October 14, 2016

California Transportation Commission
1120 N St, MS-52
Sacramento, CA 95814

Re: Proposed Guidelines for Use of Greenhouse Gas Reduction Funds in the 2017 Active Transportation Program

Dear Commissioners and CTC Staff:

The undersigned organizations have advocated for several state budget cycles to increase funding to the Active Transportation Program (ATP) to enable the Commission to award more grants to great walking and bicycling projects. As you all know well, through the first three cycles of the ATP, many times more projects have applied for funding than can be funded with annual appropriations. Our organizations are pleased that the Legislature and Governor Brown agreed this year to allocate an additional $10 million to the ATP from the Greenhouse Gas Reduction Fund (GGRF), and offer the following comments in support of awarding those funds to Cycle 3 projects:

We support the draft proposal by CTC staff to use this additional $10 million to augment ATP Cycle 3, and award it to project applications already under consideration. Because these funds are appropriated in state fiscal year 2016-17, must be allocated by June 30, 2018, and liquidated by June 30, 2020, it's critical that the funds are awarded expeditiously.

We also support the staff proposal to attempt to award these additional funds first to high-scoring projects within the statewide 50% component of the program. As these are the first GGRF dollars to be appropriated to the ATP they will likely be subject to additional scrutiny by the Legislature, and we believe it's important that they be used to fund projects that are highly effective at achieving all the goals of the program. In particular, to align with statutory goals outlined in AB 1532 and SB 535, ATP projects that receive GGRF should score high on their benefit to disadvantaged communities, ability to increase walking and bicycling, and community engagement and support for the project, as well as on their emissions reduction impact.

We have three concerns about the staff proposal that we believe warrant reconsideration:

1. To meet the GGRF disadvantaged community requirements, we agree with CTC staff's proposal to comply with AB 1550 disadvantaged communities criteria. However, we recommend awarding 100% of these funds to disadvantaged communities to maximize the benefits of these funds in improving public health, air quality, and access to economic opportunity where they are most needed.
2. CTC staff recommends that the GGRF funds be used on infrastructure projects in construction phase, and also on combined infrastructure/non-infrastructure projects. We strongly support this proposal and we recommend that stand-alone non-infrastructure (NI) projects be considered for GGRF funding where they can meet the additional criteria, up to a maximum of 20% of available GGRF funds. NI projects are already eligible for GGRF funding under the Affordable Housing and Sustainable Communities Program, approved by the Air Resources Board. NI projects have

great potential to increase walking and bicycling--therefore reducing greenhouse gas emissions--, generate community engagement and support, and provide unique benefits to disadvantaged communities. They are also generally less costly than infrastructure projects so greater benefits may be achieved with the available funding, and they are often easier to implement quickly, which is critical given the short time period in which these funds must be spent. Safe Routes to School NI projects in particular can help reduce congestion during school drop-off and pick-up times, thereby reducing greenhouse gas emissions and other harmful air pollutants near schools. As these guidelines will likely set a precedent for future GGRF funds flowing to the ATP, we encourage the Commission to make NI projects eligible for up to a maximum of 20% of available GGRF funds.

3. CTC staff recommends that candidates for the GGRF allocation submit supplemental information, including an estimate of greenhouse gas emissions reduced and emissions reduced per project dollar based on the method established by the Air Resources Board (ARB). We support ensuring that these funds are awarded to agencies that can estimate greenhouse gas emissions reduction as a threshold criteria, but we do not support using the emissions data and especially the emissions per project dollar criteria to score and rank eligible projects against each other as such a metric is difficult to accurately verify and easy to manipulate. In addition, using the method proposed by the Air Resources Board that calculates potential emissions reduced based on the number of destinations in proximity of the project will put projects in smaller and more rural jurisdictions at a significant disadvantage. Instead, the project's overall score based on the criteria in the 2016 ATP Guidelines and supplemental project deliverability information should be used to rank projects that meet threshold criteria for GGRF funding.

We have also reviewed the Air Resources Board's Greenhouse Gas Quantification Methodology for the California Transportation Commission Active Transportation Program, and will be submitting similar comments directly to ARB.

Thank you for the opportunity to comment on the Proposed Guidelines for Use of Greenhouse Gas Reduction Funds in the 2017 Active Transportation Program, and for Commission staff's hard work on ATP Cycle 3. Please contact Jeanie Ward-Waller with the California Bicycle Coalition, at jeanie@calbike.org, with any questions.

Sincerely,

Jeanie Ward-Waller, Policy Director
California Bicycle Coalition

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

Kimberly Chen, Government Affairs Manager
California Pan-Ethnic Health Network

Wendy Alfsen, Executive Director
California Walks

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

Joshua Stark, State Policy Director
TransForm

Rico Mastrodonato, Sr Government Relations
Trust for Public Land

Genoveva Islas, Director
Cultiva La Salud

Lisa Hershey, Associate Director
Housing California

Jerard Wright, Policy Analyst
Move LA

Erika Rincón Whitcomb, Senior Policy Associate
PolicyLink

Bill Magavern, Policy Director
Coalition for Clean Air

Chuck Mills, Director of Public Policy & Grants
California ReLeaf

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

TAB 18

October 17, 2016

Ms. Susan Bransen
Executive Director
California Transportation Commission
1120 N Street, MS-52
Sacramento, CA 95814

Re: Proposed Guidelines for Use of Greenouse Gas Reduction Funds in 2017 Active Transportation Program

Dear Ms. Bransen:

Thank you for the opportunity to provide feedback on the Proposed Guidelines for Use of Greenhouse Gas Reduction Funds (GGRF) in the 2017 Active Transportation Program (ATP). The GGRF funds are an exciting opportunity to advance projects that help meet both ATP and greenhouse gas reduction goals. We hope you will take the following comments into consideration when adopting the final program guidelines.

Section V. Project Eligibility, Subsection A. Greenhouse Gas Reductions
The current language refers to only two types of projects for which the Air Resources Board has developed a GHG reduction quantification methodology: paved bicycle paths/lanes and paved pedestrian facilities. The current language also requires that each application provide an estimate of GHG reductions using the quantification methodology developed by the Air Resources Board (ARB) which is currently in draft and subject to change. We suggest revising the language to refer more generally to the ARB quantification methodology so that all the various project types that are eligible for ATP funds (e.g. bike share, bike hubs, roundabouts) are not excluded from this opportunity.

Section VI. Project Selection Process, Subsection D. Submittal of Supplemental Application Material
We suggest making the submittal deadline a postmark rather than a "due by" date. This would be consistent with the ATP Guidelines and create a level playing field for applicants in all areas of the state.

Should you have any questions regarding these comments, please feel free to contact me at (213) 922-3041 or chenp@metro.net.

Sincerely,

Wil Ridder
Executive Officer
Strategic Financial Planning and Programming