

November 20, 2013

Andre Boutros, Executive Director
James C. Ghielmetti, Chair
California Transportation Commission
1120 N Street, Room 2221 (MS-52)
Sacramento, CA 95814

Active Transportation Program Guidelines Recommendations

Dear Executive Director Boutros and Chairman Ghielmetti,

We appreciate the work of the California Transportation Commission and Caltrans staff on quickly establishing a stakeholder input process for the Active Transportation Program (ATP) Guidelines and laying out a timeline for drafting, review, and adoption of the Guidelines. We understand that consolidating several programs with unique needs and constituencies into a single program with limited funds is a significant challenge. However, the creation of the ATP also provides a unique opportunity to transform how the state funds and implements walking and bicycling as key components of the transportation system. Engaging a stakeholder dialogue is a great first step.

Our coalition of active transportation, trails, conservation, health and equity organizations worked collaboratively through the legislative process with Administration and Legislative staff to ensure that Senate Bill 99 addressed the concerns of a wide variety of stakeholders and disadvantaged communities. We continue to work together to represent the interests of our constituencies in

the ATP Work Group meetings, and have developed the following summary recommendations on key issues to be addressed in the guidelines. Please consider the following:

1. Process for Guidelines Development

Senate Bill 99 required that the guidelines be developed “in consultation with the Active Transportation Program Workgroup, which shall be formed for the purposes of providing guidance.” The five ATP workgroup meetings held in October and November have been a venue for wide-ranging input from the attendees in each meeting, but have not fostered clear direction and guidance on key issues. Few stakeholders have been able to attend every meeting and weigh in on all of the essential elements, many covered in only a single meeting. Representatives of our coalition who participated in the legislative working group in July and August recommend convening a smaller multi-disciplinary committee to help sort through the input and make recommendations on draft language and any additions to be incorporated into the Guidelines. Representatives invited to participate from state, regional, and local agencies, and non-governmental organizations with expertise in the various project types as well as public health and equity, would create a balanced representative advisory group.

2. Disadvantaged Communities

The discussion of qualifying criteria for the disadvantaged community funding floor appeared on the agenda for only the first workgroup meeting on October 8. This topic requires further detailed discussion on the performance and geographic coverage of potential metrics. We would not object to a procedure allowing MPOs to choose from a menu of defined, specific definitions developed by the CTC in collaboration with key stakeholders in order to meet the statewide equity goal using consistent metrics. We would not recommend allowing the MPOs to establish definitions outside of the statewide menu. The twenty-five percent funding floor for disadvantaged communities should be met in the statewide as well as in each MPO/rural share of the funds, as you have proposed.

In addition, other provisions and exemptions are recommended for disadvantaged communities, such as technical assistance and planning resources, or exemptions from planning requirements (if no resources), to ensure those communities are competitive in the first funding round and beyond. A percentage of funds should be set-aside in the first ATP programming cycle for planning assistance to disadvantaged communities to ensure that they have the capacity to compete for construction grants in future cycles. If planning assistance is not provided in the first round, these communities will fall even further behind in their ability to compete for grants. We agree with the suggestion put forward in the working group meetings that any local match requirement should be waived for projects in disadvantaged communities.

We recommend that the CTC convene a separate sub-workgroup to determine the best approach to defining disadvantaged communities and scoring applications that qualify as serving disadvantaged communities. Staff from CalEPA in the Office of Environmental Health Hazards

Assessment, CA Department of Public Health staff from the Office of Health Equity and the Safe Routes to School Technical Assistance Resource Center (TARC), and other agency and non-profit experts, should be included in the sub-workgroup.

3. Application Requirements & Project Selection Criteria

We understand that the CTC will convene a sub-workgroup to discuss planning requirements for application eligibility. A number of other selection criteria were considered in the workgroup meetings to date, and we recommend that the final criteria be chosen and weighted with achievement of the overall program goals in mind. Several of our organizations will submit specific recommendations for criteria to incentivize good projects from the various categories of project types.

