



EnviroMetro
— LOS ANGELES' COALITION FOR GREEN —
EQUITABLE & HEALTHY TRANSPORTATION

October 1, 2015

Re. Suggested Project Performance Measures and Metro Policy Reforms

Dear Metro Board Members:

On behalf of EnviroMetro, we are writing to provide input into Metro's policies that will guide spending from the next transportation sales tax measure. EnviroMetro is coalition of over 70 public interest organizations that envision a more sustainable, healthy, and livable Los Angeles for all. We seek to reduce emissions, enhance equity and public health, integrate natural assets, and incorporate green infrastructure along our transit corridors. We are advocating for infrastructure that integrates these planning objectives in a forward-thinking way, investments that brings together transportation, water protection, open space and biodiversity similar to other world-class metropolitan areas such as Chicago, New York, and Portland. We can no longer afford to design and implement infrastructure systems in silos. We need to be smarter about how we make public infrastructure investments.

To help guide Metro's progress in this direction, we propose that Metro implement a number of specific performance metrics/targets and policy reform suggestions, as listed below.

Reduce Emissions

- Reduce per capita VMT by 15% below 2010 levels by 2030.
 - This is likely what is needed to achieve 50% petroleum reductions statewide, and is less ambitious than Caltrans' Strategic Management Plan target of 15% reductions by 2020.
- Increase per capita transit ridership & bike/ped mode share to a combined 50% mode share by 2035.
 - This is consistent with the City of LA pLAN, which calls for 50% combined mode share by 2035 (up from 26% in 2012), and only modestly more ambitious than Caltrans' targets for 2020, namely to triple bike mode share (which was 1.5% in 2012), double walking (which was 16.6% in 2012), and double transit (which was 4.4% in 2012) for a combined mode share of 46.5%.
- Reduce total GHG emissions from transportation to 18% below 2010 levels by 2030.
 - This is an extension of the SB 32, CARB, and Caltrans targets of 15% reductions below 2010 levels (return to 1990 levels) by 2020.
- Reduce per capita GHG emissions from transportation to 16% below 2005 levels by 2035.
 - This is consistent with SGAG's RTP/SCS, meets CARB's regional target, and in 2012 the Metro Board adopted a resolution that it would try to meet this goal.
- Reduce GHG emissions per passenger mile on all transit modes, including vanpool.
 - This could either be structured as a 15% reduction below 2006 efficiency levels by 2020, as AC Transit (Alameda-Contra Costa) has aspired to, or a 5% annual improvement, as SEPTA has set its goal to be. Currently vanpool vehicles are not subject to any clean vehicle requirements.

- All projects are GHG net neutral or negative over the lifetime of the project.
 - We are not aware of any precedence for this, but encourage Metro to be a leader in this area. The UC Davis Study entitled '[Prioritization of Transportation Projects for Economic Stimulus with Respect to Greenhouse Gases](#)' begins to lay a framework for approving projects based on lifetime GHG emissions.

Enhance Equity & Public Health

- Keep transit fares fixed. If they are to be increased, the increase should be no more than half the rate of inflation.
- Any funds allocated towards the movement of freight should be for zero emissions technology.
- Prioritize investments in the top 10% of disadvantaged communities in these areas:
 - Maintain or improve high frequency bus or rail service;
 - Address the urban head island effect through tree canopy, bus shelter cover, cooling pavement solutions, and stormwater management techniques to prevent flooding.
- Create and host a 'Transportation Equity Task Force' that includes:
 - Relevant Metro department personnel;
 - Mission-related, community-based organizations;
 - Leading research and academic institutions;
 - Technical experts.
- Work with the Equity Task Force to develop a Transportation Equity Policy and framework for future Metro funding programs (i.e. Call for Projects, Open Streets Grant Program, ExpressLanes Net Toll Revenues Re-Investment Grant Program, future ballot measures, etc.) that:
 - Defines transportation equity in the context of, but not limited to mobility needs for vulnerable road users, environmental sustainability, public health and safety, economic prosperity, low-income levels, transit-dependence, underfunding in geographic areas, cost effectiveness, affordable housing, and access to jobs, education and transit.
 - Sets funding goals based on the approved definition of transportation equity.
 - Establishes evaluation criteria for future funding programs based on a Board-approved Transportation Equity Policy.
- Authorize the Equity Task Force to:
 - Participate in the review process of recommended projects for each future funding program.
 - Support the creation of an equity toolbox that includes, but is not limited to an equity calculator, mapping tools, infographics, messaging campaigns, and marketing materials.
 - Coordinate and host a Transportation Equity Summit within two years of creating the Equity Task Force.
 - Partake and share ideas with the Declining Ridership Task Force.
- Report back by summer 2016 with a status update and early action plan for implantation of the Transportation Equity Policy.

Integrate Natural Assets

- Design and implement a comprehensive 500-mile network of waterway active transportation trails within 20 years, aimed at reducing congestion and providing safe route alternatives for commuters.
- Complete a study and implement a robust Transit-to-Trails initiative to connect residents and visitors to our publically managed lands.

- Implement elements from the new Metro ‘Green Places’ toolkit at each station and complete 1st/last mile access improvements within a 1-mile radius of each station.

Green Infrastructure:

- Assess the priority of projects based on the following criteria:
 - Amount of dry weather and stormwater runoff captured/mile along Metro project
 - Reduced pollutants loads and exceedances, especially for Total Suspended Solids, and Oil & Grease
 - Number of miles Metro project runs along park poor neighborhoods (with the potential for Green Infrastructure)
 - Number of shade trees supported by captured runoff within a quarter mile of Metro project
 - Number of miles Metro project runs within a quarter mile of Greenways
- Maximize cooperation with other municipal and industrial stormwater permittees in the region.
- Adopt the standard 2% or more of tax revenue dedicated to Green Infrastructure, such as in Orange County.

