Draft Measure M Guidelines
Public Comment Index

Via THEPLAN@metro.net
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April 24, 2017

Honorable John Fasana, Chairman
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

RE: DRAFT MEASURE M GUIDELINES

Dear Chairman Fasana:

The San Gabriel Valley Council of Governments (SGVCOG) has reviewed the draft Measure M Guidelines and provides the following comments and recommended changes:

Comment No. 1:
Throughout the document, Metro refers to the term “Project Sponsor” when discussing the programming and use of subregional funds. This term is not defined and opens the door for individual cities or other entities within a sub-region to take the lead in programming specific projects and seeking approval directly from Metro. The SGVCOG feels strongly that sub-regional programmatic funds\(^1\) were established and defined by the sub-regions and any project to be funded under these programs must come to Metro through a programming effort by the sub-regions.

To insure this is accomplished, the Measure M Guidelines should include a provision requiring Project Sponsors to have the concurrence of the sub-region (essentially, the COG’s\(^2\) and joint powers authorities officially identified by Metro as regional planning agencies) prior to being included by Metro in their annual funding plan even if already included in the various adopted Mobility Matrices. To provide this concurrence, each COG should be required to adopt a five-year programming plan for each sub-regional program within their respective sub-region. The five-year programming plan would have to identify specific projects and phasing, allocated funding amounts, and project timing and be submitted to Metro. These programming plans would be required to be updated or amended on an annual basis reflecting executed funding MOU’s and project additions or deletions. Unless prohibited by the adopted guidelines, revenue constraints, or the Measure M ordinance, Metro would be required to adhere to these COG adopted sub-regional programming plans when executing funding MOU’s for specific projects. Should a project included in a COG adopted sub-regional programming plan be denied by Metro, each COG shall have the right to appeal the denial to the Measure M Oversight Board. Attachment A provides a flowchart of the proposed process.

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\(^1\) This does not apply to “Major Projects” identified in Measure M, for which Metro serves as the project sponsor.

\(^2\) Throughout this letter the term “COG” is intended to reference both Councils of Governments and joint powers authorities that are identified by Metro as regional planning agencies.

San Gabriel Valley Council of Governments
1000 South Fremont Avenue, Unit #42 • Alhambra, California 91803
Comment No. 2:
The guidelines allow for “Project Sponsors” to borrow from one Sub-Regional Program to accelerate the funding of a project in another Sub-Regional Program with the consent of the Metro Board and the “affected sub-region(s)”. The SGVCOG appreciates this flexibility, but would like to see language that requires the affected sub-regions to approve the proposed borrowing, by amending their affected adopted sub-regional programming plans as defined in our comment No. 1, to reflect the transfer of funds and acknowledging the associated timing impact for projects included in those sub-regional programs.

Comment No. 3:
The guidelines state that Measure M funds may be used for pre-construction as well as construction activities. Pre-construction activities are defined in the guideline and include “planning studies”. The SGVCOG recommends that this term be expanded to “planning and programming studies”. Adding the term “programming studies” will allow the sub-regions through their respective COGs to develop sub-regional project lists for corridor planning and coordination, and for subsequent project development and delivery. This will ensure that proposed projects complement each other and maximize mobility and/or sustainability.

Comment No. 4:
The Measure M Guidelines regarding Sub-Regional Equity funds state that Metro may meet these obligations using “any combination of federal, state or Metro controlled funds including, but not limited to, Measure M.” SGVCOG appreciates the need for this flexibility, however this flexibility being sought by Metro potentially places significant grant compliance requirements on sub-regions that may conflict with proposed projects or uses of those funds. The guidelines should be revised to not allow Metro the ability to unilaterally determine that a sub-region’s funding requirement under the “Sub-Regional Equity Fund” be met with something other than Measure M. Such a funding substitution should only be allowed with the affected COG (sub-region’s) concurrence. In addition, the SGVCOG requests that uses of the “Sub-Regional Equity Fund” be expanded to include the use of these funds for bonding capacity to accelerate proposed projects within the other sub-regional programs.

Comment No. 5:
The definition for eligible uses for the “Highway Demand Based Program” should include park and ride facilities, as well as other ridesharing related facilities.

Comment No. 6:
Under the section “3% Local Contribution to Major Transit Projects”, the guidelines state that “betterment work” funded by the local agency and as defined as “a change that will improve the level of service and/or capacity, capability, appearance, efficiency or function over that which is required by the Metro Design”, shall not be counted towards the 3% required local contribution. The SGVCOG disagrees with this exclusion and would like to see the guidelines amended to allow such betterment work to be counted towards the 3% local contribution. Any capital investment that enhances and improves the operation of the transit system and funded by a local agency should be desirable to Metro and should not
be discouraged by not allowing this type of betterment work to be counted towards the required 3% contribution.

Comment No. 7:
Under the section “3% Local Contribution to Major Transit Projects”, “in kind” local contributions as defined should include the cost of staff time from the commencement of the environmental phase through the end of the warranty period.

Comment No. 8:
Under the section “3% Local Contribution to Major Transit Projects”, local contribution limits are determined at the conclusion of preliminary engineering (30% plans). The guidelines need to have language to address projects that have already exceeded this point such as the Gold Line Foothill Extension. How will local contribution be determined for that project? SGVCOG suggests that language be added that states for projects that have exceeded preliminary engineering as of the initial adoption of the these Measure M guidelines, Metro shall consult with the local affected agencies to determine the appropriate project scope and cost estimate to determine the local contribution limits.

Comment No. 9:
Under local return, Metro is currently recommending a $100,000 annual minimum allocation for small population cities that would normally receive less than this amount. The SGVCOG does not object to this proposal, however is not in favor of increasing this amount beyond the current recommended $100,000 minimum.

Comment 10:
Upon the approval of the Measure M Guidelines and the initiation of project funding MUO’s, the SGVCOG requests that they be included in all communications from Metro to Project Sponsors related to the allocation and use of sub-regional funds assigned to the SGVCOG’s sub-region.

Sincerely,

Cynthia Sternquist, President
San Gabriel Valley Council of Governments

cc: SGVCOG Board of Directors
    Metro Board of Directors
    Phillip Washington, CEO, Metro
SGVCOG proposed project funding approval process for sub-regional funds

COG's adopt a five-year programming plan for each sub-regional program within their respective sub-region. The plan will identify specific projects and phasing, allocated funding amounts, and project timing.

COG adopted five-year programming plans are submitted for approval by Metro Board

Upon approval by Metro Board, project sponsors may apply for funding MOU's based on adopted five-year sub-regional fund programming plans

COG's update or amend their adopted five-year programming plans on an annual basis reflecting executed funding MOU's and project additions or deletions and submit for approval by Metro Board.
To Whom it May Concern:

Attached is a letter from the South Bay Cities Council of Governments (SBCCOG) to Metro Chairman John Fasana regarding the proposed Measure M guidelines. Should you have any questions, please contact SBCCOG Executive Director Jacki Bacharach at 310-371-7222 or Jacki@southbaycities.org.

Sincerely,

David Leger
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Mobility and Board Secretary
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SOUTH BAY CITIES
COUNCIL OF GOVERNMENTS
SOUTH BAY
ENVIRONMENTAL SERVICES CENTER
May 9, 2017

Honorable John Fasana, Chairman
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

RE: South Bay Cities Council of Governments’ Recommended Changes in Measure M Guidelines

Dear Chairman Fasana:

The South Bay Cities Council of Governments (SBCCOG) appreciates the opportunity to partner with Metro in the development of Measure M Guidelines. We support Metro’s goal of delivering Measure M projects efficiently and expeditiously. We believe implementing the following recommendations will be integral towards meeting Metro’s stated goals while concurrently creating flexibility and improvements in Metro’s Sub-regional and Local partnerships. Thirteen of our comments refer to text on specific pages in the draft guidelines. The remaining two comments relate to new concerns for which we could not identify a specific page reference. We request that the Guidelines be modified to capture the following priorities:

Multi-year Sub-Regional Program (MSP) Guidelines

The majority of the SBCCOG’s recommended changes focus on a common major theme that the draft guidelines do not recognize a central role for the COGs in developing and delivering the sub-regional programs and projects that are specified in the Measure M Ordinance.

1. (p. 14-15) The draft guidelines appear to make sub-regional capital funds subordinate to other Metro priorities with the potential consequence that funding will be delayed or unavailable in the first two decades. There is nothing in the ordinance that supports that interpretation. Sub-regional capital funds should not be considered subordinate obligations that are conditionally programmed funding after Metro Administration, Transit Operating & Maintenance; and Local Return / Regional Rail Sub-fund needs are met. By definition, Multi-Year Sub-Regional Programs (MSPs) are neither Local Return nor Regional Projects and Programs. These commitments need to have the same priority for programming as the other primary funding categories listed in the Ordinance. A discrete amount of Measure M funding was included in the Measure M Expenditure Plan Attachment A for each sub-regional program. COGs and lead agencies need assurance that Metro will allow projects to have the funding that they need to proceed from development to delivery. In addition, Measure M MSP funds should receive the same consideration for bonding and borrowing as major regional capital projects.

2. (p. 22) Sub-regions should be able to use Measure M funding for the entire life of a project - to develop sub-regional projects lists, for corridor planning and coordination, and for subsequent project

LOCAL GOVERNMENTS IN ACTION

Carson  El Segundo  Gardena  Hawthorne  Hermosa Beach  Inglewood  Lawndale  Lomita
Manhattan Beach  Palos Verdes Estates  Rancho Palos Verdes  Redondo Beach  Rolling Hills
Rolling Hills Estates  Torrance  Los Angeles District #15  Los Angeles County
development and delivery. These early steps should all be considered pre-construction activities. They allow the sub-region to ensure that projects complement each other and maximize mobility and/or sustainability. These funds should be available to the COG and the lead agencies to get the projects ready. COGs should also be allowed to use Sub-regional funds to assist lead agencies in preparing project applications for any applicable federal, state and regional transportation grant programs that are consistent with Measure M eligibility requirements. In addition, Sub-regional Highway Sub-funds should be eligible for the project development process for projects that were not included in the pre-election Mobility Matrices.

3. (p. 22) The Measure M Guidelines currently envision a regional programming approach similar to the current Metro Call for Projects in which local jurisdictions must use their Local Return funds to develop projects for consideration by Metro. We recommend that sub-regional projects be funded through Measure M for project development and delivery and be prioritized and sequenced for Measure M and other matching funds in a manner similar to the current process used by Metro and the South Bay Cities Council of Governments (SBCCOG) for the successful Measure R South Bay Highway Program (SBHP). We believe this model allows better efficiency and sub-regional customization than what is currently proposed in the draft guidelines with local jurisdictions being part of the development of projects, the SBHP process currently employed for project development ensures project acceptance by local jurisdictions.

4. (p. 22) Metro should hold the sub-regions accountable for complying with the ordinance but it should not establish criteria beyond those needed to ensure legal compliance with the ordinance. For example, under current Measure R regional programs and in the model proposed in the draft Measure M Guidelines, Metro retains the authority to unilaterally disallow or defer a project that has been included in a sub-regional list. While this may be appropriate for the regional programs in Measure R, it is not appropriate for Measure M sub-regional programs in which the allocation of funding and eligibility criteria should be the purview of each sub-region, not Metro especially since the Sub-regional program is the product of early collaboration between the lead agencies in each sub-region. To clarify the process that we believe should be used to develop, fund, and deliver Sub-regional Measure M projects, we have attached a flow chart of the steps we believe appropriately involves Metro, lead agencies and the COGs.

5. (p. 25) MSP Highway Sub-Fund Guidelines state, “It is expected that local jurisdictions will contribute to total project costs.” Local funding was not required in the Ordinance for sub-regional projects. It is unrealistic and inequitable to require Local funds for sub-regional projects when such uses were not called out in the Measure M Ordinance. Sub-regional projects should not require a project sponsor match. No additional local investments in sub-regional projects should be required during the planning, development, design, right-of-way, or construction phases of a sub-regional project.

6. (p. 16) The Guidelines for the MSP allow lead agency project sponsors to borrow from one MSP Program to fund a different MSP project sub-fund that may not be available until a later year with the consent of the Metro Board and the “affected sub-region(s)”. Although the flexibility is appreciated, the Guidelines language should be changed to explicitly require consent of the “affected Council of Government(s)”. The Guidelines should also describe the basis and process for obtaining COG and Metro Board approval of the request. There should be language added that ensures that Metro will not approve loans without prior COG approval and that such approval will not be unreasonably withheld by the COG or METRO.
7. (p. 26) For projects using Measure M Highway Efficiency and Operational Improvement Sub-regional funds, Metro and the relevant COG should review project applications and clarify any items necessary with the project sponsor to determine project readiness and eligibility for pre-construction or construction activities. Authorization to proceed should require concurrence of the COG and Metro Boards of Directors. (p. 27) Examples accompanying the definition of eligible Highway Efficiency and Operational Improvements should include Traffic Signalization / Communications with Motorists Improvements and Autonomous-vehicle-to-infrastructure communications improvements.

8. (p. 52) The Measure M Guidelines regarding Sub-Regional Equity funds should not allow Metro to meet its obligations using "any combination of federal, state or Metro controlled funds including, but not limited to, Measure M." This flexibility being sought by Metro potentially places significant grant compliance requirements on sub-regions and lead agencies that were not specified in the Measure M Ordinance. Sub-regions may choose to leverage their Measure M funding with other grant sources, but such a decision should not be imposed by any unilateral Metro decision. The guidelines need to require the agreement of the affected COG(s) that they can accommodate the requirements of funds from other sources. Borrowing or bonding against future Measure M revenues to fund the Sub-Regional Equity Funds should be considered in keeping with the ordinance directives.

9. (p. 52) Sub-regional Equity projects should be developed using the sub-regional process led by the COGs rather than using the Metro-centric process based on "project readiness". The Guidelines for the Sub-Regional Equity Sub-funds should not impose any special category-specific project readiness or local contribution requirements. In addition, consistent with the Metro Board action that created the Sub-Regional Equity program, these funds should be available at the same time Metro funds the West San Fernando Valley sub-regional equity project.

Other Measure M Funding Category Guidelines - Addressing Innovation

10. (New) Throughout the Guidelines Metro has called for flexibility to allow innovation and the ability to respond to changes in future mobility options and strategies. In support of broader eligibility in the guidelines, the adopted Metro/SCAG First/Last Mile Strategic Plan clearly calls for this flexibility with the following statement, "The proliferation of personal mobility devices by all age groups, from skateboards to bicycles to electric mobility scooters, presents a tremendous opportunity to extend the reach of public transit investments. It is well known that the time it takes to walk to a station is the metric by which access sheds are realized. Supporting personal mobility devices that allow an aggregate increase in personal mobility speeds can dramatically increase regional access sheds. Better policies, new infrastructure and a careful look at mode integration is needed when assessing how best to realize the potential offered by the growing range of mobility options." The Guidelines should incorporate this flexibility.

11. (p. 37) The First/Last Mile Measure M Guidelines should include as eligible programs, strategies that eliminate trips or support ridesharing. In the last sentence of the section, "information and technology that eases travel...", the guidelines should also specify transportation demand management strategies as eligible. This would allow Measure M to be used for a broad range of communications technology applications and for innovative mobility approaches like smart transit applications, slow speed lanes, and citywide gigabit fiber to homes and businesses.

12. (New) Because innovation is occurring in real time, all sub-regional funding programs and regional programs (such as First/Last Mile, Active Transportation, and Visionary Seed Funding) should be written
to allow a broad range of emerging communications technologies and mobility options that will improve access to transit or eliminate single-occupant trips. In addition to innovative transit and shared-ride programs, the guidelines should allow Measure M funding to be used for emerging and future transportation demand management strategies including smart city technologies, broadband connectivity for residences and businesses, electric-powered neighborhood vehicles and charging infrastructure, slow speed lanes and smart neighborhoods. Lead agencies for these innovative strategies should not be restricted and should be encouraged to partner with Metro, local jurisdictions including their transit operators, COGs/JPAs, non-profit organizations and public/private partnerships.

13. (p. 48) The Visionary Project Seed Funding Guidelines currently limit applicants to L. A. Metro, Municipal Operators, and local operators. Applicants are also encouraged to identify one or more research partners. SBCCOG recommends that funding in this category be made available to any organization that presents a visionary project idea (e.g.: Metro and other transit operators, COG’s, non-profit organizations, academic institutions, and for profit organizations). The Guidelines also require a minimum of a 40% local match which may dissuade visionary projects from being proposed and may be difficult for some of the eligible applicants to meet. The match should be no more than 20% and the Guidelines should allow for in-kind contributions including staff efforts by all partners to be counted toward the match.

14. (p. 81) The Local Return Guidelines refer to using Measure M for taxi services. References to taxis should be expanded to include shared-ride hailing services.

Measure M Administrative Guidelines

15. (p. 10) The Guidelines allow the Metro Board to change the Sub-regional boundaries starting in 2047. These guidelines should require concurrence from the sub-regions.

16. (p. 10) The Guidelines should add COGs to the recipients currently listed to receive any Notices of Public Hearing related to changes to or amendment of the Measure M Guidelines.

In summary, the SBCCOG supports incorporating these policies into the draft Guidelines which would ensure that they are more equitable and would improve the prospects for efficient and timely use of the Measure M funds. Please contact us if you would like additional clarification on any of the changes we are advocating.

Sincerely,

[Signature]

James Osborne, Chair
South Bay Cities Council of Governments
Councilmember, City of Lawndale

c.c.:  SBCCOG Board of Directors
       L. A. Metro Board of Directors
       Phillip Washington, CEO, L. A. Metro
       COGs of Los Angeles County
SBCCOG's proposed Measure M Sub-regional Project funding approval process

- Metro provides a five-year Measure M funding estimate for each sub-regional program.
- COG's adopt a five-year programming plan for each sub-regional program within their respective sub-region. The plan will identify specific projects and phasing, allocated funding amounts, and project timing.
- COG adopted five-year programming plans are submitted for approval by Metro Board.
- Upon approval by Metro Board, project sponsors may apply for funding MOU's based on adopted five-year sub-regional fund programming plans.
- COG's update or amend their adopted five-year programming plans on an annual basis reflecting executed funding MOU's and project additions or deletions and submit for approval by Metro Board.
- Following Metro approval of projects, lead agency and Metro include the relevant COG in all communications regarding project development and delivery.
measures appear to be addressing current issues with SCRRRA which would be reasonable to assume will be resolved by 2039.

- P.65 – In "eligible recipients" for the 2% ADA paratransit allocation, remove the phrase “on behalf of Los Angeles County fixed route transit operators”. This would allow any operator including local dial-a-rides to access funding for ADA.

- P. 82 – Coordination Approach – The language urging the coordination of Measure M Local Return funded projects should be expanded and placed in other guidelines. There should be incentives for interjurisdictional coordination throughout the Guidelines encouraging and maximizing mobility across city boundaries. The Councils of Governments can be an important contributor to viewing mobility through a systems approach.
To Whom it May Concern:

Attached is a letter from the South Bay Cities Council of Governments (SBCCOG) to Metro Chairman John Fasana regarding the proposed Measure M guidelines. Should you have any questions, please contact SBCCOG Executive Director Jacki Bacharach at 310-371-7222 or Jacki@southbaycities.org.

Sincerely,

David Leger
Environmental Services Analyst
Mobility and Board Secretary
(310) 371-7222 ext. 202
South Bay Cities Council of Governments
20285 S. Western Ave., #100
Torrance, CA 90501
May 25, 2017

Honorable John Fasana, Chairman
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

RE: South Bay Cities Council of Governments’ Updated Recommended Changes in Measure M Guidelines

Dear Chairman Fasana:

On May 9, 2017, the South Bay Cities Council of Governments (SBCCOG) submitted the attached letter containing 16 recommendations to improve the Measure M Guidelines. During the ensuing discussions, it has become apparent that the format of the initial letter somewhat obscured a few of the key recommendations that are at the heart of implementing the innovative design of Measure M, which for the first time includes a discrete Sub-regional category of programs and projects in addition to the traditional Regional and Local Return Programs. We believe this new category is a vital cornerstone of the Measure M Guidelines that warrants this letter to amplify its importance to the SBCCOG.

We urge Metro to provide guidelines that provide an integral role for the COGs that wish to lead efforts in their sub-region to develop and deliver the sub-regional programs and projects that are specified in the Measure M Ordinance. To achieve an efficient and expedited implementation program, we believe the following steps should be incorporated in the appropriate sections of the Guidelines:

1. As a new category of funding, the Multi-Year Sub-Regional Programs (MSPs) are distinct from Local Return and Regional Programs and Projects. These commitments need to have the same priority for programming as the other primary funding categories listed in the Ordinance. MSPs should be implemented with the same priority and on the same schedule as Metro Administration, Transit Operating & Maintenance, and Local Return / Regional Rail Sub-fund.

2. A discrete amount of Measure M funding is included in the Measure M Expenditure Plan Attachment A for each sub-regional program. Sub-Regional Funding should be eligible to allow interested COGs to initiate development of the programs and implementation and sub-regional oversight of the projects within each of the programs. COGs and lead agencies need assurance that Metro will allow projects to have the funding that they need to proceed from program development through project delivery. (See process chart attached to May 9 letter) In addition, Measure M MSP programs of projects should receive the same consideration for bonding and borrowing as major regional capital projects.
3. Measure M Sub-Regional funding should be allocated to Interested COGs immediately after adoption of the initial Measure M Guidelines (in June or July 2017) for the preparation and implementation of 5-year Measure M Sub-Regional Plans that would describe the processes and procedures to be used to select, schedule, fund and deliver sub-regional projects. In the South Bay, this plan would include the Measure M Operational Improvements Program, the Mobility and Sustainability Program, and the Sub-Regional Equity Program. Such a plan should include a process that assures project selection, sequencing and policies and processes are clearly described and that perspectives of potential project lead agencies and stakeholders are considered.

These recommendations are intended to amplify, not replace, the detailed recommendations made in our May 9, 2017 letter. We continue to appreciate Metro's collaborative process in developing the Measure M Guidelines.

Sincerely,

[Signature]

James Osborne, Chair
South Bay Cities Council of Governments
Councilmember, City of Lawndale

c.c.: SBCCOG Board of Directors
      L. A. Metro Board of Directors
      Phillip Washington, CEO, L. A. Metro
      COGs of Los Angeles County

Attachment: May 9, 2017 Letter
May 9, 2017

Honorable John Fasana, Chairman
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

RE: South Bay Cities Council of Governments' Recommended Changes in Measure M Guidelines

Dear Chairman Fasana:

The South Bay Cities Council of Governments (SBCCOG) appreciates the opportunity to partner with Metro in the development of Measure M Guidelines. We support Metro's goal of delivering Measure M projects efficiently and expeditiously. We believe implementing the following recommendations will be integral towards meeting Metro's stated goals while concurrently creating flexibility and improvements in Metro's Sub-regional and Local partnerships. Thirteen of our comments refer to text on specific pages in the draft guidelines. The remaining two comments relate to new concerns for which we could not identify a specific page reference. We request that the Guidelines be modified to capture the following priorities:

Multi-year Sub-Regional Program (MSP) Guidelines

The majority of the SBCCOG's recommended changes focus on a common major theme that the draft guidelines do not recognize a central role for the COGs in developing and delivering the sub-regional programs and projects that are specified in the Measure M Ordinance.

1. (p. 14-15) The draft guidelines appear to make sub-regional capital funds subordinate to other Metro priorities with the potential consequence that funding will be delayed or unavailable in the first two decades. There is nothing in the ordinance that supports that interpretation. Sub-regional capital funds should not be considered subordinate obligations that are conditionally programmed funding after Metro Administration, Transit Operating & Maintenance, and Local Return / Regional Rail Sub-fund needs are met. By definition, Multi-Year Sub-Regional Programs (MSPs) are neither Local Return nor Regional Projects and Programs. These commitments need to have the same priority for programming as the other primary funding categories listed in the Ordinance. A discrete amount of Measure M funding was included in the Measure M Expenditure Plan Attachment A for each sub-regional program. COGs and lead agencies need assurance that Metro will allow projects to have the funding that they need to proceed from development to delivery. In addition, Measure M MSP funds should receive the same consideration for bonding and borrowing as major regional capital projects.

2. (p. 22) Sub-regions should be able to use Measure M funding for the entire life of a project - to develop sub-regional projects lists, for corridor planning and coordination, and for subsequent project...
development and delivery. These early steps should all be considered pre-construction activities. They allow the sub-region to ensure that projects complement each other and maximize mobility and/or sustainability. These funds should be available to the COG and the lead agencies to get the projects ready. COGs should also be allowed to use Sub-regional funds to assist lead agencies in preparing project applications for any applicable federal, state and regional transportation grant programs that are consistent with Measure M eligibility requirements. In addition, Sub-regional Highway Sub-funds should be eligible for the project development process for projects that were not included in the pre-election Mobility Matrices.

3. (p. 22) The Measure M Guidelines currently envision a regional programming approach similar to the current Metro Call for Projects in which local jurisdictions must use their Local Return funds to develop projects for consideration by Metro. We recommend that sub-regional projects be funded through Measure M for project development and delivery and be prioritized and sequenced for Measure M and other matching funds in a manner similar to the current process used by Metro and the South Bay Cities Council of Governments (SBCCOG) for the successful Measure R South Bay Highway Program (SBHP). We believe this model allows better efficiency and sub-regional customization than what is currently proposed in the draft guidelines with local jurisdictions being part of the development of projects, the SBHP process currently employed for project development ensures project acceptance by local jurisdictions.

4. (p. 22) Metro should hold the sub-regions accountable for complying with the ordinance but it should not establish criteria beyond those needed to ensure legal compliance with the ordinance. For example, under current Measure R regional programs and in the model proposed in the draft Measure M Guidelines, Metro retains the authority to unilaterally disallow or defer a project that has been included in a sub-regional list. While this may be appropriate for the regional programs in Measure R, it is not appropriate for Measure M sub-regional programs in which the allocation of funding and eligibility criteria should be the purview of each sub-region, not Metro especially since the Sub-regional program is the product of early collaboration between the lead agencies in each sub-region. To clarify the process that we believe should be used to develop, fund, and deliver Sub-regional Measure M projects, we have attached a flow chart of the steps we believe appropriately involves Metro, lead agencies and the COGs.

5. (p. 25) MSP Highway Sub-Fund Guidelines state, “It is expected that local jurisdictions will contribute to total project costs.” Local funding was not required in the Ordinance for sub-regional projects. It is unrealistic and inequitable to require Local funds for sub-regional projects when such uses were not called out in the Measure M Ordinance. Sub-regional projects should not require a project sponsor match. No additional local investments in sub-regional projects should be required during the planning, development, design, right-of-way, or construction phases of a sub-regional project.

6. (p. 16) The Guidelines for the MSP allow lead agency project sponsors to borrow from one MSP Program to fund a different MSP project sub-fund that may not be available until a later year with the consent of the Metro Board and the “affected sub-region(s)”. Although the flexibility is appreciated, the Guidelines language should be changed to explicitly require consent of the “affected Council of Government(s)”. The Guidelines should also describe the basis and process for obtaining COG and Metro Board approval of the request. There should be language added that ensures that Metro will not approve loans without prior COG approval and that such approval will not be unreasonably withheld by the COG or METRO.
7. (p. 26) For projects using Measure M Highway Efficiency and Operational Improvement Sub-regional funds, Metro and the relevant COG should review project applications and clarify any items necessary with the project sponsor to determine project readiness and eligibility for pre-construction or construction activities. Authorization to proceed should require concurrence of the COG and Metro Boards of Directors. (p. 27) Examples accompanying the definition of eligible Highway Efficiency and Operational improvements should include Traffic Signalization / Communications with Motorists Improvements and Autonomous-vehicle-to-infrastructure communications improvements.

8. (p. 52) The Measure M Guidelines regarding Sub-Regional Equity funds should not allow Metro to meet its obligations using “any combination of federal, state or Metro controlled funds including, but not limited to, Measure M.” This flexibility being sought by Metro potentially places significant grant compliance requirements on sub-regions and lead agencies that were not specified in the Measure M Ordinance. Sub-regions may choose to leverage their Measure M funding with other grant sources, but such a decision should not be imposed by any unilateral Metro decision. The guidelines need to require the agreement of the affected COG(s) that they can accommodate the requirements of funds from other sources. Borrowing or bonding against future Measure M revenues to fund the Sub-Regional Equity Funds should be considered in keeping with the ordinance directives.

9. (p. 52) Sub-regional Equity projects should be developed using the sub-regional process led by the COGs rather than using the Metro-centric process based on “project readiness”. The Guidelines for the Sub-Regional Equity Sub-funds should not impose any special category-specific project readiness or local contribution requirements. In addition, consistent with the Metro Board action that created the Sub-Regional Equity program, these funds should be available at the same time Metro funds the West San Fernando Valley sub-regional equity project.

Other Measure M Funding Category Guidelines - Addressing Innovation

10. (New) Throughout the Guidelines Metro has called for flexibility to allow innovation and the ability to respond to changes in future mobility options and strategies. In support of broader eligibility in the guidelines, the adopted Metro/SCAG First/Last Mile Strategic Plan clearly calls for this flexibility with the following statement, “The proliferation of personal mobility devices by all age groups, from skateboards to bicycles to electric mobility scooters, presents a tremendous opportunity to extend the reach of public transit investments. It is well known that the time it takes to walk to a station is the metric by which access sheds are realized. Supporting personal mobility devices that allow an aggregate increase in personal mobility speeds can dramatically increase regional access sheds. Better policies, new infrastructure and a careful look at mode integration is needed when assessing how best to realize the potential offered by the growing range of mobility options.” The Guidelines should incorporate this flexibility.

11. (p. 37) The First/Last Mile Measure M Guidelines should include as eligible programs, strategies that eliminate trips or support ridesharing. In the last sentence of the section, “information and technology that eases travel...”, the guidelines should also specify transportation demand management strategies as eligible. This would allow Measure M to be used for a broad range of communications technology applications and for innovative mobility approaches like smart transit applications, slow speed lanes, and citywide gigabit fiber to homes and businesses.

12. (New) Because innovation is occurring in real time, all sub-regional funding programs and regional programs (such as First/Last Mile, Active Transportation, and Visionary Seed Funding) should be written
to allow a broad range of emerging communications technologies and mobility options that will improve access to transit or eliminate single-occupant trips. In addition to innovative transit and shared-ride programs, the guidelines should allow Measure M funding to be used for emerging and future transportation demand management strategies including smart city technologies, broadband connectivity for residences and businesses, electric-powered neighborhood vehicles and charging infrastructure, slow speed lanes and smart neighborhoods. Lead agencies for these innovative strategies should not be restricted and should be encouraged to partner with Metro, local jurisdictions including their transit operators, COGs/IPAs, non-profit organizations and public/private partnerships.

13. (p. 48) The Visionary Project Seed Funding Guidelines currently limit applicants to L. A. Metro, Municipal Operators, and local operators. Applicants are also encouraged to identify one or more research partners. SBCCOG recommends that funding in this category be made available to any organization that presents a visionary project idea (e.g.: Metro and other transit operators, COG’s, non-profit organizations, academic institutions, and for profit organizations). The Guidelines also require a minimum of a 40% local match which may dissuade visionary projects from being proposed and may be difficult for some of the eligible applicants to meet. The match should be no more than 20% and the Guidelines should allow for in-kind contributions including staff efforts by all partners to be counted toward the match.

14. (p. 81) The Local Return Guidelines refer to using Measure M for taxi services. References to taxis should be expanded to include shared-ride hailing services.

Measure M Administrative Guidelines

15. (p. 10) The Guidelines allow the Metro Board to change the Sub-regional boundaries starting in 2047. These guidelines should require concurrence from the sub-regions.

16. (p. 10) The Guidelines should add COGs to the recipients currently listed to receive any Notices of Public Hearing related to changes to or amendment of the Measure M Guidelines.

In summary, the SBCCOG supports incorporating these policies into the draft Guidelines which would ensure that they are more equitable and would improve the prospects for efficient and timely use of the Measure M funds. Please contact us if you would like additional clarification on any of the changes we are advocating.

Sincerely,

James Osborne, Chair
South Bay Cities Council of Governments
Councilmember, City of Lawndale

c.c.: SBCCOG Board of Directors
L. A. Metro Board of Directors
Phillip Washington, CEO, L. A. Metro
COGs of Los Angeles County
SBCCOG's proposed Measure M
Sub-regional Project
funding approval process

Metro provides a five-year Measure M funding estimate for each sub-regional program.

COG's adopt a five-year programming plan for each sub-regional program within their respective sub-region. The plan will identify specific projects and phasing, allocated funding amounts, and project timing.

COG adopted five-year programming plans are submitted for approval by Metro Board.

Upon approval by Metro Board, project sponsors may apply for funding MOU's based on adopted five-year sub-regional fund programming plans.

COG's update or amend their adopted five-year programming plans on an annual basis reflecting executed funding MOU's and project additions or deletions and submit for approval by Metro Board.

Following Metro approval of projects, lead agency and Metro include the relevant COG in all communications regarding project development and delivery.
Attached please find the comments of the Gateway Cities Council of Governments regarding the draft Measure M Guidelines.

Jack Joseph
Deputy Executive Director
Gateway Cities Council of Governments
May 25, 2017

Mr. John Fasana, Chair, Board of Directors
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza Dr.
Los Angeles, CA 90012

Dear Chair Fasana:

Re: Comments on the Measure M Master guidelines

The Gateway Cities Council of Governments appreciates the opportunity to review and comment on the Draft Master Guidelines for the Expenditure of Measure M tax revenues. We understand the aggressive adoption schedule but are seeking assurance that careful consideration of comments/clarifications will still be forthcoming.

We look forward to an open and comprehensive process for the development of the more specific guidelines that will be developed over the coming years.

Measure R recognized the importance of subregional project delivery and the customized approach each subregion has utilized for project development and implementation. Examples like the Alameda Corridor East Construction Authority, the South Bay Highway Operational Improvement Program and the Gateway Cities I-710 Project Committee and SR-91/I-605/I-405 Committee have been highly successful models of consensus driven subregional project development and implementation.

The subregional effort that created the Measure M Expenditure Plan was also a true “grounds - up” effort that resulted in all subregional priorities accounted for in the Expenditure Plan. The Draft Measure M guidelines pull back from supporting the subregional approach, requiring jurisdictions to either utilize Local Return or other funds for project development. Additionally; project readiness has been identified as the sole determinant of receiving funding within a yearly timeframe. The admonition that the taxpayer funds be spent “as quickly as possible” creates a challenge if not
a disadvantage for highway initiatives that by their very nature have long lead times for implementation.

Gateway Cities has spent considerable effort in creating a comprehensive subregional plan, the Gateway Cities Strategic Transportation Plan (STP), which contains transportation projects from all GCCOG jurisdictions and analyzes relationships and impacts amongst these projects. The COG cities are currently prioritizing their projects with an eye to maximizing the mobility with project implementation. We therefore believe that the groundwork is being for subregional discretion in determining projects and project implementation.

The Gateway Cities COG looks forward to continuing the established collaboration that has allowed regional and nationally significant projects to move forward towards implementation with consensus as a project foundation.

The following attachment provides specific comments on the Draft Guidelines. If there are any questions, please call Jack Joseph, Deputy Executive Director or Karen Heit, Transportation Analyst at 562 663-6850.

Sincerely,

Al Austin, President
Gateway Cities Council of Governments

cc: Board of Directors
Gateway City Council of Governments
Comments on the
Draft Measure M Master Guidelines

• P. 4 - The Master Guideline is more of an “evolving Framework” where some guidelines are fully articulated (Local Return, Transit Operations) and others are yet to be developed. Many of the expenditure details do not currently exist. Over the next year it would be helpful for a schedule to be developed supporting the creation of the outstanding guidelines and continuing to engage all stakeholders in the development of the individual guidelines.

• P. 5 - Includes criteria that funds will be made available as projects become ready. There needs to be additional discussion/clarification as to how multi-year, partially funded projects such as the I-710 Corridor and High Desert Corridor Projects achieve a state of project readiness as these projects are acknowledged to not be fully funded in the Expenditure Plan.

• P.6 – Consideration for acceleration should also include the potential for a project to be included or to receive funding from special or one-time state or federal programs including those that relate to highways of national significance or primary freight corridors.

• Transit Contingency Subfund. It is important that a Contingency fund from net revenues assigned to each mode not result in projects first in line automatically receiving funds, to the detriment of projects slower to develop. Measure M has an ambitious revenue project which in all probability will exceed revenues; additionally, since the Subregional Equity Funds were not anticipated or accounted for in the cashflow, it may be difficult for a Contingency fund to be realized without delaying projects that may require a longer timeframe to become shovel ready.

• The SR-91/I-605/I-405 (I-605 Hot Spots) is a major transportation initiative ($590 million allocated) under Measure R and a Multi-year Subregional Program (MSP) under Measure M, with an allocation of $1 billion over 40-years.

• P. 15 – The draft guidelines appear to make sub-regional capital funds subordinate to other Metro priorities with the potential consequence that funding will be delayed or unavailable in the first two decades. There is nothing in the ordinance that supports that interpretation. Sub-regional capital funds should not be considered subordinate obligations that are
conditionally programmed funding after Metro Administration, Transit Operating & Maintenance, and Local Return / Regional Rail Sub-fund needs are met. This is a concern as the existing half-cent sales taxes (Prop. A&C, Measure R) revenues were estimated to generate $795.7 million in revenue in the adopted 2017 Budget, and Measure M is assumed to generate $860 million in 2018.

