

Ken Alex, Chair
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VIA E-MAIL

Re: Active Transportation Recommendations for the Affordable Housing and Sustainable Communities (AHSC) Program Guidelines

Dear Chairman Alex and members of the Strategic Growth Council:

On behalf of the undersigned organizations, we applaud the hard work of the Council and your staff in embarking on the development of the Affordable Housing and Sustainable Communities (AHSC) Program. We thank you for reaffirming the Strategic Growth Council's lead role in Program design, implementation, and evaluation, and we support Vehicle Miles Traveled (VMT) reduction as the primary greenhouse gas (GHG) reduction strategy for the AHSC Program.

With achievement of the goals of the program in mind, we believe that walking and bicycling infrastructure is the key component of sustainable communities that integrates affordable housing with transit and other land uses, while also contributing to greenhouse gas reduction and to many co-benefits. We would like to see active transportation requirements for all projects, and the criteria for walking and bicycling infrastructure strengthened in the guidelines.

We offer the following broad recommendations and specific language suggestions for the Program guidelines—based on our extensive experience with similar programs and policies and the regional SB 375 Sustainable Communities Strategies—to ensure active transportation is a critical component of the Program (an appendix table is included for more specific suggestions for the guidelines language changes):

1. Fully Integrate Active Transportation into the Program to Fulfill Statutory Objectives

While the draft guidelines present active transportation infrastructure as an eligible capital use of program funds, there is no requirement that active transportation be integrated into all funded projects. As the mode by which transit, affordable housing, and other land uses are connected in lieu of SOV travel, active transportation should play a much larger role than what is currently outlined in the Program guidelines.

Roughly one-third of trips (32.3%) in California are under 1 mile in length, and yet, 59.7% of these

trips are currently made by motor vehicle.¹ These trips are too short to be replaced by transit use, but are ideal for shifting to walking and bicycling. Consequently, the Program will be most successful in reducing VMT by requiring projects to be located adjacent to transit (for longer trips, such as trips to work) **AND** to complete walking and biking networks to/from transit (for shorter trips within a walkable or bikeable distance of the project).

Therefore, we **strongly recommend, as a threshold requirement, that all funded projects be required to complete walking and biking networks** connecting a funded project site to transit stops and stations and key community destinations (schools, employment centers, social services, etc.), as well as to existing walking and bicycling infrastructure within appropriate vicinity of the project (scalable by type of community) in a significant, substantial, and meaningful manner. For those projects proposed in areas with robust existing walk and bike networks, projects could meet this threshold criteria by demonstrating the existence of these networks in their application. This approach of ensuring convenient, safe, comfortable, and accessible walking and biking connections to transit is nationally recognized as a recommended practice by the American Public Transportation Association.²

To facilitate integration of active transportation, we recommend the following language changes to the guidelines:

- Separate the “Transportation- or Transit-Related Infrastructure” eligible use category into “Active Transportation Infrastructure” and “Transit-Related Infrastructure,” as these categories of uses provide distinct travel and co-benefits and should BOTH be emphasized on all projects, not one in lieu of the other. This would also better prompt project applicants to integrate active transportation into their projects.
- **All projects should be allowed to demonstrate mode shift to walking or biking** in addition to or in lieu of transit use to meet the threshold criteria for reducing vehicle-miles traveled. The proposal for Integrated Connectivity Projects (ICPs), should specify that all ICPs must demonstrate mode shift to walking, bicycling, and/or transit (Sec. 102(b)(2)).-A similar change should be made to scoring criteria Sec. 107 (h) - “Extent to which the Project will increase public transit ridership, **walking, and bicycling** and reduce vehicle miles travelled.”

2. Move the Program Beyond TOD to Connected Communities

The draft guidelines focus primarily on connecting one destination to another—namely residences to transit and job centers—which will reduce the reach and impact of the Program’s investments.

¹ McGuckin, Nancy, “Walking and Biking in California: An Analysis of the California-National Household Travel Survey,” August 2012. Available at <http://www.travelbehavior.us/Nancy-pdfs/Walking%20and%20Biking%20in%20California%20Final.pdf>

² American Public Transportation Association. "Design of On-street Transit Stops and Access from Surrounding Areas," APTA Standards Development Program Recommended Practice, APTA SUDS-RP-UD-005-12, 2012. Available at <http://www.apta.com/resources/hottopics/sustainability/Documents/APTA%20SUDS-RP-UD-005-12%20On%20Street%20Transit%20Stops.pdf>

