

Memorandum

To: CHAIR AND COMMISSIONERS

CTC Meeting: March 16-17, 2016

Reference No.: 4.19  
Information

From: WILL KEMPTON  
Executive Director

Subject: **HEARING ON THE 2017 ACTIVE TRANSPORTATION PROGRAM (ATP) GUIDELINES**

**ISSUE:**

On September 26, 2013, the Governor signed legislation creating the Active Transportation Program (ATP) (Senate Bill 99, Chapter 359 and Assembly Bill 101, Chapter 354). This legislation requires the Commission, in consultation with an ATP Workgroup, to develop program guidelines. The Commission guidelines describe the policy, standards, criteria, and procedures for the development, adoption and management of the ATP.

The ATP workgroup met four times in January and February of 2016 to discuss revisions to the guidelines. Stakeholders also submitted numerous comment letters and emails suggesting revisions to the guidelines. Staff considered all the feedback received through the workgroup meetings and correspondence and made revisions that were considered feasible and beneficial to the program.

The ATP Guidelines may be amended by the Commission after conducting at least one public hearing. This public hearing is to take final comment on the proposed 2017 ATP Guidelines prior to Commission adoption.

**BACKGROUND:**

The goals of the Active Transportation Program are to:

- Increase the proportion of biking and walking trips.
- Increase safety for non-motorized users.
- Increase mobility for non-motorized users.
- Advance the efforts of regional agencies to achieve greenhouse gas reduction goals.
- Enhance public health, including the reduction of childhood obesity through the use of projects eligible for Safe Routes to Schools Program funding.
- Ensure disadvantaged communities fully share in program benefits.
- Provide a broad spectrum of projects to benefit many types of active transportation users.

Attachment  
Correspondence

**ATTACHMENT**

**2017 ATP GUIDELINES  
CORRESPONDENCE**

**From:** [Kenneth Kao](#)  
**To:** [Janssen, Laurel@DOT](#); [Waters, Laurie@DOT](#)  
**Cc:** [Joel Goldberg](#); [Sarah J. Jepson](#); [Zhang, Xi@DOT](#); [Nitsos, April M@DOT](#); [Davini, Ted E@DOT](#); [Sarkes M. Khachek](#); [Anne Richman](#); [Ross McKeown](#)  
**Subject:** MTC Comments on ATP Cycle 3  
**Date:** Tuesday, December 22, 2015 10:05:31 AM  
**Attachments:** [Ltr- ATP3 Comments 2015-12-18.pdf](#)

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Greetings Laurel and Laurie,

I've attached MTC's comments on the upcoming ATP Cycle 3.

Note that given the proposed expedited schedule for Cycle 3, MTC will work on the regional guidelines for adoption by MTC in February, and ask that the CTC approve our guidelines at the same time as the statewide guidelines in March (under the current schedule).

Please let me or Anne know if you have any questions on our comments.

Thank you for your consideration, and happy holidays,  
Kenny

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**Kenneth Kao**

Senior Planner, Programming and Allocations  
Metropolitan Transportation Commission (MTC)  
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w (510) 817-5768 f (510) 817-5848



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December 22, 2015

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Santa Clara County

*Jake Mackenzie, Vice Chair*  
Sonoma County and Cities

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Cities of San Mateo County

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and Urban Development

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*Scott Wiener*  
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*Amy Rein Worth*  
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*Steve Heninger*  
Executive Director

*Alix Bockelman*  
Deputy Executive Director, Policy

*Andrew B. Fremier*  
Deputy Executive Director, Operations

**Will Kempton**  
Executive Director  
California Transportation Commission  
1120 N Street, Room 2221 – MS 52  
Sacramento, CA 95814

RE: Active Transportation Program (ATP) Cycle 3 Comments

Dear Mr. Kempton:

Thank you for the opportunity to comment on the upcoming Active Transportation Program (ATP) Cycle 3 Guidelines and Process. Current law mandates that the California Transportation Commission (CTC) adopt the next cycle of ATP projects by April 1, 2017. MTC would like to offer a few comments and suggestions from our experience in administering the region's large-MPO share of ATP.

• **Delay Guidelines adoption of 2017 ATP to June 2016**

Recognizing the statutory requirement to adopt the next program by April 1, 2017, MTC believes additional time is required to discuss and amend the Guidelines based on lessons learned from Cycles 1 and 2. The current schedule to adopt Cycle 3 Guidelines in March 2016 does not leave sufficient time to consider changes or comments. MTC encourages the CTC to delay the adoption of the Cycle 3 Guidelines to June 2016 in order to have a robust discussion about improving the Guidelines. This should still leave sufficient time for sponsors to complete the application (especially if the application is simplified), evaluators to review and score each application, and the CTC to meet the statutory April 1, 2017 adoption deadline.

• **Revisit disadvantaged communities in guidelines/application**

The region applauds ATP's goal of highlighting the active transportation needs of disadvantaged communities (DACs). With nearly 90% of ATP funds benefiting DACs over the first two ATP cycles, the CTC is clearly demonstrating support of these important areas. For Cycle 3, CTC should clearly indicate its emphasis on ATP funds benefiting DACs in order to be more transparent towards non-DAC sponsors. Non-DAC sponsors could then decide whether to devote substantial staff resources on the application if only 10% of ATP funds are awarded to non-DAC areas.

Alternatively, the CTC could consider another approach, such as reducing the points assigned to DACs, or instituting a target minimum that is above the 25% statutory minimum.

- **Revise and simplify application process**

A common comment from project sponsors was that the application was too onerous. For all sponsors trying to do more work with less staff and resources, completing the ATP application often required 40 to 80 hours of staff time. This resource strain is especially burdensome for smaller sponsors with limited staff, and may unfairly give an advantage to jurisdictions with resources to hire consultants to prepare the application. The region suggests simplifying the application and putting as much of it online as possible.

- **Create a two-tier program based on funding request size**

The complexity of the application manifested itself in the increased average per project ATP request in Cycle 2. Increased funding requests with funding remaining static means that fewer projects will be funded. MTC recommends that CTC consider creating a two-tier program based on funding request size, in order to encourage smaller projects to apply, which may translate to more projects being funded. For instance, two-thirds of the program could be dedicated for project requests over \$2 million, and those projects must complete the federal process and receive federal funds. The remaining one-third of the program could fund project requests under \$2 million, and could utilize state-only funding.

Thank you for your consideration of the region's comments. If you have any questions about our comments or any other ATP-related issues, please contact me at (510) 817-5722, [arichman@mtc.ca.gov](mailto:arichman@mtc.ca.gov), or Kenneth Kao, ATP Program Manager, at (510) 817-5768, [kkao@mtc.ca.gov](mailto:kkao@mtc.ca.gov).

Sincerely,



Anne Richman  
Director, Programming & Allocations

AR: KK

cc: April Nitsos, Caltrans ATP Program Manger  
Sylvia Fung, Caltrans District 4 Local Assistance Engineer  
Joel Goldberg, San Francisco MTA – ATP Technical Advisory Committee Member  
Sarkes Khachek, Santa Barbara CAG – RTPA Moderator

**From:** Eric Bruins  
**To:** [Waters, Laurie@DOT](mailto:Waters.Laurie@DOT)  
**Subject:** ATP Cycle 3 guidelines  
**Date:** Thursday, January 14, 2016 5:47:07 PM

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Laurie,

Thank you for our conversation yesterday. As chair of the ATP-TAC Planning Subcommittee, I look forward to reviewing the draft guidelines with our subcommittee.

Our subcommittee has identified the following focus areas. We have not arrived at any recommendations, but anticipate generating comments on the following topics:

- Refining the definition of an Active Transportation and/or SRTS Plan
- Increasing the funding mark for planning applications
- Streamlining the application process for planning applications
- Improving scoring consistency for planning applications
- Providing greater regional flexibility in guidelines

We look forward to working with you and the Commission to continue strengthening the Active Transportation Program.

Thank you for your consideration,  
-Eric

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**Eric Bruins**  
**Planning & Policy Director**  
**Los Angeles County Bicycle Coalition**

634 South Spring Street, Suite 821, Los Angeles, CA 90014  
[eric@la-bike.org](mailto:eric@la-bike.org) | (213) 629-2142 ext. 127  
[www.la-bike.org](http://www.la-bike.org) | [Facebook](#) | [Twitter](#) | [Instagram](#)

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## Central Coast Coalition

*Moving California's Economy*

January 14, 2016

Mr. Will Kempton  
Executive Director  
California Transportation Commission  
1120 N Street, Room 2233 (MS-52)  
Sacramento, CA 95814

Dear Mr. Kempton:

The Central Coast Coalition would like to thank the California Transportation Commission for the opportunity to provide input on Cycle 3 of the Active Transportation Program. The Coalition consists of the regional transportation planning agencies in San Benito, Santa Cruz, Monterey, San Luis Obispo, and Santa Barbara counties and the Association of Monterey Bay Area Governments. Our coalition members compete for ATP funding from the small urban/rural program in addition to the Statewide program.

We applaud the expeditious work by the CTC and Caltrans to program projects during Cycles 1 and 2 of the Active Transportation Program; however, we do have several suggestions that we believe will improve the effectiveness of the program. Below are our recommendations for Cycle 3 for consideration by the Commission.

1. Maintain the statutory schedule for Cycle 3 which requires that funds be awarded to projects by April 2017.

There is a significant backlog of bicycle and pedestrian projects and it is important to deliver a message to the legislature that more transportation funding of all kinds is sorely needed now. This message is best delivered by maintaining the ATP schedule set in statute, especially as the Governor and legislature develop the 2016-2017 budget. Delaying Cycle 3 of the ATP would require legislation and carries a significant risk of conveying the wrong message to the legislature that there is no urgency in providing funding for projects that support active transportation.

The Active Transportation Program is also a critical funding source for the small urban and rural counties we represent. The phase out of the STIP's Transportation Enhancement program eliminated a reliable, formula funding source for active transportation projects that were prioritized and selected by our boards following a community-based public outreach process and delivered by our local agencies. Instead, we must now compete via the Statewide and Small Urban/Rural components of the ATP to secure funding for critical projects in our regions as we do not receive a direct share funding like large MPOs. Being entirely reliant on statewide competitions to secure funding makes it challenging to plan for and deliver projects that are needed to meet the safety, environmental, and active-lifestyle goals of our communities. However, the rapid pace of the first two cycles coupled with the sheer magnitude of funding available has helped mitigate our loss of discretionary control over project selection and the loss of formula funding. So we encourage the Commission to stay the course and move forward with Cycle 3.

While many of projects have been funded through Cycles 1 and 2, there continues to be very high demand for ATP funding in our regions, and across the state. The CTC received nearly 1,400 applications requesting over \$2 billion in the first two cycles, while only \$720 million has been available for programming. Many of our Coalition's priority projects remain unfunded through Cycles 1 and 2; we have applications ready to be submitted for Cycle 3. It is critical that with this level of demand, the CTC move forward with conducting a call for projects in 2016.

2. If additional time is necessary to incorporate revisions, delay adoption of the guidelines by no more than two months.

An additional three months to adopt the Cycle 3 guidelines compared to prior cycles provides the Commission with the latitude to streamline the application and incorporate minor changes to the guidelines and project evaluation process, such as those we suggest below. However, if necessary, the CTC could consider adoption of the guidelines in May 2016 rather than March 2016 to accommodate minor changes. This schedule would still allow the CTC to adopt projects by the statutory deadline of April 1, 2017.

3. Ensure all of the goals of the Program are being advanced by making adjustments to the Project Scoring Criteria for Disadvantaged Communities and Non-Motorized Traveler Safety in Cycle 3

*Reduce the Weight Given to Projects in Disadvantaged Communities:*

We acknowledge that a goal of the ATP is to ensure that disadvantaged communities share in the benefits of the program. We believe that the first two ATP cycles have been successful in this regard. The CTC has programmed over 80% of ATP funds to projects that benefit Disadvantaged Communities over the first two cycles which far exceeds the 25% statutory requirement for the program. We believe it is reasonable in Cycle 3 to reduce the weight given to Disadvantaged Communities to provide more geographic equity, and ensure that other goals of the program are met.

As part of the scoring criteria for the program, ten points have been available to applicants that can demonstrate their project serves a Disadvantaged Community (DAC). These ten points, in such a highly competitive program, can be a barrier to projects that may not necessarily serve a DAC but still meet the goals of the Active Transportation Program by increasing the proportion of biking/walking trips, increasing safety and mobility for non-motorized users and advancing the efforts of regional agencies to achieve greenhouse gas reduction goals. **We recommend that the points for the Disadvantaged Communities section of the scoring be reduced from ten points to five points and that the criteria for increasing walking and bicycling/Section 1 be increased by five points.** With this approach, points will still be available to projects that serve Disadvantaged Communities and more points will be made available to the highest priority of the program which is to increase walking and bicycling among users.

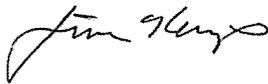
*Prioritize Projects that Reduce the Risk of Fatalities and Injuries to Non-Motorized Users:*

Finally, we also recommend that the CTC revise the scoring criteria for Safety/Section 2 to award points to projects whose purpose is to reduce the risk of collisions resulting in

fatalities and injuries to non-motorized users. It seems unreasonable to us to award points only after a record of fatalities and injuries have occurred. Critical safety projects that could prevent a loss of life or injury are at a disadvantage in the evaluation process with the present wording. Bicyclists and pedestrians are significantly more vulnerable to conflicts with cars and trains and perceived safety risks are a significant deterrent for active transportation. Relying solely on historical accident rates does not account for the potential increased usage of bike and pedestrian facilities when perceived safety risks are reduced.

Thank you for your consideration of these comments and suggestions. If you have any further questions, please contact Sarkes Khachek at the Santa Barbara County Association of Governments at 805-961-8913.

Sincerely,



Jim Kemp, Executive Director  
Santa Barbara Association of Governments



Ron DeCarli, Executive Director  
San Luis Obispo Council of Governments



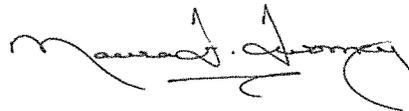
Debra L. Hale, Executive Director  
Transportation Agency for Monterey County



George Dondero, Executive Director  
Santa Cruz Co. Regional Transportation Commission



Mary Gilbert, Interim Executive Director  
San Benito Council of Governments



Maura Twomey, Executive Director  
Association of Monterey Bay Area Governments

cc: The Honorable Katcho Achadjian, Assembly Member, 35<sup>th</sup> District  
The Honorable Luis Alejo, Assembly Member, 30<sup>th</sup> District  
The Honorable Anthony Canella, Senator, 12<sup>th</sup> District  
The Honorable Hannah-Beth Jackson, Senator, 19<sup>th</sup> District  
The Honorable Bill Monning, Senator, 17<sup>th</sup> District  
The Honorable Mark Stone, Assembly Member, 29<sup>th</sup> District  
The Honorable Das Williams, Assembly Member, 37<sup>th</sup> District  
Mr. Bill Higgins, CalCOG  
Mr. Jerry Barton, Chair, Rural Counties Task Force  
Ms. Laurel Janssen, California Transportation Commission  
Ms. Laurie Waters, California Transportation Commission  
Ms. April Nitsos, Caltrans, Chief, Active Transportation Program and Special Programs

**From:** [Phil Dow](#)  
**To:** [Waters, Laurie@DOT](mailto:Waters, Laurie@DOT)  
**Subject:** FW: ATP Comments  
**Date:** Monday, January 25, 2016 4:53:58 PM

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Laurie:

Messed up your email extension!

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**From:** Phil Dow [<mailto:dowp@dow-associates.com>]  
**Sent:** Monday, January 25, 2016 4:48 PM  
**To:** 'laurie.waters@dot.cs.gov'  
**Cc:** Jesse Robertson ([robertsonj@dow-associates.com](mailto:robertsonj@dow-associates.com))  
**Subject:** ATP Comments

Laurie:

I have the following comments regarding proposed changes to scoring for Cycle 3:

1. Disadvantaged Communities: I oppose any reduction of points under this category. I think it is too early to tell with only two cycles complete whether or not the program excludes meaningful competitiveness for projects not in disadvantaged communities. It could be there is a lot of pent up demand for projects in these areas. Let's not abandon the 10 point advantage yet. I concur with the suggestion of Commissioner Burke that perhaps we should crank down the qualification to projects that will provide DIRECT BENEFIT to these communities. My bet is that will cut down the qualification for these points to a reasonable level. If not, consider reducing points in future cycles.
2. I understand that your intent in adding 5 points to Question #6 is to award points for Construction Readiness ONLY for those projects that were awarded ATP funding for Project Development (pre-construction ) work in a previous ATP cycle. This will account for scoring variability across scoring cycles using different reviewers. I understand that the State is reluctant to fund project development work without surety that the construction phase will score high enough to complete the project. I would think that most ATP projects would not be split like this unless the project sponsor fears complicated environmental issues or there is a history of environmental delays in the area of the project sponsor. An alternative is to require that information for the Construction phase be submitted with the Project Development application so that the competitiveness of the entire project is assessed up front. If scoring high enough, then the Project Development phase would be funded and the Construction phase would come "off the top" in a subsequent cycle. There will probably only be a handful of these to deal with each year. In that way there would be no need to add 5 points for Construction Readiness under Question #6 and it can remain at 5 points.
3. I appreciate the modification to Question #4 Improved Public Health. It is more straight-forward and requires less health research by us transportation people.

Thanks for the opportunity to comment.

**From:** [Murray Fontes](#)  
**To:** [Waters, Laurie@DOT](#)  
**Cc:** [Rachel Moriconi](#)  
**Subject:** Fwd: FW: 2017 Active Transportation Program Draft Guidelines and Application  
**Date:** Tuesday, January 26, 2016 10:11:16 AM  
**Attachments:** [1st Draft 2017 ATP Guidelines.pdf](#)  
[1st Draft 2017 ATP Application.pdf](#)  
[ATP 2017 Guidelines and Application 1st Workshop meeting notice final.pdf](#)

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Laurie,

Enclosed are my comments on the draft application for the Cycle 3 Active Transportation Program (ATP) grants.

Small, disadvantaged communities, like my employer, the City of Watsonville, have limited funding and resources that can be a disadvantage when competing statewide for funding. The competition is even more challenging when programs like the Active Transportation Program (ATP) segregate 40% of the funding by making it available only to agencies within larger Metropolitan Planning Organizations (MPOs) and still allow those MPOs to compete with smaller agencies for the remaining funding. The proposed revisions make it even more difficult for agencies like Watsonville to compete for funding as the changes will require agencies to commit more time and resources to the preparation of the applications or they will reduce the number of scoring points available. Listed below are specific examples of these changes and their negative impact.

Require Project Study Report (PSR) or equivalent (See Page 6 in the revised Guidelines and page 2 in the revised Application). The proposed revisions require a PSR or equivalent to use as screening criteria for infrastructure projects. Preparation of the proposed grant application form already requires a significant investment of staff time and resources. Adding the preparation of a PSR will increase the investment.

Reduce Scoring for Disadvantaged Communities (DACs) (Page 14 of Guidelines and Page 7 of Application). The proposed revision reduces the point total of Question #5 – Benefit to DACs from 10 to five points. A community that qualifies as disadvantaged lacks the financial and other resources to compete on a statewide basis for funding. The applications in the first two cycles acknowledged this by allowing DACs to qualify for an additional 10 points. Reducing the additional points from 10 to five makes it more challenging for the DACs to compete on a statewide level.

Increase Scoring for Construction Readiness (Page 14 of Guidelines and Page 9 of Application). The proposed revision adds a scoring category of Construction Readiness to Question #6 and provides up to five points for projects that have completed CEQA, NEPA and final design. Completion of CEQA and NEPA and final design represent significant costs and further stretch the resources of smaller or disadvantaged communities.

Applicants Performance on Past Grants (page 15 of Guidelines). The proposed revision eliminates assigning negative points to agencies with documented poor performance records on past grants. This allows non-performing agencies to be on equal footing with those agencies that have performed well. It rewards the non-performer and punishes the performer.

Please consider my concerns when finalizing the Cycle 3 application and thank you for the opportunity to comment.

Murray Fontes

----- Forwarded message -----

From: **Rachel Moriconi** <[rmoriconi@sccrtc.org](mailto:rmoriconi@sccrtc.org)>

Date: Tue, Jan 19, 2016 at 9:33 AM

Subject: FW: 2017 Active Transportation Program Draft Guidelines and Application

To: "Chris Schneiter ([cschneiter@cityofsantacruz.com](mailto:cschneiter@cityofsantacruz.com))" <[cschneiter@cityofsantacruz.com](mailto:cschneiter@cityofsantacruz.com)>, "Erich Friedrich ([efriedri@scmtd.com](mailto:efriedri@scmtd.com))" <[efriedri@scmtd.com](mailto:efriedri@scmtd.com)>, Maria Esther Rodriguez <[maria.esther.rodriguez@cityofwatsonville.org](mailto:maria.esther.rodriguez@cityofwatsonville.org)>, "Mark Dettle ([mdettle@cityofsantacruz.com](mailto:mdettle@cityofsantacruz.com))" <[mdettle@cityofsantacruz.com](mailto:mdettle@cityofsantacruz.com)>, Murray Fontes <[murray.fontes@cityofwatsonville.org](mailto:murray.fontes@cityofwatsonville.org)>, "Piet Canin ([pcanin@ecoact.org](mailto:pcanin@ecoact.org))" <[pcanin@ecoact.org](mailto:pcanin@ecoact.org)>, "Russell Chen ([dpw109@co.santa-cruz.ca.us](mailto:dpw109@co.santa-cruz.ca.us))" <[dpw109@co.santa-cruz.ca.us](mailto:dpw109@co.santa-cruz.ca.us)>, "Scott Hamby ([shamby@scottsvalley.org](mailto:shamby@scottsvalley.org))" <[shamby@scottsvalley.org](mailto:shamby@scottsvalley.org)>, "Steve Jesberg ([sjesberg@ci.capitola.ca.us](mailto:sjesberg@ci.capitola.ca.us))" <[sjesberg@ci.capitola.ca.us](mailto:sjesberg@ci.capitola.ca.us)>, "Steve Wiesner ([dpw199@co.santa-cruz.ca.us](mailto:dpw199@co.santa-cruz.ca.us))" <[dpw199@co.santa-cruz.ca.us](mailto:dpw199@co.santa-cruz.ca.us)>, "Teresa Buika ([tabuika@ucsc.edu](mailto:tabuika@ucsc.edu))" <[tabuika@ucsc.edu](mailto:tabuika@ucsc.edu)>, "thiltner@scmtd.com" <[thiltner@scmtd.com](mailto:thiltner@scmtd.com)>

Anyone interested in applying for the next ATP cycle – may want to participate in the workshop on the draft application:

**Friday, January 29, 2016**

**9:00 a.m. to 12:00 p.m.**

**Teleconference Number: 1-877-411-9748, Participant Code: 5283660**

*Caltrans Headquarters*

*1120 N Street, Room 2116*

*Sacramento*

Rachel Moriconi, SCCRTC

831-460-3203; fax 460-3215

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# California Department of Public Health's Suggestions for Active Transportation Program Cycle 3

January 27, 2016

The following are suggestions based upon CDPH's involvement with the Active Transportation Program (ATP) Technical Assistance Committee (TAC) as well as CDPH's work and service to the field.



