February 25, 2016

Laurie Waters, Associate Deputy Director
California Transportation Commission
1120 N Street, MS-52
Sacramento, CA 95814

VIA E-MAIL: laurie.waters@dot.ca.gov

Re: Disadvantaged Communities Recommendations for the Active Transportation Program (ATP) Cycle 3 Guidelines & Application

Dear Ms. Waters,

On behalf of the undersigned Los Angeles County-based organizations, we commend the California Transportation Commission (CTC) and your leadership in the implementation of the Active Transportation Program (ATP) as a comprehensive statewide commitment to expand safe travel for all - for those traveling on foot or bicycle. For many communities in Los Angeles County, the ATP is the only significant source of funds for improving walking and bicycling conditions. Below, we outline our recommendations on the proposed changes for the ATP program.

Recommendation 1: Retain Full 10 Points for Disadvantaged Communities.

We value the program’s emphasis on disadvantaged communities. This prioritization of funding by demonstrated data and need is tremendous. A model we are inspired to see in the implementation of California’s Cap and Trade funds as well, it is promising to see State transportation and housing funding take this strategic approach. At the February 3rd ATP workshop held in downtown Los Angeles the handout on the summary of proposed changes reflected reducing the maximum number of points available for benefit to Disadvantaged communities from 10 to 5. We are concerned to see this and recommend that the full 10 points are retained. It has been exciting to see the ATP program place a data driven emphasis on need and safety in the allocation of funds, we encourage you to maintain this approach.

This approach addresses a clear need in our communities throughout Los Angeles County. Providing dedicated points to disadvantaged communities helps these communities overcome the difficulties presented by lack of matching funds, dedicated staff working on safe routes to school and walking and bicycling projects, and/or funds to develop, adopt, and implement plans.

Applicants should be required to clearly demonstrate, document, and substantiate how the project is addressing a community-identified mobility, safety, employment/economic, public health and/or community-vitality barrier and/or need, as
well as how DAC residents were directly engaged to identify and develop solutions to overcome barriers/needs. Examples of direct benefits could include:

**Mobility Benefit**
- Removes or mitigates DAC resident-identified physical barrier to walking and/or biking (e.g., installs sidewalks or bike lanes on routes DAC residents use to access community services and schools)
- Removes or mitigates DAC resident-identified social barrier to walking and/or biking (e.g., provides culturally and linguistically appropriate pedestrian and/or bicycle safety education)
- Removes or mitigates DAC resident-identified economic barrier to walking and/or biking (e.g., providing free bicycles, helmets, or locks to DAC-residents)
- Addresses lack of existing active transportation infrastructure that poses safety and health hazards to DAC residents (e.g. curb expansion, sidewalks and bike lane implementation to facilitate access to community-identified resources)

**Safety Benefit**
- Addresses DAC resident-identified traffic safety concern (e.g., high traffic speeds, lack of physical separation, etc.)
- Addresses DAC resident-identified personal safety concern (e.g., inadequate lighting, community violence, few eyes on the street, etc.)

Example mitigations include, community walking clubs and adequate lighting to ensure that the community’s significant number of residents that have nontraditional employment schedules will be able to access the project at night.

**Employment/Economic Benefit**
- Improves non-motorized access for an identified DAC population served by the project to job centers—which may include public or private employment and at schools with job centers—where they are demonstrated to work.
- Improves non-motorized access by an identified DAC population served by the project to public transportation that takes them to job centers—which may include public or private employment and at schools with job centers—where they are demonstrated to work. These improvements should be specifically identified by the DAC population served.
- Utilizes targeted local hiring or community workforce agreements to benefit an identified DAC population in project construction/implementation.
Public Health
- Increases non-motorized access by DAC residents to parks and open space within walking/biking distance from their homes.
- Directly addresses a key health disparity experienced and identified by DAC residents in the project vicinity (e.g., project constructs walking path and hosts culturally and linguistically appropriate walking clubs targeted to residents at risk of diabetes or heart disease)

Community Vitality
- Addresses DAC resident-identified safety concerns regarding blight (e.g., project includes component to enable youth to paint community murals of pedestrian and bicycle safety messages along the project’s proposed project ROW)
- Increases non-motorized access by DAC residents to public spaces (e.g. plazas, parklets, etc.) within walking/biking distance from their homes.

Recommendation 2: Enable MPO Discretion for Setting Aside Funds for Planning in Disadvantaged Communities.
Less than a quarter of cities and counties in California have an adopted safe routes to school, pedestrian, bicycle, or combined bicycle/pedestrian master plan. The lack of active transportation planning in our state is dire, and this is even more pronounced in our disadvantaged communities. Robust active transportation plans are critical to ensuring that agencies have identified and prioritized high quality, effective infrastructure projects for future funding applications. Planning efforts serve as necessary venues for resident outreach and engagement to identify community-supported needs for active transportation. We recommend that the Guidelines provide flexibility for MPOs to set a higher set-aside for planning in disadvantaged communities in excess of state’s 2% set-aside.

We thank you for the opportunity to provide feedback on the Cycle 3 Guidelines and Application, and we look forward to working with you to strengthen the Active Transportation Program. Please contact Jessica Meaney at 213-210-8136 or jessica@investinginplace.org with any feedback or questions on this letter.

Sincerely,
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