Because work commute and work-related trips represent a small fraction of all trips (less than 9%),³ we **recommend the Program adopt a more holistic “network” approach to incentivize VMT reduction for all trips**, where many origins are connected to many destinations through transit, walking, and biking. With 45.6% of all California trips under 2 miles,⁴ the Program will be most effective at reducing VMT by focusing on building out walking and biking networks that will facilitate mode shift to walking and biking for these short trips in addition to increasing transit ridership by ensuring that housing and transit are meaningfully connected. To that end, **additional points should be awarded to projects that provide safe and complete walking and bicycling connections to many key community destinations, services, and amenities and close a key gap in walking, bicycling, and/or trails network.**

Specifically, we suggest the following changes to the scoring criteria in Sec. 107 (g), (j), and (k):

- **Combine (g) and (j) and rename the criteria “Proximity and Accessibility to Walkable Supportive Land Uses”.** Ultimately the amenities in the table under subsection (g) are accessed via walking or bicycling from the qualifying transit station only if robust walk and bike networks are in place. Their proximity to transit alone does not maximize the potential to reduce vehicle trips to these amenities. Instead, the **new combined criteria should require that in order to receive points, each amenity must be within a half-mile of a transit station AND be located along a complete walkable network to a transit station, as defined by the “walkable corridor” features currently listed as (A) through (E) under Sec. 107 (j).** Points should also be awarded (as is currently proposed in the Draft Guidelines) for each feature of a walkable corridor included in the proposed project.
- **Section 107 (k) should also be renamed as “Extent to which the Project Completes the Bicycle Network”** and provide a stronger incentive for applicants to ensure biking access to their projects. The most important element of shifting trips to bicycling is access on low-traffic-stress streets, therefore **we recommend that the most points be awarded to projects that demonstrate that the amenities listed in Sec. 107 (g), in addition to the qualified employment areas defined in Sec. 107 (f)-within a three-mile radius of the project location are accessible via low-traffic stress streets or separated bicycle facilities designed to NACTO standards.** (This is far more indicative of bike access than the number of miles of paths relative to population density.) Points should also be awarded, in reducing order of importance, to bike secure parking at transit stations, access to the transit vehicles, and bike repair facilities at the transit

³ Caltrans. “Table 8.3.1: Trip Distribution by Activity [weighted, multiple responses],” 2010-2012 California Household Travel Survey, 2013. Available at http://www.dot.ca.gov/hq/tpp/offices/otfa/documents/CHTS_Final_Report_June_2013.pdf The following activity categories were tabulated: “Work/job duties” (6.6%), “Work-related (meeting, sales call, delivery)” (2.1%), and “All other work-related activities at my work” (0.2%).

⁴ “Percent of Person Trips in California by Trip Length: people 16 and older.” California Add-on to the 2009 National Household Travel Survey (Caltrans). Analysis by Nancy McGuckin.

station.

3. **Maximize Health & Safety Co-Benefits Delivered by the Program**

The current scoring distribution places too strong an emphasis on Feasibility and Project Readiness—unduly minimizing the Community Orientation criteria and particularly for the delivery of co-benefits.⁵ While project readiness is an important consideration, we believe this Program should not strive to simply deliver projects but to also maximize co-benefits in order to achieve community transformation. Moreover, rewarding applicants who can leverage additional funds too heavily could unintentionally impede applications from disadvantaged communities. Accordingly, **we recommend that the Community Orientation criteria be weighted much more heavily than the Feasibility and Readiness criteria.**

Additionally, long-standing health and safety disparities in disadvantaged communities require concerted investments to reduce these gaps. For example, pedestrian fatality rates per 100,000 for people of color in California are 20-77% higher for American Indians and Alaska Natives (3.68), African Americans (3.25), and Hispanic (2.48) individuals compared to their white counterparts (2.08).⁶ Accordingly, **we recommend that for each project applicants be required to address ALL co-benefits related to public health and safety, and receive points under Sec. 107 (p) for all co-benefits that are positively impacted by the project.** We also strongly support awarding additional points to projects serving disadvantaged communities for providing additional co-benefits to those community residents.

4. **Meaningful, Robust Public Participation, Community Engagement, & Assistance to Disadvantaged Communities**

Since travel behavior change cannot be mandated with a top-down approach, it is **critical for community residents to be meaningfully engaged from the outset** in order to ensure that funded projects will help shift trips to walking, biking, and transit. This will also ensure that projects meet the needs of community residents, receive community-wide support, and expand public access and use. We strongly support the draft guidelines' approach to requiring that applicants "must demonstrate how outreach was designed to **remove barriers** to community participation and provided opportunities for engagement of community members, in particular lower-income households and DAC residents, which the project is proposed to benefit" (Sec. 107(q)(1), pg. 52) (emphasis added). To further strengthen this aspect of the application, we **strongly recommend guidelines explicitly require applicants to address language access, cultural competency, and community convenience** (e.g., through the provision of child care, meetings located within

⁵ SB 862, Section 75210(c)

⁶ Smart Growth America and the National Complete Streets Coalition. *Dangerous By Design 2014: California*. 2014. Available at www.smartgrowthamerica.org/documents/dangerous-by-design-2014/dangerous-by-design-2014-california.pdf

community or walking distance to transit, scheduling meetings outside of traditional work hours, etc.) in the project application process.

