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**Tab 25**

August 8, 2018

Ms. Susan Bransen  
Executive Director  
California Transportation Commission  
1120 N Street MS 52  
Sacramento, CA 95814

**RE: Adoption of the 2019 Active Transportation Program Regional Guidelines-  
Disadvantaged Communities Criteria**

Dear Ms. Bransen:

At its August 15-16, 2018 meeting the California Transportation Commission (CTC) will be acting on the 2019 Active Transportation Program (ATP) Regional Guidelines for six of the ten Metropolitan Planning Organizations (MPOs) responsible for programming ATP funds to projects in the MPO competitive component of the ATP. This action will include the approval of regional definitions for disadvantaged communities as allowed for in the statewide ATP guidelines adopted by the CTC in May 2018. While we understand the reasoning for several of these MPO requests to approve regional definitions for disadvantaged communities—to stay competitive with other regions that have developed expanded definitions—we find that the concept of regional or local definitions remains inappropriate for a statewide competition and seek to return to using only statewide definitions in future cycles of the ATP.

Under the current ATP guidelines, an applicant may qualify the community served by their project as a disadvantaged community using six different criteria of which four provide a basis for statewide comparison and two rely on regional or local measures. The latter two, the “Regional Definition” and “Other” criteria, allow for disadvantaged communities to be defined on a regional or local basis and thereby excuse counties from using a consistent, objective criterion. This conflicts with the intent of Senate Bill 99 (SB99), as well as Senate Bill (SB 535), to hold a statewide competition and ensure state funds benefit disadvantaged communities. As a result of the growing number of regional definitions in use for the ATP, there is increasing uncertainty as to whether ATP funds will actually benefit California’s most disadvantaged communities. Regions around the state are, understandably, jockeying to modify the criteria beyond a statewide investment focus in order to benefit their areas specifically—with the intent of geographically dispersed investment outcome, rather than one driven by a needs based objective. But this element of the ATP is not intended to be a formula, “return to source” funding program. It is meant to be competitive, recognizing that all regions will not, in fact, perform the same as others. That is the point— and overlaying regional or local criteria to essentially redirect funds to a broader base will result

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in the most disadvantaged communities in the state losing out on this vital investment. The state must remain objective and focused on how it invests into communities of need.

Los Angeles County is home to 47% of the California residents that live in the top quartile of disadvantaged areas in the state according to the California Communities Environmental Health Screening Tool 3.0. On a daily basis they are confronted with the worst health impacts of various types of pollution, but are equipped with the fewest resources to address these issues due to income and other impediments. SB 99 states that it is the intent of the Legislature for disadvantaged communities to share fully in the benefits of the Active Transportation Program (ATP) and consequently requires 25% of ATP funds go to projects that benefit disadvantaged communities. It is important that these funds are truly directed to the most disadvantaged communities in the state, based on a standardized definition. We believe the current ATP guidelines do not fully support this outcome due to the permitted use of tailored Regional Definitions for disadvantaged communities.

We are committed to work with the CTC and the MPOs across the state to eliminate all regional definitions and return to using only statewide definitions that ensure fairness by comparing all regions objectively according to the standardized metrics that identify disadvantaged areas—a return to the intent of SB 99 to target investments to the state's communities of greatest need. We look forward to working with your staff and our regional partners in the next cycle to ensure that we can all collectively support the active transportation needs of California's most disadvantaged communities. Should you have any questions regarding these comments, please feel free to contact Wil Ridder, Executive Officer, at (213) 922-2887 or [ridderw@metro.net](mailto:ridderw@metro.net).

Sincerely,



Therese W. McMillan  
Chief Planning Officer

cc: Laurie Waters, CTC  
Hasan Ikhata, SCAG



August 3, 2018

Laurie Waters, Associate Deputy Director  
California Transportation Commission  
1120 N Street, MS-52  
Sacramento, CA 95814  
[laurie.waters@dot.ca.gov](mailto:laurie.waters@dot.ca.gov)

**VIA E-MAIL**

**Re: Recommendations for Regional Disadvantaged Communities Definitions in the Active Transportation Program (ATP)**

Dear Ms. Waters,

On behalf of the undersigned organizations, we commend the California Transportation Commission (CTC) and your leadership in the implementation of the Active Transportation Program (ATP) as a comprehensive statewide commitment to expand safe, active travel--especially for disadvantaged communities, schools, and residents. In response to the recent approval of numerous regional disadvantaged communities definitions for the ATP Cycle 4, we have outlined several recommendations to strengthen the program to maximize the benefits of the program for all Californians:

**Remove the Regional Disadvantaged Communities (DAC) Definitions in ATP Cycle 4 or Disallow Severity Points for Regional DAC Definitions**