- A. INCENTIVIZE NON-INFRASTRUCTURE (NI) ACTIVE TRANSPORTATION PROJECTS.** In order to incentivize NI active transportation work throughout California, CDPH proposes that an additional 5 points be awarded to Infrastructure projects that propose incorporating an NI component.
- There is precedent for awarding points for NI components in Infrastructure projects as demonstrated in Cycle 3 of the Federal Safe Routes to School Infrastructure application
  - Would ensure good coordination between Infrastructure and NI during proposal development process; coordination would benefit ATP
- B. EVALUATE APPLICATIONS BY PROJECT TYPE.** We propose that the 3 types of ATP proposals, Infrastructure, NI, and Plans, are evaluated separately from each other.
- C. REFINE EVALUATION PROCESS TO ENSURE BEST APPLICATIONS ARE SELECTED.**
- Evaluators should receive more in-depth training to ensure high quality and consistent application reviews
  - Review teams should comprise a minimum of 3 reviewers to promote fair judgment of application strengths and weaknesses
  - Applications should be reviewed by those who have expertise specific to NI, I, and Plans
- D. MAINTAIN POINTS AWARDED FOR DISADVANTAGED COMMUNITIES (DAC) FOR CYCLE 3.**
- Further analysis is needed to determine if points awarded for serving DAC in past cycles resulted in projects that truly benefitted these populations

**From:** [Theiss, Suzanne L@DOT](mailto:Theiss,Suzanne.L@DOT)  
**To:** [Waters, Laurie@DOT](mailto:Waters,Laurie@DOT)  
**Subject:** ATP Comments  
**Date:** Friday, January 29, 2016 12:26:51 PM

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Guideline suggestions, comments:

- For Sub-Section 13 page 8: Please state what the actual 80% statewide median is at the time of the call of projects. Otherwise you are depending on all applicants to determine this median, maybe inaccurately, when it would be simple to just state what it is.
- For Sub-Section 17 page 13: When the Regional Plan used in the application list specific projects, should the screening insure that the application matches the project cited from the plan?
- For Sub-Section 18 page 14: In this cycle, or next, a two tier scoring may be best. A few points for projects that are located on the cusp of a disadvantaged area. And the max points for projects that directly benefit a severe disadvantaged area.

When I review the applications submitted in my District, would it help for me to send comments to someone if I think the application doesn't meet the screening criteria? If so, who should I notify?

*Thanks, Suzi*

Suzanne Theiss, PE  
D1 District Local Assistance Engineer  
1656 Union Street, Eureka CA 95501  
(707) 445-6399 (wk) (707) 272-2157 (cell)  
[stheiss@dot.ca.gov](mailto:stheiss@dot.ca.gov)

**From:** [Borders, Heidi F@DOT](mailto:Borders,Heidi.F@DOT)  
**To:** [Waters, Laurie@DOT](mailto:Waters,Laurie@DOT); [Mcwilliam, Teresa Rs@DOT](mailto:Mcwilliam,Teresa.Rs@DOT)  
**Subject:** ATP Telecon Comments  
**Date:** Friday, January 29, 2016 12:21:21 PM

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For some reason my line was stuck in listen only mode.

For edits to Section VII Page 18. Un-strike removed sentence and add the word "not". If unallocated funding will not be available for other projects to use, it would be useful information for Coordinators and agencies to understand the ramifications of non-delivery. Funding will not just be lost to the agency but to the program as well.

For edits to Section VII Page 21. How does the contingency list work? If the contingency list is only in effect until the adoption of the next statewide program...the list will be abolished before the prior cycle has a chance to deliver to realize any savings that could be applied to the contingency list.

Thank you,  
Heidi Borders  
D5 Local Assistance  
805-542-4690

**From:** [Sara Fontanos](#)  
**To:** [Waters, Laurie@DOT](mailto:Waters.Laurie@DOT)  
**Cc:** [Brent Barnes](#); [Ray Espinosa](#); [Barbara Thompson](#); [Mary Gilbert](#); [Veronica Lezama](#)  
**Subject:** ATP Program Disadvantaged Community Definition \*San Benito County\*  
**Date:** Friday, January 29, 2016 12:08:33 PM  
**Importance:** High

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Good Afternoon Laurie,

Thank you for the workshop call today regarding the guidelines of the ATP. I look forward to the next workshop and letting potential partners know of our interest to work together to be more competitive.

Unfortunately I missed the opportunity to communicate this because of time limitations, so I am following up in email.

I want to emphasize the importance of maintaining that fourth option in the disadvantaged community section, as sought by the RCRC and others over the phone for the same reasons they mentioned. Recognizing the concern of one speaker that if everyone qualifies through the 4<sup>th</sup> bullet, then what is the point, I recommend a smaller group focus with members of the RCRC and other Counties like and the Administrators get together in between the workshops to develop criteria for the 4<sup>th</sup> option that will ensure the following: 1) the goals of the program are met and 2) those submitting through this 4<sup>th</sup> option can be compared and evaluated more easily and fairly in relation to program goals while being more inclusive the rural counties who are often missed with such strict criteria.

Please do not limit are eligibility by removing the fourth option under the Disadvantaged Community Section.

Respectfully,

*Sara Fontanos*

County of San Benito  
Administrative Office  
481 4th Street  
Hollister, CA 95023  
831-636-4000, x18  
[www.sbcparcs.org](http://www.sbcparcs.org)

**From:** [Ellen Barton](#)  
**To:** [Waters, Laurie@DOT](mailto:Waters.Laurie@DOT)  
**Subject:** Comments from ATP workshop  
**Date:** Friday, January 29, 2016 2:42:13 PM

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Thank you for the good discussion at the workshop today on Cycle 3 guidelines and proposed changes.

Here are some comments from San Mateo County

1. Regarding the section VII subsection 26 Caltrans review: ensure that the change clarifies whether the Caltrans review is the responsibility of the applicant to do before submission (and with whom) or if this review will take place after scoring of projects. Ensure that the change clarifies whether the Caltrans review will allow for the applicant to work with Caltrans to modify the scope to address their concerns, and how that process might work.
2. Under Section III, Eligibility, subsection 10: it would be helpful to clarify that the nonprofit that partners with an eligible applicant is not guaranteed to get the funds, that the eligible applicant must award the funds through competitive process. It would also be helpful to clarify that this type of partnership is not applicable to anything except the recreational trails category. Section 9 states this, but section 10 seems to be more broad and an applicant could assume that a nonprofit PTA, for example, partnering with a city on a non-infrastructure SRS program, would qualify under the Section 10 guidelines.
3. Section IV, subsection 17: Screening Criteria: I am glad this section is being revised, as many applicants added extraneous information here because the previous wording was unclear. I would suggest adding a word count target or maximum, to make it clear this section is not requiring great detail. It may be worth making this section a multiple choice or check-box answer.
4. I agree with the comments that "Evaluation" should be specifically included as an eligible project type. There is not enough effective, statistically-relevant evaluation being done especially on construction projects.
5. Under subsection 18, bullet "benefit to disadvantaged communities": From the perspective of San Mateo County, reducing the point score for disadvantaged communities would benefit most of the jurisdictions in this county, several of which did not apply due to the impossibility of this item. Trends and fashions in wealthy jurisdictions influence behaviors in all other jurisdictions: sometimes parents with high income face high barriers to active trips.
6. Under the same subsection, bullet "cost-effectiveness": there may need to be clarification whether a prior non-infrastructure project award would give greater points to a subsequent application.

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**From:** Laurie@DOT Waters [mailto:[laurie.waters@dot.ca.gov](mailto:laurie.waters@dot.ca.gov)]  
**Sent:** Thursday, January 28, 2016 3:00 PM  
**To:** Ellen Barton <[ebarton@smcgov.org](mailto:ebarton@smcgov.org)>  
**Subject:** 2017 ATP Workshop Documents

ATP Stakeholders,

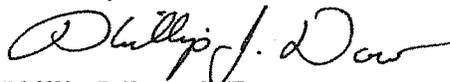


Changes in the Disadvantaged Communities section of the Active Transportation Program guidelines which I strongly support are:

- Adding language to permit the consideration of **potential** for reduction in the number or rate of pedestrian and/or bicycle fatalities and injuries. This is important in rural areas to make the case for safety improvements in areas where low population or usage fails to highlight safety issues due to lower levels of use. There are frequently “accidents waiting to happen” in rural areas that are often not identified through the use of safety indicators based on accident frequency.
- Adding language to qualify for an additional five points if the project will result in construction of an ATP project that was previously awarded ATP funding for pre-construction activities. This will help ensure that projects that were previously awarded funding will likely be successful in a subsequent cycle and overcome guideline changes or variations in scoring by evaluators. It will protect State investment as well as project sponsor investment in the project. An MCOG project was split between Cycle 1 and Cycle 2 because of concern over environmental phase completion in a timely manner. Fortunately Phase 2 was funded, but the scored point level was only 1 point above the funding cutoff. A couple of points lower and there would have been a dilemma to resolve.
- Scaling of the three qualifying criteria under the Disadvantaged Communities Narrative Question to recognize various degrees of severity in the scoring process. This will provide point separation within this narrative question and lower overall scoring. The most disadvantaged communities with proposed projects that most clearly benefit these communities will receive the most points. Less severely impacted communities with proposed projects with a lesser focus on the disadvantaged community will be scored more modestly. With lower overall points awarded under this application section, the door will open for worthy projects in non-disadvantaged communities.

Thank you for considering these comments. I look forward to the Commission’s consideration of recommended changes to the ATP guidelines for 2017. It involved input of hundreds of people from throughout California, sometimes with disparate points of view. Throughout this process, Commission staff did a commendable job of presenting issues, drawing parameters for discussion, eliciting comments, filtering, and finding common ground.

Sincerely,



Phillip J. Dow, P.E.  
Executive Director

February 1

Cc: Dan Gjerde, MCOG Chair

Phil Dow

## Proposal for Benefit to Disadvantaged Communities (Narrative Question #5)

- It is understood that perhaps the current structure weighs too heavily on Disadvantaged Community status in the ATP program so that it is very difficult to obtain enough points in the Statewide competition to get funded unless the project is within a Disadvantaged Community.
- I am strongly supportive of retaining the possibility of earning 10 points in this category. I think this issue could be addressed by increasing the difficulty of obtaining points; thereby ensuring that only projects in the most severely disadvantaged communities can obtain maximum points.
- I heard others speak in the January 29 workshop regarding their view that household income is the most prevalent and widespread indicator of disadvantaged communities. Therefore I am opposed to the suggestion that maximum points should be awarded to projects that meet all three criteria. North Coast, mountain, and foothill counties would be eliminated due to poor performance in CalEnviroScreen even though many such areas report household incomes far below the 80% threshold.
- If the intent of adjusting the impact of Question 5 as a determinant of scoring, then I suggest we keep the current thresholds for determining qualification as a Disadvantaged Community intact. If just minimum standards are met, then the most points that can be obtained would be 5 points. This would be from the recommended 2 points possible for percentage of funds expended in the disadvantaged community and the 3 points possible for fulfilling important needs in the Disadvantaged Community.
- Additional points could be obtained depending on how much the community **exceeds the threshold**. The attached spreadsheet depicts how scoring could be stratified according to severity. A methodology such as this would ensure that only good projects in very disadvantaged communities get the full 10 points, opening the door for good projects in non-disadvantaged communities to be competitive. This applies especially to those good projects in more affluent communities that are able to apply significant matching funds to the mix. Most projects in disadvantaged communities are unlikely to score well under Narrative Question 7.
- My previous comments regarding this issue indicated that perhaps tightening the guidelines to ensure only projects that provide **Direct Benefit**, as suggested by Commissioner Burke, may be the way to approach this issue. After listening to the discussion at the January 29 workshop, I believe that stratification of points by severity may be a more equitable solution. In this manner, few projects will receive the entire 10 points, but we can be assured they are in very disadvantaged areas. On the other hand, barely qualifying as a DAC ensures no points unless the applicant adequately addresses the percent of funds to be expended in the DAC and how the project fulfills a need in the community.

Phil Dow, MCOG

2/1/16

## Part B: Narrative Question #5

### Identification of Disadvantaged Communities: 0 to 5 points

Option 1: Median household income, by census tract for the community (ies) benefited by the project:

Minimum to qualify under Question #5 is 80% of statewide household income.

Percentage	Points
>75-80%	0
>70-75%	1
>65-70%	2
>60-65%	3
>55-60%	4
< or = 55%	5

Option 2: California Communities Environmental Health Screening Tool 2.0 (CalEnviroScreen) score for the community benefited by the project.

Minimum to qualify is attainment of Top 25% of DAC per CalEnviroScreen

Percentage	Points
>23-25%	0
>21-23%	1
>19-21%	2
>17 -19%	3
>15-17%	4
< or = 15%	5

Option 3: Percentage of students eligible for Free or Reduced Price Meals Program:

Minimum to qualify is 75%

Percentage	Points
>75 -78%	0
>78 -81%	1
>81 - 84%	2
>84 -87%	3
>87-90%	4
> 90%	5

Option 4: Alternative criteria for identifying disadvantaged communities:

No changes recommended. This permits agencies to make their case and is especially useful in rural areas where census tracts tend to be large.

**Date:** Feb. 1, 2016  
**To:** Laurie Waters, CTC  
**From:** Oona Smith, HCAOG  
**Re:** Revised Draft 2017 ATP Guidelines

CONTENT:

**VIII. Roles and Responsibilities**

Might the TARC's roles and responsibilities be informative here? (Although already under Project Type Requirements [subsection 13, pg. 9].)

**Subsection 19. Project Selection between Project Application with the Same Score:** (pg. 15)

**If two or more projects applications receive the same score that is the funding cut-off score, the following criteria will be used to determine which project(s) will be funded:**

- **Construction readiness and** – What alternative criterion might be considered for non-infrastructure or plan projects? Or, is the purpose to prefer infrastructure projects over NI and plans?
- **Highest score on Question 1 and**
- **Highest score on Question 2**

MINOR EDITS/TYPOS:

**pg. 4, subsection 7:**

(1<sup>st</sup> sentence) ...community-wide active transportation plans

(3<sup>rd</sup> paragraph) – reiterate that this funding is available for DACs (only). For example,

The first priority for the funding of plans will be for cities, counties, county transportation commissions, regional transportation planning agencies, MPOs, school districts, or transit districts in a disadvantaged community that have neither a bicycle plan, a pedestrian plan, a safe routes to schools plan, nor a comprehensive active transportation plan. The second priority for the funding of plans will be for a disadvantaged community(ies) in cities, counties, county transportation commissions, regional transportation planning agencies, or MPOs that have a ...

**pg. 5, subsection 9:**

2nd-to-last bullet: [typo]

Private nonprofit tax-exempt organizations may apply for projects eligible for Recreational Trail Program funds for? recreational trails and trailheads,...

**pg. 9, subsection 13-E:**

Does this refer to plans that ATP will fund, or plans in general? If this it is what ATP will fund, add that only disadvantage communities are eligible for such funding.

**E. Active Transportation Plan**

A city, county, county transportation commission, regional transportation planning agency, MPO, school district, or transit district may prepare an active transportation plan (bicycle, pedestrian, safe-routes-to-school, or comprehensive). ...

An active transportation plan must include, but need not be limited to, the following components or explain why the component is not applicable:

**pg. 12, subsection 15:**

Projects not selected for programming in the statewide competition must be considered in the large MPO-run competitions or the state-run Small Urban and Rural competitions.

**pg. 18, section VI:**

**Any scope changes must be presented to Caltrans for consideration prior to allocation. Caltrans will ~~make a recommendation of approval or denial~~ to the Commission for final approval. Scope changes that result in a decrease of active transportation benefits may result in removal removing the entire project from the program.**

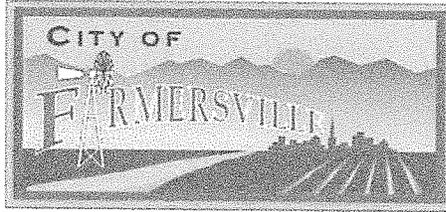
**pg. 21, subsection 26:**

(first bullet) Is this to mean “that is to say” (i.e.), or “for example” (e.g.)?

- Provide statewide program and procedural guidance (i.e. provide project evaluation of materials and instructions), conduct outreach through various networks such as, but not

**pg. 22, subsection 26:**

(last bullet before subsection 27) – Capitalize technical assistance resource center



February 2, 2016

*(transmission via email)*

Will Kempton  
Executive Director  
California Transportation Commission  
1120 N Street, MS-52  
Sacramento, CA 95814

Subject: Draft Guidelines Scoring Criteria Active Transportation Program (ATP) Cycle 3

Dear Director Kempton:

I am writing regarding concerns relating to the proposed scoring criteria set out in the draft guidelines for the Active Transportation Program Cycle 3. The Cost-effectiveness and Construction Readiness provides for 10 points to projects which have completed environmental clearance (both CEQA and NEPA) and final design. This level of pre-construction investment presents a significant financial barrier for a community like Farmersville.

Farmersville (population 10,777) is a severely disadvantaged community. Median household income in our City is \$32,384, 53% of the statewide average of (\$61,094.) Approximately one third of our population (28.7%) is living below the poverty line and we have a high rate of unemployment (19.3%). Given our small population and low-income status of most residents, revenue streams are limited to support necessary infrastructure improvements. The City does not have funds available to complete costly pre-construction tasks, particularly for a project that may or may not receive implementation funds in a highly-competitive grant cycle.

Farmersville's Cycle 2 application to ATP was for an important Safe Routes to Schools project that will provide sidewalks and bicycle lanes on the main roadway leading to our multi-school campus. Our application scored well (83 points) but, fell short of the funding cut-off in the Statewide competition. We are eager to submit our project for consideration in Cycle 3 but, are concerned that the construction-readiness scoring criteria will diminish our chances for funding. ATP funding is critical for disadvantaged communities, like Farmersville. Requiring this level of project readiness for the maximum scoring on this section, presents a significant challenge for us. Without grant funding, our infrastructure project cannot be implemented.

Our city leaders urge you and your staff to reconsider the project-readiness criteria scoring so that disadvantaged communities will have equal footing to compete for ATP funding.

Sincerely,

A handwritten signature in black ink, appearing to read "John Jansons", is written over a light-colored background.

John Jansons  
City Manager

Cc: Laurie Waters, CTC Associate Deputy Director

**ACTIVE TRANSPORTATION PROGRAM  
CYCLE 3**

**NARRATIVE QUESTIONS**

Suggestions for Revisions by ATP TAC NIN Sub-Committee  
Feb. 2<sup>nd</sup>, 2016

**1. (5 pts) Overall Active Transportation Project Description**

Describe overall project/plan description; your agency's qualifications and why you are capable of making these improvements; describe how the program will be sustained;

**2. (30 pts) – Transportation Mode Shift**

- **Desired increase in walking and biking – especially in students;**
- **Identification of walking/biking routes --improvement of connectivity/mobility.**

*A. The Problem.* Describe your community and the challenges it faces in relation to increasing active transportation rates. Describe current challenges to connectivity to community hubs and ease of mobility in your community. Include mode data -- current student mode data; any local sources of community mode data; any local bike/pedestrian counts in project area;

*B. Project Description.* Describe your strategies for increasing walking and biking (especially for students), for identifying routes for pedestrians and cyclists and demonstrate how the project will improve or affect connectivity/mobility in your community.

*IN: How many bikes/peds currently use area of interest. How many more are expected to use this area. Defend projections and explain methodology.*

*PLAN: How will plan specifically target increased bike/ped usage?*

*NIN: Include school enrollment numbers if a SRTS project. Show how previous programs increased usage. Demonstrate how program will affect bike/ped behavior.*

3. (25 pts) -- Safety

- **Reduction in bicyclist and pedestrian injury/fatality.**

A. *The Problem.* Describe current active transportation safety conditions in your project area. Provide baseline crash data from SWTRS, TIMS, OTS and any local sources.

B. *Project Description.* How will your project/plan improve bike/ped safety in your area?

*IN: Identify countermeasures included in project that will address type of collisions reported at the project area. Describe how your project will reduce speed or volume of motor vehicles, improve sight distance and visibility, Improve compliance with local traffic laws, Eliminate behaviors that lead to collision, Address inadequate traffic control devices, bicycle facilities, crosswalks or sidewalks.*

*PLAN: Plans should have systematic method for identifying safety hazards. Describe hazards and how plan will mitigate against them or countermeasures that will be implemented.*

*NIN: Describe how the program educates and encourages safe behavior amongst all road users.*

4.

(10 pts) – Public Health

- **Improvement in public health – especially in students;**

A. *The Problem.* Describe your community's health challenges as they relate to active transportation. These can include statistics on obesity, asthma factors and general air quality.

B. *Project Description.* Describe how your program/plan will address and improve these health challenges.

*IN/PLAN/NIN: Utilize public health data available from your local health department. Demonstrate how positive health outcomes will result from your project/plan.*

**4. (5 pts) – Disadvantaged Communities**

- **Service of low-income communities and otherwise defined 'disadvantaged communities';**

*A. The Problem.* Is your community considered 'disadvantaged' based on the criteria listed below? If so, what percentage of your plan/project will benefit this community?

