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Re: Regional Transportation Plan Guidelines Comments

Dear RTP Guidelines leads,

We greatly thank the California Transportation Commission (CTC), Department of Transportation (Caltrans), and the State Transportation Agency (CalSTA) for creating the RTP guidelines. The California Natural Resources Agency (CNRA) is especially invested in how these guidelines can support the State's climate adaptation goals as well as continue to encourage land use and transportation planning that protects our State's productive agricultural lands and recreational natural lands.

We also applaud staff efforts to include voices from governmental partners, community organizations, the private sector and academia. We greatly enjoyed listening to stakeholders' transportation needs. These public workshops improve CNRA's ability to be

responsive in our climate change efforts. CNRA is happy to continue to collaborate on these guidelines in any way that RTP Guidelines staff may find helpful.

Introduction

We have organized our comments into four categories. Section-I highlights climate adaptation in the RTP Guidelines. Section-II includes suggestions for advancing the State's broader environmental conservation efforts. Section-III includes new information, recently released from the White House's Council of Environmental Quality, regarding analyses conducted pursuant to the National Environmental Policy Act. Lastly, Section-III includes quick edits for names of agencies and definitions.

Section-I: Climate Adaptation in the RTP Guidelines

We thank the RTP Guidelines writers for offering a solid foundation for climate adaptation policy and implementation. CNRA wishes to further operationalize what climate adaptation means in the transportation context. We hope that this clarity helps land use and transportation planners, project managers, and engineers better incorporate these suggestions into planning, design and construction.

We suggest adding these sources of authority:

[Senate Bill 246](#)

Creates the Integrated Climate Adaptation and Resiliency Program in the Governor's Office of Research and Planning, as well as a climate adaptation clearinghouse that will include climate adaptation tools, research reports, funding opportunities, etc.

[Senate Bill 379](#)

SB 379 amends Section 65302 of the California Government Code to require a legislative body of a city or county to adopt a comprehensive, long-term general plan that includes a safety element. This safety element provides protection of the community from unreasonable risks associated with the effects of various geologic hazards, flooding, and wildland and urban fires. When creating this safety element, the legislative body shall consider advice provided in the Governor's Office of Research and Planning General Plan Guidelines and include a variety of sources of climate scenarios, including Cal-Adapt and the most recent version of the Adaptation Planning Guide.

As State Agencies begin to fulfill EO B-30-15's mandate to take climate change into account in all planning and investment decisions as well as climate adaptation legislation, we suggest adding the following tools. The following are guidance documents that serve as tools to incorporate climate change impacts into planning and investments:

- **California Climate Adaptation Planning Guide (APG)¹**
 - The California Natural Resources Agency, California Emergency Management Agency, with support from California Polytechnic State University- San Luis Obispo, and with funding through the Federal Emergency Management Agency and the California Energy Commission developed this guidance document. The APG provides a step-by-step process for local and regional climate vulnerability assessment and adaptation strategy development. The following are companion documents:
 - **APG: Defining Local and Regional Impacts²**
 - Provides a more in-depth understanding of how climate change can affect a community.
 - **APG: Understanding Regional Characteristics³**
 - Identifies climate impact regions, including their environmental and socioeconomic characteristics.
 - **APG: Identifying Adaptation Strategies⁴**
 - Explores potential adaptation strategies that communities can use to meet the varying needs.
- **State of California Sea Level Rise Guidance Document⁵**
 - The Coastal and Ocean Working Group of the California Climate Action Team (CO-CAT) developed the Sea Level Rise Guidance Document in 2013, basing its recommendations on the National Research Council's 2012 findings for anticipated sea-level rise and coastal impacts.
- **Addressing Climate Change Adaptation in Regional Transportation Plans**
 - Prepared by Cambridge Systematics, Inc. for Caltrans, the report provides information for both a basic user (MPO or RTPA conducting climate vulnerability and risk assessments for the very first time) and an advancer user (a MPO or RTPA that has experience and strong interagency, cross-sector partnerships in making these assessments and addressing them⁶).