Beginning in the ATP Cycle 3, the CTC created additional tiers of disadvantage severity to ensure that the program's investments were reaching the state's most disadvantaged communities. Despite the ATP Cycle 4 guidelines requiring that proposed regional DAC definitions be stratified by severity, **the publicly available materials from approved regional DAC definitions do not clearly comply with this requirement.** Most regional DAC definitions that have been approved by CTC staff take a multi-indicator approach that set minimum thresholds to qualify as a regionally-defined DAC; however, none of the approved 7 regional DAC definitions provided a publicly available explanation to disadvantage severity stratification as required by the ATP guidelines. Accordingly, we **urge CTC staff to remove all regional DAC definitions for consideration in ATP Cycle 4. As an alternative, our organizations urge you to disallow severity points for all regional DAC definitions.**

### **Eliminate Regional DAC Definitions for ATP Cycle 5 and Beyond**

While our organizations were supportive of experimenting in ATP Cycles 3 and 4 to allow for regional DAC definitions, we now believe that the currently proffered regional DAC definitions contain so much variability in indicators and methodologies that it renders a statewide approach to investments in DACs difficult, if not downright impossible. For example, the currently approved regional definitions vary vastly in terms of timeliness of data used (SACOG and SANDAG use 2009-2013 ACS, while MTC and SBCAG use 2010-2014 ACS and SRTA uses 2012-2016 ACS data), geographic units of analysis (SRTA and SBCAG use Census block groups, while MTC and SCCRTC uses Census tracts and SACOG uses both Census tracts and block groups depending on the indicator), methodologies for qualifying (some require meeting thresholds in more than one indicator, while others only require meeting a threshold in a single indicator), and degree of stakeholder involvement in the development of the regional DAC definitions.

We are particularly concerned with regional DAC definitions that only require meeting one indicator, particularly when that indicator does not relate to low-income or minority status per Title VI requirements. For example, SBCAG's regional DAC definition allows for census block groups with more than 20% of its population 75 years or older to qualify as disadvantaged without regard to race or income status, resulting in areas such as Montecito to qualify as disadvantaged despite 80.3% of its residents being non-Hispanic white, a median household income of \$138,872, and where 98.4% of households have access to at least one car (and a whopping 76.2% of households have access to at least two cars) per 2012-2016 ACS data. **We believe this is an example of some regions' blatant perversion of the state's intent to invest resources in disadvantaged communities and should not be tolerated by the CTC.** Moreover, our organizations see no added benefit for the ATP to allow a regional DAC definition when the median household income qualifier is an available option. To continue with the Santa Barbara County as an example, of its 91 Census tracts, 22 already qualify not only as disadvantaged but severely disadvantaged per the ATP's median household income qualifier (3 tracts have no data)--meaning a quarter of Census tracts in the County already qualify as disadvantaged per the state's definition.

We believe that the ATP's current menu approach provides enough flexibility to all regions and communities across the state, while also retaining an overarching consistent statewide framework to ensure projects are meaningfully providing benefits to truly disadvantaged communities in alignment with the Program's intent and statutory goal related to disadvantaged communities. Accordingly, until CTC is willing to establish clear minimum guidelines and accepted methodologies for how regions should define their disadvantaged communities, **we respectfully urge you to eliminate regional DAC definitions in ATP Cycle 5 and beyond and to withhold severity points from applications that rely on a regional metric this cycle.** We are more than willing to assist the CTC in defining these minimum guidelines and accepted methodologies and suggest leveraging the expertise of the existing Disadvantaged

Communities subcommittee of the Active Transportation Program Technical Advisory Committee.

We thank you for all your hard work on the ATP and look forward to continuing our partnership to safeguard, strengthen, and improve the program.

Sincerely,

Tony Dang, Executive Director  
California Walks

Angela Glover Blackwell, Chief Executive Officer  
PolicyLink

Jonathan Matz, California Senior Policy Manager  
Safe Routes to School National Partnership

Chanell Fletcher, Director  
ClimatePlan

Linda Khamoushian, Senior Policy Advocate  
California Bicycle Coalition

Encl.

cc:

Susan Bransen, Executive Director, California Transportation Commission,  
[susan.bransen@dot.ca.gov](mailto:susan.bransen@dot.ca.gov)

## Excerpts from Santa Barbara County Association of Government's Regional DAC Definition Submission

### Process

This section evaluates the performance Fast Forward 2040 with respect to social equity and environmental justice measures. The information presented was compiled from multiple sources, including the 2010 U.S. Census, and the 2010-2014 American Community Survey 5-Year Estimates. In compliance with the applicable federal guidelines associated with environmental justice analysis, demographic information is first used to determine areas where concentrations of minority, low-income, low mobility, or low community engagement populations currently live. To identify communities of concern for purposes of this analysis, populations meeting minimum concentrations are shown here, as well as their proximity to transit stops and major transportation routes. Per existing guidance, a concentration of a given population exists if the percentage of minority, low-income, etc., population is meaningfully greater than the percentage of the same group in the general population of the area.<sup>141</sup> Thresholds defining the minimum population percentage needed for a concentration to exist are given in Table 24.