To guide the implementation of the above-named Green Infrastructure performance measures, we additionally suggest that Metro adopt the following policy reforms:

Water Use and Conservation

This policy is entirely focused on the use of first-run potable water, whereas federal, state, and regional policies recognize all water, including dry weather and stormwater runoff, as a potential water supply serving multiple purposes. The U.S. Department of Transportation recently announced that their funding program prioritizes projects that address stormwater through natural means, avoiding impacts to water quality, and providing benefits like groundwater recharge, brownfield redevelopment, and stormwater mitigation including green infrastructure. The California Water Action Plan incentivizes the transformation of localized single-purpose projects into regionally-significant projects that provide multiples benefits, such as water supply and quality improvements, as well as greenways that improve air quality and reduce the heat island effect. The Los Angeles Regional Water Quality Control Board is requiring all 84 municipalities to coordinate the capture of dry weather and stormwater runoff regionally through Watershed Management Plans that include “green” streets throughout at least 50 percent of impervious areas.

In concert with federal, state, and regional counterparts, we encourage Metro to amend its policy to provide for “Water Use, *Reuse*, and Conservation.” The policy should also be amended to include the following Best Management Practices (BMPs):

- Retain all dry weather runoff and all stormwater from the 85th percentile 24 hour storm on MTA properties using control methods such as (but not limited to) galleries, cisterns, barrels, or bioswales as appropriate
- Reuse captured water at stations, terminals, and yards for surrounding irrigation needs and cleaning/washing equipment in non re-circulating systems
- Capture excess runoff from irrigation and cleaning for storage and pollution control
- Monitor and assess captured runoff for quantity and quality

Evaluation of the above BMPs should be assessed based on:

- Connection to non-Metro Greenways (refer to LA Bureau of Sanitation's GRASS tool)
- Capacity to capture at least 6 AF/mile of dry weather and stormwater runoff
- Reduction of pollutant loads and exceedances, with particular attention to Total Suspended Solids, metals, as well as Oil & Grease
- Number of miles within park poor neighborhoods
- Number of shade trees supported by captured run off along and w/in a quarter mile of transit corridors
- Green infrastructure elements that create a sense of place within urban communities such as stormwater collection parks and bioswales with native trees

Additional BMPs and assessments can be found in the [City of Los Angeles Low Impact Development Manual](#).

Green Construction Policy

While we applaud Metro for the air quality benefits from its construction projects and equipment, this policy is missing a water element. Metro has dozens of construction sites, both terminated and active, that contribute to dry weather and stormwater runoff regionwide. Like air quality, we encourage Metro to amend its Green Construction Policy to recognize opportunities for runoff mitigation thereby providing water quality and supply benefits.

The policy should be amended to include the following Best Management Practices:

- Improve the Metro Group Stormwater Pollution Prevention Plan to include stormwater retention galleries along railways countywide
- Prevent runoff from construction sites
- Use BMPs (such as elevated equipment, oil pans under equipment, and holding tanks) to prevent release of pollutants such as oil, grease, and other solvents on site
- Capture all water used for construction purposes for proper disposal or reuse
- Train all employees on sites about proper handling of equipment to prevent pollution or runoff of dry weather and stormwater

Furthermore, in its Green Construction policy we encourage Metro to adopt a Regional Advanced Mitigation Program (RAMP) to meet its regulatory mitigation requirements. Project construction budgets already include funds for environmental review and for mitigating biological impacts. To date, Metro has used an inefficient project-by-project approach. With a front-loaded RAMP, however, expedited permitting saves time and money, and acquisition and restoration are more biologically meaningful. Through comprehensive mitigation and reduced regulatory costs, RAMP provides multiple additional benefits for people and nature. We recommend the following BMPs:

- Institute a robust and comprehensive Regional Advance Mitigation Program, such as those used successfully in Riverside, San Diego, and Orange Counties and in the 9-county Bay Area.
- Coordinate with relevant regional planning entities like the Southern California Association of Governments in the creation of a regional GIS green infrastructure database and plan, known as a greenprint, that includes transportation projects, county-wide habitat assessment, open space and parks, water resources and stormwater management, air quality, climate mitigation, urban forests, and heat island effect
- Review, score, and prioritize projects for funding and implementation based on alignment with the greenprint to ensure a balance of grey and green infrastructure

Environmental Liability Assessment & Reporting Program

Metro's Environmental Liability Assessment and Reporting Program provides direction for department heads to coordinate with the Environmental Compliance and Service Manager on compliance with liabilities, but fails to lay-out a clear protocol. Insofar as water compliance is concerned, department heads should:

- Develop a Stormwater Pollution Prevention Plan for all sites, not just terminals and yards, to be approved by the Los Angeles Regional Water Quality Control Board
- Take samples of water quality at multiple, downslope, locations at each site
- Process samples at a certified laboratory
- Report findings quarterly

Metro stands to save up to \$37,500/day per pollutant exceedance by implementing the Green Infrastructure recommendations provided above.

We hope that you find the above recommendations useful and motivating, and we very much welcome the opportunity to partner with Metro to incorporate these performance metrics and policy reforms into its standard practices. If you have any questions, you are encouraged to contact Bryn Lindblad by email: blindblad@climateresolve.org / phone: 213-346-3200 x303.

In collaboration,

[EnviroMetro](#) – Los Angeles' Coalition for Green, Equitable & Healthy Transportation