¹ California Natural Resources Agency. *California Climate Adaptation Planning Guide: Planning for Adaptive Communities* (July 2012). Guidance document can be found here:

http://resources.ca.gov/docs/climate/01APG_Planning_for_Adaptive_Communities.pdf

² California Natural Resources Agency. *California Climate Adaptation Planning Guide: Defining Local and Regional Impacts*. (July 2012) Companion document can be found here:

http://resources.ca.gov/docs/climate/APG_Defining_Local_and_Regional_Impacts.pdf

³ California Natural Resources Agency. *California Climate Adaptation Planning Guide: Understanding Regional Characteristics*. (July 2012) Companion document can be found here:

http://resources.ca.gov/docs/climate/APG_Understanding_Regional_Characteristics.pdf

⁴ California Natural Resources Agency. *California Climate Adaptation Planning Guide: Identifying Adaptation Strategies*. (July 2012) Companion document can be found here:

http://resources.ca.gov/docs/climate/APG_Identifying_Adaptation_Strategies.pdf

⁵ Ocean Protection Council. *State of California Sea Level Rise Guidance Document* (2013) Guidance Document can be found here:

http://www.opc.ca.gov/webmaster/ftp/pdf/docs/2013_SLR_Guidance_Update_FINAL1.pdf

⁶ Cambridge Systematics, Inc. prepared for California Department of Transportation. *Addressing Climate Change Adaptation in Regional Transportation Plans*. February 2003.

http://www.dot.ca.gov/hq/tpp/offices/orip/climate_change/documents/FR3_CA_Climate_Change_Adaptation_Guide_2013-02-26_.pdf#zoom=65

Here are a number of plans that can also serve as tools to plan in light of climate change projections:

- **Safeguarding California: Reducing Climate Risk**⁷
 - Relevant to the RTP Guidelines, the 2014 report includes recommendations for how California’s transportation system can adapt to climate change.
- **Safeguarding California: Implementation Action Plans**⁸
 - In March 2016, the California Natural Resources Agency published an overarching strategy for, most relevant to the RTP Guidelines process, how the State’s transportation system can, and will, prepare for climate change. The implementation action plans also includes actions for how the land use and community development sector can, and will, prepare for climate change.

We suggest including one or two examples to show how state grant programs are operationalizing the Executive Order B-30-15’s mandate while also providing funding opportunities to local stakeholders and tribal governments. For example, we suggest adding the Strategic Growth Council’s Affordable Housing and Sustainable Communities grant program (AHSC) on page 187. Funded by the California Climate Investments, (formerly Greenhouse Gas Reduction Fund), AHSC awards points based on the grantee’s efforts to reduce GHG emissions and prepare for the anticipated changes in the environment. State agency reviewers are able to learn how MPOs are conducting vulnerability assessments of the transportation infrastructure and users of the system.

Understanding the connection between climate change and public health, Executive Order B-30-15 provides that “state agencies’ planning and investment shall be guided by the following principle: (3) actions should protect the state’s most vulnerable populations.”

We encourage Caltrans and CTC to highlight some of the State tools that can help identify the region’s most vulnerable populations. Tools such as Cal-Adapt, funded by the California Energy Commission, and CalEPA’s Urban Heat Island index, a way to measure differences in temperature between urban areas and their respective rural areas⁹, provide information on what California’s environment will be in the future. We also point to the Climate Action Team’s Public Health Workgroup’s subcommittee, the Heat Adaptation Workgroup’s report, *Preparing California for Extreme Heat: Guidance and Recommendations*¹⁰.

⁷ California Natural Resources Agency. *Safeguarding California: Reducing Climate Risk*. July 2014. http://resources.ca.gov/docs/climate/Final_Safeguarding_CA_Plan_July_31_2014.pdf

⁸ California Natural Resources Agency. *Safeguarding California: Implementation Action Plans*. March 2016. <http://resources.ca.gov/docs/climate/safeguarding/Safeguarding%20California-Implementation%20Action%20Plans.pdf>

⁹ To view the Urban Heat Island Index maps, click here: <http://www.calepa.ca.gov/UrbanHeat/>. To view Cal-Adapt, click here: <http://cal-adapt.org/>.

¹⁰ The workgroup used Cal Adapt to find that California’s urban and rural population centers face an average of 40 to 53 extreme heat days by 2050 and an average of 40 to 99 extreme heat days by 2099. Of note to MPOs, the report shows that urban heat islands compound these temperature increases, calling for a greater

Tools such as the Public Health Alliance of Southern California’s Health Disadvantage Index, the California Department of Public Health’s CalBRACE, and CalEPA’s Cal Enviroscreen 2.0 identify social and environmental indicators to help give a sense of how these climate change impacts will affect people¹¹. The California Department of Public Health’s Division of the Office of Health Equity’s Climate Change and Health Equity Team explains that climate change will disproportionately affect the very young, elderly, those with chronic diseases and disabilities, communities of color, immigrants, tribal nations, and those with limited resources, noting that existing health inequities will be magnified.

In response to these serious public health threats, we encourage Cal Trans to not only analyze these projected climate impacts to the department’s infrastructure, but also to the people of our State. As we encourage people to drive less and walk, bike, and take public transportation more, we need to ensure that bus and rail stops, streetscapes, bicycling and other active transportation facilities make these choices feasible and safe in light of the changing climate. One of the proven ways to prevent heat related illnesses and deaths and reduce the urban heat island effect is through urban greening and forestry.

