



SERVING LAND AND PEOPLE

June 26, 2018

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MAIL RECEIVED

Re: Comments on TCAG's 2018 Regional Transportation Plan/Sustainable Communities Strategy/ Programmatic Environmental Impact Report

Leadership Counsel for Justice and Accountability is an environmental justice nonprofit that works with rural and low-income communities affected by degraded environmental conditions, inequitable access to public transit, and adverse public health metrics. Sequoia Riverlands Trust is a Visalia-based, accredited land trust that inspires love and lasting protection for important lands, including habitat and farmland in Tulare County. We collectively have also held the Environmental and Environmental Justice seat on the RTP Roundtable and submit these comments to the TCAG policy board and staff with the intent to meaningfully shape the 2018 RTP/SCS to meet Tulare County's transit and environmental sustainability needs for all residents with particular emphasis on low-income, disadvantaged, and rural communities in the region. TCAG has made several improvements over the last two cycles of updates however, we believe there are several substantial and minor policy and programmatic improvements that can be made to ensure both GHG reduction targets and social equity are realized in Tulare County.

I. Recommended Changes to Policy Element

a. Identify and Include Rural Transportation Issues as a Regional Concern

Gov. Code § 65080(b)(1) states the RTP shall include a "policy element that *describes the transportation issues in the region, identifies and quantifies regional needs*, and describes the desired short-range and long-range transportation goals, and pragmatic objective and policy statements" (emphasis added). Furthermore, according to Caltrans' RTP Guidelines:

The consideration of rural communities within the region in the development of the RTP (including the SCS) is a key element in the process, to ensure that regional GHG reductions and associated co-benefits such as improved access to jobs and services are not achieved at the expense of small towns and rural communities where high frequency transit and/or high-density development is not feasible. The RTP process should consider policies and programs for investments in rural communities that improve sustainability and access to jobs and services and that protect resource areas, farmland, and agricultural economies."¹

We believe that the Draft RTP does not fulfill its potential or the direction of the Government Code or the RTP Guidelines to consider and respond to the transportation needs of the Tulare

¹ CTC RTP Guidelines for MPOs, p. 153.

County region and disadvantaged unincorporated and rural communities in particular. With roughly one-third of Tulare County's population living in unincorporated communities, a significant portion of residents face unique mobility needs and transit dynamics compared their urban counterparts. For example, many unincorporated communities have lower than average street conditions, unsafe pedestrian and bicycle infrastructure, lack robust transit, and face longer commutes.

3. To complete this addition, TCAG should use existing data including but not limited to Complete Streets studies, Community Infrastructure Plans, the Regional Active Transportation Plan, surveys collected for planning purposes and other sources of existing data to inform this section and identify short-range and long-range transportation goals to lower vehicle emissions and meet existing needs.² These short- and long-term goals should be accompanied by the identification of potential funding sources and actual allocations as needed to ensure any planning and project applications are completed in a timely fashion. We strongly encourage the completion of all remaining Complete Streets studies for unincorporated communities in addition 4. to identifying vulnerabilities and barriers relating to transportation investments in rural communities including but not limited to risk of ground subsidence, impact of truck traffic on active transportation infrastructure, dust, and the role that streets play in absorbing heat during summer. Increasing below-state average transit ridership and bike/pedestrian trips via improved safety and operational measures, provision of active transportation infrastructure, and innovative solutions to rural barriers should be a pillar of the 2018 RTP/SCS. 5.

Through a series of community meetings in addition to the June 25th TCAG workshop, several overarching themes were identified by residents including:

- Need for safety protection from high velocity corridors that intersect or are adjacent to communities
- Need for increased prioritization of projects for intra-community navigation
- Need for improved transit that increases intra-community accessibility and increases inter-community connectivity
- Desire for incorporation of climate adaptation for resiliency of infrastructure including support facilities like bus shelters to increase conveniences and reduce barriers to access
- Increased consideration for social and mobility needs of youth and residents without personal vehicles
- Full inclusion for communities in regional and local planning
- Urgency for long-term, sustainable solutions to poor road quality

6. We recommend that TCAG fully incorporate the feedback from community residents to reassess the current policy element.

7. **b. Policy Element Must be Pragmatic, Action-Oriented to Meet Needs of Disadvantaged Communities**

State law requires that the RTP be “*action-oriented and pragmatic, considering both the short-term and long-term future,*” and that it “*present clear, concise policy guidance to local and*

² SB 375 Sec 4. 65080 (b)(1)(F) The requirements of this section may be met utilizing existing sources of information.

state officials.”³ “As written, many of the policies are phrased to avoid the directive terms “must” and “shall,” and instead, use suggestive terms like “should”, “encourage” or “support”. This language renders the Policy Element vague and does not provide the clear, action-oriented, and pragmatic guidance called for by state law. TCAG must revise the Draft RTP to address this deficiency and strengthen its language to create “pragmatic” and “action-oriented policies” that serve all segments of the population in both the “short-term and long term.” Below is a list of recommendations and modifications to existing policy we believe will further these goals:⁴

GOAL: PROVIDE AN EFFICIENT, INTEGRATED, MULTI MODAL TRANSPORTATION SYSTEM FOR THE MOVEMENT OF PEOPLE AND GOODS THAT ENHANCES THE PHYSICAL, ECONOMIC, AND SOCIAL ENVIRONMENT IN TULARE COUNTY REGION

Objective: Encourage and support a connected and multimodal regional circulation network that is convenient, safe, and efficient

Policies:

2. Implement a Complete Streets Program whereby agencies will prepare plans to accommodate all transportation users, including pedestrians, bicyclists, transit riders, and motor operators and riders, and utilize existing revenue and other funding sources to coordinate with local agencies to implement completed plans as aggressively as feasible by submitting at least 5-10 projects applications per funding cycle
4. Make existing road and bridge maintenance a high priority

Objective: Support communities in developing walkable, bikeable, and transit-ready neighborhoods that work in tandem with motor vehicle facilities for a safe and complement local circulation system for people of all levels of income and various availability of resources

Policies

1. Fund Frontload the funding of feasibility studies, complete streets studies, and community and neighborhood plan to evaluate for transit readiness, walkability, and bike ability, as funds are available
4. Ensure and measure progress in achieving equitable access to effective and viable transportation options for all, regardless of race, gender, income, national origin, age, physical ability with a focus on benefiting the regions’ most vulnerable populations and closing existing unmet transportation gaps that are warranted
5. ~~Consider conducting~~ Fund barrier studies, consistent with state recommendations

SYSTEM PERFORMANCE

GOAL: ENCOURAGE AND SUPPORT AN EFFICIENT, MAINTAINED, AND SAFE CIRCULATION NETWORK THAT MAXIMIZES CIRCULATION, LONGEVITY, AND FISCAL RESPONSIBILITY WHILE MINIMIZING ENVIRONMENTAL IMPACTS

³ SB 375 Sec 4. 65080

⁴ Within this section, proposed revisions to existing text are in italics and deletions are shown with strikethrough.

Objective: Encourage and support an efficient regional road and circulation system that provides maximum achievable mobility and accessibility for vehicles, bicycles, pedestrians, and public transportation

Policies:

1. Maintain a Level of Service C or better on rural roads and Level of Service D or better on urban roads
15. 2. Assist member agencies with completion of new and partial systems, such as gaps in bicycle paths and underserved locations requiring public transit
16. 3. Maintain a PCI of at least 65 for rural and urban communities.

Objective:

Encourage and support a safe and reliable regional road system

Policies:

17. 1. Consider safety improvement projects for regional and local traffic corridors.
18. 3. Identify future local and regional road and circulation needs on an as-needed basis
19. 6. Prioritize benefits for disadvantaged communities

Objective: Plan for and implement cost-effective transportation improvements which utilize all types of public funds, including federal, state, and local funds and funds allocated by formula, competitive grants, or other sources

Policies:

20. 1. Rank and score transportation projects based on regional significance, safety, cost-effectiveness, environmental benefits, benefits to disadvantaged communities and project warrant based on specific funding guidelines and Measure R project identification
21. 3. Encourage and support alternative transportation improvements, such as roundabouts and flexible micro transit, when feasible
22. 5. By 2020 convene a public working group similar to the RTP roundtable to reevaluate and develop transparent scoring criteria including SB 32 and SB 375 goals and defining equity metrics and benefits to disadvantaged communities to ensure TCAG affirmatively removes the effects of discriminatory practices pursuant to Title VI of the Civil Rights Act.

Objective: Encourage and support a sustainable regional road and circulation system

Policies:

23. 1. Encourage and support projects that are valuable to the local and regional road and circulation system that reduce vehicle miles traveled, improve level of service, contribute to a reduction in air quality pollutants and greenhouse gases, conserve agricultural land, habitat, groundwater recharge areas, and create safe travel corridors within the region

Objective: Minimize environmental impacts of transportation projects and encourage the coexistence of nature and human circulation needs

Policies:

1. Evaluate and assist agencies with mitigation possibilities, when feasible, working with Measure R environmental funds and other funding opportunities, to assist with mitigation of road projects found in the RTP

24. 4. When feasible, encourage clean and mass transit as a mitigation measure to significant environmental impacts resulting from highway projects

Objective: Promote fair and equitable transportation improvements throughout the region

Policies:

2. Conduct an equity analysis using existing studies and expenditure data to assess historical trends of inequitable development and needs for low-income and disadvantaged communities

25.

26. Objective: Allocate sufficient funding to perform public outreach to ensure the reasonable satisfaction and meeting of needs of the public

Policies:

5. Identify funding to ensure public notices and key documents are readily available in multiple languages, electronically and TCAG's office

27.

6. Provide response to oral and written comments with a transparent process for consideration and incorporation in planning updates

28.

7. Ensure translation and interpretation is available and hold meetings at reasonable times and accessible locations for low-income residents

29.

8. Provide follow-up meeting and outreach to stakeholders involved in scenario selection and throughout the transportation decision-making process

30.

TRANSIT

Objective: Encourage and support the development of a safe, efficient, effective, and economical public transit system

Policies:

16. Launch community vanpools and flexible micro transit service with special attention to rural and disadvantaged communities

31.

ACTIVE TRANSPORTATION

Objective: Encourage bicycle usage in Tulare County by providing safe and convenient bike routes and facilities

Policies

9. Utilize Cap and Trade funds along with other sources of funds for bicycle and pedestrian projects, if available, for projects in Tulare County

32.

10. Support the closure of gaps in the bicycle and pedestrian systems to improve connectivity and attractiveness of these modes of transportation
12. Utilize SB-1 planning funds to continue completion of Complete Streets Plans for rural communities, when funds are available
13. Double walking and triple biking in rural and urban communities in alignment with Caltrans' State Bicycle and Pedestrian Plan

Objective: Educate, incentivize, and enable residents to utilize active mode of transportation

Policies:

3. Encourage and support maintenance and enhancement of existing bicycle and pedestrian facilities
7. Prioritize projects that increase safety and meet a community's identified active transportation needs
8. Design or modify active transportation outreach and educational materials, including online resources specific to community needs and are relevant, accessible, practical, and available in the spoken languages of those communities

Objective: Support safe pedestrian walkways within the transportation network in Tulare County

Policies:

2. Encourage cities and county agencies to consider needs of pedestrians and people with disabilities during the project review process and policies in their general plans
6. Utilize Actively seek out Cap and Trade and other funds, if available, for various projects in Tulare County that will contribute to the reduction of greenhouse gas emissions.

AIR QUALITY AND GREENHOUSE GASES

Objective: Plan for and implement coordination of land use and alternative mode of transportation that would reduce vehicle miles traveled by providing residents transportation options in multiple modes

Policies:

1. Plan for and implement coordination of land use and alternative modes of transportation that would reduce miles traveled by providing rural and urban residents transportation options in multiple modes

Objective: Prioritize projects that contribute to improved air quality and reduced greenhouse gas emissions

Policies:

3. Promote the equitable adoption of clean, renewable energy technologies to ensure a reliable energy supply, enhance the region's economy, and improve air quality locally and regionally.
4. Expand awareness of the need to reduce greenhouse gases to both agencies and the public and incorporate the latest scientific information into planning efforts.

PUBLIC HEALTH

Objective: Consider effects on public health when investing in the transportation system, giving specific attention to bicycle and pedestrian projects

Policies:

1. Support investment in bicycle and pedestrian systems, giving attention to projects and networks that will allow residents to walk and bicycle to frequented destinations and key service providers, including transit stops
3. Prioritize projects to reduce pedestrian-vehicle related injuries
4. Analyze the air quality and pedestrian safety implications when considering highway expansion

ENVIRONMENTAL JUSTICE

Objective: Require regional transportation planning that is consistent with Title VI and Environmental Justice Federal Requirements

Policies:

1. Assure that transportation project benefits and burdens are not inequitably distributed throughout the region. Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations throughout the region by frontloading projects within short- and long-term planning horizons
2. Identify and address, as appropriate, disproportionality high and adverse human health or environmental effect of its programs, policies, and activities on minority populations by ensuring low-income and disadvantaged communities given first priority for investment in short and long-term planning periods
3. Assure that TCAG avoid, minimizes, or mitigates disproportionately high and adverse human health and environmental effects of projects it funds, including social and economic effects, on minority populations and low-income populations through development of equity analyses and incorporation of community-identified benefits.

We believe with these policies will affirm TCAG's intention to comply with existing obligations under state and federal law. Furthermore we believe meaningfully implementing these policies will allow TCAG to begin the 2018-2022 cycle with a more robust policy element in better position to continue to meet resident need and to pursue grants for low-income and disadvantaged communities.

II. Recommended Changes to Action Element

- a. Identify a Timeline Within the 2018-2022 Cycle to Ensure Timely Benefits to Disadvantaged Communities

We appreciate the addition of many policies intended to further the goals of SB 375 and to reduce VMT and meet GHG reduction targets such as providing first and last mile connections, increasing public use of transit, and inclusion of barrier studies. However, while

51. the Draft RTP provides some timelines for potential construction projects, the timelines included in the RTP are deficient from lack of detail and potential for significant delay of benefits for low-income and disadvantaged communities. Government Code § 65080(b)(3) requires that the RTP include an Action Element that describes “programs and actions necessary to implement the plan and assigns implementation responsibilities.” Section 65080(b)(3) compliments and 52. reinforces the requirement set forth in Section 65080(a) that the RTP be “action oriented and pragmatic.” Without these timelines, the Draft falls short of Section 65080’s mandate that the RTP be “action oriented and pragmatic” and identify clear roles and responsibilities for 53. implementation. 54.

We recommend that TCAG revise the timelines for projects identified to meet the needs of the low-income Tulare County residents within each year to ensure the needs of disadvantaged communities are met in a timely fashion within the 2018-2022 planning cycle and throughout the 2042 planning horizon. Well-timed implementation of policy will facilitate TCAG’s goals of 55. 18.6% GHG reductions per capita and assure TCAG is planning affirmatively to address historical inequity. Many projects for rural communities are small and inexpensive and their 56. impact on public safety is much more critical than other projects slated for more immediate construction. TCAG should include a policy to address the public health and safety risks 57. associated with absent or deficient infrastructure and take affirmative actions to remove or ameliorate disparate adverse conditions impacting disadvantaged communities. 58.

Identifying timelines will assist in planning and assuring protected classes within Tulare County are adequately served within the 2018-2022 RTP Cycle. Federal Transportation Administration Circular 4703.1 identifies three guiding environmental justice principles which 59. COGs must incorporate within the transportation decision-making process. The third principle require COGs and other agencies to “prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.”

