

Appendix B.
Equity and Environmental Justice
Recommendations Memorandum

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Equity and Environmental Justice Recommendations Memorandum

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| Date: | October 2024 |
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| Project: | C/CAG Vehicle Miles of Travel (VMT) and Greenhouse Gas (GHG) Model Mitigation Program |
| Subject: | Equity and Environmental Justice Recommendations Memorandum |



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Introduction

The City/County Association of Governments (C/CAG's) Vehicle Miles of Travel (VMT)/ Greenhouse Gas (GHG) Model Mitigation Program provides context, tools and an “exchange” approach for mitigating VMT and GHG generated by land use development and/or infrastructure projects for cities and other project developers and sponsors. An exchange will allow project developers or sponsors to fund offsite VMT mitigation actions to offset induced VMT resulting from their developments.

The Program is one of the first C/CAG efforts to apply an “equity lens” per the agency’s recently adopted Equity Framework and will serve as a learning opportunity on how to operationalize the Equity Framework at a project/program level.¹

The following memo provides recommendations to improve the Program’s equity and environmental justice outcomes, reduce social, economic, and environmental health inequities, and build greater relationships and trust between C/CAG and Equity Focus Area (EFA) community-based organizations (CBOs) and community leaders.² Key components of the memo include:

- An environmental/EJ contextual summary of San Mateo County.
- C/CAG’s and the project’s equity definition, commitment, and direction.
- Research and best practices on equitable VMT/GHG mitigation.
- A summary of CBO interview findings conducted for this project.
- Recommendations for equity and EJ strategies based on best practices and local context, including community/stakeholder preferences.

Project Overview

C/CAG has developed a VMT/GHG Model Mitigation Program to mitigate VMT and GHG generated by land use development and/or infrastructure projects. Mitigation is defined by the California Environmental Quality Act (CEQA) Guidelines as:

- Avoiding the impact,
- Minimizing the impact by limiting its degree or magnitude,

¹ [Equity Assessment, Framework, and Action Plan | C/CAG](#)

² Equity Focus Areas (EFAs) is a term used in this report to refer to geographies of priority based on high concentrations of community and demographic indicators of interest from an equity perspective. When stating “EFAs” or “EFA geographies and demographics” in this report, we are broadly referring to communities and populations with less historic and existing representation, fewer resources, unequal social, economic, environmental, and health impacts and outcomes, and generally greater needs and barriers. Various federal, state, regional, and countywide agencies have their own unique geographic area mapping approaches, indicators, and nomenclature, including California’s Office of Environmental Health Hazard Assessments (OEHHAs) CalEnviroScreen, the Metropolitan Transportation Commission’s (MTCs) Equity Priority Communities (EPCs), and C/CAG’s San Mateo County Countywide Bicycle and Pedestrian Plan (CBPP) EFA map.

- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environmental resource,
- Reducing or eliminating the impact over time, through actions that preserve or maintain the resource, and
- Compensating for the impact by replacing or providing substitute resources or environmental conditions, including through permanent protection of such resources in the form of conservation easements.³

The Program has developed a framework that C/CAG and other jurisdictions and agencies in San Mateo County can use to address these necessary mitigations while improving outcomes for Equity Focus Areas (EFAs).

The Program analyzes two potential mitigation program types, one implemented on a countywide basis and another at a local level:

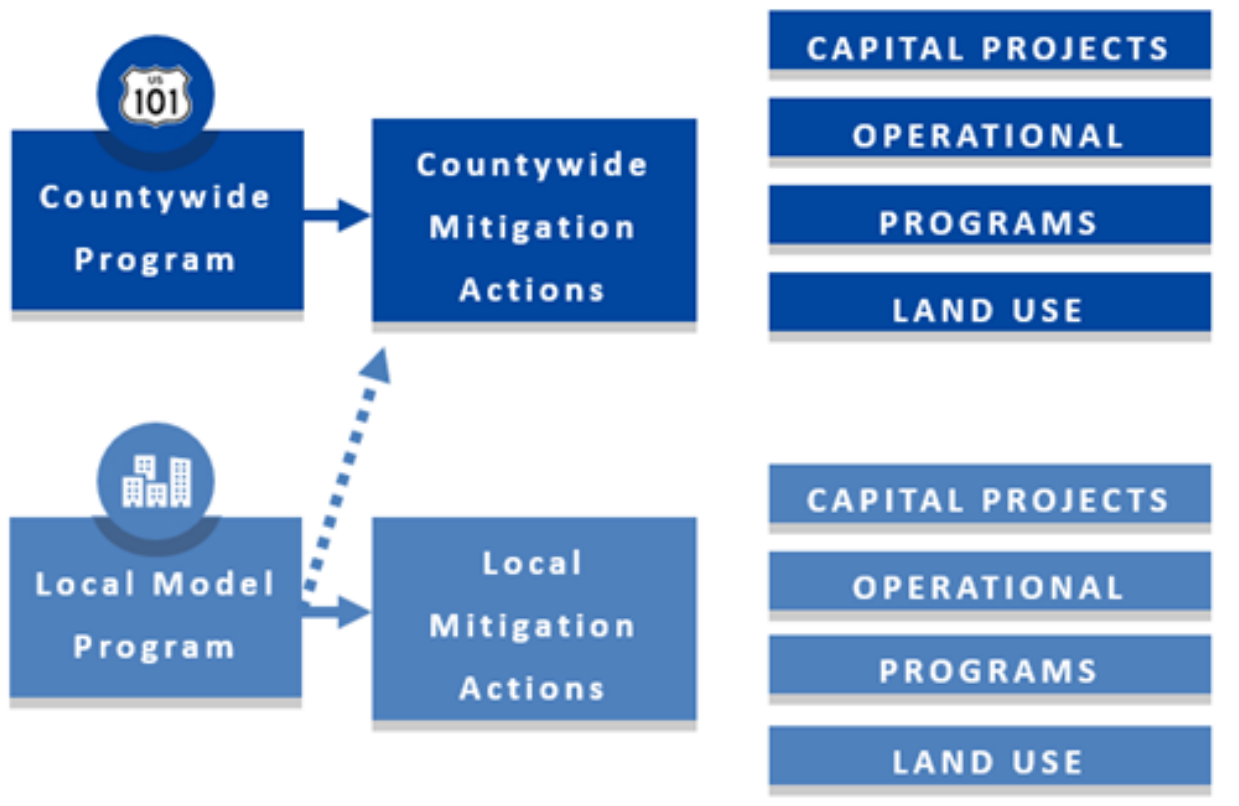
- **The countywide program** could be used by C/CAG and the San Mateo County Transportation Authority (SMCTA) to mitigate impacts from VMT/GHG-inducing countywide/regional transportation projects.
- **The local model program** serves as an optional tool for local municipalities to mitigate impacts from land use projects within their jurisdiction.

As presented in Figure 1, the models at both scales will contain a suite of mitigation actions, and there will be the option for local jurisdictions to direct local land use mitigation funding towards select countywide mitigation actions.⁴ The distinction between the countywide and local program presents equity-related questions, challenges, and opportunities that are discussed in the policy discussion section of this memo.

³ [AEP Mitigation Paper w/RMM edits \(11/3/19\) \(00519900\).DOCX \(ceqportal.org\)](#)

⁴ Local municipalities may prefer to participate in the countywide program for a variety of reasons, including funding larger cross-jurisdictional mitigation actions and/or minimizing administrative costs in setting up and running their own local program. However, no countywide agency has been identified to administer a countywide program at this time.

Figure 1: VMT/GHG Model Mitigation Program types



The Program is applicable to projects that generate VMT or GHG impacts and that require off-site mitigation.⁵ Projects are defined as follows in Pub. Res. Code § 21065:

A "project" is defined as a "whole action" subject to a public agency's discretionary funding or approval that has the potential to either (1) cause a direct physical change in the environment or (2) cause a reasonably foreseeable indirect physical change in the environment. "Projects" include discretionary activity by a public agency, a private activity that receives any public funding, or activities that involve the public agency's issuance of a discretionary approval and are not statutorily or categorically exempt from CEQA.

The Program does not apply to the following decision points, which local jurisdictions and agencies can address through other mechanisms as illustrated in the graphic below.

- Project on-site mitigation measures (required first before off-site measures)
- Projects that do not create impacts that require off-site mitigation
- Project design or location
- Policies or plans about future land use growth or transportation network changes

⁵ Caltrans guidance relating to mitigation: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/ser/mitigation-under-ceqa-a11y.pdf>

Figure 2: Project development life cycle & VMT/GHG Mitigation

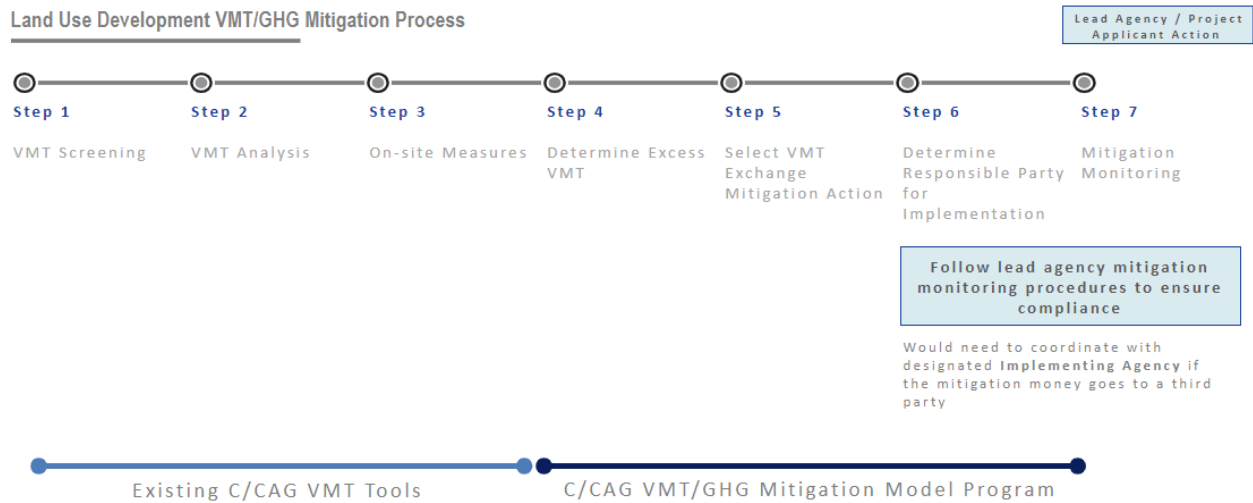


Figure 3 presents the draft mitigation action categories proposed by the project team based on selection criteria, including VMT reduction effectiveness, that could be used at the countywide scale, the local program scale, or at either program scale. The mitigation actions are described in more detail in the memorandum titled *C/CAG VMT/GHG Mitigation Program: Mitigation Measures and Program Alternatives (Draft)*.

Figure 3: VMT/GHG Model Mitigation Program mitigation actions by program type



Equity and Environmental Justice Context

In December 2023, the C/CAG Board of Directors adopted an agencywide Equity Framework that includes a historic summary of inequities in the county. This history of inequality includes:

- Genocide and land dispossession of Native Americans in the Bay Area,
- The practices of redlining and racial steering that concentrated people of color in communities like East Palo Alto and prevented racial integration across the county,
- Investments in transportation infrastructure (Highway 101) that reinforced segregation,

- Placing undesirable land uses in areas with high concentrations of people of color, and
- Economic development policies that encouraged job growth, coupled with inadequate housing production for all income levels and insufficient protections for renters, resulting in the ongoing affordability crisis and displacement of people of lower incomes.⁶

C/CAG recognizes that past actions, such as those described above, have led to unequal outcomes for people of color and other Equity Focus Area (EFA) demographics in San Mateo County, including:⁷

- Uneven distribution of income across racial/ethnic lines. Median household income for African American/Black, American Indian/Alaska Native, and Hispanic/Latino residents of San Mateo County are one third lower than their White and Asian neighbors.
- Significantly higher homeownership rates for White and Asian households (66% and 63% respectively). All other racial/ethnic demographics analyzed are under 50%.
- Uneven access to personal vehicles. One out of ten Black residents do not have access to a vehicle - twice the countywide average.
- Uneven ability to work from home, leading to implication for time spent in traffic, childcare costs, and exposure to extreme heat in outdoor working conditions. 12% of those with household incomes over \$75,000 work from home, almost twice the rate as those with household incomes under \$75,000. Similarly, 18% of non-Hispanic Whites work from home, compared to 8% of Latinos and 11% of Black households.
- An increase in homelessness, especially among people of color. Homelessness increased by 44% from 2017-2022, and people of color make up 84% of the population in census tracts identified as at risk of displacement by the California Estimated Displacement Risk Model. Only 7% of White households reside in gentrifying areas, compared to 33% of Latino and 38% of African American/Black households.
- Climate change impacts fall disproportionately on those with less wealth and fewer resources.⁸

Equity Definition, Commitment, and Approach

In its agencywide Equity Framework, C/CAG commits to addressing historic harms and existing inequities, such as those described above, by taking concrete steps through its planning efforts, projects, programming, and role as a countywide funder. C/CAG's equity definition includes:

⁶ [Equity Assessment, Framework, and Action Plan | C/CAG](#)

⁷ The SMC Comprehensive Bicycle and Pedestrian Plan defines EFAs as Census tracts with higher levels of low-income households, people of color, households without access to a vehicle, and households burdened by housing and transportation costs. Other demographics not captured in the CBPP, such as those with disabilities, youth, seniors, were also engaged in the VMT/GHG Mitigation Program process.

