

Our Experience with the RTP Guidelines Update Process

Submitted by ClimatePlan, Safe Routes to School National Partnership, Public Advocates, California Pan-Ethnic Health Network, California Bicycle Coalition and PolicyLink

Our organizations represent a broad statewide constituency that supports inclusive, transparent, and accountable regional planning. Our experience has consistently demonstrated that good regional planning is crucial to protecting our environment, strengthening our economy, and improving the health and well-being of all the residents of our regions, including the most disadvantaged residents and neighborhoods. We submitted written comments on the RTP Guidelines update [process itself](#),¹ a list of [guiding principles](#)² and comments on the [first](#)³ and [second](#)⁴ drafts. We also proposed draft language, including [a proposed new chapter](#)⁵ on civil rights and Environmental Justice in regional planning and language and case studies for the public health and planning practice example appendices. We actively participated in workgroup meetings and on many calls with staff and other stakeholders in this process. Overall, over two dozen organizations focused on transportation, housing, land use, environmental, social equity and related issues participated directly in this process at some point. Many others, through convenings hosted by one of our groups in Los Angeles, Fresno and Oakland, provided their input indirectly.

We saw significant progress in the latest update to the RTP Guidelines, notably

- **The first-time inclusion of language on public health.** Appendix K was required by legislation that passed a few years ago (AB 441, 2012), and CTC supported our recommendations for topics, case studies and other significant language.
- **The addition of language on active transportation, complete streets, and first/last mile issues.** The sections dealing with pedestrian and bicycle issues are significantly improved, including new language on complete streets, Safe Routes to School, and first and last mile issues.
- **The inclusion of stronger language on civil rights and environmental justice, and on public engagement strategies.** While not all of our recommendations were incorporated, Chapter 4, the RTP Checklist and other parts of the document have been significantly strengthened over the 2010 Guidelines (which included only a few sentences on Title VI).
- **The creation of a new chapter dedicated to performance management (Chapter 7).** Performance measures are tremendously important for tracking our progress toward a variety of state and federal goals.
- **Creating a new Appendix (L) on Planning Practice Examples:** A significant change in this draft is that all the Best Practices have been moved to a new Appendix called “Planning Practice Examples.” While we have some concerns with this reorganization,” we hope that it will allow for a more robust list of planning practices than the original Guidelines document would allow. Many of the planning practices identified in ClimatePlan’s recently issued [report](#),⁶ entitled “Leading the Way,” were included in Appendix L.

However, we were concerned with many parts of the process, including the following:

- **The expedited nature of the process itself.** The update process was unnecessarily rushed, starting in June and wrapping up in December with very tight deadlines. Our first comment letter called for an extension to the process to allow for more robust public participation and feedback. Many of the groups that worked with us felt constrained by other commitments and could not participate as actively as they wished (particularly given that the CTP Guidelines were being developed concurrently). The workgroup meetings required an all-day commitment on multiple occasions, often in Sacramento and far away from communities/regions impacted by the RTP Guidelines. We understand the constraints that CTC staff was under and appreciate their hard work, but more time would have resulted in fuller discussion, greater public engagement, and a better set of Guidelines together.

¹ Letter dated June 29, 2016:

http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/6StakeholderGroupCommentLetter_June29.pdf

² Letter dated July 17, 2016:

http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/7StakeholderGroupGuidingPrinciples_July17.pdf

³ Letter dated August 5, 2016: http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/6StakeholderGroupCommentLetter_Aug5.pdf

⁴ Letter dated October 14, 2016: http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/sepcomments/8Coalition.pdf

⁵ http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/3PublicAdvocates_July25.pdf

⁶ <http://www.climateplan.org/new-report-leading-the-way-on-strategies-for-a-more-sustainable-california>

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- **The failure to engage community residents.** As we raised in our very first comment letter, meaningful engagement and intentional outreach to seek feedback from residents and leaders of low-income communities, and community-based organizations serving those residents, is a fundamental component of developing strong policy and maximizing the benefits of our state and regional transportation systems. While the workgroup meetings have been an important forum to facilitate feedback from stakeholders, many low-income communities face barriers to participation. Going forward, the CTC must make a far greater commitment to a public participation process that provides the time and opportunity for community residents to engage directly and develop thoughtful feedback, given the technical and comprehensive nature of the plan.⁷
- **Consensus building with other partners:** Overall we worked well with other stakeholders in the workgroup process, and appreciated staff's effort to address our concerns through a consensus based process. However, this consensus-based process also severely limited the RTP guidelines from being able to fully achieve alignment with California's climate, equity, and health goals. The guidelines should have been shaped in equal part by both the "practitioners" and the "consumers" of regional planning; in practice, the former were given a privileged role that enabled them to block consensus on important content. That meant that key provisions such as SB 743 implementation or SB 375 practices were not included in the new guidelines. While some of these items were ultimately included in the Appendices, for future guidelines, we believe our climate, equity, and health goals should be prioritized for inclusion, given the impact that MPO planning has in these arenas.
- **Little mention of housing issues:** Many of our regions are facing significant housing pressures, or at risk of future housing pressures as populations move around the state in search of more affordable housing. Originally, staff stated that housing issues, including federal fair housing guidance, would be reflected in the SCS chapter; ultimately, that language was put in an appendix. We submitted other important comments on the lack of mention of affordable housing, gentrification and displacement in the RTP Guidelines, and are disappointed that the final version does not address these topics adequately, relegating most of the discussion to "Addressing Housing Needs in the SCS in Chapter 6."
- **Removing references to legislation directed at state and local agencies.** We are disappointed that many references to state laws affecting climate change, housing, transportation and other issues were removed because MPOs felt they did not impact RTPs. Consistency between local, regional and state plans is a major issue in our state, a concern highlighted by several state agencies in this process, yet the Guidelines do little to promote that consistency.

While we appreciate staff's hard work and the opportunity to work with a diverse set of stakeholders to strengthen the guidelines, the overall process felt incredibly limiting in terms of what we could have achieved with this guidance. Right now, we are a leader to the nation in how we address climate change, promote social equity, improve public health, and transform our transportation system. We believed the RTP guidelines could be another place where California would be a leader and provide an impetus for regions to build upon their ambitious RTP/SCSs. Unfortunately, these guidelines - even with the addition of the appendices - continue the status quo.

In closing, we are committed to working with both the commissioners and staff to ensure that going forward, CTC works more effectively to align transportation investments and guidance documents with promoting California's ambitious climate goals and our state's commitment to equality of opportunity and to fairly shared benefits and burdens.

⁷ Further, if staff from organizations could not attend meetings after submitting recommendations for the guidelines, then often times their input was removed from the document if others attending the meeting asked for it to be taken out. This was problematic.