To provide clear direction to address community needs and satisfy TCAG’s duty to ensure timely delivery of benefits and services to minority and low-income populations, we also ask that the 2018 RTP/ SCS include a description of specific investments, funding sources, and 60. actions that will be implemented during the first four years to address the needs identified and prioritized by disadvantaged communities in existing planning documents or during public comment periods. Adequate incorporation into timelines is key to address the documented creation of disadvantaged unincorporated communities as a product of redlining and discriminatory real estate practices coupled with historic trends of disinvestment.

⁵ Section 21.5 (b) (7) “Where prior discriminatory practice or usage tends, on the grounds of race, color, or national origin to exclude individuals from participation in, to deny them the benefits of, or to subject them to discrimination under any program or activity to which this part applies, the applicant or recipient must take affirmative action to remove or overcome the effects of the prior discriminatory practice or usage. Even in the absence of prior discriminatory practice or usage, a recipient in administering a program or activity to which this part applies, is expected to take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin.”

⁶ U.S Dept. of Transportation, updated Environmental Justice Order 5610.2 (a) (amended 5/2/2012), pp. 14-15. App. sec 1 (f); Federal Transit Administration Circular 4703.1, “Environmental Justice Policy Guidance for Federal Transit Administration Recipients” (Aug. 15,2012), pp.2)

b. Revise Project Selection Criteria

61. TCAG's project selection criteria should be developed to facilitate addressing the needs of disadvantaged communities including fully mitigating the potential significant environmental impacts of the RTP identified in the PEIR. As an internally consistent document, this selection criteria would complement TCAG's proposed objective to "Ensure equitable access to effective and viable transportation options for all, regardless of race, gender, income, national origin, age, physical ability with a focus on benefiting the regions' most vulnerable populations and closing exiting unmet transportation gaps that are warranted." We also encourage TCAG to create a selection criterion for prioritizing projects for public participation throughout the project planning and environmental review phases.

III. Recommended Changes to Sustainable Communities Strategy

a. Maximize funding for healthy, equitable, and sustainable communities and the transportation choices that make them possible

62. Despite the projected goals for GHG reductions, TCAG's Blueprint Scenario projects minimal increases for walking and biking by the 2042 planning horizon. As currently drafted, the 2018 RTP/SCS reads: "Walking and biking mode count are expected to increase by 0.63% and 0.08% percent, respectively, when compared to existing conditions. The growth will be more significant in urban areas with the increase number of close destinations and activities, and less so in rural areas where distances and lack of infrastructure may make some walk and bicycles trips impractical."⁷

64. Larger increases in transit are needed to provide real and timely alternatives to residents of Tulare County. Currently, transit ridership is lower than the state average since many barriers prevent widespread usage thus perpetuating reliance on personal vehicles or informal carpooling for transportation. For example, the draft document states "TCAT is the county connector service for rural to urban areas with the largest area to cover and receives the lowest estimated ridership in the county on some routes"⁸. To increase use of transit especially in rural areas of the county we suggest a policy to expand use of micro transit. While the existing partnership with CalVans Vanpool program we encourage other models of micro transit like Cantua Creek Van Y Vienen, a community-led rideshare program that provides reliable service, local hire, and flexibility in destination to meet a community's local needs.⁹ This model provides valuable insight to reducing VMT and GHG emissions through rural electrification and the flexibility to meet community needs and destinations and has potential for implementation in Tulare County.

65. Furthermore, statute requires TCAG to "explicitly consider" the input of the public participation process. The results from the 71 outreach events identified barriers as to why survey participants do not use transit. Data reveals that some of the most significant barriers to using public transit were that transit:

67. A) does not stop near their homes

⁷2018 RTP/SCS, Health Impact Assessment. Pg. 11

⁸Ibid. pg 12.

⁹ "Van Y Vienen" Brings Electric Vehicle Ride Sharing to Two Rural Fresno Communities. Retrieved from: <http://kvrpr.org/post/van-y-vienen-brings-electric-vehicle-ride-sharing-two-rural-fresno-communities>

67. B) does not stop where they need to go
C) does not run late
D) does not come often enough.

As a result, the policy element should include policies to explicitly consider, address and overcome the barriers recorded through outreach. Meaningful actions may yield higher than projected increases in transit ridership and help mitigate road congestion and improve farebox recovery.

68. **b. Shift Funds Away From Road Expansion and Toward Investments That Meet Regional Health, Equity, and Sustainability Goals**

It is well established that by 2042 Tulare County will experience a vast population growth of roughly 133,000, an increase of 22% in vehicle trips per day by the year 2042 so planning includes roadway expansion and congestion management i.e. "Caltrans and the Tulare County region will be placing more emphasis on corridors as an important element of the transportation system."¹⁰ However, minimal increases in transit and active transportation fundamentally preserve a transportation system predicated on continued reliance of passenger vehicles as the primary source of transit. The 2018 RTP/SCS states that, although the preferred scenario will provide different mobility options, "the clear majority of Tulare County Residents will still use automobiles to complete a majority of trips, especially those over three miles." Current assumptions conclude a -0.10% reduction in total mileage traveled and a 11.20% increase in Transit ridership (from 35,700 to 39,700 rides per day). The Highway and arterial investments included in the Plan attempt to optimize the existing system and expand it were necessary to ensure that the mobility needs of the region are met yet still result in an estimated 287 new miles of road to be built. The new lane miles in TCAG's 2018 RTP/SCS reduce congestion yet in doing so but creates various significant environmental impacts as a result.

70. The Draft RTP's emphasis highway expansion and road development to facilitate travel by car neglects existing and future active transportation and public transit needs of Tulare County residents, and in particular, the needs of lower income residents and residents of color who disproportionately lack access to personal vehicles to meet their transportation needs. By failing to invest adequately in these modes of transportation, the RTP entrenches existing disparities in access to appropriate transportation options that impact historically disadvantaged communities and runs counter to applicable law and guidance which emphasizes the importance of holistic transportation planning to meet the needs of all users, including pedestrians, cyclists, and residents of disadvantaged communities, and addresses resiliency needs. See e.g., 23 C.F.R. § 450.300 (setting forth the national policy that each MPO conduct a comprehensive transportation-planning process which encourages and promotes the mobility needs of pedestrians and cyclists); 23 C.F.R. § 450.305 (Requiring MPOs to conduct a comprehensive planning process which increases the accessibility and improves resiliency of the transportation system); 23 C.F.R. § 450.324(f) (providing that the metropolitan transportation system should function as an integrated system with pedestrian and bicycle facilities). The Final RTP must

71. ¹⁰ 2018 RTP/SCS Action Element pg. B-50.

71. correct this imbalance by dedicating additional resources to address active transportation and other transportation needs of people without access to a personal vehicle. Our recommendations in other parts of this letter regarding improving allocations to address the transit needs of disadvantaged communities generally support this aim.

72. **c. Prioritize Existing Road Maintenance Needs**

73. Regional Transportation Plans adopted after May 26, 2018 must “[e]mphasize the preservation of the existing transportation system.”¹¹ The 2018 RTP/SCS adds 287 miles of roadway however does not identify the roads, active transportation, and public transit infrastructure slated to be continually affected by deferred maintenance. Without the ability to meet its current maintenance burden, the existing transportation system will further deteriorate over the 2042 horizon.

According to TCAG statistics, Tulare County has over 3,100 miles of rural roads that are behind in maintenance. However, with current funding, the County estimates that overall Pavement Condition Index (PCI) would drop from overall at 66 to 57 by 2027. To maintain the existing PCI an additional \$7 million is needed. The City of Visalia determined it will take an additional \$7.5 million to maintain its current PCI at a level of 60. With the current level of funding, the City’s PCI is also estimated to decline. The City of Tulare estimates there is a \$60 million in deferred maintenance that will necessitate ongoing expenditures of at least \$4.5 million a year to maintain a PCI of 70. Porterville estimates there is a \$13.15 million shortfall for road maintenances to reach its goal of increasing its current rating of 55 to 75.¹²

74. Many unincorporated communities have PCIs much lower than the averages of larger metropolitan areas. In community meetings, residents from Matheny Tract, West Goshen, Ivanhoe, Tooleville, and Tulare claim that the general state of disrepair leads to increased costs burdens concerning general wear and tear on their personal vehicles and prevents safe active transit. This had led to increased pedestrian danger and inability to fully utilize local travel corridors to navigate within a community and access key transit stops or routes that connect to essential services.

75. Additionally, to the extent that active transportation and public transit infrastructure does exist in disadvantaged communities and lower-income neighborhoods, it is more often than not crumbling or in a state of disrepair.

76. In keeping with MAP-21, we strongly urge that TCAG revise the Draft RTP to account for the maintenance needs of existing roads and active and public transportation infrastructure with emphasis in considering the needs disadvantaged communities.¹³ Maintaining local roads will also provide for increased traffic to be redirected from major highway corridors by personal and transit vehicles, potentially lessening the need for costly highway expansion and subsequent maintenance burdens.

¹¹ Title 23 U.S.C. § 134 (amended by Moving Ahead for Progress in the 21st Century (MAP-21) and Fixing America’s Surface Transportation (FAST) Acts, which apply to RTPs adopted after May 26, 2018) (H) emphasize the preservation of the existing transportation system.

¹² 2018 RTP/SCS Action element pg. B 66 - B 68.

¹³ (23 C.F.R. 450.316(a)(1)(vii) (23 C.F.R. 450.316(a)(1)(vii)).

76. **d. Recognize That Roadway Expansion Induces More Driving Demand and Prioritize More Effective Strategies That Not Only Reduce Congestion But Better Meet Air Quality And Climate Goals**

77. Although congestion management is required through regulations, the 2018 RTP/SCS allocates a disproportionate share of funding to this end rather than towards alternatives that make it easy and convenient for people to drive less and that support the state's infill development and greenhouse gas reduction goals. Research has found that expanding roadway capacity has the potential to be counterproductive. It fails to alleviate congestion and leads to both short- and long-term increases in vet and associated air pollution. Susan Handy concludes, "A capacity expansion of 10% is likely to increase VMT by 3% to 6% in the short-run and 6% to 10% in the long-run."¹⁴ Other research has demonstrated that induced traffic from highway expansion leads to increased congestion on feeder streets and on-ramps that offset some of the air quality and congestion benefits of the project.¹⁵

78. Transit plays a key role in the regional effort to reduce traffic congestion, VMT and vehicle emissions particularly in urbanized areas. The increased use of transit is a key element to meeting legislative requirements such as AB 32 and SB 375. Transit systems also play a key role in the mobility for those individuals who are unable to drive, including youth and the elderly, as well as low income individuals and people with disabilities. MAP-21/FAST Act added a new requirement for RTPs to also include transportation and transit enhancement activities, including consideration of the role that intercity buses ay play in reducing congestion, pollution, and energy consumption in a cost-effective manner and strategies and investments that preserve and enhance intercity bus systems, including systems that are privately owned and operated, including transportation alternatives, as defined in 23 U.S.C. 101(a)

82. **e. Incorporate Projects Other Than Highway Expansion Early On In Planning Period to Meet Address Needs of Low-Income and Disadvantaged Communities**

83. While the 2018 RTP/SCS does reduce congestion overall compared to a no project scenario, TCAG claims "However, there is an insignificant amount of roadway experiencing poor service levels in environmental justice TAZ's overall." However, service levels are not the only concern as identified in community meetings or TCAG's public workshop on June 25th. As such, we recommend that TCAG should analyze and frontload other community-driven projects which fit EJ communities' needs including but not limited to improving safety and increased multi-modal connectivity more appropriately to identify if these needs are met and if investments are as equitable as TCAG claims otherwise.

¹⁴ Handy, Susan. (2015) Increasing Highway Capacity Unlikely to Relieve Traffic Congestion. *National Center for Sustainable Transportation* Retrieved from

http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf

¹⁵ Font, Anna et al (2014) Degradation in urban air quality from construction activity and increased traffic arising from a road widening scheme in *Science of the Total Environment*. Retrieved from

<https://www.sciencedirect.com/science/article/pii/S0048969714010900>. Vedantham, Ram et al (2011) Combining continuous near-road monitoring and inverse modeling to isolate the effect of highway expansion on a school in Las Vegas in *Atmospheric Pollution Research*. Retrieved on

<https://www.sciencedirect.com/science/article/pii/S1309104215304608>.

84. For example, the Communities of Matheny Tract, Tooleville, Ivanhoe, Ducor, and West Goshen have expressed interest in increased access to micro transit in their communities. A viable option which is currently in service is *Van y Vienen*, a community-operated on-demand 100% electric vanpool. This innovative partnership with Green Commuter and Fresno EOC fills gaps in service for community residents in Cantua Creek and El Porvenir, two disadvantaged unincorporated communities in west Fresno County.¹⁶ This program formalizes to some degree an internal culture of carpooling that exists through necessity in many low income and disadvantaged communities in the Valley and Tulare County.

85. We also recommend the explicit consideration of projects proposed by community members. A recipient of federal funding may not “utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because their race, color, or national origin.”¹⁷ TCAG’s method of selecting projects of allowing local jurisdictions to select which projects are included in the RTP results in the near categorical exclusion of projects proposed by residents to benefit communities disproportionately comprised of protected classes and therefore has an unlawful effect of denying transportation improvements based on residents’ inclusion in a protected class. Without any analysis, TCAG effectively ignores that input. TCAG’s methodology therefore conflicts with the federal requirement that MPOs “explicitly consider” input provided by the public and that carretera identified by the Department of Transportation to assess TCAG’s Title VI compliance.

f. Support Rural Smart Growth

87. TCAG should implement effective policies for rural smart growth to comply with its obligation to address current disparities in transportation investment.¹⁸ Such a policy would also preserve farmland and reduce GHG emissions by encouraging existing developments in rural communities and compliment the recently approved Community, Hamlet, and Legacy Plans conducted by Tulare County. In order to comply with law requiring requiring the RTP to be an “internally consistent” document, TCAG should integrate rural smart growth throughout the document, including in the Policy Element, Action, Growth Scenario, and other chapters.¹⁹

IV. Environmental Justice Chapter

a. Define and provide metrics for “Fair Share”

88. While we appreciate TCAG’s initial analysis to identify projects’ adverse impacts on disadvantaged and federally protected communities there is no clear definition as to what a community’s “fair share” of project allocation is. Existing statute states “Each MPO is required by federal regulation and by state laws to plan for and implement transportation system improvements that will provide a fair share of benefits to all residents, regardless of race, ethnicity or income level”.²⁰ A formal definition of “fair share” should be developed by TCAG in

¹⁶ <http://kvpr.org/post/van-y-vienen-brings-electric-vehicle-ride-sharing-two-rural-fresno-communities>

¹⁷ 49 CFR Section 21.5(b)(2); See also Gov. Code Section 11135

¹⁸ DOT Title VI Regulations 49 CFR 21.5(b)(7).

¹⁹ Government Code Section 65080 (b).

²⁰ CTC RTP Guidelines for MPOs, pg 74.

88. consultation with community members to provide clear and actionable direction to inform the 2018 RTP/SCS's 2018-2022 and 2018-2042 planning horizons.

89. To ensure the 2018 RTP/SCS incorporates a "fair share" of expenditures and benefits to low-income and disadvantaged communities we recommend referencing the California Air Resources Board's Greenhouse Gas Reduction Fund expenditure guidelines as a measure of equity. These guidelines require implementing agencies to "give priority to those [investments] that maximize benefits to disadvantaged communities" by favoring projects which "provide. . . the most significant benefits to them." More specifically, the Guidelines require that every investment intended to benefit a disadvantaged community and "provide direct, meaningful, and assured benefits to one or more disadvantaged communities."²¹ ARB's guidelines specify the benefit each GGRF investment must provide as "a benefit that meaningfully addresses an important community need" in a disadvantaged community and as such we recommend a total investment ratio *at least* between the 25% per recommendations of the GGRF and the 33% which represents the percentage of total EJ TAZ population for Tulare County utilized for modeling purposes.

b. Redefine Equitable Distribution of Benefits

90. As an internally-consistent document, TCAG's 2018 RTP/SCS should be guided by a policy that states: "Ensure equitable distribution of benefits and burdens of transportation projects in alignment with TCAG's Title VI and Environmental Justice obligations through timeline implementation of projects identified in needs assessments and requested by disadvantaged communities and environmental justice communities." As an key planning document, the RTP affords an opportunity to meet California's climate goals relating to drastically reducing vehicle emissions or incorporating climate adaptation into policy and projects. Next, both state and federal law mandates TCAG to ensure the RTP incorporates equity and does not cause intentional or disparate impacts and fully incorporates low-income and disadvantaged communities into the transportation decision-making process. To this end, 23 CFR 450.316 (a)(1)(vii) states that TCAG must consider the needs of those traditionally underserved by existing transportation system, such as low-income and minority households, who may face challenges accessing employment and other services.

91. As written the 2018 RTP/SCS provides for an inequitable share of projected investments for Disadvantaged Communities in Tulare County. First, we do not endorse the metric of "Share of Area in County" as an adequate environmental justice determinant when determining "fair share". If this calculation is based on population and proportion of vehicles over "Share of Area in County", logic would lead one to insist "Share of Roadway Projects in EJ Communities" were increased to 33% instead of 10.2%.²² As a result, we do not agree with TCAG's claim that "EJ Communities will be receiving a larger share of roadway projects than just the area that they cover" being equitable.

Total Distance of RTP Road Projects (mi)	344
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²¹ Air Resources Board, Cap-and-Trade Auction Proceeds Funding Guidelines for Agencies that Administer California Climate Investments (Dec. 2015), p.2 A-6.

²²TCAG RTP/SCS Environmental Justice Chapter, pg. 12.

Total Distance of Road Projects in EJ Communities	35.15
Share of Roadway Projects in EJ Communities	10.2%
EJ Communities Share of Area in County (Excluding National Park and unpopulated areas)	1.7%

23 There is further inadequate analysis as to what percentages of total investment in the RTP serve disadvantaged communities (See figure below). We insist such an analysis be conducted prior to the adaptation of the 2018 RTP/SCS to ensure that timely projects are planned for communities. For consideration of historical inequity and investment trends over time we also insist TCAG utilize current expenditure records to perform a retroactive analysis to identify the percentages of roadway investments for the last 20 or 30 years to provide insight to possible inequity and trends of disinvestment that can be addressed through the 2018 RTP Update.²³

94 TCAG should also develop metrics for equitable investments in rural areas for overall electrification of the transit system within the proposed Electric Vehicle Implementation Plan. Currently, disadvantaged unincorporated communities do not have access to reliable charging infrastructure thus making alternative fuel sources effectively out of range. Access to charging stations and alternative fueling infrastructure will be essential in overcoming barriers like range anxiety and inability to fully utilize a ZEV in Tulare County.

Investment Share of RTP Projects

Operation & Maintenance	36%
Transit	22%
Bike/Pedestrian	5%
Total Roadway*	38%
*SR-99 Widening	9%
*Regional Widening	12%
*Regional Interchanges	6%
*Local Road Projects	11%

²³ Section 21.5 (b) (7) "Where prior discriminatory practice or usage tends, on the grounds of race, color, or national origin to exclude individuals from participation in, to deny them the benefits of, or to subject them to discrimination under any program or activity to which this part applies, the applicant or recipient must take affirmative action to remove or overcome the effects of the prior discriminatory practice or usage. Even in the absence of prior discriminatory practice or usage, a recipient in administering a program or activity to which this part applies, is expected to take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin."

95. TCAG concludes that “environmental justice communities will receive more in roadway expenditures than the area that they cover in the County, while also benefiting more from the transit investments in the plan than non-environmental justice communities.” *However, without an analysis based on total population vs total investments that applies to more than road way investment, these conclusions are not robustly founded nor publicly transparent.* Such an analysis can be supported by TCAG’s claim that “TCAG is committed to refining and improving the techniques its uses to measure impacts on Environmental Justice Communities, to better assess the benefits and burdens of the planning process on the various populations within the Tulare Region.”²⁴

Government Code 65080 (B)(1) requires the inclusion in the RTP of a Policy Element which describes transportation issues and identifies and quantifies transportation needs throughout the region. While the Environmental Justice section of the Draft RTP Policy Element states generally that “TCAG seeks to assure that plan benefits and burdens are not inevitable distributed within the region” the Policy Element includes no actual discussion of existing or potential inequalities in transportation infrastructure or service in the County nor access to basic services. The 150,000 residents in Tulare County’s unincorporated regions face unique and heightened barriers to mobility in comparison to other areas other County such as increased carpooling due to inability to maintain a personal vehicle or general lack of physical infrastructure.

96. To further assess equity, we recommend a Near-Term Equity analysis for Environmental Justice Communities- identified in recent best practice literature intending to “supplement the standard, long-range forecasting approach [to analyzing Title VI and EJ] with nearer-term analyses.”²⁵ While these current patterns and conditions may have not been created by TCAG, the RTP and its investments pay a significant role in determining whether they will be maintained, exacerbate, or ameliorate. Recommended steps include:

- Identifying with the participation of affected low income and minority residents, current patterns and conditions relating to an unfair share of the burdens based on health metrics, race, ethnicity, and income
- Identifying contributing factors
- Setting a quantified goal for impacting the factors
- Identifying actions and investments that will be made during the four-year life of the RTP to achieve those goals
- Tracking progress

We believe including other metrics may provide a comprehensive view of equity that allows TCAG to robustly inform short-term and long-term planning and investments to meet the needs of low-income and disadvantaged communities in Tulare County.

²⁴2018 RTP/SCS Environmental Justice Chapter, pg 17.

²⁵ Karner, A. and D. Niemeier (2013). “Civil rights guidance and equity analysis methods for regional transportation plans; a critical review of literature and practice.” Journal of Transport Geography 33: 126-134, pg. 132. “This approach ‘allows for adaptive responses that can help guard against unexpected incremental inequities that lock in larger effects, potentially improving the analytical treatment of race. Conducting these types of analyses would also serve to increase responsiveness to public input.”

V. PEIR - Highway expansion and significant impacts after mitigation

a. Hydrology

Although the Environmental Justice Chapter claims that TCAG “requires that these projects to be financially and environmentally sustainable as to not fall into disrepair or have negative impacts on the surrounding environment following construction.”²⁶ However, with concerns to hydrology the 2018 RTP/SCS contains many impacts that are deemed “significant after mitigation” - particularly due to the addition of 287 new lane miles. This is a concern to our organization because the Kaweah sub basin that provides groundwater to Tulare County is already categorized as a critically overdrafted basin and is extremely vulnerable to impairment of water quality. The expansion of the regional transportation systems will affect the Sub basin’s ability for recharge and anticipates increased stormwater runoff²⁷ and increased likelihood for impairment of water quality. The PEIR identifies the following impacts Significant and unavoidable after mitigation:

- Impact W-1: Violate any water quality standards or waste discharge requirements
- Impact W-2: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lower of the local groundwater table level
- Impact W-3: Substantially alter the existing drainage pattern of a site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site or result in substantial soil erosion or loss of topsoil
- Impact W-4: Substantially alter the existing drainage pattern of a site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site
- Impact W-5: Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff
- Impact W-6: Otherwise substantially degrade water quality
- Impact W-9: Not have sufficient water supplies available to serve the project from existing entitlements and resources, so that new or expanded entitlements would be needed

The Sustainable Groundwater Management Act identifies groundwater contamination as an undesirable result. When considering current communities with trends of water quality impairment and the absence of a static source of funding for operations and maintenance, increasingly impaired water bodies pose a disproportionate risk to unincorporated and majority minority communities and as a result poses a significant environmental injustice. This is not

²⁶ 2018 RTP/SCS Environmental Justice Chapter, pg. 3.

²⁷ Title 23 U.S.C. Section 134. (I) improve the resilience and reliability of the transportation system and reduce or mitigate stormwater impacts of surface transportation
(amended by Moving Ahead for Progress in the 21st Century (MAP-21) and Fixing America's Surface Transportation (FAST) Acts, which apply to RTPs adopted after May 26, 2018)

internally consistent with the policy to “conserve agricultural land, habitat, groundwater recharge area.”

While acknowledging the role of Highways in the current assumptions of the 2018 RTP/SCS, the expansion of highways creates a scenario that reduces GHG emissions at the cost of the extremely vulnerable hydrology of the region. As an alternative to the creation of more lane miles, it is suggested that TCAG sets a metric to triple transit ridership and increase maintenance of existing road infrastructure. Through a specific goal, TCAG will have metrics to gauge the effectiveness and efficacy of its transit policy.

B. air quality

A universal criterion listed in Guidelines for the Selection of RTIP Projects (Table A-4) cities that “capacity increasing highway projects must not degrade air quality. This will be determined through the conformity process”. Title 40 CFR Parts 51 and 93 also state “transportation conformity to a SIP means that on-road transportation activities will not produce new air quality violations, worsen existing violations, or delay timely attainment of the NAAQS.”²⁸ The protection of air quality is a priority of Leadership Counsel and several studies illustrate linkages between capacity-increasing projects and increased emissions resulting from induced driving on feeder streets.

The PEIR also claims that “given the unknown scale of construction over the 24-year period covered by the 2018 RTP/SCS, it is possible that criteria pollutant emission could exceed the annual SJVAPCD significance thresholds listed in Table 4.3-4. In addition, increased dust from construction activities could increase the number of cases of Valley Fever. Consequently, short-term emissions resulting from construction would have a significant impact.” This violates the protections of 23 CFR 450.334(d) that state “Transportation conformity to a SIP means that on-road transportation activities will not produce new air quality violations, worsen existing violations, or delay timely attainment of the NAAQS.”²⁹ It is the obligation of TCAG to ensure that the 2018 does not result in any additional air quality violations with Tulare County having many sensitive regions and higher rates of asthma than state averages.

For example, the projects in the metropolitan areas of Tulare, Visalia, and Porterville may have potential that may affect the nearby EJ TAZs of West Goshen, Matheny Tract, Soultis Tract, Lone Oak Tract, East Tulare Villa, Poplar, Woodville, Townville, Decor, Terra Bella, and Strathmore.

V. Recommended Changes to Public Participation Plan

a. Sustained, Targeted Outreach to Meet Identify and Address Needs of Low-Income and Disadvantaged Communities

TCAG’s Public Participation Plan must be developed “in consultation with all interested parties” and must, among other things, “at a minimum, describe explicit procedures, strategies, and desired outcomes for . . . *seeking out and considering the needs of . . . low-income and minority households.*” We applaud the robust round of outreach at 71 events during the scenario

²⁸ CTC RTP Guidelines for MPOs, p. 107.

²⁹ “Transportation conformity to a SIP means that on-road transportation activities will not produce new air quality violations, worsen existing violations, or delay timely attainment of the NAAQS.” CTC RTP Guidelines for MPOs, p. 107”

selection process. However, considering this initial round of. However statute also requires “periodically reviewing the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process.”³⁰ As such, we recommend that TCAG should include policies in the Public Participation Plan to provide follow-up meetings to communities involved in the initial scenario selection process and to translate all key materials to languages other than English in a timely fashion in order to “provide the public with the information and tools necessary to provide a clear understanding of the issues and policy choices.”³¹

A recommendation that affirms TCAG’s commitment to “ensure the full and fair participation by all potentially affected communities in the transportation decision-making process” can be incorporated as follows:

Goal: Increase opportunities for public involvement in transportation planning processes.

Strategy: Provide varied opportunities for public review and input and be responsive to that input.

Procedures:

- Provide timely public notice of meetings.
- Conduct or attend project/process focused meetings outside the usual monthly TCAG Board meeting to gather public input.
- Work with other public agencies and organizations to gather public input regarding transportation processes and issues.
- Respond to public input in a professional, timely and accurate manner
- Conduct follow-up meetings with communities participating in initial scenario selection process

Furthermore, despite claims that TCAG does have translation software, not even the executive summary of the 2018 RTP/SCS update is not available in another language other than English.³² According to American Community Survey, 13.90% of the population of Tulare County is affected by Language Isolation. For EJ TAZs, the percentage increases to 21%. Translated from percentages, this totals 63,111 and 31,821 residents in the County at large and in EJ TAZs that are excluded from full participation by lack of informational material. However, when extrapolated, EJ TAZs’ total population is roughly one-third of the entire county (pg. 5). We strongly urge TCAG change its Public Participation Plan to include translated documents and/or of factsheets at least available online.

³⁰ 23 C.F.R. § 450.316 (a) (1) (x)

³¹ SB 375 § 4. 65080 (b)(2).

³² 49 CFR § 21.5 (b) (1) (vii) Deny a person an opportunity to participate in the program through the provision of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program.

Thank you for the opportunity to provide comment on the 2018 RTP/SCS Update. TCAG staff may direct any comments or questions to phernandez@leadershipcounsel.org or (559) 816-5303.

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Dated June 26, 2018

Number	Response
1	<p>The RTP/SCS does identify and include rural transportation issues as a regional concern, consistent with the RTP Guidelines. Not only do the RTP/SCS goals and policies to support communities in developing walkable, bikeable and transit-ready neighborhoods for people of all levels of income and various availability of resources (Policy Element page 2-4), but TCAG has consistently demonstrated this with the innovative and dedicated funding of complete streets plans, active transportation projects and other improvements in Environmental Justice Communities, a disproportionately large amount going to rural, unincorporated communities. For example, according to the latest census, over two thirds of all economically disadvantaged households are located within incorporated cities. However, all of the TCAG funded complete streets studies since the program has begun, have been provided exclusively in unincorporated communities. Based on TCAG analysis, approximately 80% of all active transportation program funding from state grants have gone to unincorporated communities. All of TCAG's farm to market road funding, since the program has begun has been in unincorporated areas. Measure R has directed significant, new funding to all communities for increased transit, bike and pedestrian projects and road rehabilitation through the local program. State Route 99 widening in the future is proposed to pass through Tipton, Pixley and Earlimart. State Route 65 widening is proposed to pass through Terra Bella and Ducor. In both cases, the considerable expense to improve the principal transportation connection in these communities, which is what is used by existing and potential transit to serve these communities, will provide increased economic development opportunities and access to goods and services. However, regional projects benefit all communities, populations and residents in the region, whether they are accessed via vehicle, transit or active transportation. By continuing to provide regional projects in the RTP/SCS, rural and disadvantaged communities are benefitted along with all of the others.</p>
2	<p>The RTP/SCS does meet Government Code and RTP Guidelines requirements. The needs of disadvantaged unincorporated and rural communities are considered in numerous places, including but not limited to the following: The RTP/SCS does identify and include rural transportation issues as a regional concern. Not only do the RTP/SCS goals and policies to support communities in developing walkable, bikeable and transit-ready neighborhoods for people of all levels of income and various availability of resources (Policy Element page 2-4), but TCAG has consistently demonstrated this with the innovative and dedicated funding of complete streets plans, active transportation projects and other improvements in Environmental Justice Communities, a disproportionately large amount going to rural, unincorporated communities. For example, according to the latest census, over two thirds of all economically disadvantaged households are located within incorporated cities. However, all of the TCAG funded complete streets studies since the program has begun, have been provided exclusively in unincorporated communities. Based on TCAG analysis, approximately 80% of all active transportation program funding from state grants have gone to unincorporated communities. All of TCAG's farm to market road funding, since the program has begun has been in unincorporated areas. Measure R has directed significant, new funding to all communities for increased transit, bike and pedestrian projects and road rehabilitation through the local program. State Route 99 widening in the future is proposed to pass through Tipton, Pixley and Earlimart. State Route 65 widening is proposed to pass through Terra Bella and Ducor. In both cases, the considerable expense to improve the principal transportation connection in these communities, which is what is used by existing and potential transit to serve these communities, will provide increased economic development opportunities and access to goods and services. However, regional projects benefit all communities, populations and residents in the region, whether they are accessed via vehicle, transit or active transportation. By continuing to provide regional projects in the RTP/SCS, rural and disadvantaged communities are benefitted along with all of the others. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.</p>

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3	In preparing the RTP/SCS and associated documents, TCAG used all data, information and policy direction contained in all of the RTP/SCS appendices. This includes Complete Streets Studies, the Regional Active Transportation Plan, the Long Range Transit Plan, the Cross Valley Corridor Plan, all City and County General Plans, Infrastructure Plans, Transit Development Plans, Short Range Transit Plans, Goods Movement Studies, Congestion Management and the Environmental Impact Report. Funding for projects is discussed on page B-29 and B-86 of the Action Element and throughout the entire Financial Element of the RTP/SCS.
4	TCAG agrees with the encouragement to complete the remaining Complete Streets Studies for the remaining unincorporated communities, as evidenced by the RTP/SCS's goals, policies, priorities, plans, studies and other appendices that indicate as much and the disproportionately high amount of funding towards unincorporated communities over the vast majority of disadvantaged residents living in incorporated cities. The ability to complete them all will depend on the availability of funding to do so. TCAG recommends that the studies avoid unnecessary analysis and focus only on the information needed to get projects constructed there. This will allow the region to expedite delivery of the studies and avoid delays.
5	Increasing transit ridership, active transportation via improved safety and operational measures, the provision of active transportation infrastructure and innovative solutions to rural barriers are already major components of the 2018 RTP/SCS as evidenced by, among other features, goals, objectives and policies contained on pages A-3 through A-6 of the Policy Element; the Regional Transit Plan; the Regional Active Transportation Plan; The Cross Valley Corridor Plan; the Complete Streets Studies; and the disproportionately high number of Safe Routes to School Projects directed towards unincorporated communities over incorporated communities where the majority of disadvantaged residents in the region reside.
6	These "themes" have been incorporated into the RTP/SCS from the beginning and continue to be found throughout the Policy Element (pages A-3 to A-6 and A-8 for transit and active transportation, A-7 for Safety, A-11 to A-12 for both, A-13 for climate change issues, A-14 for health, A-17 for Environmental Justice including inclusion and input, and page A-6 for sustainability issues. Community outreach was done in accordance with state and federal requirements, and extra outreach conducted through an unprecedented number of community workshops, events and tribal outreach efforts, resulting in four times the amount of input received from any previous RTP/SCS effort.
7	Although SB-375 does not define the terms clear, action-oriented, and pragmatic, and the RTP Guidelines give regions considerable discretion in crafting policies, The RTP/SCS is pragmatic (evidenced by the fiscal constraint), action-oriented (evidenced by the Action and Finance Elements, as well as 48 implementation appendices) and meets the needs of disadvantaged communities (as evidenced by numerous policy and implementation provisions throughout the plan, the elements and the 48 implementation appendices). Not only do the RTP/SCS goals and policies to support communities in developing walkable, bikeable and transit-ready neighborhoods for people of all levels of income and various availability of resources (Policy Element page 2-4), but TCAG has consistently demonstrated this with the innovative and dedicated funding of complete streets plans, active transportation projects and other improvements in Environmental Justice Communities, a disproportionately large amount going to rural, unincorporated communities. For example, according to the latest census, over two thirds of all economically disadvantaged households are located within incorporated cities. However, all of the TCAG funded complete streets studies since the program has begun, have been provided exclusively in unincorporated communities. Based on our analysis, approximately 80% of all active transportation program funding from state grants have gone to unincorporated communities. All of TCAG's farm to market road funding, since the program has begun has been in unincorporated areas. Measure R has directed significant, new funding to all communities for increased transit, bike and pedestrian projects and road rehabilitation through the local program. State Route 99 widening in the future is proposed to pass through Tipton, Pixley and Earlimart. State Route 65 widening is proposed to pass through Terra Bella and Ducor. In both cases, the considerable expense

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	to improve the principal transportation connection in these communities, which is what is used by existing and potential transit to serve these communities, will provide increased economic development opportunities and access to goods and services. However, regional projects benefit all communities, populations and residents in the region, whether they are accessed via vehicle, transit or active transportation. By continuing to provide regional projects in the RTP/SCS, rural and disadvantaged communities are benefitted along with all of the others. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.
8	The RTP Guidelines give regions considerable discretion in crafting policies and the proposed policies in the policy element give clear guidance to goals, objectives and policies that meet state, federal, regional and local regulations and expectations. Since TCAG does not have authority over local land use decisions and does not directly implement transportation projects, TCAG cannot mandate policies that local agencies and transportation project sponsors must implement. It is therefore in the purview of TCAG to recommend policies and projects, not mandate them. In recommending policies projects, directing funding and timing, TCAG is still "action-oriented" both in the short and long term, serving all agencies and populations.
9	TCAG will amend the language in the Final RTP/SCS to reflect this suggestion.
10	Guaranteeing the availability of outside funding that TCAG has no control to deliver a predisposed number of plans is not keeping with the goal of being "pragmatic or action-oriented" but rather may raise false expectations in the minds of residents of disadvantaged communities. TCAG will continue to partner with agencies and advocacy groups to pursue grants and other funding to expedite the completion of Complete Streets Plans, subject to funding availability.
11	TCAG will amend the language in the Final RTP/SCS to reflect this suggestion.
12	By directing funding for Complete Streets Studies, Feasibility Studies and Community and Neighborhood plans according to proposed policies and actions, and based on extensive past practice, when funding has been available for such tasks, there is no need to front load the funding. When funding is available, it is already going to those types of projects.
13	Performance measures for measuring progress in achieving equitable access can be found on Table A-5 of the Action Element.
14	Guaranteeing the availability of outside funding that TCAG has no control to deliver a predisposed number of plans is not keeping with the goal of being "pragmatic or action-oriented" but rather may raise false expectations in the minds of residents of disadvantaged communities. TCAG will continue to partner with agencies and advocacy groups to pursue grants and other funding to expedite the completion of barrier studies, subject to funding availability.
15	TCAG will amend the language in the Final RTP/SCS to reflect this suggestion.
16	TCAG does not have jurisdiction over local agency decision making processes needed to maintain a minimum Pavement Condition Index (PCI), and could not guarantee a predefined outcome over a process it does not have control over.
17	In addition to addressing safety issues throughout the entire RTP/SCS for regional and local projects, Page A-6 and A-7 of the Policy Element contain objectives that address safety and the fair and equitable transportation improvements throughout the region.
18	In addition to addressing future local and regional road and circulation needs throughout the entire RTP/SCS, page A-7 of the Policy Element contains an objective that addresses the fair and equitable transportation improvements throughout the region.
19	Disadvantaged communities existing in all of the incorporated cities as well as, to a lesser degree, the unincorporated county. According to the latest census, approximately 2/3 of economically disadvantaged communities are within the incorporated cities. Regional projects benefit all residents of the region, regardless of economic or other standing. As such, every project, whether it be regional, or within either an incorporated city, or the unincorporated county, benefits a disadvantaged community. In concept and in reality, disadvantaged communities are, by default, the priority of the RTP/SCS and of TCAG. The RTP/SCS's

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	Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.
20	Disadvantaged communities existing in all of the incorporated cities as well as, to a lesser degree, the unincorporated county. According to the latest census, approximately 2/3 of economically disadvantaged communities are within the incorporated cities. Regional projects benefit all residents of the region, regardless of economic or other standing. As such, every project, whether it be regional, or within either an incorporated city, or the unincorporated county, benefits a disadvantaged community. In concept and in reality, disadvantaged communities are, by default, the priority of the RTP/SCS and of TCAG. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.
21	TCAG will amend the language in the Final RTP/SCS to reflect this suggestion.
22	The RTP Roundtable is made up of members from every TCAG agency (each agency containing at least one disadvantaged community), as well as advocacy groups that have the needs of disadvantaged communities in mind. As such, this Roundtable functions successfully as an Environmental Justice Advisory Committee to the TCAG Board in matters relating to regional planning in the region. This is evidenced by the collaborative nature in which TCAG conducted the business of the Roundtable and incorporated suggestions of advocacy groups throughout the process. It lead to many discussions and changes to RTP/SCS policies, outreach and practices and was so successful, that it eliminated the need to consider the formation of any other group that would simply duplicate efforts. Roundtable suggestions were made part of the current draft of the RTP/SCS that is being considered for approval. It is expected that the RTP Roundtable would continue to function with future RTP/SCS cycles and continue to address issues involving environmental justice and disadvantaged communities. Also, please note that the Environmental Justice Report demonstrates how the RTP/SCS fully complies with Title VI requirements.
23	TCAG will amend the language of the Final RTP/SCS to reflect this suggestion.
24	Through the CEQA process for individual transportation projects, all options are on the table for discussion when considering potential mitigation measures for transportation projects. To the extent that transit would mitigate a significant and is a feasible mitigation measure, it would be considered during project-level CEQA reviews.. No change in the policies is necessary to make this happen.
25	When today's disadvantaged communities were first built, they were not disadvantaged communities and therefore were not constructed with the intended or unintended consequence of discriminating against anyone. Since regional projects benefit all communities and populations, and there are disadvantaged communities in every incorporated city and the county, all of our historic TCAG projects have been for the benefit of a disadvantaged community. Future needs for low-income and disadvantaged communities are properly studied in the RTP/SCS and the 48 appendices, including in complete streets plans for unincorporated county communities. As TCAG continues to implement its fair and equitable policies for transportation implementation, continued equity analysis will take place as part of future studies. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.
26	Funding for public outreach is provided by the Federal Government as part of the RTP/SCS process. Not only did TCAG meet all state and federal requirements for outreach, but TCAG far exceeded those requirements by conducting extensive Tribal and Disadvantaged community outreach. By partnering with CSET to conduct 71 community workshops and events, TCAG received four times the amount of feedback it has ever received in an RTP/SCS effort. TCAG also worked with the Leadership Counsel for Justice and Accountability to provide additional outreach to disadvantaged residents beyond what was required.
27	All notices, communications and outreach display items were available in both English and Spanish throughout the process, even

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	though there is no state or federal requirement to do so for outreach. Translation staff and/or services were available at all of our outreach events. All social media posts, which generated the majority of RTP/SCS comments, were done in both English and Spanish, with an equal amount of advertising funding going to each language in boosting the posts. The final workshop, held in the evening, was conducted entirely in Spanish by TCAG staff. Funding for outreach is provided by the Federal Government for RTP/SCS processes and is not sufficient to provide additional services beyond what was done with this RTP/SCS creation.
28	These responses to comments are TCAG's approach to responding to oral and written comments with a transparent process for consideration and incorporation in planning updates before the TCAG Board.
29	Translation has been available in all TCAG outreach events. The last RTP/SCS workshop was held in the evening and was accessible to low-income residents, as evidenced by the attendees that came from four different disadvantaged communities outside of Visalia.
30	The RTP Roundtable received regular updates and opportunities for comment throughout the entire process, first over modeling issues, second over development scenario creation, third over development scenario selection, fourth over outreach strategies, fifth over the Draft RTP/SCS and sixth over progress at the end of the project.
31	TCAG and its member agencies have been big supporters of CalVans. TCAG provides advertising dollars annually and the cities of Visalia, Tulare, and Porterville provide generous subsidies for new CalVans members. https://calvans.org/cost-calculators . It reaches numerous rural disadvantaged communities and connects them with employment in the agricultural industry. Flexible micro transit is a new concept currently being developed as a future pilot program in the North County area. If successful it could be implemented in other parts of the region. It is likely to be a part of the next RTP/SCS effort.
32	TCAG will amend the language in the Final RTP/SCS to reflect this suggestion.
33	Although TCAG supports state efforts to dramatically improve opportunities for transit and active transportation, it cannot guarantee an outcome for processes that it does not control. Although TCAG is making significant efforts to provide additional active transportation facilities, it cannot force people to use those facilities and therefore control the outcome.
34	This has been done in the Policy Element, Action Element, Finance Element, Regional Active Transportation Plan, Regional Transit Plan, Cross Valley Corridor Plan and all of the Complete Streets Studies that are contained in the Appendices. Since it is already a firm policy in the RTP/SCS, it is expected to continue to be a priority in the future.
35	Active transportation outreach is done in accordance with state and federal requirements. Additional translation services are provided as funding and resources are available.
36	N/A
37	TCAG will amend the language in the Final RTP/SCS to reflect this suggestion.
38	TCAG will amend the language in the Final RTP/SCS to reflect this suggestion.
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45	Pages A-5 and A-7 contain policies to this effect, promoting safety.
46	Air Quality and safety analysis are part of the Environmental Review process that is done for all highway expansion projects.
47	TCAG cannot change the federal and state constraints governing how federal and state transportation funding is spent. Each

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	<p>federal and state funding source must be used in accordance with the dictates of its associated policies, procedures and audits. Also, Measure R projects were decided upon by the will of the region's voters who passed the sales tax, are governed by an oversight committee. However, there is no denial of, reduction in, or significant delay in the receipt of benefits by minority (which make up a 70% majority in Tulare County) and low-income populations (which are found in every incorporated and unincorporated community in the region) because all regional projects benefit all populations, and all local project benefit the disadvantaged residents located within their jurisdictions. In the unincorporated county, the remaining funding has been disproportionately directed to rural disadvantaged communities (Safe Routes to School, Active Transportation Program, Farm to Market, etc.) Additional evidence is available on tables B-82 and B-83 of the Action Element which show only a few highway widenings in total, and those are pushed to the end of the time frame in question, giving the effect of front loading the types of other projects that the comment suggests. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.</p>
48	<p>Potential human health and other environmental effects are analyzed in all environmental reviews conducted for transportation projects. However, there is no denial of, reduction in, or significant delay in the receipt of benefits by minority (which make up a 70% majority in Tulare County) and low-income populations (which are found in every incorporated and unincorporated community in the region) because all regional projects benefit all populations, and all local project benefit the disadvantaged residents located within their jurisdictions. In the unincorporated county, the remaining funding has been disproportionately directed to rural disadvantaged communities (Safe Routes to School, Active Transportation Program, Farm to Market, etc.) Additional evidence is available on tables B-82 and B-83 of the Action Element which show only a few highway widenings in total, and those are pushed to the end of the time frame in question, giving the effect of front loading the types of other projects that the disadvantaged communities are saying that they want. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.</p>
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50	<p>The RTP/SCS has a time horizon extending to the year 2042. The RTP/SCS Action Element describes the implementation of projects proposed in the RTP/SCS. However, there is no denial of, reduction in, or significant delay in the receipt of benefits by minority (which make up a 70% majority in Tulare County) and low-income populations (which are found in every incorporated and unincorporated community in the region) because all regional projects benefit all populations, and all local project benefit the disadvantaged residents located within their jurisdictions. In the unincorporated county, the remaining funding has been disproportionately directed to rural disadvantaged communities (Safe Routes to School, Active Transportation Program, Farm to Market, etc.) Additional evidence is available on tables B-82 and B-83 of the Action Element which show only a few highway</p>