⁸ [Equity Assessment, Framework, and Action Plan | C/CAG](#)

- Acknowledging and addressing historic & existing disparities so that race, class, ethnicity, gender, age, disability, or other demographics do not determine economic, health, and quality of life outcomes.
- Removing systemic barriers and providing customized forms and levels of engagement and support for underserved and impacted communities.⁹

Related to the C/CAG VMT/GHG Model Mitigation Program, C/CAG acknowledges that people of color, people experiencing low incomes, and other EFA demographics and communities have historically generated lower VMT and greenhouse gas emissions per capita, had less access to a personal vehicle, and yet are the most vulnerable and least able to adapt to climate and environmental health impacts resulting from automobile-generated emissions.

C/CAG sees equity as a central objective in the mitigation of VMT and commits to an equitable process and outcomes during and after the Program development process for those policies and actions within its control. C/CAG also seeks to support and provide guidance to cities and other countywide agencies in achieving process and outcome equity.

C/CAG defines process and outcome equity for this Program as:

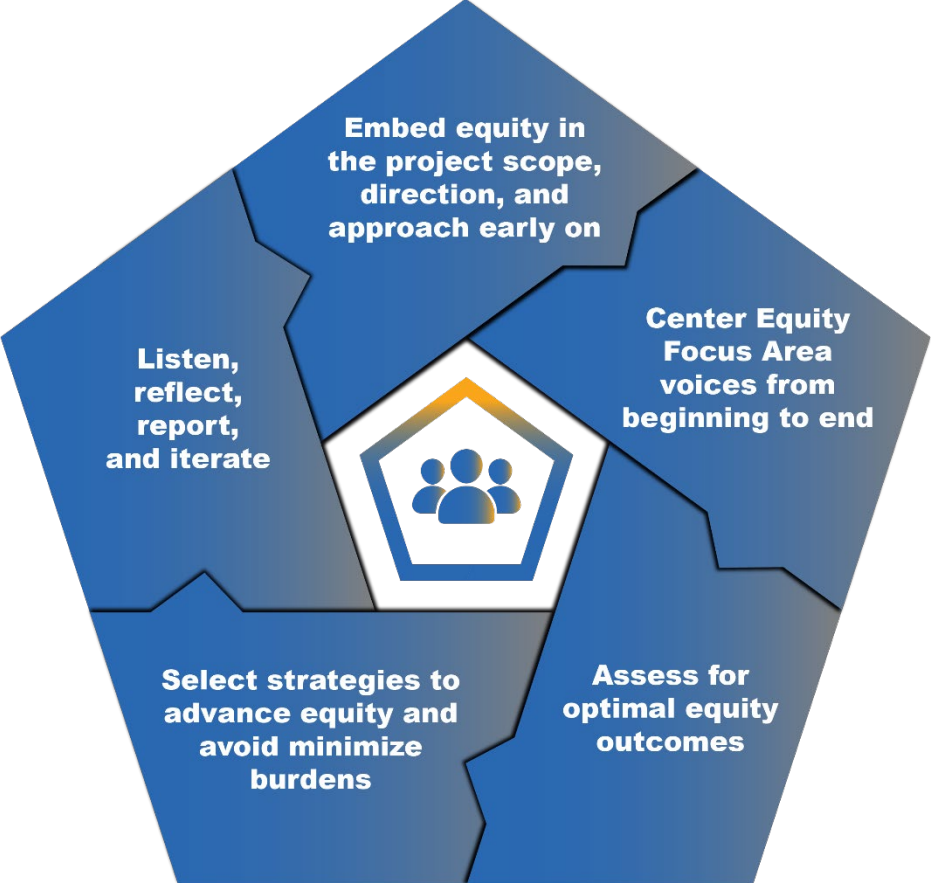
- **Process equity:** Engagement processes center Equity Focus Area (EFA) voices to foster greater understanding of issues, concerns, preferences, and needs of vulnerable and underserved communities.
- **Outcome equity:** Program policy and planning recommendations reduce existing disparities and mitigation actions focus benefits on EFA geographies and demographics.

The graphic below reflects C/CAG's equity approach, or procedural steps, for its programs, projects, and plans, as laid out in the Equity Framework. The illustration includes the following additional sub-steps, the spirit of which are infused throughout this memo's analytical lens and recommendations:

- **Scope:** Establish intended equity goals, outcomes, and performance measures.
- **Engagement:** Structure the planning and engagement process around achieving equitable outcomes.
- **Assessment:** Identify and integrate potential equity-focused concepts and alternatives early in the process for consideration and evaluation. Identify benefits & burdens of the activity and/or each alternative.
- **Final Decision:** Develop and finalize strategies based on the equity goals, outcomes, and performance measures, feedback obtained from equity voices, and analysis of benefits and burdens.
- **Evaluation and Iteration:** Report results, lessons learned, and proposed changes to the design of the project, plan, or other activities moving forward to stakeholders involved in the process and to decision makers and advisory bodies through the new Equity Section in staff reports.

⁹ [CCAG-Equity-Framework_Final-Report_12.18.23.pdf](#)

Figure 4: C/CAG Equity Framework approach to projects and programs



Research and Best Practices on Equitable VMT/GHG Mitigation

Three Bay Area resources with meaningful discussion on the specific intersection between equity and VMT/GHG mitigation include:

- Institute of Transportation Studies, Berkeley, Elkind, E., Lamm, T., & Prather, E. (2018). *Implementing SB 743: An analysis of vehicle miles traveled banking and exchange frameworks*. Retrieved January 2, 2023, from <https://its.berkeley.edu/node/13317>
- Alexander, S. E., Alfonzo, M., & Lee, K. (2021). Safeguarding Equity in Off-Site Vehicle Miles Traveled (VMT). In *Mineta Transportation Institute*. <https://transweb.sjsu.edu/research/2027-Equity-Off-Site-VMT-Mitigation>
- Mineta Transportation Institute, Alexander, S. E., Chen, L., & Belote-Broussard, M. (2024). Exploring Equity Frameworks for a Cross-Jurisdictional Vehicle Miles Traveled Mitigation Program in Santa Clara County. Retrieved June 7, 2024, from <https://transweb.sjsu.edu/research/2346-Vehicle-Miles-Traveled-Transportation-Emissions-Equity>

“Implementing SB 743” by UC Berkeley’s Institute of Transportation Studies notes that a VMT mitigation bank or exchange’s potential to transfer impacts (negative or positive) from one location to another location could reduce or deepen existing racial and socio-economic disparities. The authors note that even if such a VMT program would reduce disparities by transferring mitigations from non-EFAs to EFAs, there is still the potential for local concerns.

The authors recommend that mitigation bank or exchange designers ensure that individual communities that host new developments—and Equity Focus Areas in particular—do not suffer disproportionate impacts. They offer the following considerations and potential solutions.

Table 1: Mineta Transportation Institute (MTI) equitable VMT mitigation recommendations

| Assurance | Solutions |
|---|--|
| Minimum % of total mitigation funding reaches EFA’s | Offer prioritization of or VMT discounts for mitigation projects located in Equity Focus Areas (EFA’s) |
| | Require minimum % of total funding to be delivered to EFA’s |
| | Direct mitigation projects from affluent communities to EFA’s |
| Preserve localized equity | Employ a more stringent feasibility standard for development projects located in EFA’s |
| | Limit size of area/region covered by bank or exchange |

“Safeguarding Equity in Off-Site Vehicle Miles Traveled (VMT)” by the Mineta Transportation Institute seeks to assess the equity challenges of off-site VMT mitigation efforts and how Equity Focus Areas might be adversely impacted and inform policy and practices related to off-site VMT mitigation and/or replacing level-of-service (LOS) with VMT in CEQA processes.

It's important to note that the framing of the study is oriented around harm avoidance or reduction rather than reducing historic/existing disparities. Harm avoidance or reduction is an important "floor" in equity advancement work but should not be considered a "ceiling."

The report cites multiple examples of lessons learned from policy arenas that may be transferable to the off-site VMT mitigation concept:

- Wetland Mitigation: A study of Washington wetland mitigation efforts found ecosystem benefits shifting from urban to rural areas. The report recommends developing and maintaining a spatial database & assessing impacts over time.
- Ecological Restoration: There is an overreliance on basic cost-benefit analysis tools in ecological restoration that often fails to capture the distribution of mitigation effects. The report recommends deeper stakeholder analysis and an active incorporation of local concerns.
- Cap and Trade: California's cap and trade program emphasizes reduced overall emissions, but the concern is that GHG and other pollutant emissions can still increase within environmental justice communities even as overall emissions dip. The report takes note of California's approach to dealing with this concern as was also highlighted in the ITS publication above.

Considering the examples above and other evidence, the MTI authors raise the following issues:

- Off-site VMT mitigation could overburden EFA's through limited benefits and increased VMT in areas surrounding sites, even as overall emissions decline.
- There is a tension between regional and local equity challenges, needs, and investment focus. This tension includes the question of whether to use local mitigation funds generated in an EFA that would result in:
 - better VMT/GHG and equity outcomes if spent in a different EFA elsewhere in the county, or
 - a countywide equity investment that disperses benefits to EFA demographics beyond the impacted community.
- The biggest opportunities for VMT mitigation are related to location of the development site, not what can be done after the fact.

Related to the final point above, C/CAG's Program is not focused, nor can it directly affect where projects outside of its direct control are proposed, nor the type of mitigations adopted on-site.¹⁰

Recommended interventions by the MTI report include:

- In-depth analysis of the distribution of benefits and costs:
 - Identification of EFAs and analysis of how these communities are impacted or benefited.
- Meaningful engagement:

¹⁰ That said, C/CAG can provide indirect support and guidance to project sponsors, such as identification of mitigation action priorities in EFAs in advance of mitigation funding.

- Identification of mobility need & historic disinvestments in EFAs.
- Engage EFAs in goal setting and alternative development.
- Place investment decision-making power in the hands of communities, in particular EFAs.
- Equitable interventions and outcomes:
 - Adopt equity policies, such as those from California’s Cap and Trade Program, that increase benefits to EFAs and low-income households.
 - Consider funneling development into areas where people will be less likely to drive greater miles - in other words within more urban, walkable, transit-accessible communities.

“Exploring Equity Frameworks for a Cross-Jurisdictional Vehicle Miles Traveled Mitigation Program in Santa Clara County” was produced by a Mineta Transportation Institute (MTI) research team and San José State University (SJSU) students, in partnership with the Santa Clara Valley Transportation Authority (VTA). The report’s intent was to help develop VTA’s equity framework for the agency’s proposed VMT mitigation program.

The report’s literature review includes the following take-aways that are closely related to the report’s recommendations:

- Robust stakeholder engagement and meaningful community involvement are key to an equitable engagement process reflecting community needs and priorities.
- Acknowledge inequity and work to develop a localized definition of VMT equity that reflects community needs and priorities.
- Develop an informative and implementable accountability plan.
- Embed equity into the project prioritization criteria and evaluation metrics.