By definition, Multi-Year Sub-Regional Programs (MSPs) are neither Local Return nor Regional Projects and Programs. These commitments need to have the same priority for programming as the other primary funding categories listed in the Ordinance.

The Gateway COG is concerned that the MTA is willing to commit to issuing bonds or other borrowing for major projects (page 1 of the Expenditure Plan) but not MSP. The Guidelines offer a solution that allows for MSP projects to be self-financed by the jurisdiction after obtaining a LONP allowing a local agency to fund the project. Where does this leave an MSP such as the I-605 Hot Spots program where there are currently big ticket projects moving through environmental and other project development activities? These projects are too costly for self-financing. This is an obvious disadvantage to a large scale project that exceeds the financial capacity of most cities to finance. Local jurisdictions should not be expected to bear the burden of resolving highway issues that are more appropriate to regional, state and national agencies.

- The I-5 Corridor is a matter of national interest and not exclusively the interest of the adjacent communities that bear the burden of the congestion and that are incapable of self-financing a project of this size and scope.

There needs to be the same consideration for debt service to support the delivery of MSP programs that is given to the major projects.

- P.10 – Could the transfer between Capital and Program subfunds affect or be affected by the creation of the contingency fund?

- P. 14 - Will there be any reconciliation of yearly actual receipts within the five-year estimate of the cashflow model?

- P. 15 - MSP project sponsors – The Guidelines for the Multi-Year Subregional Program (MSP) allow lead agency project sponsors to borrow from one to fund a different MSP project sub-fund that may not be available until a later year with the consent of the Metro Board and the “affected subregion(s)”. Although the flexibility is appreciated, the Guidelines language should be changed to explicitly require consent of the “affected Council of Governments.” The Guidelines should also describe the basis & process for obtaining COG and Metro Board approval of the
request. There should be language added that ensures that Metro will not approve the loan without prior COG approval and that such approval will not be unreasonably withheld by the COG or Metro. The subregional projects listing was developed and approved through a subregional COG process.

MTA should hold the subregions accountable for complying with the ordinance. It should not establish criteria beyond those needed to ensure legal compliance with the ordinance. Under current Measure R regional programs and in the model proposed in the draft Measure M Guidelines, MTA retains the authority to unilaterally disallow or defer a project that has been included in a subregional list. The allocation of funding and eligibility criteria should be done within each subregion, not exclusively MTA, since the Subregional program is the product of early collaboration between the participating jurisdictions within the subregion. In the case of Gateway Cities, the subregion has in place the Strategic Transportation Plan (STP) that will help establish criteria for project coordination and implementation.

- P. 16 - Under what conditions would "...funds not yet be available" for the MSP? MTA should develop and maintain a 5- to 10-year MSP plan that allows cities to plan accordingly and ensures that these funds are consistently available.

- P. 18 – Subregional Equity Funds are not allocated in the Multi-year Program for the first year with the exception of the North SFV Bus Rapid Transit Improvements. All subregions should receive equal consideration and receive an allocation in 2018.

- P. 20 – Will there be an adjustment for the 3% contribution based upon the profile of the alignment contained within or adjacent to the jurisdiction? Should a city with at-grade be expected to contribute to the construction of more costly aerial or subterranean segments of the transit line? This distinction is not clear. It appears that the 3% will be calculated on the entire project and not just determined by the section within the ½ mile vicinity of the local jurisdiction.

Betterments which are defined "as a change that will improve the level of service or capacity, capability, appearance, efficiency or function over that which is required by the Metro Design Criteria and the environmental document at the time the project is advertised for construction-related bid" are excluded from the 3% local contribution. A wholesale elimination of betterments may deter private investment that can improve the safety and functioning of the station or station area. We suggest that a process be developed to integrate carefully planned betterments (or defined portions of a betterment) that provides a station or system benefit.
It is unclear whether it is the timing of the betterment (post- as opposed to pre-construction bid) or if the Ordinance intended to assign no benefit to a betterment that meets the criteria and anticipates that jurisdictions (or developers in conjunction with jurisdictions) will be willing to contribute the 3% and potentially invest in betters that serve the transit system. Either way, not crediting a betterment that meets the exacting definition seems counterproductive to creating a first class system.

The rules that govern the crediting of First/Last Mile projects to the 3% local contribution should apply to certain betterments as well, that provides direct or indirect system benefit such as: enhanced ridership, joint parking, pedestrian amenities, bicycle amenities and enhanced lighting and security,

- Within the Expenditure Plan there are 5 transit projects: the Airport Connector, Crenshaw/LAX Track Enhancement, Metro Green Line – Norwalk Extension, Sepulveda Tunnel Phase 3, and the Metro Gold Line Eastside Extension Phase 2, second alignment – that are designated “system connectivity” projects (no subregion). Appendix “A” potentially “assigns” the 3% local contribution to cities even though these projects, by definition, aren’t attributed to any particular subregion. The Ordinance dictates that any project savings from “sc” projects goes to fund other “sc” projects, if this were to include a 3% local contribution, it would be unfair to the contributing jurisdiction. Projects that are determined to “sc” should be exempt from the 3% local contribution particularly when the construction of these projects is deemed to benefit the entire County.

- P. 21 – The criteria for local first/last mile investment contributions should be developed in a collaborative manner by MTA in conjunction with the COGs and LA County cities that will bear the responsibility for implementing these improvements. There should be an ability to negotiate, on a case by case basis, an additional transportation project investment after the conclusion of the 30% PE. Flexibility to work with private developers interested in improving station access/safety/security should not be arbitrarily rejected after PE.

- P. 21 – Opt Out Option – The language for the opt-out provision requires more specificity as to what may be negotiated or what the parameters are for failing to reach “a timely agreement”

- P. 22 – MSP funds by definition are limited to capital projects. This is followed by criteria that describe project readiness and specify those activities that define construction readiness. These descriptions include pre-construction items that might be considered project planning and development. More discussion needs to occur to help define this phase.
and ways to assist disadvantaged communities through this process. Smaller jurisdictions may have difficulty advancing projects for competition under the existing MSP project readiness standards.

- P. 25 - The Multi-Year Highway Subfund Guidelines include the following statement, "It is expected that local jurisdictions will contribute to total project costs." There is no such requirement in the Measure M Ordinance. Subregional projects should not require a project sponsor match. Acceptable language would be to encourage jurisdictions to leverage Measure M funding. Projects that leverage other funding (MTA, non-MTA) might be given higher consideration for funding.

- P. 31 – All interchange projects where the PSR/PDS/PAEDs are funded through Measure M must consider Expresslane alternatives according to the Guidelines. What happens if an Expresslane is found to be feasible and desirable but costly (right-of-way acquisition). How, or will, it be advanced or funded to construction?

- P.41, P. 75 – The definition of Active Transportation should be expanded beyond "non-motorized, human-powered mode of transportation..." described in the Local Return section. This specificity excludes other current and future "slow speed" modes and the facilities to improve the safety of their use in public rights-of-way. Examples of excluded modes include e-bikes, slow speed scooters, e-skateboards, etc. – and all of the other innovative modes that may be introduced through future public or private sector programs. Considering the aging demographics in LA County, the regional, sub-regional and local return guidelines should be broadened and consistent to include eligibility for all electric-power assisted slow speed modes and the facilities that improve the safety of these modes.

- P. 43 - 2% System Connectivity Projects (Highway) states that; "The Measure M Expenditure Plan already includes the I-710 South Phase 1 and 2 and the I-105 Expresslane Projects which are to be funded with the Highway 2% System Connectivity Program." Of the two projects, only the I-105 Expresslane project is actually designated as a "sc" project. Is the intention to make the I-710 phases compete with other projects for the 2% System Connectivity Projects, or is the I-710 a "major project" assigned to the Gateway Cities Subregion that accrues revenue over time and as project component pieces are ready? Or is the I-710 project eligible for both? Will the I-105 Expresslane Project and the I-710 compete for funding?

- P. 48 – Visionary Project Seed Funding – this is a laudable expenditure of funds and also verification that Measure M funds can be used for more than capital expenditures. The applicant pool should be expanded to
include cities, COGs and groups of cities as well as organizations that chose to partner with a government entity to develop or present a visionary project. The match may be difficult for some of the eligible applicants to meet, even major universities or colleges. Suggest that the match be reduced to 20% and allow for in-kind contributions including staff.

- P. 52 – The language for the Subregional Equity Funds is tenuous on the availability of these funds. In order for Measure M to be equitable to all subregions, the cashflow should mirror the availability accorded the San Fernando Valley. The five-year allocation increment is workable, however, the “if any” should be removed as there should be an established cashflow for subregional projects even if debt service is required. Additionally the Draft Guidelines regarding Subregional Equity Funds should not allow MTA to meet its obligations using “any combination of federal, state or MTA controlled funds including, but not limited to, Measure M.” This flexibility being sought by MTA potentially places significant grant compliance requirements on smaller cities, subregions, and lead agencies that were not specified in the Measure M Ordinance. Exclusively allocating Measure M sales tax to other agencies would be consistent with a long held MTA practice of retaining more difficult to handle state and federal funds for large infrastructure projects where tracking and procurement systems are already in place.

Before any Subregional Equity Program funding is allocated, MTA should work with each subregion to identify which projects and programs are priorities for this funding. Gateway Cities is currently in the process of having each jurisdiction prioritize modal projects within their city. The $244 million will be a good source for meeting project goals in a manner that produces subregional mobility benefit. The Gateway COG may choose to program a portion of these funds to the otherwise unfunded active transportation MSP.

There is a disconnect between funding projects on a “First come, first serve – project readiness” criteria and mobility benefit. How will funds distributed in this manner contribute to Measure M program objectives let alone meet any sort of mobility goal? What is the incentive for smaller jurisdictions to band together to create a larger, more impactful project when this may take longer than a smaller, uncoordinated, singular effort?

- P. 55 – Regional Rail, the only area where specific program standards are required for the support of the additional 1% regional rail funding allocation. The guidelines do not recognize the multi-county nature of SCRRRA but impose specific performance measures that presumably the agency must comply with in order to receive the funding. The performance
Chair Fasana,

On behalf of the Westside Cities Council of Government (WSCCOG) Board, please find attached our comment letter to the Measure M Draft Guidelines. We look forward to continue to engage with Metro staff and other key stakeholders in delivering on the promise of Measure M. Please contact our Executive Director Cecilia V. Estolano with any questions regarding this letter.

Winnie
WSCCOG Project Director

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May 25, 2017

Honorable John Fasana  
Chair, Board of Directors  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012

RE: Comments on Draft Measure M Guidelines

Dear Chair Fasana,

Thank you for the opportunity to work with Metro staff in developing the Measure M Guidelines. The Westside Cities Council of Governments (WSCCOG) offers the following comments on and recommendations for changes to the Measure M Guidelines based on consultation with stakeholders, discussions among City staff and our participation in Metro's Policy Advisory Council process.

1. Local Return

A. Include Employment Data in the Allocation Methodology

The WSCCOG strongly urges using employment data to calculate daytime population in allocating Local Return Funds. The Westside currently hosts the highest population and employment densities in the region and is projected to experience the region's highest employment growth in the coming decades. Further, Metro's Westside/Central Service Sector consistently boasts the highest levels of ridership for both bus and rail. The Westside's transportation infrastructure, including roadways, local streets, and transit services, all absorb significant wear and tear to accommodate the region's economic activity. Crafting a methodology that includes consideration of daytime population by using employment data will enhance opportunities for job creation, access, and retention for our entire County. The availability of Employment Development Department data that is updated every two to three years ensures that the calculations will be sufficiently current for Metro's use.

B. Expand Definition of Public Transit Service

The Guidelines contain an Eligible Uses list for Local Return Funds under the Public Transit Services category (p. 77) that includes "subsidized taxi services for residents" and "taxi coupon programs." Additional text should be added to clarify that "similar point to point services" are also Eligible Uses.

C. Do not include the local return "floor"

The WSCCOG does not support a local return "floor" that would transfer funding from jurisdictions with greater populations and transportation needs to smaller jurisdictions with lower population.
2. 3% Local Contribution to Major Transit Projects

A. Expand Eligibility for Local Contribution

The Guidelines (p. 20) define a “betterment” as a change “that will improve the level of service and/or capacity of, capability, appearance, efficiency or function over that which is required by the Metro Design Criteria.” The Guidelines then exclude local funding of a “betterment” for credit against the 3% local contribution. The definition of “betterment” is overly broad. The Guidelines should be amended to clarify that a capital investment that supports access to or enhances and improves the level of service, capacity, operation, or efficiency of a future rail station is eligible for credit towards the 3% local contribution.

In addition, any funds that a City spends on any first/last mile and active transportation projects (including those outside of the Metro “betterment” process) that would improve or support access to a light rail station (or a future light rail station) should be considered as part of the City’s 3% contribution. For example, Transit Oriented Communities (TOC) development adjacent to the stations could provide direct or indirect system benefit such as enhanced ridership, joint-use parking, pedestrian and bicycle amenities or enhanced lighting and security, and such investments should be included toward the 3% contribution.

Furthermore, additional language should be added to the Guidelines to clarify that major transit capital projects that require the 3% local contribution are for rail projects only. Currently, this specific reference to rail is only included in the “Program Methodology”, stating that the calculation of the contribution is based on “dividing 3% of the projects total cost...by the number of new rail stations constructed on the line.”

B. Later Term Projects Should Include an Economic Benefits Analysis

Appendix A of the Guidelines lists jurisdictions that may have to contribute 3% towards Major Transit Projects. Culver City is listed twice under the Westwood to LAX segment of the Sepulveda Pass Corridor and has been assured by Metro that the alignment of this project is still in the earliest stages of planning. For projects, such as Phase 3 of the Sepulveda Pass, where station locations are still quite speculative, but potential costs are very high, the Guidelines should include a provision for an Economic Benefit Analysis to be conducted in conjunction with the analysis of environmental impacts to provide an assessment of the economic benefits that may accrue to the jurisdiction in which stations are proposed. This will be important for cities to evaluate whether to opt-out of the 3% contribution. Further, flexibility should be given to local jurisdictions (that will be subject to the 3% contribution) to negotiate with Metro on the amount, funding source, and timeline of contribution.
3. Multi-Year Subregional Programs (MSP)

The structure and operation of the MSP is an area of the Guidelines requiring further work between stakeholders and Metro staff. We support taking additional time beyond July 1 to work through these issues before Metro adopts guidelines in this area. We highlight the following topics for further discussion.

A. Eligible Use of Funds Should Include Planning and Coordination Through Different Stages of Project Development and Construction

As currently drafted (p. 22), the Guidelines limit funds to capital projects and employ a readiness scheme that does not appear to include essential pre-construction and project development elements that are crucial for carrying out the subregional programs. Subregions (COGs and their member cities) should be able to use Measure M funding for planning, programming and outreach related to the coordination and refinement of subregional project lists, planning and coordination of projects, and applying for federal, state and regional funds that can accelerate project delivery. These activities constitute pre-construction planning that enables projects to complement each other and maximize mobility and GHG reductions. In addition, the Guidelines should clarify that Transportation Demand Management programs and strategies are eligible for funding to capitalize on innovative mobility strategies and technology applications that can cost-effectively enhance mobility and encourage changes in mode choice. For example, with Subregional program discretion, eligible projects may include advanced transportation approaches or acquisition of contracted transportation services that are required for service delivery associated with capital acquisition identified in the Mobility Matrix. This would capitalize the direct cost of the transportation services directly needed to implement the capital projects, (e.g. service hours and fuel).

B. Include a Process to Update and Revise Mobility Matrices

While the Mobility Matrix process was useful in compiling a list of projects within each subregion, it should not be considered the permanent and definitive list of projects eligible for Measure M funding at a subregional level. Rather than elevating the Mobility Matrix to this level (p. 23), the Guidelines should clarify that subregions can revise, add and coordinate projects to respond to changing needs and priorities, innovation and technological advancements. This process of coordination and updating should include stakeholder engagement and be driven by the goals and objectives that members of each subregion develop as part of its Multi-Year Subregional Programs. The authority to determine what projects are permitted to be included and/or funded should rest on the subregions.

C. Provide Option and Funding for Jurisdictions/Cities to Coordinate, Plan and Manage Subregional Programs through their COGs

Over the next several months, Metro staff, jurisdictions and stakeholders should work through the process of how the MSP will be administered, taking into
account the wide variation in subregional entities and MSPs. Ultimately, the Guidelines should provide member cities/jurisdictions with an option to administer their respective MSPs through their subregional entity under a memorandum of understanding with Metro that sets forth administrative requirements and standards. Under this option, the cities/jurisdictions could direct their COGs to work in conjunction with Metro to develop the objectives, funding criteria, performance measurements, project readiness standards, and stakeholder and public engagement plan for the MSP. These activities should be eligible for Measure M funding as they are essential elements for effective and timely project development/delivery.

4. First/Last Mile Active Transportation Program for the Westside

A. Clarify Funding Source for I-10/Robertson Improvements

During the development of the expenditure plan, the I-10/Robertson Interchange Improvements project was categorized under the Westside’s Multi-Year Subregional Program. While some of the improvements contemplated will improve pedestrian and bicyclist safety and access in the area, many of the improvements would not qualify under the draft Guidelines for the Westside First/Last Mile Active Transportation Program MSP. A footnote or separate category should be created in the MSP to account for the I-10/Robertson Improvements, which have long been a Westside priority and are currently in the planning and design phase.

B. Add Transit Service to First/Last Mile Eligible Projects

Transit Service should be added to the examples of Eligible Projects listed on page 37 of the Guidelines under the First/Last Mile section.

5. Subregional Equity Program

A. Funds Should Be Made Available to All Subregions Simultaneously

Once Subregional Equity Program funds are made available to the San Fernando Valley subregion under this program, a proportional allocation should be made to all other subregions at the same time to ensure actual funding equity. We believe this action is consistent with the narrative contained your August 2016 letter addressed to Los Angeles County local jurisdictions, entitled “Notice of Technical Correction to the Los Angeles County Traffic Improvement Plan.”

B. Subregions Should Develop Funding Criteria

According to the Notice of Technical Correction to the Los Angeles County Traffic Improvement Plan, additional funds were allocated to a project that would “increase system connectivity in the North San Fernando Valley and the Metro Transit System”. Cities/jurisdictions should be responsible for working within their respective subregions to develop the eligibility criteria for the additional funding allocated through the Subregional Equity Program. No additional project
readiness or local contribution requirements should be attached to the Subregional Equity Program.

C. Add Alternative Transportation Projects to First/Last Mile Eligible Projects

All alternative transportation projects should be eligible for funding under WSCCOG's MSP.

6. Countywide BRT Expansion Should Not Exclude Municipal Operators

The draft Guidelines limits the Bus Rapid Transit expansion funds to Metro only (p. 50). Some of the corridors being studied include areas served by municipal operators such as Santa Monica Big Blue Bus and Culver CityBus. The Guidelines should not constrain the use of these funds and should allow for municipal operators to potentially participate in the program.

7. Change in the subregional boundaries should require concurrence from the subregions

The Guidelines allow the Metro Board to change the sub-regional boundaries starting in 2047. The Guidelines should require concurrence from the sub-regions rather than as a unilateral Metro action.

The Westside Cities Council of Governments looks forward to continuing to engage with Metro staff and other key stakeholders in delivering on the promise of Measure M. Please contact our Executive Director, Cecilia Estolano, with any questions regarding this letter. This is an exciting time for transportation and mobility in our region and the Westside welcomes the opportunity to contribute to this important work.

Sincerely,

Kevin McKeown
Chair
Westside Cities Council of Governments

CC: Metro Board of Directors
Phil Washington, CEO, Metro
Honorable Board Members of Westside Cities Council of Governments
The Las Virgenes-Malibu Council of Governments (LVMCOG) has reviewed the Draft Measure M Guidelines and provides the following comments and recommended changes:

Recommendation No. 1:

The LVMCOG recommends Metro use (resident) population for calculating Local Return funding and does not support a minimum allocation.

Local Return is defined in the Final Measure M Ordinance as “funds returned to the cities within Los Angeles and Los Angeles County, based on population, for eligible transportation-related uses as defined by the Local Return Guidelines to be developed in coordination with such cities and Los Angeles County and adopted by the Metro Board of Directors.” The dictionary defines population as “the total number of persons inhabiting a country, state or city.” The LVMCOG is opposed to Metro deviating from the Final Measure M Ordinance in order to provide minimum allocations of Local Return funds.

Recommendation No. 2:

The LVMCOG recommends that where a Subregion is represented by a COG, the COG should be responsible for prioritizing and programing projects in the Subregional.

Throughout the draft Measure M Guidelines, Metro refers to the term “Project Sponsor” when discussing the programming and use of Subregional Funds. This term is not defined in the Final Measure M Ordinance. The LVMCOG feels strongly that Subregional projects should be prioritized by the respective COGs. This would be similar to the current process used by Metro and the LVMCOG for the successful Measure R Las Virgenes-Malibu Highway Program (LVMHP). We believe this model allows better efficiency and subregional customization than what is currently proposed in the Draft Measure M Guidelines.

Recommendation No. 3:

The LVMCOG recommends Metro be required to adhere to COG-adopted Subregional program and project lists when executing funding MOUs for specific projects listed. Subregional Capital Funds

Measure M Guidelines should include a provision requiring Project Sponsors to have the concurrence of the sub-region (essentially, the COG’s representing the Subregions) prior to being included by Metro in their annual funding plan even if already included in the various adopted Mobility Matrices. To provide this concurrence, each COG should be required to adopt a five-year programming plan for each Subregional program within their respective Subregion. The five-year programming plan would have to identify specific projects and phasing, allocated funding amounts, and project timing and be submitted to Metro. These programming plans would be required to be updated or amended on an annual basis reflecting executed funding MOU’s and project additions or deletions. Should a project included in a COG adopted Subregional programming plan be denied by Metro, the COG shall have the right to appeal the denial to the Measure M Oversight Board.
Recommendation No. 4:

The LVMCOG recommends that this term “pre-construction” be expanded to “planning and programming studies.”

The guidelines state that Measure M funds may be used for pre-construction as well as construction activities. Pre-construction activities are defined in the guideline and include “planning studies.” Adding the term “programming studies” will allow the Subregions through their respective COGs to develop Subregional project lists, and for subsequent project development and delivery. This will ensure that proposed projects complement each other and improve congestion and safety.

Recommendation No. 5:

The LVMCOG recommends that the Draft Measure M Guidelines should be revised to not allow Metro the ability to unilaterally determine that a Subregion’s funding requirement under the “Subregional Equity Fund” be met with something other than Measure M funds. In addition, each COG should have equal access to these funds.

The Measure M Guidelines regarding Subregional Equity funds state that Metro may meet these obligations using “any combination of federal, state or Metro controlled funds including, but not limited to, Measure M.” LVMCOG appreciates the need for this flexibility; however, this flexibility being sought by Metro potentially places significant grant compliance requirements on Subregions that may conflict with proposed projects or uses of those funds. Such a funding substitution should only be allowed with the affected COG (Subregion’s) concurrence.

Recommendation No. 6:

The LVMCOG recommends that Draft Measure M Guidelines be revised to state that Subregional capital funds shall not be subordinate to other Metro programmed funding.

The LVMCOG is listed in the Measure M Expenditure Plan (Attachment A) and is allocated funding beginning in 2018. All of the COGs need assurance that Metro will allow projects to have the funding, as listed, to proceed from development to construction.

Recommendation No. 7:

The definition for eligible uses for the “Highway Demand Based Program” should include park and ride facilities, as well as other ridesharing related facilities.

Recommendation No. 8:

The term “shovel ready” appears in the Draft Measure M Guidelines. There is no definition for the term in the Guidelines. The LVMCOG recommends that it be defined to include planning and pre-construction activities as it is likely a project will require Measure M funds through the phases leading up to construction.

Recommendation No. 9:

The Draft Measure M Guidelines allow the Metro Board to change the Subregional boundaries starting in 2047. Concurrence from the sub-regions should be required before any boundaries are changed.
Recommendation No. 10:

The Draft Measure M Guidelines should add COGs to the recipients currently listed to receive any Notices of Public Hearing related to changes to or amendment of the Measure M Guidelines.

Please contact Terry Dipple, Executive Director, Las Virgenes-Malibu COG tdipple@msn.com 818-968-9088 if you have any questions about the comments.
Dear Metro:

Following an opportunity to review the Measure M Guidelines, the Local Transit Systems Subcommittee discussed and motioned to recommend the attached comments and recommendations.

Please contact me by email or phone (626-744-7661) if you have any questions.

Local Transit System Subcommittee
Sebastián Hernández - Chair
Justine Garcia – Vice Chair
Luz Echavarria - Secretary

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From: Hernandez, Sebastian
Sent: Tuesday, May 02, 2017 11:37 AM
To: Richan, Susan; 'Amy Ho (Monterey Park)'; 'Ann Meiners (LA County DPW)'; 'Anne Perkins-Yin (Covina)'; 'Art Cueto (consultant Huntington Park)'; 'Ben Flores (Oldtimers Foundation)'; 'Bertha Tafoya (El Monte)'; 'Beverly Wong (Burbank)'; 'Biran O'Connor'; 'Cammie T. Le'; 'D Doukas'; 'Dave Rendon (Duarte)'; 'David Giugni (West Hollywood)'; 'David Lopez (Baldwin Park)'; 'Engel, Kathryn (Glendale)'; 'Eric Haack (ASILA)'; 'Eric Rosales (Downey)'; 'Erwin Estrada (Jewish Family Service)'; 'Eve Kelso (Manhattan Beach)'; 'Gary Hoggatt'; 'George Sparks (Pomona Valley PRTA)'; 'Grace Cruz'; 'Gwynn Stevens (El Monte)'; 'Jane Leonard (Culver City)'; 'Joe Barrios (Santa Fe Springs)'; 'John Huang (LA County DPW)'; 'Joyce Rooney (Redondo Beach)'; 'Justine Garcia (JGarcia@ci.glendora.ca.us)'; 'Luchie Magante (Carson)'; 'Luis Pacheco (ASILA)'; 'Luz Echavarria (LA City)'; 'Martha D'Andrea (LADOT)'; 'Martin Browne (Whittier)'; 'Martin Gomberg (Consultant)'; 'Matthew Avancena (ASILA)'; 'Perri Sloan Goodman (West Hollywood)'; 'Raymond Chavez (Pico Rivera)'; 'Rick Lovely'; 'Scott Smilowitz (West Covina)'; 'Sergio Gonzalez (South Pasadena)'; 'Silva Baghdanian (Glendale)'; 'Silvia Llamas (Rosemead)'; 'Tomas Uwal (Inglewood)'
Subject: RE: LTSS Measure M Feedback - Email Motion

Update

Motion approved, please find the list of 12 email votes with no rejection votes:

Approve - Luz Echavarria - LADOT
Approve – Sebastián Hernández - Pasadena
Approve - Kathryn Engel - Glendale
Approve - Perri Sloan Goodman – West Hollywood
Approve - Justin Garcia – Glendora
Approve - Ann Meiners - LA County
Approve - Thomas Uwal - Inglewood
Approve - Martin Browne - Whittier
Approve - George Sparks - Pomona Valley Transportation Authority
Approve - Martin Gombert - Palos Verdes Peninsula Transit Authority
Approve - Gwen Stevens - El Monte
Approve - Joe Barrios - Santa Fe Springs

Thank you all for your participation. Next stop TAC.

Sebastián Andrés
(626) 744-7661
Local Transit Systems Subcommittee (LTSS) Measure M Guidelines Recommendations

- Comment 1 – Page 20 - 3% Local Contribution to Major Transit Projects

Under the section “3% Local Contribution to Major Transit Projects,” LTSS suggests that additional language be added to clarify that major transit capital projects that require the 3% local contribution are for rail projects only. Currently this specific reference to rail is only included in the Program Methodology of this section. In the “Program Methodology” of this section, it states the calculation of the contribution is based on “dividing 3% of the projects total cost...by the number of new rail stations constructed on the line.”

- Comment 2 - Page 22 – Multi-year Subregional Programs, Introduction paragraph

Reword first sentence to clarify that the list of Subregional programs/projects are identified in an Expenditure Plan that is an attachment to the actual Measure M Ordinance and not found as part of these guidelines.

It is not clear if new Subregional programs may be added in the future (and if so, how) or if the projects are restricted to those in the “Expenditure Plan”.

- Comment 3 – Page 22 - Multi-Year Subregional Programs

Under the Multi-Year Subregional Programs (MSP), the last sentence in the introduction states, “all of the MSP funds are limited to capital projects.” LTSS recommends that with Subregional program discretion, eligible projects, per the term “capital projects” in the Multi-Year Subregional Program, also include acquisition of contracted transportation services that are required for the service delivery associated with the capital acquisition identified in the Mobility Matrix. This would thereby capitalize the direct cost of the transportation services directly needed to implement the capital projects, (e.g., revenue service hours and fuel), and would not include any administrative costs. This approach is similar to that which is identified in the Federal Transit Administration (FTA) 5310 Traditional Capital Grant Program for enhanced mobility of senior and individuals with disabilities which has as eligible capital expenses the acquisition of contracted public transportation services (49 U.S.C. 5310(b)(4)). As documented in the Subregional Mobility Matrix, the cost to support expanded transit services was included, but the guidelines need to explicitly allow the acquisition of these transportation services that are required for the implementation of the capital projects identified in the Mobility Matrix.

- Comment 4 - Page 24 – Measure M Recognition (see also page 40)

Acknowledgement of Measure M funds should be simple and straight forward and not get bogged down in process. Swap the language so that the acknowledgement is determined by the recipient agency in consultation with Metro.

Metro should provide agencies with Measure M logos in different formats.
Comment 5 – Page 37 - Active Transportation, First/Last Mile Definition (FLM)

Active Transportation, First/Last Mile Definition (FLM). This definition does not include any language related to the use of transit services as an option to start or complete the First/Last Mile (page 37). LTSS recommends revising this definition to include transit services as follows:

"Infrastructure, systems and modes of travel used by transit riders to start or end their transit trips, including but not limited to regional or local shuttle circulator services. This includes but is not limited to infrastructure for regional and/or local shuttle circulator services, walking, rolling, and biking (e.g., bike lanes, bike parking, sidewalks, and crosswalks), shared use services (e.g., bike share and car share), facilities for making modal connections (e.g., kiss and ride and bus/rail interface), signage and way-finding, and information and technology that eases travel (e.g., information kiosks and mobile apps).

Comment 6 - Page 61 – 20% Transit Operations, Title & Introduction

Please use the proper title “Included and Eligible Municipal Operators” Or “Regional Operators” instead of Municipal Providers. There are another 25 municipal providers that are ineligible for these funds.

Comment 7 – Page 65 - 2% ADA Paratransit for the Disabled; Metro Discounts

Given the significant future demand for ADA paratransit, the Measure M guidelines should be clear that at least 75 percent of the 2% ADA Paratransit/METRO Discounts pot should be dedicated to support ADA paratransit in Los Angeles County. Under "Allocation Methodology," LTSS recommends that the split is 75/25 between these two uses by editing this statement in the following manner:

The program funds will be allocated annually based on budgetary needs, with ADA as a priority, for a maximum of 75% for ADA paratransit, and a minimum of 25% for Metro discounts for seniors and students. Any unused funds will revert back to the pool of funds to be redistributed in the following fiscal year.

Comment 8 – Page 70 – Local Return

Under local return, Metro is currently recommending the $100,000 annual minimum allocation for small population cities that normally receive less than this amount. LTSS does not object to this proposal, however is not in favor of increasing this amount beyond the current recommended $100,000 minimum.

Comment 9 – Page 77 - Local Return Program

Local Return Program (Public Transit) - LTSS recommends to add Transportation Network Companies as an alternative to taxis – LTSS recommends revising the Public Transit
expenditures (page 77) as follows, “Fare subsidy, subsidized taxi or similar service for residents” and “Taxi or similar service coupon programs used to provide paratransit systems for senior and disabled patrons.

- Comment 10 - Page 98 - Appendix B: Attachment A – Title

Listing on Table of Contents does not make sense, and neither does it make sense at the document title. Change to “Low Income Fare Subsidy Program”

Should the Expenditure Plan be included as an appendix for easy reference?

- Comment 11 - General Comments

It is not clear if the Mobility Matrixes that were used in the development of the Ordinance are in stone or if the subregion(s) can create new matrixes or add to matrixes.

Throughout document, there are references to the Mobility matrix and Expenditure plan that seems to have them interchangeable. This is not clear.

There are many references to Attachments throughout the document. The attachments should be referenced by name. I.e. Attachment A: Expenditure plan versus Attachment A: Low Income Fare Subsidy Program

- Comment 12 - General Comments

Measure M does not sunset, therefore, LTSS recommends a regularly scheduled review and update of the Measure M Guidelines be conducted at a minimum every five years.
Thompson, Keira

From: Guerrero, Rene <Rene_Guerrero@ci.pomona.ca.us>
Sent: Monday, May 01, 2017 11:46 AM
To: THEPLAN
Subject: I have Draft Measure M Guidelines comments.

To Whom It May Concern:

Regarding the Local Return allocation, it is the City's preference that Measure M be implemented as was voted by the people of Los Angeles County (i.e. no consideration for a minimum allocation to smaller cities). Additionally, should a minimum allocation amount be approved, it should be no greater than $100,000.

Thank you,

Rene Guerrero, P.E. | City Engineer | Public Works Dept. | City of Pomona | Office (909) 620-2440 | rene_guerrero@ci.pomona.ca.us


www.ci.pomona.ca.us
Dear Chair Fasana and Metro Board Members:

On behalf of the City of Culver City, please find attached our comment letter to the Measure M Draft Guidelines. The City of Culver City looks forward to participating in future Measure M planning efforts. If you have any questions, please contact me.

Thank you

Shelly

Shelly Wolfberg | Assistant to the City Manager – City of Culver City
9770 Culver Boulevard | Culver City, CA 90232 | shelly.wolfberg@culvercity.org | 310-253-6008
May 25, 2017

The Honorable John Fasana, Chair and
Members of the Metro Board
Metro
One Gateway Plaza
Los Angeles, CA 90012-2952
theplan@metro.net

Subject: City of Culver City’s Comments to the Measure M Draft Guidelines

Dear Chair Fasana and Board Members:

The City Council of the City of Culver City appreciates this opportunity to comment on the Measure M Draft Guidelines. Culver City shares Metro’s objective to implement Measure M projects in a cost effective and timely manner, however Culver City wants to recommend changes that the City feels will be critical to make the guidelines work better for local partners, particularly smaller cities in Metro’s service area.

We respectfully request that the Guidelines be updated to include the following priorities:

1. 3% Local Contribution for Major Transit Capital Projects

   - For projects like Phase 2 and 3 of the Sepulveda Pass, where station locations are still quite speculative, and the environmental review process has not yet been done, flexibility should be given to local jurisdictions (that will be subject to the 3% local contribution) to negotiate with Metro on the amount of contribution and types of contribution. This is especially important in cases where a jurisdiction may be required to pay towards more than one station, and the flexibility to negotiate and determine a reasonable way for jurisdictions to contribute toward these rail projects is needed. Jurisdictions should not be penalized (by having up to 15 years of their Measure M local return funding withheld), when they have no control over these rail projects, their costs, and the station locations.

   - The guidelines allow for the inclusion of the first/last mile improvements as part of the 3% contribution. However, there should be greater flexibility on what first/last mile improvements can qualify, as Metro rail projects may only contain very basic first/last mile improvements in their base projects, and some first/last mile improvements that the City wants to do may be deemed as betterments. Local
jurisdictions should be able to claim all first/last mile improvements as part of their 3% contribution.

2. Definition of Population for the Local Return Allocation

- Culver City supports the inclusion of the daytime population and employment population in the definition of population for local return allocation. This inclusion of the daytime population and employment population, along with the residential population, would more properly reflect the use of the transportation infrastructure and will more equitably distribute funding based on the use of the infrastructure.

3. The Westside Cities Council of Governments (WSCCOG) Multi-Year Subregional Program (First/Last Mile Program)

- The guidelines state that the projects in the Mobility Matrix are eligible for funding under this program. However, the subregions should be allowed to add projects to the Mobility Matrix to accommodate for future projects. Under this program, the authority to determine what projects are permitted to be included and/or funded should rest on the subregions.

- The guidelines should also allow for all phases of the project, including planning/project development, to be funded using Measure M funds.

- The guidelines limit this category of funding to capital projects only. Transportation Demand Management programs/strategies should be eligible to be funded under this program. This would allow for innovative mobility strategies and technology applications that are integral to the enhancement of mobility and to encourage/incentivize change in modal choices.

- The I-10/Robertson Multimodal Circulation Improvement Project is under the WSCCOG Multi-Year Subregional Program, and a footnote should be added under the Expenditure Plan and/or the Measure M guidelines, so that this project is not bound to only improvements defined in the guidelines under the First/Last Mile Program for the Westside.

