



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

May 25, 2017

Metro Staff and Board of Directors
1 Gateway Plaza
Los Angeles, CA 90012
submitted via: theplan@metro.net

RE: EnviroMetro Comments on Measure M Draft Guidelines

Dear Metro staff and directors --

First, thank you for this opportunity to provide feedback on the Measure M draft guidelines -- a momentous opportunity, indeed.

Our transportation infrastructure and the services that Metro delivers are integral to the social, economic, and environmental well-being of Los Angeles County. In the interest of shaping Measure M's impact such that it does minimal harm to communities and creates the real positive change voters expect, the EnviroMetro coalition offers the following suggestions for changes to the draft guidelines:

- 1. Implement performance criteria for Highway subfunds; make harmful expenditures ineligible.** All projects funded by Measure M should be in alignment with State climate goals, vehicle miles traveled (VMT) reduction targets, commitment to reduce burdens in disadvantaged communities (DACs) and improve safety (especially for the most vulnerable users on the road: pedestrians and cyclists). "Project readiness" should be defined as meeting certain performance criteria within these objective categories. If funding pre-construction activities, EnviroMetro strongly recommends that Metro place a cap on the percent of project costs for those activities, as a way to discourage harmful highway projects from using up valuable capital resources that could otherwise be spent enhancing communities. Noise mitigation components of projects should be allowed as eligible expenditures, as well as the possibility of repurposing roads for other community uses. Metro should not explicitly exclude "beautification" from eligibility, as green infrastructure improvements provide beautification co-benefits.

- 2. Expand green infrastructure definition to cooling benefits, innovative materials, and maintenance; require multi-benefits.** In addition to stormwater management benefits, green infrastructure can also deliver cooling and shade. As extreme heat days are on the rise, it is crucial that we combat the urban heat island effect on our streets in order to achieve significant improvements in public health and make alternative modes of transportation more appealing to Angelenos. This is especially imperative for low-income communities who are typically transit-dependent and have disproportionately less greening elements in their communities. These green infrastructure elements should be multi-benefit, delivering not only environmental results, but also enhancing the community experience of that space. Trees and biomass as well as innovative materials, such as surface coatings that reflect more solar radiation than their heat-absorbing/radiating alternatives, should be eligible green infrastructure expenditures in all capital project subfunds. The maintenance of this green infrastructure to sustain full lifecycle benefits should be an eligible expenditure in all operations and maintenance subfunds.
- 3. Include recreational transit eligibility in all operations subfunds.** This includes transit service to parks and open space, which are otherwise inaccessible to transit-dependent households, resulting in significant disparities in public health outcomes. Currently, recreational transit is only named as an eligible expense in the Local Return section; however, other subfunds that support transit service expansion should also explicitly allow recreational transit service.
- 4. Provide further guidance on best management practices for delivering multi-benefit Local Return investments; establish performance metric tracking and incentivize improvements.** Make sure that all local jurisdictions have sufficient access to information regarding recommended practices for making streets green and complete. Provide tools that help jurisdictions identify opportunities for multi-benefit investments, and establish a performance metric tracking system to help them monitor their progress across several indicator areas, such as urban heat and quality of pedestrian and bicycle infrastructure. Performance metric tracking will not only give Metro-area projects an advantage when applying for State or Federal funds, it could also be used to drive progress by tying improvement to incentives within Metro's own competitive funding programs.
- 5. Orient competitive funding programs to meet critical needs and leverage multi-benefit investments.** Already at this stage, establish guiding principles for the competitive funding programs that are to undergo forthcoming detailed guideline development. Namely, require that performance criteria be developed so that funded projects meet clearly identified objectives such as: network connectivity, multi-modal mobility, sustainability, safety, equity, and community engagement. It is also crucial that Metro provide technical assistance to DACs so that communities most in need of transportation investments have a good chance at applying for those competitive funds.

- 6. Create a short-term pathway for new priorities to emerge; establish robust public participation standards for program development.** The five- and ten-year timeline horizons for Measure M program amendments is too long to respond to community needs. Especially given the gaps that exist in the expenditure plan for creating a comprehensive regional active transportation network, a mechanism needs to exist whereby new programs -- that meet performance criteria named above, which are to be included in the Measure M master guidelines -- may become eligible for Measure M funds. For example, the Greenway Network is left out of most subregions' mobility matrices top project lists; however, this should not persist as an undue impediment for those remaining subregions to pursue such projects. As such, the definition of the Greenway Network should be expanded beyond routes that are adjacent to urban waterways to also include routes that utilize other existing public right-of-ways, such as utility corridors and abandoned rail lines.

Additionally, when the opportunity presents itself:

- 7. Consider initiating a process to bring previous revenue sources' requirements into alignment with Measure M eligibility and performance standards.** Prop A (1980), Prop C (1990), and Measure R (2008) continue to be significant sources of revenue for transportation infrastructure spending, and discrepancy between the eligible cost provisions of the now-four local sources of funding present challenges to local and subregional implementers. Metro should initiate a process to update those previous revenue sources' guidelines to better support multi-modal, green infrastructure spending, in alignment with the Measure M guidelines and evolving voter attitudes.

As you continue this process of refining the Measure M guidelines, we encourage you to be ambitious in estimating the potential that you have to transform Los Angeles' transportation landscape into a greener, healthier, more equitable one. We also urge you to exercise caution and prevent Measure M funds from being expended in ways that would exacerbate environmental harms and hurt vulnerable communities. We offer our partnership in the effort to further develop any and all of the ideas presented above. We invite you to contact Bryn Lindblad at blindlad@climateresolve.org / (213) 634-370 x102 if you have any questions regarding the contents of this letter.

Sincerely,

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