As priority criteria, our coalition recommends the following three primary focus areas:

- A. *Public Engagement* - Was the project developed through a process of strong public participation? Community engagement should be required for development of an application, and exceptional levels of community engagement should be awarded with additional points in project scoring. Community engagement undertaken as part of a previously-adopted plan that led to the project application can satisfy the requirement, as long as the community was also involved in prioritizing the projects within the plan.
- B. *Improvement for Safety and Public Health* - How does the project improve conditions (including safety and public health) for people already walking/bicycling? Project applications should clearly describe who is currently using the facility, the safety risks identified in the project area, and how the project will alleviate those risks. In addition, the project application should explain how the public health of the community will be improved by the project.
- C. *Increasing Bicycling and Walking* - How does the project encourage more people to walk and bike? Project applications should clearly describe how the project improvements will encourage additional users of the facility by connecting multiple destinations, alleviating risks and gaps in a network, providing education and encouragement activities, etc.

4. Project Evaluation Requirements

It is important to have strong data-driven performance measures to ensure projects address the program goals. Project reporting should be required for all projects, but in some cases could be qualitative, such as for smaller projects and disadvantaged communities that may have fewer resources and capacity for data collection and reporting. Reporting/evaluation requirements should be more stringent for larger projects. We recommend that the CTC set up a post-project survey to streamline reporting efforts.

5. Project Selection Process

With regards to the process of project selection, we recommend that the ATP Advisory Committee be the lead in selecting projects. The selection process should be transparent [and include an element where the public can weigh in]. Nonprofit representatives should be on the ATP Advisory Committee responsible for scoring and recommending applications for selection, in addition to state agency staff. Similar project types and projects of similar size should be grouped together for comparison, and then evaluated by experts in those particular project types. We agree that conflict of interest precludes applicants or recipients from reviewing competing project applications.

6. Distribution of Federal & State Funds

Due to the additional work required by the federal-aid process, we agree with the recommendation put forth by CTC staff during the workgroup meetings that the state dollars be reserved for smaller dollar projects and the federal funds directed to the larger projects. This will enable smaller projects to be delivered on a quicker timeline and demonstrate early project delivery success for the program.

7. Project Delivery

We recommend that Caltrans and the CTC make a focused effort to direct technical assistance to jurisdictions that are struggling to deliver projects. Prior to the first funding cycle, the CTC and Caltrans should set a goal to help applicants deliver 100% of ATP funds.

8. MPO Competitive Shares

Regarding the flexibility that MPOs will have over the criteria for their funding decisions, we recognize the value of MPOs selecting projects based on regionally-identified priorities. However, we recommend that MPOs be required to adhere to statewide standards on several items.

First, we recommend that MPOs not have the flexibility to focus on funding only one type of project, and instead that each regional program address a spectrum of project types. We recommend that the CTC require MPOs to establish standing regional ATP advisory committees to review project applications, make recommendations for selection, and continue to advise the MPO on program implementation. Finally, we agree with the CTC staff recommendation that local agencies submit individual project applications to either the state or the MPO competitions in each funding round rather than allowing jurisdictions to submit the same application to both competitions simultaneously, as that would undermine the efficiency of the consolidated program.

9. Local Match Requirements

We recommend waiving the requirement for local matching dollars for disadvantaged

communities or for projects under \$1 million. For projects over \$1 million, we recommend requiring a percentage match from local funds or awarding extra points to applications that include matching funds. More points could be awarded for a greater percentage of local matching funds.

10. Eligible Entities

Non-profits should be eligible as lead applicants for active transportation projects that integrate natural or recreational resources into the project (i.e. parks and recreational trails). Non-profits should be eligible as co-lead applicants for all other project types, except where prohibited by federal law.

11. Schedule for Project Cycles

Smaller projects that are a high priority for communities benefit from an annual call for projects to maintain the community engagement throughout the planning and implementation phases. Safe Routes to School projects provide a good example. Parents and community members are committed to correcting a safety issue within the timeline that their children attend a particular school. Therefore, we recommend an annual statewide call for projects for at least a portion of the ATP funds, with a focus on programming those projects that garner greater community-level engagement.

12. Non-Infrastructure Eligibility

Eligibility for non-infrastructure education, encouragement, and enforcement programs was not limited by Senate Bill 99 to only Safe Routes to School projects within the \$7 million set-aside. Therefore, we recommend that the CTC make clear in the guidelines that non-infrastructure programs in addition to Safe Routes to School programs are eligible to compete for all shares of funding.

