April 23, 2014

The Honorable Diane DuBois, Chair
Metro
One Gateway Plaza
Los Angeles, CA 90012-2952

RE: California Active Transportation Program (ATP) Transition Policy (Item #8)

Dear Chair DuBois and Metro Directors:

Over the past year, Metro has made significant progress on active transportation-related policies, including the First/Last Mile Strategic Plan before you for adoption and several policies in development such as a Countywide Complete Streets Policy, Countywide Safe Routes to School Strategic Plan and Active Transportation Strategic Plan. Together, these planning efforts help implement Metro’s commitments under the 2012 Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS) in partnership with SCAG. While these planning efforts are promising, they have not informed Metro’s current approach to the new state Active Transportation Program (ATP), the largest dedicated source of funding for walking, bicycling and safe routes to school in California. We appreciate Metro’s growing leadership on addressing the incredible need for investment in active transportation in Los Angeles County, but find the staff recommendation for the ATP Transition Policy to fall far short of what is needed to strategically invest in active transportation. We believe that in transitioning to ATP, Metro should foster fair competition to ensure that the best projects are funded in the short term while developing a long-term investment strategy to address the needs identified by Metro’s ongoing planning efforts.

Lack of Countywide Active Transportation Policy Framework

As described in our attached February 2014 letter, the ATP is a new statewide competitive grant program that provides funding for walking, bicycling and safe routes to school projects and programs. A portion of ATP funds were formerly programmed by Metro as part of the Call for Projects (CFP) but due to changes in federal and state allocations they will now be administered through a statewide and regional competition. This transition requires a strategic approach by Metro to ensure the best outcome for all Los Angeles County residents as we transition to the new competitive grant program, rooted in an accurate understanding of needs and investment objectives for active transportation.

In February, the board directed staff to evaluate former CFP projects for alignment with new state criteria and develop a list of projects that will compete effectively in the new program. We appreciate staff’s efforts to develop this list in coordination with affected cities and provide grantwriting assistance to relieve the burden of this transition on local jurisdictions. In February,
the board further requested staff to conduct outreach to cities to make them aware of the ATP funding opportunity and encourage new projects. However, based on the April 21st staff report on this effort,

“Metro does not know the number and types of new projects which the local jurisdictions and other eligible agencies plan to submit for funding.”

Without knowing this, it is difficult to envision the impact staff’s recommendation to give previously awarded Call for Projects an immediate 10 point advantage will have on these other applications. This approach sends a mixed message to cities who have been investing considerable resources in preparing ATP applications for new projects, only to find out less than one month before applications are due, that they could start the competition 10 points behind other projects. The uncertainty created by this policy is undermining local cities and school districts’ efforts to develop competitive and successful applications to this year’s ATP grant cycle. **Most impacted by the proposed policy are safe routes to school projects, which were never a category in Metro’s Call for Projects.** Notably, the staff reports continue to stay silent on safe routes to school.

We encourage the board to recognize the impacts of this proposed policy and instead ensure a level playing field for all great ideas and efforts emerging in Los Angeles County, at least until the aforementioned planning efforts yield true countywide priorities. This is especially critical for safe routes to school projects for which there is currently no countywide policy framework to assess the needs of one of our most vulnerable and underserved populations. As discussed in the staff report, Metro’s proposed staff recommendation does not make Los Angeles County more competitive for ATP funds. **Instead, the staff recommendation would reallocate funds away from new projects that are more in line with current priorities to old projects that are otherwise of lower quality.**

The Safe Routes to School National Partnership and Los Angeles County Bicycle Coalition support the direction discussed at both the April 2014 Ad Hoc Sustainability Committee and Planning & Programming Committee to create a level playing field by awarding the full 10 points to all projects consistent with local and/or regional active transportation plans in this round of funding. This will allow projects to be selected by their scoring on state criteria, including effectiveness in encouraging walking and bicycling, focus on serving school-age populations and public engagement in collaborative and innovative planning processes. To the extent that old CFP projects are not competitive under current priorities, Metro should aim to rescope these projects in time for future ATP cycles or fund them locally.

**Preparing for Future Funding Opportunities with Regional Planning**

We are encouraged by the contemplation of a regional competition in future cycles as we believe Los Angeles County to be inherently competitive for these funds due to high need, once those needs are assessed and investments prioritized. We hope that Metro staff will pursue this idea with SCAG in future funding cycles to demonstrate that the region is capable of competitively allocating funding to the most meritorious projects that advance RTP/SCS objectives.

Metro has an essential role in preparing the region for future funding opportunities, including future ATP cycles, cap-and-trade and future transportation sales taxes. To ensure that quality projects are developed and prioritized to meet the needs of the county, Metro must join its peer agencies in Southern California by developing a clear strategy for prioritizing projects for local,
state and regional funding. Cities, school districts and all interested stakeholders must be included as partners in advancing the success of active transportation in Los Angeles County to ensure that needs are accurately represented in future identified regional priorities.

**Following Through on Commitment to Expedite Active Transportation Funding**

Fundamentally, Metro’s current predicament with ATP is a function of the agency’s over reliance on limited state and federal funding sources for active transportation. Los Angeles County is a self-help county with close to 70% of transportation investments coming from locally generated revenue. These funds are by and large not being leveraged for active transportation and safe routes to school, requiring cities to rely on state and federal grants like ATP for 80 to 90 percent of their walking and bicycling funds.

