

STEP Public Comment Summary

This document includes a summary of the comments received during the public comment period on the Sustainable Transportation Equity Project (STEP) Draft Requirements and Criteria and CARB’s associated actions/responses. Thank you to all who provided comments. We look forward to continue working with you on the development and implementation of this pilot.

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Overview

Public comment period: February 28 – April 3, 2020

Public comment topic: [STEP Draft Requirements and Criteria](#)

Public comments received: 23

List of commenters:

- The Alliance for Regional Solutions (in partnership with SANDAG)
- Bay Area Air Quality Management District
- Bear River Band of the Rohnerville Rancheria
- City of Los Angeles Mayor’s Office
- City of Riverside
- City of San Diego
- California Transportation Commission
- Gateway Cities Council of Governments
- The Greenlining Institute
- GRID Alternatives
- California Housing and Community Development Department

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- Leadership Counsel for Justice and Accountability
- Lion Electric Company
- Orange County Transportation Authority
- Revel (electric moped company)
- Sacramento Area Council of Governments
- San Francisco Metropolitan Transportation Authority
- Toole Design Group
- Via (rideshare company)
- 4 private citizens

Comments and actions/responses:

The comments received by STEP staff have been aggregated in the chart below. If you do not see your submitted comments reflected in this aggregation, please contact STEP staff at step@arb.ca.gov.

Most Common Comments

Topic	Public Comment	STEP Action/Response
Priority Populations	Open up Implementation Grants to low-income communities.	For the upcoming solicitation, this requirement cannot be changed as it was written into the Low Carbon Transportation Funding Plan , which was approved by CARB’s Board in October 2019. However, we have proposed this update for the Fiscal Year 2020-21 Funding Plan.
Timeline	Delay/extend timeline of solicitation due to COVID-19.	We are currently looking into ways to delay/extend the solicitation, including a potential extension of the encumbrance deadline.
Strategies	- Require fewer activities/strategies for the Implementation Grant (e.g., require only one Clean Transportation Strategy, reorganize or don’t require a Mode Shift Strategy)	Will work on updating and clarifying requirements to minimize what is required for a single grant.

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Topic	Public Comment	STEP Action/Response
	<ul style="list-style-type: none"> - Clarify differences between Clean Transportation and Mode Shift strategies 	
Readiness	<p>Lessen up front planning/readiness required before application to make sure results of community engagement can be honored during implementation. Requirements that will make it difficult to change projects based on community engagement include CEQA, accurate budgeting, having all partners on board at time of grant application or execution.</p>	<p>The intent of the Implementation Grant is to fund applicants that have already completed comprehensive community engagement and developed projects accordingly, so projects should not need to change substantially after grant application/execution. If an applicant has not completed this comprehensive community engagement, they might want to apply for a Planning and Capacity Building Grant to fund that community engagement. However, CARB will look into where we may be able to provide increased flexibility for applicants.</p>
Other Characteristics	<ul style="list-style-type: none"> - Lessen other requirements and instead encourage them via scoring (e.g., consistency with existing plans, community engagement when developing vision statement, pro-affordable housing policies) - Put more focus on other requirements so they feel more integral to the project 	<p>Many of these characteristics do not have a minimum requirement and are only encouraged via scoring. Will clarify this in the solicitation.</p>
Community Inclusion	<ul style="list-style-type: none"> - Strong support for this aspect of pilot - Request for more guidance on how to compensate participants for community engagement, how to complete community engagement while social distancing, how past community engagement activities may be 	<p>Will work on developing this guidance and incorporating quality community inclusion/engagement into all aspects of the solicitation.</p>

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Topic	Public Comment	STEP Action/Response
	<p>used, and how Community Partners should be involved</p> <ul style="list-style-type: none"> - Ensure that community engagement is also a part of other aspects of the proposal such as workforce development, displacement avoidance, and climate adaptation - Emphasize quality over quantity of engagement 	
Extra Points	<p>Mixed feedback on extra points:</p> <ul style="list-style-type: none"> - Some for and some against extra points for CBOs, rural communities, and communities with high VMT - Support for extra points for tribes and communities that lack transportation options - Suggestions for how to measure communities that lack transportation options - Suggestions for additional extra points (e.g., readiness, exceeding resource contribution requirement, future VMT, communities that received planning grants - for future STEP solicitations) - Other suggestions for how to prioritize applicants, including set-asides, technical assistance, and tie-breakers 	<p>Will continue to explore how some of these categories may be measured. Will likely keep extra points as listed as a pilot approach and adapt the categories for extra points in the future if needed. Will also consider these alternatives in any future solicitations.</p>
Flexibility	Support for the flexibility provided in the pilot.	N/A