*B. Project Description.* Describe how your program/plan will address the needs of the project area's 'disadvantaged community'?

*IN/PLAN/NIN: Utilize options 1 through 4 to demonstrate disadvantage community status. Describe how your project/plan will specifically impact a low income population.*

**5. (15 pts) – Public Participation**

- **Providing projects that have public support and endorsement**

A. Describe in detail and provide documentation indicating how the community was involved in selecting projects or if a plan, how process will involve the public. Who was involved in identifying the selected projects? Describe the feedback and plan for future engagement with the public throughout the project.

**6. (10 pts) – Cost Effectiveness**

- **Providing projects that use public funding efficiently and weighs the relative costs and outcomes (effects) of two or more alternatives.**

*A. Describe the other considered alternatives and show how the cost/outcomes were related. Why does your project have the best cost/outcome ratio?*

**7. (5 pts) – Leveraging Non-ATP Funds**

- **Projects with demonstrated funding score higher**

**From:** [Victoria Cacciatore](#)  
**To:** [Waters, Laurie@DOT](mailto:Waters.Laurie@DOT)  
**Subject:** comment from today's workshop  
**Date:** Wednesday, February 03, 2016 3:56:25 PM

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Hi Laurie,

Stephen didn't read my comment off and I wanted to make sure it was part of the ongoing conversation as you revise the Guidelines:

In favor of 0-5 points (instead of 0-10) and scaling those available points:  
decreasing the DAC allows more of a focus on project performance and benefits instead of location, which would better help the ATP achieve goals such as increasing biking & walking, increasing safety, and reducing greenhouse gas emissions. Additionally, DAC status is not a guaranteed indicator that the community wants or needs the project, yet it is being used to award finite active transportation dollars.

Talk to you soon,  
Victoria

**From:** [Benjamin Giuliani](#)  
**To:** [Waters, Laurie@DOT](mailto:Waters.Laurie@DOT)  
**Cc:** [Gabriel Gutierrez](#)  
**Subject:** Disadvantaged scoring  
**Date:** Thursday, February 04, 2016 9:01:02 AM

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Hi Laurie

First of all, I don't envy your task. These phone calls are like herding cats. Thank you for your patience.

This isn't an official response from TCAG, I'm just throwing this out there since it sounded like you haven't received too many specific suggestions yet:

1 pt for qualifying as disadvantaged for any one option out of options 1-4

4 pts for qualifying as severely disadvantaged under 2 of the first 3 options. For example, a non-SRTS project would have to show both 60% income and 10% enviro screen. A SRTS project could show 60% income and 90% school lunch program or 10% enviro screen and 90% school lunch program. I liked the suggestion on the last call that if an applicant has to resort to option 4 then the severely disadvantaged points would not apply.

2 pts max for project location in a disadvantaged community (keep existing question in draft questionnaire)

3 pts max for showing direct and meaningful benefit (keep existing question in draft questionnaire)

A disadvantaged project would have a max of 6 points and a severely disadvantaged project would have a max of 10 points.

Regards  
Ben



February 5, 2016

Laurie Waters, Associate Deputy Director  
California Transportation Commission  
1120 N Street, MS-52  
Sacramento, CA 95814  
[laurie.waters@dot.ca.gov](mailto:laurie.waters@dot.ca.gov)

**VIA E-MAIL**

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

Dear Ms. Waters,

On behalf of the undersigned 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, active travel--especially for disadvantaged communities, schools, and residents. Below, we outline several recommendations to strengthen the program to maximize the benefits of the program for all Californians:

**Recommendation 1: Adjust Disadvantaged Communities Definitions to Include 'Severely Disadvantaged' Tiered Category**

This recommendation builds on the existing definitions for disadvantaged communities in the ATP Guidelines, but for each of the current definitions we recommend awarding points based on two lower thresholds that represent deeper levels of disadvantage. Creating an additional tier of disadvantage severity enables the CTC to ensure even greater competitiveness for the highest-needs communities in the state.

For the statewide median household income (MHI) disadvantaged community (DAC) metric, we recommend allowing unincorporated communities to utilize the Census Designated Place (CDP) geography for their MHI data in lieu of Census tract data, while communities with population under 15,000 should be allowed to use Census block groups for MHI data. This would address most concerns from smaller communities that their low-income status is obscured by higher income communities in the same Census tract. We **recommend establishing <60% statewide MHI as the threshold for severely disadvantaged.**

We **recommend retaining the CalEnviroScreen (CES) 2.0 Top 25%** as a DAC metric. One of the primary goals of the program is to reduce greenhouse gas emissions through investments in active transportation, and the CES metric aligns with the Senate Bill 535 requirements for Greenhouse Gas Reduction Fund (GGRF) Programs. The initial intent of the Brown Administration in creating the ATP was to increase funding for the program in future years, at least in part with GGRF monies. As a severely oversubscribed program, the Program's use of CES should be maintained to ensure eligibility for receiving additional monies through the GGRF. We **recommend establishing CES top 15% as the threshold for severely disadvantaged.**

We **strongly recommend revising the Free or Reduced-Price Meals (FRPM) DAC criteria to be restricted solely to Safe Routes to Schools projects.** In the past two cycles, our collective experience as evaluators strongly indicates that many applicants are not providing adequate justification for how the FRPM metric is representative of their community, yet are awarded full points. In other instances, we've seen applicants use this metric, yet neglect to describe the benefits provided to the school populations cited in their applications. To close this loophole, we strongly urge you to limit the use of the FRPM to only Safe Routes to School projects (including Safe Routes to bus stops projects in rural areas). We also **recommend establishing >85% FRPM participation as the threshold of severely disadvantaged.**

For the fourth DAC metric, we strongly recommend the adoption of additional safeguards to prevent abuse of this option. The original intent of this option has always been to allow for data-poor communities whose DAC status may be obscured by the large-scale nature of data sets to provide localized quantitative or qualitative data to make their case. Data aggregated at the Census tract or block group level can, at times, be inaccurate for small unincorporated communities (i.e. the combination of data from a small low-income neighborhood with data from a nearby higher-income community can mask small, concentrated pockets of poverty). Consequently, some small communities have collected their own data through quantitative neighborhood-level surveys. This option has never been meant to be a free for all for applicants to stretch the truth.

Accordingly, the **Guidelines should limit the use of this option only when there is concern about accuracy of the publicly available data and only by small unincorporated communities.** This practice is already being used in a number of State infrastructure programs, in particular in the State Drinking Water and Clean Water Revolving Fund. The CTC should provide clear and unambiguous training to evaluators in order to properly evaluate projects using this option. Alternatively, all projects utilizing this option could be pre-screened by CTC staff for a determination of DAC status. Additionally, we **recommend the Guidelines to explicitly allow for the consideration of regionally-identified “disadvantaged communities” by an MPO or RTPA** in an adopted Regional Transportation Plan in accordance with federal Title VI requirements. We suggest the following safeguards be added to limit abuse of this option:

“If a project applicant believes a project benefits a disadvantaged community but the project does not meet the aforementioned criteria due to a lack of accurate Census data or CalEnviroScreen data that represents a small neighborhood or unincorporated area, the applicant must submit for consideration a quantitative assessment ~~of why the community should be considered disadvantaged, or how the project connects a disadvantaged community to outside resources or amenities,~~ such as a neighborhood-level survey, to demonstrate that the community’s median household income is at or below 80% of the state median household income.

Regional definitions of disadvantaged communities as adopted in a Regional Transportation Plan (RTP) by an MPO or RTPA per obligations with Title VI of the Federal Civil Rights Act of 1964, such as “environmental justice communities” or “communities of concern,” may be used in lieu of the options identified above.”

**Recommendation 2: Retain Full 10 Points for Disadvantaged Communities, Focus on Direct Benefits, & Employ Tiered Scoring Approach for Severely Disadvantaged Communities, & We strongly urge the CTC to retain the full 10 points for the disadvantaged communities section while tightening up the requirements to qualify and providing more points for the most severely disadvantaged communities in the state. Providing dedicated points to disadvantaged communities helps these communities overcome the difficulties presented by lack of matching funds and/or funds to develop, adopt, and implement plans. We believe that by employing a tiered scoring approach for the DAC section will limit opportunities for abuse and stretching the truth. In line with Commissioner Burke’s direction, we strongly recommend that ALL projects seeking DAC points be required to demonstrate how it provides a direct benefit as a threshold in order to receive any “located within” points. We propose the following breakdown for 10 DAC points:**

- **Threshold Requirement: Project must provide at least one (1) substantiated direct benefit to DAC residents in order to receive any DAC points.**

- 3 points for direct project benefits for disadvantaged residents, with a maximum of 2 points for projects providing a direct, assured, and meaningful benefit to a disadvantaged community and a maximum of 3 points for projects providing a direct, assured, and meaningful benefit to a severely disadvantaged community;
- 7 points maximum for a project being physically located within a DAC with more points awarded to the severely disadvantaged thresholds we recommend above.

For a project to provide any DAC points, it must demonstrate how it provides at least one (1) a direct, meaningful, and assured benefit (examples further described below). For projects serving disadvantaged communities, applicants should be awarded 1 point for providing two (2) or more direct benefits and 2 points for providing three (3) or more. For projects serving severely disadvantaged communities, applicants should be awarded 2 points for providing two (2) or more direct benefits and 3 points for providing three (3) or more. For projects serving both disadvantaged and severely disadvantaged communities, scoring will be based on the tier (disadvantaged v. severely disadvantaged) in which 51% or more of the project's location or services are rendered.

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 pose safety and health hazards to DAC residents (i.e. 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 competent 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

For scoring a project's location within a DAC, we propose using the following tiered scoring system up to a maximum of 7 points, wherein projects that are located within severely disadvantaged communities would receive more points. Projects that cross the boundaries of multiple census tracts or serve multiple schools might receive partial points for each part of the project, based on the percentage of the project in each tract. Because it is difficult to justify how a project with less than 10% of its length or services truly provides a direct as opposed to indirect benefit, we **recommend establishing a minimum of 10% of a project's length or services to be located in/provided to a DAC in order to receive any points for being "located within."**

	DAC Criteria	
% Project Located within DAC	Disadvantaged: <80% MHI; or Top 25% CES; or >75% FRPM (SRTS Only)	Severely Disadvantaged: <60% MHI; or Top 15% CES; or >85% FRPM (SRTS Only)
10-24%	0.5 point	2 points
25-49%	1 point	3 points
50-74%	2 points	5 points
75-100%	4 points	7 points

To illustrate how this scoring would work in practice, we offer the following examples:

	DAC Criteria			
	Disadvantaged: <80% MHI; or Top 25% CES; or >75% FRPM (SRTS Only)	Severely Disadvantaged: <60% MHI; or Top 15% CES; or >85% FRPM (SRTS Only)	Non-Disadvantaged Community	Total Score
<b>Example 1</b>	50% of project	25% of project	25% of project	5
<b>Example 2</b>	25% of project	25% of project	50% of project	4
<b>Example 3</b>	25% of project	50% of project	25% of project	6
<b>Example 4</b>	25% of project	75% of project	0% of project	7
<b>Example 5</b>	75% of project	25% of project	0% of project	7
<b>Example 6</b>	99% of project	1% of project	0% of project	4
<b>Example 7</b>	30% of project	0% of project	70% of project	1
<b>Example 8</b>	30% of project	10% of project	60% of project	3
<b>Example 9</b>	80% of project	10% of project	10% of project	6
<b>Example 10</b>	60% of project	20% of project	20% of project	4

Lastly, applicants should be required to use the same metric in evaluating DAC status for all Census tracts/block groups/CDPs in the project area. For example, if a project crosses 5 Census tracts and the applicant wishes to qualify for DAC points, then the applicant must use either the statewide MHI of each Census tract/block group/CDP OR the CalEnviroScreen of each Census tract OR the FRPM participation for each Census tract (for Safe Routes to School projects only) OR the regional DAC designation in an adopted RTP for all Census tracts. In the first two cycles, we saw many applications that used one metric for some Census tracts and another for others, making evaluation difficult and the scoring of DAC points open to manipulation.

### **Recommendation 3: 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 pedestrian, bicycle, or combined bicycle/pedestrian master plan. Moreover, only 7.5% of jurisdictions have adopted a pedestrian master plan, and half of our ten largest cities in California lack a 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, and 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 higher ceilings or targets for planning in disadvantaged communities** in excess of state's 2% ceiling up to 5% of funds in a regional competition. Additionally, we recommend that the Guidelines clarify that all regional MPO programs should provide no less than 1% of their funds for planning in disadvantaged communities

Additionally, we strongly **recommend that the Guidelines and Application further emphasize that planning funds are reserved for disadvantaged communities**. Priority must be placed on jurisdiction-wide plans or Safe Routes to Schools plan where the entire community qualifies as a DAC or where the entire student population served is eligible for free or reduced priced meals. For plan applications from jurisdictions with a mix of community types or serving a mixed student body, priority must be placed on those jurisdictions that serve 50% or more DAC residents or for Safe Routes to School plans, where over 75% of students qualify for free and reduced price meal.

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.

Sincerely,

Jeanie Ward-Waller, Policy Director  
California Bicycle Coalition

Wendy Alfsen, Executive Director  
California Walks

Veronica Garibay & Phoebe Seaton, Co-Directors  
Leadership Counsel for Justice & Accountability

Angela Glover Blackwell President & CEO  
PolicyLink

Bill Sadler, Senior California Policy Manager  
Safe Routes to School National Partnership

CC:

Laurel Janssen, Deputy Director, California Transportation Commission,  
[laurel.janssen@dot.ca.gov](mailto:laurel.janssen@dot.ca.gov)

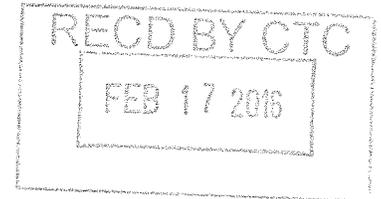
April Nitsos, Chief, Office of Active Transportation and Special Programs, Division of Local Assistance, Caltrans, [april.nitsos@dot.ca.gov](mailto:april.nitsos@dot.ca.gov)



City of Anaheim  
**DEPARTMENT OF PUBLIC WORKS**

February 8, 2016

**Caltrans**  
Malcolm Dougherty, Director  
Kome Ajise, Chief Deputy Director  
P.O. Box 942873  
Sacramento, CA 94273-0001



**California Transportation Commission**  
Lucetta Dunn, Chair  
Will Kempton, Executive Director  
1120 N Street, MS-52  
Sacramento, CA 95814

RE: Recommendations for ATP Cycle 3 Application Cycle

Dear Mr. Dougherty, Mr. Ajise, Ms. Dunn, and Mr. Kempton:

As your agencies begin preparing application materials for Cycle 3 of the Active Transportation Program (ATP), I thought I would share a few recommendations from the Cycle 2 application process. My hope is that some of these suggestions might make the process easier for applicants and reviewers alike.

Cycle 2 applicants had to flip between 5 documents to find the needed information, including: 1) the "Caltrans Local Assistance Program Guidelines, Chapter 22;" 2) the "Active Transportation Program Guidelines;" 3) the "Application Instructions and Guidance for ATP Cycle 2;" 4) the "Active Transportation Program, Cycle 2, Instructions and Guidance for Part B and C Only;" and 5) the "ATP Eligible Non-Infrastructure Activities Document." *One document incorporating all of the key information from these resources would reduce the staff time required.*

Cycle 2 applications required more than 100 hours of staff and consultant time to complete, including applications that were not selected for funding. Perhaps instituting a two-phase application process would be the best way to reduce this burden. During Phase 1, applicants would complete a shorter competitive application. Those recommended for funding could then move on to Phase 2, where they would complete the more administrative tasks and forms. Resources could also be saved by reducing some of hard copy delivery requirements which ran approximately \$1,000.

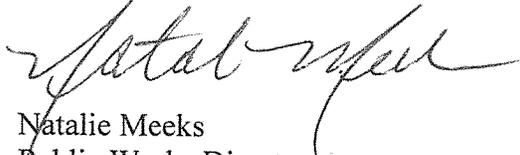
Additionally, I recommend evaluating the scoring process to insure consistency. In Cycle 1, all of our applications ranking very high and were selected for funding. In Cycle 2, our projects and our applications were very similar, however the scores were much lower, and only one was ultimately selected for funding.

Re: Recommendations for ATP Cycle 3 Application Cycle  
February 8, 2016  
Page 2 of 2

In addition, the three applications we submitted in Cycle 2 were very similar to each other (some portions were nearly identical), and yet the scores varied significantly. The process should be reviewed for any ambiguities in the evaluation process and/or directions to evaluators on how to assign points.

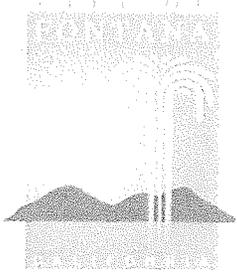
The City of Anaheim would be happy to participate in an application and process review. We look forward to the opportunity to apply for funding again this spring, and thank you in advance for considering our suggestions.

Sincerely,

A handwritten signature in black ink, appearing to read "Natalie Meeks", written in a cursive style.

Natalie Meeks  
Public Works Director  
City of Anaheim

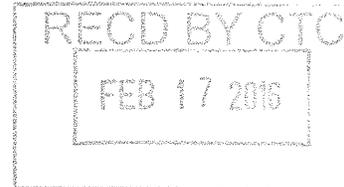
haurle



City of Fontana  
CALIFORNIA

February 10, 2016

Malcolm Dougherty, Director  
Kome Ajise, Chief Deputy Director  
Caltrans  
P.O. Box 942873  
Sacramento, CA 94273-0001



Lucetta Dunn, Chair  
Will Kempton, Executive Director  
California Transportation Commission  
1120 N Street, MS-52  
Sacramento, CA 95814

RE: Suggestions for Improving/Streamlining the ATP 3 Application Process

To: Mr. Dougherty, Mr. Ajise, Ms. Dunn, and Mr. Kempton:

On behalf of the City of Fontana, I am excited to hear Cycle 3 of ATP funding may be forthcoming. Our City relies heavily on grant funding to undertake projects that go beyond simple maintenance, and involve state-of-the-art technology or practices to ensure safety of our residents. Encouraging active transportation is especially important to our City, as we diligently promote the efforts of our Healthy Fontana Initiative.

My concerns during Cycle 2 are primarily related to the burden placed on cities at the time of the initial application. Like many cities, Fontana has faced extreme budget cuts in recent years, resulting in smaller, overburdened staff. Funding for external consultants are also scarce. Both of these limited resources were overtaxed during Cycle 2. To streamline the process, I would recommend two key actions:

1. Create one document that can serve as the guidance for ATP. In Cycle 2, there were five (5) different documents our staff had to reference regularly. Just finding the right document to reference was time consuming.
2. Create a two-phase application process. If our application is going to be competitive, that could seemingly be determined with very little documentation or forms. Limiting the application in phase 1 to the details that are critical for making a short list of competitive application, and saving the administrative forms for phase 2 applicants would be a welcome change by all applicants, and probably by reviewers as well. This would also help to cut down tremendously on production costs, which became burdensome (color copies, tabs and bindings meant printing bills near \$1,000).



In addition to suggestions on the application, I would also recommend revisiting the review process and evaluation criteria, to ensure evaluators clearly understand how to assign points. The variance in scoring on our Cycle 1 and Cycle 2 was surprising. It is challenging to write a successful application if all reviewers are not stringently using the same rubric to evaluate them.

I hope these recommendations are useful to you as you begin preparing for Cycle 3. I am grateful for the opportunity to express these concerns to you. Should you have any questions, please contact Noel Castillo, Engineering Manager at (909) 350-7632.

Sincerely,  
Department of Engineering

A handwritten signature in black ink, appearing to read 'Ricardo Sandoval', written in a cursive style.

Ricardo Sandoval  
Director of Engineering/City Engineer

ATP Cycle 3 Comments

**General/Policy Comments**

Page	Section	Comment
1, 2		Support delay release of Cycle 3 to 2017 or 2018. Allows more time for agencies to complete Cycle 1 and 2 projects and prepare for future Cycle 3.
4		Support increasing planning set aside from 2% to 5% in the statewide call. The limitation of Plans at 2% of funding limits creation of future projects given the high demand for funding plans during the prior two cycles.
N/A	N/A	Need to include Federal Finance letter in the documents/LAPG/LAPM specific to ATP.
N/A	N/A	<p>CTC and Caltrans need to create a solution to address Federal Transportation Improvement Program (FTIP) Transportation Control Measures (TCM) committed projects. Most ATP projects are TCM committed, requiring applicant agencies to deliver the project within a time frame. If a project is cancelled or delayed, the Regional Transportation Planning Agencies (RTPA) are responsible to replace the cancelled project with a project that provides similar benefits.</p> <p>The RTPAs should not be responsible for delivery and replacement of cancelled or delayed ATP TCM projects that are out of RTPAs control. FTIP programming tools such as the Expedited Project Selection Process (EPSP) should be allowed, which would allow the Metropolitan Planning Organization (MPO) to program funds in a later year in the FTIP than what is programmed through the CTC action.</p>
N/A	N/A	Support including traffic signals specific to a bike boulevard project as an eligible project. The signal should not be limited to satisfying traffic signal warrants.

**Guideline Comments**

Page	Section	Comment
6	11	Support allowing all agencies to apply for planning funds. Do not limit planning funds to disadvantaged communities.
9	13	Section B states "For a project to contribute toward the Safe Routes to School funding requirement..." Review if the mention of a "funding requirement" is legacy text from Cycle 1 which included a minimum distribution of funds

		towards SRTS projects, but was eliminated in Cycle 2 and doesn't appear in Cycle 3 Guidelines.
11	14	Support deletion of requirement that hard copies of the application be submitted given the considerable expense and difficulty. Additionally, digital submittals have been deemed acceptable for other similar grant programs such as the Caltrans Sustainable Transportation Planning Grant Program and the Office of Traffic Safety Grant Program.
14	18	Support the change from 10 to 5 points under the Disadvantaged Communities question.
15	20	To improve scoring consistency and avoid perceived bias; modify the project evaluation committee to include more than 2 reviewers. Local jurisdictions have provided input that the limited number of reviewers seem to provide varying scoring results when comparing projects that applied for both Cycle 1 & 2 funding calls.