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52	The Action Element does contain programs and actions necessary to implement the plan and assigns implementation responsibilities.
53	The RTP/SCS, as currently proposed, is action oriented and pragmatic. Although SB-375 does not define the terms clear, action-oriented, and pragmatic, and the RTP Guidelines give regions considerable discretion in crafting policies, The RTP/SCS is pragmatic (evidenced by the fiscal constraint on it's vision), action-oriented (evidenced by the Action and Finance Elements, as well as 48 implementation appendices) and meets the needs of disadvantaged communities (as evidenced by numerous policy and implementation provisions throughout the plan, the elements and the 48 implementation appendices).
54	The RTP/SCS's level of detail for timelines does meet Government Code Section 65080 requirements. For example, Tables A-15, A-16 and A-18 of the Action Element shows years for which certain phases of proposed projects would take place.
55	Since Regional Projects benefit all populations, there are disadvantaged populations in all communities within Tulare County and there is a disproportionate amount of discretionary funding being targeted for rural communities, the proposed time frames are adequate to meet the needs of disadvantaged residents in the region. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.
56	TCAG agrees that the well-timed implementation of proposed policies will help TCAG meet state goals. Since Regional Projects benefit all populations, there are disadvantaged populations in all communities within Tulare County and there is a disproportionate amount of discretionary funding being targeted for rural communities, it cannot be verified that there have been any historical, current or potential inequities that involve TCAG or regional transportation planning. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.
57	The commenter's opinion is noted. The term "small" and "inexpensive" are relative terms. Whether or not the proposed projects have more impact on public safety is more a matter of the type of project, than the size of the community. For example, a studies show that a roundabout (such as the ones being constructed in several incorporated cities in the region) are far more safer for pedestrians crossing streets than crosswalks, strobe lights, and other improvements that might be considered in rural communities.
58	Policies on page A-3, A-4, A-5 and A-6 of the Policy Element contain provisions for health, safety, deficient infrastructure, and equity. Affirmative actions to address these issues is contained in the Action Element and the 48 RTP/SCS appendices. The

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	RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.
59	Tables A-15, A-16 and A-18 of the Action Element shows years for which certain phases of proposed projects would take place. There is no denial of, reduction in, or significant delay in the receipt of benefits by minority (which make up a 70% majority in Tulare County) and low-income populations (which are found in every incorporated and unincorporated community in the region) because all regional projects benefit all populations, and all local project benefit the disadvantaged residents located within their jurisdictions. In the unincorporated county, the remaining funding has been disproportionately directed to rural disadvantaged communities (Safe Routes to School, Active Transportation Program, Farm to Market, etc.) Additional evidence is available on tables B-82 and B-83 of the Action Element which show only a few highway widenings in total, and those are pushed to the end of the time frame in question, giving the effect of front loading the types of other projects that the disadvantaged communities are saying that they want. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.
60	Since Regional Projects benefit all populations, there are disadvantaged populations in all communities within Tulare County and there is a disproportionate amount of discretionary funding being targeted for rural communities, the proposed project lists and time schedules meet the suggestion for a description of specific investments. The specific detailed timelines for disadvantaged community projects recommended by the comment are not required by federal or state transportation planning law or guidance.
61	Since Regional Projects benefit all populations, there are disadvantaged populations in all communities within Tulare County and there is a disproportionate amount of discretionary funding being targeted for rural communities, the proposed projects contained in the RTP/SCS facilitate addressing the needs of disadvantaged communities. Potential significant environmental effects are discussed in the EIR, and feasible mitigation measures to reduce them will be adopted at the end of the CEQA process as part of the CEQA findings of fact.
62	Page A-7 of the Policy Element has a policy that addresses a project ranking system.
63	Pages A-3 through A-18 of the Policy Element contain policies that promote funding for healthy, equitable and sustainable communities and the transportation choices that make them possible.
64	According to numerous transit surveys, described in the RTP Regional Transit Plan and various Transit Plan Appendices, the biggest factors that determine transit ridership have to do with convenience and coverage and not physical barriers located in certain communities. This is also reflected in the survey results done as part of the RTP/SCS outreach. Having lower transit ridership than that state average has to do with the Tulare County region being geographically large, rural and sparsely populated compared to California's mega city regions. To compare the Tulare County Region's transit to state averages that include larger cities is misleading and not useful in identifying Tulare County transit needs.
65	TCAG agrees with this suggestion in concept and has launched a pilot program in the north county to study it and test out rural micro transit. If effective, it could lead to micro transit being implemented in other rural areas of the region. The existing policies of the RTP/SCS are adequate to address transit needs as evidenced by TCAG's ability to get funding for and initiate the pilot program.
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67	TCAG did explicitly consider the input of the public participation process in developing RTP/SCS. Pages A-3 through A-18 of the Policy Element contain policies that promote transit, overcoming barriers, and supporting mode choice. Meaningful actions to improve transit have taken place over the last ten years, and ridership has nearly doubled as a result. However, every transit agency in the region is currently failing to meet federal standards for farebox recovery, despite the increases in ridership. There may not be a correlation between ridership and farebox if the costs for providing transit continue to increase.
68	The recommended alternative is infeasible. With the passage of Measure R, and the significant provisions for transit and active transportation funding it contains, the requested shift has already happened to a large extent. However, further major shifts are not currently feasible, since TCAG does not control federal and state funding spending requirements and priorities. Federal and state funding pots cannot be mixed, or redirected in a manner that violates federal and state funding source constraints. They are carefully planned and scrutinized by auditors and any unauthorized spending or redirecting will lead to a loss of funding. . Similarly, Measure R projects were decided by the voters of the Sales Tax Measure and are governed by an oversight committee to make sure that TCAG does not redirect funds to other priorities. That being said, according to Tables B-82 and B-83, there are few widening projects proposed in the planning horizon of the RTP/SCS, and what few that exist have been pushed to the end of the timeline, revealing a focus on investments that meet regional health, equity and sustainability goals already in place.
69	Environmental impacts associated with the RTP/SCS are discussed in the EIR.
70	The RTP/SCS does invest adequately in active transportation and transit, and meets applicable federal transportation planning legal requirements for these modes. Federal and state funding pots cannot be mixed or redirected in a manner that violates federal and state funding source constraints . They are carefully planned and scrutinized by auditors and any unauthorized spending or redirecting will lead to a loss of funding. Similarly, Measure R projects were decided by the voters of the Sales Tax Measure and are governed by an oversight committee to make sure that TCAG does not redirect funds to other priorities. That being said, according to Tables B-82 and B-83, there are few widening projects proposed in the planning horizon of the RTP/SCS, and what few that exist have been pushed to the end of the timeline, revealing a focus on investments that meet regional health, equity and sustainability goals already in place. The RTP/SCS does identify and include rural transportation issues as a regional concern. Not only do the RTP/SCS goals and policies to support communities in developing walkable, bikeable and transit-ready neighborhoods for people of all levels of income and various availability of resources (Policy Element page 2-4), but TCAG has consistently demonstrated this with the innovative and dedicated funding of complete streets plans, active transportation projects and other improvements in Environmental Justice Communities, a disproportionately large amount going to rural, unincorporated communities. For example, according to the latest census, over two thirds of all economically disadvantaged households are located within incorporated cities. However, all of the TCAG funded complete streets studies since the program has begun, have been provided exclusively in unincorporated communities. Based on our analysis, approximately 80% of all active transportation program funding from state grants have gone to unincorporated communities. All of TCAG's farm to market road funding, since the program has begun has been in unincorporated areas. Measure R has directed significant, new funding to all communities for increased transit, bike and pedestrian projects and road rehabilitation through the local program. State Route 99 widening in the future is proposed to pass through Tipton, Pixley and Earlimart. State Route 65 widening is proposed to pass through Terra Bella and Ducor. In both cases, the considerable expense to improve the principal transportation connection in these communities, which is what is used by existing and potential transit to serve these communities, will provide increased economic development opportunities and access to goods and services. However, regional projects benefit all communities, populations and residents in the region, whether they are accessed via vehicle, transit or active transportation. By continuing to provide regional projects in the RTP/SCS, rural and disadvantaged communities are benefitted along with all of the others. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged

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	communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.
71	The recommended alternative is infeasible. There is no imbalance in the RTP/SCS related to disadvantaged communities. All regional projects benefit all populations. Disadvantaged communities exist in all of the region's communities, therefore, any local project, in any given location is going to benefit a disadvantaged community. All jurisdictions have people that do not have vehicles, whether it be by choice, or otherwise. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.
72	Page A-13 has a policy to maintain or improve the existing transportation system condition and efficiency. No further policies are necessary to address street maintenance.
73	Federal and state funding pots cannot be mixed or redirected in a manner that violates federal and state funding source constraints. They are carefully planned and scrutinized by auditors and any unauthorized spending or redirecting will lead to a loss of funding. Similarly, Measure R projects were decided by the voters of the Sales Tax Measure and are governed by an oversight committee to make sure that TCAG does not redirect funds to other priorities. That being said, according to Tables B-82 and B-83, there really are very few many widening projects proposed in the planning horizon of the RTP/SCS, and what few that exist have been pushed to the end of the timeline, revealing a focus on investments that meet regional health, equity and sustainability goals already in place. Measure R included local program funding to maintain existing roads, a significant amount of which is done directly in disadvantaged communities, and another amount of which is used by residents of disadvantaged communities, providing them benefit.
74	Comment Noted
75	There is no known study that scientifically links "pedestrian danger" with road maintenance condition. Typically, unrepaired roads result in lower vehicle speeds that in turn result in fewer pedestrian related injuries or fatalities.
76	Comment Noted
77	Without revising the Draft RTP/SCS, the maintenance needs of existing roads and active and public transportation infrastructure are being pursued aggressively, consistent with state and federal constraints on funding sources. Local sales tax measure money is being directed to maintenance to the maximum extent possible under guidelines imposed by the voters of the region that are watched by a regional oversight committee. Since every jurisdiction in the region has disadvantaged populations, it can be said that every possible means to provide road maintenance for disadvantaged communities is being pursued aggressively and that there are not currently any other possible options to consider.
78	Some but not all roadway expansion induces more driving demand. Of course it would depend on the definition of roadway expansion and the definition of driving demand. For example, Hermosa Street in Lindsay was widened to four lanes in the 1970's (or 1980's) but does not have significant traffic on it today, nor has the City of Lindsay experience much growth since then. State Route 65 near Lindsay was widened to four lanes at about the same time but continues to have only sporadic traffic and operates at a LOS A for most of the day, if not all of the day. Conversely, Spruce Avenue has not been widened at all since it was constructed, and has had very significant increases in vehicular traffic in recent years. Other factors besides widening play into whether or not there is an increase of traffic on any given road.
79	Actually, Tables on page B-82 and B-83 of the Action Element reveal very few capacity increasing projects associated with the 2018 RTP/SCS and they are mostly deferred to later years.
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81	The RTP/SCS transit provisions meet federal and state transportation planning requirements. Although TCAG agrees that transit systems are useful to individuals who are unable to drive, in the TCAG region there is no evidence that transit has had more than a small impact on the regional efforts to reduce traffic congestion, VMT or vehicle emissions. .
82	The recommended alternative is infeasible. Federal and state funding pots cannot be mixed or redirected in a manner that violates federal and state funding source constraints. They are carefully planned and scrutinized by auditors and any unauthorized spending or redirecting will lead to a loss of funding. Similarly, Measure R projects were decided by the voters of the Sales Tax Measure and are governed by an oversight committee to make sure that TCAG does not redirect funds to other priorities. That being said, according to Tables B-82 and B-83, there are few widening projects proposed in the planning horizon of the RTP/SCS, and what few that exist have been pushed to the end of the timeline, revealing a focus on investments that meet regional health, equity and sustainability goals already in place. Disadvantaged communities exist in all of the region's communities, therefore, any local project, in any given location is going to benefit a disadvantaged community. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.
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84	TCAG agrees with this suggestion in concept and has launched a pilot program in the north county to study it and test out rural micro transit. If effective, it could lead to micro transit being implemented in other rural areas of the region. The existing policies of the RTP/SCS are adequate to address transit needs as evidenced by TCAG's ability to get funding for and initiate the pilot program.
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87	Given the disproportionate direction of funding to rural disadvantaged communities within the region, it is questionable whether or not said disparities in transportation investment currently exist, but pages A-3 through A-13 of the Policy Element contain numerous policies supporting smart growth. TCAG went through extensive efforts to make the SCS consistent with all local General Plans, and the RTP/SCS provisions for smart growth are internally consistent.
88	The RTP Roundtable is made up of members from every TCAG agency (each agency containing at least one disadvantaged community), as well as advocacy groups that have the needs of disadvantaged communities in mind. As such, this Roundtable functions successfully as an Environmental Justice Advisory Committee to the TCAG Board in matters relating to regional planning in the region. This is evidenced by the collaborative nature in which TCAG conducted the business of the Roundtable and incorporated suggestions of advocacy groups throughout the process. It lead to many discussions and changes to RTP/SCS policies, outreach and practices and was so successful, that it eliminated the need to consider the formation of any other group that would simply duplicate efforts. Roundtable suggestions were made part of the current draft of the RTP/SCS that is being considered for approval. It is expected that the RTP Roundtable would continue to function with future RTP/SCS cycles and continue to address issues involving environmental justice and disadvantaged communities. In future RTP Cycles, the RTP Roundtable will be able to continue to discuss "fair share" and other topics associated with environmental justice.
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91	TCAG does need assessments and outreach, inclusive of disadvantaged communities, in an on-going way as part of all its major programs. For example, the Regional Active Transportation Plan, Long Range Transit Plan and Measure R Expenditure Plan all contain this kind of needs assessment. These assessments are considered as part of the development of the RTP/SCS. Furthermore TCAG has funded several complete streets plans and supported the development of community plans in disadvantaged communities.																
92	In response to this comment, the Environmental Justice Report was updated and enhanced to include population based analysis. The below figure from the updated report shows that EJ communities will be receiving a larger share or benefit of roadway projects than their share of county population.																
<p>Figure EJ-7</p> <table border="1"> <thead> <tr> <th colspan="2"><i>Share of RTP Roadway Projects in EJ Communities</i></th></tr> </thead> <tbody> <tr> <td>Total Distance of RTP Road Projects (Lane miles)</td><td>287</td></tr> <tr> <td>Total Distance of Road Projects within EJ Communities (Lane miles)</td><td>156</td></tr> <tr> <td>Share of Roadway Projects within EJ Communities</td><td>54.3%</td></tr> <tr> <td>Share of Roadway Projects within .5 miles of EJ Communities</td><td>62.7%</td></tr> <tr> <td>Share of Roadway Projects within 1 mile of EJ Communities</td><td>72.1%</td></tr> <tr> <td>Average Year of Project Delivery (EJ Areas)</td><td>2028.7</td></tr> <tr> <td>Average Year of Project Delivery (non EJ Areas)</td><td>2029.2</td></tr> </tbody> </table>		<i>Share of RTP Roadway Projects in EJ Communities</i>		Total Distance of RTP Road Projects (Lane miles)	287	Total Distance of Road Projects within EJ Communities (Lane miles)	156	Share of Roadway Projects within EJ Communities	54.3%	Share of Roadway Projects within .5 miles of EJ Communities	62.7%	Share of Roadway Projects within 1 mile of EJ Communities	72.1%	Average Year of Project Delivery (EJ Areas)	2028.7	Average Year of Project Delivery (non EJ Areas)	2029.2
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	Share of RTP Road Project Investment (non EJ Areas) (\$)	31.1%																											
	EJ Communities Share of Population in Region	33.4%																											
93	<p>The Environmental Justice Chapter was updated and enhanced to include a comparison of mode investments between the 2014 RTP/SCS and 2018 RTP/SCS. The below figure from the updated report shows that, compared to the 2014 RTP/SCS, a significant and increased share of investments in the RTP/SCS for transit and active transportation projects will further benefit the residents of environmental justice communities, which rely on these modes more than non-environmental justice communities. Data do not exist to perform a 20-year retroactive analysis as suggested by the comment, nor is such an analysis required by federal or state transportation planning law or guidelines.</p> <p>Figure EJ - 8</p> <table> <tr> <th><i>Investment Share of RTP Projects</i></th><th><i>2018 RTP</i></th><th><i>2014 RTP</i></th></tr> <tr> <td>Roads and Highways Total</td><td>71.7%</td><td>86.8%</td></tr> <tr> <td>Highway Capacity Expansion</td><td>25.6%</td><td>35.2%</td></tr> <tr> <td>Local Roadway Expansion</td><td>10.5%</td><td>16.0%</td></tr> <tr> <td>Road and Highway Maintenance</td><td>35.6%</td><td>35.6%</td></tr> <tr> <td>Transit Total</td><td>21.7%</td><td>12.8%</td></tr> <tr> <td>Active Transportation Total</td><td>4.7%</td><td>0.4%</td></tr> <tr> <td>Other (ITS)</td><td>1.9%</td><td>0%</td></tr> <tr> <td>Total Investment</td><td>\$5.731 Billion</td><td>\$5.175 Billion</td></tr> </table>		<i>Investment Share of RTP Projects</i>	<i>2018 RTP</i>	<i>2014 RTP</i>	Roads and Highways Total	71.7%	86.8%	Highway Capacity Expansion	25.6%	35.2%	Local Roadway Expansion	10.5%	16.0%	Road and Highway Maintenance	35.6%	35.6%	Transit Total	21.7%	12.8%	Active Transportation Total	4.7%	0.4%	Other (ITS)	1.9%	0%	Total Investment	\$5.731 Billion	\$5.175 Billion
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94	<p>The RTP Roundtable is made up of members from every TCAG agency (each agency containing at least one disadvantaged community), as well as advocacy groups that have the needs of disadvantaged communities in mind. As such, this Roundtable functions successfully as an Environmental Justice Advisory Committee to the TCAG Board in matters relating to regional planning in the region. This is evidenced by the collaborative nature in which TCAG conducted the business of the Roundtable and incorporated suggestions of advocacy groups throughout the process. It lead to many discussions and changes to RTP/SCS policies, outreach and practices and was so successful, that it eliminated the need to consider the formation of any other group that would simply duplicate efforts. Roundtable suggestions were made part of the current draft of the RTP/SCS that is being considered for approval. It is expected that the RTP Roundtable would continue to function with future RTP/SCS cycles and continue to address issues involving environmental justice and disadvantaged communities. In future RTP Cycles, the RTP Roundtable will be able to continue to discuss an “electric vehicle implementation plan” and other topics associated with environmental justice.</p>																												
95	<p>The Environmental Justice Chapter was updated and enhanced to include population based analysis. See response to comment 93.</p>																												