Thank you for this opportunity to submit recommendations. The Active Transportation Program represents a significant shift in California's transportation policy and an opportunity to blaze a trail nationally for improved pedestrian and bicycle transportation within a multi-modal system. We will continue to work with the Commission and Caltrans to ensure that the ATP meets the ambitious goals laid out in Senate Bill 99.

Sincerely,

Jeanie Ward-Waller, California Advocacy Organizer
Safe Routes to School National Partnership

Wendy Alfsen, Executive Director
California WALKS

Laura Cohen, Western Region Director
Rails-to-Trails Conservancy

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November 6, 2013

Mitchell Weiss
Deputy Director
California Transportation Commission
1120 N Street, Room 2221 (MS-52)
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Dear Mr. Weiss:

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On behalf of the Rural Counties Task Force, I want to thank you for your leadership in conducting the Active Transportation Program (ATP) workgroup meetings and for inviting our participation and input on the ATP guidelines.

In response to your invitation, I am writing to offer our specific suggestions and recommendations. These recommendations based on the following objectives:

- Make the process as simple as possible for project applicants and advocates. Allow a single application to qualify a project for consideration of funding from any of the various ATP "pots" of funding for which the project may qualify. One of the purposes of SB 99's consolidation of programs was to avoid the need to choose from or make multiple applications for programs with overlapping goals and eligibility.
- Make the evaluation and programming process as simple as possible, minimizing the evaluation workload while allowing for consideration of project funding from multiple sources.
- Honor regional priorities, consistent with program goals. Projects should be selected that are consistent with an agency's Regional Transportation Plan goals and policies, and where applicable, the Sustainable Communities Strategy. This approach would also support the CTC's STIP Guidelines and ensure equivalent public involvement.
- Assure program compliance with all funding mandates and constraints.
- Assure the full and most effective use of program funds.
- Define the mandate for serving disadvantaged communities in a way that is consistent with the intent of statute, is simple to measure and report in terms of readily available data, and allows for application throughout the state.

We start from the assumption that the CTC may break down the overall ATP into at least the following 13 distinct shares:

- Nine shares, one for each of the nine large MPOs. Together these make up 40% of the program. Projects for each of these shares are to be selected by the MPO in consultation with Caltrans and the CTC.
- One share, 10% of the program, for the rural and small urban areas of the state outside the nine large MPOs. Projects are to be competitively awarded to projects in those areas by the CTC.
- One share, at \$24 million per year, for Safe Routes to Schools. Projects are to be competitively awarded to qualifying projects by the CTC.

- One share, at about \$2.3 million per year, for Recreational Trails projects. Projects are to be selected by the CTC in collaboration with the state Department of Parks and Recreation.
- The remaining share, about 29% of the total program, be competitively awarded by the CTC for projects in the state – this includes projects in large urban, small urban and rural areas, as well as projects that serve schools and recreational trails.

Safety. Highlight the importance of performance criteria aligned with the Strategic Highway Safety Plan to select ATP projects that improve safety.

Disadvantaged Communities. We support the concept articulated in the workgroup meetings that the 25% mandate for serving disadvantaged communities should be applied to each of the program shares, including Safe Routes to Schools. We do believe an exception may need to be made for the Recreational Trails share, given its small size and the nature of that subprogram.

For the purposes of the program mandate, the definition of disadvantaged communities should be specific and as simple as possible to identify and report. We suggest that a project be counted toward meeting the mandate if it serves at least one of the following:

- A school where at least 75% of students are eligible to receive free or reduced-price meals under the National School Lunch Program. Eligibility data for individual schools are available from the website of the California Department of Education, <http://www.cde.ca.gov/ds/sd/sd/filessp.asp>.
- An area identified as among the most disadvantaged 10% in the state according to the CalEnviroScreen 1.1 scores. These scores are listed and individually mapped on the website of the state Office of Environmental Health Hazard Assessment (OEHHA), <http://oehha.ca.gov/ej/ces11.html>.
- An area with a Median Household Income (MHI) that is less than 80% of the statewide MHI (currently, 80% of \$61,632=\$49,305). The MHI data should come from the latest American Community Survey (ACS) 5-year data. Excel files of these data by zip code, county, city, and census designated place are available through the website of the state census data center: http://www.dof.ca.gov/research/demographic/state_census_data_center/american_community_survey/#ACS2011x5. Updated data are released each December.
- No existing active transportation facilities, or other modes, precluding the community access to employment, health and educational services.