Equitable VMT/GHG Mitigation Policy Discussion

To address existing inequities stemming in part from historic actions, lead agencies should seek to achieve disproportionate benefits for EFA geographies and demographics, not just avoid disproportionate burdens. Based on C/CAG’s Equity Framework approach/lens and the findings and recommendations from the two reports listed above, the following equity-related questions were identified. This memo seeks to explore these questions and provide applicable recommendations to address them.

- **EFA engagement and equitable decision making:**
 - What is the process, on the part of project sponsors, for deciding how mitigation dollars for specific projects will be spent and what projects are funded?
 - What level of representation of and accountability to EFA stakeholders will decision-making bodies have?
 - How will EFA and equity leaders in the county be consulted on an ongoing program-level and project-specific basis?
 - How will mitigation actions be tailored, influenced, and/or determined locally by impacted/vulnerable populations?

- **Equitable investment of mitigation funds:**
 - How can the Program deliver disproportionately positive benefits for EFA geographies and demographics?
 - How can benefits and impacts be evaluated and communicated?
 - How will funded mitigation actions be designed with universal access in mind to tailor actions around the needs and preferences of EFA demographics?
 - What balance or preference is there, if any, for local- or neighborhood-scale projects vs regional/countywide projects? How can the tension between local vs countywide investments, or the transfer of benefits from one geography to another, be addressed?
 - How quickly will EFAs see tangible benefits from mitigations?
- **Monitoring, evaluation, reporting, learning, and continuous improvement:**
 - How will mitigation actions be monitored and evaluated over time? How will data and adjustments to mitigation actions be reported to impacted populations?
 - What indicators/performance measures will be used to track progress?
 - What equity focused committees exist in the county that would be a venue for ongoing communication and dialogue with EFA leaders? What are the alternatives if such committees do not exist?

Finally, as already noted, the distinction between the countywide and local model program creates complexities in the response to the questions above and is discussed in some detail below. However, it will be important for C/CAG and its agency and city partners to tease out and gain further clarity around the equity approach for the countywide vs local program moving forward.

Decision Making & Equity Focus Area (EFA) Engagement

Who makes decisions and how EFAs are consulted in decision making are key questions that will affect the extent to which equity is addressed in the Program. Lead agencies in San Mateo County will be responsible for deciding how mitigation dollars are spent as a part of the environmental studies for projects that create significant VMT/GHG impacts. For the Countywide Program, the lead agencies would likely be SMCTA and/or C/CAG. For the Local Model Program, the lead agency would be cities or the County of San Mateo.

C/CAG's Program provides technical resources for what mitigation actions are cost effective and potential target recipient geographies and populations. Lead agencies would be ultimately responsible for adopting these recommendations.

A key distinction between the Countywide Program and Local Model Program is that C/CAG and the SMCTA can directly incorporate and implement the recommendations in this memo but can only suggest and/or support recommendations, such as through the provision of capacity building opportunities (such as resources, tools, and workshops) for Local Model Program projects and associated mitigation actions.

To achieve process and outcome equity, it is essential for program mitigation actions to be tailored and/or prioritized based on EFA issues, needs, and preferences. Actions can be infused with the Program's community engagement findings, prior equity program findings and recommendations (e.g., Community Based Transportation Plans, General Plan Environmental Justice Elements, and the San Mateo 101 Express Lanes Equity Study), and ongoing consultation with EFA leaders and residents.¹¹

County and local-level advisory bodies can be another important component of equitable decision-making and a natural place for ongoing communication and dialogue with EFA leaders. Equity-focused commissions or committees composed of EFA leaders can assist with mitigation action review and ongoing Program oversight and accountability to EFAs. One challenge is that most existing C/CAG and countywide commissions and committees lack an equity focus and are not reflective of the demographic makeup of the county, much less of EFAs. At the local level, the demographic makeup and degree of equity focus of such advisory bodies varies widely from jurisdiction to jurisdiction. New commissions or committees could be established at the county-level to bridge these gaps, but it is not clear this would happen due in part to resource constraints.

Mitigation Action Investment

Achieving equitable outcomes requires that the crafting and prioritization of VMT/GHG mitigation action investments be based, at least in part, on their benefit to EFA geographies and demographics and local community support. Countywide mitigation actions will typically be managed by countywide agencies, while the Local Model Program will prioritize local measures that local lead agencies can control. The Program can provide recommendations for lead agencies to:

- Prioritize desired mitigation actions to serve EFA geographies, particularly those close to the VMT/GHG impact.¹²
- Tailor and prioritize mitigation actions based on universal access for EFA demographics.

An important consideration is that mitigations with countywide significance are likely to be more effective at reducing VMT/GHG than local actions. This may result in cases where local jurisdictions, despite their likely preference to place mitigation funds into a local program, may need to place at least some of the mitigation funds into the countywide program to sufficiently mitigate the VMT/GHG impacts of the proposed project.

Another important consideration is that the countywide program is more likely to present the most direct and rapid avenue with the least cost and administrative burden for cities. Establishing a Local program for each city is likely to take more time, resources, and

¹¹ [Community Based Transportation Plans | C/CAG; Equity Study | San Mateo Express Lanes \(101expresslanes.org\)](https://www.101expresslanes.org)

¹² This may include actions that connect EFAs to jobs, schools, health care, and other opportunities outside of an EFA.

administrative burden for each local jurisdiction. The faster a program exists for cities to participate in a VMT mitigation program, the sooner cities will be able to reap some level of community, equity, and VMT/GHG reduction benefits from VMT-inducing projects. Currently, local and countywide agencies in San Mateo County are declaring a “Statement of Overriding Considerations” for VMT-generating projects because there is no existing VMT mitigation program for them to participate in. This means they are foregoing the opportunity to generate revenues from development for VMT/GHG reduction strategies.

Temporally speaking, all projects that generate impacts will need to receive environmental approvals, financing, and likely complete construction prior to communities receiving benefits from mitigations. CEQA requires that mitigations take place when the impact occurs, so construction completion is the most likely timeline for implementation of the mitigation actions. After completion of the Program, benefits from mitigation actions are likely to start 2-5 years out given typical project timelines. The close temporal nexus between impact and mitigation means that communities are likely to see Program benefits in tandem or soon after a project is constructed. This also suggests that planning, design, and vetting of mitigation actions should be completed well before funds become available, so the action is well-positioned to be funded.

Geographic Distribution of Mitigation Actions

VMT/GHG mitigation programs may result in positive, negative, or neutral equity impacts from a geographic standpoint depending on whether a mitigation is implemented within or outside of the community where the VMT/GHG impact is to take place.

As noted by the authors of “Implementing SB 743”, local community preferences near the site of VMT impact and equity outcomes may not necessarily be aligned. The table below provides several hypothetical examples of the interplay between EFA geographic benefit and level of community support or concern. These examples assume there is clear understanding and sufficient data about how mitigation benefits will be apportioned between EFAs and non EFAs.

Table 2: Hypothetical equity benefits and community support/concern of locational investment decisions

| Example | Geographic Equity | Potential Community Concern or Support |
|---|-------------------|--|
| Impact occurs in an Equity Focus Area (EFA) or non-EFA and is mitigated in the same geography | Neutral | No/low concern |
| Impact occurs in an EFA and is mitigated in a different EFA | Neutral | Likely support among EFA(s) receiving mitigation action, & potential opposition among EFA where project impact takes place |

| | | |
|--|-------------------------|---|
| Impact occurs in a non-EFA and is mitigated in a different non-EFA | Neutral | Likely support among non-EFA(s) receiving mitigation action, & potential opposition among non-EFA where impact takes place |
| Impact occurs in an EFA and is mitigated in a non-EFA | Negative (avoid) | Potential support in non-EFA receiving the mitigation action, & likely concern from EFA where impact takes place (except for affordable housing, which can benefit EFA's when located in non-EFA's per local housing element's) |
| Impact occurs in a non-EFA and is mitigated in an EFA | Positive | Likely support among EFA(s) receiving mitigation action, & potential opposition among non-EFA where impact takes place |

The only option in the table above that would improve geographic equity is the final row because it would transfer benefits/mitigations from non-EFAs to EFAs; however, such an approach would hypothetically raise concerns from non-EFAs where the project impact takes place. From an equity perspective, the example in the second to the last row should be avoided as it would transfer benefits from EFAs to non-EFAs and may generate local opposition to the transfer of such benefits and impacts from one community to another.

Potential variants of the examples above that may generate equity-benefits with less potential concern and opposition from communities surrounding the project where impacts are generated may include:

- Invest in programs that are targeted to EFA demographics throughout a jurisdiction or at the countywide level, such as free or subsidized transit pass programs.
- Commit to transferring mitigations from non-EFAs to the nearest possible EFAs, including within the same jurisdiction.
- Invest in concentrated pockets of low income and other EFA demographics that do not show up on the primary equity screening tools, including C/CAG's EFA map, due to the population being relatively small in comparison to the larger population within the geographic area of analysis (i.e. census tract). An example of this would be a mobile home park or farmworker housing located in an otherwise high-income area.
- Invest in project mitigation funds in both the impacted community (local program) and larger scale mitigation actions that carry greater VMT/GHG and equity benefits (countywide program).
 - This may include an investment goal of a minimum percentage allocation towards EFAs and/or the countywide program.
- Emphasize projects or programs that span both the community where the project impact is to take place and a nearby EFA that would receive some of the mitigation benefit. Examples of this might be:
 - An improved transit line or micromobility services offered between an impacted non-EFA and a nearby EFA, or
 - A TDM program that links low wage workers from EFA geographies to high opportunity/employment areas.

- Fund affordable homes for families experiencing lower incomes in areas designated by CTCAC/HCD as [Neighborhood Opportunity areas](#), especially if such areas are located within a half mile of frequent bus or rail service.
 - A question that may emerge is whether residents of the EFA where the impact takes place will benefit from new affordable units. Local preference is a policy that local governments have used to ensure new affordable units are made available to nearby residents.

From a mitigation action prioritization standpoint, at either the countywide or city level, projects may be screened (pass/no pass) if they directly serve or benefit EFA geographies. Alternatively, mitigation actions may be given a certain number of points for the degree of EFA benefit as part of a larger point system that includes VMT/GHG reduction potential and other indicators. Agencies will need to consider resources, available data, and local needs and preferences to determine what kind of screening/selection approach and criteria to use.

The following tables provide additional examples beyond the decision-tree approach noted on page 14 of how mitigation actions might be screened or prioritized based on geographic benefit to EFAs considering different variables of potential equity benefit, including:

- Access to employment and other opportunities for people residing in EFAs
- Increased comfort and useability of transportation options in EFAs
- Improved health and safety in EFAs
- Reduced cost of living in EFAs

Table 3: Example of screening and prioritization approach of mitigation actions based on improved outcomes for EFA geographies.

| | Major improvement (+2 points) | Minor improvement (+1 point) | No change (0 points) | Minor degradation (-1 point) | Major degradation (-2 points) |
|------------------------------------|-------------------------------|------------------------------|----------------------|------------------------------|-------------------------------|
| Mobility and access to opportunity | | | | | |
| Comfort and useability | | | | | |
| Health and safety | | | | | |
| Affordability | | | | | |

Table 4: Example of screening and prioritization approach of mitigation actions based on reduction of disparities geographically as measured by benefit to EFAs relative to non-EFAs.

| | Major relative benefit to EFA demographics (+2 points) | Minor relative benefit (+1 point) | No change (0 points) | Minor relative benefit to non-EFA demographics (-1 point) | Major relative benefit to non-EFA demographics (-2 points) |
|--|--|-----------------------------------|----------------------|---|--|
| | | | | | |

| | | | | | |
|------------------------------------|--|--|--|--|--|
| Mobility and access to opportunity | | | | | |
| Comfort and useability | | | | | |
| Health and safety | | | | | |
| Affordability | | | | | |

The distinction between the two tables above is that a mitigation action may provide benefits to EFA geographies but do so equally to that of non-EFAs. Such actions would not necessarily address underlying disparities. On the other hand, just because an action results in greater relative benefit to EFAs compared to non-EFAs, doesn't mean it will result in the most actual benefit to EFAs compared to other actions. Either of these approaches may be used in assessing equity benefit depending on the planning and/or local context.

Demographic Benefit of Mitigation Actions

When it comes to achieving equity outcomes through mitigation actions, place is important to consider, but it is also important to tailor actions around the needs and preferences of vulnerable, underserved, and impacted demographics. A universal design approach that centers people with disabilities, people with limited English comprehension, people living under the poverty line, and people with other needs and preferences that differ from the general population can optimize the equity benefits of any project, regardless of location. Such an approach, and corresponding design standards or policies, may be required for any project and/or can be used as part of a point system in prioritizing mitigation actions.