Response to Joint Letter from Leadership Counsel for Justice and Accountability and Sequoia Riverlands Trust
Dated June 26, 2018

96	The RTP Roundtable is made up of members from every TCAG agency (each agency containing at least one disadvantaged community), as well as advocacy groups that have the needs of disadvantaged communities in mind. As such, this Roundtable functions successfully as an Environmental Justice Advisory Committee to the TCAG Board in matters relating to regional planning in the region. This is evidenced by the collaborative nature in which TCAG conducted the business of the Roundtable and incorporated suggestions of advocacy groups throughout the process. It lead to many discussions and changes to RTP/SCS policies, outreach and practices and was so successful, that it eliminated the need to consider the formation of any other group that would simply duplicate efforts. Roundtable suggestions were made part of the current draft of the RTP/SCS that is being considered for approval. It is expected that the RTP Roundtable would continue to function with future RTP/SCS cycles and continue to address issues involving environmental justice and disadvantaged communities. In future RTP Cycles, the RTP Roundtable will be able to continue to discuss “equity analysis” and other topics associated with environmental justice.
97	Comments on the Draft EIR are responded to in the Final EIR. The 2018 RTP/SCS projects an 87.5% increase in transit ridership from 2018 to 2042 by increasing density and providing expanded transit services under the aggressive and achievable Blueprint Scenario. The RTP Roundtable is made up of members from every TCAG agency (each agency containing at least one disadvantaged community), as well as advocacy groups that have the needs of disadvantaged communities in mind. As such, this Roundtable functions successfully as an Environmental Justice Advisory Committee to the TCAG Board in matters relating to regional planning in the region. This is evidenced by the collaborative nature in which TCAG conducted the business of the Roundtable and incorporated suggestions of advocacy groups throughout the process. It lead to many discussions and changes to RTP/SCS policies, outreach and practices and was so successful, that it eliminated the need to consider the formation of any other group that would simply duplicate efforts. Roundtable suggestions were made part of the current draft of the RTP/SCS that is being considered for approval. It is expected that the RTP Roundtable would continue to function with future RTP/SCS cycles and continue to address issues involving environmental justice and disadvantaged communities. In future RTP Cycles, the RTP Roundtable will be able to continue to discuss “transit metrics” and other topics associated with environmental justice. .
98	Comments on the Draft EIR are responded to in the Final EIR. The 2018 RTP/SCS Air Quality Conformity document explains in detail how the RTP/SCS achieves air quality conformity because it conforms to the emissions budgets set for the Tulare County Region in the SIP (Table 6.1 “Conformity Results”, Page 51). This analysis complies with federal Clean Air Act transportation conformity requirements, which are different than CEQA’s requirements for analyzing air quality impacts.
99	Funding for public outreach is provided by the Federal Government as part of the RTP/SCS process. Not only did TCAG meet all state and federal requirements for outreach, but TCAG far exceeded those requirements by conducting extensive Tribal and Disadvantaged community outreach. By partnering with CSET to conduct 71 community workshops and events, TCAG received four times the amount of feedback it has ever received in an RTP/SCS effort. TCAG also worked with the Leadership Counsel for Justice and Accountability to provide additional outreach to disadvantaged residents beyond what was required.
100	Funding for public outreach is provided by the Federal Government as part of the RTP/SCS process. Not only did TCAG meet all state and federal requirements for outreach, but TCAG exceeded those requirements by conducting extensive Tribal and Disadvantaged community outreach. By partnering with CSET to conduct 71 community workshops and events, TCAG received four times the amount of feedback it has every received in an RTP/SCS effort. TCAG also worked with the Leadership Counsel for Justice and Accountability to provide additional outreach to disadvantaged residents beyond what was required.
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Response to Joint Letter from Leadership Counsel for Justice and Accountability and Sequoia Riverlands Trust
Dated June 26, 2018

received four times the amount of feedback it has every received in an RTP/SCS effort. TCAG also worked with the Leadership Counsel for Justice and Accountability to provide additional outreach to disadvantaged residents beyond what was required. Translating all 4,000 pages into Spanish would be cost-prohibitive and is not required by federal or state laws or guidelines.

DEPARTMENT OF TRANSPORTATION**DISTRICT 6**

1352 WEST OLIVE AVENUE

P.O. BOX 12616

FRESNO, CA 93778-2616

PHONE (559) 445-5421

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*Making Conservation a
California Way of Life.*

June 26, 2018

Mr. Ted Smalley
Executive Director
Tulare County Association of Governments
210 N. Church Street, Suite B
Visalia, CA 93291

Dear Mr. Smalley:

Thank you for the opportunity to review the Tulare County Association of Governments' (TCAG) Draft 2018-2042 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). Caltrans, at District 6 and various divisions within our Department have reviewed the Draft RTP and collectively offers the following comments.

TRANSPORTATION PLANNING-DISTRICT 6

TCAG is commended for demonstrating a long-range, fiscally constrained guide with focus on federal, state, regional, and local goals for the future of their transportation system. TCAG has provided a 20-year analysis in economic growth, promotion of public health, air quality, greenhouse gas (GHG) emissions, natural resources, environmental protection, safety and quality of life to build healthier communities in the County of Tulare.

TCAG addresses the four main required elements: Policy Element, Action Element, Financial Element, and Sustainable Communities Strategy (SCS) conforming to the RTP Guidelines adopted by the California Transportation Commission (CTC) pursuant to Government Code 65080(d). This plan addresses all forms of transportation available in the County of Tulare also includes chapters on goods movement and valley wide characteristics from 2018 through 2042.

TCAG is committed to involving their public in their decision-making process. They adopted their Preferred Growth Scenario titled the Blueprint Scenario based on the development principles contained in the 2009 Tulare County Regional Blueprint. TCAG is commended for selecting this scenario which addresses various indicators including, new development, prime agriculture, critical habitat, vehicle miles travel, energy, water consumption, CO2 Emission and transit ridership. This scenario supports a reduction in use of important resources per capita as well as alternate modes of travel. Caltrans encourages TCAG to continue to apply for funding resources to further study these indicators in the County of Tulare.

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

TCAG continues to work diligently to enhance their public outreach efforts to create a more diverse transportation system for their region. In 2016, TCAG adopted their Regional Active Transportation Plan for the Tulare County Region also known as Walk 'n Bike Tulare County Plan and has become very successful due to the increased public outreach from TCAG and interest on part of the residents in active transportation. TCAG and its member agencies support the implementation of complete streets plans, active transportation projects, walking trails, and encourage employers to offer incentives for employees who walk and bike to work.

TCAG's Regional Long Range Transit Plan was adopted in 2017 and serves as a summary of future transit designs, policies, population characteristics and travel patterns within Tulare County. Additionally, TCAG's Cross Valley Corridor study intends to study future passenger rail service along existing freight corridors and facilitates growth for the future California High Speed Rail service. These two projects provide opportunities to compare transportation improvements and modal strategies, as well as research funding sources that may be available to advance the area's long-term transportation goals.

TCAG is commended for their efforts in applying for SB1 – Caltrans Sustainable Transportation Planning Grants and being successful in receiving several awards in Sustainable Transportation Planning and Sustainable Transportation Planning Formula grants.

OFFICE OF REGIONAL PLANNING-HEADQUARTERS

The Office of Regional Planning, Regional Coordination Branch has reviewed the Tulare County Association of Governments (TCAG) Draft 2018 Regional Transportation Plan (RTP) and Environmental Impact Report (EIR) and offers the following comments:

Tulare County Association of Governments is commended for:

- Developing a 2018 Regional Transportation Plan that is clear and supported with a well-documented public involvement process;
- Developing a great Executive Summary, highlighting the 2018 RTP and providing resources for public understanding;
- Completing a robust public participation plan with many nodes of access for input throughout the development of the plan.

RTP CHECKLIST COMMENTS

The RTP Checklist should be signed, and should reference RTP content locations in the body of the RTP and give the appropriate page number locations, not just Chapter or Appendix references.

General

#4(h). The Checklist should indicate additional page numbers that fully identify a forecasted development pattern for the region which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks.

Financial

#7. Please identify where the RTP contains a statement regarding consistency between the projects in the RTP and the ITIP (2016 STIP Guidelines Section 33).

#8. Please identify where the RTP contains a statement regarding consistency between the projects in the RTP and the RTIP (2016 STIP Guidelines Section 19).

#9. There is not a page A-47. Please identify in the Final Adopted document where the RTP addresses the specific financial strategies required to ensure the identified TCMs from the SIP can be implemented.

Environmental

Due to the importance of the environmental component of the RTP, it would be more appropriate to specify the applicable pages. Although the Checklist questions can be found in the indicated Appendices and PEIR, garnering page ranges will be more beneficial to the viewing public.

OFFICE OF STATE PLANNING (OSP)-HEADQUARTERS

Thank you for the opportunity to review and provide comments on the 2018 TCAG Draft RTP/SCS. OSP would like to offer the following comments for your consideration:

Executive Summary:

- There does not seem to be a cover, or at least not one that Caltrans can find on the website. One should be created if not done so already.

Policy Element:

- There is no mention of general information on the California Transportation Plan (CTP) or aligning with the most recently adopted plan, the CTP 2040. There should be mention of the effort to align with statewide goals, policies, strategies, and recommendations where they apply to the needs of Tulare County. Here is an example of some language that could be possibly inserted under the State and Federal Issues section:

- "Senate Bill 391 (SB 391, 2009) required the California Department of Transportation to prepare the California Transportation Plan (CTP), a statewide long-range transportation plan, by December 2015, to reduce GHG emissions. This system laid out in the CTP 2040 showed reductions in GHG emissions to 1990 levels from current levels by 2020, and 80 percent below the 1990 levels by 2050 as described by AB 32 and Executive Order S-03-05. The CTP 2040 demonstrates how major metropolitan areas, rural areas, and state agencies can coordinate planning efforts to achieve critical statewide goals. TCAG will work to align with the goals, policies, strategies, and recommendations laid out in the CTP 2040 where applicable."

- Caltrans is beginning the development the next iteration of the State Transportation Plan, the CTP 2050, will be developing new scenarios, policies, strategies, and recommendations. Caltrans recommends mentioning within the RTP that coordination and collaboration with Caltrans during the development of the CTP 2050 would also be beneficial.

7

Sustainable Communities Strategy:

- SB 375 and SB 743 are mentioned extensively and the forecasting numbers are easy to read through the use of charts and graphs, but could be more aesthetically improved.
- There is no mention of AB 32's goal of lowering statewide GHG emissions 80% below 1990 levels by 2050 as well as SB 32's mid-point goal of lowering statewide GHG emissions 40% below 1990 levels by 2030. Even though the county only has set GHG targets by ARB from SB 375 for the years 2020 and 2035, it would be beneficial to mention how the county's goals fit into California's overall goal of reducing GHGs.

8

9

General Comments:

- Some of the text and shapes in the maps are hard to read due to font size and pixilation. It would be beneficial to export these from GIS in higher resolutions or file formats to alleviate this issue. This is the case with all of the maps throughout the document.
- There are a few images and photos in the document. Caltrans recommends adding pictures throughout the plan to make the document more readable and aesthetically pleasing.

10

11

Thank you for considering our comments for inclusion of the Final TCAG 2018 Regional Transportation Plan. Caltrans looks forward to partnering with TCAG on future transportation issues to ensure that planned projects in the RTP are equitable and sustainable. If you have any further questions, please contact me at (559) 445-5421.

Sincerely,



LORENA MENDIBLES
Associate Transportation Planner
Transportation Planning-North

c: Gail Miller, Michael Navarro, Shane Gunn, Albert Lee, Caltrans District 6
Erin Thompson, Caleb Brock, Patrick Record,

Lorena Mendibles, California Department of Transportation, June 26, 2018

Number	Response
1	Comment Noted
2	The checklist will be signed with the submittal of the Final RTP and include suggested changes.
3	Will include in final version of the RTP.
4	Will include in the final version of the RTP
5	The cover of the Executive Summary serves as the cover of the RTP.
6	Will include similar language in the final version of the RTP
7	Will include in the final version of the RTP
8	Comment Noted
9	Will include similar language in the final version of the RTP
10	Comment Noted
11	Pictures are concentrated into the Executive Summary for efficiency and cost savings

Response to Consultant Team Questions – Cross Valley Corridor Stakeholders – Dave Jones /comments

Question Number

- 1) *One day is as good as any estimate. East to West or West to East travel is probably work and sales related.*
- 2) *I would think that our Visalia to Westside movement Will require more parking in Visalia. Hanford and Visalia may be the Premiums place to live.*
- 3) *Build the bike paths for powered bikes too – we have no idea where It is going.*
- 4) *Probably a good number if you provide for electric cars or busses.*
- 5) *Yes.*
- 6) *A Peddler coming from LA or the Bay area needs a car. Allow for that.*
- 7) *To go to my Persian “Fuggot Khoda Me Do Nay” Translation: “Only God Knows”. Looks like another meeting on that alone!*
- 8) *Peak: 5AM to 8AM and 4PM to 7PM. 10 Off Peak: 8PM to 5PM*
- 9) *Why not! Only Charlie High Speed Rail Knows!*

Dave Jones – Hanford, CA

1/18/17

Dave Jones, January 18, 2017

Number	Response
1	Comments Noted



June 15, 2018

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Mr. Ted Smalley
Executive Director
Tulare County Association of Governments
210 N Church Street, Suite B
Visalia, CA 93291

Subject: 2018 Draft Regional Transportation Plan/Sustainable Communities Strategy for Tulare County

Dear Mr. Smalley:

Thank you for the opportunity to comment on the 2018 Draft Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS). The California High-Speed Rail Program is supportive of new and innovative planning that represents unique, local appropriate approaches to high-speed rail station area development. This type of planning is reflected in the Tulare County Association of Governments' Draft RTP/SCS.

First of all, I would like to compliment TCAG for including the following policies:

- 1) Encourage jurisdictions to consider public transit, transit-oriented development and mixed-use development, rail and other complete street development during updates of general plans and other planning processes;
- 2) Encourage development of a transit system that interconnects and coordinates with other modes of transportation;
- 3) Encourage the cities of Visalia, Porterville, Lindsay, Exeter, Farmersville, Dinuba, Woodlake and Tulare to plan and implement transit-oriented land use along the planned Cross Valley Corridor;
- 4) Support the development, extension, and maintenance of passenger rail services, including, but not limited to, Cross Valley Rail, High-Speed rail and Amtrak.
- 5) Including the Cross Valley Corridor Plan in the Action Element.

The Draft RTP/SCS references complete streets policies and working with other agencies to carry out the Cross Valley Corridor Plan. We request your consideration of the following comments into the Draft RTP/SCS:

- 1) Complete Street Policies for the cities of Visalia, Farmersville, Exeter and Lindsay in the appendix, if available;
- 2) Coordinate with transportation agencies across borders to ensure an efficient flow of people along key interregional corridors to carry out the Cross Valley Corridor Plan in Tulare, Kings and east Fresno counties.

Mr. Ted Smalley
Page 2

In closing, the California High-Speed Rail Program would like to thank you and your staff for your leadership, flexibility and teamwork regarding the recent completion of the Cross Valley Corridor Plan. We look forward to working with you in the future.

Sincerely,



Diana Gomez
Central Valley Regional Director
(559) 445-5172
diana.gomez@hsr.ca.gov

cc: Ben Kimball, Deputy Executive Director, Tulare County Association of Governments
Meg Prince, Associate Regional Planner, Fresno Council of Governments
Caitlin Miller, Air Pollution Specialist, Air Resources Board
Vito Chiesa, San Joaquin Joint Powers Authority Chair, San Joaquin Joint Powers Authority
Ken Zatarain, Access Planner, California High-Speed Rail Authority
Ben Lichty, Supervising Transportation Planner, California High-Speed Rail Authority
Karl Fielding, Planning Manager, California High-Speed Rail Authority
Stuart Mori, Senior Transportation Planner, California High-Speed Rail Authority

Diana Gomez, California High Speed Rail Authority, June 15, 2018

Number	Response
1	Comments Noted
2	Will add to the Final RTP if they exist
3	Comment Noted

Julie Allen

>>> "Julie Allen" <julallen@springvillewireless.com> 06/12/2018 10:31 >>>

Good morning, Ted

At our Roundtable meeting you emphasized the importance of reviewing the "Policy Element". I have done so and have the following comments to offer:

1). In general, I like this draft. The policies cover the subject area without being unduly restrictive. It provides a nice frame for what follows.

2). I have just a couple of specific items to offer for your consideration.

On page A-5 I cannot tell if Service Levels C and D are for peak hours or averages.

On page A-6 I am concerned about "...to the extent feasible" with respect to incorporation of climate change adaptation. What does this actually mean? Since this whole exercise is about reduction of GHG's, I think we can deal more forthrightly with climate change.

Page A-12 contains the only reference I can find to ADA and dealing with people with various disabilities. This seems a little thin. What about a policy recognizing the challenges of people with disabilities in the multi-modal world we are creating?

I would ordinarily invite you to call or email if you have any questions about my comments, but I will be in the UK starting Thursday. Well, someone has to do it....

All the best,

Julie

Julie Allen
Tulare County LAFCO

Sent from my iPad

Julie Allen, June 12, 2018

Number	Response
1	Comment Noted
2	For Peak Hours
3	Will clarify in the final version of the RTP
4	Will include in the final version of the RTP



October 20, 2017

Benjamin Kimball
Deputy Executive Director
Tulare County Association of Governments
210 N. Church St., Suite B
Visalia, CA 93291

RE: Conservation and Mitigation Provisions in RTP/SCS Policy Element

Dear Mr. Kimball:

I am writing on behalf of Sequoia Riverlands Trust (SRT) to comment on the Draft Policy Element discussed at the September 13, 2017 RTP Roundtable meeting. SRT is a regional, accredited land trust that inspires love and lasting protection for important lands, including habitat and farmland in Tulare County. We are grateful for the Tulare County Association of Governments' (TCAG's) work on the Draft Policy Element, and appreciate the opportunity to offer input on Tulare County's second RTP/SCS.

Tulare County is home to some of the most productive agricultural land on the planet, with annual crop receipts amounting to over \$6.3 billion.¹ It hosts habitat corridors crucial to maintaining biodiversity in a changing climate,² groundwater recharge areas that can play a key role in meeting our region's water needs,³ and parks that draw visitors from around the world. Thanks to a long legacy of conservation, including not only the designation of Sequoia and Kings Canyon National Parks, but also the innovative Rural Valley Lands Plan (RLVP) adopted in 1975, it has led the region in conserving these resources for future generations. Tulare

¹ Tulare County Agricultural Commissioner/Sealer. 2017. Tulare County Crop and Livestock Report, 2016. Retrieved from <http://agcomm.co.tulare.ca.us/default/index.cfm/standards-and-quarantine/crop-reports/crop-reports-2011-2020/2016-crop-report/>.

² Southern Sierra Partnership. 2010. Framework for Cooperative Conservation and Climate Adaptation for the Southern Sierra Nevada and Tehachapi Mountains. Retrieved from <http://www.southernsierrapartnership.org/ssp-framework.html>.

³ Thorne, J.H., Roth, N.E., Boynton, R.M., and Woodard, N. 2014. The San Joaquin Valley Greenprint State of the Valley Report. Retrieved from <http://www.fresnocog.org/san-joaquin-valley-greenprint-program>.

County's first RTP/SCS continued in these footsteps by adopting a policy of encouraging "projects that support the preservation of farmland and open space," committing to assist agencies with mitigation using Measure R funds, and using San Joaquin Valley resource layers as constraints to development in its preferred land use scenario.⁴

We are grateful to see that the Draft Policy Element for Tulare County's second RTP/SCS includes an objective of "minimiz[ing] the environmental impacts of transportation projects and encourag[ing] the coexistence of nature and human circulation needs."⁵ In keeping with this objective, we would recommend the following additions to the Policy Element:

- **Project Prioritization:** TCAG's 2014 Policy Element committed to "[p]rioritize projects that support the preservation of farmland and open space,"⁶ but this language does not appear in the current Policy Element. Incorporating conservation into project selection criteria would help to minimize environmental impacts, and would complement TCAG's use of Greenprint layers in its land use scenario. It could also be easy to implement. The Kings County Association of Governments (KCAG), for example, has begun to integrate natural resource concerns into its scoring system for selecting highway projects, with points awarded for avoiding harmful impacts to special status species and viewsheds.⁷ We would encourage TCAG take a similar approach, incorporating impacts to agricultural land, habitat and groundwater recharge areas into its ranking criteria for transportation projects. In the Policy Element, this would entail 1) restoring the commitment to "prioritize projects that support the preservation of farmland and open space," and 2) adding conservation criteria to the list of ranking factors for projects (Policy 1 on the bottom of page 2-5).
- **Development Patterns:** We are pleased to see that improved air quality and greenhouse gas reductions are identified as goals for new projects (Policy 1 under "Develop a sustainable regional road and circulation system").⁸ To further strengthen this policy, we would propose adding that projects should support patterns of development that conserve agricultural land, habitat and groundwater recharge areas.
- **Mitigation:** We appreciate TCAG's continuing commitment to provide Measure R resources for mitigation⁹ and, as discussed on the 27th and afterwards, SRT stands ready to help. In keeping with the Programmatic Environmental Impact Report (PEIR) for TCAG's previous RTP/SCS, we would recommend that this policy be framed in the

⁴ TCAG. 2014a. 2014-2040 Regional Transportation Plan & Sustainable Communities Strategy for Tulare County. Retrieved from <http://www.tularecog.org/RTP2014/>.

⁵ Draft Policy Element, 2-6.

⁶ TCAG, 2014a.

⁷ KCAG. 2014. Kings County 2014 Regional Transportation Plan. Retrieved from <http://www.kingscog.org/planning.html>.

⁸ Draft Policy Element, 2-6.

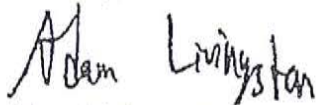
⁹ Draft Policy Element, 2-6.

context of an explicit commitment to mitigate the impact of transportation projects on agricultural land and other natural resources.¹⁰ We would also recommend that TCAG follow its 2014 PEIR in identifying the appropriate holder of mitigation easements as an organization “whose purpose includes the acquisition and stewardship of agricultural conservation easements,” such as an accredited land trust.¹¹

- **Active Transportation and Outdoor Recreation:** We support TCAG’s commitment to close gaps in the bicycle and pedestrian system (Policy 10 on page 2-12).¹² To further encourage biking and walking, we would propose that active transportation investments include bike lanes and trails that connect urban areas with parks, preserves and other scenic landscapes, particularly in the corridor between Visalia and Sequoia National Park.¹³ As the owner and manager of six preserves in Tulare County, SRT would welcome the chance to collaborate on projects that link hikers and bike riders with outdoor recreation opportunities.

We appreciate the opportunity to comment, and look forward to discussing these proposed changes further.

Sincerely,



Adam Livingston
Director of Planning and Policy
Sequoia Riverlands Trust

¹⁰ TCAG and Rincon Consultants, Inc. 2014. Final Program Environmental Impact Report: 2014 Regional Transportation Plan and Sustainable Communities Strategy. Retrieved from <http://www.tularecog.org/RTP2014/>.

¹¹ TCAG and Rincon Consultants, 2014; TCAG, 2014b (resolution adopting RTP/SCS and PEIR, and specifying that the appropriate holder of mitigation easements is “a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements”).

¹² Draft Policy Element, 2-12.

¹³ In addition to incorporating access outdoor recreation into the policies on page 2-12, we would recommend adding it to the public health goal on page 2-15.

Adam Livingston, Sequoia Riverlands Trust, October 20, 2017

Number	Response
1	a. Will include similar language in the final version of the RTP. b. Will develop a project ranking system considering these factors that includes projects not already prioritized by Caltrans (on the State Highway) or by Measure R.
2	Existing Policy 1 on page A-6 of the Draft RTP/SCS already calls for TCAG to encourage and support transportation projects that, among other things, conserve agricultural land and natural resources. Details of agricultural land mitigation and conservation easements are best handled at the project level by local agencies.
3	The Draft PEIR contains provisions for mitigation by conservation easements to be administered in accordance with applicable laws.
4	Details of agricultural conservation easements are best handled at the project level by local agencies.
5	Under the Objective that follows, Policy 5 encourages development of collaborative partnerships with other agencies, such as SRT, to develop land/corridors for multi-use (including recreational) trails. It should be noted, in terms of prioritization, that Safe Routes to Schools projects tend to do better in ATP competitive scoring than recreational projects.



Benjamin Kimball
Deputy Executive Director
Tulare County Association of Governments
210 N. Church St., Suite B
Visalia, CA 93291

RE: Comments and Policy Recommendations on 2018 RTP Policy Elements

Thank you for the opportunity to be part of Tulare County's RTP policy roundtable and to comment on the draft 2018 RTP Policy Element. On behalf of Leadership Counsel for Justice and Accountability and as the Environmental Justice representative of this roundtable, it is my aim to ensure the 2018 RTP Policy Element is as robust and explicit when identifying goals, issues, and potential policy solutions to both mitigate adverse impacts and satisfy the existing transportation needs of Tulare County's residents. My comments are informed by my direct work with low-income communities and communities of color in Tulare County and it is my intention that with these proposed policies will result in equitable investment and development for rural and low-income residents in Tulare County and that these communities will receive funds, development, and services that have historically been denied.

1. Further Highlight the Importance of Equitable Transportation Investment

TCAG should use the RTP as a mechanism for increasing health and meeting existing needs for all the residents within its jurisdiction. To do so, TCAG must clearly lay out for its goal to address and close service and access gaps for current residents and communities and ensure new growth and development of the region does not intentionally or adversely affect the disadvantaged, low-income, or rural communities in Tulare County.

The concept and policy of transportation equity should be included as a goal for TCAG and support for its inclusion is found directly in the text of SB 375, which states that the policy element may include, "Measures of equity and accessibility including, but not limited to, percentage of the population served by frequent and reliable public transit, with a breakdown by income bracket, and percentage of all jobs accessible by frequent and reliable public transit service, with a breakdown by income bracket."¹ To facilitate development and implementation of transportation equity a definition is provided as follows:

Ensure equitable access to effective and viable transportation options for all, regardless of race, gender, income, national origin, age, location physical ability, or any other

¹ (Government Code 65080 (b)(1) (E) we acknowledge at this provision is included with respect to jurisdictions with more than 200,000 residents, it nevertheless evidences an intent by the legislature that jurisdictions consider equity in RTP/SCS development. This failure to include quantification of equity for smaller jurisdictions is likely an acknowledgment that tools to model equity may be a financial burden for those jurisdictions. The population restriction in Section 65080 does not, however, weigh against including transportation equity as a goal of the RTP/SCS.



Strategy.”³ While mandatory as a corrective measure, continued analysis and quantification of communities’ existing barriers to clean and effective transportation is proactive and will facilitate TCAG and other jurisdictions’ acquisition of grant funding for meaningfully addressing the identified barriers and can set a solid foundation for continued emissions reductions for the 2035 horizon and beyond. For an example of barrier studies applied within Tulare County see Appendix A for a case study of Tipton and Woodville.

3. Encourage Local Jurisdictions to Provide Incentives to Promote Public Transit, Walking, and Bicycling, Ride Sharing as Viable and Convenient Alternatives to Driving

We note the ambitious goals that the California Department of transportation (Caltrans) has set for shifting how Californians travel. Recognizing that alternatives to drive urgently need for the well-being of those who cannot drive such as youth and the elderly; for those who cannot afford vehicles, and to achieve state and federal air quality and climate goals – Caltrans’ Strategic Management Plan (2015-2020) calls for reducing per capita VMT by 15% statewide by 2020 compared to 2010, for tripling biking and for doubling walking and transit mode shares by 2020 compared to the 2010-2012 California Household Survey. Caltrans recommends that to reach state goals, transportation agencies need to encourage mode shift and take steps to transform transit and active transportation into viable alternatives to single occupancy vehicles use.