Comments on Applicants

Topic	Public Comment	STEP Action/Response
Co-leads	Allow under-resourced applicants to apply as co-leads.	While co-leads presents some logistical challenges that we need to figure out how to overcome and may not be able

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Topic	Public Comment	STEP Action/Response
		to happen in time for the upcoming solicitation, we will look into other approaches to support under-resourced applicants that can work within the current partnership structure (e.g., fiscal sponsors).
Community Partners	Clarify how Community Partners should be involved in decision-making and how they relate to other community representative requirements.	Will provide additional guidance and clarification on this in the solicitation.
Community-based Organizations (CBOs)	<ul style="list-style-type: none"> - Support for CBOs being eligible as Lead Applicants and inclusivity of CBO definition - Nonprofit requirement will be challenging for some CBOs like tribes' community based development organizations - Allow CBOs that are not registered nonprofits to participate - Make sure property and business improvement districts are included - Also received support for inclusivity of CBO definition 	CBOs that are Lead Applicants must be registered nonprofits. However, CBOs that are Co-applicants do <i>not</i> have to be registered nonprofits. We will update the solicitation to clarify this.
Organizational Readiness	Include how equity shows up in the applicant's mission, process, implementation, and evaluation.	Will provide more specifics on applicants' organizational readiness to do equity work.
Overlapping Investments	Clarify if there are any communities that are not eligible based on past investments received (e.g., TCC recipients) or if certain communities (e.g., 617 communities) will be prioritized in STEP.	No eligibility restrictions or extra points based on other funding programs are expected at this time.
Partnerships	Support for encouraging proposals with multiple partners, but acknowledge potential inequities of partnerships.	Will consider how the Partnership Agreement and scoring criteria can be used as tools to guard against potential inequities.

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Topic	Public Comment	STEP Action/Response
Statement of Qualifications	Provide more detail on this requirement.	Will include more detail in the solicitation.
Tribes	Clarify how some requests and requirements may change for tribal applicants (e.g., coordination with planning documents, resource contribution, co-applicant requirement).	Will clarify in the solicitation.

Comments on Projects/Costs

Topic	Public Comment	STEP Action/Response
Eligible Costs	<ul style="list-style-type: none"> - Clarify/update admin costs and requirements (e.g., difference between indirect and implementation costs, expand caps) - Include section to clarify ineligible costs 	Will incorporate these suggestions into the solicitation.
Eligible Projects	Suggestions for more eligible projects (or clarification that certain projects are eligible), especially with regard to projects within Mode Shift Strategies, projects focused on rural transportation needs, placemaking projects, and active transportation/micromobility modes.	Will update eligible projects list and clarify where needed based on suggestions.
Encouraged Projects	Some confusion about if STEP will pay for encouraged projects.	Encouraged projects are projects that STEP will not pay for but that nevertheless are important for clean transportation and transportation equity. We will update the term to clarify its intent.
Growth Management Projects	Concerns about unintended consequences of growth management projects.	Will coordinate with Housing and Community Development (HCD) and the Department of

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		Conservation to guard against unintended consequences.
Resource Contribution	- Allow capital funding for other supporting infrastructure projects to count as resource contribution - Clarify which expenses that are allowed as resource contributions are eligible expenses for STEP funds	Will look into this option and will provide this clarification in the solicitation.
Scale	Can Mode Shift strategies (or any projects) occur at scales larger than community-scale?	Will clarify when this is appropriate in the solicitation.
Shared Mobility	Include specific requirements for shared mobility such as employment standards, affordability/accessibility, complement transit.	Will look into making these types of requirements more clear for all applicable project types.
Stacking Funds	Questions about how program relates to other California Climate Investments programs and ability to count funding toward resource contributions.	Will clarify this in the solicitation.

