



July 17, 2015

Ma'Ayn Johnson
 Land Use and Environmental Planning
 Southern California Association of Governments
 818 West 7th Street, 12th Floor
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Dear Ms. Johnson,

SCAG's Environmental Justice (EJ) Analysis is an opportunity for both policymakers and the public to understand the impact that regional transportation investments and land use decisions have on low-income people and communities of color. The aim is to take action to avoid having these groups shoulder a disproportionate share of the negative impacts and to ensure they get a fair share of the benefits of these public investments. We also commend SCAG for improving the EJ Analysis and its willingness to incorporate new approaches as SCAG prepares its 2016 update to the RTP/SCS.

We support a number of ideas SCAG staff has presented since the EJ workshop in November 2014.¹

These ideas include:

- Adding EJ performance measures to the core performance measures and including them in scenario planning²;
- Including Active Transportation Hazard as an EJ performance measure;
- Including maps of EJ census tracts & SB 535 disadvantaged areas and of PM 2.5 exposures for two different time periods;
- Including the SF Bay Area MTC's "Communities of Concern" as a possible model for EJ monitoring;
- Integrating "co-benefits" of water, energy and local fiscal impacts in Resource Efficiency;
- Adding vehicle miles traveled & mode share for work and non-work trips as a performance indicator for Location Efficiency;
- Adding jobs supported by transportation investment as a performance indicator of Economic Well-Being; and,
- Adding localized analysis of gentrification/displacement.

We have the following general recommendations for improving the EJ Analysis:

- **Communities of Concern.** The EJ Analysis would be strengthened by a Communities of Concern" approach, implemented through a strong public process, that focuses on identifying disparities between disadvantaged communities, as identified in the CalEnvironScreen, and the region. Such an analysis should have snapshots over time so that trends can be identified.
- **Visuals and Maps.** We encourage SCAG to use in the final document more visuals and maps to illustrate community impacts, as they communicate more effectively than data tables.
- **More Meaningful Geographies.** We find that given the size of our counties county-to-county comparisons are not particularly revealing or meaningful for addressing EJ issues. We encourage SCAG to conduct a separate analysis of subregions with particular EJ issues to illustrate the various challenges the region faces. We also support setting specific goals on metrics, rather than calling for "improvement over baseline."
- **EJ Toolbox.** Finally, we encourage you to strengthen the EJ Toolbox to give local governments an easy reference to policies and programs available to mitigate disparate impacts.
- **Tools and Models:** We would like to see a broader range of tools and models used to assess impacts on EJ communities.
- **Scenarios.** Analyzing and addressing the impacts on low income communities and communities of color under each of the different scenarios.

In addition, we have the following more detailed recommendations by issue area.

1. Active Transportation

- **Set a percentage hazard reduction goal** and consider the principles of Vision Zero aiming to reduce the number of pedestrian and bicycle fatalities to zero. Include the list of cities with Vision Zero policies in the region in the EJ Toolbox.

- **Use SWITRS/TIMS data on injury and fatality rates** for active transportation hazard, separated out by pedestrians and bicyclists.
- **Use rates of walking and bicycling to school**, transit and community-identified priorities for Active Transportation Hazard and Safety & Health.
- **Analyze miles of bicycle, quality of sidewalks** and quality of crossings in relation to income of communities; and
- **Analyze availability of active transportation infrastructure in small urban / rural communities**, including sidewalks, bicycle lanes, multi-use paths, safe crossing, etc. Include access to bike ownership as a metric to for communities that have no access.
- **Analyze multi-modal transportation options** available in “Communities of Concern” in a way that illustrates the diversity of challenges facing urban, suburban, and rural communities.
- **Analyze efforts to collect data** on qualitative safety concerns not captured by collision data, such as personal security concerns (gangs, violence, etc.), lighting, aggressive dogs, etc.
- **Analyze rates of walking and bicycling** to work and non-work destinations in relation to income of communities and proximity to jobs.
- **Analyze barriers to active transportation and public transit.**

2. Job-Housing Mismatch

- **Use a different methodology that captures the mismatch within counties.** The analysis of inter-county vs. intra-county commuters used in the 2012 RTP did not shed light on the lack of homes for rent and purchase at affordable prices near jobs that seems to be at the root of our region’s long commutes. UC Davis has mapped the ratio of low-wage jobs to affordable rental housing for the whole state. An analysis of these maps for the SCAG region could help with evaluation of the effectiveness of the Sustainable Communities Strategy.
- **Use modeling tools that capture differences in vehicle miles traveled (VMT)** among different economic and racial segments of the population with particular focus on low-income, underemployed and unemployed workers in “Communities of Concern.”