The following design principles can help design, screen, and prioritize mitigation actions around specific EFA demographics. Other universal design considerations include awareness and understanding, social integration, personalization, cultural inclusivity, and accommodation of a wide range of body sizes and abilities.¹³

Table 5: Degree to which the mitigation action improves outcomes for EFA demographics.

| | Major improvement (+2 points) | Minor improvement (+1 point) | No change (0 points) | Minor degradation (-1 point) | Major degradation (-2 points) |
|------------------------------------|-------------------------------|------------------------------|----------------------|------------------------------|-------------------------------|
| Mobility and access to opportunity | | | | | |
| Comfort and useability | | | | | |
| Health and safety | | | | | |
| Affordability | | | | | |

¹³ [Beyond Accessibility to Universal Design | WBDG - Whole Building Design Guide](#)

Table 6: Degree to which the mitigation action makes disparities better or worse for EFA demographics.

| | Major relative benefit to EFAs (+2 points) | Minor relative benefit (+1 point) | No change (0 points) | Minor relative benefit to non-EFAs (-1 point) | Major relative benefit to non-EFAs (-2 points) |
|------------------------------------|--|-----------------------------------|----------------------|---|--|
| Mobility and access to opportunity | | | | | |
| Comfort and useability | | | | | |
| Health and safety | | | | | |
| Affordability | | | | | |

By asking how projects benefit EFA demographics, C/CAG and other countywide agencies and cities can improve the equity-outcomes of their own proposed mitigation actions. Ultimately, the combination of geographic and demographic focus and benefit can be coupled with the level of community support to determine the degree of overall equity benefit as the example below illustrates.

Table 7: Hypothetical example of equity ranking approach of mitigation actions, considering geographic and demographic equity benefit and community support

| Mitigation action | Locational equity benefit | Demographic equity benefit | Level of community support |
|---|--|--|----------------------------|
| Housing action (ex. affordable housing in high opportunity transit-oriented areas) | High opportunity transit rich areas (likely not located in EFAs) | High | High |
| Capital project 1 (ex. BRT on El Camino Real) | Countywide along ECR (located in both EFAs and non-EFAs) | High | High |
| Capital project 2 (ex. Pedestrian safety improvements in EFA traffic injury/fatality hot spots) | EFA geographies | High | High |
| Capital project 3 (ex. Active transportation project that is 50% within EFAs and 50% in non-EFAs) | Location in both EFA and non-EFA | TBD depending on degree to which EFA community input shapes the location and design of the project | TBD |
| Program 1 (ex. Funding for affordable transit pass) | Countywide, potentially with a focus on EFA | High | Medium-High |

| | | | |
|---------------------------------------|--|---|-----|
| program) | geographies in implementation | | |
| Program 2 (ex. Equitable TDM program) | TBD, possibly a focus in EFA business districts or EFA residential areas | Medium to High (if targeted towards low wage service workers) | TBD |

For agencies with resource constraints, an alternative prioritization approach for mitigation actions that may be less labor and data intensive than the examples presented above may be the development of a decision tree that poses questions for staff to respond to. Examples of questions may include:

- Does the action have direct or indirect negative, positive, or neutral impacts on EFA geographies? Please describe: _____
- Does the action have direct or indirect negative, positive, or neutral impacts on EFA demographics? Please describe: _____
- What is the estimated proportion of benefit to EFA and non EFA geographies?
- What is the estimated proportion of benefit to EFA and non EFA demographics?
- Is the specific action supported by EFAs in the proposed geography? Please describe: _____

Monitoring, Evaluation, Reporting, Learning, and Continuous Improvement

Lead agencies are responsible for environmental review (CEQA study) and for monitoring the implementation of mitigation actions and how successful the VMT/GHG reduction is for CEQA purposes as a part of a Mitigation Monitoring and Reporting Program (MMRP). Equity metrics could be included as part of the MMRP but are not a legal requirement. The Program could also recommend a mechanism for using the MMRP process to report back through responsible commissions or committees, but as noted previously in this memo, it is not clear that such equity focused committees exist at the countywide level or within most local jurisdictions.

Community Engagement Process and Findings

Background

Stakeholder and community input on potential strategies from mitigation dollars is crucial to the success of an equitable VMT/GHG Model Mitigation Program as these strategies will affect equity and opportunity in communities for years to come. The outreach for the development of C/CAG's Program includes meetings with the VMT/GHG Model Mitigation Program Technical Advisory Task Force (TATF), the C/CAG Congestion Management Program Technical Advisory Committee (TAC), the Congestion Management and Environmental Quality Committee (CMEQ), the C/CAG Board of Directors, and interviews with community leaders and CBO representatives.

As part of the Program's development, the consultant firm, InterEthnica, was tasked with interviewing community leaders and CBO representatives to ensure program goals and interventions align with EFA community leader preferences.

Public engagement goals included:

- Informing community members about the Program, its process, its potential impacts, and opportunities for involvement;
- Gathering input on community concerns, barriers, and opportunities around development and reducing driving in San Mateo County;
- Aligning the Program with community concerns and preferred approaches; and
- Ensuring community feedback is incorporated from across San Mateo County with a particular focus on Equity Focus Areas geographies and demographics.

InterEthnica interviewed a wide cross-section of community leaders who represent and/or have extensive reach in and familiarity with EFA geographies and demographics. Selection of priority community audiences was vetted with C/CAG staff. These included CBOs representing:

- People experiencing poverty and/or a high housing and transportation cost burden
- Households without access to a vehicle
- People with limited English proficiency
- People with disabilities
- Families with children
- Non-white populations
- Seniors and youth/schools

20 interviews were conducted, which provided an opportunity to cover the VMT/GHG Mitigation Program topic in depth and gather detailed information around community concerns, barriers, and benefits.

Table 8: CBO interviews conducted by InterEthnica

| Geography | Organization |
|-------------------------------|--|
| Coast | <ul style="list-style-type: none">• Ayudando Latinos a Sonyar (ALAS)• Boys and Girls Club of the Coastside• Viviendas Justas (ALAS)• Farmworker Advisory Commission• Pacifica Resource Center• Senior Coastsideers |
| North County | <ul style="list-style-type: none">• Rise South City• Peninsula Family Resource• Pilipino Bayanihan Resource Center (PBRC) |
| Central / South County | <ul style="list-style-type: none">• Casa Circulo Cultural• CORA – Community Overcoming Relationship Abuse• Saint James AME Zion church• Renaissance Entrepreneurship Center• Youth United for Community Action (YUCA)• The Primary School• El Concilio of San Mateo County• East Palo Alto Community Alliance and Neighborhood Development Organization (EPA CanDo) |
| Countywide | <ul style="list-style-type: none">• Center for Independence of Individuals with Disabilities• Silicon Valley Bicycle Coalition• Samaritan House |

The focus of these conversations was oriented around the following questions:

- What are the top concerns your community has related to development and reducing driving?
- Which mitigation action concepts/strategies would be most beneficial to your community? How can they be best tailored to maximize benefits for your community?
- Which of these strategies do you have concerns about and their impacts on your community? What, if anything, would help alleviate your concerns?
- What currently prevents community members from biking, taking public transit, etc.? How could we address this?
- Is there anything else to keep in mind when thinking about equitable outcomes for your community?

Interview participants were provided with 8 strategies that are most effective at reducing vehicles miles traveled within, into, and out of the county and were asked to reflect on their value or lack-thereof for their respective communities:

- Transit enhancements
- Affordable housing
- Subsidy programs (e.g. Transit Discount program, e-bike rebate)

- First/last-mile services (e.g. bikeshare, carshare, mobility hubs)
- Community travel planning
- Biking and walking paths
- Parking program/curb management
- Electric vehicle (EV) charging facilities

It's important to note that due to the need to focus the time spent with interviewees on the questions above, there were certain policy and planning questions that were not part of these conversations that are key to aligning the program around equitable process and outcomes. These questions may be posed as the Program moves into further planning work and/or implementation:

- How might EFA-serving CBOs and EFA leaders be centered in implementation of mitigation actions?
 - How should decisions be made on how mitigation dollars for specific projects are spent and what actions are funded?
 - How should mitigation actions be tailored, influenced, and/or determined locally, including by impacted/vulnerable populations?
- How might mitigation funds be spent to reduce existing disparities?
 - What preference is there, if any, for local/neighborhood scale mitigation actions vs regional/countywide actions?
- What kind of monitoring, evaluation, reporting, learning, and continuous improvement should take place over time?
 - How can decision-making bodies maintain accountability to EFA stakeholders?
 - What kind of indicators/performance measures should be used to track progress?
 - Who should evaluate & monitor mitigation actions over time?
 - How would EFA and CBO leaders prefer that information, including outcomes and adjustments to investments, be reported back to them and EFAs over time?

Community Based Organization (CBO) Interview Findings

The following summary is taken from InterEthnica's "Program Outreach and Engagement Topline Report" and amended for brevity. Further details can be viewed in the report.

InterEthnica reported that participants of the twenty interviews generally responded positively towards mitigation action categories (strategies) and expressed that most could benefit their communities if implemented effectively and around their community needs.

As the table below indicates, interviewees gravitated towards affordable housing (15 votes), biking/walking paths (13), transit enhancements (11), first/last mile services (11), and community travel planning (10), followed by subsidy programs (9) and EV charging facilities (6), and parking program/curb management (2). Those strategies below that are not bolded are additional ideas suggested by interview participants.

Table 9: CBO interview prioritization of mitigation action categories (strategies)

| Strategies (original in bold font – added in normal font) | Most beneficial | Somewhat beneficial | Not at all beneficial |
|---|-----------------|---------------------|-----------------------|
| Affordable housing | 15 | 2 | 0 |
| Biking/walking paths | 13 | 3 | 1 |
| Transit enhancements | 11 | 4 | 0 |
| First/last mile services | 11 | 4 | 1 |
| Community travel planning | 10 | 5 | 0 |
| Subsidy programs | 9 | 6 | 0 |
| EV charging facilities | 6 | 5 | 3 |
| Parking program/curb management | 2 | 3 | 7 |
| Public information about how to ride transit | 1 | 0 | 0 |
| Partnerships with schools | 1 | 0 | 0 |
| Invite private industries and nonprofits to give incentives | 1 | 0 | 0 |
| Universal basic income | 1 | 0 | 0 |
| Transit programs that support small businesses | 0 | 1 | 0 |
| Biking paths only | 0 | 1 | 1 |
| Carpool lanes | 0 | 1 | 0 |
| Affordable EV car program | 0 | 1 | 0 |

Affordable housing was considered the most beneficial strategy across geographies and demographics/interests. Participants expressed a need for affordable housing that is close to resources such as public transit, grocery stores, schools, medical centers, and downtown commercial areas. They stressed the importance of clear, inclusive eligibility criteria that would include both low to middle-income groups.

Biking and walking paths were considered the second most beneficial strategy; however, there was a split between participants who expressed a strong desire for more walking paths versus biking paths. Particularly in East Palo Alto and North Central County, participants lamented the lack of sidewalks and expressed that there were plenty of bike lanes already. The Silicon Valley Bicycle Coalition provided examples of how biking paths could be safer through protected lanes and traffic calming. Additional concerns were raised around ensuring that the construction of new bike lanes in commercial areas do not obstruct wheelchair-accessible parking and that walking paths are made wide enough to ensure wheelchair access even with lampposts and outdoor restaurant seating posing as obstacles. Coastsiders did not view biking and walking paths as viable means of commuting, but they expressed the importance of adequate lighting and clear bike lanes for leisure and exercise.

Transit enhancements and first/last mile services were also considered highly beneficial. The most common pain point expressed around public transit was that it currently takes too long and is not a viable option for getting to work, taking children to school, and squeezing in

errands. Participants suggest increasing public transit frequency, reliability, and efficiency and investing in additional express buses, trains, and shuttles. Additionally, participants stated that public transit stops drop off community members, particularly older adults, too far from their destination. Participants envisioned a system that would take them from their doorsteps to a transit hub.