Criteria and Evaluations. The program guidelines should establish and define general evaluation criteria and perhaps special criteria for subprograms or shares. However, we strongly urge that the guidelines not attempt to dictate the precise evaluation methodology to be used, as by assigning specific points and weights to individual criteria. Instead, the guidelines should focus on ordinal priority setting by multiple evaluation teams for the various shares. Mandated point and weighting systems can be easily manipulated. Even without conscious manipulation, evaluations made by different evaluation teams using a given point and weight system will produce different results and not necessarily be consistent.

We support allowing each evaluation team to develop its own precise methodology using the general criteria specified in statute and the guidelines. In the case of Safe Routes to Schools and Recreational Trails, this may allow for a process that is more familiar from past evaluations. In the case of MPOs, this would be consistent with the provision of statute that allows for an MPO to establish its own evaluation criteria, subject to approval by the CTC.

Staged Evaluation. We recommend a staged evaluation process that would be a variation on the sequential selection process discussed in the workgroup meetings. The intent would be to (1) maximize project selection opportunities for project applicants and advocates, (2) provide full opportunity for consideration of regional priorities, and (3) keep the evaluation timeline and workload manageable.

Under this proposal, there would be an initial evaluation stage with 12 separate concurrent evaluations resulting in 12 different project lists, one for each of the nine large MPOs, and one each for the areas outside the large MPOs, for Safe Routes to Schools, and for Recreational Trails. Each of the 12 evaluations would be conducted by a different evaluation team. There would need to be some initial screening to identify projects eligible for consideration for Safe Routes to Schools and Recreational Trails. This could come from self-identification by the applicant but in any case should be verified by the CTC or Caltrans. Once so identified, a project application could be placed into consideration for two different project evaluations at the same time. For example, a Safe Routes to Schools project might be considered for evaluation and selection from both the Safe Routes to Schools list and from either the MPO or the 10% list.

We propose that each of the 12 concurrent evaluations result in a priority list of up to 150-200% of the identified funding share for that area or subprogram. Each list would designate projects to be funded at a 100% funding level and priorities for additional funding above that level.

These 12 priority lists would then be forwarded to the CTC, and the CTC would develop a comprehensive program from the projects in the initial priority lists. The CTC staff would present to the Commission a proposed program of projects that includes all eligible projects proposed through the initial evaluations at the 100% of share level plus an additional selection of projects. The recommended program would take into consideration the priorities identified in the initial evaluations, a statewide evaluation of priorities across areas and subprograms, project scheduling and deliverability, availability of funding by year, and compliance with all program and funding mandates and constraints.

Selection Committee(s) Membership. We propose rural participation in the selection committee(s). Members of the committee(s) would not evaluate projects from their jurisdiction.

Project Deliverability. There is one potentially critical criterion that seems to be missing so far from the discussion of evaluation criteria and that is project readiness, or the ability of an applicant to deliver the proposed project. The program guidelines should recognize this in some way. There is no point in programming funds for a project, no matter how well it meets other criteria, if the project applicant is not able, for whatever reason, to deliver it within the programming timeframe.

State Only Funding. Establish a dollar threshold for smaller projects to be programmed with state funds. Focus use of federal funds on larger projects that will most likely already be federalized.

Geographic Distribution. For the 10% share to rural and small urban areas in the state, other than the nine large MPOs, we recommend that geographic distribution be added as a criterion for evaluation. We do not advocate that this be defined in any more specific terms, as by a formula or maximum. We do believe, however, that the evaluation for this share should be permitted to take geographic distribution into account.

Supplanting of other funds. We note that there has been some discussion of a guideline that would preclude the supplanting of other funds for a project. We understand that there is reason to preclude the supplanting of funds committed to a project already under award or contract. However, we do not see the need to preclude the use of ATP funds for a future project that may have been scheduled for

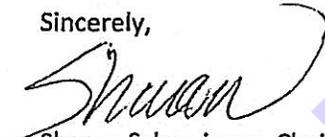
local funding. We suggest, that for the first round, agencies that have projects selected that supplant funds, use an equivalent amount of supplanted funds for projects in their region that meet Active Transportation Program criteria.

