



November 14, 2018

Metro Board of Directors
One Gateway Plaza
Los Angeles, CA 90013

OPPOSE: 710-N Funding Reallocation | Draft Funding Recommendations

Dear Chair Fasana, Metro Board Members, and Staff,

As community-based organizations concerned about the health and well-being of residents of the 710-N corridor, we are submitting the below concerns and recommendations regarding

Metro staff's draft recommendations for the first \$415 million in Measure R funding set-aside for the corridor.

The Committee should reject the staff recommendation and direct staff to develop a new list of projects based on criteria that prioritize equitable, healthy, and sustainable mobility for all.

The 2017 Metro Board Motion (Fasana, Barger, Solis, Garcetti, Najarian) **encourages Metro, Caltrans, and the corridor cities to:**

“pursue policies and actions that would promote smart and functional land use, reduce automobile dependency, encourage multi-modal trips, improve traffic operations, and maximize the use of the latest available technologies to enhance performance of the existing transportation system to minimize impacts of the regional traffic on the communities along the SR-710 corridor.”

Yet staff's recommendations do not include a single transit, active transportation, or other TDM project to support multi-modal trips, despite corridor cities submitting over \$420 million in requests in funding for projects with multi-modal benefits (see list of multi-benefit and multi-modal projects at the conclusion of this comment letter).

Concern #1: Public engagement in project selection at the City-level was inadequate.

Some communities like South Pasadena and Pasadena provided multiple public forums for community members to weigh in on potential projects before lists were submitted to Metro, while others like Monterey Park and Alhambra appear not to have hosted public meetings on the matter. Considering the significant impact of this once-in-a-lifetime investment in these communities, and the very real public health, safety, and environmental impacts of the proposed projects, did Metro set a minimum standard for public engagement on project list development?

Recommendation #1: At a minimum corridor cities that did not have public meetings to discuss, solicit feedback on, and refine project 'wish lists' should be directed to host such meetings. Meetings should be broadcast in languages appropriate to the demographics of each community. Meetings should be held during times that working residents and families can attend, with translation services and childcare provided to facilitate participation from as broad a cross section of the public as possible.

Concern #2: The manner in which Metro staff elevated and selected over \$400 million in projects is unclear. The staff report notes that *'Eligible projects were selected based on the current level of traffic impact, the anticipated future traffic conditions, potential benefits gained by implementation of the proposed project(s), and a nexus to the SR-710 freeway gap.'*

However no analysis or detail for how over \$400 million in projects were elevated from the over \$1.2 billion in submitted projects is provided in the staff report.

Metro staff's board report explicitly states that none of the Active Transportation projects were selected at this time, but does not elaborate why. Staff also does not explain why projects that would benefit transit such as bus-only lanes (e.g., the Cities of Los Angeles and San Gabriel submitted proposals for Bus Rapid Transit on Valley Blvd; the City of Los Angeles submitted a proposal for Bus Rapid Transit on Huntington Drive) were not considered at a time when Metro bus ridership and average operating speeds are falling systemwide.

Recommendation #2: Each project should be given a quantitative score based on appropriate criteria. Recommendations should also support the implementation of Metro Board-adopted policy and planning documents including but not limited to the 2018 Equity Platform Framework, 2016 Active Transportation Strategic Plan, and 2012 Bus Rapid Transit Plan. Scoring should account for proposed project impacts to public health, safety, and the environment. The project evaluation panel should include experts in transportation equity, transit, and active transportation.

Concern #3: Project selection appears to be justified on improving “Level of Service (LOS)” metric rather than reducing “Vehicle Miles Traveled (VMT)”, the new statewide standard for planning. In 2017 the Governor’s Office of Planning and Research advised agencies that “each percent increase in lane miles results in a 1.03 percent increase in vehicle travel” (Source: pg. 29 - http://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf).

Recommendation #3: Metro should cease evaluating projects based on Level of Service, an outdated approach that is at odds with Metro’s mission and California’s climate goals. Projects should be evaluated and selected based on their ability to reduce VMT and increase mobility for all by low-carbon means.

Concern #4: Funding totals vary widely across the corridor, with some communities recommended for significantly more funding than others, and one left off the list entirely. How was the relative size of City-level funding awards determined?

Were any of the following factors considered by staff or factored into staff’s funding recommendations?

