



City of Long Beach
Department of Health
and Human Services

Los Angeles County
Department of Public Health

City of Pasadena
Public Health Department

County of Riverside
Department of Public Health

Santa Barbara County
Public Health Department

County of San Bernardino
Department of Public Health

County of San Diego
Health and Human Services
Agency

Ventura County
Public Health

Cheryl Viegas-Walker, President
Regional Council
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

February 1, 2016

Dear President Viegas-Walker:

The Public Health Alliance of Southern California (Alliance) is a collaboration of local health departments in Southern California. Our health departments are committed to realizing a vision in which all Southern California communities are healthy places to live, work, play and learn. We were pleased to participate in the development of the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) as part of our efforts to achieve this goal. Thank you for your efforts to include health in the development of the RTP/SCS, and for the opportunity to provide the following comments on the draft plan.

Overarching Comments

The 2016-2040 DRAFT RTP/SCS and the plan scenario point our region in the right direction, and represent important progress for considering the public's health when planning for our region's future.

We are pleased that the plan does the following:

- Puts the region on target to meet our AB 32 Greenhouse Gas Reduction goals of 8% by 2020. *Climate change is a threat to public health in our region, our Alliance strongly supports the climate change mitigation actions included in this plan.*
- Includes increased investment in transit and more active modes of transportation, particularly in Los Angeles County. *Transportation and built environment structures that support increased physical activity will significantly improve our region's health.*
- Includes performance measures that will help us understand the health impacts of the plan, and measure our progress toward implementation.
- Includes a more robust Environmental Justice analysis than prior plans, setting the stage for increased commitment to equity in our region.
- Includes a framework for operationalizing the ongoing consideration of health in our regional planning, as detailed by the Public Health Work Program in the Public Health Appendix.
- Is supported by data efforts, including the REVISION tool and the Urban Footprint Scenario Planning Module, which will allow us to project and understand trends in our region and plan impacts at a more granular level.
- Includes targeted land use strategies to help meet plan goals, including intensification of land use in high quality transit areas, complete streets strategies, and the livable corridor strategies.

We encourage SCAG members to work to implement these strategies within their local plans.

Recommendations for the Project List and Performance-Based Planning

- Consider a performance-based cost/benefit analysis of the largest projects as a way of building authentic public engagement around funding decisions included in plan.
- Consider setting aside a portion of funding for a public discussion/ referendum on the types of projects to be included in the plan as a way of building public engagement. At this time there is no clear mechanism for public input on the project list.
- Performance measures in general, and the public health and environmental justice measures in particular should include numeric targets rather than a simple directional goal/presentation of data.
- Include a performance monitoring measure in the RTP/SCS tracking the number of very low, low, and moderate income housing units available and constructed as a way of gauging progress towards the 2013 Regional Housing Needs Assessment by 2021.
- Maintain an updated public data portal that allows the public to measure the implementation of the plan based on the performance measures used for plan selection.
- In the PEIR, clarify which (if any) of the Strategic Projects are being modeled in the plan scenario. It is not clear from the existing documentation which projects were included at which stage in the modeling process.

Comments on the Public Health Process

- We commend the integration of Public Health into the development of the 2016-2040 RTP/SCS. In particular, we strongly support the new Public Health Appendix to the plan, and appreciate the hard work that went into the creation of this document.
- SCAG's Public Health Working Group has created a forum for public health professionals to engage with the plan and to advance work on the RTP, and the broader goals of the Public Health Work Program. SCAG's staff participation on the Alliance's Healthy Transportation Working Group has further built constructive engagement between transportation planning and public health and we commend and look forward to this continued participation.
- The Public Health appendix provides a primer explaining the Social Determinants of Health pathways through which planning and the RTP impact public health. We encourage SCAG to maintain the appendix as a living document and to include it in future RTP/SCSs to ensure future members and users understand these links.
- We applaud the inclusion of Safety and Health measures in the overall Plan Performance measures, particularly the "Daily amount of walking and biking related to work and non-work trips" and the "Collision rates by severity and mode." We encourage SCAG members to collaborate with SCAG, Public Safety, Caltrans, and Public Health Departments to improve the collection of data to track these metrics over time at a granular level. Data collection will be particularly important in tracking the impacts/ benefits of the plan to Environmental Justice communities where greater numbers of residents are reliant on active transportation modes.
- We appreciate the inclusion of healthy food access on page 4 of the Public Health Appendix. Given the importance of this topic to health, we recommend integration of healthy food systems discussions into the broader RTP/SCS. An example would be to consider the impact of the food system on goods movement; i.e., how can preservation of local agriculture and development of urban agriculture in the region reduce the greenhouse gas emissions from that sector?
- We also encourage SCAG to update the data analysis and performance measures included in the public health appendix, where possible, provide this data at a granular level through the REVISION tool and other public data portals. This will facilitate the development of strategies

and projects to advance public health supportive built environments while making it easier for member jurisdictions to incorporate public health analyses in their plans.