- There is no clear, defined process describing how the projects will get selected and funded under this program. Metro needs to provide guidance and support on setting up the process for each subregion.
4. Subregional Equity Fund

- The subregional Equity Funds should be made available to all the subregions, when the funding for the San Fernando Valley sub-regional equity project becomes available.

- Projects under this category should be developed by the subregions (COGs). The guidelines should not impose any special project readiness or local contribution requirements for these funds.

5. Other Issues

- The Guidelines allow the Metro Board to change the sub-regional boundaries starting in 2047. The Guidelines should require concurrence from the sub-regions rather than as a unilateral Metro action.

Thank you again for the opportunity to weigh in on the Measure M Draft Guidelines. Culver City supports incorporating these comments into the Draft Guidelines, which would ensure that they are more reasonable and facilitate the successful implementation of the projects funded through Measure M. If you have any questions, or if you wish to discuss this further, please contact me at (310) 344-8033 or via email at jeffrey.cooper@culvercity.org.

Sincerely,

Jeffrey Cooper
Mayor

cc: The Honorable Members of the City Council
John M. Nachbar, City Manager
Phillip A. Washington, Metro Chief Executive Officer
please revise the following section on page 72 to read as follows:

Streets and Roads improvements may consist of, but are not limited to, the following:

- Repair and maintenance of public roadways, pavement maintenance, slurry and rubberized seals, chip seals, pot-hole repair, pavement rehabilitation, or other pavement preservation treatments, roadway construction or reconstruction, utility undergrounding, curb, gutter, sidewalk, trees, roadway signage, median, parkway improvements, and storm drain systems in connection with any roadway improvements.

Thanks

Mohammad Mostahkami, P.E.
Director of Public Works

City of Downey

Phone: 562.904.7102
Fax: 562.904.7296
mmmostahkami@downeyca.org
The City of Signal Hill appreciates the opportunity to comment on the Measure M Draft Guidelines as well as Metro’s willingness to consider a minimum local return funding level. The City supports a practical minimum funding level that enables cities to perform meaningful projects. The current $100,000 per year proposal is too low and reduces the amount of local return received by cities with small populations. Signal Hill requests consideration of a $500,000 minimum funding level for small cities that can demonstrate: 1) they have roads classified as truck routes and bus routes; and 2) they can demonstrate that Measure M revenues collected from the city exceeds the amount it receives in local return.

The City of Signal Hill has consistently expressed concern about the use of the per-capita funding formula because a city’s population alone does not reflect the wear and tear placed on local roads by goods movement, transit, and regional traffic. Signal Hill is located in the center of Long Beach, the 2nd largest city in LA County and the 7th largest city in the state. Due to our proximity to the Ports of Long Beach and Los Angeles, the Long Beach Airport, and I-405 freeway, Signal Hill roads are impacted by trucks, buses, and commuter traffic. All of Signal Hill’s major roads are officially designated as truck routes and all but one serve as a public transit route. However, Signal Hill is estimated to receive only $155,000 in Measure M local return because of our small population.

Signal Hill asks Metro to consider that Measure M revenues are generated in cities that produce taxable sales. The roads in cities, such as in Signal Hill, are impacted by the trucks delivering taxable goods. Approximately $15 million will be collected in Measure M and Measure R transportation taxes from sales in Signal Hill. However, Signal Hill’s combined annual share of local return from these programs is only $287,000. The estimated cost to repave a major arterial road is $1 million per mile and costs are increasing. Therefore, the City of Signal Hill is proposing the following practical minimum local return funding level that enables cities to perform meaningful projects:

A. Minimum funding level of $500,000 for cities that can demonstrate that its major arterial roads are designated as truck routes and bus routes; and

B. The amount of Measure M revenue collected from sales generated within the city exceeds the amount the city receives in local return.

C. Cities that do not meet the criteria in A and B above receive funding based on the per-capita formula.

The City of Signal Hill appreciates Metro’s consideration of our Measure M Local Return minimum funding proposal. I also want to thank Metro for hosting the Metro Mayors Roundtable and providing an opportunity to participate on the Local Return Working Group.

Sincerely,

Edward H.J. Wilson
Mayor
I support Mayor Robert Garcia's plan for a base or minimal funding formula for smaller cities, not just a funding formula based on population.

Lori Y. Woods
City of Signal Hill
562.477.1287

---

From: Metro Policy Advisory Council Staff [MetroPAC@metro.net]
Sent: Wednesday, May 17, 2017 5:32 PM
To: Lori Woods
Subject: REMINDER: Measure M Draft Guidelines Comments due May 26

Dear Metro Partner,
Comments on the Measure M Draft
Guidelines [https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Ft.e2ma.net%2Fclick%2F0ggbo%2F4rzo10%2F4f2qbf&data=01%7C01%7CMetroPAC%40metro.net%7C334ec74fa0aa4db1fc4bb08d49e0959ce%7Cab57129bd8f4caca77fc74c0364af%7C0&sdata=XNCM%2BmZWNy1wEulEb9caW1xu9%2BYS5DqZMNaD8rXu%3D&reserved=0] are due by May 26, 2017. We strongly encourage you to submit your comments to theplan@metro.net<mailto:theplan@metro.net>. If you have any questions, you may respond to this email or contact Vivian Rescalvo at 213.922.2563 or rescalvo@metro.net<mailto:rescalvo@metro.net>.

Thank you for your interest.

You have subscribed to receive Metro information, edit your preferences [https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Ft.e2ma.net%2Fapp2%2Faudience%2Fsignup%2F1839306%2F1790866%2F1618156434%2F&data=01%7C01%7CMetroPAC%40metro.net%7C334ec74fa0a4db1fc4bb08d49e0959ce%7Cab57129bd8f4caca77fc74c0364af%7C0&sdata=pwq1IHDsZRxwYQteelJ3%2Bv8No3b86U22F12TMKF8w%3D&reserved=0] or unsubscribe [https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Ft.e2ma.net%2Foptout%2F0ggbo%2F4rz010%3Fr%3DaHR0cHM6Ly9hcHAuZTJtYS5uZXQvYXBwbmlkYXRlLmNvdXNzLmNsb3Nl%2FNe4MTU2NDM0Lw&data=01%7C01%7CMetroPAC%40metro.net%7C334ec74fa0aa4db1fc4bb08d49e0959ce%7Cab57129bd8f4caca77fc74c0364af%7C0&sdata=mYl5FCm5USvSK7DPwagazoZ5L%2B7qDAsfhPo7I5w%3D&reserved=0] >.
May 9, 2017

Los Angeles County Metropolitan Transportation Authority

Submitted via theplan@metro.net

Subject: Comments on the Measure M Draft Guidelines

The City of Signal Hill appreciates the opportunity to comment on the Measure M Draft Guidelines as well as Metro's willingness to consider a minimum local return funding level. The City supports a practical minimum funding level that enables cities to perform meaningful projects. The current $100,000 per year proposal is too low and reduces the amount of local return received by cities with small populations. Signal Hill requests consideration of a $500,000 minimum funding level for small cities that can demonstrate: 1) they have roads classified as truck routes and bus routes; and 2) they can demonstrate that Measure M revenues collected from the city exceeds the amount it receives in local return.

The City of Signal Hill has consistently expressed concern about the use of the per-capita funding formula because a city's population alone does not reflect the wear and tear placed on local roads by goods movement, transit, and regional traffic. Signal Hill is located in the center of Long Beach, the 2nd largest city in LA County and the 7th largest city in the state. Due to our proximity to the Ports of Long Beach and Los Angeles, the Long Beach Airport, and I-405 freeway, Signal Hill roads are impacted by trucks, buses, and commuter traffic. All of Signal Hill's major roads are officially designated as truck routes and all but one serve as a public transit route. However, Signal Hill is estimated to receive only $155,000 in Measure M local return because of our small population.

Signal Hill asks Metro to consider that Measure M revenues are generated in cities that produce taxable sales. The roads in cities, such as in Signal Hill, are impacted by the trucks delivering taxable goods. Approximately $15 million will be collected in Measure M and Measure R transportation taxes from sales in Signal Hill. However, Signal Hill's combined annual share of local return from these programs is only $287,000. The estimated cost to repave a major arterial road is $1 million per mile and costs are increasing. Therefore, the City of Signal Hill is proposing the following practical minimum local return funding level that enables cities to perform meaningful projects:
A. Minimum funding level of $500,000 for cities that can demonstrate that its major arterial roads are designated as truck routes and bus routes; and

B. The amount of Measure M revenue collected from sales generated within the city exceeds the amount the city receives in local return.

C. Cities that do not meet the criteria in A and B above receive funding based on the per-capita formula.

The City of Signal Hill appreciates Metro’s consideration of our Measure M Local Return minimum funding proposal. I also want to thank Metro for hosting the Metro Mayors Roundtable and providing an opportunity to participate on the Local Return Working Group.

Sincerely,

Edward H. Wilson
Mayor

cc: City of Signal Hill Council Members
Janice Hahn – Los Angeles County Supervisor/Metro Board Member
Eric Garcetti – Mayor, City of Los Angeles/Metro Board First Vice-Chair
Robert Garcia – Mayor, City of Long Beach/Metro Board Member
YvetteKirin – Gateway Cities COG
From: Joanna Hankamer <jhankamer@weho.org>
Sent: Friday, May 26, 2017 5:12 PM
To: THEPLAN
Cc: Stephanie DeWolfe; Bianca Siegl; Perri Sloane Goodman; Norman Emerson (n.emerson@att.net)
Subject: West Hollywood has Draft Measure M Guidelines comments.
Attachments: WSCCOG Measure M Guidelines Comment Letter 05.25.17 (Final).pdf

Please see the below comments from the City of West Hollywood, the attached comments from the WSCCOG, and comments submitted separately from the LTSS.

WEST HOLLYWOOD COMMENTS:

3% local contribution
The City of West Hollywood supports the concept that any funds that the City spends on first/last mile and active transportation projects that would improve or support access to a light rail station (or a future light rail station) be considered as part of the City’s 3% contribution.

The LTSS suggests that additional language be added to clarify that major transit capital projects that require the 3% local contribution are for rail projects only. Currently this specific reference to rail is only included in the Program Methodology of this section. In the “Program Methodology” of this section, it states the calculation of the contribution is based on “dividing 3% of the projects total cost...by the number of new rail stations constructed on the line.” The City of West Hollywood supports the LTSS regarding this comment.

Definition of population for the local return allocation
The City of West Hollywood supports the consideration of day-time population and employment population in the definition of population for local return allocation.

Subregional Program (Planning for the Active Transportation Program)
While Measure M funds have been identified to support the implementation of active transportation projects, specific projects have yet to be developed by the individual cities/jurisdictions. Various stakeholders, including COGs, are currently proposing that funds be made available from Measure M for project development purposes. If these funds are made available by Metro for project development it is important that these new resources have flexibility to, for example:

- Go directly to cities for their pre-development activities to assist in bringing the respective active transportation projects on-line and demonstrate “timely-use-of-funds”.
- Allow the each COG the eligibility for reimbursement for interjurisdictional coordination between members (West Hollywood proposes that COG eligibility and reimbursement would need approval from COG members on a project-by-project basis).
- Be pooled by member cities for administration, planning support or both by the COG on interjurisdictional projects or efforts.
- Be expended annually or reserved for accumulation over several years to support a large interjurisdictional project or effort.

First/Last Mile (P. 37): The City of West Hollywood recommends that regional and/or local circulator service be added as an example of Eligible Projects.

Subregional Equity Fund
At the June 2016 Board Meeting, Director Fasana introduced an amendment to the Measure M Expenditure Plan to provide funding to all sub-regions equivalent to the allocation approved by the Board for the San Fernando Valley Transit project ($180 m). According to Metro the amount of the sub-regional equity funds identified for the Westside Cities totals $160.0 m. Additionally, another $235.0 m has been identified for the Central City Area of Los Angeles. (Note: a portion of the Northern Extension of the Crenshaw/LAX project runs through the Central Area).

The City of West Hollywood will request support from the WSCCOG to support the allocation of the full $160.0 m of the sub-regional equity funds to support the Northern Extension project, on the basis that 1) the Northern Extension project would connect five existing lines (Red, Purple, Expo, Crenshaw, and Green lines), effectively providing a "downtown LA by-pass," enhancing system-wide connectivity and enhancing connectivity to and throughout the Westside, 2) just as the WSCCOG matched the San Fernando Valley contribution of $1.7 billion to the Sepulveda Project, a similar partnership could leverage WSCCOG funds to attract matching Central Area funds, and 3) West Hollywood is the only member of the WSCCOG not being served by the Metro rail network.

Other issues (please describe)
Local Return Program - Public Transit (P. 77) – The City of West Hollywood recommends expanding "subsidized taxi" and "taxi coupon" to include "or similar point to point services."

Project-Readiness and Shovel-readiness.
Clarify the definition of these terms. It is unclear if different phases of work (planning, outreach) required to ready projects for funding are eligible for funding.

WSCCOG COMMENTS
May 25, 2017 Letter from the WSCCOG
Please also see comments in the attached letter from the WSCCOG.

LTSS COMMENTS
Please consider comments developed and submitted separately by the LTSS.

Thank you,

Joanna Hankamer
City of West Hollywood | 8300 Santa Monica Boulevard | West Hollywood, CA 90069 | T 323.848.6395 | jhankamer@weho.org
Thompson, Keira

From: Jason Smisko <JSMIKSO@santa-clarita.com>
Sent: Friday, May 26, 2017 10:20 AM
To: THEPLAN
Subject: I have Draft Measure M Guidelines comments.
Attachments: Measure M Comment Ltr.doc

Please see attached. Thank you.

Jason Smisko
Senior Planner
Traffic and Transportation Planning Services
City of Santa Clarita
23920 Valencia Blvd.
Santa Clarita, CA 91355

Phone: (661) 286-4171
Email: JSMIKSO@santa-clarita.com
Web: http://www.santa-clarita.com

City of SANTA CLARITA
May 26, 2017

Honorable John Fasana, Chairman
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

SUBJECT: City of Santa Clarita Measure M Policy Recommendations

Thank you for the opportunity to review and provide comments on the draft Measure M Guidelines. City of Santa Clarita staff has reviewed the draft Measure M Guidelines and provides the following comments, questions and recommended changes:

Comment No. 1

Page 70, Allocation Methodology: The City recognizes allocations based on the population shares from the projected populations in addition to discussions of the local return subcommittee recommending a minimum local return amount of $100,000. For any amount above that dollar figure, the City would require more analysis and further review. No increase in a minimum allotment over $100,000 is supported at this time.

Comment No. 2

Page 5, Project Readiness: Further clarification and definition of “Project Readiness” and “shovel ready” is requested.

Comment No. 3.

Page 5, The lapping policy is not consistent throughout the guidelines and should be revisited. Page 5 indicates that if a lapping policy is not included (such as in the 2% State of Good Repair section) then the process/rules will be adopted by the Metro Board hereafter. A lapping policy should be included in the adopted guidelines for each Measure M funding category.

Comment No. 4

Page 70, Allocation Methodology: Clarification is needed as to which date/year will be used for California State Department of Finance estimate. It is recommended that it be the May report of the year of the fund allocation.

Comment No. 5
Page 22, 26: Funding Plan, Community/Council Support: The Local Agency should not have to identify a match fund source in their Capital Improvement Program until the year the Local Agency is prepared to award the project.

Comment No. 6

Page 16, 86: Letter of No Prejudice, Advancing Projects: Please include additional language on the priority of funding/making whole projects that are working under a Letter of No Prejudice or received advanced funding.

Comment No. 7

Page 54, Regional Rail: The City supports the increase the allocation from 1% to 2% beginning in 2039.

Comment No. 8

Page 37, Clarification on eligible projects for Greenways and Green Streets: projects should be connected or germane to some type of travel and not detached park or open space improvements.

Comment No. 9

Page 50-51, Countywide BRT Expansion: It appears to be contradictory when in the first section the discussion mentions updating a 2013 BRT study to include additional corridors throughout Los Angeles County, but under the section Eligible Projects the first sentence states these funds are eligible for Metro BRT projects. Why only Metro BRT projects? What about the countywide efforts of other agencies that might be worthy of BRT projects in their community? Additional clarification is needed under the section Countywide BRT expansion.

Comment No. 10

Page 41, Metro Active Transportation 2% does not directly indicate that funds will be available to all jurisdictions for bike share programs. Can you clarify who will be able to receive these funds?

Thank you again for considering our questions, requests and suggestions. The City of Santa Clarita welcomes continued discussion on this.

Sincerely,

Jason Smisko
Senior Planner
Traffic and Transportation Planning Services
City of Santa Clarita
23920 Valencia Blvd.
Santa Clarita, CA 91355

Phone: (661) 286-4171
Email: JSMISKO@santa-clarita.com
Web: http://www.santa-clarita.com
Hello,

Will you please explain the recommendation made in this document:

http://metro.legistar.com/gateway.aspx?M=F&ID=6be840e2-10d4-40e0-9ac4-03b1b0526840.pdf

Bellflower's estimated annual allocation is $1.1M. Based on the recommendation being made, how will this amount be allocated to Bellflower in FY17-18?

Thank you.

Catherine J. Jun
Management Analyst II
City of Bellflower - Public Works
(562) 804-1424 ext. 2270
cjun@bellflower.org
Good afternoon Chair Fasana,

The City of Vernon appreciates the opportunity to comment on the Measure M Draft Guidelines as well as Metro’s willingness to consider a minimum local return funding level. Attached herewith is the City of Vernon’s comment letter.

The City of Vernon appreciates the importance of the Measure M projects and programs and looks forward to working with you and Metro staff.

If you have any questions please feel free to contact Kevin Wilson, Interim Director of Public Works at 323-583-8811 extension 245 or kwilson@ci.vernon.ca.us or me at 323-583-8811 extension 258 or carellano@ci.vernon.ca.us.

Claudia Arellano
City of Vernon
Public Works Department
4305 Santa Fe Avenue/Vernon, California 90058
323-583-8811 extension 258/Fax 323-826-1435
carellano@ci.vernon.ca.us

On behalf of Carlos R. Fandino, Jr., City Administrator

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May 23, 2017

The Honorable John Fasana, Chair
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012

SUBJECT: COMMENTS ON THE MEASURE M DRAFT GUIDELINES

Dear Chair Fasana:

The City of Vernon appreciates the opportunity to comment on the Measure M Draft Guidelines as well as Metro’s willingness to consider a minimum local return funding level. The City supports a practical minimum funding level that enables cities to perform meaningful projects. The current $100,000 per year proposal is inadequate. Vernon requests consideration of a $500,000 minimum funding level for small cities that can demonstrate they have and maintain roads classified as high truck-traffic routes, and that Measure M revenues collected from sales tax within that city exceeds the amount it receives in local return.

By way of background, Vernon has 49.1 miles of paved roads to be maintained including several major arterial roadways that serve regional goods movement from the Ports of Los Angeles and Long Beach, public transit and personal transportation needs of surrounding communities. All roads in Vernon are classified as truck routes. The City of Vernon has the largest network of heavy rail lines west of the Mississippi. Serving as a vital economic engine in the region, the City of Vernon houses more than 1,800 businesses including logistics companies, and manufacturers of apparel, furniture, glass, electronics, and paper products, supporting 50,000 jobs. Vernon’s businesses generate an average of $500 million in sales tax annually to the State. Offering an environment uniquely friendly to business, the City of Vernon requires a steady funding source for local transportation infrastructure.

The City of Vernon continues to have a major concern about the use of the per-capita funding formula because a city’s population alone does not reflect the wear and tear placed on local roads by goods movement, transit, and regional traffic. However, typical local transportation funding sources, such as Measure R, Proposition A, and Proposition C, are currently allocated on a per capita basis. Consequently, the City of Vernon does not receive an adequate share of these funds.
to maintain the public road network, due to the City’s small population. However, Vernon is estimated to receive only less than $2,800 if the per-capita formula is implemented for Measure M.

Vernon respectfully requests Metro to consider that Measure M revenues are generated from sales tax revenues. Approximately $5 million will be collected in Measure M and Measure R transportation taxes from sales in Vernon. However, Vernon’s combined annual share of local return from these programs is less than $6,000. This is simply not fair. The roads in cities, such as in Vernon, are impacted by the trucks delivering taxable goods. The estimated cost to repave a major arterial road is $1 million per mile and costs are increasing. Therefore, the City of Vernon is proposing the following practical minimum local return funding level that enables cities to perform meaningful projects:

1) Minimum funding level of $500,000 for cities that can demonstrate that its major arterial roads are designated as truck routes; and

2) The amount of Measure M revenue collected from sales generated within the city exceeds the amount the city receives in local return.

3) Cities that do not meet the criteria in A and B above receive funding based on the per-capita formula.

The City of Vernon appreciates Metro’s consideration of the above Measure M Local Return minimum funding proposal. The City of Vernon also thanks Metro for providing City staff an opportunity to participate on the Local Return Working Group.

Sincerely,

Carlos R. Fandino, Jr.
City Administrator

/Ca

c: City of Vernon City Council
    Samuel Kevin Wilson, Interim Director of Public Works
May 25, 2017

Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

{Electronic Submission}

Subject: Measure M Draft Guidelines

The City of Los Angeles Department of Transportation (LADOT) appreciates the opportunity to review and comment on the Measure M Draft Guidelines released by Metro on March 23, 2017. The guidelines provide the regulatory framework for the management and oversight of Measure M. LADOT supports this framework, which is informed by lessons learned from Measure R, to accommodate increased oversight and evaluation provisions. LADOT offers the following comments and recommendations:

- When referring to improvements that enhance safety, it should be clear that the focus is to enhance safety for all users of the transportation system.

- Local jurisdictions should have greater ownership of the sub-regional programs. With Metro’s support, cities should identify their priorities and specific projects that flow from program level funding in the sub-regional pots. We would welcome the opportunity to create performance measures and specific guidelines for the sub-regional programs to ensure transparent, and strategic investments that support the City’s adopted Mobility Plan.

- The final guidelines should revisit the current focus on shovel-ready projects to include pre-development activities. Early evaluation, initial project screenings, planning and pre-development activities are essential steps in delivering successful projects. Such activities should be eligible for funding. We would support a cap on these expenditures if necessary and a process whereby funds are allocated by phase to improve project delivery and transparency.

- There should be broader flexibility for use of funds for shared mobility strategies, Transportation Demand Management (TDM) measures, and autonomous / connected vehicle pilot programs.
beyond the "innovative project seed funding" identified in the draft guidelines. The final guidelines should ensure broad eligibility of programs that support behavior change (i.e. TDM), planning, project development, and data collection, not just capital projects. These investments amplify the use and efficiency of larger capital infrastructure.

- The final guidelines should clarify that Metro's Complete Streets Policy applies to all funding programs, including multiyear subregional programs, and define Metro's oversight role to ensure compliance.

- The Highway Program should have specific objectives and performance metrics consistent with statewide guidance from the Office of Planning and Research and best practices in planning and evaluation. The guidelines should not rest on outdated metrics as cities and the county evolve current transportation and mitigation programs to align with state law. To ensure consistency across programs, shared metrics should analyze benefits and impacts on public health, sustainability, and social equity. Given the high concentration of fatalities and severe injuries on state roads and highways, the highway program should include safety as a primary performance metric and project screening.

- More flexibility is needed on what qualifies for the 3% set-aside for the major transit capital projects. Per the draft guidelines, the 3% local contribution will only be calculated against the overall project scope and cost determined at the conclusion of preliminary engineering (30% plans). There should be consideration for any expenditures that are accrued prior to the 30% plan completion, inasmuch as the expenditures incurred are consistent with Metro's adopted complete streets and active transportation policies surrounding the fixed guideway stations.

Safety for all users and project delivery are at the core of LADOT's mission, and our comments reflect these guiding principles. Should you have any questions, please contact Dan Mitchell, LADOT Assistant General Manager, at 213-972-8432.

Sincerely,

Seleta J. Reynolds
General Manager

c: Jennifer Cohen, DOT
   Nader Asmar, DOT
   Carlos Rios, DOT
The City of Pasadena has reviewed the draft Measure M Guidelines and is submitting the attached comment letter that pertains to how “capital projects” are defined in the Multi-Year Subregional Programs (MSP) section.

- The “capital” definition in the MSP needs to identify as an eligible expense the acquisition of purchased transportation services, which includes contracted revenue service and fuel costs and does not include administrative costs.
- The acquisition of contracted transportation services has been an FTA capital definition since the 1990’s (49 U.S.C. 5310(b)(4)).
- Direct purchased transportation services and fuel costs have an explicit audit process through the annual National Transit Database (NTD) reporting.
- The eligibility of an expense as “capital” would be at the discretion of the Subregional Program.
- The acquisition of purchased transportation services and fuel costs were included in the Mobility Matrix as part of the capital projects.

Please refer to the attached letter for the comment letter in its entirety.

Thank you,

Sebastián Andrés Hernández
City of Pasadena - Dept of Transportation
Senior Planner
P (626) 744-7661
F (626) 396-8952
www.pasadenatransit.net
www.cityofpasadena.net/DialARide
May 24, 2017

Phil Washington, Metro CEO
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

RE: DRAFT MEASURE M GUIDELINES

Dear Mr. Washington:

The City of Pasadena has reviewed the draft Measure M Guidelines and is submitting the following comment that pertains to how “capital projects” are defined in the Multi-Year Subregional Programs (MSP) section.

On Page 22 of the MSP section, the last sentence in the introduction states, “all of the MSP funds are limited to capital projects.” The City of Pasadena recommends that with Subregional Program discretion, eligible projects, per the term “capital projects” in the Multi-Year Subregional Program, also include the acquisition of purchased transportation services that are required for the service delivery associated with the capital acquisition identified in the Mobility Matrix. This would thereby capitalize the direct cost of the purchased transportation services directly needed to implement the capital projects found in the Mobility Matrix, (e.g., revenue service and fuel costs) and would not include any administrative costs.

This approach is similar to that which is identified in the Federal Transit Administration (FTA) 5310 Traditional Capital Grant Program which includes as an eligible capital expense the acquisition of contracted public transportation services (49 U.S.C. 5310(b)(4)). This has been the included in the definition since legislation in the 1990’s. As such, the direct purchased transportation service and fuel costs are currently identified and audited as a part of these programs; this does not include any administrative costs, only direct purchased transportation costs.

As documented in the Subregional Mobility Matrix, the direct purchased transportation and fuel costs required to support expanded transit services were included; however, the Guidelines need to explicitly identify as an eligible capital expense the acquisition of direct
purchased transportation services that are required for the implementation of the capital projects identified in the Mobility Matrix.

Please note the following key points:

- The “capital” definition in the MSP needs to identify as an eligible expense the acquisition of purchased transportation services, which includes contracted revenue service and fuel costs and does not include administrative costs.
- The acquisition of contracted transportation services has been an FTA capital definition since the 1990's (49 U.S.C. 5310(b)(4)).
- Direct purchased transportation services and fuel costs have an explicit audit process through the annual National Transit Database (NTD) reporting.
- The eligibility of an expense as “capital” would be at the discretion of the Subregional Program.
- The acquisition of purchased transportation services and fuel costs were included in the Mobility Matrix as part of the capital projects.

With these changes, the City of Pasadena will be able to expand its locally provided transit services per the Mobility Matrix in its ongoing mission to provide sustainable local connections to the regional transit network.

Sincerely,

STEVE MERMELL
City Manager

TT: SAH

cc: John Fasana, Metro Board of Director
    Kathryn Barger, Metro Board of Director
    Ara Najarian, Metro Board of Director
    Mark Christoffels, Policy Advisory Council
    Terry Tornek, Mayor, City of Pasadena
    Fred Dock, Director of Transportation, City of Pasadena
Metro Staff,

The City of Malibu would like to submit the following comment regarding eligible projects under “Highway Efficiency and Operational Improvements Funding” on page 26:

In an effort to improve safety, trip reliability, travel times and traffic flow along the Pacific Coast Highway, the City of Malibu is currently working on a study which examines the effects of parking along this high volume heavily congested highway. It has been determined that parking along PCH has a direct effect on the safety and mobility of all travelers utilizing the highway. For this reason, one of the recommendations of the study is to relocate parking off the highway. The purchase of land for parking off of PCH would result in improved regional mobility, traffic flow, trip reliability, travel times and enhanced safety which by definition should qualify the project for Highway Efficiency and Operational Improvements funding.

For reasons described above, the City of Malibu recommends adding “the purchase of land or parking lots to improve safety and mobility” under the list of eligible projects for Highway Efficiency and Operational Improvements funding.

If you have any questions, or require additional clarification, please contact me at my office at (310) 456-2489 Ext. 247.

Sincerely,

Bob.

Robert L. Brager, PE, JD
Public Works Director/City Engineer, MTA TAC Member
City of Malibu, CA  90265
(310) 456-2489  Ext. 247
bbrager@yahoo.com
Dear Chair Fasana,

Andres Cuervo, the Chair of the Palms Neighborhood Council Transportation Committee and I, the Chair of the PNC Planning and Land Use Committee, would like to submit our comments to the draft Measure M guidelines. With the tight turnaround for comments, we were not able to formalize our comments with board action, so these represent our views only.

First, the guidelines are unclear what constitutes a "shovel-ready" project. Communities with projects in the pipeline need certainty as to what is eligible for funding. Currently, it is not clear if only the construction itself is eligible or if planning is also eligible. Please clarify those definitions in the final version.

Second, please clarify how projects are prioritized. The draft guidelines imply that priority is on a first come first served basis, but that would leave out later-identified projects with a greater community impact. Thus, the criteria should also include project quality and benefits in addition to the time of submission.

Third, how are projects identified in the first place? There does not appear to be a method to get a project included on the list. For many communities, they did not have input into the "mobility matrix" that now seems to be the main repository for future projects. Please ensure that there is a process for adding (and removing) projects and that stakeholders are fully informed in how projects are identified.

Fourth, many of the guidelines are placeholders for further development, but do not identify processes or timelines for such development. It is critical that stakeholders are included as greater specifics are developed so that communities' needs are met in a fair and equitable way. Please include steps to ensure that all stakeholders are involved in future guidelines development.

Finally, local return funds are available for "street" repair but it's unclear whether the definition of street includes alleys. Alleys are a vital arterial but have been neglected more than any other road and their deteriorated state is creating hazardous conditions. Please ensure that local return funds can be used for much-needed alley repair.

Thank you for your consideration,

Alison Regan, Chair PNC Planning and Land Use Committee  
Andres Cuervo, Chair PNC Transportation and Infrastructure Committee
Attached, please find a comment letter from the Foothill Gold Line Construction Authority regarding the Draft Measure M Guidelines.

Please let me know if you have any questions or would like any additional information.

Best,

Lisa

Lisa Levy Buch
Chief Communications Officer

Foothill Gold Line

Metro Gold Line Foothill Extension Construction Authority

406 East Huntington Drive, Suite 202, Monrovia, CA 91016
p 626.305.7004 f 626.471.9049 m 909.287.0161
llevybuch@foothillgoldline.org
www.foothillgoldline.org
April 25, 2017

The Honorable John Fasana
Chair, Board of Directors
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

RE: COMMENTS ON DRAFT MEASURE M GUIDELINES

Dear Mr. Fasana:

The Metro Gold Line Foothill Extension Construction Authority ("Construction Authority") has reviewed the Draft Measure M Guidelines, as well as the comments submitted by the San Gabriel Valley Council of Governments on April 24, 2017. Please consider the following concerns and recommendations as the Guidelines are finalized in the coming weeks:

- **Direct Funding from LACMTA to the Construction Authority:** Funding for projects identified as Major Projects in the Measure M Expenditure Plan should be provided directly from LACTMA to those project sponsors, such as the Construction Authority, and should not go through a subregional entity, nor require the approval or involvement of any subregional entity. This relates to Comment Nos. 1, 2, and 4 in the SGVCOG April 24 letter (Attachment 1).

- **Eligible Fund Contributions (Page 21 Draft Guidelines):** In-kind contributions should include city/agency staff time from the beginning of the environmental phase through the end of the warranty period or final acceptance, whichever is later. Such contributions should be counted regardless of whether they were calculated in the project costs and contribution amount.

- **Active Transportation Capital Improvement Contributions, Local Contribution Limits, or any other category re: 30% Plans:** The Guidelines should eliminate any requirement that investments (including betterments, capital improvements, first/last mile investments, other transportation investments, etc.) must be included in the preliminary engineering (30% plans) in order for such investments to be counted toward the 3% local contribution. Several of these references, for instance, are found on Pages 20 and 21 of the Draft Guidelines, and should be eliminated (see suggested changes on Attachment 2).
Guideline Applicability: The Measure M Guidelines should not apply to projects which have already concluded preliminary engineering (30% plans) as of the date that the Guidelines are adopted. Projects beyond the 30% plan phase are at a unique state of shovel-readiness that may be impacted negatively by new requirements, likely adding to project cost and to the overall delivery timeline.

Thank you for your consideration of these comments.

Yours truly,

[Signature]

Doug Tessitor

Attachment(s): 1. SGVCOG April 24, 2017 Comments to Chair Fasana
   2. Foothill Gold Line comments
April 24, 2017

Honorable John Fasana, Chairman
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

RE: DRAFT MEASURE M GUIDELINES

Dear Chairman Fasana:

The San Gabriel Valley Council of Governments (SGVCOG) has reviewed the draft Measure M Guidelines and provides the following comments and recommended changes:

Comment No. 1:

Throughout the document, Metro refers to the term “Project Sponsor” when discussing the programming and use of subregional funds. This term is not defined and opens the door for individual cities or other entities within a sub-region to take the lead in programming specific projects and seeking approval directly from Metro. The SGVCOG feels strongly that sub-regional programmatic funds\(^1\) were established and defined by the sub-regions and any project to be funded under these programs must come to Metro through a programming effort by the sub-regions.

To insure this is accomplished, the Measure M Guidelines should include a provision requiring Project Sponsors to have the concurrence of the sub-region (essentially, the COG's\(^2\) and joint powers authorities officially identified by Metro as regional planning agencies) prior to being included by Metro in their annual funding plan even if already included in the various adopted Mobility Matrices. To provide this concurrence, each COG should be required to adopt a five-year programming plan for each sub-regional program within their respective sub-region. The five-year programming plan would have to identify specific projects and phasing, allocated funding amounts, and project timing and be submitted to Metro. These programming plans would be required to be updated or amended on an annual basis reflecting executed funding MOU’s and project additions or deletions. Unless prohibited by the adopted guidelines, revenue constraints, or the Measure M ordinance, Metro would be required to adhere to these COG adopted sub-regional programming plans when executing funding MOU’s for specific projects. Should a project included in a COG adopted sub-regional programming plan be denied by Metro, each COG shall have the right to appeal the denial to the Measure M Oversight Board. Attachment A provides a flowchart of the proposed process.

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\(^1\) This does not apply to “Major Projects” identified in Measure M, for which Metro serves as the project sponsor.

\(^2\) Throughout this letter the term “COG” is intended to reference both Councils of Governments and joint powers authorities that are identified by Metro as regional planning agencies.

San Gabriel Valley Council of Governments
1000 South Fremont Avenue, Unit #42 • Alhambra, California 91803
Comment No. 2:
The guidelines allow for “Project Sponsors” to borrow from one Sub-Regional Program to accelerate the funding of a project in another Sub-Regional Program with the consent of the Metro Board and the “affected sub-region(s)”. The SGVCOG appreciates this flexibility, but would like to see language that requires the affected sub-regions to approve the proposed borrowing, by amending their affected adopted sub-regional programming plans as defined in our comment No. 1, to reflect the transfer of funds and acknowledging the associated timing impact for projects included in those sub-regional programs.

Comment No. 3:
The guidelines state that Measure M funds may be used for pre-construction as well as construction activities. Pre-construction activities are defined in the guideline and include “planning studies”. The SGVCOG recommends that this term be expanded to “planning and programming studies”. Adding the term “programming studies” will allow the sub-regions through their respective COGs to develop sub-regional project lists for corridor planning and coordination, and for subsequent project development and delivery. This will ensure that proposed projects complement each other and maximize mobility and/or sustainability.

Comment No. 4:
The Measure M Guidelines regarding Sub-Regional Equity funds state that Metro may meet these obligations using “any combination of federal, state or Metro controlled funds including, but not limited to, Measure M.” SGVCOG appreciates the need for this flexibility, however this flexibility being sought by Metro potentially places significant grant compliance requirements on sub-regions that may conflict with proposed projects or uses of those funds. The guidelines should be revised to not allow Metro the ability to unilaterally determine that a sub-region’s funding requirement under the “Sub-Regional Equity Fund” be met with something other than Measure M. Such a funding substitution should only be allowed with the affected COG (sub-region’s) concurrence. In addition, the SGVCOG requests that uses of the “Sub-Regional Equity Fund” be expanded to include the use of these funds for bonding capacity to accelerate proposed projects within the other sub-regional programs.

Comment No. 5:
The definition for eligible uses for the “Highway Demand Based Program” should include park and ride facilities, as well as other ridesharing related facilities.

Comment No. 6:
Under the section “3% Local Contribution to Major Transit Projects”, the guidelines state that “betterment work” funded by the local agency and as defined as “a change that will improve the level of service and/or capacity, capability, appearance, efficiency or function over that which is required by the Metro Design”, shall not be counted towards the 3% required local contribution. The SGVCOG disagrees with this exclusion and would like to see the guidelines amended to allow such betterment work to be counted towards the 3% local contribution. Any capital investment that enhances and improves the operation of the transit system and funded by a local agency should be desirable to Metro and should not
be discouraged by not allowing this type of betterment work to be counted towards the required 3% contribution.