Process Timeline. For the initial two-year cycle, the timeline might look like this:

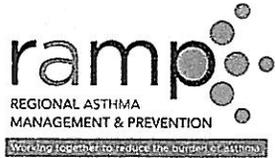
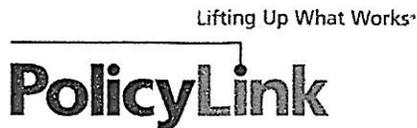
- March 20, 2014. CTC adopts the initial ATP guidelines and the ATP fund estimate for the initial cycle.
- June 1, 2014. All applications due, with copies to the CTC, Caltrans, and the MPO or regional agency. CTC or Caltrans would identify potential eligibility for Safe Routes to Schools and Recreational Trails.
- August 1, 2014. All initial evaluations and priority lists to be completed and submitted to the CTC. These initial evaluations and lists would be prepared by the MPOs and by separate evaluation teams nominated by the CTC for the 10% share, for Safe Routes to Schools, and Recreational Trails. The Recreational Trails evaluation and list would be prepared by or in conjunction with the Department of Parks and Recreation. CTC staff to publish its recommendation for the full program.
- September 19, 2014. CTC adoption of the program.

Thank you for your consideration of these comments and suggestions. I look forward to our meeting Friday to explore these and other ATP questions together at greater length.

Sincerely,



Sharon Scherzinger, Chair



November 22, 2013

Andre Boutros, Executive Director
James C. Ghielmetti, Chair
California Transportation Commission
1120 N Street, Room 2221 (MS-52)
Sacramento, CA 95814

RE: Recommendations for Addressing Disadvantaged Communities in Active Transportation Program (ATP) Guidelines

Dear Executive Director Boutros and Chairman Ghielmetti,

On behalf of the undersigned organizations, we thank the California Transportation Commission (CTC) and the California Department of Transportation (Caltrans) for your leadership in the implementation of the Active Transportation Program (ATP) as a comprehensive, statewide commitment to expand safe and active travel—especially for disadvantaged communities, schools, and residents—and achieve California’s climate and public health goals. We also thank you for this opportunity to submit recommendations for the ATP guidelines as the implementation process for this program moves forward.

As organizations that work to improve health and increase access to opportunity among California’s most vulnerable communities, we commend the Governor, the California State Transportation Agency, and the State legislature for recognizing the importance of prioritizing equity within the ATP and requiring that no less than 25 percent of ATP funds flow to disadvantaged communities, as outlined in Senate Bill 99. By addressing the longstanding infrastructure disparities faced by disadvantaged communities, we can ensure that all Californians are able to safely walk and bicycle to schools, jobs, services and other community assets, thus improving public health outcomes, reducing greenhouse gas emissions, and creating safer and healthier neighborhoods throughout the state.

In order to effectively implement the ATP in a manner consistent with the intent of SB 99 and ensure that disadvantaged communities fully share in the benefits of the program, it is important that the ATP guidelines and implementation procedures contain clear and direct language regarding the application and selection process for projects serving disadvantaged communities. Below are our specific recommendations to facilitate the prioritization of disadvantaged, vulnerable communities and maximize the program’s public health, climate, and safety outcomes.

- **Clarify that each metropolitan planning organization (MPO) is required to award no less than 25 percent of its share of ATP funds to projects specifically targeting and benefitting disadvantaged communities.**

The plain language of SB 99 states that “no less than 25 percent of overall program funds benefit disadvantaged communities” (emphasis added). While the language does not explicitly require the regional programs to help meet the 25 percent disadvantaged communities target, the wording—and discussions with the Administration and Legislature during the drafting of the legislation—strongly signal that the legislative intent was for both the state and regional programs to invest in disadvantaged communities. In other words, the “overall program” encompasses both the state and regional programs, and as such, the 25 percent disadvantaged communities target applies to both the state and regional programs. Moreover, if the state program awards its projects before the regions do—as has been discussed in the workgroup meetings—it will be difficult for the CTC to ensure that the minimum 25 percent of overall program funds benefits disadvantaged communities without requiring that each regional program also set a 25 percent target as the floor for funding projects in disadvantaged communities. We recommend that the CTC establish guidelines that clarify that: 1) the 25 percent target for investment in disadvantaged communities applies to both the state and regional programs, and 2) the 25 percent target is a minimum funding floor—not a ceiling—for investing in projects that benefit disadvantaged communities.

