



ClimatePlan



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April 20, 2020

RE: Comments on Proposed Final Draft of *Connect SoCal 2020-2045 Regional Transportation Plan and Sustainable Communities Strategy*

Position of adopting final draft: (oppose adoption, request a federal extension)

In January, Safe Routes Partnership worked with 16 other regional organizations to [submit comments](#) on the Connect SoCal draft. Our comments included increased active transportation investments, stronger metrics for community engagement, set aside investments for environmental justice planning, and more accessible data--just to name a few. In early March, [staff released a report addressing public comments](#) explaining any changes to the RTP/SCS. Unfortunately, many of the comments that we submitted collectively with 16 organizations were not adopted into the plan, with only minor changes made, and the reasoning was insufficiently addressed in the staff report.

In addition to our previously expressed comments, we are also now concerned about potential COVID-19's impacts on Connect SoCal's goals and strategies. Local agencies are now exhausting all efforts to address public safety and take measures to keep communities safe. The pandemic will have long-lasting impacts on our region both from economic and public health standpoints.

The specific impacts of COVID-19 are uncertain. Rough estimates show that public transit ridership has declined up to 90%. This will negatively impact fare revenue, while dramatic declines and sales tax revenue will further harm transit services. While the federal stimulus package has provided some funding for transit, we know this funding will not be enough. However, we need to acknowledge that the communities that will be the hardest hit from the pandemic will be environmental justice, under-resourced, communities of color, houseless and incarcerated communities. For example, many news outlets including [the Los Angeles times reported a study](#) concluding that air pollution exposure triggers higher fatality rates of COVID-19. Given the evidence of air pollution's link to more serious cases of COVID-19, we need to take stronger measures to address environmental injustices that will lead to health disparities. Furthermore, we have seen an unprecedented amount of community members seeking unemployment. This leads us to believe we will be hit economically in ways that will make it harder for families to take care of each other and maintain a stable income. Therefore, we need to ensure we are making land use decisions that ensure jobs are accessible in local communities. This means we need to revisit existing transportation planning, environmental justice and public health strategies.

Adopting Connect SoCal without revisiting the plan to consider current public needs would be a mistake. We recommend SCAG should request a federal extension before adopting Connect SoCal. We acknowledge that federal transportation funding and state compliance requirements are tied to the update of Connect SoCal. However, we believe an extension should be granted on the grounds of the current pandemic. Many other planning processes and grant applications are considering extending deadlines, such as Cycle 5 of the Active Transportation Program. We believe SCAG staff should revisit the plan to ensure that priorities and projections still make sense to support a healthy regional future.

We know this may be a big task to take on and whether or not the plan is adopted on May 7th, we ask that addendums to the plan include the following policy recommendations:

- 1. SCAG staff should provide community engagement opportunities to better understand needs and priorities:** Much like the outreach workshops that were conducted in Summer 2019, SCAG should use virtual platforms including social media, video conferencing, and other public comment online options. Follow up with communities on the progress of Connect SoCal is critical and this avenue can provide an opportunity for feedback regarding shifting priorities due to COVID-19.
- 2. Expand the definition of “transportation safety” to include emergency preparedness strategies:** Active transportation and transit projects should have an emphasis on public health safety. These strategies should include expanding policies: 1. Support effort to increase fares waivers for our most vulnerable communities during and after the pandemic is over (student and under resourced community passes), 2. Ensure hand washing stations and other public safety measures are installed during and after the pandemic, 3. Encourage agencies to enact policies to protect bus drivers, 4. Support assessments that analyze first last mile projects near essential businesses like grocery stores and medical/hospital facilities.
- 3. Increase funding for public health strategies, environmental justice and community resilience planning:** SCAG should support agencies by funding projects that focus on local resiliency and emergency planning through the Sustainable Communities Program. Given the current pandemic and climate crisis, we support a set aside of dedicated funding for these efforts.
- 4. Increase the investment in active transportation projects and transit:** Across the country, the pandemic has demonstrated the importance of walking, biking, and transit connections to key destinations. Bicycling and walking rates are up as families use it to get around and get physical activity, and we are seeing food and meal deliveries taking place by bike. Transit is a critical link to jobs particularly for low-income families, many of whom have been providing essential services during this crisis. To deal with the reduced fare box revenue and increased expenses from cleaning, transit providers need more resources moving forward.