#### Application Comments

Page	Section	Comment
2	Part B	Include short description of project/project summary.
7	Part B, 5	Support CTC proposal to reduce Question 5 Benefit to Disadvantaged Communities from 10 to five points. Many agencies are adversely affected by the disadvantaged community requirement, which discourages agencies from applying for funds.  Legislatively, only 25% percent need to go towards disadvantaged communities. The previous cycles included 80%+ of projects in disadvantaged communities.
9	Part A, 6	Given that Question 6 item C is now deleted, modify Item A to include direction that the applicant must use the Caltrans provided B/C Tool.
9	Part B, 6	Provide mechanism to evaluate "readiness" for Eligible Projects categories Plans and Non-Infrastructure Project.
9	Part B, 6	Consider adding CEQA/NEPA together as one category.  Most projects will not have NEPA completed before applying, and some projects will be state only funded.
13	Part C	Provide a matrix illustrating which of the documents/exhibits/attachments are required for each eligible project type to avoid confusion during application submittal. A table would include the Attachment item as rows, and the Eligible Project as columns, with a check mark indicating inclusion is needed.
13	Part C	Modify detail on Attachment G to indicate a cost estimate should be provided for all eligible projects to help evaluate

		the scope/fee of the proposed project is realistic and feasible.
13	Part C	Define "Non-Infrastructure Elements", and clarify if Plans that conduct public engagement and other activities may require completion of Attached H (Form 22-R).

**ACTIVE TRANSPORTATION PROGRAM  
CYCLE 3**

**NARRATIVE QUESTIONS**

Suggestions for Revisions

Jeanne LePage - Ecology Action

Feb. 10th, 2016

**1. (1 pt) Overall Active Transportation Project Description**

Describe overall project/plan description; agency qualifications and why this agency and staff are capable of making these improvements; describe how the program will be sustained.

**2. (3 pts) Non-Infrastructure and/or Planning Solutions**

Does this project have a non-infrastructure (NIN) or planning component? If so, briefly describe what it is. (Projects will receive 3 points if they are NIN or planning stand alone projects or contain NIN or planning components).

**3. (30 pts) – Active Transportation Mode Shift Goals**

- **Desired increase in walking and biking – especially in students;**
- **Identification of walking/biking routes --improvement of connectivity/mobility.**

*A. The Problem.* Describe the community and the challenges it faces in relation to increasing active transportation rates. Describe current challenges to connectivity to community hubs and ease of mobility in community. Include data -- current student mode data; any local sources of community mode data; any local bike/pedestrian counts in project area – to support description.

*B. Solution.* Describe strategies for increasing walking and biking (especially for students), for identifying routes for pedestrians and cyclists and demonstrate how the project will improve or affect connectivity/mobility in this community.

*IN: How many bicyclists/pedestrians currently use area of interest. How many more are expected to use this area. Defend projections and explain methodology.*

*PLAN: How will the plan specifically target increased bicycle/pedestrian usage?*

*NIN: Include school enrollment numbers if a SRTS project. Describe why this project will result in increased active transportation. Show how similar*

*programs have increased usage. Demonstrate how program will affect bicyclist/pedestrian behavior.*

**4. (25 pts) – Safety Goal**

- **Reduction in bicyclist and pedestrian injury/fatality.**

*A. The Problem.* Describe current active transportation safety conditions in project area. Provide baseline bicycle and pedestrian crash data from SWTRS, TIMS, OTS and any local sources.

*B. Solution.* How will proposed project/plan improve bike/pedestrian safety in project area?

*IN: Identify countermeasures included in project that will address type of collisions reported at the project area. Describe how project will: reduce speed or volume of motor vehicle; improve sight distance and visibility; improve compliance with local traffic laws; eliminate behaviors that lead to collision; address inadequate traffic control devices, bicycle facilities, crosswalks or sidewalks.*

*PLAN: Plans should have systematic method for identifying safety hazards. Describe hazards and how plan will mitigate against them or countermeasures that will be implemented.*

*NIN: Describe how the program educates and encourages safe behavior amongst all road users.*

**5. (10 pts) – Public Health Goal**

- **Improvement in public health – especially in students;**

*A. The Problem.* Describe project area community's health challenges as they relate to active transportation. These can include statistics on obesity, asthma factors and general air quality.

*B. Solution.* Describe how proposed program/plan will address and improve these health challenges.

*IN/PLAN/NIN: Utilize public health data available from local health department. Demonstrate how positive health outcomes will result from project/plan.*

**6. (7 pts) – Disadvantaged Communities Consideration**

- **Providing projects to low-income and otherwise defined ‘disadvantaged communities’;**

*A. The Problem.* Is your community considered ‘disadvantaged’ based on the criteria listed below? If so, what percentage of your plan/project will benefit this community?

*B. Solution.* Describe how your program/plan will address the needs of the project area’s ‘disadvantaged community’?

*IN/PLAN/NIN: Utilize options 1 through 4 to demonstrate disadvantage community status. Describe how your project/plan will specifically impact a disadvantaged community.*

**7. (15 pts) – Public Participation Consideration**

- **Providing projects that have public support and endorsement**

*A.* Describe in detail and provide documentation indicating how the community was involved in selecting projects or if a plan, how process will involve the public. Who was involved in identifying the selected projects? Describe the feedback and plan for future engagement with the public throughout the project.

**8. (5 pts) – Cost Effectiveness Consideration**

- **Providing projects that use public funding efficiently and weighs the relative costs and outcomes (effects) of two or more alternatives.**

*A.* Describe the other considered alternatives and show how the cost/outcomes were related. Why does this project have the best cost/outcome ratio?

**9. (0-5 pts) – Leveraging Non-ATP Funds**

- Projects with demonstrated funding score higher – show what portion of project budget is leveraged by outside funding. (Points dependent on % of project funded by outside funds).

# Riverside Department of Public Health

## ACTIVE TRANSPORTATION PROGRAM

### CYCLE 3

### NARRATIVE QUESTIONS

Suggestions for Revisions

Version B

February 13

#### I. PROJECT INFORMATION

- A. **Project Location**
- B. **Project Description** (*max 100 words*)

#### II. PROBLEM STATEMENT (35 POINTS)

- A. **Traffic Injuries/Fatalities** (*10 points*) - Describe the plan/program influence area or project location's history of collisions resulting in fatalities and injuries to non-motorized users and the source(s) of data used (e.g. collision reports, community observation, surveys, audits).
- B. **Public Health** (*10 points*) – Describe the health challenges of the targeted users of the project/program/plan as they relate to active transportation. (Issues may include rates of obesity, diabetes, other chronic illness due to physical inactivity, asthma rates, etc.).
- C. **Disadvantaged Communities** (*10 points*) – Describe the plan/program influence area or project location's service to disadvantaged communities based on the criteria listed below? (Poverty level, air quality, etc.) What percentage of your plan/project will benefit this community?
- D. **Other/Personal Safety** (*5 points*) – Describe the plan/program influence area or project location's history of crime as it relates to non-motorized users and the source(s) of data used (e.g. violent crime statistics, community observation, surveys, and audits).

#### III. PROPOSED SOLUTION (40 POINTS)

- 1. **Strategies** (*20 points*) – Describe how the applicant agency will work to solve the problem(s) identified above with regards to increased active transportation through improved connectivity, mobility, safety and air quality.
- 2. **Public Participation** (*10 points*) – Describe the community based public participation process that culminated in the project/program proposal or will be utilized as part of the development of a plan.
- 3. **Agency qualifications** (*5 points*) – Describe past grant performance, current projects, leverage, etc.
- 4. **Program Outcomes** (*5 points*)
  - 1. **Evaluation** (*Non-Infrastructure and Plans only*) - Describe the plan for evaluating the project.
  - 2. **Cost Effectiveness** (*Infrastructure only*) - B/C Tool

#### IV. PERFORMANCE MEASURES (20 POINTS)

A. **Goals and Objectives:** State the goals and objectives in measurable terms that relate directly to the identified problem(s). The objectives should be concise, address specific issues, and be realistic with a reasonable probability of achievement.

- **Method of Procedure** (*Infrastructure only*) – State goals and objectives that relate directly to the identified problem(s). List method of procedure/phases, timeline (include Gantt chart).
- **Scope of Work** (*Infrastructure only*) – List objectives, activities, timeline, and deliverables. (Include Scope of Work chart).

#### V. USE OF CALIFORNIA CONSERVATION CORPS (CCC) OR A CERTIFIED COMMUNITY CONSERVATION CORPS (0 to -5 points)

**From:** [Victoria Cacciatore](#)  
**To:** [Waters, Laurie@DOT](#)  
**Cc:** [Renee DeVere-Oki](#)  
**Subject:** Last round of comments on the draft ATP Guidelines  
**Date:** Monday, February 22, 2016 4:34:18 PM

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Hi Laurie,

Thanks for the opportunity to work on the draft Guidelines. We at SACOG appreciate this chance to provide input to help the program grow stronger and more efficient at achieving its goals. Thank you also for your collaboration with Caltrans to streamline the application and eliminate redundancy in questions and the points awarded for different metrics. Here are our last couple of points for your consideration as you develop the final version of the Guidelines for CTC adoption:

#### Scoring criteria

- We support CTC's efforts to recognize where there may be a duplication of awarding points for specific criteria, such as the potential for overlap in points designated for disadvantaged community benefit and for public participation, cost effectiveness (by way of the consideration of alternatives) and planning, and the potential of double counting a benefit to disadvantaged communities if the public health criteria was measured solely on quantitative data from available tools.
- We support focusing ATP funds on high performing projects with the greatest potential to increase biking and walking throughout the state, and increasing the safety of active transportation users. To that end, we support CTC's proposed adjustment of points awarded to the "public participation and planning" criteria from 15 to 10, and previous discussions to adjust the points awarded to projects demonstrating a disadvantaged community benefit from ten points to either five points or zero points. If any additional points (beyond what is currently reflected in the draft Guidelines) were to be freed up through reduction of points in some categories, we would encourage CTC to augment the points awarded towards performance-driven metrics, such as the increasing biking and walking metric.
- We encourage continued evaluation of including an assessment of how proposed projects contribute towards regional GHG reduction strategies.
- Please consider whether the criteria for "Prior ATP funding award" could be expanded to "prior federal funding award", as projects with pre-construction phases funded with CMAQ dollars or other federal dollars face the same risk of losing the money if the project is not built within a limited amount of time. Another option would be to combine this metric with the fund leveraging category and clarify that it includes money spent across all project phases for the ATP-specific scope, even if the project is only applying for construction funding.

#### Other Guidelines Comments

- Under Section VI Allocations, please include some language that would describe the

MPO's role for scope changes taking place prior to allocation; an example might be (new text in italics): "Any scope changes must be presented to Caltrans for consideration prior to allocation. *Projects selected through the MPO ATP will need to be approved by the MPO consistent with the MPO's process for approving scope changes on competitively awarded projects.* Caltrans will make a recommendation of approval to the Commission for final approval. Scope changes that result in a decrease of active transportation benefits may result in removal from the program." Language related to this new text may need to be added to Section VIII Roles and Responsibilities for both Caltrans and MPOs with Large Urbanized Areas.

#### Evaluation Process and Application

- For any proposed methods to determine "direct benefits" to disadvantaged communities, we encourage CTC and/or the ATP DAC subcommittee to test the methods on projects awarded through prior rounds to verify the proposal does not overly complicate the application process.
- We encourage CTC to add scorers to the process so each application is reviewed and scored by, at minimum, three evaluators from diverse areas of expertise applicable to active transportation.

We are happy to work with you to provide any data (and assistance, when possible) for the Sacramento region that may be of help should you want to further analyze how altering the points awarded to DAC-benefiting projects would impact the ATP, or to examine any other parts of your program. We also look forward to working with Caltrans to streamline the application and refine it into the most helpful tool for evaluators while bringing the level of effort/resources/time needed for project sponsors down to an appropriate level.

Regards,

**Victoria S. Cacciatore**  
Active Transportation Analyst  
Sacramento Area Council of Governments  
1415 L Street, Suite 300  
Sacramento, CA 95814  
**p:** [916.340.6214](tel:916.340.6214)  
**e:** [vcacciatore@sacog.org](mailto:vcacciatore@sacog.org)  
**w:** [www.sacog.org](http://www.sacog.org)

Make our region a better place to bike!

**From:** [Jesse Robertson](#)  
**To:** [Waters, Laurie@DOT](mailto:Waters.Laurie@DOT)  
**Cc:** [dowp@dow-associates.com](mailto:dowp@dow-associates.com); "Lisa Davey-Bates"  
**Subject:** Comments on the 2017 Active Transportation Program Guidelines  
**Date:** Monday, February 22, 2016 5:04:54 PM

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Laurie,

Thank you for offering ample opportunity for input into the 2017 Active Transportation Program Guidelines.

Lake APC staff called into all four of the ATP Guidelines workshops and I, for one, would like to thank you for retaining the 10 points for Disadvantaged Communities. I agree with an assessment that you made at the Fresno workshop in which you acknowledged that the majority of participants and a majority of the State supported a scaled approach for awarding as much as ten points to the most disadvantaged communities. This approach is not expected to preclude more affluent parts of the State from competing for discretionary funds and it helps to offset the five points awarded for the leveraging of funds for those communities lacking funds to match.

We recognize the importance of geographic equity to some degree, whether targeted or not, and making sure that each region has opportunities to receive funding. The evaluation and scoring criteria that is assigned to the evaluators may offer another opportunity to address both inaccurate assertions on behalf of the applicants and recognizing consistency with program goals in terms of the different contexts due to regional variation.

Feel free to call on me; I will offer to volunteer to assist however I can.

Jesse Robertson, Senior Transportation Planner  
Lake Area Planning Council/Dow & Associates  
367 N. State Street, Suite 206  
Ukiah, CA 95482  
(707) 263-7799 x 23 (t)  
(707) 463-2212 (f)  
[robertsonj@dow-associates.com](mailto:robertsonj@dow-associates.com)



# CALIFORNIA RURAL LEGAL ASSISTANCE, INC.

FIGHTING FOR JUSTICE, CHANGING LIVES

SINCE 1966

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Ms. Laurie Waters, Active Transportation Plan Coordinator  
California Transportation Commission  
1120 N Street, MS-52  
Sacramento, CA 95814

February 22, 2016

Dear Ms. Waters:

California Rural Legal Assistance has represented low income people and farmworkers residing in rural disadvantaged and disenfranchised communities for fifty (50) years. We submit these comments on the 2017 ATP guidelines in order to ensure that these communities are treated fairly throughout the ATP competition and/or funding process.

## **Section 13(A), Page 8: Disadvantaged Communities**

There are four potential means by which a project site can be considered a “Disadvantaged Community”. The first three (3) options appear to be fairly standard and empirical methods by which economic disadvantage can be approximated. The fourth option is unwieldy and appears to allow for approval of communities that are not really disadvantaged.

One commentator during the teleconferences hosted by the CTC suggested that being the least wealthy neighborhood within an otherwise affluent area could lead residents in that neighborhood to be “living as if poor” relative to their more affluent neighbors. The goal of the ATP is to benefit California’s Disadvantaged Communities, so priority should be given to areas where median incomes are extremely low, subsidized school meal utilization is high, and there is substantial environmental burden.

The use of “regional definitions of Disadvantaged Communities” as adopted by the various regional transportation planning agencies also is problematic. The state should closely scrutinize those regional definitions if it is going to use them. Many rural Disadvantaged Communities have been disenfranchised from the process of participating in public decision making in local and regional agency processes. Many residents in these communities are unlikely to be aware of the existence of the multiple layers of administrative agencies that play a role in transportation planning. They also do not have ready access to public hearings, outreach is lacking, language access often is not made available and hearings are not conveniently scheduled.

It often is this disenfranchisement that has contributed to the disparity in the provision of transportation infrastructure and services for Disadvantaged Communities.



# CALIFORNIA RURAL LEGAL ASSISTANCE, INC.

FIGHTING FOR JUSTICE, CHANGING LIVES

SINCE 1966

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The regional definition option mentions Title VI obligations, but there is no apparent mechanism by which Title VI compliance can be determined.

Lastly, the last full paragraph of this section allows MPOs to utilize criteria different from that adopted by the Commission in determining which projects benefit Disadvantaged Communities, as long as the criteria are approved by the Commission.

The CTC should independently assess whether the alternative criteria lead to new disparities in the provision of transportation infrastructure or services or further perpetuate existing disparities in violation of Title VI and the purpose of the program. The CTC also should require that those alternative criteria are subject to public comment and review prior to approval by the CTC.

## **Section 13(E), Pages 10-11: Active Transportation Plan in Disadvantaged Community**

This section sets forth the general components of an active transportation plan. However, the title of the section seems to indicate that the ensuing list of required components will be particularized to the needs of Disadvantaged Communities.

There is only one mention of Disadvantaged Communities among the required components. It reads, in its entirety, as follows: “[a] description of the extent of community involvement in development of the plan, including disadvantaged and underserved communities.”

Public involvement in governmental decision making and planning is far from certain in disadvantaged communities and simply providing a description of the community involvement in development of the plan does nothing to increase actual public participation.

A rote recitation of the dates, times or attendance in public meetings would do little to describe the actual extent of community involvement within a Disadvantaged Community. This section does little to ensure that the actual needs of the Disadvantaged Community were actually received, considered and/or incorporated into the ultimate Plan.

A posted notice of a meeting or an announcement in a newspaper of general circulation will not be sufficient to ensure participation of the residents in a Disadvantaged Community; much less garner the community’s input with respect to its transportation deficits. Access must be ensured, language access must be provided, education and outreach must be conducted, all meeting and hearing schedules must be convenient, trusted community organizations must be involved. Meaningful community input is required.

The CTC should provide guidance and required criteria requiring and demonstrating meaningful public participation in the planning process. Among other things, the CTC can and/or should consider the following.

1. The day, time and location of the meetings held;
2. The number of community residents attending the public meetings;



3. The extent of outreach efforts to make Disadvantaged Community members aware of the opportunity to provide, and the need for, their input in the planning process;
4. The use of translated materials;
5. The use of interpreters;
6. A detailed statement and/or analysis as to how the Plan will resolve and/or eliminate transportation deficits in Disadvantaged Communities.
7. A description of the input and/or comments received from community members as well as a statement of how the input/comments were addressed in the plan or an explanation regarding why they were not addressed.
8. A description of any community education events conducted by the jurisdiction, along with copies of any materials prepared for the purposes of informing, educating and/or training Disadvantaged Community members about the ATP.

### **Section 18, Page 14: Benefit to Disadvantaged Communities**

We appreciate that you have restored the points allotted for “Benefit to Disadvantaged Communities,” from five (5) to ten (10). However, the criterion goes on to say that “[s]cores will be scaled in relation to the severity of the disadvantaged community affected by the project.”

The intent of this language is easily understood: the more disadvantaged a community is, the more points it garners in relation to communities that are disadvantaged to a lesser extent. The provision sets forth no metric by which the scaling is to be accomplished.

However, the risk created is that differing, subjective, opinions regarding the disadvantage suffered in one community versus that of another will lead to inconsistent results among the review teams. Those making the determination (above the MPO level) as to which community suffers the most disadvantage will likely have little to no actual exposure and/or experience in the various and particular challenges faced by each such community.

A community that qualifies as disadvantaged under options one (1) through three (3) should be awarded the entire ten point allotment. If there is to be scaling, however, we suggest that the factors to be considered as well as their relative weights be set forth in the criterion.

In addition, scaling should be done only if an applicant seeks to qualify the project area as a Disadvantaged Community by way of option four (4). That is in addition to the showings already required by option four, an applicant’s score on this criterion should be based on whether the community in question is of extremely low income, suffers from exposure to nearby toxic sites or substances, is experiencing some sort of or other EJ disadvantage, is a historically disadvantaged farmworker community, or is an area of concentrated race, ethnicity, or language spoken other than English.



**Section 18, Page 14: Public Participation and Planning. (0 to 10 points)**

This criterion originally was allotted 0 to 15 points, but that has been reduced to ten (10) points in the second draft of the Guidelines. We suggest that the CTC restore the point allotment to 15 in view of the historical disenfranchisement of Disadvantaged Communities. More points for jurisdictions that seek out and value the input given by members of Disadvantaged Communities would be consistent with the goals of the program and other applicable law.

The criterion relies upon indicia of participation that are not particularly probative of the extent to which the public actually participated in the process. Noticed meetings do not necessarily lead to public participation and input. Consultation with local stakeholders is important, if the stakeholders are reflective of all economic and demographic segments of the community, particularly from disadvantage racial, ethnic, economic, language and other vulnerable groups. The extent to which jurisdictions engage residents in the languages spoken in those communities is particularly important.

The assessment pursuant to this criterion should examine the totality of the circumstances related to an applicant’s community outreach efforts. Please see the list in Section 13(E) set forth above.

**Section 18, Page 15: Leveraging of Non-ATP Funds (0 to 5 points)**

The Guidelines award points for leveraging of non-ATP funds. However in determining the extent to which funds are leveraged, the Guidelines appear to state that in-kind matching is not to be used in this determination. This seems to conflict with the provisions in Section 6, Page 5 of the Guidelines regarding “Matching Requirements.” In particular Section 6 of the Guidelines states that the CTC does “not” require matching. However, if an applicant can leverage matching funds it will score more points than an applicant that can only show in-kind matching. Thus the question becomes if a match is not required to begin with, why give applicants that are able to match with funds a competitive advantage over those who can only garner in-kind support? In many rural Disadvantaged Communities, many of the eligible applicants have limited operating budgets and discretionary funds. Therefore, they may only be able to show in-kind support rather than matching funds.

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Lastly, the Guidelines also provide that MPOs “may” require a match if they conduct their own MPO competitive application process. We suggest that the CTC reconsider this, as it may lead to inconsistent results between applicants even within the same MPO jurisdiction. That is, if the CTC does not require a match, but awards points for leveraged funds (and hopefully in-kind matching as well), then MPOs should be required to utilize the same policy and/or scoring criteria.

