



A Tides Center Project

Fresno Council of Governments

2035 Tulare Street, Suite 201

Fresno, CA 93721

Sent via email

**Re: Draft 2018 Regional Transportation Plan Appendix H Environmental Justice Analysis**

Dear Ms. Her-Cole,

Thank you for the opportunity to speak with you and Seth Scott about the Draft Appendix H, Environmental Justice Analysis (“EJ Analysis”), and for welcoming our comments and questions.

We would like to briefly voice our recommendations for improving the EJ Analysis. We know that Fresno COG staff have dedicated a lot of time to writing and expanding this analysis for the 2018 RTP, and has made improvements in this analysis due to public participation and collaboration with community-based organizations and the Fresno COG EJ subcommittee. We hope that Fresno COG will incorporate our recommendations, and look forward to seeing Fresno COG’s responses and to collaborating to ensure that the Environmental Justice Analysis is as accurate as possible.

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

Fresno COG has evaluated EJ communities by dividing the county into Fresno/Clovis and the rest of the County. With this division, the EJ analysis cannot show whether RTP improvements are actually addressing existing needs, and instead only yield aggregate numbers. For example, this does not allow Fresno COG to see that rural unincorporated communities’ needs are not being met as well by the RTP projects as EJ communities in Fresno/Clovis and other small cities.

We recommend dividing the county into individual local jurisdictions (Fresno County, Mendota, Sanger, Selma, etc.) so that the analysis can clearly capture where EJ communities’ transportation infrastructure is severely lagging behind that of non-EJ communities in the same jurisdiction. That way, Fresno COG can accurately assess where there are deficiencies in existing transportation infrastructure, and where RTP investments are and are not improving EJ communities’ transportation infrastructure as much as it is improving non-EJ communities’ transportation infrastructure.

**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**



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Fresno COG's EJ analysis seeks to show the gap between the impact of RTP investments in EJ communities versus non-EJ communities, and whether the RTP project list and the development trends in the SCS will reduce that gap.

We believe that the analysis should also focus on closing the gap between the conditions of transportation infrastructure in EJ and non-EJ communities. In addition, we would like to see Fresno COG set a quantitative goal of how much it seeks to close this gap, and evaluate whether will be achieved by the 2018 RTP. The EJ subcommittee should be consulted to determine how much the RTP should close the gap between EJ and non-EJ communities for each type of infrastructure and type of trip.

**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**

In addition to doing a quantitative measure of the RTP's impact on EJ versus non-EJ communities through modeling, we strongly recommend that Fresno COG conduct a more specific quantitative assessment of the needs of EJ communities.

Consulting EJ communities is the most effective way of determining what community needs are. This process has been started during the extensive public participation process for the 2018, when Fresno COG reached out to some EJ communities in the county to ask what bike, pedestrian, road, and transit projects their communities needed. The most effective EJ analysis would compile these project needs in all EJ communities in the County and assess whether those projects are being implemented by the RTP. Such an analysis would be the truest form of assessing whether EJ communities' needs are being met rather than an aggregate assumption of how projects will benefit families generated at random by Fresno COG's model.

While this would be a heavy lift, Fresno COG has already started this work and could work with community-based advocates to divide up the county into manageable regions and conduct a series of workshops soliciting EJ community needs. This snapshot in time would serve as a platform from which Fresno COG could assess whether RTP projects are truly addressing the specific needs of EJ communities in the county.

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

As we have expressed, we see that large disparities in transportation investments between EJ and non-EJ communities do not seem to be captured by the factors measured. As staff have rightly noted, the EJ analysis studies how Fresno COG's 2018 RTP investments will decrease disparities in transportation investment between EJ and non-EJ communities. However, the current disparities between EJ and non-EJ communities' access to vital infrastructure such as bike lanes, sidewalks, transit and good roads do not show in the EJ analysis.

