

March 25, 2016



Tham Nguyen
Transportation Planning Manager, Metro
One Gateway Plaza, Mail Stop 99-22-6
Los Angeles, CA 90012

March 25, 2016



EMAILED TO: nguyentha@metro.net

RE: Comments on Metro's Draft Active Transportation Strategic Plan

Dear Ms. Nguyen,

On behalf of Investing in Place and the undersigned Los Angeles County-based organizations, we thank Metro for the opportunity to comment on the draft Active Transportation Strategic Plan (ATSP). Investing in Place works with partners across Los Angeles County to support equitable transportation investments, support great neighborhoods, and improve safety and access for all – especially for those traveling by bus, rail, walking and bicycling. We look forward to supporting Metro in their efforts to implement the ATSP and a Long Range Transportation Plan that meets the mobility needs of all.

Metro is the primary planner, funder, designer, and builder of the region's transportation system. As such, Metro has a unique role in making sure that all of the elements of the transportation system – even those built and operated by other agencies – work together to provide safe, accessible, and reliable transportation options. Because Los Angeles is one of the country's largest, most populous counties, Metro has a unique opportunity to lead the nation by example by prioritizing healthy active transportation modes. People walking and biking are at the greatest risk of injury and death while traveling, and therefore deserve increased attention from the region's transportation agency to ensure that their needs are met.

We commend the draft ATSP for its comprehensive approach to planning for active transportation in Los Angeles County, recognizing the respective roles of Metro and partner agencies to deliver critical transportation improvements for residents. As Metro updates its Long Range Transportation Plan and considers how to allocate the revenue from a potential additional ballot measure, it is critical for Metro to continue this comprehensive approach to ensuring that the most basic mobility needs of all Los Angeles County residents are met.

Specifically, we applaud Metro's draft ATSP for addressing first and last mile implementation. The case studies, cost estimates, infographics, and cost-benefit analyses provide actionable information for local agencies seeking to improve access to bus and rail stops. These are useful tools that will help stakeholders implement this plan. With over 83% of Metro bus riders accessing transit by walking, these cost estimates can inform future Metro capital projects and retrofits for the transit and

highway network. The draft ATSP's existing conditions analysis of over 660 bus stops and rail stations will help Metro plan and prioritize projects, bringing the agency one step closer to developing shovel-ready projects to improve safe access to transit and local destinations.

Investing in Place and its partners want to underscore the need for a social equity policy definition at Metro to enable prioritization and implementation of these infrastructure needs for the stops and stations outlined in the draft ATSP. The ATSP provides a wealth of data indicators, but we see the need for Metro to define its areas of high investment based on social equity benchmarks.

The City of Los Angeles' Safe Routes to School program can be a case study for creating a project prioritization plan that includes social equity metrics. Their plan successfully quantified the need for safe routes to over 500 schools, leveraged funding, and created a sequencing plan that was based on need, not political geographic boundaries.¹ For implementation of its first and last mile planning, we believe Metro should follow a similar prioritization process that is methodical and prioritizes high-needs communities.

To further help with defining social equity needs, Investing in Place is pleased to be working with Metro staff, researchers, and practitioners throughout the County in our Transportation Equity Technical Working Group.² We are developing recommendations for the Metro Board of Directors to define social equity at the neighborhood and regional level in order to prioritize high-needs investment areas. Investing in Place and its partners aim to have these policy recommendations for the Metro Board to review this year and we welcome Metro staff input throughout the process.

To ground our approach, Investing in Place strongly supports transportation equity definitions written by the USC Program for Environmental and Regional Equity. They write that transportation equity is:³

1. Equitable access to quality, affordable transportation options and, therefore, employment, services, amenities, and cultural destinations.
2. Shared distribution of the benefits (e.g., jobs) and burdens (e.g., pollution) of transportation systems and investments.
3. Partnership in the planning process that results in shared decision-making and more equitable outcomes for disadvantaged communities, while also strengthening the entire region.

That said, we understand a plan is only as good as its available funding. The plan identifies a range of \$11.0 to \$29.5 billion needed to make all communities in Los

¹ For more information, please visit http://investinginplace.org/2015/10/28/cityof-la_srts_bestpractice_funding/ and <http://saferoutes.lacity.org/>

² For more on Investing in Place's Transportation Equity Technical Working Group, please visit <http://investinginplace.org/2016/03/10/announcing-our-los-angeles-county-transportation-equity-technical-working-group/>

³ USC Program for Environmental and Regional Equity. (2013). An Agenda for Equity: A Framework For Building a Just Transportation System in Los Angeles County. https://dornsife.usc.edu/assets/sites/242/docs/Executive_Summary_Agenda_for_Equity_PER_E_A.pdf

Angeles County safe and accessible for walking and biking, with annual expenditures between \$737 million and \$1.69 billion for building a high-quality network throughout the county. Considering the need for safer streets – especially safe, reliable, and affordable transportation options for individuals with disabilities, older adults, and youth – we hope funding from the potential 2016 transportation ballot measure addresses the need identified in this plan.

Overall, we believe the draft ATSP is an exemplary blueprint for building out Los Angeles County's active transportation network. Investing in Place and its partners recommend that the draft ATSP be adopted with a prioritization plan for the over 660 bus stops and rail station improvement areas. Identifying social equity benchmarks at an early stage of the first and last mile planning in the draft ATSP can help inform revenue discussions and the Long Range Transportation Plan update. We encourage Metro to continue pursuing local, regional, state, and federal funding opportunities, including the potential 2016 transportation sales tax measure, to align transportation investments with the needs as outlined in the draft ATSP.

For any questions, please contact Jessica Meaney at jessica@investinginplace.org or 213-210-8136. Thank you for your consideration of these comments.

Sincerely,

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