Comment No. 7:
Under the section “3% Local Contribution to Major Transit Projects”, “in kind” local contributions as defined should include the cost of staff time from the commencement of the environmental phase through the end of the warranty period.

Comment No. 8:
Under the section “3% Local Contribution to Major Transit Projects”, local contribution limits are determined at the conclusion of preliminary engineering (30% plans). The guidelines need to have language to address projects that have already exceeded this point such as the Gold Line Foothill Extension. How will local contribution be determined for that project? SGVCOG suggests that language be added that states for projects that have exceeded preliminary engineering as of the initial adoption of the these Measure M guidelines, Metro shall consult with the local affected agencies to determine the appropriate project scope and cost estimate to determine the local contribution limits.

Comment No. 9:
Under local return, Metro is currently recommending a $100,000 annual minimum allocation for small population cities that would normally receive less than this amount. The SGVCOG does not object to this proposal, however is not in favor of increasing this amount beyond the current recommended $100,000 minimum.

Comment 10:
Upon the approval of the Measure M Guidelines and the initiation of project funding MUO’s, the SGVCOG requests that they be included in all communications from Metro to Project Sponsors related to the allocation and use of sub-regional funds assigned to the SGVCOG’s sub-region.

Sincerely,

Cynthia Sternquist, President
San Gabriel Valley Council of Governments

cc: SGVCOG Board of Directors
Metro Board of Directors
Phillip Washington, CEO, Metro
3% LOCAL CONTRIBUTION TO MAJOR TRANSIT PROJECTS

INTRODUCTION

The Measure M Ordinance includes a provision for 3% local contribution to major transit capital projects. The rationale for the contribution is that local communities with a fixed guideway station receive a direct benefit due to the increased access to high quality transit service that is above and beyond the project's benefit to the County as a whole. Countywide, the 3% local funding contribution represents approximately $1 billion in funding to support the project delivery identified in the Expenditure Plan. The 3% local funding contribution is a critical element of a full funding plan for these transit projects. The Ordinance includes provisions that allow development of a mutual agreement between a Jurisdiction and Metro, and a default penalty if such an agreement cannot be reached. The agreements shall be in accordance with these guidelines.

PROGRAM METHODOLOGY

The Ordinance calculates the local contribution based on the centerline track miles within a local jurisdiction with a new station in those jurisdictions. These guidelines reflect the nexus between mobility benefits provided to a jurisdiction based on the location and proximity of a new station. The local contribution will be calculated by dividing 3% of the project's total cost, estimated after the conclusion of preliminary engineering (30% plans), by the number of new rail stations constructed on the line. For purposes of this section, determination of the local jurisdiction borders will be a new station located within one-half mile of the jurisdiction. Building on the Metro Board adopted First/Last Mile policy in 2016, which defines the “walkshed” around each station as a half-mile radius, the 3% local contribution requirement will be proportionately shared by all local agencies based upon the local agency’s land area within a one-half mile radius of a new station. Other arrangements agreed upon by every local jurisdiction in a project corridor with a local contribution obligation are also acceptable, provided that the total of all jurisdictions' contributions equals 3% of the estimated project cost. A list of jurisdictions that may be affected, subject to changes determined by the environmental process, is included as Appendix A.

An agreement approved by both Metro and the governing body of the jurisdiction shall specify the total project cost as determined at the conclusion of preliminary engineering (30% plans), the amount to be paid by the local jurisdiction, and a schedule of payments. Once approved, the amount to be paid by the local jurisdiction shall not be subject to future cost increases. The jurisdiction may request a betterment for a project. The jurisdiction, however, shall incur the full cost of any such betterment without credit towards the required 3% local contribution. A betterment is defined as a change that will improve the level of service and/or capacity, capability, appearance, efficiency or function over that which is required by the Metro Design Criteria and the environmental document at the time the project is advertised for any construction-related bid. This definition can be revised by the Metro Board through revisions to these Guidelines.
Eligible Fund Contributions

Eligible fund sources to satisfy 3% local contribution include any funds controlled by the local agency or local agencies (e.g. General Fund, State Gas Tax Subventions, Prop. A, Prop. C and Measure R and M Local Return Funds, Measure M Subregional Program Funds), or any funds awarded from non-Metro competitive grant process funding. Measure M Subregional Program Fund contributions must be accompanied by documented agreement from all jurisdictions that would otherwise be eligible for those sub-regional funds. In-kind contributions eligible to satisfy 3% local contribution include project specific right-of-way and waiver of permitting fees, if calculated in the project cost and contribution amount.

Active Transportation Capital Improvement Contributions

These guidelines reflect provisions adopted by the Board that allow for local jurisdictions to meet all or a portion of their 3% local contribution obligation through active transportation capital improvements and first/last mile investments that are included in the project scope and cost estimate at the conclusion of preliminary engineering (30% plans). All local improvements must be consistent with station area plans that will be developed by Metro in coordination with the affected jurisdiction(s). The criteria for local first/last mile investments for first/last mile contributions are being developed by Metro, specifically to carry out integration of first/last mile within transit capital projects.

Local Contribution Limits

The 3% local contribution will only be calculated against the overall project scope and cost determined at the conclusion of preliminary engineering (30% plans). Local agencies cannot count other transportation investments that are not included in the project scope and cost estimate after the conclusion of preliminary engineering (30% plans). Metro staff will provide written notice to the affected jurisdiction(s) and a report to the Metro Board at the completion of 30% engineering completion.

Opt Out Option

Metro will withhold up to 15 years of Measure M Local Return Funds for local agencies that fail to reach a timely agreement with Metro on their 3% contribution prior to the award of any contract authorizing construction of the project within the borders of that jurisdiction. Local return funds from Proposition A, Proposition C, and Measure R are not subject to withholding. In some cases, principally in smaller cities, the default withholding of 15 years of local return from only Measure M Local Return Funds will be less than a formal 3% contribution. In these cases, the cities which default on making their full 3% contribution will suffer no further impact.

Guideline Applicability

These guidelines do not apply to projects which have already concluded preliminary engineering (30% plans) as of the date these guidelines are adopted.
Dear Metro Staff and Board of Directors,

On behalf of Neighborhood Housing Services of Los Angeles, please see the attached comments on the draft Measure M guidelines. Please do not hesitate to contact us with any questions.

Sincerely,

Alex Visotzky

Alex Visotzky
Policy and Development Analyst
Neighborhood Housing Services of Los Angeles County
3926 Wilshire Blvd, Suite 200
Los Angeles, CA 90010
(213) 381-2862 ex. 249 | avisotzky@nhslacounty.org

Visit us at www.nhslacounty.org
Strengthening Communities for over 30 years
May 5, 2015

Phil Washington
Chief Executive Officer
Metro
One Gateway Plaza
Los Angeles, CA 90012

Dear Mr. Washington,

On behalf of Neighborhood Housing Services of Los Angeles County (NHS), we were thrilled to watch the passage of Measure M in November 2016, providing needed funding to build the infrastructure that Los Angeles needs for a sustainable, equitable future.

We appreciate that Metro is undertaking a broad-based, inclusive process to ensure that community voices are helping to drive the implementation of Measure M. We know all too well that large scale projects that fail to consider community needs can ultimately be at risk of failing to achieve their objectives, and appreciate Metro’s serious approach in this regard.

NHS has been serving residents throughout Los Angeles County since 1984, serving as a catalyst for local residents, business, and government representatives to work together to build stronger neighborhoods. We strengthen communities through the development and maintenance of quality affordable homes, creation and preservation of affordable homeownership opportunities, support of local leaders, providing financial education and increasing the financial independence of families and people in need.

We would like to offer our comments on the Measure M Draft Guidelines. These comments include our suggestions on:

- Administration and oversight
- Local contributions to major projects, and
- Local return funding.

Administration and Oversight

We applaud Metro’s efforts to create accountability in the expenditure and oversight of Measure M funds and believe that the seven-member Independent Taxpayer Oversight Committee will be an effective body to carry out this function. However, in the interest of continuing to keep community interests and equity at the forefront of these conversations, we urge the Metro board to add two members to the committee to represent these interests.

Local Contributions to Major Projects

We encourage Metro to consider exceptions to the 3% local contribution requirement for municipalities where the median income is low relative to other municipalities in Los Angeles County. We are concerned that small municipalities with sizable low-income populations and
above average unemployment may be disinclined from moving forward with needed infrastructure projects because of the 3% contribution requirement.

These municipalities have some of the greatest needs for transit links and infrastructure, which would ensure that their residents have better access to good jobs and economic opportunity. Yet these municipalities, often smaller, have less flexibility in their budget to finance 3% of a large transit project. We encourage the Board to consider exceptions to this requirement when a locality's median household income is below $50,000 and create a process for them to apply to use County funds to meet their 3% requirement. This will create more equity between municipalities, which will increase access to opportunity for the County's low-income residents.

**Local Return Funding—Transit Oriented Communities**

We appreciate that Metro is including transit-oriented communities (TOC) as a component of its local return strategy. However, we urge Metro to deeply consider how to use Measure M to create and preserve transit-oriented communities and urge development that does not displace core transit riders and preserves Los Angeles’ existing affordable housing while creating incentives to build new affordable housing.

We are concerned that Metro’s language on TOCs does not consider housing affordability, which is an essential component of a sustainable future for Los Angeles. According to Metro’s own customer survey in 2015, the median household income of bus riders was $14,876, and the median household income of train riders was $19,374. Low-income people are the core users of public transit, and a housing affordability crisis threatens to displace these riders. According to 2014 American Community Survey data, between 92% and 94% of renters earning under $35,000 were cost burdened, while 65% to 83% of low-income homeowners were cost burdened.

Both low-income renter and homeowner populations are being displaced from transit-adjacent areas. According to CoreLogic data, over 200 homeowners living in the zip codes along the future Crenshaw-LAX line received a notice of default or notice of sales during the first quarter of 2017 alone. This portends a rise in foreclosures for residents that should otherwise stand to benefit from these transit investments. And new homebuyers and renters do not fit the profile of public transit users and riders. Along the Crenshaw-LAX line, the median income of approved home purchase from 2013-2015 was $94,000 according to Home Mortgage Disclosure Act data, far higher than the 2015 median household income along the Crenshaw-LAX line of $39,281.

Measure M local return funding presents an unparalleled opportunity to mitigate displacement and ensure that affordable transit-oriented communities become a reality, not just an aspiration. As such, we encourage the board to emphasize in the Measure M guidelines the possible uses for local return funding, and that these uses include mechanisms to create and preserve affordable home opportunities for the core transit riders that are at risk of displacement. We recommend that 15% of local return funding go toward affordable transit-oriented communities. These uses of transit-oriented communities funding should include measures such as:
• Foreclosure prevention and mortgage assistance counseling for low- to moderate-income homeowners that are at risk of displacement within TOC(s),
• Affordable home rehabilitation for low-income seniors and others that rely on public transit and are at risk of displacement,
• Down payment assistance targeted at low- and moderate-income homebuyers to ensure that a diverse array of residents are able to enjoy the benefits of transit investments,
• Capitalizing a housing preservation fund to enable the acquisition, rehabilitation, and long-term stabilizations of affordable housing properties in transit priority areas by non-profit organizations,
• Funding an emergency assistance fund to prevent evictions, with outreach targeted to rental tenants in transit priority areas.

NHS appreciates Metro’s additional consideration of issues such as TOC(s), and the transparency with which this process has been conducted. Please do not hesitate to contact me with any questions or concerns at lgay@nhslacounty.org or (213) 381-2862.

Sincerely,

Lori Gay
President and Chief Executive Officer
Please confirm that these comments were received. I couldn't upload these from the weblink.

Gregory Farr
Region Chief, Externally Financed Projects
California Department of Transportation
(213) 897-0208
Caltrans Comments on Measure M Draft Guidelines

Page 6. COST CONTAINMENT POLICY FOR EXPENDITURE PLAN MAJOR PROJECTS
Add: “D) Settlement of construction claims.”

What about scope changes? Standards change with time. There are safety, code, or statutory requirements that change and must be implemented on a project while in construction.

Page 7. MEASURE M RECOGNITION

What if the project has both Measure R and Measure M funds? Will 2 logos be required or a combined logo?

Page 8. AUDITS

Who is auditing who? Will the Independent Audit Firm only be auditing Metro’s files and/or agency files? Will all agency projects be audited every year?

MULTI-YEAR SUBREGIONAL PROGRAMS

Page 25. MULTI-YEAR PROGRAMS (HIGHWAY SUBFUNDS)

Third paragraph: space after period “themes.The”

Edit as shown in red text:
*Pre-construction activities* such as planning/preliminary studies, project initiation documents, environmental clearance, design and right of way, to define the purpose and need, project limits, deficiencies, and actual total project cost.

Pages 26-29. Delete in Sections A – F (missing F) all instances of “State of good repair, maintenance and/or beautification projects are not eligible for Highway subfunds.” Other than beautification, state of good repair and maintenance should be allowed under Measure M: “

“Capital Improvement Expenditures” means expenditures for the purpose of acquiring, upgrading, or maintaining transportation physical assets such as property, transportation facilities, rail improvements, highways, or equipment, so long as any such expenditures for maintenance substantially extend the useful life of the project.”

Page 27. The section titled *Highway Demand-Based programs definition*, modify sentence:

Managed lane projects include high-occupancy vehicle (HOV) lanes, access control or special use lanes, direct access ramps, and high occupancy toll (HOT) lanes, Active Traffic Management (ATM) projects such as Dynamic Lane Control, Hard Shoulder Running, Junction Control, Queue Warning, and related strategies as defined by FHWA.

Page 29. Add Section “F” in front of “Transportation System and Mobility Improvements”

Page 31. Change paragraph as shown:

All freeway-to-freeway interchange projects and major freeway improvement
PSRs/PDSs project initiation documents and PAEDs funded through Measure M must consider an ExpressLanes alternative for corridors identified in the Metro Countywide ExpressLanes Strategic Plan.

Page 86. Change 2nd paragraph as shown:

A jurisdiction may advance an approved Measure M LR project using City/County/State funds, to be subsequently reimbursed by Measure M LR funds.

General Comment: Is there anything in the guidelines to address mitigation agreements with private developers. Local jurisdictions or the State may have collected development mitigation fees, however, a Measure M match may be needed to complete the project.
Here is the letter and detailed comments from Eco-Rapid Transit.

Michael R. Kodama, Executive Director

Eco-Rapid Transit
16401 Paramount Boulevard
Paramount CA 90723
Tel: (562) 663-6850 - Fax: (562) 634-8216
Cell: (818) 468-8593

Orangeline Development Authority – ECO-RAPID TRANSIT
www.eco-rapid.org

Virus-free. www.avast.com
May 10, 2017

Mr. John Fasana, Chair, Board of Directors
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza Drive
Los Angeles, CA 90012

Re: Comments on the Measure M Master guidelines

Dear Chair Fasana:

The Board of Director of the Eco-Rapid Transit Joint Powers Authority appreciates the opportunity to review and comment on the Draft Master Guidelines for the Expenditure of Measure M tax revenues. We understand the aggressive adoption schedule but are seeking assurance that careful consideration of comments/clarifications will still be forthcoming. We have concern over the May 26th comment deadline for comments and the proposed June 22 MTA Board adoption date and whether there is sufficient time to review and consider comments as well as have a meaningful dialog with the Policy Advisory Council.

We look forward to an open and comprehensive process for the development of the more specific guidelines that will be developed over the coming year.

Measure R recognized the importance of subregional project delivery and the customized approach each subregion has utilized for project development and implementation. We appreciate the efforts of MTA staff in partnering with the Eco-Rapid JPA to create a community-based process for the planning and development of the rail project which will highlight a successful model of a consensus driven subregional project development and Implementation.

The subregional effort that created the Measure M Expenditure Plan was also a “grounds – up” effort that resulted in all subregional priorities accounted for in the Expenditure Plan. The Draft Measure M guidelines pull back from supporting this approach, requiring jurisdictions to either utilize Local Return or other funds for project development. Additionally, project readiness has been identified as the sole determinant of receiving funding within a yearly timeframe.

The following attachment provides specific comments on the Draft Guidelines. If there are any questions, please call Michael Kodama, Executive Director at 562 663-6850

Sincerely,

Maria Davila, Chair
Chair, Eco-Rapid Transit

cc:  Members, Eco-Rapid Transit
Eco-Rapid Transit Comments

- P. 4 - The Master Guideline is more an "evolving Framework" where some guidelines are fully articulated (Local Return, Transit Operations) and others are yet to be development. Many of the expenditure details do not currently exist. Over the next year it would be helpful for a schedule to be developed supporting the creation of the outstanding guidelines and continue to engage all stakeholders in the development of the individual guidelines.

- P.6 – Consideration for acceleration should also include the potential for a project to be included or receive funding from special or one-time state or federal programs including those that relate to highways of national significance or primary freight corridors, and for stimulating 3P opportunities.

- Transit Contingency Subfund. All Net Revenues allocated to the Transit, First/Last Mile (Capital) Subfund, except those allocated to Metro State of Good Repair, that are not assigned to a specific project or program coded “T” in the "modal code" column of Attachment A shall be credited to the Transit Contingency Subfund. Creating a Contingency fund from net revenues assigned to each mode may result in projects first in line receiving funds to the detriment of projects slower to develop. Measure M has an ambitious revenue project which in all probability will exceed revenues, additionally the Subregional Equity Funds were not anticipated or accounted for in the cashflow, and it may be difficult for a Contingency fund to be realized without delaying projects that may require a longer timeframe to become shovel ready.

- There needs to be the same consideration for debt service to support the delivery of MSP programs as well as the major projects.

- P.10 – Could the transfer between Capital and Program subfunds affect or be affected by the creation of the contingency fund?

- P. 14 - Will there be any reconciliation of yearly actual receipts within the five-year estimate of the cashflow model?

- P. 18 – Subregional Equity Funds are not allocated in the Multi-year Program for the First year with the exception of the North SFV Bus Rapid Transit Improvements. All subregions should receive equal consideration and receive an allocation in 2018.

- P. 20 – Will there be an adjustment for the 3% contribution based upon the profile of the alignment contained within or adjacent to the jurisdiction? Should a city with at-grade be expected to contribute to the construction of more costly aerial or subterranean segments of the transit line? This distinction is not clear. It
appears that the 3% will be calculated on the entire project and not just determined by the section within the ½ mile vicinity of the local jurisdiction.

Betterments which are defined "as a change that will improve the level of service or capacity, capability, appearance, efficiency or function over that which is required by the Metro Design Criteria and the environmental document at the time the project is advertised for construction-related bid" are excluded from the 3% local contribution. A wholesale elimination of betterments may deter private investment that can improve the safety and functioning of the station or station area. We suggest that a process be developed to integrate carefully planned betterments (or defined portions of a betterment) that provides a station or system benefit.

It is unclear whether it is the timing of the betterment (post- as opposed to pre-construction bid) or if the Ordinance intended to assign no benefit to a betterment that meets the criteria and anticipates that jurisdictions (or developers in conjunction with jurisdictions) will be willing to contribute the 3% and potentially invest in betterts that serve the transit system. Either way, not crediting a betterment that meets the exacting definition seems counterproductive to creating a first class system.

The rules that govern the crediting of First/Last Mile projects to the 3% local contribution should apply to certain betterments as well. Additionally there should be consideration for the construction of housing or TOC development adjacent to the stations that provides direct or indirect system benefit such as: enhanced ridership, joint parking, pedestrian amenities, bicycle amenities and enhanced lighting and security.

- P. 21 – The criteria for local first/last mile investment contributions should be developed in a collaborative manner by MTA in conjunction with the COGs and LA County cities that will bear the responsibility for implementing these improvements. There should be an ability to negotiate, on a case by case basis, an additional transportation project investment after the conclusion of the 30% PE. Flexibility to work with private developers interested in improving station access/safety/security should not be arbitrarily rejected after PE.

- P. 21 – Opt Out Option – The language for the opt-out provision requires more specificity as to what may be negotiated or what the parameters are for failing to reach "a timely agreement".

- P. 22 – MSP funds by definition are limited to capital projects. This is followed by criteria that describes project readiness and specified those activities that define construction readiness. These descriptions include pre-construction items that might be considered project planning and development. More discussion needs to occur to help define this phase and ways to assist disadvantaged communities
through this process. Smaller jurisdictions may have difficulty advancing projects for competition under the existing MSP project readiness.

- P.41, P. 75 – The definition of Active Transportation should be expanded beyond "non-motorized, human-powered mode of transportation..." described in the Local Return section. This specificity excludes other current and future "slow speed" modes and the facilities to improve the safety of their use in public rights-of-way. Examples of excluded modes include e-bikes, slow speed scooters, e-scooters, etc. – besides all of the other innovative modes that may be introduced through future public or private sector programs. Considering the aging demographics in LA County, the regional, sub-regional and local return guidelines should be broadened and consistent to include eligibility for all electric-power assisted slow speed modes and the facilities that improve the safety of these modes.

- P. 48 – Visionary Project Seed Funding: this is a laudable expenditure of funds and also verification that Measure M funds can be used for more than capital expenditures. The only issue is the match is extreme and may be difficult for some of the eligible applicants to meet, even major universities or colleges. Suggest that the match be reduced to 20% and allow for in-kind contributions including staff. The Eco-Rapid Transits JPA is interesting in partnering with the MTA and other agencies to involve local communities in the “place-making” surrounding station areas in addition to process for transit system development.

- P. 52 – The language for the Subregional Equity Funds is tenuous on the availability of these funds. In order for the Measure M to be equitable to all subregions, the cashflow should mirror the funds availability accorded the San Fernando Valley. The five-year allocation increment is workable, however, the “if any” should be removed as there should be an established cashflow for subregional projects even if debt service is required. Additionally the Draft Guidelines regarding Sub-Regional Equity funds should not allow MTA to meet its obligations using “any combination of federal, state or MTA controlled funds including, but not limited to, Measure M.” This flexibility being sought by MTA potentially places significant grant compliance requirements on sub-regions and lead agencies that were not specified in the Measure M Ordinance. Exclusively allocating Measure M sales tax to other agencies would be consistent with a long held MTA practice of retaining more difficult to handle state and federal funds for large infrastructure projects where tracking and procurement systems are already in place.

Before any Subregional Equity Program funding is allocated, MTA should work with each subregion to identify which projects and programs are priorities for this funding. The $244 million will be a good source for meeting project goals in manner that produces subregional mobility benefit.
There is a disconnect between funding projects on a “First come, first serve – project readiness” criteria and mobility benefit. How will funds distributed in this manner contribute to Measure M program objectives let alone meet any sort of mobility goal. What is the incentive for smaller jurisdictions to band together to create a large, more impactful project when this may take longer than an uncoordinated singular effort?

- P. 82 Coordination Approach – The language urging the coordination of Measure M Local Return funded projects should be expanded and placed in other guidelines. There should be incentives for interjurisdictional coordination throughout the Guidelines encouraging and maximizing mobility across city boundaries. The Councils of Government can be an important contributor to viewing mobility through a systems approach.
Hi Dave,

Thank you for the feedback. By way of this response, I’m also forwarding your pdf to theplan@metro.net, Metro’s central repository for Measure M guidelines comments.

Timothy Mengle
LA Metro
Director, Budget
Office of Management and Budget
213.922.7665
metro.net | facebook.com/losangelesmetro | @metrolosangeles
Metro provides excellence in service and support.

Dave J. Hernández | Assistant the the Deputy CEO
Long Beach Transit | lbtransit.com
(P) 562.489.8485 | (E) dherandez@lbtransit.com
1963 E. Anaheim St., Long Beach, CA 90813

“Dedicated to connecting communities and moving people... making everyday life better.”
From: Cayetano, Rufus [mailto:CAYETANOR@metro.net]
Sent: Thursday, April 20, 2017 12:28 PM
To: Hernandez, Dave <dhernandez@lbtransit.com>
Subject: RE: URGENT: LACMOA Response to Draft Measure M Guidelines

Dave,

Thank you. Actually, I am only responsible for the Measure M 20% Transit Operations piece. Please send comments to Tim Mengle at menglet@metro.net.

Rufus

From: Hernandez, Dave [mailto:dhernandez@lbtransit.com]
Sent: Thursday, April 20, 2017 11:59 AM
To: Cayetano, Rufus
Subject: RE: URGENT: LACMOA Response to Draft Measure M Guidelines

Rufus-
Please find the proposed edits to the draft attached.
If pressed for time, I would be happy to make the edits.
Best,
Dave

From: Cayetano, Rufus [mailto:CAYETANOR@metro.net]
Sent: Thursday, April 20, 2017 10:54 AM
To: Hernandez, Dave <dhernandez@lbtransit.com>
Subject: RE: URGENT: LACMOA Response to Draft Measure M Guidelines

Dave,

Please send the comments for me to review.

Rufus

From: Hernandez, Dave [mailto:dhernandez@lbtransit.com]
Sent: Thursday, April 20, 2017 10:53 AM
To: Cayetano, Rufus
Subject: FW: URGENT: LACMOA Response to Draft Measure M Guidelines

Hello Rufus-
I'm Debra Johnson's assistant here at Long Beach Transit and recently printed out the draft Measure M Guidelines for her review. In reviewing the document, I noticed a few typos/suggested edits. Jane Leonard informed me that this is Metro's document and suggested I reach out to you in case if you were interested in seeing the mark-ups.

I know this document is still very much in draft format, but let me know if you'd like for me to send the comments for your review.

Best,
Dave

---

Dave J. Hernández | Assistant the Deputy CEO
Long Beach Transit | lbtransit.com
(P) 562.489.8485 | (E) dhernandez@lbtransit.com
1963 E. Anaheim St., Long Beach, CA 90813

"Dedicated to connecting communities and moving people...
making everyday life better."

Begin forwarded message:

From: "Leonard, Jane" <jane.leonard@culvercity.org>
Date: April 19, 2017 at 12:53:14 PM EDT
To: "aaugilar@santa-clarita.com" <aaugilar@santa-clarita.com>, "amoreno@cityofirma.org" <amoreno@cityofirma.org>, Amy Ahdi <amy.ahdi@redondo.org>, Andre Colaiace <colaiace@asila.org>, "Ida, Art" <art.ida@culvercity.org>, Barbara Andres <barbara.andres@smgov.net>, "ckonisek@avta.com" <ckonisek@avta.com>,
"claudem@ci.commerce.ca.us" <claudem@ci.commerce.ca.us>, Corinne Ralph <corinne.ralph@lacity.org>, "Dana Pynn (dpynn@gardenab.doc)" <dpynn@gardenab.doc>,
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Eric Yan <evan@cityofmontebello.com>, "Ernie Crespo (ecrespo@gardenab.doc)"
<ecrespo@gardenab.doc>, "JamesLee@torranceca.gov" <JamesLee@torranceca.gov>, "Leonard, Jane" <jane.leonard@culvercity.org>, Jim Parker <jpark@norwalkca.gov>, "Joseph Loh (jlo@gardenab.doc)" <jlo@gardenab.doc>, "Joyce.rooney@redondo.org"

Subject: URGENT: LACMOA Response to Draft Measure M Guidelines
Hello, LACMOA Members –

Please be advised that the timeline for replies to the Draft Measure M Guidelines has been tightened. Art must attend the Providers sub-group of the Policy Advisory Committee (PAC) on MONDAY MORNING 4/24 – at the same time that our LACMOA meeting was scheduled to gather our agency information for submission. We have received an email from the PAC Provider Group coordinator indicating that the deadline for our comments (LACMOA as part of the Provider Group) is this Friday, April 21st, so they can prepare for their meeting on Monday 4/24. Our meeting this Monday 4/24 will be canceled.

So – Here is our Plan B:

1. Review the Draft Measure M Guidelines
2. Prepare your comments and feedback from your agency.
   a. These need to be clear and concise, and preferably in bullet-point format.
   b. Please understand and consider that comments from our 16 agencies will then be synchronized into one document/response from LACMOA and submitted to the PAC Providers through their online survey portal.
3. Email your comments to Art (art.ida@culvercity.org) and myself (jane.leonard@culvercity.org) no later than tomorrow, Thursday, April 20th at 5:00 pm.

If you have any questions, please contact Art as soon as possible at 562-505-8182 (mobile). We are caught in a very fast-moving current and will do our best to meet the deadlines imposed.

Thank you very much.

Jane

B. Jane Leonard
Sr. Management Analyst / Transit Finance & Grants
Culver City Transportation Department
310-253-6523
jane.leonard@culvercity.org
Hello,

Attached are documents in comment on Measure M Guidelines.

Thank you,

Denny Zane
Executive Director, Move LA
310-570-5870
Dennyzane@MoveLA.org
May 23, 2017

John Fasana, Chair
Los Angeles County Metropolitan Transportation Authority
Re: Measure M Guidelines/Priorities for Metro action in implementation of Measures R and M

Chairman Fasana and Members, LA Metro Board

When voters went to the polls to approve Measure R in 2008 and Measure M in 2016 with such overwhelming majorities, there is little doubt in our minds that they were doing so principally in hopes of reducing the severe traffic congestion that plagues Los Angeles County. These measures offered them a vision for doing so, primarily by investing tax dollars to ensure a diverse and robust transit system as an alternative to our community’s longtime dependence upon our cars for mobility.

Unfortunately, throughout this same decade there has been a significant decline in transit ridership on the Metro system. This decline is not solely on the bus system; a ridership decline has also occurred on the Red Line and the Green Line.

We encourage you to make reversing this decline in ridership one of the highest priorities for LA Metro in the implementation of Measures R and M, especially in programming the 20% Transit Operations funds in Measure M and in how you use SB 1 transit operations funds.

There has been much speculation about the causes of this ridership decline on the Metro system. A close examination of this decline in transit ridership reveals that it correlates closely to actions taken by Metro during the Great Recession to address fiscal uncertainties. In particular, Metro restructured the bus system around 2010 and adopted a fare increase in 2014. We suggest that these two actions may be among the important causes of our transit ridership decline, though larger demographic or economic changes may also be factors.

This suggests that ridership declines may be well within Metro’s power to remedy, using the tools in its own tool box creatively and strategically.

One part of the solution certainly could be expanding transit services to targeted populations such as seniors, people with disabilities and students. Such efforts could be a key part of a larger strategy to rebuild transit ridership on the bus system, as well as on the affected rail lines.

We believe that this is consistent with the intent of the voters in approving both Measures R and M. Pre-election polling for both measures and Metro’s ballot statement for Measure M in particular indicated that reducing traffic congestion as well as enhanced transit services for these populations were priorities both for voters and for Metro.

Fortunately, Metro now is well positioned to enhance such services. The approval of Measure M with 20% of its funds to Transit Operations along with the recent approval by the state legislature and the governor of SB 1 with significant new funds for transit operators will provide Metro significant new resources needed to develop such ridership programs.

If there is a will, there certainly is a way.

In our attached memo, we will look more closely at these issues and offer Move LA’s recommendations for Metro action.

Thank you for your consideration.

Denny Zane
Executive Director
Move LA
Background on status of LA Metro Overall Budget and Transit Operating Funds

After the “crash” that began the Great Recession in September of 2008, most transit operators around the nation saw their revenue fall. However, while the Great Recession certainly caused great uncertainty, LA Metro’s overall revenue did not actually fall because they had a new source of revenue: Measure R, approved by voters in November 2008.

Projecting a growing deficit in operations during the Great Recession, Metro approved a fare increase that took effect in 2015.

As a result of Measure R revenue, recovery from the recession, and an adopted fare increase, LA Metro’s overall revenue and bus operating revenue have grown very substantially over the past decade.

- **By FY 2016 Metro’s overall revenue had grown by over 80% since 2008.**

Most of the new funding is for major new rail transit projects, some highway projects, as well Local Return to cities. Still, 25% of Measure R funds are dedicated to transit operations. As a result of Measure R and the 2014 fare increase, Metro’s fiscal situation improved.

- **By FY 2016 Metro bus operating revenue had grown by more than 18% over pre-recession levels.**

Despite these increasing revenues, bus service levels and bus ridership at Metro are both down since 2008.

- After the 2010 bus service restructuring, by 2012 Bus Revenue Service Hours had dropped 12% from pre-recession levels; Bus Service Miles had dropped about 20% by 2012.

- After stabilizing, in 2015 Bus Revenue Service Hours were still down nearly 10% and Bus Service Miles were down over 18% as compared to 2008.

This decline in actual service was not temporary. It had become the new normal.

- This reduction in service is followed by a bus ridership decline of about 6% from 2010 to 2011.

- For the next four years bus ridership stabilized, until 2014 when Metro adopted a fare increase.

- Over the next two years after the fare increase in 2014, bus ridership fell another 11%. Ridership also fell on the Red and Green lines.

- **Taken together, since 2008 after Measure R was approved, bus operating revenue is up 18%, while bus ridership has declined by 15.6%.**

Of course, bus service restructuring and fare increases were decisions made under the duress of the Great Recession when one could not easily have confidence in the fiscal position of the system in the future. Still, a case could be made that in 2015, even prior to Measure M, LA Metro was in a strong fiscal position and could soon seek to restore and increase ridership on the bus system as well as the Red and Green Lines that also had lost riders since 2008.
Along Comes Measure M

In 2016, in order to significantly enhance its rail transit capital program, LA Metro went back to LA County voters and asked their approval of Measure M. Voters said yes by 71.2%.

Again, pre-election polling made clear that voters were principally eager to see traffic congestion relief and were impressed with the success of the new light rail lines Metro had opened in the spring of 2016: the Foothill Gold Line extension to Azusa and the Exposition Light Rail line extension to Santa Monica.

However, Measure M’s commitment to transit operations differed in subtle way from Measure R: while both measures provided for a 5% set aside for rail transit operations, Measure R set aside 20% specifically for Bus Operations while Measure M set aside 20% for Transit Operations, apparently for either or both rail and bus operations or some other transit-type service.

Nevertheless, this 20% will soon add another nearly $160 million per year (and growing) to the resources which Metro could employ to enhance both service and ridership on the Metro countywide bus system. Some share of these Measure M Transit Operation funds will go to municipal bus operators in LA County. Metro’s share will likely be over $100 M per year and growing over time.

....and the unexpected windfall of SB 1

In addition, this year the State Legislature and the Governor approved SB 1, a bill that provides ongoing funding of about $5.2 billion per year for transportation improvements statewide. Of that, about $750 million per year is committed to transit investments to be distributed to transit agencies statewide based upon a population and transit ridership based formula. Half of these transit funds will be for transit capital, half for transit operations.

LA County could receive from SB 1 as much as or more than $175 million per year, some of which will be distributed to the municipal bus operators in the county. Metro itself will likely receive as much as or more than $80 million per year in new transit capital and $80 million per year in new transit operations funding.

Again, even before Measures M and SB 1, LA Metro bus operations would already start the year 2017 in a very strong fiscal position having experienced since 2008 an 18% increase in bus operating revenue.

But now in 2017, beginning July 1, Metro will start to receive an additional $180 million per year (perhaps more) beyond its already strong fiscal position for more investments in transit operations from the combination of Measure M and SB 1.

Promises Made, Promises Kept?

Thus, in 2017 and beyond, Metro has significant new resources (Measure M and SB 1 both have no sunset). These resources will be very much needed to achieve the voter’s most important goal – enhanced transit ridership and reduced traffic congestion.

Voters believe that is what this money will be used for because that is what Metro and the campaign for Measure M told them.
Measure M Preamble and Ballot Statement

The Preamble to Measure M Ordinance calls out the following as specific objectives:

- to improve transportation and ease traffic congestion through the following core goals: Improve freeway traffic flow; reduce bottlenecks and ease traffic congestion.
- Expand the rail and rapid transit system, accelerate rail construction and build new rail lines; enhance local, regional, and express bus service; and improve system connectivity.
- Make public transportation more accessible, convenient, and affordable for seniors, students, and the disabled and provide better mobility options for our aging population.

The ballot language for Measure M that voters saw in their sample ballots expressly says the purpose of Measure M includes:

- keep senior/disabled/student fares affordable
- expand rail/subway/bus systems

Thus, it is quite clear that Metro has the both the mandate and the responsibility to use the additional transit operating resources to grow transit ridership on the bus and rail systems to help relieve traffic congestion. And it is clear it also has the resources.

Now the new challenge: Rebuilding bus and rail ridership

Move LA recommends the following course to rebuild the transit ridership:

1. **Review the bus service restructuring of 2010** to determine whether specific lines should have service levels enhanced or whether any whole lines where service was discontinued should have service restored. Since these lines were reduced or eliminated because they were lower performing lines on Metro’s criteria, it may be that restoration is not the most beneficial approach to enhancing transit ridership – but it should re-assessed. Perhaps in a better fiscal moment like this one, some of the cuts would not have been recommended.

2. **Consider reducing fares to increase transit ridership.** The highest levels of bus ridership in Metro history was in 1985, the result of efforts to reduce traffic congestion during the Olympics. The primary tool employed was to lower bus fares to 50 cents per ride until 1985. It is significant that Metro’s ridership peaked that year.

   After the Olympics, fares went back up to 85 cents and a long term gradual decline in bus ridership began. In fact, every time Metro has increased fares since 1979, there has been a decline in bus ridership. Conversely, whenever Metro has decreased fares (1983, 2004) bus ridership has grown.