- **Require applicants to select from a defined menu of options for designating disadvantaged communities established by the CTC.**

In identifying disadvantaged communities, it is important for potential applicants and MPOs to utilize a comprehensive and accurate definition that best captures the relative environmental, health, and safety disparities experienced by communities across California. While we recognize the need for some leeway in how regions define disadvantaged communities, for the purposes of maintaining statewide consistency within the program, we strongly recommend that potential applicants be required to choose a definition from a defined menu of options. The ATP guidelines should direct applicants to choose from the following menu of definitions in identifying disadvantaged communities or schools:

- For projects under the statewide competitive program:
 - Communities identified in the top tier (highest scoring) of the California Office of Environmental Health Hazard Assessment's California Communities Environmental Health Screening Tool (CalEnviroScreen), as defined for SB 535; OR
 - Communities that can demonstrate their median household income (MHI), at the block group or census tract level, to be at or below 80% of the statewide median income.
- For projects under the regional programs:
 - Communities identified in the top tier (highest scoring) of the California Office of Environmental Health Hazard Assessment's CalEnviroScreen; OR
 - Communities previously identified in a Regional Transportation Plan as an “environmental justice community,” “community of concern,” “vulnerable population,” or other designation per federal Title VI obligations; OR
 - Communities that can demonstrate their MHI to be at or below 80% of the statewide median income.
- For the purposes of all Safe Routes to School projects:
 - A school in which 75 percent or more of the children are eligible for the free or reduced meal program.

This menu of options represents a reasonable and implementable approach for both the state and the MPOs. For the state share of the program, the CalEnviroScreen tool is the most appropriate because it conducts a comprehensive assessment of community health and environmental conditions across the entire state at the zip

code level. However, we recognize that the exclusive reliance on the CalEnviroScreen tool could inadvertently exclude some areas of high poverty, such as certain unincorporated communities within the San Joaquin or Coachella Valley, due to the methodology's data gaps among smaller communities. Accordingly, we recommend that potential applicants to the state program may utilize a median household income indicator of at or below 80 percent of the statewide median income to define disadvantaged communities.

For the regional programs, we recognize that the CalEnviroScreen tool may not be the right fit. Accordingly, we recommend that MPOs may use their own definition of disadvantaged communities as defined in their adopted Regional Transportation Plans (RTP). Many regions have already established their own definitions to identify vulnerable areas per federal Title VI obligations, and in certain instances, these definitions may be more applicable for identifying and targeting funding to disadvantaged communities within that particular region. Though regional definitions of disadvantaged communities may be termed differently—for example, “environmental justice communities” (as in Fresno COG’s RTP) or “community of concern” (as in MTC/ABAG’s RTP)—our underlying recommendation remains the same: allow regions to use definitions developed within adopted RTPs to meet federal Title VI obligations. Moreover, these regional definitions have already been vetted through a public process in the adoption of a RTP. Again, if neither the CalEnviroScreen nor a regional Title VI community definition works for a project sponsor, we recommend the ability to utilize a MHI indicator of at or below 80 percent of the statewide median income to define disadvantaged communities.

Lastly, for Safe Routes to Schools projects, disadvantaged school communities should be defined as a school in which 75 percent or more of the children are eligible for the free and reduced meal program. This has been a longstanding definition that has worked for the former state Safe Routes to School program that should be continued.

- **Require applicants to thoroughly explain how projects will serve and benefit disadvantaged communities.** To maximize the benefits of prioritizing California’s most underserved communities, applicants should be required to thoroughly demonstrate how their project will directly serve and benefit disadvantaged communities. The CTC should incorporate comprehensive questions that provide for detailed responses to determine project eligibility and selection for ATP funding that is allocated to disadvantaged communities. This will not only allow for more complete information of how projects will benefit disadvantaged communities, it will offer clarity to potential applicants regarding what it means for projects to benefit and serve these communities, and it will also enable the CTC and MPOs to better evaluate and compare how projects will impact targeted communities. We recommend that the following language—based on the Strategic Growth Council’s Planning Grant Guidelines and the California State Parks’ Statewide Park Development and Community Revitalization Application Guide—be incorporated into the guidelines in determining the eligibility and selection of projects.

