

December 23, 2011

Board of Directors
Sacramento Area Council of Governments
1415 L Street Suite 300
Sacramento, CA 95814

Re: Metropolitan Transportation Plan/Sustainable Communities Strategy 2035

Dear SACOG Board of Directors:

We are pleased to offer our comments on the Draft Metropolitan Transportation Plan/Sustainable Communities Strategy 2035, and thank you for the opportunity to continue our involvement in planning for transportation and land use needs in the Sacramento region. The MTP/SCS moves the region in the right direction by focusing on meeting the needs of our growing population through compact growth, with a variety of transportation mode options, and with the needs of all communities in mind.

To ensure that all residents in the region have the opportunity to thrive, the transportation network must be planned for all users. It must include reliable, affordable access to multiple modes, including transit, walking, and bicycling. It must serve all of our neighborhoods, linking jobs, housing options at all income levels, services, educational institutions and opportunities for recreation.

The Coalition on Regional Equity (CORE) advocates for regional development that is equitable, sustainable and promotes public health for lower income people and communities of color in the greater Sacramento Region. The Coalition includes affordable housing advocates and developers, environmentalists, transportation advocates, homeless and anti-poverty advocates, social service providers, civil rights leaders and health groups. We have a vision for the Sacramento region that includes opportunities for all residents to live in communities rich with jobs, connected by transit as well as bicycle and pedestrian networks, accessible to services and recreation, and without threat that public investment will drive housing costs up and displace residents from their homes.

The Draft MTP/SCS makes strides toward achieving this vision of a sustainable, equitable region. However, we respectfully recommend that SACOG strengthen and enhance the equity provisions of the MTP/SCS that address the transportation and planning needs of low-income communities, communities of color, other vulnerable populations, as well as preserve our natural habitat. We believe SACOG should do so for two reasons: first, it will bring the MTP/SCS into better compliance with SACOG's state and federal legal and regulatory

obligations; second, more equitable transportation and land use planning will facilitate more robust and sustainable economic growth in the region.¹ CORE's recommendations to achieve this are as follows:

1. Promote Affordable Housing in All Communities

- Promote affordable housing in all parts of the region.
- To this end, add a Strategy to Policy 4 to prevent gentrification and displacement of existing residents from transit-rich areas. We suggest the following language: "Identify, support and incentivize best practices to prevent gentrification resulting in displacement of existing resident, including practices that stabilize existing renters and lower and moderate income homeowners; create new homeownership opportunities for low to moderate income households; facilitate comprehensive community benefits packages that include good jobs and land use provisions; facilitate income and asset creation in affected areas; and support neighborhood-specific measures to fund the preceding categories of action."²

2. Create a Jobs-Housing Fit Analysis Tool

- The importance of this tool, as specified in Strategy 4.3, cannot be over-emphasized.
- Use this new modeling tool to help create opportunities for people at all income levels to live where they work.

3. Meet the Needs of Transit Dependent Populations

- Add a Strategy (or multiple Strategies) to Policy 23 that specifically addresses the needs of the following transit-dependent populations: low-income people and youth under age 18. The Strategy should include improving transit services and options for low-income people and youth by employing the same mechanisms set forth in Strategy 23.1.
 - We suggest adding the following language: "Take action to lower fares, provide discounted monthly passes, and plan bus and other transit routes compatible with riders who work swing and night shift hours."
 - Specifically to address the needs of youth under 18, we suggest the following language: "Explore the creation of partnerships between school districts and transit providers to ensure that district and or public bus routes enable all K-12 students to get to and from school on time."
- Strengthen Policy 24 by revising it to read: "Ensure community outreach and service to low income and minority communities whose needs and concerns otherwise might be overlooked."

¹ Notable references on the linkages between equity and economic prosperity include *Just Growth: Inclusion and Prosperity in America's Metropolitan Regions* by Chris Benner and Manuel Pastor, and *America's Tomorrow: Equity is the Superior Growth Model* by PolicyLink.