From a public health standpoint, we see the need to invest in stronger regional networks of transit services. In the last month, the City of Los Angeles and its surrounding areas have had the *longest* consecutive days of clean air since 1980. Several media outlets are reporting cleaner air days are due to the decrease of drivers on the road during the stay at home ordinance. We need to keep up the momentum of less driving and the clear air days we’re experiencing right now. In order to keep up this good momentum, we need to expand options for SoCal residents, quickly phase out active transportation and transit projects and expand regional transit connectivity. We urge SCAG to revisit the funding allocations moving forward and reiterate our call that 5 percent of the plan’s budget go to active transportation projects, with a priority for improvements in

communities of concern, and that more transit investments be made in high per-capita affordable housing target areas.

5. Fare free services: In this crisis, taking fares from riders is downright dangerous to transit operators and passengers who need to be practicing social distancing. Right now, the Alameda-Contra Costa Transit District (AC Transit) and Santa Clara Valley Transit Agency have both waived fares for services. Within SCAG's region, Omnitrans in San Bernardino County has also taken similar steps to provide fare free relief services by providing rear door boarding and have not been collecting fares from riders during this time. Other agencies need incentives to do this, the federal stimulus for transit could help provide some of those incentives. In the longer run, fare-free services are going to be a lifeline for those looking to get back to work, interviews, postponed medical appointments, and school.

6. For matters of public health safety, SCAG needs to invest more in housing density and not invest in sprawl for suburban and rural areas: Urban sprawl and poor land use development impact air quality, biodiversity and encroach upon ecological systems. As more human activity encroaches upon ecological systems including wildlife, infectious diseases will be more common. We fear that there may be a growing sentiment to support sprawl development in an effort to spread out housing and physically distance communities. However, urban sprawl is not the answer to pandemic prevention, it facilitates the development of infectious diseases. The Guardian reported on the spread of COVID-19, stating, "Human encroachment into biodiverse areas increases the risk of spillover of novel infectious diseases by enabling new contacts between humans and wildlife." Rampant development projects destroy habitats for wildlife especially in rural areas such as the Inland Empire, Orange and Los Angeles' unincorporated areas. Sprawl devastates biodiversity of flora and fauna, while putting human health at risk.

Furthermore, sprawl will increase VMT, and disconnect communities from existing transit networks. Developing in less dense areas will result in adverse health impacts, as people travel further and increase GHGs in our air. Legislative bills like SB 375, help us remain accountable to maintaining low levels of GHG, pollutants that have been known to cause devastating health impacts for the entire region. Developing sprawl in outlining areas threatens our ability to remain in compliance with SB 375. As Disease Ecologist Peter Daszak recently said about rampant development in an interview with *Democracy Now!*, "We've got to reassess our relationship with the environment and reduce our ecological footprint. It's to the benefit of conservation. It'll reduce climate change. It will also stop us from getting sick."

7. SCAG needs to elevate the importance of affordable housing within Connect SoCal: The COVID-19 crisis highlights the importance for the region of developing a proactive program for the development of affordable housing both for reducing the economic vulnerability to the pandemic of the families of our many essential workers and reducing the unprecedented crisis in

persons experiencing homelessness in California. Our low income and homeless populations are among those most vulnerable to viral pandemics and it is vital to all of our communities that we not allow our affordable housing crisis to continue. Indeed, expanding the supply of affordable housing, especially when built near transit services, is one of the key measures needed for reducing both air pollution and GHG emissions, essential to a successful SCS under SB 375. Yet the plan identifies a mere \$3 B in tax increment financing for “transit supportive housing related infrastructure needs to enable housing development” and “\$50 million to implement their 6th cycle RHNA allocation.” In short, while Connect SoCal envisions over \$630 B in transportation investments, it can envision nothing whatsoever for the production of affordable housing itself despite the fact that affordable housing comprises 58% of the Regional Housing Needs Allocation and is essential to a successful SCS. This should be corrected.

In Conclusion:

We understand the critical importance of Connect SoCal and how it shapes planning for our region’s future. We’ve followed this update process since the beginning and have been invested in seeing the process materialize into a plan that truly meets our region’s needs. We need to acknowledge that it is very possible that our needs have shifted. We know that the future feels so uncertain right now and many of our communities are hurting. We urge SCAG to consider revisiting Connect SoCal and ensure we are prioritizing strategies that will lift us up.

Sincerely,

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