4. Include a Policy that Focuses on “First Mile / Last Mile” Solutions

We encourage a policy that explicitly addresses “first mile / last mile” solutions to existing and transportation gaps. For example, one might travel via TCAT but need later to walk to their meeting or appointment. Or en route to a bus stop, there is little shade, thus dissuading residents from utilizing public transit during heatwaves or rain. Solutions for the last mile” might also include bikeshare, carshare, walking paths, enhanced taxi service employer-run shuttle, or other alternatives depending on context. This policy might read:

Conduct a study and solicit public input to identify first-mile / last-mile linkages near transit stops throughout the county. Work with local jurisdictions to identify solutions and prioritize these for funding, with a priority on high-volume transit and on transit that serves disadvantaged communities or communities of color.

5. Adopt a Ten-Year Target and Identify Near-Term Investment to Contribute to Caltrans’ Statewide Goal of Tripling Biking and Doubling Walking by 2020

As noted, Caltrans has set a statewide goal of tripling biking and doubling walking by 2020 as compared to 2010-2012. We encourage TCAG to adopt the same ten-year target and then identify near term investment that would achieve this. Given the relatively low rates of walking and biking, and plans for infill development in many communities, this target is likely well within reach.

6. Add a Goal That Prioritizes Road and Bridge Maintenance.

³ Government Code 65080 (2) (F) (i)



Objective: Minimize Environmental impacts of Transportation projects and encourage the coexistence of nature and human circulation needs.

1. Complete and adopt a Programmatic Environmental Impact Report for the Regional Transportation Plan. 7
2. Review environmental documents on regional projects and pertinent development proposals. 8
3. Evaluate and assist agencies with mitigation possibilities, when feasible, working with Measure R environmental funds and other funding opportunities, to assist with the mitigation of road projects found in the RTP. 9
4. *Incorporate Climate adaptation and resilience into all projects to ensure longevity of projects and prevent any unnecessary damage or adverse impacts resulting from climate change.* 10
5. *Minimize the loss of natural lands, working lands, and groundwater recharge areas, related to construction of transportation projects.* 11

8. Recognize that Roadway Expansion Induces More Driving Demand and Prioritize More Effective Strategies that Not Only Reduce Congestion But Better Meet State and Federal Air Quality and Climate Goals.

TCAG's last policy element begins with, "In some cases, traffic has exceeded roadway capacity and mitigation measures are needed to relieve congested areas." This implies that roadway development for example, expansion of Highway 99 or Highway 65 can alleviate congestion. However, research has found that expanding roadway capacity expansion is counterproductive. It fails to alleviate congestion and leads to both short- and long-term increases in vehicle miles traveled including associated air pollution and other adverse health impacts to residents. A Department of Transportation study reports that "a capacity expansion of 10% is likely to increase VMT by 3% to 6% in the short-run and 6% to 10% in the long-run."⁷ As a result, TCAG should be transparent in its decision-making process to balance near-term safety on the road and long-term damage caused by emissions from cars and light trucks within its jurisdiction. 12

9. Outreach and Education

It is essential that TCAG seek meaningful public input to build trust with communities as well as for venues to foster dialogue about Tulare County's many needs and priorities. We would like to inquire if TCAG has a plan developed for incorporating public comment aside from the RTP roundtable on the 2018 Policy Element and meaningful development of Scenarios. An absolutely integral aspect of this is ensuring all potentially affected residents have timely access to key documents or developments within the 2018 RTP update. Section 14522.2 (a) of the government Code reads: "A Metropolitan planning organization shall disseminate the methodology, results, and key assumptions of whichever travel demand models it uses in a way that would be useful and understandable to the public." 13
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⁷ Handy, Susan. (2015). Increasing Highway Capacity Unlikely to relieve Traffic Congestion. http://www.dot.ca.gov/newtech/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf



- *Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.*⁸

TCAG plans to accomplish this goal through ~~two main~~ several efforts: by conducting *meaningful* public outreach and receiving resident input *from rural and disadvantaged communities, conducting barrier studies and needs assessments*, review of project-related studies and programs to ensure that Environmental Justice issues *like transportation equity, segregation, adverse impact, and historical divestment*, are addressed in the planning, programming and implementation process.

As usual, TCAG staff may follow-up or direct any questions to my email at phernandez@leadershipcounsel.org or phone at (559) 369 -2790. I look forward to continued dialogue and collaboration to foster a sustainable transportation network that serves the needs of Tulare County residents.

Thank you for your consideration,

Pedro Hernández

Pedro Hernández
Leadership Counsel for Justice and Accountability

⁸ Federal Transit Administration Circular 4703.1, "Environmental Justice Policy Guidance for Federal Transit Administration Recipients" (August 15, 2012), pg. 2.

Pedro Hernández, Leadership Counsel for Justice and Accountability (letter undated)

Number	Response
1	Regional projects serve all populations in the region. Projects in cities benefit disadvantaged residents in cities. Projects in the rural county benefit disadvantaged residents in the county. TCAG invests in them all. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities.
2	See corrected text
3	This is already done using Measure R, TPASS, COS Pass and other incentives
4	This is currently being done with the Regional Transit Coordination Study
5	The Measure R contribution to biking and pedestrian projects, the Active Transportation efforts currently demonstrate TCAG's commitment to this type of transportation.
6	Will include in the final version of the RTP
7	Already done
8	Already ongoing at TCAG
9	This is addressed in the Program Environmental Impact Report.
10	Policy 5 on Page A-6 of the Policy Element addresses this comment.
11	Will develop a project ranking system that considers these factors that includes projects not already prioritized by Caltrans (on the State Highway) or by Measure R
12	Some but not all roadway expansion induces more driving demand. Of course it would depend on the definition of roadway expansion and the definition of driving demand. For example, Hermosa Street in Lindsay was widened to four lanes in the 1970's (or 1980's) but does not have significant traffic on it today, nor has the City of Lindsay experience much growth since then. State Route 65 near Lindsay was widened to four lanes at about the same time but continues to have only sporadic traffic and operates at a LOS A for most of the day, if not all of the day. Conversely, Spruce Avenue has not been widened at all since it was constructed, and has had very significant increases in vehicular traffic in recent years. Other factors besides widening play into whether or not there is an increase of traffic on any given road.. TCAG supports the continued evaluation of alternatives through corridor studies that prioritize operation projects over widening.
13	The outreach conducted with this RTP quadrupled the reach and results over previous years.
14	TCAG's RTP/SCS process meets this requirement.
15	Regional projects serve all populations in the region. Projects in cities benefit disadvantaged residents in cities. Projects in the rural county benefit disadvantaged residents in the county. TCAG invests in them all. The RTP/SCS's Environmental Justice Report appendix further demonstrates that disadvantaged communities equally share the benefits of and burdens of the RTP/SCS with non-disadvantaged communities

Draft 2018 RTP/SCS Public Hearing Transcription

Chair Michael Ennis:

Regional Transportation Plan/Sustainable Communities Strategy

Air quality Conformity Document

Federal transportation improvement program and Environmental Impact Report

This is the time and place scheduled for a Public Hearing to comment on the Draft 2018 Tulare County Regional Transportation Plan, Sustainable Communities Strategy, Air Quality Conformity Document, Federal Transportation Improvement Program and Environmental Impact Report. These documents have been available for public review on the TCAG website at tularecog.org. The public comment period is currently open for all documents and closes on June 26, 2018 at 5:00 p.m.

If you wish to submit testimony, please identify yourself and any agency or group you are representing. The public hearing is now open.

Okay, I think have.... (inaudible)

Pedro Hernandez you've got the floor.

Pedro Hernandez:

Alright, is this mic on?

Yeah, so Good Afternoon my name is Pedro Hernandez. I'm sure you are all familiar with me by now. I work for a nonprofit that works with rural communities here in Tulare County; Leadership Counsel for justice and accountability and I've also been a member of the RTP Roundtable so I've been involved to some degree with the development and just kind of conversation around the 2018 RTP/SCS update. And so I wanted to begin my comments with, you know, kudos to, you know, TCAG staff who have been very responsive, and you know, in my opinion, have, you know, drafted one of the better, you know, regional transportation plan updates in the San Joaquin Valley. My organization works also in other counties as well in this great process. So I do want to give kudos. And you know, and also give kudos to TCAG for, you know, providing a plan that does meet and exceed the current greenhouse production targets that the state mandated as well.

With that being said, I do have some further comments and just general concerns over the implementation of the Regional Transportation Plan. Just generally there has been early signs of electrification in, you know, Porterville and Visalia with electrification of the transit system. Something that I think would be interesting and would further the goals of, you know, TCAG, as well as help facilitate the state greenhouse gas reductions vendors is to provide some sort of

metrics as far as what equitable development investments are concerning electrification in rural communities. I just think this is something that, you know, just from a policy's perspective, you know, rural electrification is its own different process than electrifying, you know, a more urban bus line. And so I just think that should be something to be considered and be something to be further talked about. Furthermore, another concern of mine, is that the 2018 RTP/SCS update does provide very minimal increases in overall transit and bike /pedestrian travel; it's about 1% or so. And I just think that the RTP/SCS update is an opportunity, again, to provide, you know, feasible alternatives to, you know, single occupancy driving. And I think, you know, increasing, you know, to the fullest and being very aggressive as far as increasing active transportation and, you know, overall public transit ridership could be another venue that TCAG uses to meet its greenhouse gas reduction targets and also mitigate the anticipated congestion on major highways from vehicles.

Another suggestion, in my opinion, that I think would really provide more robust public comment process in addition to, you know, to the, I think it's 71 events that TCAG provided outreach in, about so, right? Yeah, I, I, I think something that would be very interesting as far as like providing meaningful engagement would be a follow up meeting in every single one of the communities where this initial scenario selection was sought out, you know cause I think, you know once the surveys, are, that initial round of surveys are done; you know, it's, it's, it's obvious just from this meeting as well that you know the same volume of participation is not followed through throughout the entire process. So, I just think modifying the public participation plan, unless it's in there already, to, you know, actively provide follow up meetings where comment was initially sought out would be, you know, very, just constructive process as well.

Let's see.

Yes, another concern, as far as the Environmental Justice chapter in the RTP is that equity is defined, or that the investments are defined as equitable because rural communities, environmental justice communities, cover 1 or 2% of the total land of Tulare County of the populated land. And I think that rather raising it on overall land covered a more appropriate determination of what equity means as far as lands of investment would be based on population which inversely would mean that rural communities, or when concerning population rural communities are about 1/3 of the overall population served by, under the jurisdiction of TCAG. So I think that is also something to, you know, consider as far as defining what equity means for this investment plan.

And then finally the overall vision of this Blueprint Scenario, which is the preferred scenario; is that it imagines increased transit but also a pretty static reliance on major highway corridors. And part of this is due to congestion, part of it is also just like maintenance of very high volume

traffic corridors but in the Environmental Impact Report there are several significant impacts regarding run water quality, regarding storm water flooding, regarding as well ability for groundwater recharge that they're identifying as significant even after mitigation. And so I just think for a high priority basin like the Kaweah which serves most of Tulare County, these are factors that should be considered as well in so far in long range planning for Tulare County aside from transportation because a fear that I have is that, you know, as planning would address one issue which is greenhouse gas issues but create another which is increased ground water insecurity which no one here needs to be reminded of that, you know, Tulare County has kind of ground zero for vulnerable runwater in California.

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And so, thanks.

I also want to close with another shot out. I don't want to end on a negative note we do appreciate an extra hearing being set up on June 20th, or on June 25th, I believe, right? (Admin Clerk clarified: "workshop") Yeah, a workshop, as well too. I just want to, I was just notified right when I got here that is like I said, you know, as far as meaningful engagement. And a time that is accessible to most people who are working right now. So thank you.

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Michel Ennis: Thank you. Anyone else wishing to come forth in the Public Hearing? Seeing none, we will close the Public Hearing.

Pedro Hernández, Leadership Counsel for Justice and Accountability, Transcript of Comments at TCAG Governing Board Meeting, June 18, 2018

Number	Response
1	Comment noted.
2	Porterville Transit is the first agency in the region to begin deployment of fully electric buses. TCAG Long Range Transit Plan cites this agency as a pilot effort for encouraging electric bus deployment throughout the region (p. 4-61).
3	The forecasted increase in transit ridership is the result of multiple factors affecting mode share modeling. However, in terms of TCAG's investment in transit and active transportation, the 2018 RTP/SCS can be seen as quite aggressive with the percentage of total investment going to transit at 21.7 compared to 12.8 for the 2014 RTP/SCS. For active transportation the percentage is 4.7 compared to 0.4 for the 2014 RTP/SCS. (Appendix 46, Environmental Justice Report, p. 13).
4	TCAG's Public Participation Plan is evaluated periodically to see if its procedures and strategies are still effective. This suggestion will be considered as part of that evaluation.
5	The Environmental Justice Study does not directly define equity. Some of the performance measures included in the study to analyze social equity factors have been revised based on comments received and TCAG's own review.
6	The preferred scenario in the 2018 RTP/SCS, the Blueprint Scenario, is an integrated land use strategy that aims to serve forecasted growth and development while making the most efficient use of natural resources, including groundwater, and conserving air and water quality.
7	Comment noted. The workshop was on June 25 th .

TCAG-Policy Element
Questions and Comments

Mike Lane

September 28, 2017

1. How efficient is the use of fixed route bus programs in reducing GHG emissions when the bus is mostly empty and the amount of person-miles travelled is very small compared to the overall miles traveled? Seems like the GHG emissions per person is very high. | 1
2. State and Federal funding issues- Is California SB-1 funding being factored into the equation? | 2
3. How does the Regional Travel Model factor in the lack of ridership on public transportation in regard to GHG? Are gross bus miles traveled used for the calculation? | 3
4. What is the definition "benefits and burdens" of the Environmental Justice program? Would Spruce have to be routed around Tooleville? | 4
5. What improvements to the road system are anticipated that will promote Congestion Mitigation? | 5
6. Will System Performance be evaluated by LOS or VMT? | 6
7. Regional Roads and Corridors: Why would TCAG "support the extension of State Route 65 north to Fresno County" when other Tulare County arterials are not improved because of lack of funding? Does not the extension of Highway 65 run counter to Governor Brown's "road diet"? | 7

Mike Lane, September 28, 2017

Number	Response
1	The current RTP/SCS update has a horizon year of 2042. In that long-term perspective, the level of transit ridership is influenced by a number of interconnected factors including land use and demographic trends and changes in the cost of fuels. Looking at the growth scenarios studied during the RTP/SCS development process, those scenarios that emphasize more compact development and greater transit investment reduce per capita GHG emissions more than the other scenarios.
2	SB-1 funding considerations have been factored into development of the RTP/SCS update to the extent that reliable information is available.
3	See Response (1) above.
4	<p>The California Transportation Commission's RTP Guidelines (2017, p. 77) reference U.S. Dept. of Transportation Order 5610.(a) which uses the term "benefits and burdens" in the following context:</p> <p><i>"...identifying and addressing disproportionately high and adverse effects of the agency's programs, policies, and activities on minority and low-income populations to achieve an equitable distribution of benefits and burdens. This includes the full and fair participation by all potentially affected communities in the transportation decision-making process".</i></p> <p>TCAG has endeavored to apply this context in its Environment Justice analysis and as a basis for RTP development.</p> <p>TCAG is not currently involved with, or aware of, any active proposal to reroute Spruce Road around Tooleville.</p>
5	TCAG and its member agencies participate extensively in the Congestion Mitigation and Air Quality (CMAQ) program. This is one of a number of ways used to finance projects that help address congestion now and in the future. This is discussed in detail in the Draft Action Element of the RTP update. Note especially the projects listed for congestion relief in Table A-13.
6	System performance is evaluated by both LOS and VMT in various locations of the draft RTP/SCS.
7	There is not project currently in the State Transportation Improvement Program (STIP) to extend Highway 65 north to Fresno County. Any such proposal would be subject to extensive State and regional-level review in terms of prioritization.