



December 6, 2018

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

**OPPOSE: 710-N Funding Reallocation | Draft Funding Recommendations**

Dear Chair Kuehl, Metro Board Members, and Staff,

As community-driven organizations concerned about the future health and well-being of Los Angeles County, we have strong reservations about Metro staff's prioritization of over half a billion in Measure R funding originally set-aside for the 710-N corridor.

**The board should direct staff to focus investments on multi-modal projects that prioritize equitable, healthy, and sustainable mobility for all.**

**The adopted 2017 Metro Board Motion** by Directors Fasana, Barger, Solis, Garcetti, and 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 by and large do NOT encourage multi-modal trips, reduce automobile dependency, or promote smart and functional land use**, despite corridor cities submitting over \$355 million in transit and over \$70 million in active transportation project requests. By prioritizing single person automobile trips above all other modes of transportation Metro's recommended project list will result in more vehicle miles traveled, more localized air pollution, more greenhouse gas emissions, and more preventable traffic collisions and deaths.

#### **Inconsistency with 2014 Board Adopted Complete Streets Policy**

In October 2014 the Metro Board of Directors adopted a [Complete Streets Policy](#) to “establish a standard of excellence for multimodal design,” recognizing Metro's unique position to “help advance advance state, regional and local efforts to create a more “complete” and integrated transportation network that serves all users (*including pedestrians, users and operators of public transit, bicyclists, persons with disabilities, seniors, children, motorists, users of green modes, and movers of commercial goods*) and supports environmental sustainability (page 3).”

Metro's Complete Streets policy further underlines that **all relevant departments at Metro, partner agencies, and funding recipients shall approach every relevant project, program, and practice as an opportunity to improve streets and the transportation network for all categories of users**, and work in “coordination with other departments, agencies, and jurisdictions to maximize opportunities for Complete Streets, connectivity, and cooperation” (Page 4).

Staff recommended projects fail to follow these guidelines and utilize best practices in multi-modal design. If realized, they will place vulnerable road users at increased risk for serious injury or death by widening streets, removing street parking, and/or increasing vehicle speeds.

Further, in making these recommendations, it appears that Metro highway staff has failed to engage or consult other “relevant departments” at Metro, despite the request for cities to submit Transit and Active Transportation projects for consideration.

### **Focus on outdated, unsustainable transportation investments**

Review of staff’s recommended project list makes clear that **project selection was driven by an effort to improve the “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](http://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf)).

In 2018 Metro should no longer be evaluating projects based on Level of Service, an outdated approach that is at odds with Metro’s own 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. This is particularly important as the transportation sector is the number one source of Greenhouse Gas (GHG) emissions locally, regionally, and statewide.

It is critical that Metro investments support efforts to reduce GHGs within the transportation sector and improve air quality, not undercut both at a moment when focused action is critical and **the California Air Resources Board has found that Los Angeles County is failing to reduce emissions from the transportation sector**. (2018 Progress Report, California’s Sustainable Communities and Climate Protection Act [https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report\\_SB150\\_112618\\_02\\_Report.pdf](https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf)). The time to bring our transportation spending in line with adopted climate goals is now.

### **Use of an opaque, inconsistent community process**

**Public engagement in project selection at the City-level was inadequate.** Some communities including South Pasadena and Pasadena provided multiple public forums for community members to weigh in on potential projects before lists were submitted to Metro, whereas others like Monterey Park and Alhambra appear not to have hosted public meetings. At a minimum corridor cities that did not have public meetings to discuss and solicit feedback on project ‘wish lists’ should be directed to do so.

**The manner in which Metro staff elevated and selected over \$400 million in projects remains 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 by staff. 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 and are inexpensive to maintain 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.

**Projects should have been given a quantitative score based on appropriate criteria, including Board-adopted policy and planning documents** (e.g., 2018 Equity Platform Framework, 2016 Active Transportation Strategic Plan, 2014 Complete Streets Policy, and 2012 Bus Rapid Transit Plan). Scoring should have accounted for proposed project impacts to public health, safety, and the environment. The project evaluation panel should have included experts in transportation equity, public health, and active transportation.