Understanding the benefits from greening transportation infrastructure, EO B-30-15 provides that “natural infrastructure solutions shall be prioritized.” In order for MPOs and local planners to find ways to implement these solutions, we encourage the RTP Guidelines to highlight funding opportunities. CAL FIRE and CNRA both manage grant programs designed to boost and maintain the state’s urban tree canopy, build bioswales to capture and clean rain runoff, and increase regional and local resiliency and adaptability for climate change¹². State agencies recognize the connection between public transportation and nature. For example, Santa Monica Mountains Conservancy’s Proposition 1 Guidelines for ecosystem and watershed protection and restoration projects and urban creek protection and enhancement projects awarded applicants points for showing that the proposed project was located within 1 mile of public transit.

We hope that MPOs and ARB’s SB 375 team view these greening efforts as ‘GHG-reduction enablers’, understanding behavioral changes as a result from natural infrastructure investments. Simply put, we cannot expect one to walk down a hot concrete street in a compact, urban environment without experiencing adverse public health outcomes. We must try and make the built environment livable, particularly given the scientific data from the aforementioned tools.

need for urban greening and forestry strategies. Heat Adaptation Working Group, a subcommittee of the Climate Action Team. *Preparing California for Extreme Heat*. October 2013.
http://www.climatechange.ca.gov/climate_action_team/reports/Preparing_California_for_Extreme_Heat.pdf

¹¹ For an overview of the Public Health Alliance of Southern California’s HDI, click here:

<http://phasocal.org/ca-hdi/>; CDPH’s CalBRACE, click here:

<https://www.cdph.ca.gov/programs/Pages/CalBRACE.aspx>; CalEnviroscreen 2.0, click here:

<http://oehha.ca.gov/calenviroscreen/report/calenviroscreen-version-20>.

¹² For an overview of these grant programs, please visit CNRA’s website (here:

http://resources.ca.gov/bonds_and_grants/grant_programs/) and CAL FIRE’s website (here:

http://calfire.ca.gov/resource_mgt/resource_mgt_urbanforestry_grants#)

We applaud many of the local and regional governments' work in preparing for climate change. We thank ARB's 375 team for advancing sustainable communities, a foundation for improving the quality of life for Californians who both live within urban and suburban environments and those who work and live in rural areas.

Lastly, EO B-30-15 calls for state agencies to take climate change into account in their planning and investment decisions, and employ life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives. We suggest adding this language in Section 6.28 as well as Section 6.6 (Estimating Future Transportation Costs) and Section 6.7 (Asset Management).

We hope that these connections can lead to stronger partnerships, a fuller knowledge of state grant programs, and statewide success in meeting California's climate goals.

Section-II: Conservation Efforts in the RTP Guidelines

In light of the drought, climate change and a projected 50 million residents in California by 2050, operationalizing the State's conservation plans into the RTP Guidelines is crucial to protecting farmland and forests, securing our water supply, and ensuring that we build habitat corridors in a cost-effective manner.

The RTP Guidelines can include strategies to curb the construction of transportation infrastructure that will lead to sprawling development. For example, the people of the City of Sonoma approved an Urban Growth Boundary (UGB) in its General Plan¹³. Based on population projections and job forecasting, the UGB encourages the creation of walkable and bikable neighborhoods and protection of the natural environment and the town's thriving agricultural industry by directing future urban development inside the UGB. The people of Sonoma also want to improve the quality of life for residents, particularly low-income and transit-dependent residents (such as children, seniors and people with disabilities) by directing housing development into areas where services and infrastructure can be provided in a cost-effective manner.

Further supporting Caltrans's incorporation of the Environmental Goals and Policy Report, we wish to highlight three development goals, supporting local values of conservation of farmland and forests and open space:

1. Reduce land consumed for development 50 percent relative to today's trend by 2050;
2. Reduce vehicles mile traveled per capita at least 15 percent by 2020 and 25 percent by 2040;
3. Prioritize the conservation of high quality agricultural land (including rangelands¹⁴).

¹³ Read the General Plan Land Use's UGB language here: <http://www.smartvoter.org/2000/11/07/ca/sn/meas/S/>.

¹⁴ Read more in the Governor's Office of Planning and Research's Environmental Goals and Policy Report (*Draft*), November 2015, here: https://www.opr.ca.gov/docs/EGPR_Nov_2015.pdf.

Adopting strategies to achieve these development goals is crucial to improving Californian's quality of life, particularly as the State anticipates reaching 50 million residents by 2050. We hope that transportation agencies throughout the State will reinvent the way we get around from day-to-day, improving the quality of life for present generations and those that follow.

