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The Honorable Toks Omishakin
Secretary
California State Transportation Agency
915 Capitol Mall, Suite 350B
Sacramento, CA 95814

**COMMENTS ON 2022 TRANSIT AND INTERCITY RAIL CAPITAL PROGRAM
CYCLE 6 DRAFT GUIDELINES FOR GENERAL FUND AUGMENTATION**

Dear Secretary Omishakin:

Thank you for the opportunity to comment on the California State Transportation Agency's (CalSTA) 2022 Transit and Intercity Rail Capital Program (TIRCP) Cycle 6 Draft Guidelines for General Fund Augmentation. The Los Angeles County Metropolitan Transportation Authority (Metro) is the transportation planning, programming, construction, and transit operation authority for Los Angeles County. Metro is the largest transit agency in California by ridership, servicing more trips than the next two largest transit agencies combined. Located in the South Coast Air Basin, Los Angeles County is in non-attainment for particulate matter and ozone and currently has the nation's worst air quality – resulting in great part from our traffic congestion, which is the worst in California. Los Angeles County is also home to the state's most priority populations (disadvantaged communities, low-income communities, and low-income households) that who primarily rely on Metro's transit service to access employment, medical, educational, and other ladders of opportunity and services.

We appreciate our ongoing partnership with your agency and recognize how prior TIRCP grants awarded by CalSTA – approximately \$1.5 Billion for 11 projects in total – have helped Metro to leverage locally-generated sales tax dollars – most notably from Measures R (2008) and M (2016) – to advance several of the agency's major transit capital projects that serve our communities seeking clean, safe, and reliable transit service. As a "Self-Help County," Los Angeles County voters have approved a total of four half-cent sales taxes since 1980 to help fund the planning and implementation of transportation projects and programs that help Metro and CalSTA address our myriad goals and objectives for mobility, equity, air quality, climate, and economic growth for the county and the state and uplift the most disadvantaged communities in need of clean, quality transportation options.

By working together, Metro and CalSTA can deliver transformative capital projects that will modernize California's transit systems to significantly reduce emissions of greenhouse gases (GHG), vehicle miles traveled, and congestion. Metro is supportive of CalSTA's 2022 TIRCP Draft Guidelines in its effort to achieve these goals, as well as other key statewide goals related to equity, economic development, and job creation. In support of our partnership, we offer the following comments on CalSTA's 2022 Cycle 6 Draft Guidelines for your consideration:

1. Metro appreciates CalSTA's encouragement for applicants to identify what role the expected FY23-24 and FY24-25 TIRCP formula funding identified in Senate Bill (SB) 198 of the Budget Act of 2021 can play in addressing funding needs for "Existing TIRCP Projects." Cycle 6 funds and the two subsequent TIRCP formula funding opportunities will help applicants deliver complex, large-scale transit projects that require additional funding and flexibility.

CalSTA should allow County Transportation Commissions, Regional Transportation Planning Agencies, and Metropolitan Planning Organizations (as applicable) to include multi-cycle funding plans in their grant applications that include TIRCP formula funding to be appropriated in FY23-24 and FY24-25 in addition to FY22-23 Cycle 6 funds to deliver an "Existing TIRCP Project." The combination of discretionary TIRCP funding from AB 180 and future formula TIRCP funding to be appropriated in FY23-24 and FY24-25 would allow for a multi-cycle/multi-year programming of TIRCP funds that will support larger-scale "Existing TIRCP Projects" that the state has already identified as generating great mobility, environmental, and air quality benefits for these regions and California.

2. CalSTA should not limit eligibility to seek supplemental TIRCP awards from the "Existing TIRCP Projects Leveraging Federal & Local Funds Reserve" category to only projects that would leverage future local or federal funds. CalSTA should expand the eligibility to include projects with previous funding commitments for prior segments of the overall project from local revenue measures adopted by Self-Help counties.

Self-Help Counties, such as Los Angeles County, have greatly supported the development of the state's transportation system by making numerous financial commitments through voter-approved sales tax increases and other initiatives to support the delivery of much-needed transit capital projects that, in turn, move California forward by spurring economic development, reducing GHG emissions, and increasing regional mobility and accessibility to jobs and other opportunities, especially for residents of disadvantaged communities. Like other Self-Help Counties, Los Angeles County successfully raised voter-approved funds by promising our residents that they would serve as a down payment on future state funding commitments. Metro strongly urges CalSTA not to dismiss that act of good faith by allowing only "future" funds to be considered in its definition of "leveraging" new, windfall Cycle 6 TIRCP funds allocated from the General Fund surplus.

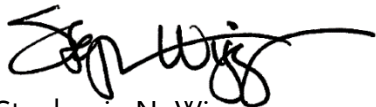
3. CalSTA should allow recipients of prior TIRCP grant awards that apply for supplemental TIRCP grant awards from the "Existing TIRCP Projects Leveraging Federal & Local Funds Reserve" category to have as much flexibility as is needed to encumber and liquidate awarded Cycle 6 TIRCP funds before the June 30, 2027, statutory deadline specified in AB 180 and included in the draft guidelines.

Such flexibility would allow Metro and other agencies to expedite project delivery, leverage federal funds, and meet the statutory deadline for the encumbrance and liquidation of supplemental TIRCP Cycle 6 awards. This flexibility supports options such as employing a programmatic approach and a tapered funding contribution like what is allowed by federal grantor agencies.

4. CalSTA should prioritize applicants for the TIRCP Cycle 6 awards that demonstrate a commitment to workforce development and small business opportunities by identifying inclusive procurement programs.

On behalf of the Metro Board of Directors, I appreciate your consideration and response to our comments, which we hope will strengthen the 2022 TIRCP Guidelines for General Fund Augmentation. Thank you for your continued commitment to working collaboratively with Metro to uplift our LA County residents by leveraging state and local funding to deliver our vital transit projects. Should you have any questions about these comments, please contact Laurie Lombardi, Senior Executive Officer for Countywide Planning and Development, at lombardil@metro.net or 213-418-3251.

Sincerely,

A handwritten signature in black ink, appearing to read 'Step Wiggins', with a long horizontal flourish extending to the right.

Stephanie N. Wiggins
Chief Executive Officer
Los Angeles County Metropolitan Transportation Authority

C: Metro Board of Directors