Last mile services highlighted by meeting participants included on-demand taxi and shuttle services and micromobility services:

- Participants found on-demand taxi and shuttle services that pick up and drop off door to door or in a local automated loop to be appealing to close the first and last mile gap.
- Some participants suggested establishing a strong micromobility network while ensuring e-bikes and e-scooters are maintained and not left littered on the streets.
- Participants also suggested improving the convenience and utility of Redi-Wheels and other services for people with disabilities by decreasing the amount of lead time from days to a few hours in which a ride must be requested.
- Because of the distance and mountains, first/last mile services were not considered to be relevant to the coastside. However, microtransit services, including shuttle services were highly valued, in particular to help older adults get over the Santa Cruz mountains and to their medical appointments. Coastsiders expressed that existing shuttle services are too infrequent and have too many stops which slows down service. Ride-hailing services were also viewed as unaffordable and hard to come by on the coast.

Community travel planning and subsidy programs were both ranked as most and somewhat beneficial, with the greatest benefit resulting from a combination of the two. Many organizations expressed that they already informally offer community travel planning services and that it would be optimal to combine community travel planning with subsidy programs to ensure that community members could afford the transit options they are proposing. Participants indicated the necessity of education and guidance around new strategies so that community members are aware of and have the resources to access them. Additionally, because of the lack of trust in these communities with government agencies, community organizations are best positioned to provide resources and support for their community members.

Mobility wallets, transit discounts, and e-bike rebates were offered as examples of potential strategies under the subsidy program. Participants were most excited about mobility wallets and regional transit passes to help community members more easily navigate public transit. However, participants expressed concerns about cumbersome enrollment and eligibility processes. To ease this process, participants suggested an automatic enrollment process with EBT or similar income-eligible programs. Additional concerns were raised around the complexity of mobility wallets, particularly for older adults who may have more challenges using technology. Participants suggested keeping the mobility wallets very simple and providing technology training and support, which could be done through community organizations.

Participants expressed the importance of having subsidy programs that last for a substantial period so that they can have a real impact. Rather than an e-bike rebate program, participants

suggested an upfront discount program, as previous experience showed that community members were skeptical of rebate programs, particularly those who are undocumented and who do not file taxes.

EV charging facilities and parking program/curb management strategies were the two strategies that participants indicated as being the least beneficial. Participants could see the value of having more EV charging facilities in general, but they indicated that it would not be very relevant in their communities due to the high cost of purchasing electric vehicles. An additional concern that was raised is that charging facilities may lead to gentrification. Concerns were also raised about EV charging facilities taking away parking spots from people with disabilities. For the strategy to be effective, electric vehicles would first and foremost need to be made more affordable or accessible, such as through an EV carshare program.

Although not a top choice, participants could see the benefits of parking programs if they were limited to commercial areas and measures were taken to alleviate the impact on local community members. Participants suggested a subsidy or permit program, such as through a parking benefit district, for residents to ensure that additional financial burdens are not placed on them. A parking program and curb management would not work for the coastal communities as they are reliant on cars, and paid parking would cause an outrage.

In summary, participants could see benefits in all strategies despite the unique challenges and concerns that remain to be addressed for each community around accessibility, affordability, eligibility, and ease of use. The eight strategies were viewed as particularly beneficial when combined, and participants stressed the importance of education and outreach to ensure that the strategies were utilized to their potential.

Finally, several interview participants appreciated that they were consulted regarding the Program development but requested that conversations also be held with their communities. The interviews conducted by InterEthnica provide reactions to general mitigation action investments from a diversity of CBOs across the county, but it's important not to overstate these findings. Further engagement is necessary, especially as mitigation actions go from general to specific both in terms of mitigation action design and location.

Recommendations

The following equity and environmental justice recommendations are based on multiple inputs, including insights from CBO interviews conducted by InterEthnica and the take-aways from this memo's literature review and policy and planning analysis grounded in C/CAG's Equity Framework.

Prioritize EFA-Supported Mitigation Action Categories/Strategies

Recommendation 1: Further develop and refine CBO-supported mitigation actions.

C/CAG and other lead agencies should complete the vetting and design of mitigation actions that are community-supported well in advance of funds becoming available so that "project readiness" is not an impediment to implementation.

The list of mitigation action categories below is organized based on the level of support from interviews with EFA-serving CBOs conducted by InterEthnica. Note that the list includes actions that were further developed after the interviews were conducted. Therefore, the fourteen actions are more numerous and, in some cases, more specific than the eight actions/strategies originally presented to interview participants. Mitigation actions will continue to grow and evolve as part of this process and after the VMT/GHG mitigation program is established.

Additional information on the full range of mitigation actions considered by C/CAG and the Project's Technical Advisory Task Force (TATF), is presented in the memorandum *C/CAG VMT/GHG Mitigation Program: Mitigation Measures and Program Alternatives* (March 2024). The selection of these fourteen mitigation actions was based on the following selection criteria, which considers both the technical analysis and CEQA requirements of each mitigation action:

- Substantial evidence that the action will reduce VMT
- Ability to improve regional mobility and transportation equity
- Availability of a clear and realistic cost estimate
- A demonstrated funding shortfall such that the action will not occur "but for" additional investment
- A clearly defined scope with demonstrated support from the community and elected officials
- Can be scaled up/down based on available funding

Additional mitigation actions should be added over time during and after Program development. It would be advisable for such actions to be grounded in the needs and priorities of EFA residents and leaders. An important starting point for identification of EFA needs and priorities are the Community-Based Transportation Plans (CBTPs) and General Plan Environmental Justice (EJ) Elements that have already been completed and those that are in the process of

being completed.¹⁴ CBTPs have been completed for the following jurisdictions and communities in San Mateo County:

| | | |
|-----------------------------------|------------------|--------------------------------|
| East Palo Alto, 2004; | Bayshore, 2008; | North Central San Mateo, 2011; |
| San Bruno/S. San Francisco, 2012; | Daly City, 2023; | S.E. San Mateo County, 2023; |

Table 10: VMT mitigation action project list, implementing agencies, and CBTP inclusion, in order of level of support from CBO interview participants

| Mitigation Action Category (In order or level of support from CBOs) | Mitigation Action | Mitigation Type | Implementing Agency/Organization | Inclusion in CBTPs |
|---|--|----------------------|---|--|
| Affordable housing | Build Affordable Housing | Land Use | SMC Department of Housing | Considered outside of the scope of prior CBTPs |
| Biking/walking paths | Bicycle Infrastructure | Capital Project | Participating Local Jurisdictions | Bayshore; Daly City; North Central San Mateo; San Bruno / South San Francisco; Southeast San Mateo |
| Transit enhancements | Rail Service Frequency Expansion | Operational Project | Caltrain (evaluated in this report) or BART | |
| | Local Transit Frequency, Capacity, and Reliability Enhancement | Operational Project | SamTrans | Bayshore; Daly City; East Palo Alto; North Central San Mateo; San Bruno / South San Francisco; Southeast San Mateo |
| | Transit Priority Projects on Major Corridors | Capital Project | SamTrans / Caltrans | Southeast San Mateo |
| | Shuttle Services/Microtransit | Operational Project | SamTrans or Commute.org | Bayshore; Daly City; East Palo Alto; North Central San Mateo; Southeast San Mateo |
| First/last mile services | Mobility Hubs | Operational Project | TBD | Likely not a commonly understood or available concept during past CBTPs |
| | First/Last Mile Micromobility Services | Operational Project | TBD | Daly City; Southeast San Mateo |
| Community travel planning | Community Based Travel Planning | Programmatic Project | Commute.org, TMA's, CBO's | Bayshore; East Palo Alto; North Central San Mateo; San Bruno / South San Francisco |
| Subsidy programs | Transit Pass Incentives | Programmatic Project | MTC (Evaluated in this report), C/CAG, SamTrans, Caltrain, or Commute.org | Bayshore; Daly City; East Palo Alto; North Central San Mateo; San Bruno / South San Francisco; Southeast San Mateo |
| | Countywide E-Bike Rebate Program | Programmatic Project | Peninsula Clean Energy or other local or countywide jurisdictions or CBOs | Daly City; Southeast San Mateo; San Bruno / South San Francisco |
| EV charging facilities | TBD | Capital Project | Peninsula Clean Energy | |

¹⁴ [Community-Based Transportation Plans \(CBTPs\) | Metropolitan Transportation Commission \(ca.gov\)](https://www.metro.net/about-us/our-organization/department-of-transportation-and-traffic-engineering/transportation-planning-and-strategy/)

| | | | | |
|---------------------------------|-----|-----------------|-----------------------------------|--|
| Parking program/curb management | TBD | Capital Project | Participating Local Jurisdictions | |
|---------------------------------|-----|-----------------|-----------------------------------|--|

Note that many CBTP recommendations have yet to be implemented, often because of lack of funding to further plan, design, and implement the projects or programs. An important equity-oriented support role that C/CAG can play for cities and other agencies is to secure funding for necessary planning, design, and engineering for unfunded but high-priority CBTP projects and programs (and other existing EFA and EJ needs assessments) to be ready to be funded by the countywide and/or local programs.

One caveat to leveraging past planning reports is that needs and preferences may have evolved, and new strategies may have emerged. For example, some CBTPs are over 10 years old. While C/CAG recently updated two CBTPs and is currently updating two additional ones, there may still be cases where substantial time has elapsed since the last needs assessment for a community and where further consultation should take place.

Finally, if C/CAG and other agencies would like to continue to entertain the mitigation actions that received the least community support, namely EV charging facilities and parking program/curb management, it is advisable that modified versions of these mitigation actions, more centered around equitable outcomes, be shared with EFA representatives to gauge whether the level of support changes as a result. For example, a paid parking / curb management strategy could be incorporated with a parking benefit district to ensure that the revenues provide on-going benefits and off-set any new burden on EFA focused communities.

Center EFA-Serving CBOs and EFA Leaders in the Design of Mitigation Actions

Recommendation 2: Co-create mitigation actions with EFAs and impacted communities.

Mitigation actions will become more concrete and specific over time. This presents an opportunity for community-based planning or co-creation with EFA-serving CBO's and EFA leaders in the areas where the actions are being considered. Such an approach can increase the utility of mitigation actions for local EFAs and the level of community support.

Recommendation 3: Identify and work towards addressing gaps in EFA representation in existing advisory and decision-making body(ies).

It is important to consider what advisory and decision-making bodies are best suited to provide recommendations and make decisions regarding VMT/GHG mitigation actions specifically and the Program more broadly. It is also important to consider the composition of such bodies and the degree to which they are made up of EFAs and equity leaders. How can any gaps in representation be addressed, including the formation of a new advisory body or bodies? Can lead agencies diversify their existing committees and commissions by adding equity/EFA seats to committees/commissions and incorporating equity-criteria into the selection process for open seats? Equity and EFA leaders can provide guidance to lead agencies around important questions such as:

- In what circumstances and to what degree should mitigation funds from a local VMT/GHG-generating project go towards a larger countywide or regional mitigation action that may have a greater reduction in VMT/GHG and socioeconomic disparities compared to funding a smaller local mitigation action?
- What new mitigation actions should be prioritized for inclusion in the program?
- How can the design of a planned mitigation action be improved to increase benefits to different EFA demographics, such as low-income single parent households and people with disabilities?
- How should mitigation actions be amended over time to achieve greater VMT/GHG and equity benefits (see Recommendation 9 below)?

Emphasize Equity Advancement and the Reduction of Disparities in the Application of Mitigation Actions

Recommendation 4: Set a target for EFA investments to be greater than the proportion of the EFA population countywide or within your city or agency’s jurisdiction (whichever is greater). Lead agencies should determine the relative proportion of the population that EFA geographies and demographics represent within their jurisdiction and set a minimum investment threshold based on those figures. For example, if EFAs represent 30% geographically of the countywide population, C/CAG and other countywide agencies should commit to investments that are focused on and benefit at least 30% of those geographies. Ideally agencies should strive to set investment targets that are substantially higher than what the actual EFA population represents to avoid maintaining existing inequities.