Thank you,

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**From:** [Tyler Summersett](#)  
**To:** [Waters, Laurie@DOT](mailto:Waters.Laurie@DOT)  
**Subject:** RE: 2017 ATP Guidelines - Comments  
**Date:** Tuesday, February 23, 2016 9:07:52 PM

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Hi Laurie,

Thank you for the breadth and persistence of your outreach.

I have attended many of the workshops and I know that you are faced with a real challenge in responding to and incorporating the many comments, suggestions and input that you receive.

Please accept this email as part of your efforts for comprehensive feedback.

The Tuolumne County Transportation Council is trying to build Active Transportation networks that allow our residents and guests to walk and bike to various destinations within the community. The Council has formalized this commitment in partially funding a position within its staff Planner series to work on moving these types of projects forward.

There have been many planning studies completed, community outreach meetings held, and funding applications filled out.

However, the overall effort is still going backwards. Under previous Federal funding legislation, there were dollars we knew we could bank on (CMAQ, TE) to get bicycle and pedestrian projects built!

The mission of the Active Transportation Program is to increase the percentage of walking and bicycling in California on a day to day basis. However, under the current program, it seems fewer projects are landing on the ground, to support this State goal.

Our suggestion for the ATP is to:

- Increase the points for Question 1 which really gets to the heart of the project initiative- Will the project increase walking and biking (50 points)!
- Reduce points for the # and/or rate of accidents. This has been tricky to quantify and remains quite subjective (10pts). This will create more of a non-motorized STIP program (capacity increasing) and less of a SHOPP program.
- Keep DAC points at 5. Again, another real controversial item, and I know this has taken up a lion's share of the discussion on many occasions, which is interesting considering the relatively low number of overall points (5 points).
- Separate Recreational Trail Program funds out of the ATP and allow State Parks to administer this program. This will allow the program to again fund the type of projects it was initially created to support.

Thanks for considering these bullets and for all your work to coordinate with the many Rural interest groups that are weighing in as part of this process.

Respectfully,



February 24, 2016

Mr. Will Kempton  
Executive Director  
California Transportation Commission  
1120 N Street, Mail Station 52  
Sacramento, CA 95814

**SUBJECT: 2017 Active Transportation Program Guidelines**

Dear Mr. Kempton:

The Merced County Association of Governments (MCAG) thanks you for the opportunity to comment on the 2<sup>nd</sup> Draft 2017 Active Transportation Program (ATP) Guidelines, dated February 16, 2016.

MCAG supports the provisions contained within this draft to strengthen the documentation requirements for benefits to a disadvantaged community and to keep the scoring criteria for disadvantaged communities at 0 to 10 points.

**Section 13.A – Project Type Requirements – Disadvantaged Communities (pages 8-9)**

We support the requirements for verifiable data to assure direct benefits to Disadvantaged Communities. This will help increase benefits to the most disadvantaged, assist reviewers in scoring projects, and limit any potential misrepresentation on this issue by project applicants.

**Section 18 – Scoring Criteria (page 14)**

We support keeping the range of points available for Disadvantaged Communities at 0 to 10 points, and to scale the number of points awarded in relation to the severity of the disadvantaged community affected by the project.

First, the definition of a Disadvantaged Community is already broad enough to allow for geographic equity: it includes the most disadvantaged 25% according to the CalEnviroScreen tool.

Second, any decrease in the number of points possible for Disadvantaged Communities would jeopardize the competitiveness of these communities and their ability to fully share in the benefits of the Active Transportation Program.

February 24, 2016  
Mr. Will Kempton

Page 2 of 2

Many of the most disadvantaged communities in the state are found in the San Joaquin Valley and in the MCAG region. They suffer disproportionately from environmental pollution and other hazards that can lead to negative public health effects, and include areas with concentrations of people that are of extremely low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, and low levels of educational attainment.

Lowering the maximum points given to disadvantaged communities would significantly decrease the ability of MCAG and its jurisdictions to implement our transportation efforts to improve air quality and achieve greenhouse gas reduction goals.

Thank you for your consideration of our comments. If you have any questions please contact Matt Fell, Planning Manager, at 209-723-3153 ext. 320, or [matt.fell@mcagov.org](mailto:matt.fell@mcagov.org)

Sincerely,

A handwritten signature in black ink, appearing to read "Marjie Kim", written in a cursive style.

Marjie Kim  
Executive Director



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Website: [www.maderactc.org](http://www.maderactc.org)

February 24, 2016

Mr. Will Kempton  
Executive Director  
California Transportation Commission  
1120 N Street, Mail Station 52  
Sacramento, CA 95814

**SUBJECT: 2017 Active Transportation Program Guidelines**

Dear Mr. Kempton:

The Madera County Transportation Commission (MCTC) is pleased to submit its comments on the 2<sup>nd</sup> Draft 2017 Active Transportation Program (ATP) Guidelines. MCTC supports the provisions contained with the Draft 2017 ATP Guidelines to keep the scoring criteria points for Disadvantaged Communities at 10 points, and to scale the number of points awarded in relation to the severity of the disadvantaged community affected by the project. MCTC additionally supports the language contained in the draft guidelines that refines and strengthens the data required to support the designation of a community as Disadvantaged. We feel that these provisions will serve to limit any potential misrepresentation on this issue by project applicants, and will allow all regions in the state to fully share in the benefits of the ATP.

As the Commission is aware, the definitions for Disadvantaged Communities in the first 2014 ATP cycle included communities that were identified as being in the most disadvantaged 10% in the state according to the CalEnviroScreen tool. In the second 2015 ATP cycle, this definition was expanded to include the top 25% of CalEnviroScreen scores. This had the effect of greatly increasing the number of potential communities statewide that were eligible to be designated as a Disadvantaged Community.

As a result, the benefit provided by the ATP to the communities that are the most disadvantaged in the state has been diluted. These communities, many of which are found in the MCTC region, suffer disproportionately from environmental pollution and other hazards that can lead to negative public health effects, and include areas with concentrations of people that are of extremely low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, and low levels of educational attainment.

Mr. Will Kempton  
February 24, 2016  
Page 2

Any decrease in the number of points possible for Disadvantaged Communities would jeopardize the ability of disadvantaged communities such as the MCTC region to fully share in the benefits of the Active Transportation Program. This will seriously impact the ability of MCTC in implementing our transportation efforts to achieve our greenhouse gas reduction goals contained within our 2014 Regional Transportation Plan and Sustainable Communities Strategy, as mandated in Senate Bill 375 (Chapter 728, Statutes of 2008) and Senate Bill 391 (Chapter 585, Statutes of 2009).

Thank you for your consideration of MCTC's comments. If you have any questions about our comments or any other ATP-related issues, please contact me at (559)675-0721.

Sincerely,



PATRICIA TAYLOR  
Executive Director

cc: Ms. Laurie Waters, California Transportation Commission, Associate Deputy Director  
Ms. April Nitsos, Caltrans, Chief, Active Transportation Program and Special Programs  
Mr. Andrew Chesley, SJCOG Executive Director  
Mr. Bill Higgins, CalCOG, Executive Director  
Mr. Tony Boren, Fresno COG, Executive Director  
Mr. Ahron Hakimi, Kern COG, Executive Director  
Ms. Terri King, KCAG, Executive Director  
Ms. Marjie Kim, MCAG, Executive Director  
Ms. Rosa Park, StanCOG, Executive Director  
Mr. Ted Smalley, TCAG, Executive Director  
Mr. Sarkes Khachek, SBCAG, RTPA Moderator

**From:** [Piet Canin](#)  
**To:** [Waters, Laurie@DOT](mailto:Waters.Laurie@DOT)  
**Cc:** [Rachel Moriconi](#)  
**Subject:** ATP 2017 guidelines  
**Date:** Wednesday, February 24, 2016 4:36:00 PM

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Hi Laurie,

Thank you for the opportunity to comment on the ATP 2017 guidelines. Jeanne Lepage from Ecology Action has been very involved in providing input to this process but I also wanted to comment on one part of the guidelines.

Over several decades of implementing SRTS non infrastructure programs the hardest part has been finding reliable, ongoing funding to offer consistent services to local school children. There are fewer and fewer funding sources for SRTS programs as the need increases. So its great to have ATP funding for NI programs but the preference of CTC to fund pilot programs rather than ongoing operations just isn't realistic for well run SRTS NI programs. Why not invest in what works then look for something new that might not work? Wouldn't it be better to focus on programs that deliver quality and quantity services that meet SRST objectives?

Based on the funding realities of SRTS programs I would urge the CTC to shift their focus away from pilot programs and look for programs that are effectively getting more CA school students to safely bike and walk to school more often.

Thank you for your consideration.

**Piet Canin | Vice President Transportation**  
**EcologyAction | [EcoAct.org](http://EcoAct.org)**  
Direct (831) 515-1327 | Cell (831) 227-8987



February 24, 2016

Laurie Waters, Associate Deputy Director  
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[laurie.waters@dot.ca.gov](mailto:laurie.waters@dot.ca.gov)

**VIA E-MAIL**

**Re: Non-Infrastructure Recommendations for the Active Transportation Program (ATP) Cycle 3 Guidelines**

Dear Ms. Waters,

On behalf of the undersigned organizations, we commend the California Transportation Commission (CTC) for your leadership in the implementation of the Active Transportation Program (ATP) as a comprehensive statewide commitment to expand safe, active travel-- especially for disadvantaged communities, schools, and residents. Below, we outline several recommendations to strengthen the program to maximize the benefits of the program for all Californians:

**Recommendation 1: Award Full Points in "Prior ATP Funding Award" Criteria for Non-Infrastructure Projects & Plans**

As written, this new category penalizes non-infrastructure projects and plans because these projects do not have pre-construction activities. If this category is maintained in lieu of directing the points back to the disadvantaged community benefit category, we recommend that non-infrastructure projects and plan applications to receive the full amount of points in this category outright. A community awarded a non-infrastructure award in a previous cycle to conduct a pilot should be able to receive points for an expansion of their program based on the initial pilot's findings and lessons learned. Likewise, a plan funded through the ATP should receive these points for implementing projects identified and developed in the funded plan.

**Recommendation 2: Remove Restriction on Funding Ongoing Operations for Non-Infrastructure Programs**

In Section 11, the guidelines state that funding ongoing operations for non-infrastructure programs is ineligible and that the ATP will fund only start-up programs. This restriction would make the more than 3,000 schools that have received Safe Routes to School funding from the state in the past, whether through ATP or its predecessor SR2S, ineligible to apply for ATP funding to maintain or expand their programs.<sup>1</sup> We recognize the need to award funding to schools that have not had Safe Routes to School non-infrastructure projects in the past, especially in disadvantaged communities, but this restriction is harmful to the safety of children walking and bicycling to school in many communities across California. Approximately 31% of children in California walk or bike to school, while 62% live within two miles of school but 52% are driven.<sup>2</sup> Safe Routes to School programs have been shown to increase walking and bicycling in California schools in the range of 20 to 200

<sup>1</sup> This estimate comes from award lists from the SR2S and ATP Cycle 1 and 2 available on Caltrans' website:  
[http://www.dot.ca.gov/hq/LocalPrograms/saferoutes/sr2s\\_list.htm](http://www.dot.ca.gov/hq/LocalPrograms/saferoutes/sr2s_list.htm)

<sup>2</sup> University of California Berkeley Traffic Safety Center, 2007. "Safe Routes to School Safety & Mobility Analysis."  
<http://escholarship.org/uc/item/5455454c#page-1>

percent.<sup>3</sup> They also incur more benefits the longer they are in existence. For example, a longitudinal study of more than 800 schools in Florida, Oregon, Texas and DC found that Safe Routes to School interventions resulted in an average 25% increase in walking and bicycling to school over a five-year period due to non-infrastructure safety and encouragement programs, and another 18% due to infrastructure improvements.<sup>4</sup> If Caltrans moves to funding solely start-up programs, this will detrimentally impact the long-term return on investment of Safe Routes to School non-infrastructure programs funded with ATP or previous SR2S funding, and we will potentially be left with small improvements that do not last over time. Furthermore, the fact that Cycle 3 awards won't even be programmed until FY2019 has the very real potential of dissuading applicants for applying for non-infrastructure funding for brand-new programs, especially school districts that will have several cohorts of students move through by the time they receive this funding. Accordingly, we **strongly urge you to remove the restriction on ongoing operations, or alternatively, loosen the restrictions to allow for program expansions or programs with new components to be eligible for ATP funding.**

### **Recommendation 3: Remove the Requirement that Non-Infrastructure Applicants Demonstrate Access to Ongoing Funding**

The guidelines stipulate that non-infrastructure programs demonstrate funding for ongoing efforts beyond the life of the ATP grant. This requirement will discourage applications for non-infrastructure, especially if applicants cannot identify future sources of funding at the time of application. Given that alternate funding sources for non-infrastructure programs (e.g., private foundations, federal public health grants, etc.) often require a program to already be established before a program is eligible for the alternate funding, it is difficult, if not impossible for any non-infrastructure application to demonstrate funding for ongoing efforts with the details and certainty that is being asked. This is especially critical for disadvantaged communities that have a difficult time leveraging funds in general, let alone sustaining ongoing operations. Accordingly, we **recommend that the Guidelines remove this restriction or loosen it to allow applicants to identify speculative funding sources. Caltrans should also specify acceptable funding sources that can be used to demonstrate sustainable program operations (e.g. private foundations).**

### **Recommendation 4: Revise Eligible Applicants to Include Non-profit Organizations**

The new federal transportation bill, the Fixing America's Surface Transportation (FAST) Act, allows nonprofits to be eligible applicants for non-infrastructure funds from the Surface Transportation Set-Aside program (see FAST Sec. 1109(d)(4)(B)(vii)). We **recommend the Commission revise the ATP Guidelines language to add nonprofit organizations as eligible applicants** for non-infrastructure funding in compliance with the FAST Act. This change will enable many nonprofits applicants to directly apply for non-infrastructure projects, thereby removing hurdles that have been in place in the past and that have made project delivery difficult for Safe Routes to School non-infrastructure projects.

### **Recommendation 5: Allow for Plans & Non-Infrastructure to be Included in Single Application**

Section 7 states that requests for non-infrastructure and planning project funding cannot be combined. For Safe Routes to School projects, this can pose a challenge since there is overlap between Safe Routes to School plans and non-infrastructure programming, and benefits to including them in the same application, including reducing the burden on the applicant, who, in the case of Safe Routes to School projects, is often a school district and now potentially nonprofit organizations. Caltrans has even coded Safe Routes to School projects as both in previous cycles. We **recommend that Caltrans remove the restriction on applying for non-infrastructure and planning funds together in one application for Safe Routes to School projects.**

<sup>3</sup> University of California Berkeley Traffic Safety Center, 2007. "Safe Routes to School Safety & Mobility Analysis." <http://escholarship.org/uc/item/5455454c#page-1>

<sup>4</sup> McDonald, et al, 2014; Impact of the Safe Routes to School Program on Walking and Bicycling, *Journal of the American Planning Association*.

**Recommendation 6: 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 pedestrian, bicycle, or combined bicycle/pedestrian master plan. Moreover, only 7.5% of jurisdictions have adopted a pedestrian master plan, and half of our ten largest cities in California lack a 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, and 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 higher ceilings or targets for planning in disadvantaged communities** in excess of state's 2% ceiling up to 5% of funds in a regional competition. Additionally, we recommend that the Guidelines clarify that all regional MPO programs should provide no less than 1% of their funds for planning in disadvantaged communities

Additionally, we strongly **recommend that the Guidelines and Application further emphasize that planning funds are reserved for disadvantaged communities**. Priority must be placed on jurisdiction-wide plans or Safe Routes to Schools plan where the entire community qualifies as a DAC or where the entire student population served is eligible for free or reduced priced meals. For plan applications from jurisdictions with a mix of community types or serving a mixed student body, priority must be placed on those jurisdictions that serve 50% or more DAC residents or for Safe Routes to School plans, where over 75% of students qualify for free and reduced price meal.

**Recommendation 7: Develop Metric Applicable to Non-Infrastructure & Plans for Tiebreaker Decisions**

As currently drafted, the tiebreaker process overwhelmingly handicaps if not outright excludes the consideration of non-infrastructure projects and plans due to the emphasis placed on "construction readiness" and bias favoring infrastructure projects present in application questions 1 and 2. In a tiebreaker situation, non-infrastructure and planning projects would inevitably lose out to infrastructure projects even though in many cases the cost of these projects is much less. We recommend identifying a measure that can be used across all three types of projects to ensure fairness in the evaluation process. The "construction readiness for infrastructure projects" measure should be revised to include plans and non-infrastructure projects that are ready to start within a few months of award as part of the tiebreaker process.

In closing, Safe Routes to School non-infrastructure programs are often a precursor to larger scale plans and infrastructure requests, so it is important to maintain a respectable share of ATP funding for non-infrastructure programs. More than 3,000 schools across the state have benefited from Safe Routes to School funding and we urge you to keep the availability of ATP funding as open as possible to allow previous and future non-infrastructure applicants to be successful in obtaining the funding they need to make it safer to walk and bike to school in their communities.

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.

Sincerely,

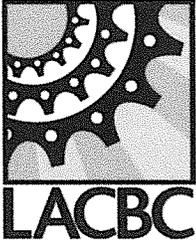
Bill Sadler, California Senior Policy Manager  
Safe Routes to School National Partnership

Wendy Alfsen, Executive Director  
California Walks

Jeanie Ward-Waller, Policy Director  
California Bicycle Coalition

CC:

Laurel Janssen, Deputy Director, California Transportation Commission, [laurel.janssen@dot.ca.gov](mailto:laurel.janssen@dot.ca.gov)  
April Nitsos, Chief, Office of Active Transportation and Special Programs, Division of Local Assistance, Caltrans, [april.nitsos@dot.ca.gov](mailto:april.nitsos@dot.ca.gov)



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Carson Bicycle Coalition  
Culver City Bicycle Coalition  
Downey Bicycle Coalition  
Montebello Bicycle Coalition  
Pomona Valley Bicycle Coalition  
Santa Clarita Valley Bicycle Coalition  
Santa Monica Spoke  
USC Bicycle Coalition  
Walk Bike Burbank  
Walk Bike Glendale  
Walk Bike Long Beach  
West Hollywood Bicycle Coalition

February 24, 2016

Laurie Waters, Associate Deputy Director  
California Transportation Commission  
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*via-email: laurie.waters@dot.ca.gov*

### **Comments on Active Transportation Program (ATP) Cycle 3 Guidelines & Application**

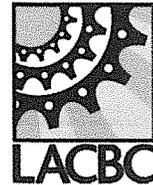
Dear Ms. Waters,

The Los Angeles County Bicycle Coalition (LACBC) works to make all communities in Los Angeles County into healthy, safe, and fun places to bike and walk. As Southern California's largest active transportation advocacy and education organization, LACBC works closely with public and community partners from across the region to plan, fund, and deliver biking, walking, and safe routes to school projects. In the first two cycles of the California Active Transportation Program (ATP), LACBC provided direct technical assistance to applicants and scored applications as evaluators. The ATP is our region's largest source of funding for biking, walking, and safe routes to school projects and we are delighted to continue working with you to grow, strengthen, and streamline the program so that more communities can benefit from these investments.

I also have the pleasure of serving as the chair of the Planning Subcommittee for the ATP Technical Advisory Committee (ATP-TAC). While neither the Planning Subcommittee nor the full ATP-TAC has taken a formal position on recommended changes to the program guidelines and application, the first four comments below are informed by discussions held in these forums. The remaining comments are informed by our collaboration with state partners, community-based organizations, and public agency partners.

#### **1) Allow MPO Discretion for Setting Aside Funds for Planning to Meet Regional Needs**

The majority of cities in Los Angeles County and across the State of California do not have an adopted bicycle, pedestrian, or safe routes to school plan, let alone all three. However, some regions have a greater need for planning funds than others depending on the number of local jurisdictions and historical investment in multimodal planning. 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. LACBC supports the recommendation that the Guidelines provide flexibility for



MPOs to set higher targets for planning in disadvantaged communities in excess of state's 2% set-aside, up to 5% of funds in a regional competition. Additionally, we strongly recommend that the Guidelines and Application further emphasize that planning funds are reserved for disadvantaged communities.

## **2) Administer Planning Set-Aside as a "Target" Rather than a "Ceiling"**

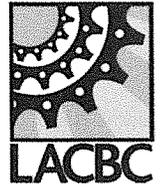
Planning applications are inherently different than applications for infrastructure. By definition, community outreach hasn't yet been done, data hasn't yet been collected, and improvements haven't yet been identified. These are all critical elements for scoring infrastructure projects that do not apply for plans. The ATP application was written primarily for infrastructure projects and as a result does not provide reliable scoring for planning grants. In Cycle 2, these scoring irregularities caused good planning applications to not score as well as infrastructure applications, so even the meager three percent set-aside for planning was underutilized. Given the fundamental difference between planning applications and infrastructure applications, it is critical that planning funds be administered as a true set-aside, or target, within which planning applications compete amongst themselves. Planning application scores are not comparable to infrastructure application scores and a misguided comparison should not result in less funding for planning, as was the case in Cycle 2. Unless there are insufficient high-quality planning applications, the CTC should aim to program the full planning funding target to planning grants. The Strategic Growth Council's Affordable Housing and Sustainable Communities program is a good model for administering a program that includes funding targets for different types of projects.

## **3) Improve Planning Application**

The application needs to better accommodate planning grants. As mentioned above, much of the data requested by the application is exactly the data that is collected and analyzed during the planning process. All planning applications that meet the ATP planning definition contained within the guidelines will identify community needs, promote the use of walking and biking, and improve safety and public health. The planning application should instead differentiate applications based on demonstrated financial need, strong community partnerships, and interagency coordination—particularly with school districts. The ATP-TAC Planning Subcommittee intends to provide specific recommended changes to the application to achieve these objectives.