3. Accessibility to Employment, Schools, Services & Parks

- **Map the job density.** The Center of Neighborhood Technologies Employment Gravity Index measures access to jobs. Having a map can help us understand where the underserved areas are rather than relying on countywide or region-wide averages.
- **Include walking as mode to access schools, services and parks.** For low-income families walking is an important means of transportation that we want to encourage. Being able to walk to a neighborhood park can provide more regular opportunities for physical activity than infrequent 45-minute rides by car to a state or national park.

4. Dig Down on “Environmental Justice Communities”

- **Analyze specific geographic areas and provide analysis over time.** Use San Francisco Bay Area’s “Communities of Concern” as a model.

- Supplement regional maps with local scale maps (at least on-line). Only using data at the county scale obscures the disparate impacts that happen within counties, when the EJ Analysis is aimed at identifying those exact disparate impacts.
- Provide analysis. Maps and charts are no substitute for calling out trends, to identify both success and areas of concern.

5. Gentrification & Displacement. The 2012 EJ analysis encompassed the time frame of the 2008 real estate collapse, and not surprisingly, found inconclusive evidence of displacement. To further refine this analysis, we recommend:

- Disaggregating region-wide data for areas around transit and HQTAs to allow an analysis of the differences in the strength of the real estate market in coastal California which is a key factor in displacement;
- Focusing on specific geographic areas with high concentration of low-income people (Communities of Concern);
- Including changes in housing tenure (renters and owners), race, ethnicity and income over time;
- Including changes in rental prices and home prices over time;
- Number of new apartments or homes with affordable rents or sales prices;
- Number of apartments lost through demolition, "Ellising," and conversions of apartments to condominiums;
- Isolating where possible the effects of transportation system development on local real estate markets in order to understand more clearly the diverse drivers of gentrification and displacement.

6. Analyze County Transportation Plans Using the EJ Performance Measures.

7. Create and adopt more specific performance targets that strengthen the performance metrics.

More progress on performance measures could be made if a target/goal were included for each metric.

8. Stratify rural data, and provide separate rural analysis. The SCAG region is a diverse region that includes both rural and urban communities, and areas with well-developed transit and active transportation networks and those without. Given the specific environmental justice challenges facing the region's rural communities, the performance measures should be stratified by and separately address rural areas, and provide separate analysis of each measure in these areas.

9. Provide a more comprehensive cost benefit analysis of transportation to EJ Communities

- Tax burden of RTP/SCS revenue sources. Expand this metric to include not just tax burden, but total transportation and housing cost burden, as well as benefit, by income quintile, race and geography. To the extent possible, this metric should include cost and benefit of informal transportation use, including ridesharing and taxis.
- Impacts of proposed VMT fees.
- Include metrics that address EJ communities in small urban / rural communities such as access to public and private transportation.
- Include analysis of the impacts of proposed large-scale, low-density residential projects on Communities of Concern.

10. Include race/ethnicity in air quality health impacts along freeway & highly traveled corridors.

Scientific research indicates that the relationship between pollutant exposure, stress, and health

outcomes can vary based on the race and ethnicity of the residents. Given the specific relationship between race/ethnicity and pollution burden the EJ analysis of health outcomes and pollution burdens needs to be disaggregated by race/ethnicity. Analyze the proximity of air quality monitoring stations to low-income housing, public schools and Communities of Concern.

11. Climate adaptation and resilience.

- **Include an EJ performance measure on climate adaptation.** Possible measures for inclusion could include a map of tree canopy, access to air conditioning, identifying specific sub-regions that lack sufficient public parks.
- **Expand EJ toolbox** to include climate resilience strategies such as: urban forestry integrated into built environment to increase tree and vegetative cover; creating cool/green roofs; using cool pavements; and coordination of emergency response and transportation resources available to vulnerable communities and populations such as the elderly and the physically disabled.

12. Sub-regional analysis: Align the EJ analysis to a sub-regional level that provides a more detailed on-the-ground understanding of the environmental impacts borne by specific sub-regions.

Thank you.

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[1] Table 1: 2016 RTP/SCS Performance Measures (March 16, 2015 Draft) and Table 2: 2016 RTP/SCS Additional Performance Measures (March 14, 2015 Draft), SCAG Technical Working Group Agenda for March 19, 2015, Attachment 7.

[2] "2016 RTP/SCS Program Environmental Impact Report," Agenda attachment for Item #7, SCAG Technical Working Group, February 19, 2015.