Recommendation 5: Use context-sensitive strategies to reach EFA investment targets. The following are options for mitigation action investment strategies that can generate benefits for EFA geographies:

- Fund affordable homes for families experiencing lower incomes in areas designated by CTCAC/HCD as [Neighborhood Opportunity areas](#), especially if such areas are located within a half mile of frequent bus or rail service. Consider the inclusion of a local preference policy so that available units are made available to nearby residents in need.
- Invest 100% of a project’s mitigation funds towards mitigation actions within EFAs, regardless of whether the project is in an EFA or not. This may include transferring mitigations from non-EFAs to the nearest possible EFAs, including within the same jurisdiction.
- Invest project mitigation funds in both the impacted community (local program) and larger scale mitigation actions that carry greater VMT/GHG and equity benefits (countywide program).
- Emphasize projects or programs that span both the community where the project impact is to take place and a nearby EFA that would receive some of the mitigation benefit. Examples of this might be:
- Invest in concentrated pockets of low income and other EFA demographics that do not show up on the primary equity screening tools, including C/CAG’s EFA map. An

example of this would be a mobile home park or farmworker housing located in an otherwise high-income area.

- Invest in programs that are targeted to EFA demographics throughout a jurisdiction or at the countywide level, such as free or subsidized transit pass programs.

From a mitigation action prioritization standpoint at either the countywide or city-level, projects may be screened (pass/no pass) if they directly serve or benefit EFA geographies. Alternatively, or in addition to screening, mitigation actions may be given points for degree of EFA benefit as part of a larger point system that includes VMT/GHG reduction potential and other indicators.

Recommendation 6: Analyze project equity benefits and burdens and design of mitigation actions around achieving equitable outcomes. CEQA and NEPA require environmental analysis and review of potential impacts of transportation and land use projects and a close nexus between project impacts and mitigation actions. In other words, as it relates to VMT/GHG reduction, lead agencies must study the potential impacts of a proposed project but are not legally permitted to require project sponsors to reduce overall emissions beyond anticipated impact.

This same standard, however, does not apply to the question of equity. CEQA guidelines do not require analysis of socioeconomic or equity impacts in the environmental review process; however, they also do not preclude agencies from conducting such assessments through (or in addition to) the environmental review process. Furthermore, there is no nexus requirement between impact and mitigation action that applies to equity. This means that a) lead agencies and project sponsors can analyze equity benefits and impacts of a project and b) can orient mitigation actions around equity advancement, not just mitigation (harm avoidance or reduction).

One key concern related to this recommendation is the lack of resources among countywide agencies and local planning departments for conducting additional analyses above and beyond the current staff workload. Cities and agencies will need to find an achievable middle ground between equity assessment and staff capacity, such as varying degrees to which agencies and cities embed equity metrics/analyses into existing environmental assessments. This may also be a key area where resourcing, capacity building, and technical assistance from C/CAG and/or regional or state agencies may be vital. For example, cities may benefit from toolkits, examples of best practices, and training in conducting effective equity analyses.

Recommendation 7: Design mitigation actions with universal access lens. Lead agencies should consider how mitigation actions are oriented around the preferences and needs of EFA populations, including youth, seniors, people with disabilities, households living below the poverty line and the unbanked, people with limited English proficiency, low-wage workers such as those in the agricultural and service industry, and single parent households. For example, if mitigation funds are to be invested in a non-EFA business district, can the mitigation action be focused on the needs and preferences of service workers employed at the local businesses? If mitigation funds are to be spent along a non-EFA transit corridor, can the mitigation action help provide more low-income households with an affordable transit-accessible place to live? Can

transit infrastructure upgrades provide raised platforms for easy boarding for people of all abilities and life circumstances?

Establish Policies and Procedures for Evaluating, Monitoring, Reporting, Learning, and Continuous Improvement

Recommendation 8: Use metrics or key performance indicators (KPIs) to evaluate equity benefits of potential mitigation actions, track outcomes, report, and improve effectiveness over time. It is assumed that VMT/GHG reduction effectiveness/benefit will be estimated/projected for each mitigation action, and that such data will assist lead agencies with prioritization among mitigation actions and evaluating the effectiveness of mitigation actions over time. Such actions should also be prioritized based on equity advancement effectiveness/benefit (outcome equity) based on quantitative and qualitative metrics or key performance indicators (KPIs). Such equity measurements should similarly be monitored over time. Ongoing monitoring and evaluation can and should lead to adjustments to the mitigation action(s) as applicable for both GHG/VMT and socioeconomic disparity reduction effectiveness. Examples of mitigation action KPIs may include number of low-income families benefiting from affordable homes built due to investment from the mitigation action program, or number of transit trips taken for participants in the affordable transit pass program.

One recurring concern raised in relation to conducting equity analyses is that cities and other agencies face budgetary and staffing constraints. Furthermore, many jurisdictions do not have processes in place to track their existing or historic mitigation measures. This presents an opportunity for C/CAG and/or other countywide, regional, or state agencies to provide guidance and support for equitable VMT mitigation monitoring. For example, might mitigation monitoring be more appropriate if conducted at a countywide or regional level?

Recommendation 9: Report and obtain input on mitigation action and program effectiveness and adjustments to EFA voices and other impacted populations over time. Communication and engagement strategies can be used to report on progress and changes to mitigation actions and program outcomes to impacted communities and equity/EFA leaders. This can include indicators such as percentage of mitigation action spending in EFAs and number of mitigation actions funding priority actions or recommendations within equity-focused needs assessments. Such reporting presents an opportunity to both inform and obtain input and direction from equity/EFA leaders and impacted populations on how adjustments to mitigation actions and the overall program should be made to improve equity outcomes. The reporting body(ies) may be formal or informal depending on need and resources and be established at the county-wide level. A natural place to start may be to convene on an ad-hoc basis with a small group of equity-focused CBO representatives. C/CAG and/or other agencies can provide participants with progress reports and seek input/recommendations. Examples of monitoring and reporting strategies that may be applicable to this opportunity include:

- Establishing an online equitable VMT/GHG dashboard as a central repository of data and associated visuals (graphs, tables, etc) related to Program and mitigation action investments and outcomes.
- Identifying or establishing an advisory committee or working group to periodically review Program and mitigation action outcomes and provide input and recommendations related to Program and mitigation action adjustments over time.
- Publish multilingual electronic and/or hard-copy newsletters that cover many agency topics, including VMT/GHG Program and mitigation action updates.
- Presentations to local CBOs and other types of institutions representing and/or serving the needs of EFA geographies and demographics, especially communities impacted by projects and/or benefiting from mitigation action investments.

Appendix I: Equitable VMT Checklist

The following checklist is intended to assist planners and policy makers in structuring an equitable VMT program for their respective jurisdictions.

Mitigation Actions:

- Set a target for EFA investments to be greater than the proportion of the EFA population countywide or within your jurisdiction (whichever is greater). There are a wide range of strategies that can be used to reach EFA investment targets, including:
 - Maximize EFA investment from each individual project's mitigation funds, regardless of whether the VMT-generating project is located within an EFA.
 - Invest in countywide-level actions focused on EFA demographic benefit. Use a universal access lens to tailor actions around the needs of EFA populations, such as people with disabilities, households living below the poverty line, people with limited English proficiency, low-wage workers, and single parent households.
 - Invest in actions that span both the community where the project impact is to take place and a nearby EFA that would receive some of the mitigation benefit.
 - Invest in areas with concentrated EFA demographics that do not show up on equity screening tools due to the small size of the population relative to the larger population of the geographic area of analysis.
 - Fund affordable homes for families experiencing lower incomes in areas designated by CTCAC/HCD as [Neighborhood Opportunity areas](#).
- Consider screening for mitigation actions that directly serve or benefit EFA geographies. Alternatively, or in addition to screening, consider establishing a point system to prioritize mitigation actions based on equity and other evaluation criteria.
- Maximize the number of EFA-supported mitigation actions that are “shovel-ready” well before VMT mitigation funds become available by vetting and conducting necessary planning, including for potential actions within Community Based Transportation Plans.
- Consider co-creating mitigation actions with EFA-serving CBO's and leaders to increase their utility and level of EFA community support.

Analysis of Benefits and Impacts:

- Assess the equity impacts (positive and negative) of projects and mitigation actions. Such analyses can be infused within or in tandem with environmental assessments.
- Use equity metrics or key performance indicators (KPIs) to quantify the benefits and burdens of projects and mitigation actions, and to track outcomes over time. Adjust mitigation actions based on the results of ongoing monitoring.

Representative Decision-Making and Accountable Reporting:

- Consider what committees are best suited to provide recommendations regarding VMT/GHG mitigation and work towards addressing gaps in EFA representation.
- Report and obtain input on mitigation action and program effectiveness and adjustments from EFA voices and impacted populations over time.

Appendix II: Equitable Development Planning Tool

Introduction:

The following tool is composed of a series of questions intended to assist agency staff at the county and local level in applying an equity lens at the earliest stages of transportation and land use development projects.¹⁵ The questions are tiered off C/CAG's [Equity Framework Planning Toolkit](#), which in turn borrows significantly from the Seattle Public Utilities [Equity Planning Toolkit](#). The tool is a suggested starting point and should be amended to meet the unique needs and circumstances of local and countywide agencies over time.

How to use the tool:

Lead staff can use the tool to apply early in the scoping and/or early planning phases of proposed development projects, and it is recommended that it be shared internally with other staff for feedback, at a minimum. Especially for projects that are planned/proposed by cities and county agencies, a co-creation approach with EFA CBOs and leaders is recommended. This tool can help gain alignment in the approach to project development with EFA constituencies.

At the end of each process, staff should document and report back to other agency staff on equity outcomes, lessons learned, and proposed changes to the tool and the equity approach moving forward. Such reporting can also take place with those that participated in the process, including co-creation community partners and decision makers.

Respond the following prompts with members of your team:

Project name:

Agency or City, and Department:

Lead staff:

Additional staff involved with responding to the prompts below:

Geography of activity:

Activity relevance:

- Does the proposed project have any relevance for equity advancement and/or Equity Focus Area (EFA) geographies or demographics?
 Yes No
- Will the project create greater disparities in the community it affects?

¹⁵ An equity lens is a critical thinking approach to undoing racial and economic disparities by evaluating burdens, benefits, and outcomes to underserved communities (City of San Antonio, 2021).

Yes

No

If you answered no to the above questions, skip the rest of this tool. If you responded yes to either question, continue responding to the following questions.

Equitable Development Review Questions and Considerations:

Staff should use the questions below as guidance in thinking through various considerations and factors. Not all questions will be applicable in all circumstances.

1. How will you set or make recommendations for the direction and scope of the project to address historic & existing inequities and avoid further harm to Equity Focus Area (EFA) geographies and demographics?

- a. What underserved and impacted communities and demographics may be affected (positively or negatively) by the development project?
- b. How might this project affect (positively or negatively) racial or socioeconomic disparities?
- c. What are the goals and intended outcomes for this project, and how might the goals/outcomes be amended to advance equity in San Mateo County?
- d. Has there been consultation/communication with leaders/representatives from these communities in crafting the direction/scope to the proposed project? How has input from leaders/representatives from these communities been incorporated in the project?

2. How will you obtain a greater understanding of disparities related to the project? How will benefits & burdens to EFA geographies & populations be identified?

- a. Will you evaluate the existing and/or historic disparities related to the project?
- b. Will environmental review include analysis of the costs and benefits for EFA geographies and demographics? What will/might the analysis consist of?
- a. How will you incorporate the identification, consideration, and selection of strategies to advance equity and avoid/minimize burdens as part of the process?
- b. What evaluation measures/metrics will you include or encourage to identify the degree to which disparities exist and/or be ameliorated?
- c. What information, including qualitative and quantitative data, is needed to understand the costs and benefits of the proposed project?

3. How can the community engagement plan/approach for this project be structured to help lead to equitable participation?

- a. What are the key milestones and decision-making points in the process, and how will input received over the process be used?
- b. What EFA geographies or demographics will require more-targeted outreach or engagement to ensure equitable participation and outcomes?