## **4) Better Integrate Safe Routes to Schools into Community-Wide Planning**

The ATP currently has strong guidelines for community-wide planning that were inherited from the former Bicycle Transportation Account (BTA) program, one of ATP's predecessors. These guidelines have resulted in consistent, high-quality plans for many jurisdictions throughout the state. One of the benefits of an integrated active transportation plan is that community needs are considered more holistically rather than the BTA's focus on bike commuters. The guidelines should be updated to better reflect current comprehensive planning practices by strengthening provisions for safe routes to school specifically, and youth and senior mobility generally. Suggested guidelines revisions to accomplish this are attached.



## **5) Maintain 10 Points for Disadvantaged Communities (DACs)**

LACBC signed on to a letter from Los Angeles County stakeholders requesting strong protections for DACs. Some of our partners have recommended that the 10 points allocated for DACs be scaled to reflect the severity of a community's disadvantaged status and that points reflect the meaningfulness of the benefits to disadvantaged residents, not just the project's proximity to a disadvantaged census tract. A project's meaningful benefits to a DAC should be evaluated based on the applicant's documentation that elements of the project are responsive to concerns or opportunities identified by the residents of the particular community. LACBC supports efforts to strengthen ATP's DAC provisions to ensure that the program delivers meaningful benefits to DACs.

## **6) Revise Public Health Question to Incorporate Social Determinants of Health**

The health benefits of walking and biking are well understood. It is not necessary or helpful for applicants to demonstrate why the increase in walking and biking resulting from their project will improve public health generally. The ATP application should better differentiate among communities with different health outcomes and target investments in those communities with worse health outcomes.

The Public Health Alliance of Southern California has a comprehensive Health Disadvantage Index that provides census tract level detail on indicators that are significant determinants of health outcomes, including poverty, access to services, collision risk, and many other factors that can be addressed through active transportation investment. Applicants should be encouraged to go beyond traditional health data (e.g. obesity rates, diabetes rates) that are generally only available at a county or regional level and discuss specific ways in which the project will serve health-disadvantaged populations or otherwise improve determinants of health. Projects located in areas with greater health disadvantages should score higher.

## **7) Revise Safety Question to Include Population-Level Safety Risk**

The safety question has an important focus on evaluating the extent to which a particular project will address a specific, known safety problem with proven countermeasures. While this is important, it inherently disadvantages projects that build new infrastructure in a corridor that is not currently used for active transportation. For example, new bike paths that provide transportation options for a community, but aren't located along an arterial street, do not score well, even if they are located in a community with high collision rates. The safety question should require applicants to include population-level collision rates (which are available as part of the above-mentioned Health Disadvantage Index) for the project area, and award points for projects located in communities with high injury/fatality rates for people walking and biking.

## **8) Align Project Delivery Timeline and Allocation Process with the STIP**

We are aware of many potential project failures resulting from unforeseen or unavoidable schedule delays and the ATP's aggressive project delivery requirements. While LACBC shares the



Commission's concern about holding local agencies accountable for project delivery, we would like to see ATP administered more like the STIP, which is more flexible in allowing local agencies to delay programmed phases prior to the year of allocation. There should also be greater discretion for the Commission to allow extensions beyond the current single 12-month extension when the project sponsor has demonstrated their commitment to delivery and a reasonable schedule of progress. The Commission, Caltrans, and local agencies are partners in delivering the ATP's benefits to residents and we support reasonable accommodations that would increase project success rates.

### **9) Revise Eligible Applicants to Include Non-profit Organizations**

The new federal transportation bill, the Fixing America's Surface Transportation (FAST) Act, allows nonprofits to be eligible applicants for non-infrastructure funds from the Surface Transportation Set-Aside program (see FAST Sec. 1109(d)(4)(B)(vii)). We recommend the Commission revise the ATP Guidelines language to add nonprofit organizations as eligible applicants for non-infrastructure funding in compliance with the FAST Act. This change will enable many nonprofits applicants to directly apply for non-infrastructure projects, thereby removing hurdles that have been in place in the past and that have made project delivery difficult for Safe Routes to School non-infrastructure projects.

Thank you for the opportunity to provide feedback on the Cycle 3 Guidelines and Application. LACBC looks forward to continuing to work with you to make California a healthy, safe, and fun place to bike and walk. If you have any questions about these comments, I can be reached at [eric@la-bike.org](mailto:eric@la-bike.org) or (213) 629-2142, ext. 127.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Bruins", is written over a faint, circular stamp or watermark.

Eric Bruins  
Planning & Policy Director



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THE COUNTY OF  
SAN JOAQU

February 24, 2016

Mr. Will Kempton  
Executive Director  
California Transportation Commission  
1120 N Street, Mail Station 52  
Sacramento, CA 95814

**SUBJECT: 2017 Active Transportation Program Guidelines**

Dear Mr. Kempton:

The San Joaquin Council of Governments (SJCOC) is pleased to submit its comments on the 2<sup>nd</sup> Draft 2017 Active Transportation Program (ATP) Guidelines. SJCOC supports the provisions contained with the Draft 2017 ATP Guidelines to keep the scoring criteria points for Disadvantaged Communities at 10 points, and to scale the number of points awarded in relation to the severity of the disadvantaged community affected by the project. SJCOC additionally supports the language contained in the draft guidelines that refines and strengthens the data required to support the designation of a community as Disadvantaged. We feel that these provisions will serve to limit any potential misrepresentation on this issue by project applicants, and will allow all regions in the state to fully share in the benefits of the ATP.

As the Commission is aware, the definitions for Disadvantaged Communities in the first 2014 ATP cycle included communities that were identified as being in the most disadvantaged 10% in the state according to the CalEnviroScreen tool. In the second 2015 ATP cycle, this definition was expanded to include the top 25% of CalEnviroScreen scores. This had the effect of greatly increasing the number of potential communities statewide that were eligible to be designated as a Disadvantaged Community.

As a result, the benefit provided by the ATP to the communities that are the most disadvantaged in the state has been diluted. These communities, many of which are found in the SJCOC region, suffer disproportionately from environmental pollution and other hazards that can lead to negative public health effects, and include areas with concentrations of people that are of extremely low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, and low levels of educational attainment.

February 25, 2016  
Mr. Will Kempton

Page 2 of 2

Any decrease in the number of points possible for Disadvantaged Communities would jeopardize the ability of disadvantaged communities such as the SJCOG region to fully share in the benefits of the Active Transportation Program. This will seriously impact the ability of SJCOG in implementing our transportation efforts to achieve our greenhouse gas reduction goals contained within our 2014 Regional Transportation Plan and Sustainable Communities Strategy, as mandated in Senate Bill 375 (Chapter 728, Statutes of 2008) and Senate Bill 391 (Chapter 585, Statutes of 2009).

Thank you for your consideration of SJCOG's comments. If you have any questions about our comments or any other ATP-related issues, please contact me at (209) 235-0600, or David Ripperda, Assistant Regional Planner, at (209) 235-0450.

Sincerely,



ANDREW T. CHESLEY  
Executive Director

cc: Ms. Laurie Waters, California Transportation Commission, Associate Deputy Director  
Ms. April Nitsos, Caltrans, Chief, Active Transportation Program and Special Programs  
Mr. Bill Higgins, CalCOG, Executive Director  
Mr. Tony Boren, Fresno COG, Executive Director  
Mr. Ahron Hakimi, Kern COG, Executive Director  
Ms. Terri King, KCAG, Executive Director  
Ms. Marjie Kim, MCAG, Executive Director  
Ms. Rosa Park, StanCOG, Executive Director  
Mr. Ted Smalley, TCAG, Executive Director  
Ms. Patricia Taylor, MCTC, Executive Director  
Mr. Sarkes Khachek, SBCAG, RTPA Moderator



February 25, 2016

Laurie Waters, Associate Deputy Director  
 California Transportation Commission  
 1120 N Street, MS-52  
 Sacramento, CA 95814  
[laurie.waters@dot.ca.gov](mailto:laurie.waters@dot.ca.gov)

**VIA E-MAIL**

**Re: Recommendations for the Active Transportation Program (ATP) Cycle 3 Guidelines**

Dear Ms. Waters,

On behalf of the undersigned organizations, we thank you for the opportunity to comment on the Guidelines, and commend you and the California Transportation Commission (CTC) for making this a very open and transparent process. We have outlined below several recommendations to strengthen the program and ensure that we advance the goals of the Active Transportation Program (ATP) to increase bicycling and walking and make it safer for everyone.

**Recommendation 1: Revise Language re Benefitting Disadvantaged Communities (DACs) to Recognize the Benefits of Linear Projects in Providing Connectivity to DACs**

We believe the current draft language – which provides that only projects within or directly adjacent to a DAC could qualify as benefiting a DAC -- would inadvertently prevent certain deserving projects from qualifying for DAC points, even when they do provide legitimate, important benefits to DACs, and also advance the major goal of the ATP to increase active transportation by creating better bike/ped connectivity between neighborhoods and destinations. The projects most affected would be linear projects like bike lanes, paths and trails that do in fact provide significant benefit to a DAC, but may be constructed in phases. Not every phase may connect directly to the DAC, but the project overall may provide an important connection from the DAC to transit/jobs/schools/shopping/recreation, etc. Other projects that could be adversely impacted are bike/ped overpasses and underpasses that may close a key gap or overcome a major barrier like a freeway. Such projects should be able to qualify for DAC points by making the case that they benefit a DAC that may be nearby but not immediately adjacent, because they may provide the best bike/ped access across that barrier to key destinations that lie on the other side, or address an important safety issue.

To address this issue, we recommend that Sec. 13A be modified to read as follows:

*For a project to qualify as directly benefiting a disadvantaged community, the project must be located within, or in reasonable proximity (i.e., within ½ mile for a pedestrian facility or 2 miles for a bicycling facility), to the disadvantaged community served by the project; or the project must be an extension or a segment of a larger project that connects to or directly adjacent to that disadvantaged community. It is incumbent upon the applicant to clearly articulate how the project benefits the disadvantaged community; there is no presumption of benefit, even for projects located within a disadvantaged community.*

**We also support the following recommendations that were developed by the California Active Transportation Leadership (CATL) coalition:**

#### **Recommendation 2: Revise Eligible Applicants to Include Non-profit Organizations**

The new federal transportation bill, the Fixing America's Surface Transportation (FAST) Act, allows nonprofits to be eligible applicants for non-infrastructure funds from the Surface Transportation Set-Aside program (see FAST Sec. 1109(d)(4)(B)(vii)). We **recommend the Commission revise the ATP Guidelines language to add nonprofit organizations as eligible applicants** for non-infrastructure funding in compliance with the FAST Act. This change will enable many nonprofits applicants to directly apply for non-infrastructure projects, thereby removing hurdles that have been in place in the past and that have made project delivery difficult for Safe Routes to School non-infrastructure projects.

#### **Recommendation 3: 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 pedestrian, bicycle, or combined bicycle/pedestrian master plan. Robust active transportation plans are critical to ensuring that agencies have identified and prioritized high quality, effective infrastructure projects for future funding applications, and 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 higher ceilings or targets for planning in disadvantaged**

**communities** in excess of state's 2% ceiling up to 5% of funds in a regional competition. Additionally, we recommend that the Guidelines clarify that all regional MPO programs should provide no less than 1% of their funds for planning in disadvantaged communities. Additionally, we strongly **recommend that the Guidelines and Application further emphasize that planning funds are reserved for disadvantaged communities.**

We thank you for the opportunity to provide feedback on the Cycle 3 Guidelines and Application, and we look forward to continuing to work with you to advance the goals of the ATP.

Sincerely,

Laura Cohen, Regional Director  
Rails-to-Trails Conservancy

Douglas D. Houston, Executive Director  
State Parks Partners Coalition

Philip Sales, Executive Director  
Napa Valley Vine Trail Coalition

Stephanie Stephens, Executive Director  
California's Parks & Recreation Society

Laura Thompson, Bay Trail Project Manager  
San Francisco Bay Trail Project

Toody Maher, Executive Director  
POGO Park

Rue Map, Founder and CEO  
Outdoor Afro

Andy Hanshaw, Executive Director  
San Diego County Bicycle Coalition

Tim Boss, Off-Road Director  
Marin County Bicycle Coalition

Bruce Beyaert, Chair  
Trails for Richmond Action Committee

Randy Anderson, Owner and Principal  
TrailPeople

Tim Oey, President  
Friends of Stevens Creek Trail

Jim Shanman, Founder  
Walk 'n Rollers

Bill Rankin, President  
Save Our Trails

Claire Robinson, Managing Director  
Amigos de los Rios

Erich Pfuehler, Government Affairs Manager  
East Bay Regional Park District

CC:

Laurel Janssen, Deputy Director, California Transportation Commission, [laurel.janssen@dot.ca.gov](mailto:laurel.janssen@dot.ca.gov)  
April Nitsos, Chief, Office of Active Transportation and Special Programs, Division of Local Assistance, Caltrans, [april.nitsos@dot.ca.gov](mailto:april.nitsos@dot.ca.gov)



**Metro**

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Metropolitan Transportation Authority

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February 25, 2016

Ms. Laurie Waters  
Senior Transportation Planner  
California Transportation Commission  
1129 N Street, MS-52  
Sacramento, CA 9581

### LOS ANGELES COUNTY COMMENTS ON ACTIVE TRANSPORTATION PROGRAM

Dear Ms. Waters:

Thank you for the opportunity to provide input as you prepare for Cycle 3 of the Active Transportation Program (ATP). Metro is pleased to be a part of working towards its success. In discussing the ATP with a number of local jurisdictions and other regional partners and stakeholders in our area, we have identified the following comments & recommendations for the 2017 ATP guidelines:

- Increase the duration of time extensions from 12 months to 20 months to avoid potential problems related to programming phases that occurred during Cycle 1;
- Maintain 10 points for disadvantaged communities (DACs);
- Allow for MPOs to have flexibility towards awarding planning projects as well as safe routes to schools, non-infrastructure and low cost projects;
- Develop a "Generally Accepted Design Standards and Costs" for project sponsors to address eligibility with clear instructions; and
- Delay the Call for Projects by 2-4 months to allow for the ATP TAC to update the guidelines and application as well as delay the adoption of the Cycle 3 guidelines until May 2016 in order to improve streamlining of project delivery.

Enclosed please find more detailed discussion of our comments as well as a copy of the comment letter from the Southern California Association of Governments (SCAG) for which we also wish to express our support. Please contact Patricia Chen at (213) 922-3041 or myself at (213) 922-2887 should you have any questions.

Sincerely,

Wil Ridder  
Executive Officer  
Strategic Financial Planning and Programming

Enclosures:

Enclosure A – Metro Comments on ATP Cycle 3  
Enclosure B – SCAG Comment Letter

## **Metro Comments on Active Transportation Program Cycle 3**

### **GENERAL/PROCESS**

- 1) Further align guidelines regarding project delivery deadlines with STIP: the guidelines should resemble STIP for time extensions and ability to reprogram. Many ATP projects are large and complex, and/or tied to large, complex projects. More time flexibility is warranted for successful delivery. Projects with 3 or 4 phases can accumulate delays that could impact later phases such as construction, possibly causing them to lapse. 20 months is a far more reasonable time period, particularly for projects with multiple phases programmed in one or more fiscal years. Additionally, if an agency knows before a fiscal year that there is a problem, it should be able to reprogram. Active Transportation projects which are selected on a discretionary basis are not easier to deliver than other projects. Some ATP projects do encounter issues which were unforeseeable and are beyond the sponsor's control. Those sponsors should not be held to a tighter standard than sponsors under other programs such as the STIP that have these same issues.
  
- 2) Metro recommends maintaining ten points for disadvantaged community projects. Scoring points on a scaled basis rather than all or nothing will help ensure that funds are targeted to communities with the highest need.

A subgroup of stakeholders recently met to discuss disadvantaged communities scoring methods developed the following suggestions paraphrased as follows:

Directness is a very important aspect of the benefit of a project to a disadvantaged community. Directness points should be reserved for projects with at least 10% of their length or area within or directly adjacent to the disadvantaged community. Meaningfulness is also an important component of benefit to a disadvantage community. Meaningfulness may be defined by the following:

- a) It was requested and/or supported by the community it would serve
- b) It will be accessible to the community and
- c) There will be a specific and concrete benefit to members of the community.

5-6 points are recommended to be scored on a combination of directness and meaningfulness with the directness points scored on a scaled basis. The remaining 4-5 points are recommended to be awarded on a scaled basis to reflect the severity of disadvantage.

The subgroup will continue to meet and refine the recommendations.

- 3) **Ensuring Funding for Plans:** Plans are required for full points for projects over \$1 million, therefore limiting planning funds puts disadvantaged communities in an even more disadvantaged position, by perpetuating an obstacle to their receiving up to 15 points on the planning and community outreach question. This more than outweighs the up to 10 points for Disadvantaged Community status.

There is still demand and need for plans. In the Cycle 2 statewide competition less than 1% of available funds were awarded to planning projects, though almost \$18 million or 10% of the statewide funding availability was applied for.

To address the demand for plans and avoid putting agencies at a disadvantage because they do not have sufficient resources to develop plans, the following is recommended:

- a) Allow MPOs the flexibility to award up to 5% of MPO competition funds to planning projects.
  - b) Revise the application for plans to focus questions on the objective of positioning project sponsors to obtain funds for projects to increase walking and cycling, rather than increasing walking and cycling, which is more appropriate for infrastructure, education and encouragement projects.
- 4) To avoid impacts to project sponsors with a lack of understanding of project eligibility, it is recommended that Caltrans develop a set of "Generally Accepted Design and Cost Standards".

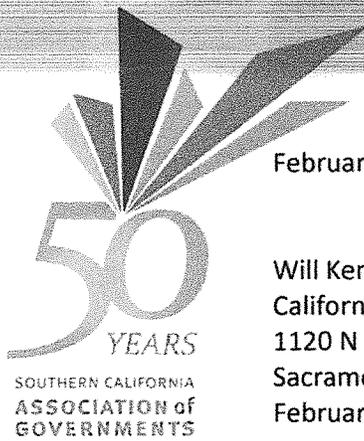
Bus stop seating: bus benches are often used by non-transit pedestrians who need to stop to rest, orient themselves, etc. Bus stop improvement funding is inadequate. Bus patrons are "half pedestrians", as well as being "half transit patrons". Bus stop benches should be eligible for at least 50% ATP funding.

- 5) **Delay Call for Projects 2-4 Months:** There is not sufficient time for the ATP TAC to have a meaningful role in updating the guidelines, and especially the application. It is recommended that the Call for Projects be delayed 2-4 months – this level of delay, which could be incorporated within statutory deadlines, would allow meaningful review of the application, which is needed to remove subjectivity and unnecessary difficulty.

Streamlining the application and instructions: these documents are unnecessarily long, cumbersome, confusing, and difficult. Streamlining them is a high priority. Metro wishes to thank Caltrans for its efforts to establish an online application for Cycle 3. It would save a lot of time, where data sources are known by the state, if they can be incorporated as drop down menus. There should be no more than one application file and one set of instructions. Instructions should be minimal and should in no way add requirements to or conflict with the application – they should only explain it.

Make the scoring for Questions 1, 2, and 4 less subjective: the subjectivity of the current application reduces the State's ability to direct funds toward projects that are meritorious or needy in these areas consistent with State law. For Question 1 regarding walking and cycling increase, the application should include a sample user forecast/model for sponsors to use if they do not have something more appropriate. For Questions 2 and 4, the Safety and Health Questions, there should be a few simple questions with statewide scaled criteria, data available by drop-down menu, and a statewide scaled scoring rubric. No more than ¼ or 1/3 of points should be score on a subjective/narrative basis. The Public Health Alliance for Southern California has developed a Health Disadvantage Index (HDI) that contains several health factor data points for each census tract, statewide. Many of these data points may be suitable for a statewide scaled scoring rubric. Should it not be feasible to incorporate them for Cycle 3, at minimum, the HDI should be a suggested data source featured in the application or instructions.

- 6) Non-Infrastructure projects can be very cost-effective ways to alter peoples' behavior to increase active transportation usage and safety behavior. They have not been scoring as well as they should be, given this fact. To address this concern, the following is recommended:
  - 1) Questions and rubriks need to be updated to optimize scoring outcomes for these projects.
  - 2) Metropolitan Planning Organizations (MPOs) should have flexibility in scoring and awarding non-infrastructure projects.



February 25 2016

Will Kempton  
California Transportation Commission  
1120 N Street, Room 2233 (MS-52)  
Sacramento, CA 95814  
February 24, 2016

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Dear Mr. Kempton,

A handwritten signature in black ink that reads 'Will' followed by a stylized surname.

The Southern California Association of Governments, representing six counties, 191 cities and more than 18 million residents in the Southern California region, is pleased to offer the following recommendations to improve the guidelines and selection process for Cycle 3 of the Active Transportation Program (ATP). We appreciate the commitment and tremendous amount of work completed by the CTC in collaboration with Caltrans over the last two years to select and program more than \$720 million to implement the most critical active transportation safety and encouragement projects across the state. With funding requests for the first two cycles exceeding available revenues by nearly 300% (\$2 billion requested) and collision rates continuing to rise in many areas of the state, there is clearly great demand for active transportation projects that advance the state's safety, mobility, health, and environmental goals. To ensure that the program functions at its highest capability and future projects deliver the maximum benefit, we recommend the following administrative and policy changes:

- 1. Delay adoption of Cycle 3 guidelines to ensure the program guidelines and process facilitate the selection and delivery of a broad spectrum of projects, including non-infrastructure and Safe Routes to School Programs, pursuant to statute.** The guidelines propose adoption of Cycle 3 in March 2016 with the new money programmed for fiscal years 19/20 and 20/21. The four to five-year gap between proposal development and project allocation decreases the deliverability of small-scale projects such as educational programs and planning and risks outdated public outreach conducted for construction projects. The regions are exploring legislative and administrative opportunities to address this challenge in a way that meets diverse needs of our regions. We request delaying the adoption of the Cycle 3 guidelines until May 2016 to facilitate consensus building on this critical issue.
- 2. Promote innovation that will be required to meet statewide goals.** At the foundation of the ATP is the Caltrans goal to triple active transportation trips by 2020. To reach this ambitious goal, innovative and separate/protected infrastructure must be prioritized. With design guidance now included in the

California Highway Design Manual for Class IV facilities, it will be much easier for jurisdictions to construct this critical infrastructure. The unintended consequence of the advanced programming of ATP funding is that the majority of projects designed today using rapidly advancing technologies will not be programmed until Cycle 4, delaying delivering to 2025.