² We refer SACOG to the tool for measurement and intervention developed by UC Berkeley's Center for Community Innovation described in *Mapping Susceptibility to Gentrification*, available here: <http://communityinnovation.berkeley.edu/publications.html> for further development of this strategy.

- Add a Strategy to Policy 24 that encourages transit agencies to consider and plan for the needs of low-income and other vulnerable populations in rural parts of the region, perhaps through stakeholder meetings, a speaker series or series of webinars.
4. Promote Transportation Equity for All, Including Transit Dependent and Choice Riders
- Transit service networks should connect communities in the region to opportunities to live, work, recreate, access services, and worship without the need for a private automobile.
 - Street networks should facilitate travel by all modes, necessitating prioritizing investment in pedestrian and bicycle infrastructure throughout communities and near transit stops.
 - Develop specific strategies to ensure appropriate phasing of transit and active transportation improvements with residential development. While SB375 only requires quality transit to be *planned* within the time horizon of the MTP/SCS for residential projects to meet the criteria for CEQA benefits, development built without transit inevitably becomes car-oriented, and it is difficult to reverse this behavior.
5. Prioritize Equity-Promoting Investments First
- Add a Strategy to Policy 24 similar to: “Restore transit service where cut due to budget constraints when financially feasible, with attention to restore and strengthen service to low-income communities and other areas where transit-dependent populations live.”
 - Add to Policy 28 a Strategy to fund equity-promoting investments first. We suggest the following language: “Funding in early years of the MTP should be directed to those projects that enhance equity in the region, laying the foundation for the remainder of the plan.”
6. Create an Equity Scenario in the Next MTP/SCS, or Integrate Equity in Every Scenario
- Strengthen the equity analysis for future plans by including an analysis to measure the impact of the plan on low-income communities, communities of color, and other vulnerable populations (Environmental Justice Communities) that live outside of the designated “Environmental Justice Areas.” Examining people, in addition to place, will help determine true impact on these populations.
 - Apply the jobs-housing fit tool to the analysis for the next MTP/SCS.
 - Track the equity performance of this plan to provide the analytical foundation for future plans.
 - Hold a series of conversations with equity partners to identify key planks of an equity scenario and how they can best be integrated into the next MTP/SCS scenario(s).
 - Create a defined public process for CEQA streamlining determinations. SB 375 gives the local jurisdiction the discretion for making the determination for what level of CEQA exemptions a project is qualified for within the MTP/SCS, but there is no mandate for a public hearing or review process for this determination. A public process must be established to ensure that equity, health, and environmental interests are adequately addressed.

7. Improve Ecological Impact Analysis and Include Strategic Planning for Habitat and Open Space Conservation

- The interests of equity, public health and compact transit-oriented development are best served by complementary planning for natural resource and open-space conservation. While we applaud the work of the Rural Urban Connections Strategy to analyze regional agricultural viability, considerations of habitat viability and opportunities for outdoor recreation and education could be improved to better serve the needs of the region.
- Coordinated conservation strategies and tools must be developed to aide adherence to the MTP/SCS urban footprint and provide ample opportunity for open space preservation.

We believe that these recommendations, if included in the MTP/SCS, will help the Sacramento region address the needs of all residents in a meaningful way. Strengthening the analysis of how the MTP/SCS will impact low-income communities, communities of color, other vulnerable populations, and natural habitat, as well as creating specific strategies to address the needs of these populations as the MTP/SCS is implemented, will create a more equitable, sustainable, and prosperous region.

We appreciate SACOG's leadership in moving the region towards a more sustainable and equitable future, and urge the SACOG Board of Directors to support the strengthening of equity measures and strategies in the MTP/SCS.

The Coalition on Regional Equity- and its member organizations throughout the region- are committed to supporting the ongoing planning and implementation of the MTP/SCS through this and future update cycles. We appreciate SACOG's willingness to work with us and our constituents on ensuring that equity and opportunity for all in the Sacramento region become a reality.

Thank you for considering our comments and recommendations.

Sincerely,

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