Comments on Other Requirements

Topic	Public Comment	STEP Action/Response
Accessibility	Emphasize importance of accessibility, particularly as it relates to ADA needs and the elderly.	Will incorporate this more thoroughly into the solicitation.
Climate Adaptation and Resiliency	Add air quality as a climate exposure.	Will incorporate.
Displacement Avoidance	Suggestions for more eligible activities.	Will look into updating the eligible activities list based on the suggestions.
Equity and Environmental Justice	- More obvious incorporation of equity/environmental justice and focused benefits of Implementation Grants on disadvantaged communities	Will work on including this language throughout the solicitation, more clearly incorporating equity into the scoring criteria, and updating

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Topic	Public Comment	STEP Action/Response
	<ul style="list-style-type: none"> - More description of how equity of projects will be scored - Suggested updates to transportation equity definition 	the definition based on feedback.
Financial Capacity	<ul style="list-style-type: none"> - Clarify what future documentation will be required of selected recipients. - Provide information on when and how advance pay may be used 	Will provide this clarification in the solicitation.
Longevity	Ask applicants how transit service will be continued once STEP funds are exhausted.	This is incorporated in the Longevity and Lessons Learned section of the document. We will look into providing more clarity on what we are asking for in this component.
Planning Grant	Require evaluation of community engagement/outreach, education on mobility options, report backs on info received from community engagement events.	Will look into how these requirements can be incorporated either for the Planning Grants or for planning/community engagement projects.
Pro-housing	Allow for flexibility to meet pro-affordable housing requirement based on community context.	Will work with HCD to ensure pilot allows for appropriate flexibility.
Safety	<ul style="list-style-type: none"> - Prioritize safety in project selection - Be careful how the term "safety" is used because of potential negative connotations 	Will look into collision reduction as a priority for scoring and will evaluate how the term "safety" is used throughout the solicitation.
Vehicles Miles Traveled (VMT)	Specify that light-duty VMT is the target VMT for reduction, not transit VMT.	Will specify the target VMT for reduction as passenger VMT.
Workforce Development	<ul style="list-style-type: none"> - Support for inclusion of workforce development - Request for more focus on workforce development (e.g., include as overarching objective) and costs to be covered (e.g., full trainee salaries) 	Workforce development is an important aspect of STEP. We will look into other ways to highlight the importance of this component in the solicitation.

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Topic	Public Comment	STEP Action/Response
Public Health	Consider public health impacts and how projects can support public health priorities.	Will take into account short and long-term public health priorities in solicitation.

Comments on Process

Topic	Public Comment	STEP Action/Response
Debrief	Incorporate more proactive debrief structure for applicants that aren't funded.	Will outline the debrief structure in the solicitation and proactively engage Lead and Co-applicants in debriefs.
Future Coordination	Work with CalSTA, CTC, and HCD to ensure ideas within STEP are incorporated into other transportation funding programs (e.g., topic for joint meeting).	Will continue to coordinate with other State agencies on transportation funding programs, including sharing best practices and lessons learned through STEP implementation.
Implementation Grants	Award fewer, larger implementation grants to create more transformative impact in the communities that are selected.	Will consider this as we review and score applications.
Planning Grant Preparation	Pay retroactively for partnership development when applying to planning grants.	This presents some logistical challenges that we won't be able to resolve in time for this upcoming solicitation, but is something we will keep in mind for future solicitations.
Planning Grants	<ul style="list-style-type: none"> - Increase amount available for planning grants, especially early on - Question about how many grants will be awarded 	For this solicitation, we must align planning grant funds available with the amount of funds identified in the LCT Funding Plan, but we will look into this for future years. In order to allow for flexibility to meet the needs of different communities, we have no set number of planning grants that will be awarded, but anticipate that about 10 grants

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		may be awarded based on the funding available.
Proposal Workload	Acknowledge and explain need for amount of requirements/workload associated with proposal.	Will incorporate this into the solicitation.
Scoring	<ul style="list-style-type: none"> - Include equity experts on interagency review panel - Consider how to differentiate between resource-intensive community engagement and authentic community engagement in scoring 	We plan to incorporate State staff with equity expertise from in and outside of CARB on the review panel. And we will evaluate community inclusion scoring criteria with this framework in mind and update accordingly.
Solicitation	Provide clear contact information and clear directions and instructions for how applicants should develop their proposals with separate documents for Planning and Implementation Grants.	We plan on including all of this in the solicitation documents.
Technical Assistance (TA)	Suggestions for focus of TA (e.g., data collection and reporting, community engagement while social distancing)	Will take these suggestions into account when working with selected TA provider to refine scope of work.
Terms and Conditions	Question about availability of general terms and conditions of the grant opportunity.	Final solicitation will include a sample grant agreement with this language. This language will likely be similar to sample grant agreements from previous LCT solicitations.