- c. How will you encourage greater participation and structure the process in such a way to give greater voice and influence for under-represented, historically impacted, and/or currently underserved communities and demographics?
 - i. How will you provide the necessary information to participants to ensure they can provide informed and meaningful input?
 - ii. How will your outreach and engagement efforts be culturally relevant and linguistically appropriate?
 - iii. Are there opportunities to leverage the outreach and engagement efforts of other current or planned agency and/or city initiatives?
 - iv. What resource needs do you have to ensure meaningful engagement?
 - v. Is funding available for CBO and community partnerships to increase participation? If so, to what degree and for what purposes and steps in the process may the funding be used for?
 - d. When and how will you keep stakeholders and participants in the process informed of key milestones and decision-making points, including how input received influenced the project or decision?
 - e. How will you measure the success of the engagement process?
 - f. How will project outcomes be reported back to impacted communities and EFA leaders?
- 4. What steps will be taken or encouraged to ensure shared prosperity, including equitable procurement and Disadvantaged Business Enterprise (DBE) participation in project planning and implementation?**
- 5. Identify next-step tasks and considerations informed by your responses above. Be sure to incorporate them into your timeline and work plan.**

Appendix III: San Mateo County Community Based Transportation Plan (CBTP) Recommendations

Bayshore

| Table 5-1 Recommended Pedestrian Projects and Plans | | Mitigation |
|---|---|---|
| Recommendation | Responsible Agency | Action Category |
| Provide Circulator Shuttle Service - Provide shuttle service that serves the Bayshore neighborhood, SamTrans and Muni bus stops, BART, and Daly City. Service would operate for 10 hours on weekdays and 6 hours on weekends. | San Mateo County Transit District; City of Daly City | Shuttle / Microtransit Services |
| Provide Discounted Taxi Rides to Medical Facilities - Provide discounts to low-income residents for taxi rides to medical facilities from the Bayshore neighborhood | City of Daly City | Transit Pass Incentives |
| Subsidize School Bus Service - Procure funding to subsidize the existing school bus service provided by the Jefferson School District that transports students from the Bayshore neighborhood to high schools. | Jefferson School District | Shuttle / Microtransit Services |
| Provide Shuttle Service to Kaiser Medical Offices -Provide shuttle service that connects Kaiser Medical Facilities in South San Francisco and Daly City with BART. | Kaiser Permanente | Shuttle / Microtransit Services |
| Provide Fixed-Route Transit Service - Extend SamTrans Route 121 to serve the Bayshore neighborhood. | SMC Transit District | Local Transit Frequency, Capacity, and Reliability Enhancements |
| Improve Transit Stops - SamTrans - Improve the SamTrans bus stop at Bayshore Blvd and Geneva Ave by adding a shelter and other amenities. | SMC Transit District; City of Daly City; City of Brisbane | Pedestrian Infrastructure |
| Improve Transit Stops - Muni - Improve two Muni bus stops (Santos Street and Geneva Avenue and the inbound stop at Rio Verde Street and Geneva Ave) by adding a shelter and other amenities | SFMTA, the City of Daly City, City of San Francisco | Pedestrian Infrastructure |

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| Enhance Pedestrian Safety -Provide sidewalks on four sections of Bayshore Blvd and Main Street to provide easier and safer access to SamTrans bus stops from the Bayshore neighborhood. Install pedestrian-scale lighting throughout the neighborhood. | The City of Daly City and the City of Brisbane | Pedestrian Infrastructure |
| Improve Bicycle Infrastructure - Provide bicycle lanes from Geneva Ave to Bayshore Blvd and provide bike racks at nearby transit stops. | The City of Daly City | Bicycle Infrastructure |
| Improve Taxi Service Information - Provide information on available taxi services for Bayshore residents. | The City of Daly City | Community Based Travel Education |
| Increase Public Awareness about Transportation Options - Provide information about the available public transit options and create a specially tailored map of transportation options. | SMC Transit District; SFMTA | Community Based Travel Education |
| Provide Transit Information in Different Languages - Translate the SamTrans How to Ride Guide, Bus System Map, and Transit Information Guide into Chinese and distribute upon request. | SMC Transit District and SFMTA | Community Based Travel Education |
| Improve Affordability of Transfers between Transit Systems - Develop a mechanism for providing discounted transfers between SamTrans and Muni at stops near the border with San Francisco. | SMC Transit District and SFMTA | Transit Pass Incentives |
| Subsidize Monthly Transit Passes for Low Income Riders - Make transit more affordable and increase low-income resident mobility. Subsidized passes could be made available at pass vendor outlets or through the Human Services Agency to individuals furnishing proof of low-income status. | The City of Daly City, SMC Human Services Agency (HSA), and SMC Transit District | Transit Pass Incentives |

[Daly City](#)

| Table 5-1 Recommended Active Transportation Projects and Plans | | Mitigation Action Category |
|---|---------------------------|-----------------------------------|
| Recommendation | Responsible Agency | |
| Study potential alternatives for high-visibility crosswalks at the intersection of Serramonte Boulevard and Highway 1 ramps. | Daly City | Pedestrian Infrastructure |
| Improve Daly City BART Station access for pedestrians travelling eastbound on John Daly Boulevard with improved markings, signalization and directional signage at the intersection of John Daly Boulevard and Niantic Avenue, consistent with 2020 City of Daly City Pedestrian and Bicycle Master Plan. | Daly City and BART | Pedestrian Infrastructure |
| Create a more pedestrian-safe Geneva Avenue: Install crosswalks with curb extensions at Allan St and Talbert Street | Daly City | Pedestrian Infrastructure |

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| Install Class IV bikeway on State Route 82 in unincorporated Colma, per Unincorporated San Mateo County Active Transportation Plan | San Mateo County | Bicycle Infrastructure |
| Install signage and pavement markings to better designate existing Class II bike lanes on Geneva Avenue between Santos Street and Bayshore Boulevard | Daly City | Bicycle Infrastructure |
| Improve the intersection of Mission Street / E. Market Street / San Pedro Road with a pedestrian island and high-visibility or "3D" crosswalks. | Caltrans/ Daly City | Pedestrian Infrastructure |
| Study bicycle and pedestrian network conditions and conflicts within ½ mile of the Daly City and Colma BART Stations. Include recommendations for active transportation network improvements, infrastructure projects and micromobility programs designed to increase bike/ped safety and close "first-mile-last-mile" gaps. | C/CAG, SMC Transportation Agency | Bicycle/Pedestrian Infrastructure |
| Perform a feasibility study of a ped/bike pathway from the terminus of Reiner Street in unincorporated Colma to the Colma BART station, on unimproved land beyond the soundwall adjacent to the Station | San Mateo County, Daly City, BART | Bicycle/Pedestrian Infrastructure |
| Develop a micromobility implementation guidebook for local jurisdictions to support efficient roll-out of bikeshare, e-scooter and other micromobility programs. The guidebook should include a framework for: • Engaging community members to get input on preferred micromobility programs. • Identifying type(s) of micromobility program(s) for maximum community benefit. • Locating micromobility vehicle access and parking areas. • Designing safe and accessible micromobility routes that close "first-mile-last-mile" transit gaps. • Contracting with third party vendors | C/CAG | Micromobility Systems |
| Improve access to electronic bikes via equity programs for both shared e-bikes and individually owned e-bikes | C/CAG, San Mateo County Daly City | Micromobility Systems |
| Study the repurposing of Hillside Boulevard in Unincorporated Colma into a Class IV bikeway | San Mateo County | Bicycle Infrastructure |
| Increase number of bike lockers at Colma BART station from eight to 20, consistent with Daly City BART Station. | BART | Bicycle Infrastructure |
| Study the development of a Class IV bikeway (per Unincorporated San Mateo County Active Transportation Plan) and series of safer pedestrian crossings on Hillside Blvd. in Unincorporated Colma | San Mateo County, Daly City | Bicycle Infrastructure |
| Install Class III bike route on Mission Street from Westake Avenue to San Pedro Road, per 2020 City of Daly City Pedestrian and Bicycle Master Plan. | Caltrans | Bicycle Infrastructure |

| Table 5-2 Recommended Transit and Paratransit Projects and Plans | | Mitigation |
|---|---------------------------------------|---|
| Recommendation | Responsible Agency | Action Category |
| Broaden multi-lingual information and awareness campaign of Clipper START program to include transit stops, stations and high-activity destinations in Equity Priority Communities | MTC | Community Based Travel Education |
| Add NACTO and ADA compliant bus shelters at the following stops of the following SamTrans route to improve access to neighborhood supermarket: • Route 110 bus stop at Southgate Ave and Westmoor Avenue, near Ranch 99 Market at 250 Skyline Plaza, Daly City. | SamTrans, Daly City | Pedestrian Infrastructure |
| Add NACTO and ADA compliant bus shelters at the following stops of the following SamTrans route to improve access to neighborhood supermarket: • Route 122 bus stop at Callan Street and King Drive, near Manilla Oriental Market at 950 King Drive Suite 112, Daly City. | SamTrans, Daly City | Pedestrian Infrastructure |
| Add NACTO and ADA compliant bus shelters at the following stops of the following SamTrans route to improve access to supermarket: • Route 130 bus stops on Hillsdale Blvd between Gambetta St and Bismark St, near Mission Plaza at 6843 Mission St, Daly City. | SamTrans, Daly City | Pedestrian Infrastructure |
| Add NACTO & ADA compliant bus shelters at Mission Street/Eastlake Ave. and Mission Street/Parkview Ave., near MidCity Market at 6718 Mission St, Daly City. | SamTrans, Daly City | Pedestrian Infrastructure |
| Implement a 2022 San Mateo County Paratransit Rider’s Guide "How-to Tour." Introduce tour-goers at senior centers, medical facilities and social service organizations to the basics of paratransit eligibility, sign-up, routing and ride process. | San Mateo County, SamTrans, Daly City | Community Based Travel Education |
| Develop implementation strategies for equity mobility programs that encourage mode shift, such as the 2021 101 Express Lanes Community Benefits Program. | C/CAG, San Mateo County, Daly City | Community Based Travel Education |
| Increase the frequency of the City of Daly City’s Bayshore Shuttle to include limited weekend service. | Daly City | Local Transit Frequency, Capacity, and Reliability Enhancements |
| Install NACTO and ADA compliant bus stops along SamTrans Route 130. | SamTrans | Pedestrian Infrastructure |
| Program a new Guadalupe Canyon Pkwy SamTrans route connecting Bayshore and Serramonte. | SamTrans | Local Transit Frequency, Capacity, and Reliability Enhancements |

| Table 5-3 Recommended Safety Projects and Plans | | Mitigation |
|---|--|---------------------------|
| Recommendation | Responsible Agency | Action Category |
| Install curb extensions at intersections on community-identified informal “racetracks” on the following Bayshore neighborhood rights-of-way: ●Entire length of Ottilia Street ●Entire length of Partridge Street ●Accacia Street from Geneva Avenue to Bay Ridge Drive | Daly City | Pedestrian Infrastructure |
| Implement Safe Routes to School infrastructure, including traffic calming techniques such as lane narrowing, bulb-outs, and rapid flashing beacons at: ●Bayshore Elementary School ●Thornton High School ●Daniel Webster Elementary ●Westlake Elementary School ● Jefferson High School | Daly City, Bayshore Elementary Unified School District, Jefferson Elementary School District, Jefferson Union High School District | Pedestrian Infrastructure |
| Execute a Memorandum of Understanding (MOU) between Daly City leadership and Cow Palace Board of Directors (State of California Department of Food and Agriculture’s division of Fairs and Expositions) to develop a community-sensitive event scheduling and safety campaign | Daly City, State of California | Pedestrian Infrastructure |
| Improve lighting at loading areas, bus bays and areas between the station footprint and loading area and bus bays, at Colma BART Station. | BART | Pedestrian Infrastructure |

North Central San Mateo

| | | Mitigation Action |
|--|---|---|
| Recommendation | Responsible Agency | Category |
| Improve Existing School Bus Service | San Mateo - Foster City School District | Shuttle / Microtransit Services |
| Augment Existing Transportation Service to Better Serve Key Destinations | SamTrans | Local Transit Frequency, Capacity, and Reliability Enhancements |

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| Increase Frequency of Existing Transit Service | SamTrans | Local Transit Frequency, Capacity, and Reliability Enhancements |
| Reinstate the San Mateo Medical Center Shuttle Program | San Mateo Medical Center | Shuttle / Microtransit Services |
| Establish Local Safe Routes to School Program | San Mateo County Office of Education | Community Based Travel Education |
| Improve Transit Stop Amenities | SamTrans, City of San Mateo | Pedestrian Infrastructure |
| Improve Pedestrian Amenities | City of San Mateo | Pedestrian Infrastructure |
| Improve Bicycle Amenities | City of San Mateo | Bicycle Infrastructure |
| Improve Affordability of Public Transit for Low-Income Users | HSA, SamTrans | Transit Pass Incentives |
| Increase Public Access to Information about Transportation Options | SamTrans, Clipper/ Cubic | Community Based Travel Education |

