

November 18, 2015

The Honorable Mark Ridley-Thomas, Chair  
Metro  
One Gateway Plaza  
Los Angeles, CA 90012

Re: Response to Metro Draft Ballot Measure Framework

Dear Chair Ridley-Thomas and Board Members,

Metro's update to its Long Range Transportation Plan and concurrent consideration of a new ballot measure presents an opportunity to articulate a community-focused vision for mobility in Los Angeles County. Too often, transportation planning is focused on chasing ever-diminishing returns on commute speed to the exclusion of other goals, such as safety, accessibility, equity, and sustainability. With recent studies highlighting the challenges of aiming to reduce congestion as a goal of major projects, for both highway projects and transit projects, these multiple benefits of transportation investment should play an even greater role in determining how limited funds are expended. Investing in Place is pleased to see Metro develop a framework that considers these goals in the evaluation of major projects and believes, with further refinement, these goals can guide strategic investments based on desired outcomes as part of a balanced expenditure plan.

It's important to note that *the performance metrics proposed in the Metro staff report are for major project selection*, which are related to, but not the same as, performance objectives for the ballot measure overall. Given that major projects are only one part of the overall expenditure plan, *Investing in Place offers the following objectives for the entire ballot measure*. We hope that these objectives inform the entire range of decisions that remain about the expenditure plan, including allocations to major capital projects, local return, operations and maintenance, and active transportation, as well as policies attached to these funds to ensure social equity, environmental sustainability, and transparency and accountability. Please find attached to this letter more detailed comments in response to the proposed project selection metrics.

In Los Angeles County, half of all trips are less than three miles. These everyday trips—to school, shopping, services, recreational opportunities, and work—are an overlooked facet of transportation planning, yet absolutely critical for residents' daily needs. With such a strong focus on major capital projects, Metro's framework lacks a comprehensive strategy for addressing these short trips. The 2016 ballot measure is an unprecedented opportunity to provide a truly integrated, balanced transportation system—one that is balanced not only by modal investments, but also by making coordinated investments across the various trip types that people make in their daily lives. This framework should articulate a vision for how everyday trips will become more accessible to people traveling by all modes of transportation. This framework should also articulate how all parts of the expenditure plan—major capital projects, operations and maintenance, active transportation, and local return—are essential to meeting these transportation needs. This people-oriented framework should guide the metrics Metro uses to evaluate its investments, and ensure that the result is a system that is accessible, safe, and equitable.

While it is important to evaluate individual projects against performance measures, it is even more vital to ensure that the suite of investments adds up to meet the region's transportation challenges. With that in mind, Investing in Place urges Metro to achieve the following overarching goals through the ballot measure:

## **All Residents Have Access to Reliable and Affordable Transportation Options**

Residents should have multiple options for traveling around their communities and the region. Metro is in the midst of one of the nation's largest public works programs to build an impressive network of rail lines across much of the county. For this rail network to be successful, residents must have access to high-quality walking and biking infrastructure and high-frequency bus transit. The ballot measure should meet the following objectives:

- 100% of Metro stations, bus stops, and schools are served by ADA-accessible sidewalks connecting to nearby origins and destinations.
- 90% of Los Angeles County residents live within ½-mile of high-quality bikeways, including 100% of identified Disadvantaged Communities.
- 80% of Los Angeles County residents are served by high-frequency transit (minimum 15-minute off-peak), including 100% of identified Disadvantaged Communities.
- 100% of local jurisdictions have Active Transportation Plans, as defined by the California Active Transportation Program.
- 100% of public schools are served by Safe Routes to School education programs.

While these are countywide objectives with regional benefits, some of these objectives could be accomplished through policies governing local return. Regional priorities identified in Metro's Active Transportation Strategic Plan, including first/last-mile improvements, regional active transportation facilities, and Metro's Safe Routes to School Strategic Plan should be included in the countywide capital improvement program. Education and encouragement programs should be included as a countywide program need.

## **A Transportation System that is Safe for Everyone**

The City of Los Angeles is currently embarking on a ten-year campaign to end traffic deaths by 2025. As part of Vision Zero, LADOT is using collision data to prioritize investments in safer streets throughout the city. This data-driven transportation planning is a model for Metro to make strategic investments in traffic safety countywide. Metro should adopt this international best practice.