In 2012, SCAG and Metro signed a memorandum of understanding (MOU) in which Metro agreed to “Expedite Active Transportation Funding.” The staff report detailing Metro’s ATP proposal notes a shortfall of $90 million dollars over six years due to the changes in state and federal funding allocation models. While it is understandable that Metro would seek to recapture some of these dollars through the ATP process, Metro is missing an opportunity to restructure and expand its commitment to funding active transportation with other available revenue sources. We strongly urge Metro to continue its commitment to projects previously funded through the Call for Projects and to increase its use of local funding for these projects.

Over the coming year we hope to see Metro devote greater attention to active transportation planning, project development and finance strategy to ensure that Los Angeles County is better prepared for future ATP cycles, and work in partnership with local jurisdictions to identify needs. For more background on the ATP and Los Angeles County active transportation policy, please visit our website at: [http://saferoutescalifornia.org/losangelescounty/](http://saferoutescalifornia.org/losangelescounty/). Thank you for your consideration of these comments.

Sincerely,

Jessica Meaney  
Southern California Policy Director  
Safe Routes to School National Partnership

Eric Bruins  
Planning and Policy Director  
Los Angeles County Bicycle Coalition

cc: Art Leahy, CEO, Metro  
Patricia Chen, Metro  
Mitch Weiss, Deputy Director, California Transportation Commission  
Hasan Ikhrata, Executive Director, SCAG  
Sarah Jepson, Manager, Active Transportation and Special Programs, SCAG

Attachment:  
The Honorable Diane DuBois, Chair
Metro
One Gateway Plaza
Los Angeles, CA 90012-2952

California Active Transportation Program Transition (Item #20)

Dear Chair DuBois and Metro Directors:

The Active Transportation Program (ATP) is a new statewide competitive grant program that encourages bicycling and walking, especially for children traveling to school and for residents of disadvantaged communities. Los Angeles County critically underfunds walking and bicycling, with only one percent of the Metro Long Range Transportation Plan allocated toward these modes, despite a mode share of 19 percent and a 39 percent share of roadway fatalities. As the county’s transportation planning agency, Metro’s role in this program should be coordinate a regional strategy to address this underfunded need by competing for Los Angeles County’s share of funding from the statewide call. By focusing on regional competitiveness, Metro can support cities as they align their new and previous projects with new state criteria. Without a regional strategy, Los Angeles County is unlikely to capture its share of this new competitive program, leaving money on the table that could otherwise address critical needs in our communities.

The Safe Routes to School National Partnership (National Partnership) and Los Angeles County Bicycle Coalition (LACBC) urge Metro to adopt regional competitiveness as Metro’s overriding policy objective for the Active Transportation Program and work with staff to develop a strategy to maximize the share of funds likely to be awarded to projects in Los Angeles County. Such a strategy could include:

- Metro analyzes the overall statewide program size and sets a competitive goal for projects from Los Angeles County (e.g. 30% of overall ATP funding).
- Metro identifies the most competitive of its queued-up projects based on new ATP criteria (not the previous Call for Projects criteria) and project readiness, equal to no more than Metro’s prior TE programming authority over the three fiscal years included in the ATP (FY13-14 through FY15-16).
- Metro provides direct grantwriting services to the projects identified above, and general
technical assistance to all Los Angeles County applicants.

- Metro allows applicants to rescope and recalculate local match for all projects that are reapplying to ATP to better align projects with new state criteria.
- Metro identifies all eligible local funding sources for active transportation that might be used for projects awarded funding through prior Calls for Projects.
- Metro staff reports back to the board in March on a finance strategy that leverages local revenue with ATP funds to fund all previously awarded projects through fiscal year 2015/16.

This approach is not a substitute for a long-term strategy for funding active transportation in Los Angeles County, but it is a reasonable way to compete for our share of the ATP in the absence of an Active Transportation Strategic Plan that better defines Metro’s priorities and local finance strategy. The National Partnership and LACBC are appreciative of the practical challenge presented by the loss of programming authority for Transportation Enhancements, but do not support staff’s proposal to pursue a cumbersome reapplication process that does not position Los Angeles County to compete effectively in a new program with new criteria.

The ATP is an exciting opportunity for Los Angeles County, which has among the highest demonstrated need for this funding. We hope to see Metro take a leadership role in positioning the entire county to be competitive for these funds in the upcoming May call and all future cycles by developing a robust policy framework and financing strategy for walking and bicycling.

For more background on the ATP and Los Angeles County active transportation policy, please visit our website at: http://saferoutescalifornia.org/losangelescounty/. Thank you for your consideration of these comments.

Sincerely,

Jessica Meaney
Southern California Policy Director
Safe Routes to School National Partnership

Eric Bruins
Planning and Policy Director
Los Angeles County Bicycle Coalition

cc: Art Leahy, Metro CEO
Patricia Chen, Metro
Mitch Weiss, Deputy Director, California Transportation Commission
Sharon Neely, Deputy Executive Director, SCAG
Sarah Jepson, Manager, Active Transportation and Special Programs, SCAG