### **Inequitable funding allocation**

**Funding totals vary widely across the corridor**, with some communities recommended for significantly more funding than others, and the most disadvantaged and pollution-burdened communities within the corridor left with nominal funding awards.

<b>Metro Staff Recommended Funding Levels</b>			
<b>City</b>	<b>Funding Total by City, descending</b>	<b>Population</b>	<b>Cal EnviroScreen 3.0*</b> Average pollution burden
<b>Pasadena</b>	<b>\$105 million</b>	142,000	<b>40%</b>
<b>Monterey Park</b>	<b>\$91.3 million</b>	61,000	<b>50%</b>
<b>Alhambra</b>	<b>\$163.5 million</b>	85,000	<b>70%</b>
<b>South Pasadena</b>	<b>\$48 million</b>	26,000	<b>15%</b>
<b>San Marino</b>	<b>\$32 million</b>	13,000	<b>10%</b>
<b>Los Angeles City (El Sereno, H.P., E.R.)</b>	<b>\$22 million</b>		<b>65%</b>
<b>Los Angeles County (City Terrace)</b>	<b>\$16 million</b>		<b>95%</b>
<b>San Gabriel</b>	<b>\$13.5 million</b>	40,000	<b>65%</b>

\*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>)

**Recognizing the historic nature of the transportation investment being considered for these local communities, the undersigned organizations request that the Metro Board direct staff to follow adopted board policy and sustainability goals 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,

**Carter Rubin**

Mobility and Climate Advocate  
Natural Resources Defense Council

**Belinda Faustinos**

Executive Director  
Nature for All

**Emilia Crotty**

Executive Director  
Los Angeles Walks

**Jessica Meaney**

Executive Director  
Investing in Place

**Dr. Gene Wester**

Organizer  
Pasadena Complete Streets Coalition

**Primo Castro**

Los Angeles Government Relations Director  
American Cancer Society

**Tori Kjer**

Los Angeles Program Director  
The Trust for Public Land

**Rudy Espinoza**

Executive Director  
LURN

**Wes Reutimann**

Project Director  
Bike San Gabriel Valley

**Bryn Lindblad**

Associate Director  
Climate Resolve

**Scott Chan**

Program Director  
Asian Pacific Islander Forward Movement

**Jared Sanchez**

Senior Policy Advocate  
California Bicycle Coalition

**Cesar Hernandez**

Deputy Executive Director of Advocacy  
Los Angeles County Bike Coalition

**Jazmine De La Torre**

Program Coordinator  
Healthy Communities Initiative  
Day One

**Tony Dang**

Executive Director  
California Walks

## **710-N Corridor 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

### **Metro Board Adopted Complete Streets Policy (2014) - Policy Statement**

The principles below guide Metro's core commitments to include the needs of all users, regardless of how they travel, into the everyday decision-making process. Source:

[http://media.metro.net/projects\\_studies/sustainability/images/policy\\_completestreets\\_2014-10.pdf](http://media.metro.net/projects_studies/sustainability/images/policy_completestreets_2014-10.pdf)

1. **Complete Streets Serving All Users and Modes.** Metro expresses its commitment to work with partner agencies and local jurisdictions to plan and fund Complete Streets that provide safe, comfortable, and convenient travel along and across streets (including streets, roads, transit facilities, highways, bridges, and other portions of the transportation system) through a comprehensive, integrated transportation network that serves all categories of users, including pedestrians, users and operators of public transit, bicyclists, persons with disabilities, seniors, children, motorists, users of green modes, and movers of commercial goods. It may be ineffective to enhance all streets to accommodate all modes equally. Modal priorities may need to be established for key arterials based on context sensitive evaluations, public feedback, and a review of relevant data. Some streets may be prioritized for transit travel, others for walking, bicycling, vehicle travel, goods movement, or other types of modes. Some streets may have robust facilities that accommodate all modes; however, a number of streets might not contain all these features due to physical right of way constraints, connection with local context, and other considerations. However, all streets will allow for safe travel within an integrated transportation network.
2. **Context Sensitivity.** In planning and implementing transportation projects, Metro departments, partner agencies, and funding recipients will maintain sensitivity to local conditions in both residential and business districts as well as urban, suburban, and rural areas, and will work with residents, merchants, and other stakeholders to ensure that a strong sense of place ensues. Improvements that will be considered shall contribute to safe travel for all users and be consistent with best practices, such as the Metro First/Last Mile Strategic Plan, NACTO Urban Street Design Guide, NACTO Urban Bikeway Design Guide, Los Angeles County Model Design Manual for Living Streets, or equivalent.
3. **Complete Streets Routinely Addressed by All Departments.** All relevant departments at Metro, partner agencies, and funding recipients will work towards making Complete