We commend the draft guidelines for committing to providing targeted technical assistance to potential applicants, with a priority to disadvantaged community applicants. However, we **strongly urge the Council to conduct targeted outreach AND provide technical assistance to disadvantaged communities PRIOR to the submission of concept proposals**. This approach would help to encourage disadvantaged communities to apply and could help maximize the number of concept proposals from these communities. Moreover, we recommend that the types of technical assistance to be provided be clearly defined and should include grant writing assistance

5. Reward Local Jurisdictions that Adopt Strong Policies to Implement Innovative Active Transportation & Complete Streets Projects

We support the scoring criteria that awards points for Leveraging Prior Planning Efforts, and recommend that points also be awarded for:

Adoption/Implementation of Innovative Active Transportation Designs and NACTO Design Guidelines: Innovative active transportation facilities and designs—such as protected cycle tracks, temporary curb extensions, pop-up plazas, parklets, etc. outlined in the National Association of City Transportation Officials (NACTO) Urban Streets Design Guide and Urban Bikeway Design Guide—have evolved rapidly over the past few years. The Program should encourage these forward looking approaches to active transportation and reward jurisdictions who wish to implement innovative designs.

Adopted Complete Streets Resolution or General Plan Update: The Program can look to the Metropolitan Transportation Commission’s OneBayArea Grant (OBAG) program for lessons learned on leveraging grant funds to incentivize compliance with AB 1358, the California Complete Streets Act of 2008. The OBAG program, for example, required certain minimum elements to be included in a Complete Streets resolution.

Updated Transportation Impact Policies: In anticipation of SB 743’s replacement of Level of Service (LOS) Analysis with VMT metrics, the Program can reward jurisdictions that update their local general plans, zoning codes, or other planning requirements to implement SB 743. The Program could even reward jurisdictions that apply VMT analysis beyond Transit Priority Areas to a greater degree in the scoring criteria.

6. Disallow Program Funds that Support Single Occupancy Vehicle (SOV) Travel

The draft guidelines clearly state that its primary strategy to achieve VMT reduction is “through a mode shift from single occupancy vehicles (SOV)” (Sec. 102, pg. 8); however, the draft guidelines

currently include project eligibilities that run counter to this goal.

Funded projects should not contribute to induced demand for driving over walking, biking, and transit. Accordingly, we believe that funding for motor vehicle **parking spaces or structures should not be an eligible use** of program funds. While we recognize that local planning codes may require parking construction as part of the development, the state should not be subsidizing this construction as it runs counter to the program's goals. Parking should be funded by the developer with other non-state funds. Moreover, projects that include **parking other than for car sharing should receive negative points** in scoring to actively discourage personal vehicle use.

Lastly, we are **concerned with the inclusion of "streets" in the eligible costs for housing-related infrastructure (Sec. 103(a)(F)(i))**. Street construction projects should be limited to providing or improving multimodal travel options, NOT automobile throughput. We recommend that this caveat be explicitly detailed so as to discourage greenfield development projects that would require construction of new streets.

Thank you for your leadership in implementing the Affordable Housing and Sustainable Communities Program. We look forward to working with you as you develop the guidelines and implement, monitor, and evaluate the program. We are available at your convenience to discuss any of the above recommendations. Please contact us if we can be of assistance.

Sincerely,

Wendy Alfsen, Executive Director
California Walks

Jeanie Ward-Waller, Senior California Policy Manager
Safe Routes to School National Partnership

Dave Snyder, Executive Director
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Encl.

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Appendix A
Additional Comments

Section	Sub-division	Para-graph	Table/ Figure	Page(s)	Comment
101	--	--	Table 1	7	Replace “infrastructure-related Capital Use(s)” in Sec. 102 cell of TOD Project column with “transit-related or active transportation infrastructure Capital Use(s)” to align with the language used in the draft Guidelines, Section 102(a)(5) (pg. 10) and to reaffirm transportation/land-use integration
102	(b)	(1)	--	10	Re-number subdivision b to fix typo; Revise mode shift criteria to include active transportation in addition to or in lieu of mode shift to transit: “Demonstrate mode shift from SOV use to transit use or active transportation or walking/biking to Key Destinations”
103	(a)(1)(D)	ii	--	12	Add specific examples of sidewalk barriers, including “utility boxes, poles, etc.”
103	(a)(1)(F)	i	--	13	Remove “parking spaces or structures” from list of eligible costs
103	(a)(2)	--	--	13	Recommend separating category and renaming as “Active Transportation-Related Infrastructure Capital Uses” and “Transit-Related Infrastructure Capital Uses” ; Reorder eligibilities to appropriate new categories; Re-number accordingly
103	(a)(2)	A	--	13	Include “and schools” after “employment centers” to put equal emphasis on access to schools as on access to jobs.
103	(a)(2)	A	--	13	Align project boundaries to align with Federal Transit Administration guidance. ⁷