For the purposes of this analysis, concentrations of four, primary "communities of concern" were identified by census block groups through an analysis of demographic and socioeconomic data: minority, low-income, low mobility, and low community engagement populations. It should be noted that these four categories are not mutually exclusive. Population clusters may exist within Santa Barbara County of more than one of the categories, but **only one group had to be present for a census block group to be categorized as a community of concern.** The following table presents the relevant community of concern indicators, definitions, and thresholds defining minimum concentrations associated with each major category.

#### Low-Mobility Populations

High concentrations of existing populations with low mobility as determined by the availability of a vehicle are indicated in downtown City of Santa Barbara, Old Town Goleta, the unincorporated area between the Cities of Buellton and Solvang, central City of Lompoc and northern City of Santa Maria.

- The percentage of households in Santa Barbara County that do not have access to a vehicle is 6.8 percent, or 9,790 households.
- The total number of households in identified communities is 11,667 and 3,000, or 26 percent, of the households are without a vehicle.
- The total population in the identified communities is 30,700 persons.

**High concentrations of existing populations with low mobility as determined by age over 75 years old are indicated in various unincorporated areas of the county, such as Montecito and Hope Ranch in the South Coast and Santa Ynez and Vandenberg Village in the North County.**

- The percentage of the population in Santa Barbara County aged 75 or older is 6.6 percent or 28,300 persons.
- The number of persons over 75 years of age in identified communities is 5,402 or 32 percent of the 16,728 total.

## 2012-2016 ACS Data for Montecito

**Advanced Search - Search all data in American FactFinder**

1 Advanced Search 2 Table Viewer

**B19013** | **MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2016 INFLATION-ADJUSTED DOLLARS)**  
 Universe: Households ⓘ  
 2012-2016 American Community Survey 5-Year Estimates

Table View

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Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that provides estimates for counties, cities and towns and estimates of housing units for states and counties.

Versions of this table are available for the following years:			<b>Montecito CDP, California</b>	
			<b>Estimate</b>	<b>Margin of Error</b>
	1 of 4	Median household income in the past 12 months (in 2016 inflation-adjusted dollars)	138,872	+/-17,740

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**B08201** | **HOUSEHOLD SIZE BY VEHICLES AVAILABLE**  
 Universe: Households ⓘ  
 2012-2016 American Community Survey 5-Year Estimates

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Versions of this table are available for the following years: <b>2016</b> ▶ 2015 2014 2013			<b>Montecito CDP, California</b>	
			<b>Estimate</b>	<b>Margin of Error</b>
	30 of 30	Total:	3,249	+/-192
		No vehicle available	51	+/-28
		1 vehicle available	721	+/-128
		2 vehicles available	1,452	+/-188
		3 vehicles available	656	+/-143
	4 or more vehicles available	369	+/-90	

**United States Census Bureau** AMERICAN **FactFinder**

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1 Advanced Search | 2 **Table Viewer**

B03002 | **HISPANIC OR LATINO ORIGIN BY RACE**  
 Universe: Total population ⓘ  
 2012-2016 American Community Survey 5-Year Estimates

Table View

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Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces county estimates.

Versions of this table are available for the following years:

- 2016** ▶
- 2015
- 2014
- 2013
- 2012
- 2011
- 2010
- 2009

		Montecito CDP, California	
		Estimate	Margin of Error
1	Total:	9,193	+/-603
21	Not Hispanic or Latino:	8,557	+/-590
21	White alone	8,020	+/-588
	Black or African American alone	50	+/-38
	American Indian and Alaska Native alone	14	+/-25
	Asian alone	315	+/-98
	Native Hawaiian and Other Pacific Islander alone	0	+/-17
	Some other race alone	0	+/-17
	Two or more races:	158	+/-71
	Two races including Some other race	0	+/-17
	Two races excluding Some other race, and three or more races	158	+/-71
	Hispanic or Latino:	636	+/-183
	White alone	368	+/-121
	Black or African American alone	0	+/-17
	American Indian and Alaska Native alone	0	+/-17
	Asian alone	17	+/-20
	Native Hawaiian and Other Pacific Islander alone	0	+/-17
	Some other race alone	121	+/-65
	Two or more races:	130	+/-90
	Two races including Some other race	112	+/-86
	Two races excluding Some other race, and three or more races	18	+/-22

Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates