

January 30, 2018

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Mariah C. Thompson, Staff Attorney  
California Rural Legal Assistance, Inc.  
3747 E. Shields Ave.  
Fresno, CA 93726

RE: February 19, 2018 letter regarding the Draft 2018 Regional Transportation Plan Appendix H Environmental Justice Analysis

Ms. Thompson:

Fresno COG has received and thanks California Rural Legal Assistance 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. FCOG Must Clarify the Legal Obligations Imposed by Environmental Justice and Civil Rights Law

**Response:** The Environmental Justice Overview sets forth the laws and regulations Fresno COG must comply with in developing the RTP, and the analysis in the Environmental Justice Appendix is intended to demonstrate Fresno COG's compliance. In terms of clarifying the legal requirements, Fresno COG has taken your comments under consideration and has made some revision to the Environmental Justice Overview section as set forth below to further clarify the Federal and State requirements.

**Redline changes:** Under TITLE VI AND ENVIRONMENTAL JUSTICE OVERVIEW

- Title VI of the Civil Rights Act of 1964 (Title VI)
- Civil rights have expanded to include **sex gender, age religion**, and disability through **the Federal-Aid Highway Act of 1973, Age Discrimination Act of 1975, the Rehabilitation Act of 1973, and Americans with Disability Act of 1990.**

2. The Environmental Justice Analysis Should Include Substantially More Information about Current Conditions and Historical Trends

**Response:** Additional language to the Fresno County Demographic Profile section has been revised to reflect the existing conditions, demographics of the region with maps illustrating concentration of low income and minorities.

3. The EJ Analysis must include information about the modeling process and the assumptions made throughout

**Response:** Additional clarifying language has been included in the draft for each indicator further detailing the modeling assumptions, methodologies and metrics.

4. FCOG must use a more expansive data set to adequately capture air contamination in EJ communities

**Response:** Staff researched the recommended CDC Methodology and has included the modeling methodology and results in the revised draft. Analyses of individual criteria pollutant are modeled at a regional level and will be included in the Conformity appendix.

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

City of Clovis  
City of Coalinga  
City of Firebaugh  
City of Fowler  
City of Fresno  
City of Huron  
City of Kerman  
City of Kingsburg  
City of Mendota  
City of Orange Cove  
City of Parlier  
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