3. **Metro could consider a new approach to bus service restructuring,** this time with an eye toward enhancing ridership rather than just saving money. However, we are skeptical of this approach because it seems inherently unpredictable: restructuring can cause unexpected losses in ridership; and, it generally means that some population is likely to lose services it was previously relying upon. The goal should always stay true to the voter’s goals and what Metro told the voters was the purposes of both Measure R and M: enhanced ridership to reduce congestion, not just somebody’s version of efficiency.
4. **Target ridership development program to specific populations**, such as seniors, persons with disabilities, and students. In our view, this is the most promising option for the following reasons.

- These populations have special needs and therefore enhancing ridership will enhance our community’s ability to address those needs.
- In all the polling done prior to both Measures R & M, voters were very favorable and sympathetic to meeting the needs of these populations. Evidence supports the view that favorable votes from seniors and people with disabilities may have been a key to Measure M’s spectacular success.
- Taken together, these populations represent today about 45% of our county population; they will grow to over 50% in a decade. And, these populations tend to include proportionately a larger share of lower income persons than the rest of the population.
  - Seniors: After remaining virtually constant in Los Angeles for 30 years, the senior share of LA County population should be 20% by 2030.
  - Non-senior persons with disabilities are believed to be about 4 - 5% of LA County population
  - College Students in LA County count about 1.4 million, or 14% of our population
- Seniors and persons with disabilities are often on fixed incomes, often with higher medical costs than the rest of the population. Without affordable mobility many will be forced to live very limited lives and are likely to experience declining mental and physical health more quickly.
- The 1.4 million college and secondary student population may represent the largest targetable opportunity for significant ridership growth in near term, since they are naturally mobile and are highly adaptive. Mobilizing them as new riders may require more operating dollars but can be accomplished with little or no capital investment. Metro will likely just be making more effective use of existing capital.
- College students may also be a population that holds great potential for long term transit ridership growth. Community college students in particular can be a very promising population, since such students are more apt than university students to have grown up locally and more likely to continue to live and work locally in LA County in the future.
Specific Recommendations for growing new transit users in LA County

We cannot let the next decade fail to produce enhanced transit ridership the way the last decade has, especially given the new resources voters and the legislature have made available to Metro.

Recommendation 1. Dedicate equivalent of SB 1 Transit Operating Funds (perhaps about $80 million per year) to Innovative Ridership Development

SB 1 provides Metro with completely unanticipated revenue beyond an already robust transit operating revenue provided by Measures R and M. Move LA proposes that the equivalent of the unanticipated transit operating revenues from SB 1, perhaps $80 M/Year, be set aside for use in the development and implementation of innovative strategies to enhance transit services including services for seniors and disabled persons and to build an innovative and effective universal transit pass program among college, university and secondary students in Los Angeles County.

In particular, the Office of Extraordinary Innovation should be asked to play a lead role in developing a Metro model for enhanced transit services for seniors, people with disabilities and students. Metro should bring on consultants with experience in innovative program design to work with the Office of Extraordinary Innovation tasked specifically with developing innovative strategies to grow transit ridership generally, but especially for seniors, people with disabilities and students.

Recommendation 2. Implement Innovations to Expand Ridership among Seniors and People with Disabilities

Move LA proposes that Metro consider implementation of the following program proposals to expand transit opportunities to seniors and disabled persons:

a. Reduce Fares for Transit Pass
   A further reduced fare for a transit pass targeted specifically to low-income senior and disabled persons.

b. Ridesharing for Older Adults and People with Disabilities.
   A pilot project that incorporates ridesharing options (e.g. Transportation Network Companies such as Lyft or micro-transit alternatives) into subsidy and voucher based programs that promote coordinated transportation for low income older adults and people with disabilities. (This could be an augmentation of the mobility-on-demand project with Lyft that has already received federal funding.)

c. Expanding trip planning system.
   The development and utilization of information technology to enhance trip planning by incorporating transportation services offered by public transit agencies, human service agencies and private sources. The aim is to provide current and updated information for all users with specific emphasis on ease of use for older adults and persons with disabilities. This includes establishing an easily accessible multi-modal “find-a-ride” function and maintaining it with up-to-date information.

d. Rider Education and Evaluation
   Expansion of a robust and targeted transportation education program for low income older adults and people with disabilities so that participants can better understand their mobility choices and how to access them. The results of this initiative would be analyzed to understand the effect of transportation education on travel behavior, especially as it relates to age, ethnicity and geography.
e. Enhancing Vehicle Accessibility.
The upgrading of human service agency vehicle fleets to become accessible by persons with disabilities. (This is beyond the 5310, 5316 and 5317 monies.) There should also be a mandate that participating private sector taxi companies and Transportation Network Companies, such as Lyft, must operate accessible vehicles in order to receive a franchise.

f. Increasing Vehicles Serving Older Adults and People with Disabilities
Vehicle replacement and expansion for public transportation and human services agencies to serve older adults and people with disabilities. (This is beyond the 5310, 5316, 5317 monies.)

g. Removing Accessibility Obstacles.
The identification and remediation of impediments beyond ADA requirements — such as failing elevators and escalators — in order to improve physical accessibility around and within transit stations such that older adults and people with disability can more easily utilize transit alternatives.

h. Research on Innovations.
Develop profiles and best practices for improving mobility options for older adults and people with disabilities to identify new pilot projects that can be initiated by Metro.

**Recommendation 3. Implement “Deep Discount” Student Transit Pass Program to Expand Transit Ridership among LA County College and University Students**

Move LA recommends that LA Metro commit to developing a “deep discount” universal student transit pass program that at a minimum attracts 140,000 student riders per weekday onto the transit system, bus or rail.

In Los Angeles County there are as many as 1.4 million college and university students. They are at an important and strategic moment in their lives, learning to create opportunities for themselves, learning to make positive contributions to their families and to their communities.

- Many students in Los Angeles County are from low income households; many work part time as well as attend school and need good affordable transportation options.
- Students are also generally at a lower income period in their adult lives; they are usually cost sensitive, may or may not own a car, and yet are highly mobile, even adventurous. Many college and university students are willing, some even eager, to use transit.
- Transit habits that students learn now can encourage continued future transit use. They are potentially an important part of building a long-term transit culture for the future. Expenditures to attract students on to the system is a good use of marketing dollars.

Our proposed target of 140,000 student transit riders would be:

- equivalent to about 10% of the total college and university student population in LA County and about 20% of the average daily attendance of college and university students and is at the low end of the ridership on such programs implemented between transit operators and colleges or universities around the country.
- The ridership equivalent of the average weekday ridership of the Red Line (146,000) without paying $4.7 B capital cost to build the line or the significant cost to operate it.
- More than a 10% increase in transit ridership in LA County and make up for a significant share of the loss in transit ridership since 2008.
Program Basics

The “deep discount” model is one in which all students pay a small transit fee at a given college as part of their registration fees and all students receive a transit pass, perhaps electronically embedded in their student ID or some other variation on TAP technology, that enables students to board Metro’s transit system at no additional costs. Typically, the college or university pays an equivalent amount as students out of parking or marketing funds, since student transit passes typically lowers on-campus parking needs and costs and makes a campus more competitive when seeking increased enrollment.

All students then have an opportunity to ride the transit system at any time seemingly for free, but actually pre-paid. Some students will ride frequently, some will ride occasionally, but the experience of other college/transit agency collaborations show that total student ridership will likely soar above previous totals.

A Proven Model

Examples of colleges or universities with “deep discount” student transit pass programs include (share of students riding transit to school or “mode split” is highlighted):

**University of Washington, Seattle: U-PASS Program:** Increased the modal share for public transport to 36% in first year of program (2004).

**UC Berkeley (UCB): Student Class Pass Program:** Overall student transit mode share has grown from 5.6% in 1997 to 14% in 2000 to 27% in 2008; student drive-alone share fell from 16% to 7% during the same period.

**University of Wisconsin-Milwaukee, UPASS transit pass program:** Students riding Milwaukee County Transit System (MCTS) increased from 12% prior to UPASS to 26% after.

**Santa Monica College & Big Blue Bus "Any Line, Any Time" program:** Students pay $10.50 per semester & SMC matches it, makes annual payment to BBB. Students with ID get to ride BBB "any line, any time." 2016 survey shows 51% of students now come to college on transit: 37% use their student ID to ride the BBB. In addition, another 13% of SMC students ride Expo to school.

Current Metro Student Pass Efforts

Metro has begun a program to enhance student transit use by making UPasses available for $43 per month to all students enrolled at any college or university in LA County and taking at least 6 units. However, despite Metro staff vigorous efforts, enrollment in the program has reached just 1% of students, far lower than that experienced with the “deep discount” style of programs referenced above.

We believe that this effort is operating under an unreasonable constraint related to the cost recovery assumptions, for example seeking recovery of average costs rather than incremental or marginal costs, and not acknowledging that there are inherent cost risks associated with any major new program or project including building major capital projects like subways or light rail line.

We urge Metro to take a more aspirational approach to the development of a student transit pass program by setting a goal of 140,000 daily student riders and designing a program that can achieve that goal. This is a reasonable percentage of the student population and less than what other colleges and universities have achieved and we have resources to invest in the effort.
### Changes in Metro Budgets, Service Levels, Ridership 2005 - 2016

<table>
<thead>
<tr>
<th></th>
<th>Great Recession</th>
<th>Metro Fare Increase Implemented Sept.'14</th>
<th>Measure M revenue begins</th>
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<td></td>
<td>FY05 FY08 FY09 FY10 FY11 FY12 FY13 FY14 FY15 FY16 FY17</td>
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<tr>
<td><strong>Metro Total Expenditures ($ in millions)</strong></td>
<td>$2.9 B $3.1 B $3.4 B $3.9 B $4.2 B $4.5 B $5.0 B $5.4 B $5.6 B $6.03</td>
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<tr>
<td>% annual change % change since '08</td>
<td>+9.7% +14.7% 0 +7.7% +7.1% +11.1%</td>
<td>+8% +3.7%</td>
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<td><strong>Metro Bus Operating Expenditures</strong></td>
<td>$780.0 $892.2 $903.3 $909.2 $896.9 $906.5 $964 $976.4 $1,019.2 $1,056.6 $1,125.4</td>
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<tr>
<td>% annual change % change since '08</td>
<td>+1.2% +.7% -1.4% +10.7% +3.3%</td>
<td>+4.3% +4.4% +8% +3.1%</td>
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<tr>
<td><strong>Bus Revenue Service Hours (000)</strong></td>
<td>7,567 7,776 7,719 7,600 7,213 6,835 6,856 7,049 7,062 7,006</td>
<td></td>
<td></td>
</tr>
<tr>
<td>% change since '08</td>
<td>-7.2% -12% -11.8% -9.3%</td>
<td>-9.2% -9.9%</td>
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<tr>
<td><strong>Bus Revenue Service Miles (000)</strong></td>
<td>94,436 96,458 97,721 96,254 85,600 77,237 77,471 78,657 78,950 78,671</td>
<td></td>
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</tr>
<tr>
<td>% change since '08</td>
<td>-11.3% -19.9% -19.7% -18.4%</td>
<td>-18.2% -18.4%</td>
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<tr>
<td><strong>Total Annual Metro Bus Boardings Systemwide (000)</strong></td>
<td>380,074 378,840 365,976 357,260 359,980 359,504 361,464 342,750 320,723</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yr to yr Since 2008</td>
<td>-3.7%</td>
<td>-2.4%</td>
<td>-5.2%</td>
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Figures derived from on line Metro budgets and other online Metro docs
Summary of Literature

Increases in Transit Ridership from
Deep Discount Universal Student Transit Pass Programs
(Programs where student transit passes are universal and paid in part by surcharge on student registration fees)

All PROGRAMS BELOW ARE STILL ACTIVE and WELL UTILIZED

University of Washington, Seattle: U-PASS Program
Change in mode choice one year after initiation of U-PASS Program in Seattle

<table>
<thead>
<tr>
<th>Mode Choice</th>
<th>Students</th>
<th>Faculty &amp; Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Before</td>
<td>After</td>
</tr>
<tr>
<td>Auto Drive Alone</td>
<td>25%</td>
<td>14%</td>
</tr>
<tr>
<td>Transit</td>
<td>21%</td>
<td>35%</td>
</tr>
<tr>
<td>All Others (carpool/vanpool, bicycle, walk, &quot;other&quot;)</td>
<td>54%</td>
<td>51%</td>
</tr>
</tbody>
</table>

Source: Williams and P Grealt

Status: Active.
- Students pay $20 per quarter while faculty and staff pay $27.
- Increased the mode share to 35% for public transport during the first year, meaning 35% of students were using public transit to go to school.
- Reduced total vehicle trips by 16%

UC Berkeley (UCB): Student Class Pass Program, 2008

Status: Active. The Class Pass program began as a pilot program in 1998. The Class Pass enables all registered students to ride AC Transit local, Transbay buses and Bear Transit shuttle routes free of charge. The Class Pass is a sticker that is affixed to a student’s UC Berkeley student ID card. The Class Pass is funded by a $69.50 portion of each student’s registration fees each semester.

- Overall student transit mode share has grown to 27% in 2008, meaning 27% of students travel to the university by transit.
- Student drive-alone share fell from 16% to 7% during the same period.

Study in 1997-2000
Universal coverage of all 32,000 enrolled students, unlimited use of all AC Services with no out of pocket charges. Sticker on student ID: 26,000 got the sticker. Student ridership and revenue both increased even though AC Transit made no changes in service and thus did not incur additional costs.

- Net additional revenue was $40,600 per month, more than $406,000 per year, and approximately fifty percent above the pre-Class Pass level.
- Majority of student travel was in midday off-peak: 50% in 1997; 42% in 2000

California State University, Long Beach, U-Pass Program

Case Study: Free, unlimited rides on Long Beach Transit for all students, faculty, staff and campus affiliates. Subsidized transit passes for employees to use on other regional transit providers. At CSU Long Beach annual transit ridership on Long Beach Transit has increased from 98,860 to 1,114,709 since the program’s inception.

A CSULB-funded agreement with Long Beach Transit enables actively enrolled part-time and full-time CSULB students, faculty and staff to ride Long Beach Transit for free.
Participants obtain a TAP card loaded with a CSULB bus pass on it at the CSULB Cashier’s Parking Window. They can also load stored value (“cash”) on the TAP card. This will allow them to also pay fares on other TAP-enabled transit systems without having to pull out physical cash.

**The University of Wisconsin-Milwaukee, UPASS transit pass program**

**Status:** Active. University of Wisconsin-Milwaukee (UWM) with Milwaukee County Transit System.

All UWM students receive an unlimited transit pass as part of their tuition. The pass can be used anytime, anywhere, for any trip purpose throughout Milwaukee County without any additional fare required.

The UPASS program has influenced modal shifts.
- Students riding MCTS increased from 12% mode split prior to UPASS to 26% mode split after.
- Student driving to UWM declined 54% prior to UPASS to between 38% to 41% after

The UPASS program has increased overall transit ridership to UWM.
- MCTS on-board counts show between a 31% and 45% increase in overall transit ridership compared to counts conducted prior to the implementation of the UPASS.
- Survey findings show approximately a 35% increase in ridership.

The UPASS program reduced vehicle trips to the university which resulted in a reduction in emissions, fuel consumption, and resulted in a dollar savings to students.
- The UPASS program resulted in 221,055 fewer vehicle trips to UWM during 1994-95 school year.
- This resulted in a reduction of 5,084,265 VMT for trips to UWM, a savings of 242,108 gallons of fuel, and a savings of $295,371.76 in fuel costs.
- The program also reduced emissions by 20% for trips to UWM.

The UPASS program has increased transit ridership for trips to work, to shopping, and to other locations.
- Transit mode split for work trips by survey respondents showed nearly a doubling over pre-UPASS semesters from a rate of 8% to approximately 15%.

The UPASS program has attracted new riders to transit and increased ridership of regular transit users.
- Approximately 14% of students riding transit to UWM after UPASS were new transit users.
- Approximately 9% to 10% of students using UPASS for work trips were new users.

Freshman students in particular showed high rates of transit usage compared to other students.
- 44% of freshman indicate using UPASS at least one or more times a week for trips to UWM in Fall 1994.
- Nearly 48% indicate using the pass one or more times per week during the Spring 1995.

**Colorado University: College Pass**

- **Status:** Active. In 6 years, student bus riders grew **300,000 to 1,500,000**. Surveys indicate that 42% of these trips would have been by auto. EPA estimated program reduced driving by 3.2 to 6.5 million miles per year preventing 1700 to 3000 metric tons of GHG emissions. In 1997 CU students approved a referendum by 16 to 1 raising semester fees to $19.42

**OTHER STUDENT TRANSIT PASS PROGRAMS BELOW ARE STILL ACTIVE & WELL UTILIZED**

<table>
<thead>
<tr>
<th>University</th>
<th>Year Began</th>
<th>Annual Student Transit Ridership Before</th>
<th>Annual Student Transit Ridership After</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cal State Univ., Sacramento</td>
<td>1992</td>
<td>315,000</td>
<td>537,700</td>
<td>+71%</td>
</tr>
<tr>
<td>Univ. California, Davis</td>
<td>1990</td>
<td>587,000</td>
<td>1,054,000</td>
<td>+79%</td>
</tr>
<tr>
<td>Univ. Wisconsin, Madison</td>
<td>1996</td>
<td>812,000</td>
<td>1,653,000</td>
<td>+104%</td>
</tr>
<tr>
<td>Univ. Illinois, Urbana, Champaign</td>
<td>1989</td>
<td>1,058,000</td>
<td>3,102,000</td>
<td>+193%</td>
</tr>
<tr>
<td>Univ. Colorado, Boulder</td>
<td>1990</td>
<td>300,000</td>
<td>900,000</td>
<td>+200%</td>
</tr>
</tbody>
</table>

Source: Brown, Hess and Shoup, 1999

Average cost of these programs: $32 per student per year.
Hello,

On behalf of the Los Angeles County Department of Public Health please find our comments on the draft Measure M Guidelines attached. We look forward to continuing to work with Metro on improving the quality of life of our region.

Thank you for your time and consideration.

Sincerely,

Alexis Lantz

Policy Analyst
PLACE Program
(Policies for Livable Active Communities and Environments)

LA County Dept. of Public Health
695 S. Vermont (14th Floor - south tower)
LA, CA 90005
213.738.4085 (ph)
213.637.4879 (fax)

website: www.publichealth.lacounty.gov/place
May 25, 2017

Phillip Washington, Chief Executive Officer
Metro
1 Gateway Plaza
Los Angeles, CA 90012

MEASURE M DRAFT GUIDELINES

Dear Mr. Washington:

Thank you for this opportunity to comment on the Measure M Draft Guidelines. Measure M represents a great accomplishment by Metro staff and leadership. It is a testament to both the confidence of Los Angeles County voters in Metro as well as the demand for greater mobility options across the region. With this new source of funding comes an incredible opportunity for Metro to improve both regional mobility as well as the health and safety of our communities, especially Metro’s core constituents, low income bus and rail riders. To that end, our comments are focused on ways Metro can enhance opportunities to improve roadway safety across the county, advance equity, and maximize implementation of adopted Metro plans and policies.

OPPORTUNITY TO IMPROVE ROADWAY SAFETY

Motor vehicle crashes are a serious public health problem in Los Angeles County. Currently, motor vehicle crashes are the leading cause of death for children five to 14 years old and the second leading cause of death for people 44 years old and younger. More than 600 people lose their lives in traffic collisions each year in Los Angeles County. Unfortunately, the problem is getting worse; in 2016, the City of Los Angeles saw an increase in traffic deaths of almost 43 percent over the previous year. Low income communities of color are often hardest hit by this crisis. For example, in the City of Los Angeles a disproportionate percentage of serious and fatal collisions take place in Central and South Los Angeles, where people are more likely to walk, bike or take transit as their primary mode of transportation. In addition to the tragic human costs, the economic cost of fatalities and severe injuries in Los Angeles County is estimated at 1.3 billion dollars.\(^\text{ii}\)
In 2015 DPH finalized our Community Health Improvement Plan (CHIP), which established a goal of working with partners to reduce fatalities and severe injuries from motor vehicle collisions by 20% by 2020. To achieve this goal, we are working closely with the City and County of Los Angeles on Vision Zero initiatives to improve traffic safety. The Measure M guidelines present the ideal opportunity for Metro to play a leadership role in improving roadway safety across the county.

We strongly encourage Metro to establish improved roadway safety as the primary objective of the Measure M Multi-Year Subregional Programs (MSP). The MSP includes diverse projects identified by the sub-regions, through the Mobility Matrix process in 2015, and represents $10 billion in total expenditure. It funds a diversity of projects that provide sub-regional benefits. Whether a project’s primary purpose is to improve goods movement, signal synchronization or a new bikeway, it should be engineered to improve safety for all users, especially the most vulnerable roadway users, pedestrians.

One approach would be to require that all MSP projects are consistent with regional Complete Street goals. Metro could also establish a traffic collision reduction performance measure and provide regular updates in Metro’s Quality of Life Report on whether Measure M projects are helping to reduce traffic collisions countywide. This would require allowing data collection and evaluation activities as eligible project expenses to track the impact of projects after construction.

OPPORTUNITY FOR INCREASED COMMUNITY ENGAGEMENT

Many MSP projects are loosely defined. Furthermore, in many low-income cities, little if any project planning has been completed. To ensure that MSP projects are shovel ready and are in line with regional goals, we recommend that the Measure M guidelines allow the funding of planning and programming studies as an eligible expense. This will ensure cities are ready to take advantage of Measure M funding and that projects achieve local and regional goals.

Community outreach and engagement are critical elements of successful planning and project implementation and help ensure broad support. In low-income communities however, stakeholders have often been left out of the transportation planning process. Therefore, we recommend that funding for outreach and engagement is included as part of planning and programming studies and is continued throughout the project lifespan.

Furthermore, we recommend that Metro take the time to develop an outreach guidance tool for MSP projects to ensure effective engagement of community members, with special attention on engaging low-income communities and communities of color. Metro should convene an advisory committee of community-based organizations with experience serving low-income communities and communities of color to assist in developing this outreach guidance.

OPPORTUNITY TO MITIGATE CLIMATE CHANGE

Measure M can also help address health concerns related to climate change. UCLA’s Institute of the Environment and Sustainability has projected a three to five degree Fahrenheit increase across Southern California over the next 30 years. They have also projected that heat waves will be more frequent and longer lasting. Higher temperatures impact public health by increasing
the incidence of heat exhaustion and heat stroke and by exacerbating existing medical conditions such as asthma and heart conditions. Communities likely to be most impacted by the rise in temperatures are those with the least amount of urban tree canopy and park space, which are primarily low-income communities of color.

Measure M offers an opportunity to ensure all new transportation projects contribute to reducing the rising-temperatures associated with the urban heat island effect. Currently, in the MSP section of the guidelines, “beautification” elements – presumably tree planting and greenery – are not eligible for funding. However, trees and other urban greening are a critical strategy for mitigating the urban heat island effect as well as addressing storm water runoff issues. Therefore, we recommend Metro update the eligibility language to allow ‘climate mitigation improvements.’ Climate mitigation improvements can be defined as tree and other plantings that reduce the urban heat island effect as well as use of materials and innovations that may reduce reflectivity of paved surfaces and/or provide increased shade along transportation improvements.

Integrating new trees and plants into the design and construction phases of a transportation project is important because it increases the likelihood that urban greening will be implemented in the near term. This upfront approach to urban greening also saves money. It reduces the potential for deconstructing a recently completed project and reduces impacts to businesses or households in the project area as all plantings and related water or runoff infrastructure are done during the construction of the transportation project.

We commend Metro staff for their work in developing the guidelines. We hope our comments will help strengthen the guidelines and ensure the Los Angeles County region not only builds the ‘transportation system of today, tomorrow and beyond,’ but improves the quality of life and health of our region while doing so. Thank you for the opportunity to provide these comments. We look forward to continuing to work with Metro.

Sincerely,

Barbara Ferrer, Ph.D., M.P.H., M.Ed.
Director

BF:jb

\[2\] California Department of Transportation. California Strategic Highway Safety Plan 2015 - 2019
\[3\] https://www.ioes.ucla.edu/project/climate-change-in-the-los-angeles-region/
Good afternoon,

On behalf of Community Health Councils, please find the attached comments on the draft Measure M Guidelines. Please do not hesitate to contact me if you have any questions.

Thank you,
Jackie

Jacqueline Illum, MPL
Senior Policy Analyst
Community Health Councils
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Los Angeles, CA 90008
323-295-9372 x252 • jillum@ chc-inc.org • www.chc-inc.org
May 24, 2017

Mr. Phillip A. Washington
Chief Executive Officer
Metro
One Gateway Plaza
Los Angeles, CA 90012

Re: Comments on Draft Measure M Guidelines

Dear Mr. Washington,

Community Health Councils (CHC) respectfully writes to provide comments on draft Measure M Guidelines. These guidelines mark a key step toward the implementation of Measure M’s promise to provide Los Angeles County residents with access to a safe, reliable, affordable, and sustainable transportation system. For nearly 25 year, CHC has been at the forefront of work to eliminate health disparities by promoting social justice and achieving equity in community and environmental resources to improve the health and well-being of underserved populations. Our dynamic network of coalitions is composed of neighborhood leaders, consumer advocates, healthcare and social service providers, and educational and faith-based organizations serving communities in South Los Angeles. These stakeholders recognize the impact the built environment can have on the health of individuals and communities, and identify Measure M Guidelines as a powerful mechanism to ensure equitable transit development throughout Los Angeles County. It is with this experience that comments in this letter are provided.

We believe that investments in the transportation system should support safe, healthy, and equitable communities, however transportation decisions in Los Angeles County have not always uplifted these goals. In many cases we have seen auto-centric transportation projects that have physically divided and destroyed communities and increased environmental racism through pollution and unsafe streets. Transportation investment decisions also have often not prioritized low-income communities of color who are the most transit-dependent in our city.1 We are proud of the increasing focus on equity in Los Angeles in recent years, with tremendous progress on supportive policy for complete streets, first and last mile access, and green infrastructure. Our support for Measure M was predicated on the notion that additional funding would help implement new policies that increase mobility and promote safety and transit equity, while understanding that many of the implementation details would need to be worked out in the guidelines.

Indeed, it is the guidelines that describe the exact mechanisms by which general policies are applied to each project and program, including fundamental aspects like what criteria are used to select projects for funding, who makes those decisions, and how stakeholders are engaged throughout the process. Detailing these processes and prioritizing equity in the planning process by focusing on community engagement, prioritizing low-income communities of color, and using data to inform decisions, are crucial for ensuring that Measure M can successfully transform Los Angeles for all its residents. Based on our research and discussions with partners, we offer the following specific recommendations for improving the draft guidelines.
Recommendations
Many members of the South LA community were hesitantly supportive or outright opposed Measure M, viewing it as another regressive tax that would only serve choice riders rather than focusing on transit dependent communities. Overall, Measure M Guidelines should strive for a clear focus on social equity as a priority in all decision making, and the guidelines could be strengthened by providing additional details and transparency, as there is currently a lack of clarity around many of the guidelines. By establishing clear, detailed, and specific guidelines upfront, Measure M Guidelines have the potential to transform the region’s transportation system into the world-class transportation system we want and deserve.

1. **Safety:** The Measure M campaign assured voters that funds would go toward growing a comprehensive transportation system in Los Angeles inclusive of transit riders, drivers, pedestrians, and cyclists. Metro’s Complete Streets Policy is the primary mechanism for implementing this vision, yet the draft guidelines are vague about its applicability to some programs. The **final guidelines should clarify that Metro’s Complete Streets Policy applies to all funding programs, including multiyear sub-regional programs, and define Metro’s oversight role to ensure compliance.**

2. **Comprehensive Transportation System:** To truly transform our transportation system, Measure M needs to establish a comprehensive vision for all Angelenos with diverse mobility options; hence, solely funding capital projects will leave us with a fragmented system. As such, the **guidelines should support broad eligibility for non-capital projects such as programs that support behavior change, planning, project development, and data collection.** Relative to capital projects, these inexpensive programmatic investments will have a high return on investment as they will increase the effectiveness and utilization of the new infrastructure.

3. **Social Equity:** While we appreciate that Measure M included flexibility in some of its funding programs and projects, many of these funding programs lack clarity and definition on project selection criteria. The **final guidelines should avoid distributing funding to any program on a “first come, first served” basis.** Many of the most needed projects are in communities that do not have the capacity to jump to the front of the line; however the inclusion of authentic community engagement and a data-driven prioritization process can ensure that the most effective projects are identified.

4. **Equitable Resource Allocation:** The role of Measure M Guidelines is to help allocate resources to projects that address the diverse needs of County residents, and in order to successfully complete that task, policies should be developed based on common values and defined objectives. We cannot consider ourselves a world-class region if we do not have an equitable transportation system that takes low income communities of color into consideration and this will not happen in the absence of an equity policy that clearly defines these communities and their mobility needs. The **final guidelines should include a concrete transit equity policy in the Long Range Transportation Plan (LRTP) and include mechanisms to advance equity in the implementation of Measure M programs, such as prioritization and/or set-asides in funding programs.**

5. **Highway Programs:** The Highway Programs represent a significant portion of Measure M expenditures, yet they lack clear, multimodal objectives for evaluating project effectiveness. Performance measurement for highways is a quickly evolving field and the guidelines should reflect this evolution by incorporating the latest research. For example, highway metrics should take into account induced demand when calculating the anticipated benefits of a highway project. The **final guidelines should be clear about what these programs aim to achieve and define objectives that reflect current planning practice.** Safety should be the primary priority in all Measure M funded highway programs.
- Traffic collisions kill over 500 people each year in Los Angeles County and are the leading cause of death for children ages 2 to 14. These collisions happen on freeways, urban arterials, and local streets, all of which are considered "highways" by Measure M.

- South LA is overwhelmingly over-represented in the city’s High Injury Network (HIN) of traffic deaths and severe injuries. In addition to the catastrophic toll this traffic violence takes on our families and communities, collisions are a leading source of traffic delays that reduce the efficiency of our roads. Addressing chronic safety issues on our streets and highways will save lives and ease congestion, a clear win-win. Currently, the highway program objectives lack a clear focus on safety, particularly for vulnerable road users. The final guidelines should make safety the first objective for all highway programs, with particular emphasis on people walking and biking. All sub-regional highway programs should be required to evaluate fatal and serious injury collision hotspots within their program area (i.e. High Injury Network) and include safety countermeasures in projects within those areas.

6. **Countywide Active Transportation Program**: Only 2% of Measure M funds have been allocated for pedestrian and bicyclist projects, but this grossly undervalues the high need for funding in these areas. As such, projects and programs must be prioritized based on their ability to have the greatest impact on communities. Along with our partners at Invest in Place, we support developing more detailed guidelines over the next year to maximize the benefits of this program. Knowing that walking and biking for transportation are particularly prevalent in low-income communities and communities of color, we believe this extra year for guidelines development will also provide an opportunity to integrate social equity metrics into this program.

- While it is important for some of this funding to support promising local projects and programs, Metro can and should first allocate stable funding for its own ongoing countywide program needs, including open streets, bike share operations, bike safety education, and safe routes to school non-infrastructure programs. Next, Metro should target assistance to planning and project development in disadvantaged communities to help level the playing field in terms of resources for active transportation as well as to increase the region’s competitiveness for state and federal funding programs. Finally, Metro should focus its limited resources on supporting innovative pilot projects that can advance the state of the practice for active transportation projects and programs in Los Angeles County.

7. **Local Return**: There are two primary concerns with the Local Return guidelines: 1) affordable housing in Transit-Oriented Communities, and 2) funding allocations.

- **Affordable Housing Near Transit**: We commend Metro on their transition to the use of the term Transit-Oriented Communities (TOC) rather than the more traditional term of Transit-Oriented Development, however, the draft guidelines lack clarity on how TOC is defined. It is encouraging to see public agencies acknowledge that transit-supportive land use is more about the built environment that makes up a whole neighborhood rather than any single development project. CHC supports this holistic approach to development, but we believe the Guidelines should include strong policies to prioritize equity through Local Return in Transit-Oriented Communities, which includes preserving existing affordable housing, as well as developing more high quality affordable housing. As of the writing of this letter, Los Angeles County has a demand for more than 500,000 affordable housing units. We see TOCs as part
of the solution to our affordability crisis. Local return investments should build off the work Metro is already doing to encourage both the production and preservation of accessible, equitable transit-oriented communities, such as Metro’s Joint Development affordable housing policies and the Metro Affordable Transit Connected Housing Program.

- **Local Funding Allocations:** Measure M clearly stipulates that Local Return funding should be allocated according to population. In various discussions leading up to the Measure M Ordinance, alternative formulas were considered and dismissed as less equitable. For example, formulas based on road miles or land area would favor sprawling jurisdictions over those with more efficient land use and transportation patterns. Sales tax receipts-based or employment-based formulas would favor those jurisdictions that have overbuilt office and retail and underbuilt housing supply in the midst of a historic regional housing shortage. Despite the consideration and rejection of alternative formulas, the draft Measure M Guidelines include a proposal for a minimum allocation of $100,000 per year to eight jurisdictions that would otherwise receive less funding from the per-capita formula. This extra funding would come from proportionally reducing allocations to all other 81 local jurisdictions. The eight jurisdictions that would benefit from the Local Return floor fall into two categories: they are either small, exclusive suburbs born out of a history of residential segregation or industrial tax havens that have intentionally excluded residents to avoid accountability for environmental justice impacts from heavy industry. Meanwhile, the donor cities would include densely populated, low-income communities like Bell, Cudahy, and Lawndale. Adjusting the Local Return floor higher or lower than $100,000 would change the list of which cities benefit and which ones are impacted, but it wouldn’t change the fundamental calculation that the cities that benefit the most from any Local Return floor are those with a history of exclusion and/or environmental injustice. For this reason, CHC strongly opposes any Local Return floor.

Again, we congratulate Metro on reaching this important milestone. We appreciate your diligent consideration of these recommendations and continued engagement with diverse stakeholder groups through the Policy Advisory Council. If you have any questions, please contact Sonya Vasquez, Chief Program Officer at svasquez@chc-inc.or or (213) 295-9372.

Sincerely,

Veronica Flores, MA
Chief Executive Officer

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Metro Team at theplan.metro.net,

The North County Transportation Coalition (NCTC) submits the attached letter as comments regarding the Measure M Draft Guidelines.

Thanks,

--
Brian Kuhn, P.E.
NCTC Secretary
Senior Civil Engineer
City of Palmdale – Public Works
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Attachments:
May 25, 2017

Mr. Philip A. Washington
Chief Executive Officer
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-7952

Submitted Via theplan.metro.net

RE: Measure M Draft Guidelines

Dear Mr. Washington,

The North County Transportation Coalition (NCTC) submits the following comments regarding the draft Measure M Guidelines.

As a participating member in the Local Return Guidelines working group, the North County has consistently indicated that there should not be an "off the top" minimum funding floor for local return. Any minimum funding floor for low population cities should be handled at the subregional level, with cities supporting others within their subregion or COG. Prior to the voters approving Measure M, Metro issued fact sheets that were simple guides to what subregions could expect from the new measure. Those documents are still available on Metro's website. Metro should avoid changing the simple population distribution method of local return distribution to avoid potential "bait-and-switch" concerns. The NCTC believes residential population based on the location of residence is what was advertised in the lead up to Measure M's approval and what is supported by the ordinance language.

Project readiness is a critical factor in accessing funding under Measure M. The NCTC believes these guidelines should more adequately define project readiness for each phase of a project. In particular, the Multiyear Subregional Programs should have additional flexibility to ensure subregions can accomplish the various pre-construction phases including
environmental review, project design, and right-of-way acquisition with Measure M funds.

Countywide BRT Expansion should not be limited to Metro projects only. As a countywide program, this program should be open to funding projects in areas of the county not currently served by Metro bus or train service.

Similar to Measure R, the Measure M guidelines should include some protection for funds within a subregion and for transfers between transit and highway subfunds. Due to the subregional equity intended to be built into the measure, it is important that funds assigned to a subregion stay within that subregion when reassigned to other projects.

The "Arterial Street Improvements" multiyear subregional program for the North County, defined on Page 29 of the guidelines, should be adjusted to allow intersection treatments such as traffic signals and roundabouts. This subregional program should also include the ability to integrate complete streets concepts into arterial projects.

Several programs lack sufficient definition to ensure subregions will be adequately able to compete for funds. For example, the active transportation 2% funds identified on page 41 of the guidelines does not clearly indicate that funds will be available to all jurisdictions for bikeshare programs. In addition, more definition is needed in the Subregional Equity Program outlined on pages 52 and 53 of the draft document. This section currently doesn't include any guidance on eligible project types or how the funding will be accessed by the local jurisdictions.

We look forward to continuing to address these issues as we move forward with Measure M.

Sincerely,

[Signature]

James C. Ledford Jr.
NCTC Chair

BK:bk

C: NCTC Membership
Hello,

Please see the attached comment letter on the draft Measure M Guidelines from the Safe Routes to School National Partnership.