## **Investments that Prioritize Historically Disadvantaged Communities**

Los Angeles County has tremendous disparities in wealth, health outcomes, and access to education, jobs, and services. Transportation's role in perpetuating these disparities is increasingly understood, as are the opportunities to mitigate historical disinvestment with intentional policy to prioritize the needs of low-income communities of color. Race, income inequality, and environmental justice are complicated issues, but public investment plays an essential role in addressing them. It is important to clarify that the physical location of a project in a community is related to, but not the same as, benefiting that community. Some projects may have adverse impacts that compound existing environmental justice concerns, while other projects may benefit low-income communities of color without being located within a particular geographic boundary. Investing in Place has formed a technical workgroup with Metro staff and expert partners to better define these issues as they relate to Metro's investment decisions and propose solutions to create a more equitable county. Working together, we hope that the ballot measure can target investments in areas based on a shared definition of high need.

Investing in Place appreciates Metro's openness in crafting a ballot measure that responds to the region's diverse needs. At this stage in the process, it is important that Metro stay focused on outcomes and be willing to explore multiple investment scenarios to evaluate their consistency with these principles. The Board faces a series of decisions that all have implications for whether the measure will create an accessible, safe, and equitable

transportation system for Los Angeles County. We look forward to working with you in the coming months to achieve these shared objectives.

Sincerely,

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**Enclosure: Comments on Proposed Project Selection Metrics**  
**Comments on Proposed Performance Metrics Framework for Major Projects**

Investing in Place appreciates the opportunity to weigh in on the proposed performance metrics for major capital projects. Overall, these metrics provide a strong framework for evaluating which projects to prioritize in the ballot measure and demonstrate the breadth of potential benefits from additional transportation investments. To be useful for comparing major projects, it is important for all metrics to be meaningful outputs of Metro's model, and that Metro's model take into account factors like induced demand when evaluating projected travel time savings, VMT and GHG.

When evaluating costs and benefits of each project, Metro should ensure that each project scope includes compliance with current policies and planning best practices (e.g. complete streets, green design). Consistent with adopted Metro policy, these integral project elements need to be included in all cost estimates from project inception. To the extent practicable, project alternatives in the same corridor should be evaluated to provide comparative cost-effectiveness of the proposed project.

**Mobility:** *Person-hours of delay* suffers from many of the same flaws as the discredited Level of Service (LOS) metric. It assumes an arbitrary ideal speed without consideration of corridor density or land use effects. Model outputs generally undercount induced demand created by increased capacity that negates short-term increased speeds. A better alternative to the somewhat arbitrary delay metric is a metric for *travel time reliability*. Projects that improve reliability by reducing incidents along a corridor, or provide a pricing mechanism to guarantee minimum travel times (e.g. ExpressLanes) should score well by this metric. People should have a reasonable expectation of how long a trip along a corridor should take in order to make informed decisions based on predictable travel times.

**Economy:** Just like the *person-hours of delay* metric, *truck-hours of delay* likewise oversimplifies complicated land use relationships and, unless separated from commuter traffic, will likewise induce demand that negates the projected project benefits. *Truck travel time reliability* is a better metric that ensures the logistics industry is able to account for predictable goods movement costs without unexpected costly delays. *Dollars invested in disadvantaged communities* is an important metric and Investing in Place looks forward to working with Metro staff to refine this metric to ensure these funds benefit the communities they are invested in.

**Accessibility:** When measuring the disadvantaged population served by a highway project, it is important to measure their ability to access it. Communities with low vehicle-ownership cannot access highway projects unless the corridor is adequately served by transit. Highway projects should be measured by the extent to which they create/enhance high-quality walking and biking routes and minimize impacts to local travel (e.g. by reducing local street connectivity). Both highway and transit projects should be evaluated according to the extent to which they increase the number of disadvantaged households served by rapid transit. Both highway and transit projects should improve network connectivity for walking and biking.

**Safety:** Safety is a critical objective for the measure. Consistent with the City of Los Angeles' methodology under Vision Zero, Metro should give greater weight to *fatal and injury* collisions. Transit system safety should explicitly include the safety of transit patrons as they access transit (first/last mile).

**Sustainability & Quality of Life:** These are strong metrics that will evaluate whether the proposed projects are consistent with the GHG reduction goals mandated by AB 32, SB 375, and subsequent Executive Orders. It is important that the entirety of the expenditure plan put

the region on track to meet these GHG and VMT reduction goals. All projects, including highway projects, should be evaluated according to their VMT reduction. Any projects that individually increase GHG emissions should be excluded from the measure.