



May 15, 2014

Barbara Steck, Deputy Director
Fresno Council of Governments
2035 Tulare Street Suite 201
Fresno, CA 93721

Submitted via email: bjsteck@fresnocog.org

Dear Deputy Director Steck:

On behalf of the undersigned health and medical organizations, we are writing to provide our input into the Fresno Council of Governments' (COG) draft Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and draft Environmental Impact Report (DEIR). We appreciate the COG staff have solicited and taken health organization input into this plan over the past two years and look forward to working with you as the final plan is developed.

Our organizations are committed to the successful implementation of SB 375 because we believe that land use and transportation planning must be better aligned to support healthier Fresno communities and avoid ongoing health burdens. Three recent reports underscore these challenges and that urgent action is needed to improve and protect the health of Fresno residents. While not the solution on its own, the Fresno COG's SB 375 process is at the heart of each of these reports and is a critical component of a healthier future:

1. **The American Lung Association's *State of the Air 2014***¹ report released on April 30th found that the metropolitan Fresno area is the most polluted city in the United States for particle pollution, and the fourth most polluted city due to ozone pollution. Reductions in vehicle trips through more efficient, compact land use decisions, coupled with strong investments in healthier transportation options that serve our existing communities' needs first, are critical to improving air quality and lung health in Fresno, where asthma affects over 20 percent of our children. The American Lung Association in California also recently reported that Fresno County residents could avoid 4,600 asthma attacks, nearly 800 lost workdays and over \$80 million in health costs

¹ American Lung Association. *State of the Air 2014*. April 2014. www.stateoftheair.org

in 2035 due to traffic pollution if the County grows in a more walkable, sustainable manner compared to business as usual planning.²

2. The California Department of Public Health and the California Conference of Local Health Officers released the annual *County Health Status Profiles* report on April 7, 2014.

Unfortunately, these results show that Fresno death rates for lung cancer, heart disease and stroke, and diabetes are all above the state average, with the death rate due to diabetes ranking as fourth worst in California. Cleaner air choices, and more active, walking, biking and transit-accessible neighborhoods are key to providing residents with opportunities to weave more physical activity into their daily lives to help cut down on such troubling chronic disease impacts.³

3. The United States Global Change Research Program's *National Climate Assessment*⁴, released on May 6, 2014 paints a stark picture of climate change impacts across the country, and specifically calls out severe and wide-ranging health impacts of climate change that have particular relevance to the Fresno area, including increased ozone pollution and allergen production and resulting asthma and respiratory health impacts, as well as increasing drought impacts on Valley fever. Further, the report notes risks to California's agricultural crops and impacts to farming communities. Reductions in transportation emissions through strong SCS plans will lessen climate impacts and reduce the tailpipe ingredients of ozone pollution.

SB 375 and the Sustainable Community Strategy should provide Fresno County residents with a vision for a healthier future with cleaner air, less chronic illness and a more sustainable climate. As noted in the health organization letter submitted to the COG on November 19, 2013, the selection of Scenario B as the foundation for the draft RTP/SCS was disappointing as that choice performed the weakest on key performance measures, including walk, bike and transit options, vehicle miles traveled and long-term greenhouse gas reductions. While disappointed in that vote, we believe that the COG and staff are committed to additional policies and programs to improve community health and we offer the following recommendations to support a healthier future for Fresno County.

1. The Council of Governments, in coordination with local planning and health departments and other stakeholders, should conduct a needs assessment of community health and healthy neighborhood infrastructure needs of existing Fresno residents. Also, the needs assessment should be followed up with a plan and timeline for addressing the needs identified in the report. While discussion about this needs assessment is occurring and moving through the COG committee process, the commitment to this needs assessment should be clearly stated in the SCS plan. As discussed at several COG, committee and sub-committee meetings, a critical first step in improving health in our communities is to evaluate where they are falling short in meeting residents' needs. We believe that the SCS plan can best support the health of Fresno County residents if this needs assessment is conducted in the first twelve months after plan adoption. We appreciate that the COG has programmed funding to begin this process and believe that incorporation in the final plan and action to carry out the assessment in the coming year will ensure this remains an ongoing priority during plan implementation.

² American Lung Association in California. *Public Health Crossroads: Fresno County*. March 2014. www.lung.org/california

³ California Department of Public Health. *County Health Status Profiles*. April 7, 2014. <http://www.cdph.ca.gov/programs/ohir/Documents/OHIRProfiles2014.pdf>

⁴ United States Global Change Research Program. *National Climate Assessment*, (Human Health, Southwest Region Chapters). May 2014. <http://nca2014.globalchange.gov/>

2. The RTP/SCS should place top priority on investing resources in making existing communities more sustainable, where needs are greatest pursuant to the results of the needs assessment, and should include a specified minimum funding level for active transportation projects in these neighborhoods. Currently programmed active transportation projects and funding fell well short of the budgeted amounts. The first priority for the RTP/SCS funding should be to invest in existing communities' transit, road, active transportation, housing and other infrastructure needs rather than funding new growth areas. In order to ensure this happens, the Policy Chapter (Chapter 6) of the RTP/SCS should include clear commitment to create the Sustainable Planning and Infrastructure Program proposed by community organizations and approved through COG advisory committees in May for allocating funding per the results of the needs assessment.⁵ The Sustainable Planning and Infrastructure Program process should look at every opportunity to provide more residents, and especially our most disadvantaged communities with the lowest household transportation budgets, with more, and more cost-effective, reliable and safe transportation choices, affordable housing, safe routes to schools and other basic municipal services. We strongly support moving forward with the City of Fresno's Bus Rapid Transit project to revitalize the urban core, but we must also allow for similar high quality mobility strategies to be funded in communities throughout the County, where sidewalks, bike lanes and more basic transit service could produce significant benefits. As with conducting the needs assessment described above, the final plan should include clear policy element language to ensure this program is developed, funded and implemented within the context of this RTP/SCS.

3. Support Integration of Clean Transportation Vehicles and Infrastructure In Land Use Planning

In addition to including the needs assessment and Sustainable Planning and Infrastructure Program specifically in the Policy chapter (Chapter 6: Policies: Foundation of the Plan), we recommend that the policy element of the plan clearly support the use of low- and zero-emission vehicles, deployment of zero emission vehicle infrastructure, and development and deployment of zero- and near zero emission freight technologies to reduce diesel particulates and black carbon pollution that harm health, shorten lives and compound our climate challenges. Specifically, language on clean freight should be added to Table 6-1G referenced above, or added into Table 6.6B:

Provide special consideration to transportation projects that improve the operational efficiency of goods movement and air quality, including those that support the development and utilization of near zero and zero emission technologies to better protect local communities and our environment.

Thank you for considering our input throughout this process and specific to the draft 2014 RTP/SCS. We look forward to working with the Fresno COG board and staff to develop and implement a final plan that improves health, air quality and our environment, especially in our most disadvantaged communities, while meeting the region's evolving transportation and housing needs.

⁵ At present, language in Chapter 7 of the draft plan expresses COG's commitment to work to develop such a program in the future, but this program does not appear among the policies COG will adopt to implement the plan.

Sincerely,

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