Comments on Scenario Planning Model Health Benefit Analysis

- We appreciate the effort on the part of the Strategic Growth Council, SCAG and others to develop the Urban Footprint Scenario Planning Model (SPM) Public Health Module as a tool for helping evaluate the health impacts of proposed scenarios.
- While there is room for the refinement of this tool both in terms of including a risk exposure pathway and in addressing member's concerns related to the land use codes, we think the Urban Footprint SPM Health Module is useful in providing a ballpark assessment of some of the health benefits that may come from the plan.
- We are encouraged by the estimated health benefits of the plan scenario, which projects a 2.5% decrease in the regional obesity rate, 3% reduction in share of population with high blood pressure and a 13% reduction in total annual health costs for respiratory disease.
- We encourage SCAG and its member agencies to capture the value of our investments in active transportation by purchasing bicycle and pedestrian counters, and investing in National Household Transportation Survey (NHTS) oversample for active modes for the entire region. Detailed tracking of the physical activity increases resulting from the plan are key to understanding health impacts as well as how injury rates are related to exposure.
- In future years as data investments such as automated counters improves the granularity of our bike and walk mode share and trip length data, we encourage SCAG to analyze health co-benefits by using a relative risk assessment tool such as the Integrated Transportation Health Impact Model (ITHIM).

Comments on Environmental Justice Appendix and Disadvantaged Communities

- The Environmental Justice (EJ) outreach process and analysis is significantly more robust in this 2016-2040 RTP/SCS than in prior years. Thank you for incorporating the feedback we provided through the workshops and focus groups, and including the "Active Transportation Hazard" and "Climate Vulnerability" measures.
- We particularly appreciate SCAG's inclusion of multiple methods of identifying EJ communities. Due to the complex and localized nature of the issues EJ communities face, we would encourage SCAG to provide the detailed community-level analysis that is presented in aggregated form in the EJ appendix through a public data portal for use by individual communities.
- The Public Health Alliance has developed the "[California Health Disadvantage Index](#)" as a tool for identifying community disadvantage from a 'Social Determinants of Health' perspective. We encourage SCAG to consider the use of this tool for future EJ analysis, and as a layer for inclusion in future publicly available datasets on this topic.
- Given some of the unavoidable impacts of the plan on EJ Communities, we encourage SCAG to establish an ongoing process for elucidating and addressing these challenges in the region. A standing Environmental and Social Justice/Disadvantage Community workgroup could provide guidance for the integration of environmental justice/social justice/ disadvantage community prioritization processes in county and city-level transportation planning, ensuring that the project lists included in future RTPs have been developed with an eye toward more equitable transportation investment. Greater investment in disadvantaged communities' readiness will have the added benefit of increasing the competitiveness of the SCAG region in state funding competitions subject to SB 535 requirements.
- Displacement and gentrification are particularly important areas for action in the coming years. We appreciate the analysis of this issue in the EJ appendix, and its brief treatment in the Environmental Justice toolbox, however given the enormous affordable housing deficit in our region, and the trend of the displacement of transit-captive populations from the most transit-accessible urban core, more action on displacement will be necessary in order to realize the

VMT-reductions promised by our transit investments. We encourage SCAG members to convene a task force specifically dedicated to this issue. Because transit investment is a proven driver of displacement, this task force should seek to develop a fiscal structure for ensuring that the added land value of transit investment is captured for the development of affordable housing, with the minimum goal of achieving a 'no net loss' of affordable units within High Quality Transit Areas.

- The 2015 County of Riverside Community Health Assessment, which involved community forums and surveys, both homelessness and housing affordability surfaced as high priorities for residents. The fear of displacement is also a concern for residents of San Bernardino County. Strategies to address housing affordability should take the entire region into account.
- The EJ analysis should explicitly align the discussion with the Social Determinants of Health and the Public Health appendix, as there is no mention of the concept throughout. Consider using the California Planning Roundtable's Social Determinants of Health paper as a resource to explain the connection between these two appendices for newcomers to the field.
- Given the pressing nature of inequity, displacement, and poverty in our region, we recommend greater integration of the performance measures and mitigation actions included in the Environmental Justice appendix within the main body of the RTP/SCS.

Detailed comments on Draft RTP/SCS main document:

- **Page 5 and page 39:**
Please update this sentence: *In Riverside County, the Healthy Riverside County Initiative is working to have healthy cities resolutions adopted by a minimum of 15 cities.*
To read: *In Riverside County, the Healthy Riverside County Initiative has formed a Healthy City Network to continue to successfully work with the county's 28 cities to enact Healthy City Resolutions and Health Elements into their General Plans.*
- **Page 16, #2: Collaborating with Member Agencies, Jurisdictions and Stakeholders:**
Please explicitly mention public health departments as one of the key stakeholders, modifying the fifth sentence in that section to read: *The Agency will also have to work with key stakeholders including local public health departments to ensure...*
- **Page 20, Categorizing Land Use:** Rural development, which is neither suburban nor natural lands, does not fall into any of the listed categories. We would appreciate either a clarification of which of the categories rural land uses fall under, or a new, separate category addressing rural development.

Thank you for taking the time to consider our comments.

Sincerely,



Susan Harrington M.S., R.D.
Director, County of Riverside
Department of Public Health
Co-Chair, Public Health Alliance
of Southern California
sharring@rivcocha.org
p. 951.358.7036



Selfa Saucedo, MPH
Manager, Public Health and
Behavioral Health Depts.
Ventura County Health Care
Agency
Co-Chair, Public Health Alliance
of Southern California
Selfa.saucedo@ventura.org
p.805.677-5231



Tracy Delaney Ph.D., R.D.
Executive Director,
Public Health Alliance
of Southern California
tdelaney@phi.org
office: 619.452.1180
direct: 619.722.340