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October 30, 2015

Randall Winston  
Acting Executive Director  
California Strategic Growth Council**COMMENTS ON DRAFT 2015-2016 AFFORDABLE HOUSING AND SUSTAINABLE COMMUNITIES PROGRAM GUIDELINES**

Dear Mr. Winston:

We appreciate and thank you for your effort to continue to evolve this important program. In particular, we and our partners in the transportation community and the Los Angeles region have raised several areas for improvement in the program that you have addressed through the latest round of guideline revisions, including providing a clear incentive for the inclusion of meaningful active transportation improvements in project applications.

Our interest in this program is in assuring that resources are invested in high value transportation investments that complement the growing transit system in our County, and that foster the type of collaboration and comprehensive community-scale investment that the program envisions. As you know, we are working closely with our partners and stakeholders to develop a strategy that will foster high quality project applications and realize the objectives of this program in Los Angeles County. Our comments at this time are geared toward assuring that this shared vision for the program is realized.

In that vein, we would like to make the following suggestions for revising and strengthening the current draft program guidelines:

**-Reinstate the requirement that TOD area applications include a transportation infrastructure component.** While we understand the desire to allow for more flexibility in crafting applications, we fear that leaving transportation infrastructure as optional will short-cut potentially fruitful partnerships, and we are not confident that the point based incentive for including transportation components will be sufficient. Further, we simply disagree with the assertion that areas served by high quality transit do not need additional investment. To the contrary, these areas often suffer from poor connectivity and multi-modal access. Emphasizing improvements in this area will have a profound effect on greenhouse gas emissions.

**-Clarify the distinction between transportation infrastructure and transportation amenities.** We appreciate the desire to create different levels of investment in transportation, but this component of the program could be strengthened through more clear definitions. In particular, full service bicycle hubs and bike share stations are designed and implemented by Metro as extensions of the transit system which will impact access and mode split. These should be clearly defined as transportation infrastructure.

**-Partnership and collaboration points.** We strongly support the notion that housing and transportation collaboration should be rewarded with points in the competitive process, as reflected by our comments on prior program guidelines. We also agree that a \$1 million threshold creates an aggressive goal for transportation investment. However, this approach

may prove to be too inflexible to reward meaningful collaboration in most instances. We are concerned that transportation agencies may not have a ready supply of planned and unfunded projects at that level. As an alternative we would suggest either awarding partial points at a \$500,000 threshold or rewarding collaboration points based on a more qualitative standard that would assess meaningful participation of the transportation partner.

**-CEQA.** We appreciate the improved language on project readiness for transportation projects and flexibility on project that will be CEQA exempt. We feel this provision can be strengthened further by clarifying how a project applicant can demonstrate the likelihood of a CEQA exemption (such as citing similar prior projects or submitting a statement from a third party expert). It should be clear to public sector entities involved in an application that representations on a project do not pre-judge their formal CEQA process, even if that process is likely to result in a Notice of Exemption or a Negative Declaration.

**-Urban Greening .** We applaud the new emphasis on greening components in the current draft guidelines. As you know, Metro has recently completed an SGC funded planning effort that establishes the importance of green infrastructure in a transit-supportive environment. This portion of the AHSC program, though, could be strengthened through additional definition and clarity. We would recommend a clear preference for greening components that are: a) on public property, b) permanent with maintenance commitments, and c) consistent with or based on a plan that considers larger scale hydrology, heat reduction, and other greening needs.

Thank you again for your consideration, and for the great progress that is being made on this important program. We urge you to view Metro as your partner in assuring the success of this program. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Martha Welborne". The signature is written in a cursive, flowing style.

Martha Welborne, FAIA  
Chief Planning Officer