



March 16, 2015

Mr. Will Kempton
Executive Director
California Transportation Commission
1120 N Street, MS-52
Sacramento, CA 95814

SUBJECT: Active Transportation Program (ATP) Statewide Guidelines

Dear Mr. Kempton,

The Southern California Association of Governments (SCAG) in partnership with Imperial County Transportation Commission (ICTC); Los Angeles County Metro (Metro); Orange County Transportation Authority (OCTA); Riverside County Transportation Commission (RCTC); San Bernardino Associated Governments (SANBAG); and Ventura County Transportation Commission (VCTC) would like to thank the California Transportation Commission for providing the opportunity to comment on the draft 2015 Active Transportation Program (ATP) Guidelines. The ATP program is a critical funding source for the implementation of SCAG's Regional Transportation Plan/ Sustainable Communities Strategy, addressing active transportation needs and supporting an effective transit system in a region with a population over 18 million people representing 191 cities in six counties.

Please accept our comments and recommendations for the 2015 draft ATP Guidelines. The comments listed below outline recommendations to expedite the delivery of projects, guarantee successful project delivery, ensure that disadvantaged communities remain competitive and provide program flexibility for various projects.

1. **Planning:** SCAG and the County Transportation Commissions support the continued funding of planning projects including the development of community-wide and district plans (like first-last mile or bike-share plans). Out of the 191 SCAG member cities, 93 have bicycle plans and only 27 have pedestrian plans. These local plans are critical to the development and implementation of projects that meet state mobility and sustainability goals.



2. **Allocation:** SCAG and the County Transportation Commissions recommend that the Commission consider alternative methods for the allocation process. The current process duplicates the obligation process for federally funded projects and increases the time required to deliver projects. In addition, the process inflicts a hardship on lower budgeted projects and smaller communities due to the significant administrative/ staff resource requirements.
3. **Technical Assistance Resource Center:** SCAG and the County Transportation Commissions support the continued funding of the Technical Assistance Resource Center (TARC) and looks forward to ensuring technical assistance is available to all communities to help them plan and deliver projects.
4. **Incidentals:** SCAG and the County Transportation Commissions request revising the incidentals to exempt landscaping that serves a function integral to the usability of the project from the 10% limitation. Examples are:
 - Trees directly shading users;
 - Trees or planters that form a protective barrier between a project and a roadway or other safety hazard;
 - Plantings that delineate bike or pedestrian pathways.Decorative should continue to be subject to the 5% of the project cost-limitation.
5. **Construction/Final Design:** SCAG and the County Transportation Commissions do not support the requirement that construction-only projects submit a final design with their application. Many Cities apply for construction funding before final design is completed, then use staff expertise and local resources for final design once construction funding is committed. This strategy allows cities to target financial and staff resources to committed projects and ensures the timely and efficient use of state and federal funds by aggregating them on a single implementation phase.
6. **Match:** SCAG and the County Transportation Commissions support the strategy to incentivize a match based on the percentage of match provided by the project sponsor. SCAG recommends the following tiered strategy:
 - a. **5 points- 20%**
 - b. **4 points-15%**
 - c. **3 points-10%**
 - d. **2 points-5%**
 - e. **1 point-1%**



Thank you again for this opportunity to comment on the 2015 draft ATP Guidelines. Should you have any questions, please contact Stephen Patchan at Patchan@scag.ca.gov, or (213) 236-1923.

Sincerely,

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