Thank you,

Andrew

--

Andrew Pasillas
Regional Policy Manager
Safe Routes to School National Partnership

562/857-7590
andrew@saferoutespartnership.org
Los Angeles, California

National: Website / Facebook / Twitter
California: Website / Facebook / Twitter
May 26, 2017

Mr. Phillip A. Washington
Metro
One Gateway Plaza
Los Angeles, CA 90012

RE: Comments on Draft Measure M Guidelines

Dear Mr. Washington,

The Safe Routes to School National Partnership thanks Metro for the opportunity to provide comments on the draft Measure M Guidelines. The draft Guidelines offer a promising start toward implementation of the bold vision promised by Measure M. We are sending this comment letter to emphasize a few points that we believe are critical to the ultimate outcomes and success of Measure M investments for our region.

Overall Recommendations

The formation of the Policy Advisory Council is a big step forward in engagement and demonstrates need for continued collaboration. The diversity of the Advisory Council is reflective of the many perspectives and challenges that exist in addressing transportation policy across Los Angeles County. We have found that having a structure open to the public to gather and filter these interests has proven useful in our own efforts to stay up to date on relevant discussions. Metro should continue to think creatively about the role of the Advisory Council and public participation in shaping its policy.

All projects and programs funded with Measure M funds must prioritize pedestrian and bicycle safety. Across Los Angeles County, traffic collisions kill over 500 people a year and are the leading cause of death for children ages 2 to 14. The City of Los Angeles has made a strong commitment fulfilling its Vision Zero strategy, while the County of Los Angeles is currently developing its own Vision Zero policy. The Guidelines should support these efforts, and future Vision Zero policies pursued by jurisdictions throughout Los Angeles County, by ensuring safety is a primary objective of all projects and programs funded by Measure M. In particular, the Guidelines should make safety and protecting vulnerable road users the first objective for all Highway Programs.

Expand eligibility to include funding for planning, community participation, and non-capital activities. The Guidelines should clarify eligibility for a range of programmatic and non-infrastructure solutions that are cost-effective and often equally as impactful as capital
projects. It is also crucial that planning and development processes be eligible for funding to ensure that strategic and context-sensitive transportation solutions are prioritized to advance the region as a whole, especially within high-need areas.

Prioritize current Metro policy objectives that support strategic and equitable investments and do not rely on project readiness. Distributing funding on a “first come, first served” basis is neither strategic nor equitable and thus will not serve the county well. Using project readiness as a screen will disadvantage communities without the funding and staffing to plan and advance projects. Projects should be selected based on the project quality, ability to address inequity, and the impact on objectives such as safety, connectivity, and input received via thorough community engagement. Clear oversight responsibility for project selection should be established.

Clarify that Metro’s Complete Streets Policy applies to all funding programs. Metro’s Complete Streets Policy is a primary tool for ensuring that programs will create a balanced transportation system that serves all road users, particularly those who are vulnerable. The Guidelines should define Metro’s role to ensure compliance with the policy.

Active Transportation Program

Expand eligibility in the Active Transportation Program to explicitly include investments in programmatic and non-infrastructure activities, such as safe routes to school. Metro recently completed a robust Safe Routes to School Pilot Program to initiate and help sustain safe routes to school programs at ten schools across Los Angeles County. Specifically, the Pilot Program was a non-infrastructure program consisting of education, encouragement, enforcement, evaluation activities, equity considerations, and the development of travel plans. A significant outcome of the Pilot Program was the development of the Countywide Safe Routes to School Resource Manual—a comprehensive guidance tool that Metro designed to expand non-infrastructure safe routes to school programs across the County. The Guidelines should reflect Metro’s prioritization and investment into these crucial programmatic activities by ensuring that Measure M can support both infrastructure investments and non-infrastructure programs, particularly in disadvantaged communities. Research has demonstrated that Safe Routes to School initiatives that pair infrastructure with non-infrastructure programming are more effective over the long-term.

Set aside money within the Countywide Active Transportation Program for ongoing Metro program needs, including safe routes to school non-infrastructure programs. While the 2% dedicated local funding for walking and biking through Measure M is a significant milestone, the amount falls well short of the need, especially in underserved communities. This funding should also prioritize providing technical assistance in planning
and project development in disadvantaged communities to benefit areas of the County that lack resources for active transportation. This approach will holistically benefit Los Angeles County and improve the region’s competitiveness for state and federal funding programs.

Local Return

Eliminate the $100,000 Local Return floor proposal, in addition to other floor proposals. As proposed, this strategy re-allocates funds away from lower-income, high-need areas to high-income communities that have a history of exclusion and environmental injustice. This approach sends the wrong message in terms of how Metro values high-need areas and prioritizes investment outcomes that are equitable. Furthermore, the Guidelines should clearly articulate definitions for any use of terms like “fair” or “equitable” that are not based on advancing social equity, safety, or other policy objectives.

We appreciate the opportunity to work with the Policy Advisory Council, along with Metro staff and leadership to provide comments on the draft Measure M Guidelines. We look forward to utilizing the Advisory Council as future development for certain Measure M Guideline components and the Long Range Transportation Plan takes shape. If you have questions or concerns please feel free to reach out to Andrew Pasillas, at andrew@saferoutespartnership.org or by phone 562-857-7590.

Respectfully submitted,

Andrew Pasillas, Southern California Regional Policy Manager
Safe Routes to School National Partnership
Dear Metro Staff and Board of Directors,

Thank you for the opportunity to provide public review of the Draft Measure M Guidelines. Please find attached LACBC's comment letter.

Best regards,

--

Lyndsey Q. Nolan
Policy & Outreach Coordinator
Los Angeles County Bicycle Coalition

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Help make L.A. County a healthy, safe, and fun place to ride a bike: Become an LACBC member today!
May 23, 2017

Metro Staff and Board of Directors
1 Gateway Plaza
Los Angeles, CA 90012
Submitted via: theplan@metro.net

RE: Comments on Measure M Draft Guidelines

Dear Metro staff and directors,

The Los Angeles County Bicycle Coalition (LACBC) works to make all communities in Los Angeles County healthy, safe, and fun places to bike and walk. LACBC thanks Metro staff and directors for the opportunity to provide feedback on the draft Measure M guidelines and congratulates Metro on this extraordinary milestone toward implementation.

The passage of Measure M presents an unparalleled opportunity to build not only a world-class transportation system, but also is an opportunity to ensure transportation justice as investments are being made in communities throughout Los Angeles County. LACBC believes that building a healthy, equitable, safe, accessible, reliable, affordable, and sustainable transportation system means respecting the needs and dignity of all residents and communities. It also means rebuilding trust between powerful public agencies and low-income communities of color that have historically been disinvested in and have been paying the price with their health, economic stability, and well being for decades. To ensure the effective and equitable implementation of Measure M, LACBC urges Metro to include the following recommendations in the guidelines:

1. Use an accurate and comprehensive definition of equity and incorporate equity metrics to identify, select, and prioritize projects. Using “equity” to describe the provision of equivalent funding to each subregion, as it is used in the existing language of the guidelines, is inaccurate and misleading. Equity and geographic equality are not one in the same. Equity matters because every community has different starting points and trajectories due to racism and systemic oppression. Typically, groups that experience inequities - such as low income people, people of color, undocumented people, LGBT and gender nonconforming people, people with disabilities, and women - also historically lack political, social, or economic power. In the transportation context, equity ensures that regardless of race or income, people have access to and are provided the same quality of infrastructure investments as others who are not in a marginalized community. The guidelines should require that cities first use funds to
identify high collisions corridors. They should then explicitly prioritize projects on high collision corridors in communities that have been historically neglected by infrastructure investment and transportation planning; often low-income communities and communities of color that are transit dependent. These areas can be identified through a set of equity metrics which include: mapping of high collision corridors, low-income population, race/ethnicity, and concentrations of people with no car ownership.

2. **Preserve and expand equitable Transit Oriented Communities (TOCs) by ensuring anti-displacement measures are coupled with transportation investments within the same neighborhood.** The guidelines for TOC local return funding should have equity and affordability as an explicit goal and expand potential TOC investments to include the preservation of existing affordable housing near transit. Affordable housing preservation strategies are critical to ensuring existing transit-dependent residents can remain in TOCs. Local return investments should build off the work Metro is already doing to encourage both the production and preservation of accessible, equitable transit-oriented communities, such as Metro’s Joint Development affordable housing policies and the Metro Affordable Transit Connected Housing Program. Priority TOC areas can be identified by a low median household income, high percentage of renter households, potential for market strength change, and vulnerability of existing housing stock. Specifically, in the City of Los Angeles, we are calling for at least 10% of local return funding to capitalize a City of LA-specific equitable TOC preservation fund so that mission-driven organizations can acquire and preserve at-risk affordable units in TOC areas that are particularly vulnerable to displacement pressures.

3. **Provide further guidance on how cities may use multi-benefit Local Return investments, establish performance metric tracking, and require annual audits.** Make sure that all local jurisdictions have sufficient access to information regarding recommended practices for making streets green and complete. Provide tools that help jurisdictions identify opportunities for multi-benefit investments, and establish a performance metric tracking system to help them monitor their progress across several indicator areas, such as urban heat and quality of pedestrian and bicycle infrastructure. Performance metric tracking will give Metro-area projects an advantage when applying for State or Federal funds, and could drive progress by tying improvement to incentives within Metro’s own competitive funding programs. Establishing an annual audit that follows budget season will help ensure guidelines are being implemented correctly.

4. **Develop more detailed guidelines over the next year to maximize the benefits of the Countywide Active Transportation Program.** Measure M includes the first dedicated local funding source for walking and biking, though at only 2% of the measure, this funding falls far short of the identified need. That makes it critical that this limited funding is prioritized for the projects and programs that will have the greatest benefits.
Since walking and biking are particularly prevalent in low-income communities and communities of color, we believe this extra year for guidelines development will also provide an opportunity to integrate social equity metrics into this program.

5. **Implement performance criteria for Highway subfunds, make harmful expenditures ineligible, and allow that funds be used for planning active transportation corridors.** All projects funded by Measure M should align with State climate goals, help achieve vehicle miles traveled reduction targets, reduce burdens on disadvantaged communities, and improve safety especially for the most vulnerable road users. “Project readiness” should be defined as meeting certain performance criteria within these objective categories. If funding pre-construction activities, Metro should place a cap on the percent of project costs for those activities, as a way to discourage harmful highway projects from using up resources that could otherwise be spent enhancing communities.

6. **Expand green infrastructure definition to cooling benefits, do not exclude “beautification” from eligibility, and require multi-benefits.** Many green infrastructure improvements provide beautification co-benefits, stormwater management benefits, cooling, and shade. As extreme heat days are on the rise, we must combat the urban heat island effect on our streets, improve public health, and make active transportation more appealing to Angelenos. This is especially important for transit-dependent low-income communities with disproportionately less greening elements in their communities. These elements should be multi-benefit, delivering not only environmental results, but also enhancing the community experience of that space.

7. **Include recreational transit eligibility in all operations subfunds.** This includes transit service to parks and open space, which are otherwise inaccessible to transit-dependent households, resulting in significant disparities in public health outcomes. Currently, recreational transit is only named as an eligible expense in the Local Return section; however, other subfunds that support transit service expansion should also explicitly allow recreational transit service.

8. **Orient competitive funding programs to meet critical needs and leverage multi-benefit investments.** Already at this stage, establish guiding principles for the competitive funding programs that are to undergo forthcoming detailed guideline development. Namely, require that performance criteria be developed so that funded projects meet clearly identified objectives such as: network connectivity, multi-modal mobility, sustainability, safety, equity, and community engagement. It is also crucial that Metro provide technical assistance to DACs so that communities most in need of transportation investments have a good chance at applying for those competitive funds.

9. **All subregions should conduct a transparent process for prioritizing additional funding from the Subregional Equity Program with robust public participation.** The Subregional Equity Program is equivalent to nearly $1.2 billion across eight subregions,
yet the program has no objectives, no eligibility or selection criteria, and no timeline for implementation. While the draft guidelines say that additional evaluation criteria will be developed within a year, in the interim, projects will be funded on a first come, first served basis. First come, first served is not a strategic method for allocating transportation funding. Before allocating any Subregional Equity Program funding, Metro should work with each subregion to identify which projects and programs are priorities.

10. Metro should consider a one year extension to develop specific guidelines for the Multiyear Subregional Programs; the final guidelines should remove any explicit references to the Mobility Matrices for determining eligibility or priority within funding programs. The Multiyear Subregional Programs were created because many investments fall between major regional capital projects and purely local projects. These programs’ flexibility present a risk for accountability since they essentially must be built from scratch in order to develop administrative processes that are transparent, performance-driven, accountable, and assign the appropriate level of authority to the appropriate decision-makers. In addition, the Mobility Matrices developed by Metro and each subregion did not incorporate an exhaustive evaluation of mobility needs. Instead, it relied heavily on prior planning studies, some of which were decades old. Jurisdictions without existing plans, particularly low-income cities, were not able to participate fully. As a result, the Mobility Matrices generally underreported needs for active transportation projects, didn’t include complete streets elements in project costs, and overlooked many needs in low-income communities and communities of color.

As Metro continues refining the Measure M guidelines, LACBC encourages you to be bold in estimating the potential you have to transform our transportation landscape into a greener, healthier, more equitable one. We also urge you to use caution and prevent Measure M funds from being expended in ways that would exacerbate environmental harms and hurt low-income communities and communities of color. We thank you for your consideration and would love to serve as a resource to your staff. If you have any questions, please feel free to give us a call.

Sincerely,

Tamika L. Butler
Executive Director
Dear Mr. Washington and Metro Staff,

Attached you will find ACT-LA's comment letter regarding Measure M Guidelines.

Thank you,

Asiyahola Sankara  
Alliance for Community Transit - Los Angeles (ACT-LA)

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Asiyahola Sankara  
Organizing and Outreach Program Manager | Alliance for Community Transit - Los Angeles  
(213) 745-9961 ext: 203  
www.allianceforcommunitytransit.org
May 26, 2017

Mr. Phillip A. Washington  
Chief Executive Officer  
Metro  
One Gateway Plaza  
Los Angeles, CA 90012  
Submitted via: theplan@metro.net

RE: Comments on Draft Measure M Guidelines

Dear Mr. Washington,

The Alliance for Community Transit-Los Angeles (ACT-LA) is a citywide coalition of 34 organizations representing thousands of community residents. Our vision is a transit-rich Los Angeles where all people have access to quality jobs, affordable housing, necessary social services, ample transportation options, and a voice in decision-making.

The passage of Measure M in November 2016 presents a historic opportunity to invest in our transportation infrastructure to transform L.A. into a sustainable, healthier city. As voters were deliberating Measure M before this November’s election, there was substantial discussion regarding the threat of displacement of low-income communities of color near planned transit stations. Our coalition, along with others, urges Metro to commit to solutions for the City’s renter majority during this massive transit expansion in the country’s most unaffordable rental market.

1. Preserve and expand equitable Transit Oriented Communities (TOC).

While much needs to be done to address the severe housing instability in the region, one immediate opportunity exists via Measure M revenue. We applaud the inclusion of funding Transit Oriented Communities under the Draft Guidelines’ local return expenditures as well as, in the City of LA, Mayor Eric Garcetti’s Executive Directive No. 19, which mentions using revenue from Measure M for affordable housing. This is a significant opportunity to invest in strategies to stabilize transit-oriented communities that are made up of hard-working Angelenos who may be dependent on living near public transit but are struggling with rising rents and stagnant incomes.

However, the Guidelines for TOC local return funding should 1) have equity and affordability as an explicit goal and 2) expand potential Transit Oriented Community (TOC) investments to include the preservation of existing affordable housing near transit. Affordable housing preservation strategies are critical to ensuring existing transit dependent residents can remain in TOCs and will likely be able to reach more units and residents than a production strategy with
the same funding level could. Local return investments can build off the work Metro is already doing to encourage both the production and preservation of accessible, equitable transit-oriented communities, such as the Metro Affordable Transit Connected Housing Program (MATCH).

Specifically, in the City of Los Angeles, we are calling for 10% of local return funding to capitalize a City of LA-specific equitable TOC preservation fund so that mission-driven organizations can acquire and preserve at-risk affordable units in TOC areas that are particularly vulnerable to displacement pressures. Priority TOC areas can be identified by a low median household income and high percentage of renter households as well as potential for market strength change (such as new transit or development in the area) and vulnerability of existing housing stock.¹

2. Use an accurate and comprehensive definition of equity and incorporate equity metrics to identify, select, and prioritize projects.

Using “equity” to describe the provision of equivalent funding to each subregion, as it is used in the existing language of the guidelines, is inaccurate and misleading. Equity and geographic equality are not one in the same. Equity matters because every community has different starting points and trajectories due to racism and systemic oppression. Typically, groups that experience inequities—such as low income people, people of color, undocumented people, LGBT and gender nonconforming people, people with disabilities, and women—also historically lack political, social, or economic power. In the transportation context, equity ensures that regardless of race or income, people have access to and are provided the same quality of infrastructure investments as others who are not in a marginalized community. The guidelines should require that cities first use funds to identify high collision corridors. They should then explicitly prioritize projects on high collision corridors in communities that have been historically neglected by infrastructure investment and transportation planning; often low-income communities and communities of color that are transit dependent. These areas can be identified through a set of equity metrics which include: mapping of high collision corridors, low-income population, race/ethnicity, and concentrations of people with no car ownership.

3. Provide further guidance on how cities may use multi-benefit Local Return investments, establish performance metric tracking, and require annual audits.

Make sure that all local jurisdictions have sufficient access to information regarding recommended practices for making streets green and complete. Provide tools that help jurisdictions identify opportunities for multi-benefit investments, and establish a performance metric tracking system to help them monitor their progress across several indicator areas, such as urban heat and quality of pedestrian and bicycle infrastructure. Performance metric tracking will give Metro-area projects an advantage when applying for State or Federal funds, and could drive progress by tying improvement to incentives within Metro’s own competitive funding

programs. Establishing an annual audit that follows budget season will help ensure guidelines are being implemented correctly.

4. Develop more detailed guidelines over the next year to maximize the benefits of the Countywide Active Transportation Program.

Measure M includes the first dedicated local funding source for walking and biking, though at only 2% of the measure, this funding falls far short of the identified need. That makes it critical that this limited funding is prioritized for the projects and programs that will have the greatest benefits. Since walking and biking are particularly prevalent in low-income communities and communities of color, we believe this extra year for guidelines development will also provide an opportunity to integrate social equity metrics into this program.

We would welcome amendments to the Draft Guidelines rooted in equity, that help stem the tide of displacement, produce and preserve affordable housing near transit across the County, adequately resource active transit and safe streets, and create world-class transportation options for low-income communities and communities of color.

Sincerely,

Alliance for Community Transit - Los Angeles
Good afternoon,

Please find attached a comment letter from the EnviroMetro coalition re. suggested changes to the Measure M Draft Guidelines. I'd appreciate if you could just send a quick reply, confirming your receipt of this attachment.

Thanks,

Bryn

--

Bryn Lindblad
Associate Director
Climate Resolve • 525 S. Hewitt St, Los Angeles, CA 90013 • Office: 213-634-3790 x102 • Mobile: 310-227-0184 • Email: blindblad@climateresolve.org
May 26, 2017

Metro Staff and Board of Directors
1 Gateway Plaza
Los Angeles, CA 90012
submitted via: theplan@metro.net

RE: EnviroMetro Comments on Measure M Draft Guidelines

Dear Metro staff and directors —

First, thank you for this opportunity to provide feedback on the Measure M draft guidelines — a momentous opportunity, indeed.

Our transportation infrastructure and the services that Metro delivers are integral to the social, economic, and environmental well-being of Los Angeles County. In the interest of shaping Measure M’s impact such that it does minimal harm to communities and creates the real positive change voters expect, the EnviroMetro coalition offers the following suggestions for changes to the draft guidelines:

1. Implement performance criteria for Highway subfunds; make harmful expenditures ineligible. All projects funded by Measure M should be in alignment with State climate goals, vehicle miles traveled (VMT) reduction targets, commitment to reduce burdens in disadvantaged communities (DACs) and improve safety (especially for the most vulnerable users on the road: pedestrians and cyclists). “Project readiness” should be defined as meeting certain performance criteria within these objective categories. If funding pre-construction activities, EnviroMetro strongly recommends that Metro place a cap on the percent of project costs for those activities, as a way to discourage harmful highway projects from using up valuable capital resources that could otherwise be spent enhancing communities. Noise mitigation components of projects should be allowed as eligible expenditures, as well as the possibility of repurposing roads for other community uses. Metro should not explicitly exclude “beautification” from eligibility, as green infrastructure improvements provide beautification co-benefits.
2. Expand green infrastructure definition to cooling benefits, innovative materials, and maintenance; require multi-benefits. In addition to stormwater management benefits, green infrastructure can also deliver cooling and shade. As extreme heat days are on the rise, it is crucial that we combat the urban heat island effect on our streets in order to achieve significant improvements in public health and make alternative modes of transportation more appealing to Angelenos. This is especially imperative for low-income communities who are typically transit-dependent and have disproportionately less greening elements in their communities. These green infrastructure elements should be multi-benefit, delivering not only environmental results, but also enhancing the community experience of that space. Trees and biomass as well as innovative materials, such as surface coatings that reflect more solar radiation than their heat-absorbing/radiating alternatives, should be eligible green infrastructure expenditures in all capital project subfunds. The maintenance of this green infrastructure to sustain full lifecycle benefits should an eligible expenditure in all operations and maintenance subfunds.

3. Include recreational transit eligibility in all operations subfunds. This includes transit service to parks and open space, which are otherwise inaccessible to transit-dependent households, resulting in significant disparities in public health outcomes. Currently, recreational transit is only named as an eligible expense in the Local Return section; however, other subfunds that support transit service expansion should also explicitly allow recreational transit service.

4. Provide further guidance on best management practices for delivering multi-benefit Local Return investments; establish performance metric tracking and incentivize improvements. Make sure that all local jurisdictions have sufficient access to information regarding recommended practices for making streets green and complete. Provide tools that help jurisdictions identify opportunities for multi-benefit investments, and establish a performance metric tracking system to help them monitor their progress across several indicator areas, such as urban heat and quality of pedestrian and bicycle infrastructure. Performance metric tracking will not only give Metro-area projects an advantage when applying for State or Federal funds, it could also be used to drive progress by tying improvement to incentives within Metro's own competitive funding programs.

5. Orient competitive funding programs to meet critical needs and leverage multi-benefit investments. Already at this stage, establish guiding principles for the competitive funding programs that are to undergo forthcoming detailed guideline development. Namely, require that performance criteria be developed so that funded projects meet clearly identified objectives such as: network connectivity, multi-modal mobility, sustainability, safety, equity, and community engagement. It is also crucial that Metro provide technical assistance to DACs so that communities most in need of transportation investments have a good chance at applying for those competitive funds.
6. Create a short-term pathway for new priorities to emerge; establish robust public participation standards for program development. The five- and ten-year timeline horizons for Measure M program amendments is too long to respond to community needs. Especially given the gaps that exist in the expenditure plan for creating a comprehensive regional active transportation network, a mechanism needs to exist whereby new programs — that meet performance criteria named above, which are to be included in the Measure M master guidelines — may become eligible for Measure M funds. For example, the Greenway Network is left out of most subregions’ mobility matrices top project lists; however, this should not persist as an undue impediment for those remaining subregions to pursue such projects. As such, the definition of the Greenway Network should be expanded beyond routes that are adjacent to urban waterways to also include routes that utilize other existing public right-of-ways, such as utility corridors and abandoned rail lines.

Additionally, when the opportunity presents itself:

7. Consider initiating a process to bring previous revenue sources’ requirements into alignment with Measure M eligibility and performance standards. Prop A (1980), Prop C (1990), and Measure R (2008) continue to be significant sources of revenue for transportation infrastructure spending, and discrepancy between the eligible cost provisions of the now-four local sources of funding present challenges to local and subregional implementers. Metro should initiate a process to update those previous revenue sources’ guidelines to better support multi-modal, green infrastructure spending, in alignment with the Measure M guidelines and evolving voter attitudes.

As you continue this process of refining the Measure M guidelines, we encourage you to be ambitious in estimating the potential that you have to transform Los Angeles’ transportation landscape into a greener, healthier, more equitable one. We also urge you to exercise caution and prevent Measure M funds from being expended in ways that would exacerbate environmental harms and hurt vulnerable communities. We offer our partnership in the effort to further develop any and all of the ideas presented above. We invite you to contact Bryn Lindblad at blindblad@climateresolve.org / (213) 634-370 x102 if you have any questions regarding the contents of this letter.

Sincerely,

Bryn Lindblad, Associate Director, Climate Resolve
Caro Jauregui, Senior Manager of Policy and Programs, California Walks
Claire Robinson, Managing Director, Amigos de los Rios
Dan Silver, Executive Director, Endangered Habitats League
Daniel Rossman, Senior Regional Representative, The Wilderness Society
Darrell Clarke, Transportation Chair, Sierra Club, Angeles Chapter
Denny Zane, Executive Director, Move LA
Fernando Cazares, Senior Program Manager–Climate Smart Cities, Los Angeles, Trust for Public Land
Jack Sahl, Managing Executive Director, Friends of the Angeles Forest
Jackson Lam, Community Organizer, Asian Pacific Policy and Planning Council
Jenny Binstock, Policy and Campaigns Specialist, TreePeople
Kristen Pawling, Los Angeles Urban Solutions Coordinator, Natural Resources Defense Council
Lilly Shoup, Policy Director, APA Los Angeles
Mark Masaoka, Policy Director, Asian Pacific Policy and Planning Council
Melanie Winter, Director, The River Project
Omar Gomez, Director of Programs and Public Policy, COFEM and Chair, San Gabriel Mountains Forever
Rita Kampalath, Science and Policy Director, Heal the Bay
Viviana Franco, Founder & Executive Director, From Lot to Spot
Wesley Reutimann, Executive Director, LCI #4280, Bike San Gabriel Valley
Will Wright, Director, Government & Public Affairs, AIA Los Angeles
Hello,

Please find Advancement Project California’s comment letter in response to Metro’s draft Measure M guidelines attached. Please feel free to contact me with any questions.

Thanks,
Megan

Megan McClare
Director of Health Equity
ADVANCEMENT PROJECT CALIFORNIA

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Follow us: Facebook | Twitter

Educational Equity | Equity in Public Funds | Health Equity | Political Voice
May 25, 2017

Mr. Phillip A. Washington
Chief Executive Officer
LA Metro
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Mr. Washington:

Advancement Project California commends LA Metro for their work on the draft Measure M Guidelines, as it is an integral step in holding the County accountable to a holistic transportation system. Transportation serves as a lifeline - it determines our access to housing, jobs, health-care resources, schools, and food. All communities should have an effective transit network that is safe and accessible.

We reviewed the draft guidelines to assess how the implementation of Measure M projects and programs will impact County residents who have historically been overlooked in such planning decisions. The Draft Measure M Guidelines does a remarkable job in detailing oversight and management logistics, project eligibility and processes, and commitments to previous community plans and policies. However, we are concerned that the guidelines fail to address key equity and environmental issues that particularly affect low-income residents and communities of color.

1. DECISION-MAKING PROCEDURES AND STRUCTURES

Although the guidelines explain LA Metro’s obligation to project readiness, acceleration, and assessment, there is a lack of transparency on who makes these decisions and how they are made. In order for LA County residents to provide substantial input during project planning, LA Metro must clearly communicate the decision-making procedures and structures that influence these projects and programs.

- The Multi-Year Subregional Programs (MSP) section relies heavily on projects that are included in the Mobility Matrices of each Council of Governments (COGs). The Measure M Guidelines must detail a selection and prioritization methodology that allows COGs to assess and refine the projects within the Mobility Matrices. We understand the need for a timely use of Measure M funds, but the guidelines should ensure that COGs prioritize projects in areas with a high need and community buy-in, instead of projects that are merely “shovel ready.”
2. MEANINGFUL AND CONSISTENT COMMUNITY ENGAGEMENT

LA Metro should incorporate community engagement strategies into the Measure M Guidelines to guarantee that residents and other stakeholders are meaningfully involved in the project identification, development, implementation, and evaluation processes. **Mandating a streamlined and consistent engagement and outreach strategy for Measure M-funded developments will ensure that investments are relevant, necessary, and approved by community members and stakeholders.**

- The Multi-Year Subregional Programs (MSP) must incorporate a selection and prioritization procedure that requires Council of Governments (COGs) to amend its Mobility Matrices that is in alignment and consistent with the community residents and local businesses' current needs and interests. In addition, planning, community participation, and non-corporal activities should also be eligible for Measure M funding, to ensure that community engagement is not an afterthought in project planning.

- The "2% ADA paratransit for the disabled; LA Metro discounts for seniors and students" section prioritizes ADA with a maximum of 75% for ADA paratransit and a minimum of 25% for LA Metro discounts for seniors and students. LA Metro should gather additional community input on the allocation of ADA paratransit funds as there was not a previous opportunity to provide public comment.

- Since the Local Return funds are managed by the cities and unincorporated areas of Los Angeles and are most flexible in its eligible used, these jurisdictions must be held accountable to fund projects that reflect their community's priorities. We commend LA Metro for prioritizing projects that align with existing community plans and policies - such as Vision Zero and Complete Streets - which provides data-informed and community-driven models for equitable transportation planning.

3. EQUITY-DRIVEN IMPLEMENTATION

We urge LA Metro to create mechanisms that identify and intentionally invest in communities with the highest need - especially those areas that have historically been underinvested and environmentally burdened. Factors like race, income, age, vehicle ownership, susceptible to injury, and exposure to hazardous environmental conditions are strongly linked with access to healthy land use and community design. It is important that Measure M resources are allocated to address and rectify these existing inequities in multi-modal transportation infrastructures so that all Angelenos can benefit.

It also important that LA Metro ensure that transit and transportation investments do not harm the communities it aims to protect. Research has demonstrated that large-scale transportation investments serve as drivers in displacing low-income residents, communities of color, and small business owners. Metro resources should be coupled with anti-displacement measures that preserve affordable housing and increase tenant protections. **Local return investments should build off the work Metro is already**
doing to encourage both the production and preservation of accessible, equitable transit-oriented communities (TOCs), such as Metro’s Joint Development affordable housing policies and the Metro Affordable Transit Connected Housing Program. The guidelines should explicitly support local return investments ensure existing transit dependent residents can remain in TOCs.

Overall, Advancement Project California is pleased with the draft Measure M Guidelines and believe that it is a solid foundation for funding the future transportation fabric of Los Angeles County. We believe that incorporating the above recommendations will ensure that all our residents have a safe, accessible, and effective transit network.

For any questions or further comments, please contact our Director of Health Equity Megan McClaire at MMcClaire@advanceproj.org.

Sincerely,

Megan McClaire
Health Equity, Director
Advancement Project California
Good afternoon,

Attached are our comments on the Measure M draft guidelines. Thank you for considering our recommendations.

Sincerely,
Jessica
May 26, 2017

Mr. Phillip A. Washington
Chief Executive Officer
Metro
One Gateway Plaza
Los Angeles, CA 90012

Comments on Draft Measure M Guidelines

Dear Mr. Washington,

Investing in Place congratulates Metro staff on the release of the draft Measure M Guidelines for public review. These guidelines mark a key step toward the implementation of Measure M’s promise to provide Los Angeles County residents with access to a safe, reliable, affordable, and sustainable transportation system. Investing in Place reviewed the draft guidelines with an eye toward how implementation of Measure M projects and programs will translate into improvements on the ground in communities throughout the county.

We believe that investments in the transportation system should support safe, healthy, and equitable communities. Historically, transportation decisions have not shared these objectives, oftentimes dividing or demolishing neighborhoods, increasing pollution, and making streets more dangerous for people walking, biking, and accessing transit. In recent years, we’ve seen tremendous progress on reversing these trends through supportive policy for complete streets, first and last mile access, and green infrastructure. Our support for Measure M was predicated on the notion that additional funding would help implement these new policies, while understanding that many of the details on implementation would need to be worked out in the guidelines.
Mr. Phillip A. Washington  
May 26, 2017  
Page 2

Indeed, it is the guidelines that describe the exact mechanisms by which general policies are applied to each project and program, including fundamental aspects like what criteria are used to select projects for funding, who makes those decisions, and how stakeholders are engaged throughout the process. These process questions speak to several of Investing in Place's core values: data-driven decisionmaking, community engagement, and prioritization of the needs of low-income communities and communities of color. We believe that Measure M will only live up to its potential if these values are integrated into all aspects of the measure's implementation.

We are encouraged that the draft guidelines are largely consistent with Measure M's vision for a balanced transportation system and have a strong focus on delivering tangible benefits efficiently and effectively. In April, we released an analysis\(^1\) of the draft guidelines that reviewed their strengths and weaknesses and included preliminary recommendations for improvements. Since that time, we have continued to engage public agency and COG staff, policy experts, and partner organizations to refine these recommendations. Based on our research and discussions, we offer the following specific recommendations for improving the draft guidelines.

General Recommendations

1. The Measure M campaign sold voters on a vision of a transportation system that works for everyone, where people can walk, bike, take transit, and drive safety on well-maintained infrastructure. Measure M went so far as to include a definition of complete streets in the ordinance language. Metro's Complete Streets Policy is the primary mechanism for implementing this vision, yet the draft guidelines are vague about its applicability to some programs. The final guidelines should clarify that Metro's Complete Streets Policy applies to all funding programs, including multiyear subregional programs, and define Metro's oversight role to ensure compliance.

2. A world-class transportation system is more than the sum of its parts. Measure M isn't just a collection of projects--it is a vision for a more effective system that provides people real mobility options. To fulfill this vision, the final guidelines should ensure broad eligibility of programs that support behavior change (i.e. TDM), planning, project development, and data collection, not just capital projects. These relatively inexpensive programmatic investments will increase the effectiveness and utilization of the new infrastructure.

3. Measure M included a number of flexible funding programs without predetermined projects, yet many of these funding programs have undefined project selection criteria. While more specific recommendations for some programs are provided below, as a general rule the final guidelines should avoid distributing funding in any program on a

\(^1\) https://investinginplace.files.wordpress.com/2017/04/measuremguidelines-april2017policyanalysis.pdf
"first come, first served" basis. Doing so is unstrategic and would miss the opportunity to select the most effective projects based on clearly defined performance measures.

4. Los Angeles County is a diverse region with many different needs, and the guidelines' role is to help allocate resources to projects that address those needs. In the face of so many competing pressures and limited resources, it is important to set policy based on common values and defined objectives. It is hard to meaningfully address the needs of low-income communities and communities of color in the absence of an equity policy that clearly defines these communities and their mobility needs. The final guidelines should anticipate such a policy in the Long Range Transportation Plan (LRTP) and include mechanisms to advance social equity in the Implementation of Measure M programs, such as prioritization and/or set-asides in funding programs.

Multiyear Subregional Programs

5. The Multiyear Subregional Programs were created out of the recognition that many needed investments fall somewhere in between major regional capital projects and purely local projects. These programs' flexibility is a huge opportunity for innovation, but also a risk for accountability. They essentially have to be built from scratch in order to develop administrative processes that are transparent, performance-driven, accountable to stakeholders, and assign the appropriate level of authority to the appropriate decision-makers. Due to the complexity of this issue and the many stakeholders involved, Investing in Place would support up to a one year extension for Metro staff and the Policy Advisory Council to develop specific guidelines for the Multiyear Subregional Programs. We believe this extension would not meaningfully delay any projects that would be funded by these programs due to the time it will take for sales tax revenues to accumulate in the first year.

6. Before the Measure M Expenditure Plan was developed, Metro worked with each subregion to create a Mobility Matrix to compile previously identified funding needs into a single document. While useful, this process was not by any means an exhaustive evaluation of mobility needs. Instead, it relied heavily on prior planning studies, some of which were decades old. Jurisdictions without existing plans, particularly low-income cities, were not able to participate fully. As a result, the Mobility Matrices generally underreported needs for active transportation projects, didn't include complete streets elements in project costs, and overlooked many needs in low-income communities and communities of color. These systemic flaws should not be carried forward into the Measure M programs. The final guidelines should remove explicit references to the Mobility Matrices for determining eligibility or priority within funding programs, and instead have clear criteria for project selection and prioritization consistent with current policies and practices.
7. The Multiyear Subregional Programs would be more effective if advance planning functions are baked into program administration. Programmatic studies, data collection, project development, pre-construction, and evaluation activities are all critical to managing an effective funding program, but under the draft guidelines these expenditures wouldn’t be eligible. The final guidelines should incorporate these activities into each subregional program.

8. If a one year extension to develop a consensus on governance isn’t possible, we propose the following framework for subregional program administration:

- The default would be a competitive grant program administered by Metro through a Call for Projects-like process tied to the five Measure M objectives: Mobility, Economic Benefit, Accessibility, Safety, and Sustainability and Quality of Life. Depending on the size of the program and anticipated award amounts, the program would follow either annual or biennial cycles. All eligible project sponsors in each subregion would be able to apply directly for funding.

