

January 30, 2018

Amanda Monaco, J.D.
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Leadership Counsel for Justice and Accountability
764 P St., Suite 012
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RE: January 19, 2018 letter regarding the Draft 2018 Regional Transportation Plan Appendix H Environmental Justice Analysis

Ms. Monaco:

Fresno COG has received and thanks the Leadership Counsel (LC) for its January 19, 2018 letter addressing the Draft 2018 Regional Transportation Plan Appendix H Environmental Justice Analysis that was released for the subcommittee's review. Respectfully, Fresno COG offers the following responses to the comments raised in your letter.

1. We recommending dividing the county into local jurisdictions where possible, so that EJ measures can be localized and opportunities for improvement identified

Response: The EJ Analysis currently analyzes the region as federally required for low income and minority in EJ and non EJ TAZ as identified by the Subcommittee. In addition, the analysis is broken down by sub regions which include Fresno and Clovis Sphere of Influence, Rest of the County and Countywide to better capture the difference in impacts for urban and rural areas. Analysis by local jurisdictions is not federally required and does not provide a full picture of the EJ population as a whole in the region.

2. We recommend setting a measurable goal of how much transportation infrastructure should improve for EJ vs non-EJ communities, measured by region in the County

Response: The goal of the EJ Analysis is to analyze the impacts of projects and policies set forth by the RTP and ensure no disproportionately high and adverse effect on minority and low-income populations. Setting goals for infrastructure improvement is beyond the scope of the EJ Analysis Report.

3. We recommend that Fresno COG do a qualitative analysis of EJ communities' existing needs by conducting an extensive series of workshops with EJ communities

Response: As detailed in the Outreach section of the document, there has been an extensive effort to engage the public and populations living within the EJ communities to participate through the Mini Grant Efforts throughout the entire process. The RTP's transportation needs workshops in June/July 2017 alone had 516 attendees, resulting in 1218 suggestions for projects.

4. More accurate measures are needed to accurately capture disparities in existing infrastructure, and show whether the 2018 RTP investments will decrease those disparities

Response: All measures were approved by the EJ Subcommittee including the addition of two additional measures for housing mix and air contaminant exposure. The modeling results show that in terms of overall equity, the 2018 RTP's projects appear to distribute impacts evenly over Fresno County. In most cases, EJ communities fared better than non-EJ communities. With the exception of transit time in the Rest of the County (due to frequency and distance), all indicators favor EJ TAZs which perform better than Non EJ TAZs in 2042. As FCOG continues to develop the new activity based model, staff will continue to research additional measures to be included in the next EJ report.

5. The Accessibility and Mobility analysis should measure the condition of capital infrastructure

Response: The condition of capital infrastructure is not a consideration in the RTP modeling. There are no current models at Fresno COG that have this capability.

6. Housing affordability information is a necessary part of housing analysis

Response: Analyzing Affordability is not federally required. The inclusion of affordability as an Environmental Justice impact would require additional policy level discussion to clarify issues such as the definitions of affordable, market rate affordable, subsidize housing affordable, and threshold for affordability. Affordability can often times be determined by the project financing source, this would need to be reconciled. There are no current models that can directly predict or model housing affordability. The Housing Mix is a proxy oftentimes used by agencies to provide a rough picture of affordability. It shows whether there will be housing options other than single family housing available for residents in the region. Single family housing is typically the most unaffordable type of housing among the various housing developments.

7. Air contaminant exposure indicator should be expanded in radius and include roads with fewer high-pollution vehicles

Response: This indicator has been revised to 150 meters around Class 1 and Class 2 Roadways. The revised data has been included in the recent draft.

8. Explain how these indicators address the impacts of capacity increasing projects

Response: Capacity increase projects are included in the modeling and are reflected in the indicator results.

We appreciate your additional comments and suggestions, they will be shared with the Roundtable, TTC, PAC and the Board for consideration as the RTP continues to advance.

Thank you,



Tony Boren, Executive Director