- 3. Increase opportunities within the guidelines and process for the Large MPOs to define Regional Programs and select projects that meet local needs.** The multiple, overlapping components of the ATP (Statewide competition, MPO competition, and Small/Rural competition) provide the framework to ensure the most critical needs in our very diverse regions are being met. The guidelines and selection process should facilitate this needed flexibility. For, example, **MPOs should have the authority to determine the share of the regional program funding that is allocated to planning based on the need in the region.** We propose allowing flexibility to set a funding target of up to 5% for planning projects through the regional program.

We would also look forward to exploring alternative approaches and timelines for program adoption. Providing one month in between the adoption of the statewide program and the deadline for the MPOs to submit their regional programs, while also requiring MPOs to consider all projects not funded by the state, significantly limits the MPO's opportunity to differentiate its program and selection process from the State's. **We would support a longer timeframe between statewide and MPO processes to properly address regional needs.**

- 4. Continue to Prioritize the On-line Application.** We applaud the CTC and Caltrans for aggressively pursuing an on-line application process to reduce the administrative burden of the project selection process. We encourage Caltrans and the CTC to continue to prioritize this important effort.
- 5. Tailor technical assistance to needs of disadvantaged communities.** CTC's proposed modifications to the guidelines seek to address the need for greater flexibility for the role of the TARC. Given the size of the state and diverse needs of disadvantaged communities, including extreme difference between urban and rural geography and poverty, we propose the guidelines also provide greater flexibility for the delivery of technical assistance. A model similar to the Affordable Housing Sustainable Communities program where multiple providers are selected in different areas of the state may be beneficial, or other approaches that leverage resources available through MPOs and RTPAs could be

explored. Technical assistance programs are vital to jurisdictions that lack the resources to apply for funding.

6. **Support Open Street Events.** Under Example Projects, the CTC highlights open streets as a type of education program that is eligible for ATP. The existing language is too narrow and only supports open streets events that promote new infrastructure. There are many examples in Southern California where open streets events have been successfully used to promote walking and biking, not just for a day, but to introduce the broader community to active transportation and promote and develop comfort with walking and biking to transit and other destinations. Please consider modifying the language as follows: Open streets events directly linked to the promotion of new infrastructure project or designed to promote walking and biking on a daily basis.
7. **Allow match to be used to expedite project delivery.** As discussed, SCAG is concerned about the significant delay between program adoption and the funding years for the program. To promote expedited project delivery, we recommend the match requirements be modified to allow project sponsors to expend their match funds prior to allocation. We also recommend that the requirement be removed for project sponsors to concurrently and proportionally expend match funds and ATP funds.
8. **Revise ATP project delivery requirements.** The current ATP project delivery requirements follow the STIP guidelines with the exception that an extension request for project allocation and project award is limited to twelve months. Although ATP projects are in general smaller scale compared to STIP projects, the project delivery requirements are the same as larger scale STIP projects, especially ATP projects with federal funding, and with projects involving utility or storm drain relocation, etc. Such projects are common because many pedestrian and cycling improvements take place on-street. We suggest removing this exception to provide the same flexibility as the existing STIP guidelines.
9. **Keep regional program saving within the region.** For the regional program, MPOs should have the ability to reprogram funds that result from savings or project failures within the regional program. The guidelines allow for the regions to establish a contingency list for the purpose of reprogramming funds as a result of project failures or savings. However, the contingency list can only be used until the next program is adopted. Because the Cycle 4 program will be adopted in April 2019, the contingency list will be invalid before the programming years for almost all of the Cycle 3 projects. **We recommend that**

**the use of the contingency be extended until the end of the programming years of the cycle.**

Again, we appreciate the opportunity to provide comments. If you have any questions, please contact SCAG staff Stephen Patchan, [patchan@scag.ca.gov](mailto:patchan@scag.ca.gov), 213-236-1923.

Sincerely,

A handwritten signature in black ink, appearing to read "Hasan Ikhata". The signature is fluid and cursive, with a large loop at the end.

Hasan Ikhata  
Executive Director  
Southern California Association of Governments



CALAVERAS  
COUNCIL of  
GOVERNMENTS

February 25, 2016

Mr. Will Kempton, Executive Director  
California Transportation Commission  
1120 N Street, Room 2233  
Sacramento, CA 95814

RE: Draft 2017 Active Transportation Program Guidelines

Dear Mr. Kempton:

The Calaveras Council of Governments (CCOG) appreciates the opportunity to review the *Draft 2017 Active Transportation Program Guidelines* prepared by the California Transportation Commission (CTC). The CCOG acknowledges and commends the efforts of CTC staff to solicit and incorporate input, and to continually improve the program.

The CCOG is the Regional Transportation Planning Agency for Calaveras County which coordinates with our partners and communities to optimize the existing and future transportation systems. The CCOG strongly believes in providing access to transportation facilities for all individuals and improving opportunities for active transportation.

The following are our comments focusing on four main areas:

1. Disadvantaged Community Criteria

There are many communities in Calaveras County which do not meet the criteria under Median Household Income, CalEPA, or Student Lunch Program but that do have concentrations of people who are economically disadvantaged. Some of these factors that are not accounted for in the first three criteria are high unemployment, low levels of home ownership, high rent burden, sensitive populations, or low levels of educational attainment.

The CCOG strongly supports the inclusion of alternative quantitative assessments that allow rural and unincorporated areas to demonstrate a project's benefits to economically disadvantaged communities. We also appreciate the consideration of data sources that more accurately reflect smaller geographic areas, such as Census Block Group or Place for Median Household Income.

2. Safety Criteria

The CCOG supports the inclusion of qualitative data regarding safety barriers that deter people from walking/biking. Safety is one of the main concerns and issues deterring individuals in our communities from walking and/or bicycling; therefore, we lack the quantitative data to demonstrate the severity of our safety issues.

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P.O. Box 280

San Andreas CA 95249

209 754-2094

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[www.calacog.org](http://www.calacog.org)

3. Leveraging of Funds

Given the limited funding for rural regions, it is very rare that a project get funded from start to finish under one funding source or cycle. The CCOG works with its member agencies to complete early phases with local and regional funds and develop projects that have the greatest potential to leverage funds. The CCOG would encourage CTC to consider including completion of previous phases of a project using alternative revenue programs as part of leveraging funds.

4. Small Urban and Rural Definitions

Combining rural counties with small urban areas creates a competitive grouping with extensive characteristics, resources and other differences. Rural, specifically frontier counties need their own grouping and funding allocations. Even rural classification combines counties such as Solano with Alpine, Calaveras and the frontier counties. An example is the SNAP Program which identified very small rural counties and recognized that small rural counties were distinct and a subgroup within even rural definitions.

In addition, what an "area" entails should be further defined. It is unclear whether the 5,000 population or less refers to the size of a county or area/town within a county.

Thank you for your consideration of these comments. We look forward to the funding opportunity to enhance walking and bicycling in our region. If there are any questions please contact me at (209) 754-2094 or at [meads@calacog.org](mailto:meads@calacog.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Melissa Eads". The signature is fluid and cursive, with a large loop at the end.

Melissa Eads  
Executive Director



# Fresno Council of Governments

2035 Tulare St., Ste. 201 tel 559-233-4148  
Fresno, California 93721 fax 559-233-9645

[www.fresnocog.org](http://www.fresnocog.org)

February 25, 2016

Mr. Will Kempton  
Executive Director  
California Transportation Commission  
1120 N Street, Mail Station 52  
Sacramento, CA 95814

## **Subject: Fresno COG Comments on the Draft 2017 Active Transportation Program Guidelines**

Dear Mr. Kempton:

Thank you for the opportunity to comment on the California Transportation Commission's (CTC's) Draft 2017 Active Transportation Program (ATP) Guidelines. The Fresno Council of Governments (Fresno COG) appreciates CTC's implementation of the ATP as it has generated several great projects to encourage increased biking and walking, as well as improving the safety and mobility of non-motorized users throughout several areas of Fresno County. Fresno COG believes that many of the proposed revisions to the guidelines will further advance the quality of projects submitted for evaluation.

Fresno COG supports several of CTC's initial recommendations provided in the January 28, 2016 draft guidelines and would like to offer the following comments:

- Fresno COG supports CTC's recommendation to reduce the funding set aside for Active Transportation Plans in predominantly disadvantaged communities from the 3% allocated in Cycle 2 to 2% in Cycle 3 and to phase out this set aside to 1% and then 0% in subsequent cycles. Fresno COG is currently working on implementing our Regional Active Transportation Plan that was awarded during Cycle 1 of the ATP. We look forward to incorporating our member agencies' Active Transportation Plans within our Regional Active Transportation Plan.
- Fresno COG supports the CTC's direction to scale the number of points awarded in relation to the severity of the disadvantaged community affected by the project. The definition for disadvantaged communities should be clarified and there should be an addition to the definition for "severely" disadvantaged (i.e. a community with a median household income (MHI) of less than 60% of the statewide MHI—based on California Water Code Section 13476(j)). Projects that do in fact benefit "severely" disadvantaged communities should be given the highest number of points allocated in the guidelines and then points should be tiered off from there based on the severity of the disadvantaged category. Fresno COG additionally supports the language contained in the draft guidelines that refines and strengthens the data required to support the designation of a community as disadvantaged. We feel these provisions will serve to limit any potential misrepresentation on this issue by project applicants, and will allow all regions in the state to fully share in the benefits of the ATP.
- Fresno COG is aware of potential legislation to delay the adoption of ATP Cycle 3 from April 1, 2017 to April 1, 2019 and we would support such policy. This would keep the ATP and STIP adoptions on different schedules. The funding for Cycle 3 is not available for programming until Fiscal Year 2019/2020. Fresno COG will continue to work with the other regions closely to see what the outcome of this legislation will be and to coordinate the regional timeline accordingly.

City of Clovis  
City of Coalinga  
City of Firebaugh  
City of Fowler  
City of Fresno  
City of Huron  
City of Kerman  
City of Kingsburg  
City of Mendota  
City of Orange Cove  
City of Parlier  
City of Reedley  
City of San Joaquin  
City of Sanger  
City of Selma  
County of Fresno

February 25, 2016  
Mr. Will Kempton

Page 2 of 2

Thank you for your consideration of Fresno COG's comments. If you have any questions about our comments or any other ATP-related issues, please contact Chelsea Gonzales, Senior Regional Planner, at (559) 233-4148 ext. 223.

Sincerely,

A handwritten signature in black ink that reads "Tony Boren". The signature is written in a cursive, flowing style.

Tony Boren  
Executive Director  
Fresno Council of Governments

cc: Ms. Laurie Waters, California Transportation Commission, Associate Deputy Director  
Ms. April Nitsos, Caltrans, Chief, Active Transportation Program and Special Programs  
Mr. Bill Higgins, CalCOG, Executive Director  
Mr. Andrew Chesley, San Joaquin COG, Executive Director  
Mr. Ahron Hakimi, Kern COG, Executive Director  
Ms. Terri King, KCAG, Executive Director  
Ms. Marjie Kirn, MCAG, Executive Director  
Ms. Rosa Park, StanCOG, Executive Director  
Mr. Ted Smalley, TCAG, Executive Director  
Ms. Patricia Taylor, MCTC, Executive Director  
Mr. Sarkes Khachek, SBCAG, RTPA Moderator

**From:** [itown@comcast.net](mailto:itown@comcast.net)  
**To:** [Waters.Laurie@DOT](mailto:Waters.Laurie@DOT)  
**Subject:** Cycle 3 ATP Guidelines  
**Date:** Thursday, February 25, 2016 11:33:41 AM

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Laurie,

Thanks you for the opportunity to provide comments on the draft 2017 ATP Guidelines. DOT and Caltrans staff have done an outstanding job of attempting to balance the diverse constituencies that will be seeking ATP funding in the coming years. In the interests of full disclosure, I serve on the Caltrans Active Transportation Program Technical Advisory Committee, on the Board of Directors of Coastwalk California, and consult for the East Bay Regional Park District. My comments, however, represent my own views and not those of the above-mentioned organizations.

Comments:

#### Disadvantaged Community Points:

The current proposal to continue to offer up to 10 points for projects located within, or shown to be serving disadvantaged communities creates a *preference* for such projects which is not consistent with the legislation. Section 2382 (c) of Chapter 359 of Senate Bill No. 99 states " The guidelines shall include a process to ensure that no less than 25 percent of overall program funds benefit disadvantaged communities during each program cycle." It does not require that projects located in DAC's receive *preference* over those that are not. As we observed in both Cycle 1 and Cycle 2 of the Statewide ATP funding allocations, the addition of 10 points for DAC projects resulted in *preferential* scoring for those projects.

The CTC should consider, as an alternative, a "check off" system, whereby projects that meet the DAC requirements "check off" a box to that effect. Once the projects are scored, (on their merits, not their location) staff can determine whether or not the 25% DAC threshold has been met. If it hasn't been met, the highest-scoring DAC projects that did make the funding cut would "bump" the lowest scoring projects that did. This would eliminate the de facto *preference* for DAC projects in the current scoring system.

#### Non-Infrastructure Projects/Programs

As a matter of good public fiscal policy, it is a good idea to limit one time funding allocations, like ATP funding, to projects that have a fixed beginning and end. Funding ongoing programs with one-time money can create ongoing fiscal liabilities for state or local governments. ATP funding for non-infrastructure projects should be limited to efforts like planning documents or studies that have a fixed beginning and endpoint. I support strong language in the guidelines requiring funding requests for ongoing programs to clearly identify the source of funds that will sustain the program once the ATP funds have been exhausted.

Thank you for the opportunity to make these comments. I know you have a very difficult job in balancing the interests of the diverse stakeholders and interest groups, and appreciate your continued efforts to do so.

Respectfully,

Jim Townsend



# MENDOCINO COUNCIL OF GOVERNMENTS

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PHILLIP J. DOW, EXECUTIVE DIRECTOR

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Transportation Planning: Suite 204  
(707) 234-3434

February 25, 2016

Mr. Bob Alvarado, Chair  
California Transportation Commission  
1120 N Street, MS-52  
Sacramento, CA 95814

RE: 2017 Active Transportation Program (ATP) Guidelines

Dear Chair Alvarado:

I would like you to know that I appreciate the extensive opportunity provided by Deputy Director Janssen and especially Laurie Waters to involve regional agencies and other stakeholders in revision of the Active Transportation Program guidelines for the 2017 cycle. Even though there are bound to be some issues that divide us due to the size and diversity of this state, Commission staff has been respectful of our concerns and encouraged interested parties to collaborate to address our issues as well as those of the Commission.

For the most part, my involvement with the guidelines review concentrated on issues concerning Disadvantaged Communities (DAC). Commission staff's initial proposal to reduce points available for DAC status from ten points to five points was a major concern. Most of the communities in Mendocino County, and in rural areas in general, qualify as disadvantaged communities through criteria used in this program. At the same time, the ATP permits up to five points for leveraging. Since budgets of most entities within disadvantaged communities are likely to reflect the economic constraints of their residents, these very entities are unlikely to be able to provide local funding to leverage ATP funding. If there were to be only five points maximum available and the entity sponsoring the project could not provide a match, then there would be NO advantage in being disadvantaged!

Although Commission staff has yet to finalize the draft guidelines that will be presented to the Commission at the March meeting, my sense is that these new guidelines will address most of my concerns. Even so, there is at least one proposed change of which I continue to disagree. This is:

- A change in qualifying criteria under Disadvantaged Communities that would restrict the use of the 75% threshold of participation in the Free or Reduced Priced Meals Program qualifying criterion so that it would apply only to "Safe Routes to Schools" projects. This criterion is a widely used and accepted indicator of economic health. I see no justification for limiting and linking its use to a specific project type. For rural areas especially, it is sometimes difficult to link specific economic data to specific areas. Limitation of this indicator could inhibit viable applications in rural areas. This is especially so in 'clean air' rural counties where CalEnviroScreen is an unreliable indicator of economic health.



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

February 25, 2016

Mr. Will Kempton, Executive Director  
California Transportation Commission  
1120 N Street, Room 2233  
Sacramento, CA 95814

Ms. Lucetta Dunn, Chair  
California Transportation Commission  
1120 N Street, Room 2233  
Sacramento, CA 95814

**RE: Active Transportation Program – Cycle 3 Guidelines**

Dear Mr. Kempton and Ms. Dunn:

On behalf of the Rural County Representatives of California (RCRC), I write to commend the California Transportation Commission (CTC) staff for their efforts and provide comments for development of the Active Transportation Program (ATP) Cycle 3 program criteria and application process.

RCRC is an association of thirty-five rural California counties and the RCRC Board of Directors is comprised of an elected supervisor from each of those member counties. As you may know, rural county supervisors are extensively involved in transportation-related issues on two primary fronts: 1) Boards of Supervisors oversee public works directors/departments and subsequently help maintain the road network of their respective counties; and, 2) many Supervisors sit as members of Regional Transportation Planning Agencies or Metropolitan Planning Organizations where determining and funding projects are prioritized and developed.

RCRC strongly supports the use of alternative options for identifying a Disadvantaged Community (DAC) including Median Household Income and the National School Lunch Program, but more importantly “Option 4,” which provides small, rural communities the ability to compete as a DAC using other measurable quantitative data. While some participants have voiced an interest in using the CalEnviroScreen tool in a more exclusive way, RCRC reminds you that doing so would effectively exclude 29 counties (primarily in northern California) from having any DACs regardless of the economically distressed communities found in those counties. We have no objections to the modifications made to the Option 4 criteria in the Draft ATP Guidelines dated February 16, 2016 and thank the CTC staff for maintaining this provision.

1215 K Street, Suite 1650, Sacramento, CA 95814 | [www.rcrcnet.org](http://www.rcrcnet.org) | 916.447.4806 | FAX: 916.448.3154

ALPINE AMADOR BUTTE CALAVERAS COLUSA DEL NORTE EL DORADO GLENN HUMBOLDT IMPERIAL INYO LAKE LASSEN MADERA MARIPOSA MENDOCINO MERCED  
MODOC MONO NAPA NEVADA PLACER PLUMAS SAN BENITO SAN LUIS OBISPO SHASTA SIERRA SISKIYOU SUTTER TEHAMA TRINITY TULARE TUOLUMNE YOLO YUBA

Mr. Kempton and Ms. Dunn  
Active Transportation Program – Cycle 3 Guidelines  
February 25, 2016  
Page 2

RCRC continues to have concerns over proposed changes to the current criteria included in the ATP Cycle 1 and Cycle 2 Guidelines, specifically regarding efforts to assign tiered point values associated with the severity of a criterion used to identify a DAC. Assigning point values in such a way may have the effect of further limiting the number of rural communities that are eligible to compete using the available criteria. We urge the CTC to conduct a detailed analysis on the impacts a tiered point system would have on rural applicants and that the analysis is provided to ATP stakeholders before these provisions are implemented.

Thank you for time and consideration of these comments and recommendations. We look forward to working with you and the CTC staff to support development of the ATP Guidelines and Criteria for Cycle 3 of the program. If you should have any questions or concerns, please do not hesitate to contact me directly at (916) 447-4806.

Sincerely,

A handwritten signature in cursive script that reads "Mary Pitto".

MARY PITTO  
Regulatory Affairs Advocate

cc: Members, California Transportation Commission  
Ms. Laurel Janssen, Deputy Director, California Transportation Commission  
Ms. Laurie Waters, Senior Transportation Planner, California Transportation Commission  
Mr. Brian Kelly, Secretary, California Transportation Agency  
Mr. Malcolm Dougherty, Director, California Department of Transportation

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Public Works – Engineering Services Division

February 25, 2016

Attn: Laurie Waters  
California Transportation Commission  
1120 N Street, MS-52  
Sacramento, CA 95814

Re: Comments on the 2017 Active Transportation Program Guidelines

Ms. Waters,

Solano County Public Works Engineering would like to provide the following comments on the Active Transportation Program (ATP) guidelines for the cycle.

First, Solano County recommends that the ATP Guidelines are adjusted to reflect the stated goals of the program with regards to disadvantaged communities. Funding ATP projects in disadvantaged communities is an important piece of the program, and as such part of the California Transportation Committee's (CTC) responsibilities was to ensure that 25% of the funds benefit disadvantaged communities (DACs). However, the scoring for the 2015 ATP cycle gave such a high scoring possibility to programs with DACs that projects without DACs were not competitive in the scoring, and 88% of the statewide and 74% of the small urban and rural funding went to projects in DACs. Solano County Public Works would like to point out this discrepancy between the amount of credit that DACs have received in the scoring verses the stated goals of the CTC, and recommends that a correction to the scoring be applied to allow competitive projects outside of DACs be competitive in the scoring for ATP funding.

The second subject that Solano County Public Works would like to bring up for the 2017 ATP cycle is the lack of credit given to "shovel-ready" projects, or those which have the preliminary engineering and environmental phases cleared. Projects that are shovel-ready can provide a more immediate benefit to local communities as they are able to go to construction upon receiving ATP funding. Furthermore, the funding required to clear the environmental, design, and right-of-way phases provides a greater match for ATP funds, and provides a greater benefit per dollar of ATP funds supplied. As such, Solano County Public Works recommends that there be a consideration for the scheduling and progress of a project, and that those which are shovel-ready are given due credit and consideration.

Solano County Public Works thanks the CTC for its consideration of these comments on the ATP guidelines.

Sincerely,

Nick Burton  
Engineering Services Supervisor

Building & Safety David Cliche Building Official	Planning Services Mike Yankovich Program Manager	Environmental Health Jagjinder Sahota Manager	Administrative Services Suganthi Krishnan Senior Staff Analyst	Public Works Engineering Matt Tuggle Engineering Manager	Public Works Operations Wayne Spencer Operations Manager	Parks Dan Sykes Parks Services Manager
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February 25, 2016

Mr. Will Kempton  
Executive Director  
California Transportation Commission  
1120 N Street, MS-52  
Sacramento, CA 95814

Dear Mr. Kempton,

The Tulare County Association of Governments would like to thank the California Transportation Commission for the opportunity to provide comments on the Draft Active Transportation Program Cycle 3 Guidelines. We would also like to thank the CTC staff for their leadership and dedication in conducting the ATP Cycle 3 workshops.