[San Bruno/S. San Francisco](#)

| | | Mitigation Action Category |
|--|---|---|
| Recommendation | Responsible Agency | |
| Improve Transit Stop Amenities and Security | SamTrans | Pedestrian Infrastructure |
| Improve Affordability of Public Transit for Low-Income Users | MTC, HSA | Transit Pass Incentives |
| Improve Bicycle Amenities | San Bruno, South San Francisco, C/CAG, SamTrans, BART, Caltrain | Bicycle Infrastructure |
| Provide Free or Lowcost Bicycles | CBOs | Countywide E-Bike Rebate Program |
| Improve Pedestrian Amenities | San Bruno, South San Francisco | Pedestrian Infrastructure |
| Increase Public Access to Information about Transportation Options | CBOs, SamTrans | Community Based Travel Education |
| Increase SamTrans Bus Service | SamTrans | Local Transit Frequency, Capacity, and Reliability Enhancements |

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| Improve Connectivity of Existing Transit Service | SamTrans | Local Transit Frequency, Capacity, and Reliability Enhancements |
| Improve Access to the South San Francisco Caltrain Station | Caltrain, South San Francisco | Pedestrian Infrastructure |

Southeast San Mateo County

| Table 5-1 Recommended Pedestrian Projects and Plans | | Mitigation Action Category |
|--|--|-----------------------------------|
| Recommendation | Responsible Agency | |
| Complete pedestrian safety improvements near & on the Ringwood Ave. Pedestrian Bridge, including implementing a lighting plan & performing walk audits to identify access & safety improvements along Pierce Rd. at the Newbridge St./Market Pl. intersection & along Van Buren Rd. at Ringwood Ave. | Menlo Park | Pedestrian Infrastructure |
| Reset the timing of traffic signals at Chilco St. and Bayfront Expwy. to allow for adequate pedestrian crossing times. | Menlo Park | Pedestrian Infrastructure |
| Implement the initial steps toward developing a vehicle Speed Enforcement Program for Bayfront Expwy., including preparation of a Comprehensive Plan, outreach to law enforcement agencies and Identification of a Stakeholder Task Force, and completion of a Historical Risk, Speed and Crash Assessment. | Menlo Park, adjacent jurisdictions, Caltrans | Pedestrian Infrastructure |
| Close all sidewalk gaps on East Bayshore Rd. from Poplar Ave. to Euclid Ave. in response to pedestrian fatalities. | East Palo Alto | Pedestrian Infrastructure |
| Perform safety audits and install intersection safety improvements such as signalization controls, pedestrian islands, flashing beacons, high-visibility crosswalks and/or physical traffic calming elements, at the following intersections: ● Bayfront Expwy. & Willow Rd. ● Bayfront Expwy. & Chilco St. ● Bayfront Expwy. & Chrysler Dr. ● Bayfront Expwy. & Marsh Rd. ● University Ave. & Runnymede St. ● Marsh & Bay Rd. ● Marsh & Middlefield Rd. ● Cooley & University Ave. ● Oakwood Dr. & East Bayshore Rd. ● Newbridge St. & Willow Rd. ● Willow Rd. & Ivy Dr. ● Willow Rd. & O'Brien Dr. ● Willow & Hamilton Rd. | East Palo Alto, Redwood City, Menlo Park, San Mateo County | Pedestrian Infrastructure |
| Widen sidewalks, close sidewalk gaps & install parking controls along West Bayshore Rd. between Cooley and Woodland Ave. | East Palo Alto | Pedestrian Infrastructure |

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| Assess sidewalk deficiencies & implement new sidewalks on the west side of Pulgas Ave. from E. Bayshore Rd. to University Ave. | East Palo Alto | Pedestrian Infrastructure |
| Install Rectangular Rapid-Flashing Beacons (RRFB) with curb extensions at on- and off-ramps on both sides of Highway 101 at the Whipple Ave. overcrossing in Redwood City | Redwood City, Caltrans | Pedestrian Infrastructure |
| Install a High-Intensity Activated Crosswalk & median improvements at SR 82 & Selby Lane in Atherton. | Atherton, San Mateo County, Caltrans | Pedestrian Infrastructure |

| Table 5-2 Recommended Bicycle and Micromobility Projects and Plans | | Mitigation Action Category |
|---|--------------------------------|-----------------------------------|
| Recommendation | Responsible Agency | |
| Implement the North Fair Oaks bicycle boulevard network in the area between Middlefield Rd., 5th Ave., ECR and the unincorporated County/ Redwood City limits, per the N. Fair Oaks Bike/Ped Railroad Crossing and Community Connections Study. | San Mateo County | Bicycle Infrastructure |
| Install a Class I bike path on Seaport Blvd. from Broadway to E. Bayshore Rd., per the SMC Comp. Bike/Ped Plan, & from Veterans Blvd. to Hwy. 101 per RWC Moves. | San Mateo County, Redwood City | Bicycle Infrastructure |
| Install a grade- separated pedestrian/bicycle crossing of Caltrain tracks in North Fair Oaks between 5th Ave. and RWC limits, labeled high-priority in the 2021 SMC Active Transportation Plan. | San Mateo County, Caltrain | Bicycle Infrastructure |
| Install Class IV cycle track on El Camino Real between Finger Ave. and north of Berkshire Ave, per RWC Walk Bike Thrive | Redwood City | Bicycle Infrastructure |
| Install a Class IV bikeway on the segment of El Camino Real bordering N. Fair Oaks, per the SMC Active Transportation Plan. | San Mateo County | Bicycle Infrastructure |
| Fill bikeway gaps on Middlefield Rd. between 5th Ave. and Atherton with a Class II bikeway, per the SMC ATP. | San Mateo County | Bicycle Infrastructure |
| Install Class IV facility on Brewster Av. from Main St. to King St. to connect Sequoia H.S. and Caltrain, per RWC Walk Bike Thrive. | Redwood City | Bicycle Infrastructure |
| Study upgrading the Class III bike route along Woodland Ave. to a Class IV or other separated bike facility & implement as feasible. | East Palo Alto | Bicycle Infrastructure |
| Study bike/ped conditions & conflicts within ½ mile of Caltrain stations and major transit stops in the study area. | C/CAG, SMC, Redwood City | Bicycle Infrastructure |
| Develop a micromobility implementation guidebook for local jurisdictions to support efficient roll-out of bikeshare, e-scooter and other micromobility programs. | C/CAG | Micromobility Systems |

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| Upgrade the existing bike facility on Willow Road between Bayfront Expressway and Highway 101 to a Class IV separated bikeway, per the City of Menlo Park Transportation Master Plan. | Menlo Park | Bicycle Infrastructure |
| Implement Menlo Park Transportation Master Plan project #178 and Caltrans District 4 Bike Plan Project #SM-101-X14: Design and develop a bicycle/pedestrian bridge over Hwy 101 north of Marsh Rd., with connections to Bay Trail and Bedwell Bayfront Park. | Caltrans, Menlo Park | Bicycle Infrastructure |
| Install Class II buffered bike lanes on Marsh Rd. from Bay Rd. to Scott Dr. per the 2020 San Mateo Transportation Master Plan | Menlo Park | Bicycle Infrastructure |
| Improve access to electronic bikes via equity programs for both shared e-bikes and individually owned e-bikes. | C/CAG, SMC, RWC, EPA, Menlo Park, Pen. Clean Energy | Micromobility Systems |
| Install buffered bike lanes on Alameda de las Pulgas, from Brewster to De Anza Ave. as considered in RWC Walk Bike Thrive. | Redwood City | Bicycle Infrastructure |
| Install Class IV bikeways on Bay Rd. & Marsh Rd. in North Fair Oaks per the 2021 Unincorporated SMC Active Transportation Plan. | San Mateo County | Bicycle Infrastructure |

| Table 5-3 Recommended Transit and Paratransit Projects and Plans | | Mitigation |
|---|---|--|
| Recommendation | Responsible Agency | Action Category |
| Broaden awareness campaign of Clipper START program to include multi-lingual information at transit stops, stations & high-activity destinations in SESM EPCs. | MTC | Community Based Travel Education |
| Implement a multi-lingual awareness campaign of SamTrans' new East Palo Alto On-Demand Zone, including how to download and use the program App and use the service. | SamTrans | Community Based Travel Education |
| Implement transit-only lanes or transit signal priority infrastructure on Newbridge St., Bay Rd. and University Ave from Menlo Park to the Palo Alto Transit Station to improve Caltrain access by Menlo Park and East Palo Alto residents. | SamTrans, East Palo Alto, Menlo Park, Palo Alto, Caltrain, San Mateo County | Transit Priority Projects on Major Corridors |
| Implement a 2022 SMC Paratransit Rider's Guide "How-to Tour." Introduce participants at senior centers, medical facilities and social service organizations to the basics of paratransit eligibility, sign-up, routing and ride process. | SamTrans | Transit Priority Projects on Major Corridors |

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| Audit ground & curb conditions at bus & paratransit stops to identify uneven sidewalks, lack parking/vehicle deterrents & missing or ADA noncompliant bus shelters, including at the EPA Senior Center, Ravenswood Health Clinic, RWC Kaiser Medical Center, Fair Oaks Health Center, & VA Medical Center. | SamTrans | Pedestrian Infrastructure |
| Develop implementation strategies for equity mobility programs such as the 101 Express Lanes Community Benefits Program. | C/CAG, SMC, RWC, EPA, Menlo Park | Community Based Travel Education |
| Add shelters to SamTrans route 296 stops at Middlefield Road and Fifth Avenue to improve shopping experience for those at Chavez Supermarket at 3282 Middlefield Rd. | SamTrans, San Mateo County | Pedestrian Infrastructure |
| Survey physically and sensory-impaired visitors to hospitals, senior centers and social service facilities in SamTrans' SESM Equity Priority Area to identify drop-off-to-destination (and reverse) wayfinding and access challenges & solutions. | SamTrans | Pedestrian Infrastructure |
| Add shelters to SamTrans route 270 stops at Bay Rd. & 5th Ave. to improve shopping experience for those at Mi Tienda Market. | SamTrans, City of Redwood City | Pedestrian Infrastructure |
| Decrease current 1+ hour headways of City of Menlo Park Belle Haven Shuttle by 25 percent. | Menlo Park | Local Transit Frequency, Capacity, and Reliability Enhancement |
| Program an east-west running SamTrans route along 5th Ave. through North Fair Oaks to provide better connections from Middlefield Rd. to SamTrans Routes 296 and ECR. | SamTrans | Local Transit Frequency, Capacity, and Reliability Enhancement |

| Table 5-4 Recommended Safety Projects and Plans | | Mitigation |
|--|---|---------------------------|
| Recommendation | Responsible Agency | Action Category |
| Assess queuing impacts to public streets during peak drop-off/pick-up hours at Belle Haven Elementary School, Garfield Community School, North Star Academy/McKinley, Aspire East Palo Alto Charter School, TIDE Academy | RWC, EPA, Menlo Park, Ravenswood City School District, RWC School District, Aspire Public Schools, Sequoia Union H.S.D. | Pedestrian Infrastructure |

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| <p>Complete a pedestrian safety assessment in North Fair Oaks North, including for areas of dumping and/or blight, lighting “deserts”, & poor sidewalk conditions</p> | <p>San Mateo County</p> | <p>Pedestrian Infrastructure</p> |
| <p>Implement Safe Routes to School infrastructure, including traffic calming techniques such as lane narrowing, speed humps, bulb-outs, and rapid flashing beacons at Belle Haven Elementary School, Garfield Community School, North Star Academy/McKinley, Aspire EPA Charter School, TIDE Academy, Sequoia H.S., KIPP Esperanza H.S., Sequoia District Adult School</p> | <p>Ravenswood School District, RWC School District, Aspire Public Schools, Sequoia Union H.S.D., KIPP Public Schools, Menlo Park, RWC, EPA</p> | <p>Pedestrian Infrastructure</p> |
| <p>Support the completion of Objective 4, Data Gathering, and Objective 5, Engineering Routes to School, of the East Palo Alto Safe Routes to School 5 Year Work Plan.</p> | <p>East Palo Alto</p> | <p>Pedestrian Infrastructure</p> |
| <p>Increase safety for students of Menlo-Atherton High School who live in East Palo Alto and Belle Haven, via improved bike/ped infrastructure on Coleman Ave. and Ringwood Ave. per 2023 Coleman/Ringwood Transportation Study.</p> | <p>San Mateo County</p> | <p>Pedestrian Infrastructure</p> |