- Subregions that desire a larger role in program administration would have the ability to opt in to a collaborative program management structure by entering into a Memorandum of Understanding (MOU) with Metro that delegates some administrative functions to the subregion. All MOUs should, at a minimum, address the following issues:

  - **Transparency and Accountability** - Each program should have clear goals and objectives, eligibility criteria, and project selection processes. A publicly available program matrix should be maintained that includes each project’s scope, schedule, funding amount and source for each phase, documentation of community engagement, and contact information for the project manager. The program administrator should also be required to issue annual reports on the overall program’s expenditures and effectiveness, including project delivery and achievement of program objectives.

  - **Collaborative Decision-Making** - It is appropriate for the COGs to have a role in selecting projects and programs for funding, but their authority should not be absolute. COGs have a responsibility to engage local stakeholders (see public participation and capacity and standards) and proposed project lists should be submitted regularly (e.g. annually) for approval by the Metro board. These project lists should be justified by an evaluation of each project’s merits, consistent with program objectives. There should also be an appeals process for local jurisdictions whose projects are not selected for funding.
Public Participation - COGs have traditionally flown below the radar with stakeholders, many of whom are not familiar with their local COG or how to engage effectively with them. COGs’ committees often meet at times that are not convenient for community members, and decision-making processes are generally not clear or welcoming. While some COGs work well with outside stakeholders, this is not consistent across the county and something we can not afford to overlook given the magnitude of this funding. With potential increased authority from Measure M programs, comes an increased responsibility for COGs to seek greater public participation in decision-making and transparency in their operations. Each program should be required to create a public participation plan that includes effective strategies for engaging community members, particularly in low-income communities and communities of color. COGs should identify community-based organizations that serve these populations and collaborate with them to develop their public participation plans for each program.

Performance Measures - Measure M projects were all evaluated according to consistency with five overarching objectives: Mobility, Economic Benefit, Accessibility, Safety, and Sustainability and Quality of Life. Similarly, the subregional programs should also be required to demonstrate consistency with these countywide objectives. Investing in Place encourages program administrators to go beyond these basic objectives to define more specific, measurable outcomes for each subregional program and collect sufficient data to evaluate the effectiveness of the investments.

Innovative Project Development - Many cities already have project ideas in mind for funding from the subregional programs—and many of these are in fact good projects. But transportation planners also have a responsibility to evaluate overall system performance and proactively develop projects that address critical needs, such as traffic safety and network connectivity. Most local jurisdictions don’t have the capacity to take on cross-jurisdictional projects or the expertise needed to explore more innovative solutions. The transportation industry has changed rapidly in just the past few years and will continue to do so: shared mobility services and new technology have the potential to upend traditional capital projects, while community-based projects like sidewalk and crosswalk programs, improving first and last miles access to bus and train stops, safe routes to school, pedestrian plazas, and protected bike lanes are increasingly demanded by stakeholders to address safety and
economic development objectives. COGs can and should collect the data needed to identify transportation challenges and work with their member cities, regional agencies, and local stakeholders to develop innovative and multimodal solutions.

- **Capacity and Standards** - Each of the county's nine subregions is administered differently. Some have COGs and some don't. Some COGs are well-established in terms of staff capacity and technical expertise and others just have part-time staff. Engagement with external stakeholders also varies widely across the subregions. Without some standardization on how COGs operate, such as record keeping, budget transparency, and public participation, it is difficult to imagine COGs being effective administrators for Measure M programs. Program administration—not to mention data collection, subregional planning, and project development—requires resources and it is reasonable for these costs to be borne by the associated Measure M program. However, in order to be eligible for funding for administration, COGs should be required to enter into an MOU with Metro addressing all of the considerations outlined above.

**Highway Programs**

9. The Highway Programs represent a significant portion of Measure M expenditures, yet they lack clear, multimodal objectives for evaluating project effectiveness. Performance measurement for highways is a quickly evolving field and the guidelines should reflect this evolution by incorporating the latest research. For example, highway metrics should take into account induced demand when calculating the anticipated benefits of a highway project. The final guidelines should be clear about what these programs aim to achieve and define objectives that reflect current planning practice. Measures like travel time reliability and vehicle miles traveled (VMT) can provide a more accurate representation of the benefits and pitfalls of proposed highway projects than the outdated level of service (LOS). Other metrics should analyze benefits and impacts on public health, sustainability, and social equity. Finally, program metrics should tie to regional performance metrics in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to ensure that projects contribute toward regional goals.

10. Traffic collisions kill over 500 people each year in Los Angeles County and are the leading cause of death for children ages 2 to 14. These collisions happen on freeways, urban arterials, and local streets, all of which are considered “highways” by Measure M. In addition to the catastrophic toll this traffic violence takes on our families and communities, collisions are a leading source of traffic delays that reduce the efficiency of our roads. Addressing chronic safety issues on our streets and highways will save
lives and ease congestion, a clear win-win. Despite this, the highway program objectives lack a clear focus on safety, particularly for vulnerable road users. The final guidelines should make safety the first objective for all highway programs, with particular emphasis on people walking and biking. All subregional highway programs should be required to evaluate fatal and serious injury collision hotspots within their program area (i.e. a High Injury Network) and include safety countermeasures in projects within those areas.

11. All arterials—and even some State Highways—are city streets that require context-sensitive solutions to accommodate all people and modes of transportation that use them. While all highway program objectives should promote multimodal outcomes consistent with Metro’s Complete Streets Policy, funding programs intended to improve city streets must do so with unambiguous objectives to meet the needs of people walking, biking, and taking transit as well as people driving. Furthermore, eligibility for highway program funds should be determined with a complete streets approach. The draft guidelines are quick to rule so-called beautification as an ineligible use of highway funds, without recognizing that streetscape elements like benches and trees that provide shade are functionally important infrastructure for people who are walking to the bus, to the store, or to school. The final guidelines should clarify eligibility of streetscape elements, such as pedestrian amenities, shade trees, and green streets, that have functional purposes aside from beautification. As mentioned previously, these programs should also include broad eligibility for TDM programs that complement multimodal infrastructure improvements.

**Countywide Active Transportation Program**

12. Measure M includes the first dedicated local funding source for walking and biking, though at only 2% of the measure, this funding falls far short of the identified need. That makes it critical that this limited funding is prioritized for the projects and programs that will have the greatest benefits. Investing In Place supports developing more detailed guidelines over the next year to maximize the benefits of this program. Knowing that walking and biking for transportation are particularly prevalent in low-income communities and communities of color, we believe this extra year for guidelines development will also provide an opportunity to integrate social equity metrics into this program.

13. While it is important for some of this funding to support promising local projects and programs, Metro can and should first allocate stable funding for its own ongoing countywide program needs, including open streets, bike share operations, bike safety education, and safe routes to school non-infrastructure programs. Next, Metro should
target assistance to planning and project development in disadvantaged communities\(^2\) to help level the playing field in terms of resources for active transportation as well as to increase the region’s competitiveness for state and federal funding programs. Finally, Metro should focus its limited resources on supporting innovative pilot projects that can advance the state of the practice for active transportation projects and programs in Los Angeles County.

**Subregional Equity Program**

14. The Subregional Equity Program is equivalent to nearly $1.2 billion across eight subregions, yet the program has no objectives, no eligibility or selection criteria, and no timeline for implementation. While the draft guidelines say that additional evaluation criteria will be developed within a year, in the interim, projects will be funded on a first come, first served basis. As previously described, first come, first served is not a strategic method for allocating transportation funding. Before any Subregional Equity Program funding is allocated, Metro should work with each subregion to identify which projects and programs are priorities for this funding. For example, the Gateway Cities left active transportation funding as “To Be Determined” in the Expenditure Plan. The $244 million in supplemental funding for the subregion would be a good source for meeting this otherwise unfunded commitment to active transportation. All subregions should conduct a transparent process for prioritizing this additional funding with robust public participation.

**ADA Paratransit and Student and Senior Discounts**

15. The draft guidelines propose to allocate up to three-quarters of this funding for ADA paratransit service and the remaining funding to a revised fare discount program. (There is conflicting language in the draft guidelines whether the 25 percent for fare discounts is a minimum or a maximum. This needs to be resolved.) This proposed funding split was not vetted with interested stakeholder groups that represent the affected communities. Metro proposes to leverage Measure M funding by reforming the existing underutilized fare subsidy program to serve more riders. While we agree generally that this is a strategic approach, again, this proposal was not vetted by stakeholders. We recommend allowing for up to one year to establish sub-guidelines for this investment category to allow for additional public participation, similar to processes proposed in various other investment categories.

**Local Return**

\(^2\) Investing in Places has proposed that Metro adopt a definition for “Equity Opportunity Zones” in the Long Range Transportation Plan to direct transportation resources to benefit communities with a history of disinvestment. For more information, see: [http://bit.ly/TEOZpaper](http://bit.ly/TEOZpaper)
16. The draft guidelines include eligibility for Transit-Oriented Communities in Local Return, however what this means is not clearly defined. The use of “Communities” rather than the more traditional term Transit-Oriented Development is a nod to the idea that transit-supportive land use is more about the built environment that makes up a whole neighborhood rather than any single development project. Investing in Place supports this holistic approach. Local return investments should build off the work Metro is already doing to encourage both the production and preservation of accessible, equitable transit-oriented communities, such as Metro’s Joint Development affordable housing policies and the Metro Affordable Transit Connected Housing Program. The Guidelines should explicitly support local return investments into not just the creation but the preservation of existing affordable housing in order to ensure existing transit dependent residents can remain in TOCs.

17. The Measure M Ordinance clearly stipulates that Local Return funding should be allocated according to population. In various discussions leading up to the Measure M Ordinance, alternative formulas were considered and dismissed as less equitable. For example, formulas based on road miles or land area would favor sprawling jurisdictions over those with more efficient land use and transportation patterns. Sales tax receipts-based or employment-based formulas would favor those jurisdictions that have overbuilt office and retail and underbuilt housing supply in the midst of a historic regional housing shortage. Despite the consideration and rejection of alternative formulas, the draft Measure M Guidelines include a proposal for a minimum allocation of $100,000 per year to eight jurisdictions that would otherwise receive less funding from the per-capita formula. This extra funding would come from proportionally reducing allocations to all other 81 local jurisdictions. The eight jurisdictions that would benefit from the Local Return floor fall into two categories: they are either small, exclusive suburbs born out of a history of residential segregation or industrial tax havens that have intentionally excluded residents to avoid accountability for environmental justice impacts from heavy industry. Meanwhile, the donor cities would include densely populated, low-income communities like Bell, Cudahy, and Lawndale. Adjusting the Local Return floor higher or lower than $100,000 would change the list of which cities benefit and which ones are impacted, but it wouldn’t change the fundamental calculation that the cities that benefit the most from any Local Return floor are those with a history of exclusion and/or environmental Injustice. For this reason, Investing in Place strongly opposes any Local Return floor.

Again, congratulations on reaching this important milestone. We appreciate your diligent consideration of these recommendations and continued engagement with diverse stakeholder groups through the Policy Advisory Council. If you have any questions, please contact at jessica@investinginplace.org or (213) 210-8136.

Sincerely,
Organizations:
- Stephanie Ramirez, Associate State Director of Community, AARP California
- Jackson Lam, Asian Pacific Policy & Planning Council (A3PCON)
- Caro Jauregui, Senior Manager of Policy and Programs, California Walks
- Bryn Lindblad, Associate Director, Climate Resolve
- Christy Zamani, Executive Director, Day One
- Jessica Meaney, Executive Director Investing in Place
- David Levitus, Executive Director, LA Forward
- Kristen Pawling, LA Urban Solutions Coordinator, NRDC
- Maryjane Puffer, Executive Director The Los Angeles Trust for Children’s Health
- Mark Glassock, MPH, Director of Special Projects, Los Angeles Neighborhood Land Trust
- Andrew Pasillas, Southern California Regional Policy Manager, Safe Routes to School National Partnership
- Andres Cuervo, Vice President & Transportation Chair, Palms Neighborhood Council
- Melanie Winter, Director, The River Project
- Bart Reed, Executive Director, The Transit Coalition
- Cynthia Rose, Director, Santa Monica Spoke
- Gregory Wright, Sherman Oaks Neighborhood Council Transportation & Green Committees Member, Sherman Oaks
- Malcolm Harris, Director of Programs and Organizing, T.R.U.S.T. South LA

Individuals:
- John Guevarra, Resident, Los Angeles
- Remigio Mateo, Resident, Los Angeles
- Hunter Owens, Resident, Los Angeles
- John Ruby, Resident, Los Angeles
Kerry Cartwright, P.E.
Director of Goods Movement
310-732-7702/310-357-4996 (cell)

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METRO Measure M Draft Guidelines
Ports of Los Angeles/Long Beach Comments

2% System Connectivity Projects (Highway Construction Subfund) (p. 43 of draft guidelines)

The projected amount of annual funding for the “Highway – System Connectivity 2%” category is lacking in the program info and guidelines. The approved measure also listed “earmarked” projects that are within this subfund, thus diminishing the total available amount for a competitive process. Thus, the “Highway – System Connectivity 2%” program should be limited to solely goods movement projects, justified for the following reasons:

- Draft guidelines emphasizes goods movement
- Significant program earmarks for all other modes/needs, except ports/goods movement
- Local return formula funds not accessible by the Ports of LA/LB on behalf of goods movement sector
- Alameda Corridor East has Measure M (and R) earmarked projects
- Difficulty obtaining formula subregional funds (via Gateway COG, South Bay COG, etc.)
- Limited amount available in “2% Highway” program.

The development of the “Highway – System Connectivity 2%” program guidelines should be done collaboratively, and solely with the goods movement sector and pertinent public agencies and private sector entities. This should be done concurrently with the development of METRO’s Goods Movement Plan. The goods movement sector has collaborated for many years at the federal, State, and regional level, and has already identified needs and projects. Hence, a minimal amount of time needs to be spent on this plan development. Additionally, a few to several critical, high priority projects should be earmarked initially, as done with numerous other Measure M projects as part of the approved ordinance. The Ports, SCAG, and METRO have collaborated for many years on such priority projects, and identified them via numerous studies. Such projects include then Ports of Los Angeles/Long Beach rail projects that reduce truck trips throughout the region, as a few interchange projects on I-110 and SR 47.
Thompson, Keira

From: SCV Bicycle Coalition Chapter of LACBC <scvbicyclecoalition@gmail.com>
Sent: Friday, May 26, 2017 3:09 PM
To: THEPLAN
Subject: Measure M Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom it May Concern:

As a resident of Santa Clarita, and the Chairperson of the Santa Clarita Valley Bicycle Coalition, a chapter of the Los Angeles County Bicycle Coalition, I feel it is imperative that I impress upon our leaders at Metro the importance of Measure M funding in providing better transportation options for all residents of LA County. Santa Clarita stands to receive a large portion of funding through Local Return provided by this measure. I hope that such funds will be used on projects that will provide multiple benefits to the most people for our area.

Santa Clarita has great challenges in meeting transportation needs, particularly when it comes to those of us who must use walking, biking or transit in order to get where we want to go. The Santa Clarita Valley is a wide place, filled with bridges and roadways that are controlled by multiple jurisdictions (City, County and State) and often the City cannot make changes or fund changes desired by the public. The roadways are large and fast moving, less oriented to the residential neighborhoods that they connect, and much more designed to quickly cut through the city so that traffic can reach the freeway system. We don't need more interior highways through our city, we need better ways to destinations within it, and to reach each other; ways to connect our community better.

Our city has voiced a collective desire to become a better place to live based upon such principles as: community connection, public safety, enhancing beautification, and sustaining public infrastructure. We are doing these things though our local government in a proactive and responsive manner. In order to see some of these goals met through improvements to transportation, we need clarity and guidance on how Local Return funds may be used to meet our community's needs. Metro should provide tools and resources so that our city can better identify opportunities for utilizing Local Return funds. Our city has a very comprehensive non-motorized plan which includes complete streets designs, multi-purpose trails and bikeways, connectivity gap closures, and has designed and designated open spaces to be preserved. Many of those plans have yet to be executed or realized because they lack of reliable and renewable funding. Measure M stands to be a great boon to our area, but without guidance and oversight, we may be unable to initiate the most desired, or necessary, of these projects in a timely manner.

It cannot be overstated that we have a great issue with pedestrian and bicyclist safety that our residents take very seriously too. We have had many pedestrian and bicyclist injuries and deaths due to the size, high speeds, and complexities of our roadways. Funding challenges should not impede our ability to give our residents choices in safer routes.

Santa Clarita has plans that aspire to meet the needs of our public, and in ways that align with our community values, but those plans need funding specific to them. As we reach for those values, it is imperative that Active Transportation Plans are not viewed secondarily behind massive infrastructure projects. Santa Clarita is one of the last cities in LA County that will see significant new residential construction in future decades. Completing Active Transportation networks ahead of new development and requiring developers to execute Transit
Oriented Design is critical to healthy city, county and regional growth. We want to look forward and plan ahead, give our current and future residents safe and reliable options, rather than re-engineer the limited, short sighted designs of the past.

Please assist us with reaching the residents who elected to fund Measure M.

Thank you.

Sincerely,

Nina Moskol, Chairperson, Santa Clarita Valley Bicycle Coalition
Dear Metro Staff and Board of Directors,

Prevention Institute thanks you for the opportunity to provide feedback on the draft Measure M guidelines. We congratulate Metro on this important milestone toward implementation. Attached you will find a letter expressing our support and outlining a number of recommendations we believe would further strengthen the guidelines. If we can provide any further information or clarification, please let me know.

Thank you,
Rachel Bennett, MPH, MURP
Associate Program Manager
Prevention Institute
(510) 444-7738
rachelb@preventioninstitute.org
www.preventioninstitute.org
May 26, 2017

Metro Staff and Board of Directors
1 Gateway Plaza, Los Angeles, CA 90012
Submitted via: theplan@metro.net

RE: Comments on Measure M Draft Guidelines

Dear Metro Staff and Board of Directors,

Prevention Institute appreciates the opportunity to provide feedback on the draft Measure M guidelines and congratulates Metro on this important milestone toward implementation. Prevention Institute is a nonprofit national center dedicated to improving community health and well-being. We have five full-time staff based in South LA working to advance health equity and safety in the community and region. Our Managing Director, Manal J. Aboelata, is a co-founder of the resident-based walking group, CrenshawWalks, and co-convenes SLAAM (South Los Angeles Alliance for Mobility), a network of allied organizations supporting community dialogue on issues pertaining to active transportation and mobility. We are deeply committed to a healthy, equitable, safe, accessible, reliable, affordable, and sustainable transportation system for Los Angeles.

Measure M presents an unparalleled opportunity to build not only a world-class transportation system, but also to ensure transportation equity as investments are being made in communities throughout LA County. Prevention Institute believes that this means respecting the needs and dignity of all communities, and rebuilding trust between powerful public agencies and low-income communities of color that have historically been disinvested in and have paid the price with their health, economic stability, and wellbeing for decades. To ensure the effective and equitable implementation of Measure M, we urge Metro to include the following recommendations, developed by our partners at the Los Angeles County Bicycle Coalition, in the guidelines:

1. **Use an accurate and comprehensive definition of equity and incorporate equity metrics to identify, select, and prioritize projects.** Using “equity” to describe the provision of equivalent funding to each subregion, as it is used in the existing language of the guidelines, is inaccurate and misleading. Equity and geographic equality are not one in the same. Equity matters because every community has different starting points and trajectories due to racism and systemic oppression. Typically, groups that experience inequities—such as low income people, people of color, undocumented people, LGBT and gender nonconforming people, people with disabilities, and women—also historically lack political, social, or economic power. In the transportation context, equity ensures that regardless of race or income, people have access to and are provided the same quality of infrastructure investments as others who are not in a marginalized community. The guidelines should require that cities first use funds to identify high collision corridors. They should then explicitly prioritize projects on high collision corridors in communities that have been historically neglected by infrastructure investment and transportation planning; often low-income communities and communities of color that are transit dependent. These areas can be identified through a set of equity metrics which include: mapping of high collision corridors, low-income population, race/ethnicity, and concentrations of people with no car ownership.

2. **Preserve and expand equitable Transit Oriented Communities (TOCs) by ensuring anti-displacement measures are coupled with transportation investments within the same neighborhood.** The guidelines for TOC local return funding should have equity and affordability as an explicit goal and expand potential...
TOC investments to include the preservation of existing affordable housing near transit. Affordable housing preservation strategies are critical to ensuring existing transit dependent residents can remain in TOCs. Local return investments should build off the work Metro is already doing to encourage both the production and preservation of accessible, equitable transit-oriented communities, such as Metro’s Joint Development affordable housing policies and the Metro Affordable Transit Connected Housing Program. Priority TOC areas can be identified by a low median household income, high percentage of renter households, potential for market strength change, and vulnerability of existing housing stock. Specifically, in the City of Los Angeles, we are calling for at least 10% of local return funding to capitalize a City of LA-specific equitable TOC preservation fund so that mission-driven organizations can acquire and preserve at-risk affordable units in TOC areas that are particularly vulnerable to displacement pressures.

3. Provide further guidance on how cities may use multi-benefit Local Return investments, establish performance metric tracking, and require annual audits. Make sure that all local jurisdictions have sufficient access to information regarding recommended practices for making streets green and complete. Provide tools that help jurisdictions identify opportunities for multi-benefit investments, and establish a performance metric tracking system to help them monitor their progress across several indicator areas, such as urban heat and quality of pedestrian and bicycle infrastructure. Performance metric tracking will give Metro-area projects an advantage when applying for State or Federal funds, and could drive progress by tying improvement to incentives within Metro’s own competitive funding programs. Establishing an annual audit that follows budget season will help ensure guidelines are being implemented correctly.

4. Develop more detailed guidelines over the next year to maximize the benefits of the Countywide Active Transportation Program. Measure M includes the first dedicated local funding source for walking and biking, though at only 2% of the measure, this funding falls far short of the identified need. That makes it critical that this limited funding is prioritized for the projects and programs that will have the greatest benefits. Since walking and biking are particularly prevalent in low-income communities and communities of color, we believe this extra year for guidelines development will also provide an opportunity to integrate social equity metrics into this program.

5. Implement performance criteria for Highway subfunds, make harmful expenditures ineligible, and allow that funds be used for planning active transportation corridors. All projects funded by Measure M should align with State climate goals, help achieve vehicle miles traveled reduction targets, reduce burdens on disadvantaged communities, and improve safety especially for the most vulnerable road users. “Project readiness” should be defined as meeting certain performance criteria within these objective categories. If funding pre-construction activities, Metro should place a cap on the percent of project costs for those activities, as a way to discourage harmful highway projects from using up resources that could otherwise be spent enhancing communities.

6. Expand green infrastructure definition to cooling benefits, do not exclude “beautification” from eligibility, and require multi-benefits. Many green infrastructure improvements provide beautification co-benefits, stormwater management benefits, cooling, and shade. As extreme heat days are on the rise, we must combat the urban heat island effect on our streets, improve public health, and make active transportation more appealing to Angelenos. This is especially important for transit-dependent low-income communities with disproportionately less greening elements in their communities. These elements should be multi-benefit, delivering not only environmental results, but also enhancing the community experience of that space.

7. Include recreational transit eligibility in all operations subfunds. This includes transit service to parks and open space, which are otherwise inaccessible to transit-dependent households, resulting in significant...
disparities in public health outcomes. Currently, recreational transit is only named as an eligible expense in the Local Return section; however, other subfunds that support transit service expansion should also explicitly allow recreational transit service.

8. **Orient competitive funding programs to meet critical needs and leverage multi-benefit investments.** Already at this stage, establish guiding principles for the competitive funding programs that are to undergo forthcoming detailed guideline development. Namely, require that performance criteria be developed so that funded projects meet clearly identified objectives such as: network connectivity, multi-modal mobility, sustainability, safety, equity, and community engagement. It is also crucial that Metro provide technical assistance to DACs so that communities most in need of transportation investments have a good chance at applying for those competitive funds.

9. **All subregions should conduct a transparent process for prioritizing additional funding from the Subregional Equity Program with robust public participation.** The Subregional Equity Program is equivalent to nearly $1.2 billion across eight subregions, yet the program has no objectives, no eligibility or selection criteria, and no timeline for implementation. While the draft guidelines say that additional evaluation criteria will be developed within a year, in the interim, projects will be funded on a first come, first served basis. First come, first served is not a strategic method for allocating transportation funding. Before allocating any Subregional Equity Program funding, Metro should work with each subregion to identify which projects and programs are priorities.

10. **Metro should consider a one year extension to develop specific guidelines for the Multiyear Subregional Programs; the final guidelines should remove any explicit references to the Mobility Matrices for determining eligibility or priority within funding programs.** The Multiyear Subregional Programs were created because many investments fall between major regional capital projects and purely local projects. These programs’ flexibility present a risk for accountability since they essentially must be built from scratch in order to develop administrative processes that are transparent, performance-driven, accountable, and assign the appropriate level of authority to the appropriate decision-makers. In addition, the Mobility Matrices developed by Metro and each subregion did not incorporate an exhaustive evaluation of mobility needs. Instead, it relied heavily on prior planning studies, some of which were decades old. Jurisdictions without existing plans, particularly low-income cities, were not able to participate fully. As a result, the Mobility Matrices generally underreported needs for active transportation projects, didn’t include complete streets elements in project costs, and overlooked many needs in low-income communities and communities of color.

Last November, Los Angeles residents and policymakers unequivocally affirmed their commitment to a more just and healthy future for all Los Angeles communities with the passage of Measure M. Now we must make sure these policies and resources are deployed in ways that will generate health and quality of life for all LA residents, including people of color, low-income people, people renting and owning in low-income neighborhoods, immigrants, and all the diverse communities that make LA special. We are proud to be part of the transformation already underway in LA, and stand ready to support Metro in Measure M implementation.

Sincerely,

Manal J. Aboelata, MPH
Managing Director, Prevention Institute
Thompson, Keira

From: Angela Driscoll <ADriscoll@dpw.lacounty.gov>
Sent: Friday, May 26, 2017 3:42 PM
To: THEPLAN
Subject: I have Draft Measure M Guidelines comments.
Attachments: MEASURE M DRAFT GUIDELINE.pdf

Please find attached, the Los Angeles County Department of Public Works comments on the Draft Measure M Guidelines.

Thank you,
Angela Driscoll
Los Angeles County Public Works
May 26, 2017

Honorable John Fasana, Chairman
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Dear Chairman Fasana:

MEASURE M DRAFT GUIDELINE COMMENTS

On behalf of the Los Angeles County Department of Public Works we are pleased to review and provide our comments to the Los Angeles County Metropolitan Transportation Authority (Metro) on the proposed Draft Measure M Guidelines. Enclosed please find our comments and recommendations.

If you have any questions, please contact me at (626) 458-4001 or your staff may contact Ms. Angela Driscoll at (626) 458-7812 or adriscoll@dpw.lacounty.gov.

Very truly yours,

MARK PESTRELLA
Director of Public Works

AD:al
pure:IGRpub\General\METRO\Comment Letter on Measure M Draft Guidelines

Enc.
The County of Los Angeles Department of Public Works appreciates the opportunity to provide comments on the Draft Measure M Guidelines. We applaud the open and transparent process with extensive stakeholder outreach and participation. Our comments and suggested changes reflect the collective experience and expertise of our staff. We look forward to a continued collaborative partnership with Metro and assisting to fulfill the promises made to the voters of Los Angeles County.

Below, please find our comments and suggested changes to the Draft Measure M Guidelines.

3 Percent Local Contribution

The Guidelines should allow for a sub-regional authority to participate in the local contribution funding plan. The following draft guideline language should be revised as indicated.

• “...the 3 percent local contribution will be proportionately shared by all local agencies based upon local agency’s land area within a one-half mile radius of a new station. Other arrangements agreed upon by every local jurisdiction in a project corridor with a local contribution obligation or a funding plan supported by sub-regional authority are also acceptable, provided that the total of all jurisdictions’ local or sub-regional contributions equals 3 percent of the estimated project cost.”

“An agreement approved by both Metro and the governing body of the jurisdiction, jurisdictions or sub-regional authority shall specify the total project cost as determined at the conclusion of preliminary engineering (30 percent plans), the amount to be paid by the local jurisdiction, jurisdictions or sub-regional authority, and a schedule of payments. Once approved, the amount to be paid by the local jurisdiction, jurisdictions or sub-regional authority shall not be subject to future cost increases.

“Eligible fund sources to satisfy the 3 percent local contribution include any funds controlled by the local agency or local agencies, or sub-regional authority...”

• Given the non-contiguous and dispersed geographical nature of the unincorporated communities of Los Angeles County, the final Guidelines should reflect that any 3 percent local contribution amount attributed to an unincorporated County of Los Angeles area shall be an obligation of the Supervisorial District in which the project is located and not of the unincorporated County of Los Angeles as a whole.
• "In-kind" local contributions as defined should also include the cost of local staff review and approval time from the commencement of the environmental phase through the end of the warranty period.

• For the 3 percent, local match requirement, the Guidelines state that "In-kind contributions eligible to satisfy 3 percent local contribution include project specific right-of-way and waiver of permitting fees, if calculated in the project cost and contribution amount." Furthermore, active transportation capital improvements and first/last mile investments applied towards the 3 percent local contribution must be "included in the project scope and cost estimate at the conclusion of preliminary engineering (30 percent plans)." Additional guidance should be developed as these provisions may be too restrictive to provide a reasonable mechanism for satisfying the 3 percent requirement through in-kind contributions or active transportation and first/last mile investments.

**Multi-year Sub-regional Programs**

While sub-regions played a significant role in the development of the Mobility Matrices and formation of the MSP Expenditure Plan, the draft Guidelines do not recognize or specify the role of sub-regions that may elect to perform sub-region wide programming of MSP projects. The final guidelines should include the specific role of sub-regional authorities in this respect. Such guideline language should be consistent across all sub-regions to ensure ease of management by Metro and for jurisdictions whose boundaries may cross sub-regions.

• The draft Guidelines allow Measure M funds to be used for pre-construction activities as defined in the Guidelines to include "planning studies." Expanding the term to "program and planning studies" will allow sub-regions to ensure that MSP programs and projects complement each other and maximize mobility and/or sustainability as an element of project readiness.

• Although the draft Guidelines provide that procedures for determining project readiness will be established within one year of adoption of the Guidelines, the current criteria for project readiness of pre-construction phases in the Guidelines is too restrictive. Most of the listed criteria would not be determined until completion of the PA/ED phase and minimum 30 percent design. The current Guideline criteria for pre-construction phases should be eliminated, and replaced with language reflecting that procedures for determining project readiness for each of the phases for 1) planning studies, 2) preliminary engineering/project approval/environmental document, 3) final design, and 4) right of way acquisition will be established within one year of adoption of the Guidelines.
• The draft Guidelines provide that sub-regions or jurisdictions within the sub-regions are considered eligible project sponsors. Some sub-regions may have commented that allowing local jurisdictions to be eligible project sponsors would detract from the sub-regions' ability to develop and implement a cohesive and strategic program of MSP projects. While this has merit for larger sub-regions with sub-region wide programmatic needs, some sub-regions may elect to defer to local agencies to select and implement projects specific to their jurisdictions. Therefore, the Guidelines should retain the eligibility for individual jurisdictions to be project sponsors.

• The MSP Highway Guidelines state, "It is expected that local jurisdictions will contribute to total project costs." Sub-regional projects and programs should be completely funded using the sub-regional funding allocations in the Ordinance. Local funding was not required in the Ordinance for sub-regional projects. No additional local investments in sub-regional projects should be required during the planning, development, design, right-of-way, or construction phases of a sub-regional project.

Sub-regional Equity Program

• The draft Guidelines provide that such funds identified may be any combination of federal, state, or Metro controlled funds including, but not limited to, Measure M. This potentially places significant grant compliance requirements on project sponsors that were not intended in the Measure M Ordinance. Project sponsors or sub-regions may choose to leverage Sub-regional Equity Program funding with other grant sources, but such a decision should not be unilaterally imposed by Metro.

Local Return

• Allocation Methodology - While the ordinance and draft Guidelines specify distribution by resident population, several alternative distribution methodologies have been suggested, such as setting a minimum floor for small-population cities, and distributions based on a combination of factors such as taxable sales, employment, daytime population, and street mileage. The County does not object to a reasonable, equitable minimum floor to assist small-population cities; however, the other proposed factors would be unfairly detrimental to County unincorporated residents.

• The Guidelines should not permit sub-regions to aggregate the local return funds of jurisdictions within its boundaries and distributing funds based on a formula of the sub-regions' choice.

• There should be no required set-aside expenditure for any eligible use.
• The Guidelines language regarding lapsing and reserve fund provisions should reflect the fact that some local agencies will have to bank substantial Local Return funds in order to meet their 3 percent contributions to transit projects.
Good afternoon,

Attached please find a letter from the Valley Industry & Commerce Association as public comment on the Measure M Draft Guidelines.

Thank you for your time and consideration.

Best regards,

David M. González
Legislative Affairs Manager
Valley Industry & Commerce Association (VICA)
16600 Sherman Way, Suite 170
Van Nuys, Ca. 91406
(818) 817-0545
david@vica.com
www.vica.com
May 26, 2017

The Honorable Members of the Board of Directors
Los Angeles County Metropolitan Transportation Authority
1 Gateway Plaza
Los Angeles, CA 90012

SUBJECT: Measure M Draft Guidelines

Dear Board Members,

The Valley Industry and Commerce Association (VICA) proudly worked with Metro’s CEO Phil Washington, Metro Board Members and staff, San Fernando Valley elected officials, multiple industries that serve Los Angeles County, and Valley neighborhoods to rally strong support for Measure M and ensure its passage in November 2016.

We commend Metro for creating the Measure M Policy Advisory Council, and look forward to standing with Metro to achieve the economic benefits of $360 million a year and 465,690 new jobs across the region, as well as to build the proposed projects in the Mobility Matrices within 40 years.

With these mobility, economic, and project delivery goals in mind, VICA stands with L.A. businesses and business groups in offering the following guiding principles and suggestions for the Measure M Draft Guidelines:

1. Fulfill the promises to voters who supported Measure M.
2. Position Measure M most favorably to raise $120 billion in sales tax receipts by expediting timelines for major projects, especially connecting job centers and goods movement corridors.
3. Ensure that Metro’s “Operation Shovel Ready” pipeline leverages new public and private funding opportunities and competitive timelines.
4. Expand bus rapid transit corridors in conjunction with road repair and innovative technology.
5. Increase local job and entrepreneurship opportunities and mitigate transit construction impacts for small businesses.
6. Make L.A. County’s economy more resilient by restoring the middle class, reducing the cost of transportation and housing, and providing good paying jobs.
7. Invest in disadvantaged communities and populations.
8. Incentivize growth by rewarding high growth areas at each 10-year review cycle.
9. Create an innovative and technologically connected L.A. County.
10. Partner with businesses, colleges and universities, senior, low-income residents, and people with disabilities to seek ways to fund and increase public transit ridership.
11. Improve services to seniors, people with disabilities, low-income communities, and students.
12. Manage debt effectively and efficiently.
13. Focus on safety and customer experience.
14. Use local return funds most efficiently and audit regularly.
Furthermore, in conjunction with the business community, we recommend the following specific additions to the draft guidelines:

- **Administration and Oversight (Page 4)**
  - Consider having the Independent Tax Oversight Committee also review the Multi-Year Subregional Programs and Local Return funds.

- **Countwide Bus Rapid Transit Expansion (Page 5)**
  - Encourage Metro to pursue projects that include all of the identified BRT features in order to maximize improvement in travel time and customer experience.
  - Include DASH and private shuttles as eligible to use BRT lanes.

- **Major Project Acceleration Amendments (Page 11)**
  - Include “Earlier projects coming in under budget” as an event that could trigger acceleration of other projects.

- **Contingency Subfunds (Page 17)**
  - Support the use of these funds to allow for advance work on projects listed.

- **3% Local Contribution to Major Transit Projects (Page 20)**
  - Support the 3% Local Contribution to major transit projects.
  - Support allowing local jurisdictions to contribute first/last mile active transportation improvements as part of their 3% local obligation.

- **Multi-Year Subregional Programs (Pages 15 and 22)**
  - Support the use of local funds to advance project readiness.
  - Authorize the Independent Tax Oversight Committee to review any borrowing between projects in this program.

- **Metro Active Transportation 2% (Page 41)**
  - Support Metro’s active transportation program and integration with first/last mile policies.
  - Consider providing an incentive for those programs which assist seniors.

- **1% Regional Rail (Page 54)**
  - Include reference to Metrolink’s Strategic Plan and align funding priorities and performance criteria to the goals set forth in that document.

- **2% ADA Paratransit for People with Disabilities; Discount for Seniors and Students (Page 65)**
  - Reconsider the proposed split of these funds (75%/25%) between people with disabilities and seniors/student programs with further input from stakeholders.

- **Local Return (Page 70)**
  - Consider making this program subject to review by the Independent Tax Oversight Committee.

Thank you very much for the opportunity to provide input on this important matter. VICA looks forward to continued involvement in the Measure M implementation process.

Sincerely,

Kevin Tamaki  
VICA Chair

Stuart Waldman  
VICA President
Dear Metro staff,

Attached please find a joint public comment letter from LA THRIVES and Enterprise Community Partners. Contact information for myself and KeAndra Dodds is included in the letter, and KeAndra is cc'ed on this email.

Thank you for your consideration.