Still facing a drought, and facing changing rainfall and snowpack levels, the RTP Guidelines must include the California Water Action Plan¹⁵. The Brown Administration has used this Water Action Plan as the roadmap to put California on a path to sustainable water management. While the Water Action Plan may not instantly appear to connect with the RTP Guidelines, there are certain practices that help us capture and clean water such as permeable surfaces and trails with natural features. The Water Action Plan explicitly calls for State leadership on water conservation, placing a moratorium on new, non-essential landscaping projects at state facilities and on state highways and roads.

Lastly, we want to highlight the work that California Department of Fish and Wildlife and Caltrans has done on addressing habitat connectivity. While many think of the large-scale Highway 101 overpass project, we point to tools that can help speed along habitat corridor projects in a cost-effective way during the initial phases of project planning and design.

- **California Essential Habitat Connectivity Project¹⁶**
 - The Project serves as a planning tool for conservation and transportation, identifying essential connectivity areas (important areas for maintaining connectivity between large blocks of habitat).
- **Western Governors Association's Crucial Habitat Assessment Tool (CHAT)¹⁷**
 - This mapping tool identifies crucial habitats, designed to reduce conflicts and surprises while ensuring wildlife values are better incorporated into land use planning, particularly for large-scale linear projects.
- **California State Wildlife Action Plan, Transportation Companion Plan¹⁸**
 - The Companion Plans to the State Wildlife Action Plan provide information for connected, yet distinct, sectors. The transportation plan includes strategies, tools and information in order to protect and enhance California's habitats.

We are grateful to California Department of Fish and Wildlife, particularly Jennifer Garrison's research and analysis in her position as CDFW's liaison to Caltrans, for implementing the State Wildlife Action Plan in the transportation sector. We hope to see more connections between transportation plans and projects and habitat preservation.

¹⁵ California Natural Resources Agency, California Environmental Protection Agency, and California Department of Food and Agriculture. *California Water Action Plan: 2016 Update*. 2016. http://resources.ca.gov/docs/california_water_action_plan/Final_California_Water_Action_Plan.pdf

¹⁶ Caltrans and California Department of Fish and Wildlife. *California Essential Habitat Connectivity Project*. <https://www.wildlife.ca.gov/conservation/planning/connectivity/CEHC>

¹⁷ Western Association of Fish and Wildlife Agencies. *Western Governors Association's Crucial Habitat Assessment Tool*. <http://www.wafwachat.org/map>

¹⁸ California Department of Fish and Wildlife. October 30, 2015. *California State Wildlife Action Plan*. <https://www.wildlife.ca.gov/SWAP/Final>

Section-III: Council of Environmental Quality's NEPA Guidelines

We thank you for including a clear explanation for why the National Environmental Policy Act (NEPA) does not apply to the RTP Guidelines process. We trust that the CTC and Caltrans legal teams, who are more familiar with the responsibility to relay NEPA guidance to MPOs, can fully incorporate the Council on Environmental Quality's (CEQ) August 2016's NEPA guidance¹⁹.

On August 1, 2016, CEQ issued new guidance to assist Federal agencies in their considerations of the effects of GHG emissions and climate change when evaluating proposed Federal actions in accordance with the National Environmental Policy Act (NEPA) and the CEQ Regulations Implementing the Procedural Provisions of NEPA (CEQ Regulations).

In light of the ± 75 percent of federal transportation funding being allocated directly to MPOs and the remaining ± 25 percent being allocated through CTC, CNRA finds the CEQ guidance critically important to incorporating in Sections 5.1 and 5.2, 5.5, and 6.28. We understand the timing of the release provides a challenge to the RTP Guidelines staff and would be happy to collaborate with you on how we can better incorporate the White House guidance into the RTP Guidelines.

Section-IV: Names and Definitions

We thank you for your attention to detail throughout the proposed RTP Guidelines. Below are some updates to names, acronyms:

- Please replace Fish and Game with Fish and Wildlife (CDFW).
- Please replace California Natural Resources Agency to CNRA.
- Please include environmental justice in the brackets for positive outcomes instead of the brackets for negative outcomes on page 147.

Conclusion

Thank you for leading the effort to update the RTP Guidelines. As California continues to prepare for climate change and a growing population, we hope to further connect environmental conservation and public health funding opportunities, tools and plans. We welcome additional conversations with staff to address any questions you may have and to work together to find appropriate language.

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¹⁹ Council on Environmental Quality. *Memorandum for Heads of Federal Departments and Agencies*. August 1, 2016.
https://www.whitehouse.gov/sites/whitehouse.gov/files/documents/nepa_final_ghg_guidance.pdf