Streets practices a routine part of everyday operations; approach every relevant project, program, and practice as an opportunity to improve streets and the transportation network for all categories of users; and work in coordination with other departments, agencies, and jurisdictions to maximize opportunities for Complete Streets, connectivity, and cooperation.

4. **All Projects and Phases.** Complete Streets infrastructure sufficient to enable reasonably safe travel along and across the right of way for each category of users will be incorporated into all planning, funding, design, approval, and implementation processes for any transit and highway planning and design, new construction, reconstruction, retrofits, rehabilitations, and capital grant programs, except that specific infrastructure for a given category of users may be excluded if an exception is approved via the process set forth in the “Exceptions” section of this policy. Even for projects with limited scope, opportunities to implement incremental improvements leading to long-term accommodations for all users shall be incorporated. In new Metro corridor projects, intermodal connectivity elements shall be an intrinsic part of the project’s scope in environmental documents, to the extent required, and project definition for construction.

#### Implementation

1. **Design. Metro will design and evaluate projects using the latest design standards and innovative design options**, with a goal of balancing user needs. Metro strongly encourages partner agencies and Metro fund recipients to use the best design guidelines and standards to foster safe travel for all users.
2. **Network/Connectivity.** Metro will work with partner agencies and local jurisdictions to incorporate Complete Streets infrastructure into transit and highway planning and design, new construction, reconstruction, retrofits, rehabilitations, and Metro capital grant programs to improve the safety and convenience of all users, with the particular goal of creating a connected network of facilities accommodating each category of users, and increasing connectivity across jurisdictional boundaries and for anticipated future transportation investments. Transportation facilities are long-term investments that shall anticipate likely future demand for walking, bicycling, and transit facilities and not preclude the provision of future improvements. These facilities should address the need for pedestrians and bicyclists to cross corridors as well as travel along them; this may include, but is not limited to, addressing the need along an adjacent corridor. Even where pedestrians and bicyclists may not commonly use a particular travel corridor that is being improved or constructed, key points should be identified for cross corridor accessibility. Therefore, the design of intersections, interchanges and bridges shall accommodate bicyclists and pedestrians in a manner that is safe, accessible, and convenient.
3. **Implementation Next Steps.** Metro will take the following specific next steps to implement this Complete Streets Policy:
  - A. **Plan Consultation and Consistency:** Maintenance, planning, and design of projects affecting the transportation system will be consistent with local bicycle, pedestrian, transit, multimodal, and other relevant plans.

**B. Stakeholder Consultation:** Develop and/or clearly define a process to allow for continued stakeholder involvement on projects and plans including, but not limited to, local bicycle and pedestrian advisory groups, transit riders and operators, accessibility advisory groups, automobile interests, movers of commercial goods, businesses, residents, emergency responders, and/or other stakeholders, as defined necessary to support implementation of this Complete Streets policy by Metro. Consultation with these stakeholders is part of the overall project outreach effort.

- 4. Performance Measures.** Metro will develop additional performance metrics and track progress toward achieving sustainability policies and priorities, including Complete Streets implementation, which will be included in the annual Sustainability Report developed by the Countywide Planning and Development Department. In addition, all relevant capital grant funding recipients shall perform evaluations of how well the streets and transportation network planned, designed, implemented, and funded by Metro are serving each category of users by collecting baseline data and collecting follow-up data after project implementation. This requirement has been incorporated into the 2015 Call for Projects cycle and will apply to all subsequent capital grant funding program cycles.