Thomas Tsun-Hung Yee
Initiative Officer – LA THRIVES
thyee@liifund.org | T: 213-627-2042
http://www.lathrives.org/

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May 26, 2017

Mr. Phillip A. Washington  
Chief Executive Officer  
Metro  
One Gateway Plaza  
Los Angeles, CA 90012

LA THRIVES & Enterprise Community Partners Comments on Draft Measure M Guidelines

Dear Mr. Washington,

The historic passage of Measure M signifies a new chapter in the physical transformation of Los Angeles and the evolution of how our residents live, work, and play. We appreciate the opportunity to provide public comment on the Measure M Master guidelines which will shape the use of funding that will have a lasting impact on Angelenos far into the future.

LA THRIVES is a countywide collaborative whose mission is to leverage resources, including financial and social capital, towards equitable smart growth in Los Angeles County. Our vision is for all Angelenos to have opportunity to achieve economic stability and good health by having access to affordable homes, quality jobs, and affordable low-carbon transportation.

ENTERPRISE COMMUNITY PARTNERS works with partners across the United States to create affordable housing that is connected to opportunity in thriving communities. Together, we identify, pilot and scale solutions designed to end housing insecurity for low-income people. We know that a healthy and stable home must be affordable – as well as located in a community connected to good schools, jobs, transit and health care. We support communities near transit by providing a range of services to assist public and non-profit institutions and organizations in planning, designing and financing equitable transit oriented development.

Our comments below reflect our commitment to improving the quality of life of the lowest-income Angelenos, and ensuring that no communities are left behind or even worse, forced to bear continuing inequities via disinvestment or involuntary displacement while others benefit. We know that to ensure equitable outcomes, public policy requires careful attention and planning that recognizes and improves the conditions of the communities with the fewest resources. Tens of billions of taxpayer dollars will be deployed over the coming decades, and many of the
decisions on those investments have yet to be decided - the stakes are enormous and we cannot underestimate the responsibility to the residents of the region to provide transparency and accountability.

Improving current social equity provisions in the draft proposal
We commend Metro for recognizing social equity and environmental sustainability through important components in the original ordinance as well as the draft guidelines. Specifically, we support the following provisions of the draft guidelines and offer suggestions for improvements:

- **Linking investments to and reinforcing Metro policies and planning** (pp.35-36, 41) that are critical to improving access, safety, and sustainability in the transportation system such as the Active Transportation Strategic Plan, First/Last Mile Strategic Plan, Complete Streets Policy, and Countywide Sustainability Planning Policy. However, we see no reason why these policies ought not to inform a wider range of Measure M investments, all of which could contribute to increasing and improving access, safety and sustainability. We recommend making similar references to these plans and policies in other investment categories including Multi-Year Subprograms generally, Highway subfunds, 2% System Connectivity Projects, Subregional Equity Program, and Local Return.

- **Measure M includes our county’s first dedicated local funding source for walking and biking**, though at only 2% of the measure, this funding falls far short of the identified need. However, while the guidelines reference alignment with “Vision Zero” or equivalent policies, Metro does not have its own Vision Zero policy to guide investments. We recommend investing in the development and adoption of regional Metro Vision Zero guidance (policy, toolkit or framework) simultaneous to developing sub-guidelines for the 2% Active Transportation category. While specific investments and Vision Zero policies will likely be implemented by local jurisdictions rather than Metro, a regional Vision Zero policy would encourage local jurisdictions to adopt their own policy or provide guidance in the absence of such local policy.

- **Improving benefits and use-experience for low-income seniors and students** (pp. 65-66 and Appendix B), through simplifying the eligibility verification and renewal process, providing new funding for low-income seniors and students, and making these benefits available through the TAP card. The draft guidelines propose the allocation of up to three-quarters of this funding for ADA paratransit service and the remaining funding for a revised fare discount program. First, we recommend clarification on whether the 25 percent for fare discounts is a minimum or a maximum because the language in the proposed guidelines is not clear. Secondly, while we generally support reforming the existing underutilized fare subsidy program to serve more riders, we recommend taking another look at the overall funding proposal, which was not vetted with interested stakeholder groups that represent the affected communities. We recommend allowing for up to 1 year to establish sub-guidelines for this investment.
category to allow for additional public participation, similar to processes proposed in various other investment categories.

- **Making Transit Oriented Community investments eligible in Local Return (p. 80)** that goes beyond Transit Oriented Development, and builds on Metro’s overall TOC framework. We commend this approach for increasing potential to leverage the state’s Affordable Housing and Sustainable Communities funding program. However, neither the Measure M guidelines nor Metro’s Transit Oriented Communities Demonstration Program clearly delineate specific activities or investments that will be eligible. While we recognize the need to not be overly prescriptive and to allow for innovation, there must be clearer guidance on what types of investments are eligible. Given Metro’s Board adopted policies and programs, we recommend that eligible investments include those that:

  1. Support the development and preservation of affordable housing, as defined in Metro’s joint development policy, in TOCs;
  2. Support the inclusion of small businesses in mixed use buildings in TOCs;
  3. Help remove land use barriers to transit oriented development;
  4. Implement best practices and policies for sustainable and transit-supportive land uses across a variety of neighborhood typologies; and
  5. Otherwise ensure inclusive and equitable transit oriented communities for those at all income levels.

**Additional recommendations**
We offer additional recommendations that we feel are missing from the current draft altogether, or in some cases alternatives to current draft proposals.

- **Clarify the definition of capital projects.** The Measure M Ordinance includes as part of the definition of Capital Improvements “preliminary studies, design, or surveys” (Ordinance page 2, line 17). We recommend clarifying language in the guidelines to include “planning, project development and data collection, community engagement, and technical assistance for these activities in disadvantaged communities” to the eligible activities described in the guidelines on page 25.

- **Remove “first-come, first-served” deployment of funding based on readiness and instead rely on performance criteria** (guidelines, page 15 and 23). We strongly recommend avoiding the distribution of funding in any program on a “first come, first served” basis in the absence of specific performance criteria. Transforming mobility in our region will only occur if all investments are aligned toward a common set of goals, as outlined in the Measure M Ordinance and the overall Measure M Performance criteria. Without performance criteria and deploying capital solely on readiness eliminates a mechanism to achieve the Measure’s stated goals. In addition to procedures for determining project readiness in the Multi-Year Subregional Programs (page 23), we also recommend establishing performance criteria within the same timeframe. This
allows Metro to accommodate additional public participation and planning to augment the incomplete Mobility Matrix process, also referenced on page 23.

- **Align investments towards the anticipated social equity criteria in the Long Range Transportation Plan** Los Angeles County is a diverse region with many different needs, and the guidelines’ role is to help allocate resources to projects that address those needs. In the face of so many competing pressures and limited resources, it is important to set policy based on common values and defined objectives. It is hard to meaningfully address the needs of low-income communities and communities of color in the absence of an equity policy that clearly defines these communities and their mobility needs. The final guidelines should anticipate such a policy in the Long Range Transportation Plan (LRTP) and include mechanisms to advance social equity in the implementation of Measure M programs, such as prioritization and/or set-asides in funding programs. We recommend adding language recognizing the anticipated social equity policy and implementation mechanisms to the Administration & Oversight section of the guidelines.

- **Maintain the population-based allocation formula for Local Return (Guidelines Attachment C)** We strongly recommend maintaining the population-based allocation formula for Local Return, which—while not perfect—would steer clear of negative outcomes for certain jurisdictions, particularly for those with concentrations of low-income communities. We recommend rejecting any alternative calculations for Local Return, and following the Measure M Ordinance which clearly stipulates that Local Return funding should be allocated according to population. In various discussions leading up to the Measure M Ordinance, alternative formulas were considered and dismissed as less equitable. For example, formulas based on road miles or land area would favor sprawling jurisdictions over those with more efficient land use and transportation patterns. Sales tax receipts-based or employment-based formulas would favor those jurisdictions that have overbuilt office and retail and underbuilt housing supply in the midst of a historic regional housing shortage. Despite the consideration and rejection of alternative formulas, the draft Measure M Guidelines include a proposal for a minimum allocation of $100,000 per year to eight jurisdictions that would otherwise receive less funding from the per-capita formula. This extra funding would come from proportionally reducing allocations to all other 81 local jurisdictions. The eight jurisdictions that would benefit from the Local Return floor fall into two categories: they are either small, exclusive suburbs born out of a history of residential segregation or industrial tax havens that have intentionally excluded residents to avoid accountability for environmental justice impacts from heavy industry. Meanwhile, the donor cities would include densely populated, low-income communities like Bell, Cudahy, and Lawndale. Adjusting the Local Return floor higher or lower than $100,000 would change the list of which cities benefit and which ones are impacted, but it wouldn’t change the fundamental calculation that the cities that benefit the most from any Local Return floor are those with a history of exclusion and/or environmental injustice.
We appreciate your tremendous efforts on Measure M to date. We look forward to continued partnership and engagement going forward. If you have any questions, please contact LA THRIVES, Initiative Officer, Thomas Yee, at tyee@liifund.org or (213) 627-2042 or Enterprise, Senior Program Director, Policy, KeAndra Dodds, at kdodds@enterprisecommunity.org or (213) 787-8214.
May 26, 2017

The Honorable John Fasana
Chairman, Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza
Los Angeles, CA 90012

Subject: Access Services comments on the Measure M Draft Guidelines

Dear Chairman Fasana:

Access Services, which provides Americans with Disabilities Act (ADA) complementary paratransit on behalf of Metro and 44 other fixed-route transit agencies in Los Angeles County, would like to respectfully submit the following comments on the recently-released Measure M Draft Guidelines.

First and foremost, Access would like to thank the Metro Board of Directors and Metro Executive Management for including funding for ADA paratransit in the Measure M ordinance. Given the likely future increased demand for this federally-mandated service, we feel this was a prudent action for Metro to take.

Comments on the 2% ADA Paratransit/Metro Discounts for Seniors and Students

- Under Allocation Methodology, Access would amend this section as follows so that it is clearer what the ongoing split should be between these two worthy uses and that ADA paratransit, which is a federal civil rights mandate that must be funded by the region, is guaranteed a steady, dedicated funding source.

  The program funds will be allocated annually based on budgetary needs, with ADA as a priority, for a maximum of 75% for ADA paratransit, and a minimum of 25% for Metro discounts for seniors and students. Any unused funds will revert back to the pool of funds to be redistributed in the following fiscal year.

- Access believes that programs that encourage the use of public transportation by older adults and people with disabilities provides this population with additional mobility options while reducing demand for expensive ADA paratransit services. To that end, under Eligible Uses, Part A, Access would add the following language: "Up to 10% of the ADA paratransit funds may also be used for activities that encourage the use of

Access Services is a public entity.
other transportation options (besides ADA paratransit) by older adults and people with disabilities, such as Travel Training and other similar programs in coordination with Metro."

Comments on the Measure M Local Return program

- Finally, Access suggests that the Metro Board of Directors encourage or incentivize entities receiving Local Return funds to spend a portion of the funding on operating and capital projects that improve access and mobility for older adults and people with disabilities.

If you have any questions about these comments or would like additional information, please contact me at colaiace@accessla.org or 213-270-6000.

Sincerely,

Andre Colaiace
Interim Executive Director
Hi- attached you will find comments on the draft guidelines from the American Heart Association.

Warm Regards,

**Claudia Goytia**  
*Government Relations Director, Greater Los Angeles Division*  
816 South Figueroa Street  Los Angeles CA 90017  
[claudia.goytia@heart.org](mailto:claudia.goytia@heart.org) | [www.heart.org](http://www.heart.org)  

**My family is why**

![American Heart Association](https://i.imgur.com/3.png)
May 26, 2017

Mr. Phillip A. Washington
Chief Executive Officer
Metro
One Gateway Plaza
Los Angeles, CA 90012

RE: Comments on Draft Measure M Guidelines

Dear Mr. Washington:

The American Heart Association/Stroke Association congratulates Metro staff on the release of the draft Measure M Guidelines for public review. These guidelines mark a key step toward the implementation of Measure M’s promise to provide Los Angeles County residents with access to a safe, reliable, affordable, and sustainable transportation system. In Collaboration with partners like Investing in Place the American Heart Association has reviewed the draft guidelines and provides the following input on the guidelines with a focus on how implementation of Measure M projects and programs will translate into improvements in communities that prioritize safety, improved mobility and elevate equity in Los Angeles County.

We believe that investments in the transportation system are essential to improving and addressing safety, healthy, and creation of equitable communities. Historically, transportation decisions have failed to incorporate these objectives, losing opportunities to reduce pollution and creating safe streets for people walking, biking, and accessing transit. In recent years, we have, however, seen tremendous progress on reversing these trends through supportive policy for complete streets, first and last mile access, and green infrastructure. Our support for Measure M was predicated on the notion that additional funding would be directed to implement these new policies that would help people move safely in Los Angeles County, while understanding that many of the details on implementation would need to be worked out in the guidelines.

We also recognize that, it is the guidelines that describe the exact mechanisms by which general policies are applied to each project and program. It is our belief that these guidelines incorporate mechanisms like, data-driven decision making, community engagement, and prioritization of the needs of low-income communities and communities of color that are at the core of building a transportation system that will improve mobility in Los Angeles County. We believe that Measure M will only live up to its potential if these values are integrated into all aspects of the measure’s implementation.

Based engagement and review with advocates and partners, we offer the following recommendations for improving the draft guidelines.

The American Heart Association is a registered 501(c)3 organization.
Defining Complete Streets: Metro’s Complete Streets Policy is the primary mechanism for implementing this vision, yet the draft guidelines are vague about its applicability to some programs. The final guidelines should clarify that Metro’s Complete Streets Policy applies to all funding programs, including multiyear Subregional programs, and define Metro’s oversight role to ensure compliance. Complete Streets are essential to moving people safely and changing behavior when it comes to walking in Los Angeles County.

Advancing Mobility Options: A world-class transportation system is more than the sum of its parts. Measure M is a vision for a more effective system that provides people real mobility options. To fulfill this vision, the final guidelines should ensure broad eligibility of programs that support behavior change (i.e. TDM), planning, project development, and data collection, not just capital projects.

Prioritize Need vs First Come, First Served: Final guidelines should avoid distributing funding in any program on a “first come, first served” basis. Doing so would miss the opportunity to select the most effective projects based on clearly defined performance measures.

Incorporate Equity Policy: It is hard to meaningfully address the needs of low-income communities and communities of color in the absence of an equity policy that clearly defines these communities and their mobility needs. The final guidelines should anticipate such a policy in the Long Range Transportation Plan (LRTP) and include mechanisms to advance social equity in the implementation of Measure M programs, such as prioritization and/or set-asides in funding programs.

Below are recommendations outlined by our partners to specific programs in the guidelines.

Countywide Active Transportation Program
Measure M includes the first dedicated local funding source for walking and biking, though at only 2% of the measure, this funding falls far short of the identified need. That makes it critical that this limited funding is prioritized for the projects and programs that will have the greatest benefits. The American Heart Association supports developing more detailed guidelines over the next year to maximize the benefits of this program. We believe this extra year for guidelines development will also provide an opportunity to integrate social equity metrics into this program.

While it is important for some of this funding to support promising local projects and programs, Metro can and should first allocate stable funding for its own ongoing countywide program needs, including open streets, bike share operations, bike safety education, and safe routes to school non-infrastructure programs. Next, Metro should target assistance to planning and project development in disadvantaged communities to help level the playing field in terms of resources for active transportation as well as to increase the region’s competitiveness for state and federal funding programs.

Local Return
The Measure M Ordinance clearly stipulates that Local Return funding should be allocated according to population. In various discussions leading up to the Measure M Ordinance, alternative formulas were considered and dismissed as less equitable. For example, formulas based on road miles or land area would favor sprawling jurisdictions.
over those with more efficient land use and transportation patterns. Sales tax receipts-based or employment-based formulas would favor those jurisdictions that have overbuilt office and retail and underbuilt housing supply during a historic regional housing shortage. Despite the consideration and rejection of alternative formulas, the draft Measure M Guidelines include a proposal for a minimum allocation of $100,000 per year to eight jurisdictions that would otherwise receive less funding from the per-capita formula. This extra funding would come from proportionally reducing allocations to all other 81 local jurisdictions. The eight jurisdictions that would benefit from the Local Return floor fall into two categories: they are either small, exclusive suburbs born out of a history of residential segregation or industrial tax havens that have intentionally excluded residents to avoid accountability for environmental justice impacts from heavy industry. Meanwhile, the donor cities would include densely populated, low-income communities like Bell, Cudahy, and Lawndale. Adjusting the Local Return floor higher or lower than $100,000 would change the list of which cities benefit and which ones are impacted, but it wouldn’t change the fundamental calculation that the cities that benefit the most from any Local Return floor are those with a history of exclusion and/or environmental injustice. For this reason, we strongly oppose any Local Return floor.

Again, congratulations on reaching this important milestone. We appreciate your diligent consideration of these recommendations and continued engagement with diverse stakeholder groups through this process.

Warm Regards,

Claudia Gaytia
Government Relations Director
American Heart Association/Stroke Association

The American Heart Association is a registered 501(c)3 organization.
Thompson, Keira

From: Holman, Kari <HolmanK@scrra.net>
Sent: Friday, May 26, 2017 9:23 PM
To: THEPLAN
Subject: I have Draft Measure M Guidelines comments.
Attachments: Measure M Guidelines Comment from SCRRRA - Metrolink - dated 05-26-17.pdf

On behalf of Arthur T. Leahy, Chief Executive Officer, please find attached letter.

Thanks!

METROLINK.

KARI HOLMAN
Assistant to the CEO/Board Secretary
213.452.0255 t
213.332.6983 m

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May 26, 2017

Mr. Phillip A. Washington  
Chief Executive Officer  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012-2952

Dear Mr. Washington:

Thank you for the opportunity for the Southern California Regional Rail Authority (SCARRA/ Metrolink) to share comments with you on the Measure M Guidelines. Since the draft guidelines were released on March 23, 2017, we have been working with your staff to refine the guidelines, especially those related to Metro’s investments in regional rail infrastructure and service. We believe that, together, we have refined the guidelines to facilitate Metro’s continued investment in the Metrolink regional rail system in a flexible way. In addition, the guidelines acknowledge Metro’s role in supporting the performance of the regional rail system and the benefits to residents and jurisdictions within Los Angeles County.

We would like to offer some additional thoughts to guide the application of the guidelines moving forward.

*Sustainable Funding for the Regional Rail Program* — The funding level planned starting in 2039 is critical for the continued operation of the regional rail system. We ask that Metro consider that the regional rail system’s ability to perform according to the guidelines is affected by:

- Metro contributions to maintenance and rehabilitation over time; and
- Metro requests related to service (e.g., certain types of service may affect farebox/revenue recovery).

*Other Programs Within Measure M* — SCRRA generally supports broad eligibility requirements for programs so that Metro may invest in the regional rail system within Los Angeles County with as many potential sources of funding as possible. For example, grade separations should be eligible for 2% System Connectivity Projects (Highway Construction Subfund) and double tracking and significant capacity improvement projects should be eligible for 2% System Connectivity Projects (Transit Construction Subfund).
Furthermore, we will continue to work with Metro staff to identify eligible funding sources, including Measure M and other local, state, and federal sources, to support the regional rail system's significant rehabilitation, replacement, and state of good repair needs.

We had earlier submitted more detailed versions of these comments to the Measure M Policy Advisory Council (Attachment A).

Including flexibility in these guidelines is critical for Metro, Metrolink, and their partners to meet the evolving transportation needs of Los Angeles. To ensure that these guidelines continue to develop in a way that best supports the improvement of the regional rail system and best reflects changing public policy goals, we would like to continue to engage with Metro staff to refine the Measure M Guidelines as necessary whenever they are reviewed again. We look forward to working with you and will provide additional input. Thank you for your continued partnership.

Sincerely,

Arthur T. Leahy
Chief Executive Officer
## Attachment A – Comments by Metrolink through the Measure M Policy Advisory Council

<table>
<thead>
<tr>
<th>Section of Measure M Guidelines Commented</th>
<th>Comment Title</th>
<th>Comment</th>
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| 1% Regional Rail (p. 54) | Factors Affecting Performance for Regional Rail | In 2039, the Regional Rail Program shall receive an additional 1% of one cent with the expiration of Measure R (3% of ½ cent), maintaining current funding levels. The Program is entitled to receive the funding with the meeting of service goals as set forth in the accompanying guidelines. Given the significance of the funding, SCRRRA requests the following items be included in the evaluation:  
  - Consideration of Metro contributions to maintenance and rehabilitation and the impact of those investments on system performance (safety and reliability, and speed)  
  - Consideration of how requests for service that may negatively affect performance against metrics and measures (e.g., requests for service may affect farebox/revenue recovery) |
| 2% System Connectivity Projects (Highway Construction Subfund) (p. 43) | Eligible Recipients (Hwy Subfund) | Metrolink (SCRRRA) and other rail development authorities often implement projects listed in this subfund (such as grade crossings and rail projects with goods movement purposes). Adding the Southern California Regional Rail Authority (Metrolink) and other rail development authorities as examples of eligible recipients would align eligible projects with eligible grantees. This would be consistent with Proposition 1B programs (including Trade Corridors Improvement Fund and Highway Railroad Crossing Safety Account) and the Goods Movement section of SCAG’s Regional Transportation Plan. |
| 2% System Connectivity Projects (Transit Construction Subfund) (p. 46) | Eligible Uses of Transit Subfund | Core principles for the development of the eligible uses, evaluation criteria, and procedures should include (1) network capacity and (2) connectivity expansion. Consideration of matching funds from other funding sources, including other jurisdictions and other measures (Prop A, Prop C, Measure R) and recent expenditures from other phases of a program should be made. |
| General Comment | Projects Eligible for Multiple Programs | Projects shall be evaluated under the merits of each program as indicated in the guidelines without consideration or prejudice as to whether they are eligible for other programs. |
Hello,

Thanks for publicizing the review of the funding guidelines for Measure M.

Please forgo the local return floor as proposed. The cities that stand to benefit from local return minimums were overwhelmingly opposed to Measure M in the first place. A minimum allotment will lead to forced / ill-planned expenses. The idea is silly and should be abandon.

As always, I prefer Measure M funding to be used to support efficient, sustainable and effective forms of mobility. It pains me to see money directed to expanding roadways, the same failed logic that got us into this immobilizing mess that is suburban sprawl.

Best of luck in using and managing these funds wisely and appropriately, the ease of mobility of in Los Angeles is the literal foundation to the most robust, appealing and enjoyable city in modern society.

Thanks again,

--

Michael Hayes
951.704.6849
michaelhayes.la
I am writing to express concern over the proposed Measure M guidelines related to the 2% for ADA paratransit and Metro discounts for seniors and students.

The proposed guidelines would allocate 75% of this 2% for ADA paratransit. I strongly believe this is too much, and too lopsided a distribution. A greater emphasis should be placed on making it easier for seniors, students, and persons with disabilities to use Metro (as well as other fixed route systems).

I understand the need to fund Access Services (the ADA paratransit provider). And I know that Access Services needs increasing amounts to provide its service. In addition to the amount regularly provided by and through Metro, Access Services receives federal Section 5310 funds through Metro, an amount set aside by Metro for Access Services off the top.

In addition to using part of the Measure M funding for Access Services, I believe it is at least equally important to encourage older adults, persons with disabilities, and students to use Metro, through reduced fares and other incentives. At the very least, the funding through this 2% from Measure M should be a 50-50 split (50% to ADA paratransit, 50% for students/seniors/persons with disabilities to use fixed route). Encouraging these groups to use regular transit, and making it easier for them to do so, can produce long term benefits in terms of increased use of transit increased mobility, and potentially less demand on Access Services.

In addition to the proposed subsidies for the identified groups, I urge Metro to use some of these funds to provide other encouragement and incentives for the use of Metro and possibly other fixed route transit, whether through transit education and training, outreach to the affected groups, and improvements to bus stops and paths of travel to and from bus stops and rail stations.

Thank you for considering my concerns.

While I am writing this as an individual, I should mention that I am currently chair of Metro's Accessibility Advisory Committee, and have worked professionally on issues involving transporation for seniors and persons with disabilities for more than 20 years.

Ellen Blackman
310-721-3731
ellenblackman@att.net
Hello Metro!

I was excited to see that Metro was seeking public input on the management of Measure M funds on a social media post today.

It is my suggestion that the local return allocation for various cities in the county should be used first for locally managed light rail connections to existing metro lines.

Light and heavy rail alternatives to highway travel should be the #1 focus for Metro, and I think the majority of my friends and neighbors feel the same way.

In furtherance of this, in addition to supporting new locally managed light rail connections I think that the following rail projects should be prioritized:

- Dramatically increase frequency of Metrolink service and study construction or purchase of new track to avoid freight train congestion and other scheduling conflicts affecting the Pacific surf line.

- Extending the GREEN line to the busy Norwalk/Santa Fe Springs Metrolink Station.

- Study extension of Metrolink Perris valley service from current terminus to Hemet/San Jacinto along existing abandoned right of way.

- Study of Metrolink or other passenger rail service between Union Station and LAX along the harbor subdivision.

- Blue/Expo improvements including study of additional grade separation and traffic signal preemption in problem areas (Especially Flower Junction & Long Beach Blvd) as well as study feasibility of adding a third track for express service during peak hours, as outlined by board member Dr. Robert Garcia's recent motion to study exactly that.

- Orange Line conversion back to light rail.

- Construct new light rail line along the former Pacific Electric right of way to Santa Ana, and accelerate the construction of the northern portion of same along Salt Lake Ave.

- Study new Metrolink route to Huntington Beach in addition to other sorely needed rail connections to Orange County.

- Study capital costs for construction of new Metrolink route between Santa Clarita & Ventura using abandoned Southern Pacific right of way.

- Extension of the Green line to Torrance, Lomita, Wilmington, Long Beach.

Keep up the great work, Metro - LA is very proud and fortunate to have you.

Kind Regards,
Alexander Barber
3918 BEVERLY BLVD APT 604
LOS ANGELES CA 90004-3461

P.S. If Metro or Metrolink are hiring, I've got loads more ideas to continue improving rail service in Southern California!
I support the Measure M Guidelines and write to suggest certain minor amendments to ensure that the Measure M program achieves its full potential.

Firstly, the Guidelines should emphasize the importance of protecting safety through an express requirement that projects aim toward the total elimination of transportation-related fatalities (Vision Zero).

Secondly, the Guidelines should expressly recognize the close relationship between transportation and housing policy by encouraging Metro and local jurisdictions receiving local return funds to incorporate affordable housing into major capital projects, and to analyze concurrently with the environmental process for any project both the compatibility of the current land use regulations with the goals of the project and whether changes to land use regulations to align land use with transportation are warranted because of the project.

Thirdly, the Guidelines should encourage projects to identify during the environmental stage potential policy changes that might enhance the project's goals. For example, if a local ordinance presents a barrier to the success of a project - particularly a multi-billion dollar one - the environmental report should identify that policy so that policymakers can determine whether it should be changed.

Sincerely,

Joseph M. Sanderson
I ride/driver a vanpool.
I've heard that the carpool lanes may require increased ridership to increase the speed to meet federal guidelines.
Is there any thought to reducing access to hybrid vehicles to help with this regard?

Karen
Van Nuys
Dear HDC Board of Directors

1) We, the owners of APN 0459 356 07 and 0459 356 06, have been working on a commercial project on our APNs mentioned above since we created the TOPO of our APNs in 2013. Our commercial project has been reviewed by the City of Adelanto multiple times and on the way to be approved. Currently, the City of Adelanto is discussing with Caltrans of the possibility of obtaining Right-Turn-In and Right-Turn-Out ingress and egress from High Way 395 to our project’s land (APN 0459 356 06 & 07).

2) We also have been informed that Caltrans will build a traffic signal light at the intersection of Joshua St and US 395 as Caltrans expands the US 395 in 2018. This traffic signal light will increase commercial activities in our project since our project’s land (APN 0459 356 06 & 07) is the prime commercial SWC of Joshua St and US 395.

3) We read the Draft EIR/EIS and Final EIR/EIS of HDC – E 220 Project from the official site of HDC. We found out that the HDC project will impact the two RIGHT-TURN-IN and RIGHT-TURN-OUT of our project mentioned in statement 1 (above). The HDC project will also remove the Traffic Signal Light at the intersection of Joshua St and US 395. Finally, the commercial area of our project will be reduced significantly by the HDC-E 220 project.

For further information and updates about how the HDC project will impact our project’s land, please contact us at davidp@svcsoft.com and (714) 496 2359.

Thank you

Duc Van Pham
To whom it may concern:

For over 30 years the State of California Department of Conservation has identified and protected a geological reef in Soledad Canyon about 3 miles north of the Shadow Pines exit on Highway 14. The State of California has not allowed construction to occur within 2 miles of the mine. The mine was selected to replace the quarries in the San Fernando Valley, which are very close to being thoroughly mined out. The mineral rights to this property are owned by the United States Government and are responsibility of the Bureau of Land Management. Over 15 years ago the BLM solicited bids for the mining of this asset. The parties responsible for the bids today are CEMEX, who has fully permitted the operation but cannot move forward because of harassment from the City of Santa Clarita. This site is approximately 20 miles north of the San Fernando Valley and because it is not operating, producers have to go 50 miles north to the disadvantage of Little Rock to mine their aggregates. The additional haul is about $5.00 per ton. The projects being built by Measure M will all have to pay for this additional haul unless the Soledad Canyon Quarry is opened up. Does METRO have a plan to open the Soledad Canyon Quarry?

Very truly yours,

C. Dean Rasmussen

---

Shannon Young
Assistant to C. Dean Rasmussen
C. A. Rasmussen Company
2360-A Shasta Way
Simi Valley, CA 93065
P- (805) 581-2275
F- (805) 581-2265
Shannon@rasmussencollc.com
I hope a lot of money is spent on improving the time it takes to get to Union Station from Lancaster. It would be nice if it would only take an hour. Fix the track, have express trains. Also improve the restrooms at Union Station they are not close to being large enough and not kept clean. More train service for the North County, add three lanes to the 14 freeway.
For the city of Lake Los Angeles in L.A. County I have the following Requests for roadway improvements/upgrades. These are needed for Safety to reduce and prevent rear end collisions.

1. Add turn lanes or turn pockets to the following streets.
   A. Palmdale Blvd from 150th Street east to 170th Street east.
   B. Avenue O from 110th Street east to 170th Street east.
For the city of Lake Los Angeles in L.A. County I have the following Requests for roadway improvements/upgrades. These are needed for Safety of bicyclist. Presently there are no paved shoulders. Very dangerous to motorist leaving the roadway. Rollovers are very common.

1. New bike lanes to be added to the roadways.
   a. Avenue O from 170th street east to 90th street east
   b. 90th street east from Palmdale Blvd to Avenue N
   c. Avenue N from 90th street east to 50th street east
   d. 50th street east from Palmdale Blvd to Avenue N
   e. Avenue M from Avenue N to Sierra Hwy

Sent from Mail for Windows 10
For the city of Lake Los Angeles in L.A. County I have the following Requests for roadway improvements/upgrades. These are needed for Safety of bicyclist. Presently there are no paved shoulders. Very dangerous to motorist leaving the roadway. Rollovers are very common.

1. Add new bike lanes to the following road ways.
   A. Palmdale Blvd from 150th street east to 30th street east.
   B. 50th street east from Palmdale Blvd. to Avenue T (4 points) intersection.
Install new large drainage pipes and box culverts to keep water crossing the roadways. For Safety of motorist and traveling public. To be installed where water crosses roadway at the following washes. Lost of life has occurred in these locations in the pass years. Also causes undue ice to form on roadway winter months.

1. Palmdale Blvd Just west of (JWO) 90th street east.
2. Palmdale Blvd Just west of (JWO) 150th street east.
3. Avenue O between 135th street east and 145th street east.
4. Avenue N approx. at 60th Street east.

Feel free to contact me at: (661) 609-4589 I am willing to me with engineers or design personnel.

Charles Dellecese

Sent from Mail for Windows 10
Increased weekend Metrolink service and connecting busses to all areas of the valley.

Sent from my iPad
Regarding the issues of setting a floor on local return, I agree that a floor should not be set; however, there is also concern that cities will not have enough to perform projects. Therefore, rather than having a five year lapsing requirement, I would change it to five years or $1,000,000 without Metro approval to create a capital reserve fund. Some cities may choose to accumulate the money but not designate it into a capital reserve account, and this gives them the flexibility to not allocate it into capital reserve, or use it for special events which are primarily operating (i.e. city centennial parking shuttle).

Measure M does not state if subsidies to Transportation Network Companies are eligible for local return. They should be.

Clarify if new cities incorporated after 2016 are eligible to receive Local Return.

Sincerely,

Hank Fung
Instead of wasting more money on transportation that is only used by a very small percentage of people, how about fixing the giant potholes and horrible roads in this valley. There are paved roads that are more torn up than a dirt road. I did not vote yes on this measure.

Susan Champion
Greetings,

As a regular commuter on Metrolink's Antelope Valley Line, I hope that the Regional Commuter Rail (Metrolink and Amtrak) Improvements include the Roxford double tracking project.

I find that this effort will provide benefits to all involved, especially the commuters who should see improvements in commute times and residents close to the tracks who stand to benefit from the implementation of a quiet corridor.

I also hope to see further expansion of the North Counter TRANSPORTER service provided by AVTA should additional Metrolink service on the Antelope Valley Line be harder to obtain.

I hope that such efforts will see the light of day as it is an important improvement for those of us who come from the affordable housing communities of North Los Angeles County to the job centers of the Los Angeles Basin.

Sincerely,

Joe Pallon
Dear Metro,

Please use Measure M funds to build project 1, the High Desert Corridor between Victorville and Palmdale. The Antelope Valley area is desperately in need of an expressway that allows for safe travel from SR-14 to I-15. Adding provisions for rail and a bikeway would greatly benefit the residents of northern Los Angeles County.

Thank You

Mike Morrin
Palmdale, Ca
Thompson, Keira

From: Theron James <t.james9281@yahoo.com>
Sent: Saturday, May 20, 2017 10:38 AM
To: THEPLAN
Subject: I have Draft Measure M Guidelines comments.

Forget the frwy from the A.V. to Victorville, it serves no purpose! How about widen 14 frwy to 3 lanes w/ hov lanes from avenue k to newhall ave. And do a environmental atudy on a new highway from the antelope valley into santa clarita valley that will be more beneficial to commuters

Sent from Yahoo Mail on Android
2 projects for the antelope valley and all the other projects for down in Los Angeles... home owners already pay tax for street repair.. where does all that money go every year.... i do not support it ... metrolink is the most expensive metro ride i have been in.... you can go to New York and travel from one side to another and you still would not pay the 12 dollars or what ever the price ... only in california can you over charge and still tax the person more... service is no good ... now talking about fixing roads... if they would be fixed right they should last the years you guys say... every year you do mickey mouse job patch here and there pay 5 employees a weeks worth of pay to patch a few holes... it does not take all those workers to patch ... or all those days but you guys find ways to take more money... no on my vote
Heres an idea adding more lanes, making the carpool using fastrak. Anything that would help with traffic. Thanks

Elvia Nevarez
Good Afternoon,

I wanted to put my comments in for this before the cut off. I live off Ave M in the Antelope Valley. We are the busiest avenue that connects parts of Palmdale, Lancaster and Quartz Hill to the freeway. Our bridge is literally falling down that goes over the freeway between the fighting that goes on with the two major cities here.

My husband and I will take our motorcycle up and down the freeway system here and into Los Angeles. We also ride the Metro too. One of our biggest complaints is how long it takes to get JUST from Lancaster to Santa Clarita. They brought in the Transporter, but it is for the most part useless. If the traffic is terrible on the 14 freeway, it will end up causing EVERYTHING to slow. The trains will wait for that bus of people. It takes over 2 hours to get to Union. Money desperately needs to be spent on the North End of the County for our needs. If you are going to be putting in toll roads, they need to be affordable. The problem in the carpool lane here, is that we end up with people abusing it due to not understanding how it works on the 14 freeway since we are not a carpool lane that is ALL the time. We also have a LOT more people on the main freeways up in the North end of the county due to lack of options outside of taking a vehicle.

Connecting off the current rail we have here in the desert if you put in a fast track for another train would improve freeway time. Another issue with the Metrolink is price. It is MORE to ride the rail than it is to drive. (My numbers are based off my costs to drive my 2011 Elantra up and down the freeway at 38 MPG.) Also, this is a small request but having some dedicated motorcycle parking at your stations would be WONDERFUL.

Every tax hike and measure that is passed, we are forgotten out here but we still pay it.

Another issue with the Metrolink, we have VERY limited scheduling for it. The time frame for most of us does not work for commuting. My husband and I have ridden it for a variety of reasons including to pick up our 2016 BMW R 1200 RT from West Valley Cycle Sales in Winnetka. We have also timed driving to Newhall first and catching the train there and riding the rest of the way into Union Station. Which yes, it is faster literally by over an hour total time saved, to do that. (Which is really sad that the Antelope Valley has been so neglected in getting funds here to help with this.) I would really love to speak to some higher end people about my experiences and what my husband and I have found on using the Metro from the Antelope Valley, and into Los Angeles.

Thank you for reading my comments on Measure M and I am really excited to see the improvements that start.

Sincerely,

Kristen Davis

Contact:
Cell (530) 339-8281
Email: speaktok@gmail.com