January 15, 2014

Mr. James C. Ghielmetti, Chair
California Transportation Commission
1120 N Street, Room 2221 (MS-52)
Sacramento, CA 95814

RE: Active Transportation Program

I am writing on behalf of the North State Super Region (NSSR), a partnership representing the sixteen northern California Regional Transportation Planning Agencies (RTPAs). We represent 26% of California’s total land area that contains 37% of California’s state and federal roads. The primary focus of the NSSR is to support economic development, access, and efficient goods movement through strategic transportation network investments.

While on a national level, there were many rural states not in support of the federal Transportation Enhancement or Transportation Alternative Program that is not the case in California. California’s Complete Streets Act requires our local governments to plan, design, operate, and maintain safe, convenient and comfortable travel and access for users of all ages and abilities regardless of their mode of transportation. The Active Transportation Program (ATP) is the funding source for rural counties to meet this directive and improve the quality of life for our residents and visitors.

On behalf of the NSSR, I attended all but one of the ATP workshops, in addition to the Scoring Criteria Subgroup meetings. It was a satisfying and rewarding experience. Although sometimes long and repetitive, everyone who chose to participate had ongoing opportunities to collaborate on the development of the guidelines. The final draft is an accurate accounting of agreements and concessions made during the process.

We support the overall goal of improving safety and the flexibility in defining disadvantages communities. One key reason why rural areas are not as successful in passing sales tax initiatives is the correlation with low median household incomes. Broadening the definition of disadvantaged communities to include this measure is appreciated.

We ask that you honor the work of your staff and wide range of transportation partners that worked on the draft guidelines by preserving the working group’s recommendation with respect to distribution of the funds (page 2-3). In particular, we urge you to keep the requirement that “projects within the boundaries of a MPO with an urban area with a population of greater than 200,000 are not eligible for funding in the Small Urban or Rural programs”. There is consensus that the ultimate goal is to program the best projects statewide. Maintaining this language will give small MPOs and rural areas a fair chance in the competitive process for the smallest allocation of funds, just under $12 million per
year. It could be that David beat Goliath because someone handed him the rock. These meager funds are our rock and will safeguard a geographic distribution of funds. Please keep in mind that the large MPOs have the ultimate advantage by running their individual programs after the statewide competition. It is understood that this is a consequence of the timely use of funds. We request that in future programs, the large MPOs, with guaranteed formula shares, select those projects in advance of the small urban/rural and statewide competitions.

What is missing from the guidelines is a meaningful role of small MPO and non-MPO RTPAs. Our ultimate directive is to develop regional priorities and breakdown jurisdictional silos. Our role in programming street and highway projects is clear. It does not make sense that we have a limited role for bicycle and pedestrian projects. It is our recommendation that each small MPO and RTPA should evaluate proposed projects against a regionally prioritized program of projects.

Finally, we recommend that small urban and rural agencies be represented on the evaluation committees. Thank you for your consideration of these comments and recommendations.

Sincerely,

[Signature]

Marcella Clem, Chair
North State Super Region

cc: Members, California Transportation Commission
    Brian Kelly, Secretary, California Transportation Agency
    Brian Annis, Deputy Secretary, California State Transportation Agency
    Ms. Arwen Chenery, Office of Senate Pro Tempore Darrell Steinberg
    Mr. Mark Ibele, Senate Budget and Fiscal Review Committee
    Mr. Christian Griffith, Assembly Budget Committee
    Ms. Erica Martinez, Assembly Speaker’s Office
    Ms. Erin Riches, Senate Transportation and Housing Committee
    Ms. Janet Dawson, Assembly Transportation Committee
    Mr. Ted Link-Oberstar, Senate Office of Research
    Mr. Malcolm Dougherty, Director, California Department of Transportation
    Mr. Andre Boutros, Executive Director, California Transportation Commission
    Mitch Weiss, Deputy Director, California Transportation Commission