- Disadvantaged Community status / pollution burden (CalEnviroScreen3.0)
- Population size
- Local rates of traffic injuries/fatalities/collisions
- Number of households without an automobile

Metro Staff Recommended Funding Levels				
City	Funding Total by City, descending	Population	% Households with 1 or no vehicles (0 vehicles)	Cal EnviroScreen 3.0* Average pollution burden
Pasadena	\$105 million	142,000	48% (10%)	40%
Monterey Park	\$91.3 million	61,000	38% (9%)	50%
Alhambra	\$63.5 million	85,000	44% (8%)	70%
South Pasadena	\$48 million	26,000	44% (4%)	15%
San Marino	\$32 million	13,000	20% (4%)	10%
Los Angeles City (El Sereno, H.P., E.R.)	\$22 million		53% (13%) <i>Citywide figures</i>	65%
Los Angeles County (City Terrace)	\$16 million		34% (6%)	95%
San Gabriel	\$13.5 million	40,000	39% (7%)	65%

*CalEnviroScreen, the California Communities Environmental Health Screening Tool, identifies California communities by census tract that are disproportionately burdened by, and vulnerable to, multiple sources of pollution. Version 3.0 was released in January 2017 by the Office of Environmental Health Hazard Assessment (OEHHA), on behalf of the California Environmental Protection Agency (CalEPA). Disadvantaged communities are defined as the top 25% scoring areas from CalEnviroScreen along with other areas with high amounts of pollution and low populations. This means that communities with average pollution burden scores of 75-100%. Across the 710-N corridor four communities have at least some neighborhoods that meet the SB-535 Disadvantaged Community threshold: neighborhoods within the County of Los Angeles (e.g., City Terrace), City of Los Angeles (El Sereno), San Gabriel, and Alhambra (Source: <https://oehha.ca.gov/calenviroscreen/sb535>)

Concern #5: The staff report is silent on the process for selecting projects for the balance of 710-N funding reallocation.

Recommendation #5: Outline the process and timeline for follow-up funding phase(s), and share with the public, key stakeholders, and corridor cities.

Recognizing the historic nature of the transportation investment being considered for these local communities, the undersigned organizations request that Metro address these questions and concerns before authorizing almost half-a-billion dollars in transportation funding for the 710-N corridor.

Thank you for your time and consideration of these issues,

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City-Submitted Projects with Multi-Modal Benefit NOT Recommended for Funding

All projects listed below were pulled from the 11/14/18 Metro Ad Hoc Highway Committee Meeting Agenda Packet.

- **Alhambra**
 - Metro Gold Line Shuttle - TBD
 - Bike Plan Implementation Project [Citywide] - \$500,000
- **Los Angeles City**
 - Modal Connectivity - EV Car Share [Northeast LA] - \$5,000,000
 - Modal Connectivity - First/Last Mile Improvements - \$20,000,000
 - DASH El Sereno / City Terrace Community Route Improvements - \$6,500,000
 - DASH Highland Park / Eagle Rock Community Route Improvements - \$6,000,000
 - Eastern Avenue Multi-Modal Transportation Improvements - \$15,000,000
 - Eagle Rock Boulevard Multi-Modal Transportation Improvements - \$15,000,000

- Huntington Drive Bus Rapid Transit [BRT] - \$35,000,000
 - Valley Boulevard Bus Rapid Transit [BRT] - \$21,500,000
 - Modal Connectivity - Bike Share [Northeast LA] - \$3,000,000
 - El Sereno ATP and Transit-Connectivity Enhancements - \$10,000,000
- **Los Angeles County**
 - El Sol Shuttle Service [w/Zero Emissions (ZE) Vehicles] - \$30,000,000
 - Upgrade Existing El Sol Shuttle buses to ZE vehicles - \$26,000,000
 - El Sol Free Riding Program - \$300,000
 - East Los Angeles Bike Share - \$600,000
- **Pasadena**
 - Pasadena Avenue/St. Johns Avenue Complete Streets - \$15,000,000
 - Allen Avenue Complete Streets - \$1,500,000
 - Hill Avenue Complete Streets - \$1,500,000
 - Avenue 64 Complete Streets - \$2,000,000
 - Rapid Bus Improvements - \$10,000,000
 - Student Transit Passes - \$200,000
 - Electric Transit Vehicles - \$28,000,000
 - Bicycle Transportation Action Plan Projects - \$5,000,000
 - The Arroyo Link - Multi-Use Path - \$2,000,000
 - Mobility Hubs - \$10,000,000
- **San Gabriel**
 - Transit Service to Light Rail - \$500,000
 - Local Circulator Bus Service - \$1,000,000
 - First-mile/last mile improvements - \$2,000,000
 - Valley Boulevard Corridor Bus Rapid Transit [BRT]- \$59,100,000
 - Multimodal Transit Center and Parking Structure - \$24,000,000
 - Citywide Bicycle Facilities - \$35,000,000
- **San Marino**
 - Del Mar Avenue Complete Street Improvements - \$2,000,000
 - Huntington Drive Complete Street Improvements - \$2,000,000