We are generally in agreement with the version of the Guidelines that have been developed to this point. With respect to disadvantaged communities, we offer the following comments:

- We would like to keep the maximum number of points for disadvantaged communities at 10. We feel it is important to do so in order to help the most disadvantaged communities gain access to ATP funding. In addition, we would be in favor of a point structure that awards more points for communities categorized as “severely disadvantaged”.
- Determining the degree to which a project will benefit a disadvantaged community can be a complex and sometimes controversial process. A potential solution to this would be for the scoring responsibilities for this criteria being shifted from the evaluation committees to the CTC or Caltrans staff. This could help eliminate the potential for differing interpretations of the disadvantaged communities scoring criteria among the many different ATP evaluation teams.

Thank you again for the opportunity to comment on the Draft 2015 ATP Guidelines. Should you have any questions, please feel free to contact Ben Giuliani or Gabriel Gutierrez at (559) 623-0450.

Sincerely,

A handwritten signature in black ink that reads 'Ted Smalley'.

Ted Smalley  
Executive Director

Cc: Laurie Waters, CTC



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](mailto: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.



day one

**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](mailto:jessica@investinginplace.org) with any feedback or questions on this letter.

Sincerely,  
Claire Robinson  
Managing Director  
Amigos de los Rios

Mike and Kayla Kaiser  
Founders  
Bike Car 101

Wes Reutimann  
Project Director  
Bike San Gabriel Valley

Christy Zamani  
Executive Director  
Day One

Hilary Norton  
Executive Director  
FAST - Fixing Angelenos Stuck in Traffic

Jessica Meaney  
Managing Director  
Investing in Place

Tamika Butler  
Executive Director  
Los Angeles County Bicycle Coalition

Deborah Murphy  
Executive Director  
Los Angeles Walks

Anisha Hingorani  
Policy and Program Coordinator  
Multicultural Communities for Mobility

John Ruby  
Activist  
New LA Podcast

Manal Aboelata  
Managing Director  
Prevention Institute

Omar Gomez  
Chair  
San Gabriel Mountains Forever

Sandra McNeill  
Executive Director  
T.R.U.S.T. South Los Angeles

Mary Creasman  
California Director of Government Affairs  
Trust for Public Land

cc:

Laurel Janssen, Deputy Director, California Transportation Commission,  
[laurel.janssen@dot.ca.gov](mailto:laurel.janssen@dot.ca.gov)

April Nitsos, Chief, Office of Active Transportation and Special Programs,  
Division of Local Assistance, Caltrans, [april.nitsos@dot.ca.gov](mailto:april.nitsos@dot.ca.gov)



City of Long Beach  
Department of Health  
and Human Services

Los Angeles County  
Department of Public Health

City of Pasadena  
Public Health Department

County of Riverside  
Department of Public Health

Santa Barbara County  
Public Health Department

County of San Bernardino  
Department of Public Health

County of San Diego  
Health and Human Services  
Agency

Ventura County  
Public Health

February 25, 2016

Laurie Waters  
1120 N Street, MS-52  
Sacramento, CA 95814

Dear California Transportation Commission Members and Staff:

The Public Health Alliance of Southern California (Alliance) is a collaboration of local health departments in Southern California working to create communities where all residents can be healthy and active. Given the important health benefits associated with increased physical activity<sup>1</sup>, and the potential of active transportation to help our population meet Federal physical activity guidelines<sup>2</sup> while accessing essential destinations, Health Departments are supportive of the Active Transportation Program (ATP) and its ongoing funding. Far more projects applied for Active Transportation Program Funding in the previous two cycles than were awarded (estimated 1 billion in funding applications each cycle, with only 360 million funded each cycle). In recognition of the significant public health and greenhouse gas reduction benefits that accrue from active transportation investments, we encourage increased and ongoing investment in the program, including future investment of Greenhouse Gas Reduction fund dollars.

Local Health Departments were pleased to participate in Cycle 1 and 2 of the Active Transportation Program, in partnership with other jurisdictions, as funding applicants, and as reviewers of applications in both the Statewide and the Local funding competitions.

Based on our experience, we have the following recommendations for improving Cycle 3 of the program:

**Prioritize Disadvantaged Communities and the Social Determinants of Health:**

As public health professionals engaged in efforts to reduce the stark disparities in health that exist across California, an important focus of our work is identifying and improving conditions in health disadvantaged communities. Evidence suggests that social factors, which include income, unemployment, education and rent burden are among the most significant drivers of health and wellbeing<sup>3</sup>.

<sup>1</sup> Increasing median time spent walking and biking in the Bay area to 22 minutes carried substantial health improvements, including offer significant co-benefits in terms of health, with projected reductions in cardiovascular disease and diabetes of 14% and 6-7%, respectively, and colon and breast cancer reductions of 5%.

<sup>2</sup> The US Surgeon General recommends 150 minutes of moderate intensity aerobic physical activity each week. <http://health.gov/paguidelines/guidelines/chapter4.aspx>

<sup>3</sup> US Burden of Disease Collaborators. The state of US health, 1990-2010: burden of diseases, injuries, and risk factors. *JAMA*. 2013 Aug 14; 310(6):591-608.

We commend the efforts of CTC staff to have an open discourse about how the Active Transportation Program Guidelines can be adjusted to ensure that disadvantaged communities can share equally in the benefits of the Active Transportation Program and attendant health co-benefits can be targeted to these areas of greatest health need.

- **We strongly support the proposal to award 10 points to disadvantaged communities based on a more rigorous tiered scale.** We recommend that these ten points be awarded as suggested in the letter provided in the SRTS/ Bicycle coalition/ California walks letter to the CTC dated 2/5/16 (refer to Attachment 1, page 6).
- **We recommend that the Free and Reduced Price Lunch standard for identifying disadvantaged communities be allowable *only* for Safe Routes to School Projects directly serving the school used to qualify.** School catchment/attendance area boundaries do not necessarily align with the 2 mile radius currently being proposed. In order to use this criteria the project must be a Safe Routes to School project with infrastructure improvements located within the attendance boundary of the school being used to qualify.
- **We recommend that the disadvantaged community question be the first question on the application.** Applicants claiming points for benefitting disadvantaged communities in the first question should then be required to demonstrate how their project will specifically benefit disadvantaged communities per the criteria in the subsequent application questions. As a guideline for measuring direct benefit, we recommend the framing provided in the SRTS/ Bicycle coalition/ California walks letter to the CTC dated 2/5/16 and attached, which established guidelines for direct benefit (refer to Attachment 1, page 3).

While we expect that the tighter scoring criteria will reduce the chance that communities will be awarded unmerited points in this section, a number of other changes could further ensure that projects optimize benefits to truly disadvantaged communities:

- **Streamline the application and application process.** The labor intensiveness of the current application favors applicants with greater resources/ access to technical assistance. We recommend a simplification of the application, possibly based on the Caltrans Office of Traffic Safety (OTS) Bicycle and Pedestrian Safety Program guidelines as shown in attachment 2. Even the application in its current form could be streamlined by utilizing an online format, with auto-calculator forms for elements of the plan including the disadvantaged community status question. A variety of open source, low cost resources (i.e., Google forms), could be utilized to achieve this result.
- **Invest in Active Transportation Planning in Disadvantaged Communities.** No amount of tweaking and modifying the ATP application process or point allocations will ensure that the projects needed by disadvantaged communities are consistently proposed and awarded in a statewide competition. This is especially true when many disadvantaged communities do not have active transportation plans in place. By encouraging disadvantaged communities to apply for funding to complete active transportation plans, the ATP program will cultivate the future success of active transportation projects in these communities. In support of this, we also recommend returning the funding set-aside for the planning in disadvantaged communities to 3% in the statewide competition, and granting MPOs discretion for awarding up to 5% of regional funds to planning.
- **Dedicate funding for technical assistance to disadvantaged communities.** Funding should be set aside to provide technical assistance to the most disadvantaged jurisdictions (those cities

where the majority of census tracts are the top-most disadvantaged census tracts<sup>4</sup> statewide) to help them successfully complete ATP applications. We recommend that the CTC identify and conduct outreach to these jurisdictions in advance of issuing the call for projects, and work to promote genuine public engagement processes that encourage these jurisdictions to elevate ATP planning and project applications for their disadvantaged community neighborhoods.

- **Consider using the California Health Disadvantage Index as a screening tool for identifying communities most in need of technical assistance.** The California Health Disadvantage Index ranks census tracts statewide based on social determinants of health criteria. We feel that the components of this tool have a direct nexus with the goals of the Active Transportation Program, and would recommend its use as an additional tool for defining disadvantaged communities. More information about this tool is available on the web <http://phasocal.org/ca-hdi/>
- **Remove the stipulation in Section 7 that states that requests for non-infrastructure and planning project funding cannot be combined.** Non-infrastructure Safe Routes to School (SRTS) projects are often an important component of active transportation planning, and can help elevate projects of vital importance from the community level into the type of disadvantaged community-benefitting pipeline described above. Allowing flexibility to applicants to use funding for both planning *and* non-infrastructure acknowledges the important role that SRTS programs play in engaging the community in planning processes.

**Develop a process that is more supportive of non-infrastructure projects:**

Local Health Departments have been longstanding partners in efforts to encourage transportation-related physical activity, partnering with jurisdictions on Safe Routes to School assessments and projects, recommending physical activity as a ‘prescription for health,’ and seeking to help communities with concerns about crime by implementing *Crime Prevention Through Environmental Design* strategies. We see non-infrastructure projects as laying the groundwork for communities where everyone can connect and have access to opportunities by means other than a motorized vehicle while creating a culture of health through active living. As such, the criteria should not only focus on infrastructure, but on developing programming and education to help residents feel safe and connected while walking or biking to destinations.

ATP non-infrastructure grants also help finance the ongoing collaboration of health and planning at a local level, helping not only to increase the effectiveness of active transportation infrastructure improvements, but also to create a broad understanding of how individual transportation choices can improve health.

The structure of ATP Cycles 1-2 has made it difficult for excellent non-infrastructure projects to receive funding. Many of these issues have not been addressed in the Cycle 3 guidelines. The following recommendations are designed to ensure a fairer process for non-infrastructure projects:

- **Develop separate guidelines and application pathway for non-infrastructure and planning projects in ATP.**
- **Make programming to create “a culture of health” around physical activity an eligible program expenditure.**
- **Do not require non-infrastructure projects to demonstrate access to a sustainable funding source. (Section 11, bullet 3)** Many of the non-infrastructure projects will not be able to meet

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<sup>4</sup> Those census tracts meeting the ‘Severely Disadvantaged’ criteria of: <60% MHI, top 15% CES, or top 15% HDI.

this threshold, given that funding for this type of work is generally cobbled together from other (non-ATP) grant sources with clear end dates.

- **Remove the stipulation barring the use of ATP funds to support ongoing efforts. (Section 11, bullet 3).** The goal of non-infrastructure programming should be sustained improvements to active transportation mode share and safety. These types of improvements often require sustained effort and program development over multiple years, however there are few revenue streams available to support successful programs. Rather than barring the possibility of ongoing or repeat funding of the same project, the ATP should support applicants that have the initiative to seek ongoing funding for non-infrastructure project that has demonstrated success in prior cycles.
- Should separate guidelines and application pathways for non-infrastructure and planning projects not be developed, **move the construction readiness element of the tiebreaker criteria, or include an additional criteria that is favorable to non-infrastructure projects so long as infrastructure and non-infrastructure projects continue to compete within the same process. (Section 19)** The current inclusion of construction readiness for infrastructure projects would unfairly favor those projects in a tie situation.

In addition to challenges with the guidelines themselves, the review process for the previous two ATP cycles were unfavorable to non-infrastructure projects. Reviewers often lack the experience/knowledge base to judge non-infrastructure projects, and are not provided adequate guidelines for judging non-infrastructure projects. Establishing a separate review process for non-infrastructure projects, with dedicated reviewers with a background in community engagement and outreach would be helpful in identifying these excellent projects. If dedicated non-infrastructure reviewers are not available, we recommend establishing training for all reviewers designed to provide guidance on non-infrastructure projects. This training should be offered through the Technical Assistance Resource Center and include a primer on the social determinants of health. We would be pleased to participate in/conduct this training.

#### **Recommendation for Question 4: Improved Public Health**

Experience suggests that location within health disadvantaged communities, culturally sensitive project design, and supportive safety/encouragement promotion efforts can help projects optimize public health co-benefits. The public health question is an opportunity for applicants to consider these elements of project design, and to collaborate with public health professionals to maximize their project's health benefit. Our proposed revision to this question is intended to solicit more meaningful responses to this question, while also providing more guidance to applicants. Our revision consists of three parts, each of which would contribute to the question's 10 allowable points: 1) existing health-related disparities (HDI score), 2) projects that are designed to improve conditions that contribute to health and 3) local partnership with public health.

**1) Health-Related Disparities (HDI Score)--5 points** awarded based on project location within, or directly benefiting, census tracts as ranked by their level of community health inequity using the California Health Disadvantage Index. Since its inception, the ATP Guidelines have focused the public health section on "targeting of populations with high risk factors." To make this section easier on applicants and more objective, we strongly support the use of the California Health Disadvantage Index (HDI) (see <http://phasocal.org/ca-hdi/>) for the public health section, which we believe would help prioritize projects that address health disparities. The HDI tool was developed in collaboration with California local

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health departments, and ranks California Census tracts according to public health disadvantage as indicated by the social determinants of health.<sup>5</sup>

We recommend using the ‘directly benefitting’ criteria proposed on pages 3-4 of Attachment 1 2/5/16 letter on Disadvantaged Communities Recommendations. The following tiered structure is proposed (below). Applicants may use the highest HDI score in the project/service area to determine points.

**Table 1: HDI score (percentile ranking) correlated with proposed Question 4 points awarded (out of 5)**

0-25% HDI	25-50% HDI	50-75% HDI	75-85% HDI	85-100% HDI
1	2	3	4	5

**2) Projects that are designed to improve conditions that contribute to health--3 points** for addressing health challenges as determined by HDI component indicators. The HDI has five domains and twenty seven component indicators (list here: <http://phasocal.org/wp-content/uploads/2016/02/HDI-component-indicators.pdf>), including areas such as percent in poverty, no auto ownership, and supermarket access. Applicants must provide a structured response demonstrating how their project will improve these components of public health. One point will be awarded for each separate indicator addressed for a maximum of 3 points.

*Exa ples:*

Indicator	Current % score	How will project improve this health challenge?	Supporting documentation
% in Poverty	XX%	Project will have a local hire policy, requiring 25% of those employed in project construction to live within the highest HDI scored census tract of project.	Upload employment policy document for project
Linguistic Isolation	XX%	Maps, signage, wayfinding materials and project promotion in dominant language(s) for area.	Quantify and justify % of outreach funding allocation for non-English materials.
Supermarket Access	XX%	Demonstrate how project will improve safety, access and convenience of supermarket shopping using active modes.	Map demonstrating improved distance, letter of commitment from store owners regarding safety improvements, evidence of bicycle parking in plan design.
Tree Canopy	XX%	Describe how project design will increase tree canopy and heat mitigation strategies.	Project includes design and funding strategies for tree planting and

<sup>5</sup> More detailed information is available in the report on HDI 1.1, available here: <http://phasocal.org/wp-content/uploads/2016/02/HDI1.1FinalReport2016-01-26.pdf>

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			maintenance incorporating sustainable water provision practices.
Park Access	XX%	Demonstrate how project will improve safe access to parks/ open space.	Maps/photographs illustrating current access challenges and distance, and strategies to address these challenges.

**3) Local Partnership with Public Health: 2 points** for coordination with local health department

- 1 point for inclusion of Crime Prevention for Environmental Design (CPTED) strategies in project design/plan.<sup>6</sup>
- 1 point for demonstrated input/review/support of the application by the local health department.

Perception of safety from violent crime is an important pre-requisite to the use of active transportation modes<sup>7</sup>. We appreciate the ATP program’s commitment to improving safety from accident/collisions, and recommend the use of CPTED criteria as tool for ensuring that projects are also taking violence prevention into account.

The Public Health Alliance of Southern California will be glad to collaborate with staff to develop refined evaluation criteria and reviewer training materials if the CTC decides to adopt this revision to question 4.

**Require applicants to collect data for project evaluation:**

ATP projects represent an important opportunity to fill in some of the gaps in our knowledge about how the built environment can support active transportation. To this point, however, there has been no effort to collect before/after count data of active transportation use to evaluate the effectiveness of project design, and to inform future best practices. We recommend that awarded projects be required to conduct pre/post user counts, and the establishment of technical resources to standardize these counts to the extent possible. The resulting database should be a public resource that informs future grant cycles as well as the broader practice of promoting active transportation.

**Build Evaluation into the ATP:**

We recommend the CTC invest in collecting project results and accomplishments for each cycle in a publicly available evaluation document. We appreciate the components currently collected as per section IX of the Guidelines, however we feel that a more robust accounting of accomplishments would demonstrate the tremendous value being created by the ATP, while also refining future programming cycles for greatest benefit to our state.

<sup>6</sup> As a potential resource to applicants, we recommend the Center for Problem Oriented Policing’s “Using CPTED in Problem Solving”, <http://www.popcenter.org/tools/pdfs/cpted.pdf>. We anticipate the release of further CPTED resources from the SGC’s Health In All Policies Task Force this year.

<sup>7</sup> Loukaitou-Sideris, A. Eck, J.E. (2007). Crime Prevention and Active Living. *American Journal of Health Promotion*, 21(4S), 380-389. Accessed online at: <http://activelivingresearch.org/crime-prevention-and-active-living-0>

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**More constructively include recommendations from the ATP-TAC:**

We commend the formation of the Active Transportation Program Technical Advisory Committee (ATP-TAC), but are concerned that this group's expertise was largely underutilized in the Cycle 3 guideline revision process. While we appreciated the democratic spirit of the ATP Cycle 3 workshops, technological challenges and the complexity of the topics at hand made the workshops a difficult forum for providing feedback. We encourage you to trust in the representative process established through the ATP-TAC, and utilize the significant knowledge base of the ATP-TAC members more effectively in future guideline revision processes.

Thank you for your consideration of our suggestions for the improvement of this important program. We want to reiterate our willingness to partner with the State on the development of public health guidance, criteria, and reviewer training materials for the Active Transportation Program.

Sincerely,



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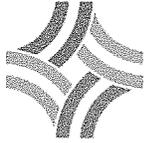
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**SFMTA**  
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**February 25, 2016**

**Will Kempton**  
**Executive Director**  
**California Transportation Commission**  
**1120 N Street, MS-52**  
**Sacramento, CA 95814**

*Attn: Laurie Waters*

**Dear Mr. Kempton:**

The San Francisco Municipal Transportation Agency (SFMTA) and the San Francisco County Transportation Authority (SFCTA) are extremely supportive of the State's Active Transportation Program (ATP). The goals of improving safety while increasing pedestrian and bicycling benefits are of paramount concern to San Francisco. Our Vision Zero program seeks to reduce all traffic fatalities to zero by 2024. As of today we have completed 30 high priority Vision Zero projects and are anticipating an allocation of \$4 million of ATP funds for Vision Zero treatments to the Van Ness Bus Rapid Transit project. During the first two ATP cycles San Francisco has benefited greatly with \$10,128,196 being awarded across six projects sponsored by the SFMTA, Public Works and Department of Public Health. One of SFMTA's staff, Joel Goldberg, is a member of the recently convened ATP Technical Advisory Committee (TAC).

Your staff has been leading a number of workshops across the State in anticipation of ATP Cycle 3. We offer two recommendations to you and your team for Cycle 3:

1. **Reconsider the programming horizon:** Joel and a number of members of the ATP TAC have repeatedly expressed concern about the long planning horizon. This coming summer's grant applications will result in an ATP program being adopted in the spring of 2017. However, we will not see the first half of ATP funding until January 2020 with the second tranche arriving a year later, in 2021, *almost five years from now*. It is somewhat illogical to program funds so far in advance of the funds actually being available. Applications will likely not be as well-conceived (e.g., lacking NEPA clearance and timely community outreach) as those with imminent funding. Our thinking is that Cycle 3 projects that are high priority, reasonably priced, and safety-driven will be completed using alternative funds. If this happens across the State, staffs at sponsor agencies, RTPAs and at CTC will caught up on a statewide reprogramming treadmill.

Because ATP Cycle 3 funds cannot be advanced, the programming capacity is constrained to Fiscal Years 2020 and 2021 no matter when the programming decisions are made; submitting projects for consideration over the next few months will not accelerate their delivery with ATP funds. You may wish to consider a smaller planning and design oriented call for projects that taps into new FAST legislation funds and, two years from now, issue a larger Call for Projects closer to the actual disbursement of funds. This suggestion both honors the Legislative intent of biennial programming cycles while allowing for us to learn from current Cycle 1 and Cycle 2 projects not yet delivered. Ultimately, we will get a better, richer and more thought out array of projects than if we rush to program funds now.

2. Allow for ATP funds to backfill STIP. Current policy regarding supplanting states that “A project that is already fully funded will not be considered for funding in the Active Transportation Program. ATP funds cannot be used to supplant other committed funds.” We recommend that this exception be allowed namely that “ATP funds cannot be used to supplant other committed funds *with the following exception:*

- a. ATP funds can be programmed to backfill State Transportation Improvement Program (STIP) funds, for ATP eligible projects, that were previously programmed but delayed or deleted from the STIP because of reduced Fund Estimates. This exception applies retroactively to projects that received ATP funds from previous cycles.”*

We understand that SFCTA staff is working with your staff to clarify the need and specific language for this revision to be put into play and coordinated with the timing of the 2016 STIP adoption process.

We want to thank you and the CTC for administering such a complex and timely program. Its outcomes will make for safer, healthier multimodal travel here and across the State. If you have any questions about these recommendations, please feel free to call us or our staff, Joel Goldberg (415.701.4499, [joel.goldberg@sfmta.com](mailto:joel.goldberg@sfmta.com)) or Amber Crabbe (415.522.4801, [amber.crabbe@sfcta.org](mailto:amber.crabbe@sfcta.org)).

Sincerely,



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