We believe that these disparities should be captured by the Accessibility and Mobility analysis, and by the Distribution of Investments analysis. However, they do not appear to paint an accurate picture of



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existing infrastructure. Again, we suggest dividing out EJ communities into individual jurisdictions (Fresno County, Mendota, Sanger, Selma, etc.) so that the analysis can clearly capture where EJ communities' transportation infrastructure is severely lagging behind that of non-EJ communities in the same jurisdiction, and readers can also compare between jurisdictions.

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

Currently, the Accessibility and Mobility analysis does not include bike and pedestrian infrastructure, or the condition of road or transit infrastructure. If the commuting time takes road condition into account, that needs to be made clearer. However, an evaluation of the transportation infrastructure should include an indicator about the condition of the capital infrastructure, including bike and pedestrian infrastructure.

Furthermore, we recommend that Fresno COG provide more information on how it has determined the destinations to measure travel time impact.

We understand that Fresno COG staff are working with modeling constraints, and that limits the possible indicators. We believe that modeling is not showing the accurate picture of current conditions. Thus, we need to be able to rely on other tools, such as quantitative analyses, to get a clearer picture of current conditions in EJ versus non-EJ communities in the county.

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

Families in EJ communities need to have access to an affordable and effective way to get from their homes to jobs, education, critical resources, and recreational activities. Living in a home that they can afford is an integral part of that picture.

Fresno COG's housing obligations under FHHA and SB 375 should be incorporated into this analysis by evaluating how each jurisdiction in the County is fulfilling its affordable housing obligations, and how well affordable housing units are connected to the transportation network.

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

Air contamination is a critical issue in the San Joaquin Valley. Fresno County has the worst air quality in the nation, and one in six children in the San Joaquin Valley have asthma. This urgent situation requires that transportation planning activities consider the impact of transportation investments on air quality, particularly in EJ communities where families are the most burdened by socioeconomic and environmental factors. Communities that we work with experience high levels of asthma and respiratory problems from air contamination. This contamination comes not just from their proximity to freeways with heavy traffic; their air quality is harmed by lower levels of large trucks travelling through their communities to industrial areas.

We strongly recommend that Fresno COG expand its metrics to include EJ communities and household that are impacted by lower traffic but heavily polluting truck routes.

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



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Many of the projects on the 2018 RTP project list are capacity-increasing projects. Capacity-increasing projects have a myriad of impacts on EJ communities: they increase traffic, bringing more safety risks, air contamination, displacement, and dividing communities. These projects are not mentioned in the EJ analysis, and it is unclear if the EJ analysis takes into account the impact of these kinds of projects on EJ communities.

We recommend that Fresno COG address capacity-increasing projects in the EJ analysis and explain how these projects impact the indicators.

**9. We commend Fresno COG's firm commitment to developing tools that will more accurately measure equity in investment for the 2022 RTP.**

We are encouraged to see Fresno COG's commitment to developing an activity-based model and a mapping tool for mapping RTP projects. Both of these tools will be crucial in effectively modeling the impact of RTP projects on EJ communities for the 2022 RTP. However, we emphasize that modeling alone is not sufficient to accurately capture whether EJ communities' transportation needs are being met.

**10. Other edits:**

We also recommend the following edits:

- We also recommend that staff lay out what the federal orders cited on page 4 of the document require Fresno COG to do. As written, staff cites to the federal orders and state that they build on one another and contain frameworks for the EJ analysis, but does not explain what these orders require Fresno COG to do.
- We also suggest the addition of "where any disparities exist, take proactive steps to alleviate these disparities" as a fourth bullet point to describe Fresno COG's obligations on both page 4 and 5.
- We recommend that Fresno COG include development of the ABM and the mapping tool for mapping RTP projects under Outreach and Public Engagement Efforts as an outcome of public outreach and engagement.
- We recommend that staff isolate the legends from the tables to make the Demographic Profile tables easier to read

Please do not hesitate to reach out with further questions. We hope to discuss these edits further with Fresno COG staff and other members of the RTP Roundtable.

Sincerely,

Amanda Monaco

Policy Advocate

Leadership Counsel for Justice and Accountability