Projects must specifically target and benefit disadvantaged communities. Please demonstrate how the proposed project takes into consideration the needs of the most vulnerable residents in the community by answering the following:

- What infrastructure, safety, or public health challenges are present within the disadvantaged community that contributes to the need for improvements in walking and/or bicycling infrastructure?
- Describe how the project will address these challenges and improve access to high quality active transportation for the most vulnerable residents, including youth, seniors, and low-income families?
- How will low-income residents of disadvantaged communities have daily access to the project site? Please discuss potential barriers to access such as proximity of the disadvantaged community(ies) to the project site, connections to transportation hubs, health care providers, schools, community centers,

parks or other community amenities and services, or other outstanding safety concerns (for example, passing through a known area of gang violence, large number of stray dogs, etc.) and why these will not prevent access to active transportation improvements for low-income residents living in disadvantaged communities.

- **Require community resident participation in the planning and design of active transportation projects.**

The overall success and safety of active transportation improvements is largely dependent on the extent that projects meet the needs of the community residents and expand public access and use. A critical and effective strategy for achieving this is the participation of community residents in the planning and design of projects. This will advance community-informed projects that will better ensure the safe public use of new walking and biking infrastructure. In alignment with this objective, many programs in California, including the Strategic Growth Council's Planning Grant program and the California State Parks' Statewide Park Development and Community Revitalization program, require the participation of community residents and partners in the planning and design of projects. We strongly recommend that the ATP aligns with similar requirements and directs applicants to implement community-based planning processes. To evaluate this criterion for projects, the following questions should be included in the guidelines to determine project eligibility and selection:

Discuss how the disadvantaged community has been and will continue to be engaged in the development of the proposal and the execution of the active transportation project.

- Please describe how the applicant or partnering community-based organization (CBO) made efforts to meet with residents (for Safe Routes to Schools projects, this includes parents and other members of the school community) for the planning and design of the project. Address the following:
 - How many meetings occurred in the disadvantaged community and why were they convenient for low-income youth and adults, including residents lacking transportation and with various employment and family schedules. Include the meeting locations and times, the methods employed by applicant or CBO that were used to invite residents, and description and total number of residents in attendance at each meeting. In the combined set of meetings, describe how there was or was not a broad representation of residents.
 - During the meetings how were the residents enabled to design the project? Please speak directly to the processes that allowed them to work together to identify and prioritize active transportation features that best meet their needs and how they reached a general agreement on the type and design of the project.
 - Were meetings conducted in the primary language spoken by community residents? If not, what translation assistance was provided to community residents to fully understand and contribute to the development of the active transportation project?
- How will disadvantaged community residents be engaged in the execution of the proposed work? If funds for community engagement are not included in the budget, please explain why they are not needed for the proposed work.

- **Provide an ongoing set-aside of the ATP funding for disadvantaged communities to support technical assistance and planning resources.**

Disadvantaged communities often lack the resources and capacity to submit successful proposals despite overwhelmingly and unmet infrastructure needs in these areas. Access to planning and technical assistance resources will address this barrier and increase the number of successful proposals benefitting low-income underserved communities. If planning assistance is not provided, these communities will fall even further behind in their ability to compete for grants.

- **Exempt disadvantaged communities from jurisdictional planning and local match requirements.**
City-, county-, or region-wide plans and local match requirements represent barriers to competing for grants for communities with less resources and capacity to meet those criteria. In alignment with several other state programs, disadvantaged communities should be exempt from these requirements to ensure that communities with the greatest need for active transportation improvements maintain access to this program and that a minimum of the 25 percent target for funding to these communities is reached.

The incorporation of the above recommendations into the ATP guidelines will provide for a more successful implementation of the ATP program and ensure that all Californians can safely walk and bicycle to school, to work and to access critical services and amenities. By effectively investing in communities that have for too long been left behind we can achieve greater public health and environmental benefits for all California. We thank you again for your leadership and commitment to this work and we respectfully ask for your support of these important recommendations as this program moves forward.

Questions or concerns regarding this letter can be addressed to Chione Flegal, Associate Director at PolicyLink (chione@policylink.org or 510-663-4311)

Sincerely,

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