPOs' discussions of performance targets and methodologies to assess project performance. CDPH also routinely interacts with local public health departments around the state, many of whom have become involved in regional SCS planning.

Our general and specific comments are detailed in the attached pages. We do note, however, that there are several health issues that fall outside of the current framework of SCSs but are concerns CDPH believes needs more attention. Although greenhouse gas reduction is a goal of the SCSs, climate change will increase risks from higher temperatures on the backdrop of an increasingly urbanized California. We feel there is a critical need to integrate urban heat island (UHI) mitigation strategies into regional and local plans that will implement transit oriented development (TOD) and in-fill development so that UHI risks are reduced as new development takes place. Access to health-promoting features of the built environment, including food systems, parks, and green space also should be integrated into planning.

Please do not hesitate to contact me if you have any questions or comments.

Sincerely,

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Comments by the California Department of Public Health on the Sustainable Community Strategies (SCS) Process and Plan Content

General Comments

Health is a critical component of sustainable communities. The California Department of Public Health encourages regional planning organizations to embrace the concepts outlined in the Healthy Community framework developed by the Strategic Growth Council's Health in All Policies Task Force.[1,p21] Many strategies that increase community sustainability can also support improved health outcomes. For example, policies that support active transportation help Californians incorporate more health-promoting physical activity into their lives, while also advancing goals to achieve greenhouse gas emission reductions. Infill development can help to reduce urban sprawl, reduce greenhouse gas emissions, and support location-efficient housing that promotes active transportation and allows workers to reap both economic and health benefits. Good health is critical for economic sustainability, increasing workforce participation and productivity, and slowing the ongoing rise in medical care expenditures, which diverts resources from other State priorities such as education or investments in green energy.

CDPH staff has reviewed the drafts and final versions of SCSs updates to the Regional Transportation Plans of the 4 large MPOs and the following comments represent a high level synthesis. First, we must laud the MPOs for the diligent work that has gone into these documents, and each represents an improvement from the original RTPs. We note an increasing number of performance measures that go beyond the traditional health focus on traffic injuries and air pollution. We refer to physical activity from active modes of travel, including bicycling, walking, and public transit that includes active transport from and to transit destinations. Noise and other physical hazards are also getting more attention as health performance measures. We also note that discussions of equity increasingly recognize that health inequities are caused and exacerbated by built environment factors and the uneven distribution of community resources. We are supportive of these developments which will deepen the appreciation of how public health is embodied in the many actions outside the field of health or health care.

Specific Recommendations

We have several recommendations that are based on existing trends in the SCSs and recent scientific developments in the transportation and public health fields.

1. Activity time in active transport (walking, bicycling, etc.) is indispensable as a health-related transportation performance measure (e.g., mean daily minutes per person of walking and bicycling). Health co-benefits of active transport in one of the large MPOs (Metropolitan Transportation Commission, MTC) has recently been quantified[2] and the potential for reducing chronic disease and greenhouse gases appears to be large on an absolute scale and far larger than co-benefits from fine particulate matter reductions, which are a traditional focus of health effects. These findings are consistent with emerging evidence from studies of other regions of the United States, London, Barcelona, and the Netherlands.[3-7] Attempts to monetize health co-benefits from active transport suggest savings of billions of dollars in health care costs and the value of statistical lives saved.[5]

2. MPOs should consider new tools that have recently become available to quantify the health co-benefits of active transport in SCS scenarios and projects. This fills a gap in project performance assessment at most MPOs. One such tool co-developed by the CDPH, MTC, the Bay Area Air Quality Management District and other researchers is called the Integrated Transport and Health Impacts Model (ITHIM), which was used to quantify the health co-benefits of active transport and low carbon driving in the San Francisco Bay Area. This tool could function as a post processor to travel demand models that generate miles traveled and activity times by mode. Modelers at several large MPOs are already exploring how it can be used to complement their methods for project performance assessment.

3. As tools such as ITHIM become available to MPOs, health co-benefits can be used as a criterion for a unique project category that *a priori* could get a high priority score in the project assessment methodologies used by MPOs.

4. Likewise, using these tools, health co-benefits can be used as a criterion to screen projects for cost-benefit and other in-depth analysis. In some MPOs current practice is to screen projects based on cost, so that only high cost projects get quantitative assessment. This would allow projects with large health co-benefits to also get additional scrutiny in cost-benefit analyses.

5. Equity/inequity in RTPS is currently framed using title VI of the Civil Rights Act, concepts of "no disparate impacts" and "increase access (to affordable housing/transit) to poor people", participation of communities of concern, environmental justice. In the development of SCSs some MPOs have been exposed to a health-based approach which explicitly calls for ways to narrow existing differences in health status and of determinants of health. The Sustainable Transportation Council (LEED-like approach to rating transportation systems) is considering a goal area in its transportation rating system that explicitly considers reducing health disparities.[8] This is a promising approach that deserves more attention.

6. Local health departments are highly interested and would benefit from mechanisms that enhance their participation in SCS development and follow-up. We noted with interest that SANDAG has a standing Public Health Advisory Committee in which the San Diego County Health Department is a partner, and our staff was able to attend one of their meetings. National organizations like the Transportation Research Board have recently created standing health subcommittees with an expanded focus. It is worth exploring ways local health departments and others interested in public health and equity can stay engaged on an on-going basis.

   This is particularly germane to a multidisciplinary approach to address the multiple health issues and the complexity of health impacts. In this setting expertise could be leveraged to explore the potential consequences of different scenarios and SCSs in the context of health risks and benefits, addressing air quality, physical activity, access to health promoting resources (e.g., transportation, food, employment, education), noise, injuries, social networks, etc. for the regional population and vulnerable subgroups.

References

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