⁷ Federal Transit Administration. Final Policy Statement on the Eligibility of Pedestrian and Bicycle Improvements Under Federal Transit Law. 76 FR 52046. Available at <http://www.gpo.gov/fdsys/pkg/FR-2011-08-19/pdf/2011-21273.pdf>

					Define eligible enhancements for bicycle access as within 3 miles of transit station; Retain one-half mile distance for public transit and pedestrian access improvements
103	(a)(2)	D	--	13	Please add that in this cost-benefit analysis, completing gaps in an existing off-street pathway or trail network will be considered a substantial benefit and a high priority.
103	(c)	2	--	14	Remove "except as indicated in Table 5 below" Revise Table 5 accordingly
103	Construction	--	Table 5	16	Remove "Parking spaces/structures" from table
103	Complete Streets and Non-Motorized Transportation	--	Table 5	16-17	Add " comfort " to first item ("...improve mobility, access, comfort and safety"); Add " pedestrian countdown signals " to street crossing enhancements; Clarify "Signage and way-finding markers" is restricted to bicycle and/or pedestrian signage/wayfinding; Add " rectangular rapid flashing beacon, pedestrian hybrid beacon " to list of traffic control devices; Add " parklets " to list of street furniture; Add " Bike Share Station " to this section
103	Complete Streets and Non-Motorized Transportation	--	Table 5	17	Under "street furniture," clarify that benches and other amenities along paths and trails are also eligible.
103	Complete Streets and Non-Motorized Transportation	--	Table 5	17	In addition to bicycle lanes and paths, add " multi-use paths, cycle tracks. "

103	Complete Streets and Non-Motorized Transportation	--	Table 5	17	Add “purchase, installation and maintenance of automated counters” as eligible uses.
103	Programs	--	Table 5	19	Revise/clarify “bike sharing programs” to “bike sharing program operations”; Add evaluation activities, manual and automated counting of people who walk and bike, to this section;
105	a	3	--	22	Clarify that non-profits are eligible entities for “Program Operator” purposes; Revise Glossary to match
107	--	--	Chart 2	31	Add active transportation to third bullet under “Connectivity and Improved Access”: “Extent to which the Project increases public transit ridership, increase rates of walking or biking , and/or reduces vehicle miles travelled” Add new bullet point on gap closures under “Connectivity and Improved Access”: “Closes gaps in a local/regional pedestrian/ bicycle network or trail/pathway system”
107	e	4	--	37	Add separate “Bicycle Master Plan” and “Pedestrian Master Plan” to supplement existing “Bicycle/Pedestrian Master Plan”; Add “Trails Master Plan” and “Safe Routes to School Master Plan” to list of planning efforts
107	f	--	--	38	Include schools as an equivalent priority destination to “employment areas”, since schools are equivalent peak-period trip generators. Change criteria to “Accessibility of Qualified Employment Areas and Schools ”, and include similar point values for number of attending students.
107	g	1	Transit -	39	Amenities and services should be awarded points based on trip generation and on co-

			Supportive Amenities and Services		benefits. For example, “park or playground” should receive equal or greater points than “health club, sport court, or active outdoor recreation facility” in that a park or playground provides greening co-benefits in addition to being an outdoor recreational facility. Similarly, a farmers market provides fresh, healthy food that contributes public health co-benefits to a project, and should receive more points than a convenience store.
107	h	--	--	40	Add active transportation to scoring criteria: “Extent to which the Project will increase public transit ridership, increase rates of walking or biking , and/or reduces vehicle miles travelled”
107	h	3	--	41	Shuttle/vanpools may themselves be operating as de facto transit for some populations, so would suggest removing “to a Transit Station” to better reflect this reality; Replace “Accidents” with “ Collisions ” in the table
107	i	5	--	43	Remove point value for electric vehicle charging stations in draft Guidelines as point values have not yet been determined for any other scoring criteria
107	j	E	--	44	Add “ placemaking amenities (such as plazas, parklets, water fountains, etc. en route to the station) ” to the list
107	p	(1)	--	51	Revise public health co-benefit requirement to: “At least two must be a public health and safety co-benefit...”
107	q	1	--	52	Add the following to list of items applicant should detail: “ the primary language spoken by community residents and whether translation services were offered or provided ”

					<p>“efforts to make the length and times of meetings convenient for community residents (for example, through the provision of childcare, holding the meeting in neighborhood within walking distance to residents, etc.)”</p> <p>“how the meeting was facilitated in a culturally-competent and respectful manner”</p>
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